

20L-23

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: November 17, 2020

ANALYST: Corinne Lucas

I. COMMITTEE: American Values PAC Inc.
C00623371
Chris Marston, Treasurer
P.O. Box 26141
Alexandria, VA 22313

II. RELEVANT STATUTE: 52 U.S.C. § 30104 (g)(1)
11 CFR § 104.4(c)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Timely File 24-Hour Reports)

American Values PAC Inc. (“the Committee”) failed to timely file one (1) 24-Hour Report totaling \$30,000.00 supporting one (1) independent expenditure disclosed on the 2020 July Quarterly Report, made after the 20th day but more than 24 hours before the day of the 2020 Primary Election held in the state of Iowa (Attachment 2).

On June 15, 2020, the Committee filed one (1) 24-Hour Report to support one (1) independent expenditure, totaling \$30,000.00, disseminated on May 26, 2020 (Image 202006159239789981).

On July 4, 2020, the Committee filed its 2020 July Quarterly Report, covering the period from April 1, 2020 through June 30, 2020. The report included a Schedule E (Itemized Independent Expenditures) disclosing two (2) independent expenditures totaling \$40,000.00 made in opposition to one (1) Federal candidate (Image 202007049244305579).

On July 28, 2020, a Request for Additional Information (RAFI) was sent to the Committee referencing the 2020 July Quarterly Report. Among other items, the RAFI

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American Values PAC Inc.
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noted that the Committee may have failed to timely file one (1) or more of the required 24-Hour Reports regarding independent expenditures. A chart was included with the RFAI identifying one (1) independent expenditure, totaling \$30,000.00, for which a 24-Hour Report had not been timely filed (Images 202007280300079015-17, Attachment 2).

On September 8, 2020, the Reports Analysis Division (RAD) Analyst called Chris Marston, the Committee's Treasurer. The Analyst explained that the late 24-Hour Report may be referred to another Commission office for potential further action. Mr. Marston stated that he would file a response to the RFAI as soon as possible (Attachment 3).

On the same day, the Committee filed an Amended 2020 July Quarterly Report. The report disclosed no change in activity to Schedule E from the original report. A memo text was included with the report stating:

“The Committee files this amendmnet [sic] in response to a request for additional information dated July 28,2020. The Committee inadvertently reported an Independent Expenditure in opposition to Steve King for the Indiana Primary election rather than the Iowa Primary election. This amendment corrects that error. An amendment to the 24-hour report correcting the error has also been filed. The request also noted that the 24-hour report for another independent expenditure was filed late. The staff arranging the expenditure misunderstood the reporting requirement and did not notify the treasurer of the expenditure until the invoice was received. The Committee promptly reported the expenditure upon receipt of invoice and payment. The Committee acknowledges that the 24-hour report was filed late, but notes that the Committee's own filings brought the issue to the attention of the Commission” (Image 202009089267119095).

To date, no further communications have been received from the Committee regarding this matter.

O-Index (2019-2020)															
Cmte. ID: C00623371 Cmte. Name: AMERICAN VALUES PAC INC.															
Treasurer Name: MARSTON, CHRIS Address: PO BOX 26141, ALEXANDRIA, VA 22313															
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
RQ2	Q1	N	7/28/2020	2	202007280300079013	1/1/2020	3/31/2020	7/28/2020	-	-	-	-	-	-	-
RQ2	Q2	N	7/28/2020	3	202007280300079015	4/1/2020	6/30/2020	7/28/2020	-	-	-	-	-	-	-
F3XN	MY	N	7/25/2019	7	201907259151661705	1/1/2019	6/30/2019		\$65,694	\$0	\$0	\$65,694	\$15,578	-	\$15,578
F3XN	YE	N	1/27/2020	19	202001279167392014	7/1/2019	12/31/2019		\$65,694	\$254,819	\$207,624	\$112,889	\$15,578	-	\$15,578
F3XN	Q1	N	4/13/2020	8	202004139216650100	1/1/2020	3/31/2020		\$112,889	\$0	\$44,500	\$68,389	\$15,578	-	\$15,578
F3XA	Q1	A	9/8/2020	8	202009089267117932	1/1/2020	3/31/2020		\$112,889	\$0	\$44,500	\$68,389	\$15,578	-	\$15,578
F3XN	Q2	N	7/4/2020	8	202007049244305572	4/1/2020	6/30/2020		\$68,389	\$0	\$40,000	\$28,389	\$15,578	-	\$15,578
F3XA	Q2	A	9/8/2020	9	202009089267119090	4/1/2020	6/30/2020		\$68,389	\$0	\$40,000	\$28,389	\$15,578	-	\$15,578
F3XN	Q3	N	10/11/2020	7	202010119285105538	7/1/2020	9/30/2020		\$28,389	\$0	\$0	\$28,389	\$15,578	-	\$15,578
F3XN	12G	N	10/15/2020	9	202010159294186213	10/1/2020	10/14/2020		\$28,389	\$25,000	\$0	\$53,389	\$21,578	-	\$21,578
F24N	24		5/26/2020	1	202005269239496308				-	-	-	-	-	-	-
F24A	24		9/8/2020	2	202009089267119083				-	-	-	-	-	-	-
F24N	24		9/4/2019	1	201909049163141140				-	-	-	-	-	-	-
F24N	24		10/15/2020	1	202010159294178710				-	-	-	-	-	-	-
F24N	24		6/15/2020	1	202006159239789981				-	-	-	-	-	-	-
F24N	24		8/30/2019	1	201908309163119773				-	-	-	-	-	-	-
F24N	24		8/28/2019	1	201908289163108290				-	-	-	-	-	-	-
F24N	24		8/23/2019	1	201908239163102671				-	-	-	-	-	-	-
F24N	24		8/22/2019	2	201908229163096536				-	-	-	-	-	-	-
Totals										\$279,819	\$292,124				

O-Index (2017-2018)															
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Treasurer Name: MARSTON, CHRIS Address: PO BOX 26141, ALEXANDRIA, VA 22313															
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
F3XN	MY	N	7/26/2017	9	201707269069824989	1/1/2017	6/30/2017		\$1,669	\$130	\$675	\$1,124	\$15,578	-	\$15,578
F3XN	YE	N	1/25/2018	9	201801259090644569	7/1/2017	12/31/2017		\$1,124	\$50	\$634	\$540	\$15,578	-	\$15,578
F3XN	Q1	N	4/12/2018	8	201804129108012912	1/1/2018	3/31/2018		\$540	\$320	\$105	\$754	\$15,578	-	\$15,578
F3XN	Q2	N	7/10/2018	7	201807109115294652	4/1/2018	6/30/2018		\$754	\$0	\$0	\$754	\$15,578	-	\$15,578
F3XN	Q3	N	10/5/2018	11	201810059124319790	7/1/2018	9/30/2018		\$754	\$500,000	\$89,020	\$411,734	\$15,578	-	\$15,578
F3XA	Q3	A	10/31/2018	12	201810319133568771	7/1/2018	9/30/2018		\$754	\$500,000	\$89,020	\$411,734	\$15,578	-	\$15,578
F3XN	12G	N	10/25/2018	13	201810259133323091	10/1/2018	10/17/2018		\$411,734	\$0	\$187,750	\$223,984	\$15,578	-	\$15,578
F3XN	30G	N	12/4/2018	19	201812049133940238	10/18/2018	11/26/2018		\$223,984	\$210,000	\$368,290	\$65,694	\$15,578	-	\$15,578
F3XN	YE	N	1/27/2019	7	201901279144006622	11/27/2018	12/31/2018		\$65,694	\$0	\$0	\$65,694	\$15,578	-	\$15,578
F1A		A	2/22/2018	5	201802229095515540				-	-	-	-	-	-	-
F1A		A	9/5/2018	5	201809059121558466				-	-	-	-	-	-	-
F1A		A	9/5/2018	5	201809059121558471				-	-	-	-	-	-	-
F24N	48		10/16/2018	1	201810169125562738				-	-	-	-	-	-	-
F24N	48		10/16/2018	1	201810169125562739				-	-	-	-	-	-	-
F24N	24		10/29/2018	1	201810299133551862				-	-	-	-	-	-	-
F24N	24		10/29/2018	1	201810299133551863				-	-	-	-	-	-	-
F24N	48		10/5/2018	1	201810059124319335				-	-	-	-	-	-	-

American Values PAC Inc. (C00623371)

2020 July Quarterly Report

24-Hour Report Not Timely Filed

Name of Payee	Date of Dissemination (Schedule E)	Expenditure Amount	Candidate Opposed	Election	24-Hour Report Filed
Great Lakes Strategy	5/26/2020	\$30,000.00 <i>24-Hour Report Required</i>	Steve King	Iowa - 2020 Primary (6/2/2020)	6/15/2020