

RAD Referral 21L-06  
 Denali Leadership PAC  
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**20L-06**

**REPORTS ANALYSIS DIVISION REFERRAL**

**TO**

**ALTERNATIVE DISPUTE RESOLUTION OFFICE**

**DATE:** February 25, 2021

**ANALYST:** Kevin Fortkiewicz

**I. COMMITTEE:**

Denali Leadership PAC  
 C00438291  
 Kimberly VanWyhe, Treasurer 1201  
 Pennsylvania Avenue  
 Suite 800  
 Washington, DC 20004

**II. RELEVANT STATUTE:**

52 U.S.C. § 30104(b)(4)  
 11 CFR § 104.3(b)

**III. BACKGROUND:**

**Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)**

Denali Leadership PAC (“the Committee”) amended its 2020 October Monthly Report to disclose additional disbursements totaling \$100,702.00, which were not disclosed on the original report (Attachment 2).

On October 20, 2020, the Committee filed the original 2020 October Monthly Report, covering the period from September 1, 2020 through September 30, 2020. The report disclosed \$3,005.33 in disbursements on Line 21(b) (Other Federal Operating Expenses) and \$5,000.00 in disbursements on Line 23 (Contributions to Federal Candidates and Committees) of the Detailed Summary Page (Image 202010209297389639).

On November 4, 2020, the Committee filed an Amended 2020 October Monthly Report. The report disclosed \$5,005.33 in disbursements on Line 21(b) and \$103,702.00 in disbursements on Line 23 of the Detailed Summary Page, an overall increase of \$100,702.00 from the original report (Image 202011049336749632).

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On December 17, 2020, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2020 October Monthly Report, received November 4, 2020. The RFAI requested clarification regarding the substantial increase in disbursements disclosed on the Amended 2020 October Monthly Report (Image 202012170300095894).

On January 21, 2021, the Committee filed an FEC Form 99 (Miscellaneous Electronic Submission), which stated:

“In response to the Commission's letter dated December 17th, 2020, Denali PAC outsources its PAC administration and reporting to the outside firm of Williams & Jensen. The firm was responsible for checks that were inadvertently omitted from the initial October monthly report. The firm was not aware of the error until reconciling the October bank statements which reflected the unreported checks. The firm immediately filed an amendment disclosing the disbursements. The firm regrets the error and has implemented additional accounting procedures to ensure future compliance” (Image 202101219405259382).

On February 10, 2021, the Reports Analysis Division (RAD) Analyst called Kimberly VanWyhe, the Committee's Treasurer, regarding the 2020 Amended October Monthly Report and reached her voicemail. The Analyst left a message explaining that the increase in activity on the October Monthly Report may be referred to another Commission office for potential further action (Attachment 3).

Later the same day, Meredith Lesher, the Committee's Consultant, called the RAD Analyst, regarding the potential referral of the Committee. Ms. Lesher said the Committee had filed an FEC Form 99 explaining that it was an accounting error and did not have any additional information to provide. The Analyst explained that the Committee did still have time to provide additional information if it decided to do so (Attachment 3).

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

## O-Index (2021-2022)

Cmte. ID: C00438291 Cmte. Name: DENALI LEADERSHIP PAC

Treasurer Name: VANWYHE, KIMBERLY Address: 1201 PENNSYLVANIA AVENUE SUITE 800, WASHINGTON, DC 20004

Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: D (LEADERSHIP PAC) Filing Frequency: null

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
MS-T			1/21/2021	1	202101219405259382				-	-	-	-	-	-	-
MS-M			2/19/2021	1	202102199428670284				-	-	-	-	-	-	-
<b>Totals</b>										<b>\$0</b>	<b>\$0</b>				

## O-Index (2019-2020)

Cmte. ID: C00438291 Cmte. Name: DENALI LEADERSHIP PAC

Treasurer Name: VANWYHE, KIMBERLY Address: 1201 PENNSYLVANIA AVENUE SUITE 800, WASHINGTON, DC 20004

Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: D (LEADERSHIP PAC) Filing Frequency: null

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
MS-M			2/5/2019	1	201902059145461182				-	-	-	-	-	-	-
MS-O			2/19/2019	2	201902190300032303				-	-	-	-	-	-	-
MS-T			5/13/2019	1	201905139149688085				-	-	-	-	-	-	-
MS-M			2/11/2020	1	202002119186497451				-	-	-	-	-	-	-
MS-O			2/19/2020	2	202002200300058236				-	-	-	-	-	-	-
RQ2	MY	A	9/11/2019	2	201909110300047630	1/1/2019	6/30/2019	9/11/2019	-	-	-	-	-	-	-
RQ2	M10	A	12/17/2020	2	202012170300095894	9/1/2020	9/30/2020	12/17/2020	-	-	-	-	-	-	-
RQ2	30G	N	1/4/2021	2	202101040300099928	10/15/2020	11/23/2020	1/4/2021	-	-	-	-	-	-	-
F3XN	MY	N	7/31/2019	43	201907319161305164	1/1/2019	6/30/2019		\$328,542	\$198,302	\$147,099	\$379,745	-	-	\$0
F3XA	MY	A	8/7/2019	42	201908079161365813	1/1/2019	6/30/2019		\$328,542	\$198,302	\$146,287	\$380,557	-	-	\$0
F3XA	MY	A	10/3/2019	42	201910039163748477	1/1/2019	6/30/2019		\$328,542	\$198,302	\$146,287	\$380,557	-	-	\$0
F3XN	YE	N	1/30/2020	41	202001309182438873	7/1/2019	12/31/2019		\$380,557	\$171,442	\$97,167	\$454,832	-	-	\$0
F3XN	M2	N	2/19/2020	10	202002199186538045	1/1/2020	1/31/2020		\$454,832	\$3,352	\$17,238	\$440,946	-	-	\$0
F3XN	M3	N	3/20/2020	15	202003209204650064	2/1/2020	2/29/2020		\$440,946	\$53,000	\$49,451	\$444,495	-	-	\$0
F3XN	M4	N	4/20/2020	13	202004209220103543	3/1/2020	3/31/2020		\$444,495	\$49,500	\$17,438	\$476,557	-	-	\$0
F3XN	M5	N	5/20/2020	10	202005209232823132	4/1/2020	4/30/2020		\$476,557	\$28,500	\$5,000	\$500,057	-	-	\$0
F3XN	M6	N	6/16/2020	9	202006169239795898	5/1/2020	5/31/2020		\$500,057	\$12,000	\$8,046	\$504,010	-	-	\$0
F3XN	M7	N	7/14/2020	9	202007149244526263	6/1/2020	6/30/2020		\$504,010	\$14,500	\$25,000	\$493,510	-	-	\$0
F3XN	M8	N	8/20/2020	10	202008209261506773	7/1/2020	7/31/2020		\$493,510	\$18,500	\$17,000	\$495,010	-	-	\$0
F3XN	M9	N	9/19/2020	15	202009199275279454	8/1/2020	8/31/2020		\$495,010	\$19,435	\$12,899	\$501,546	-	-	\$0
F3XN	M10	N	10/20/2020	14	202010209297389636	9/1/2020	9/30/2020		\$501,546	\$59,500	\$8,005	\$553,041	-	-	\$0
F3XA	M10	A	11/4/2020	14	202011049336749629	9/1/2020	9/30/2020		\$501,546	\$59,500	\$108,707	\$452,339	-	-	\$0
F3XN	12G	N	10/21/2020	6	202010219326751558	10/1/2020	10/14/2020		\$553,041	\$0	\$250	\$552,791	-	-	\$0
F3XA	12G	A	11/6/2020	6	202011069336972101	10/1/2020	10/14/2020		\$452,339	\$0	\$250	\$452,089	-	-	\$0
F3XN	30G	N	12/3/2020	16	202012039338190792	10/15/2020	11/23/2020		\$452,089	\$74,500	\$36,233	\$490,356	-	-	\$0
F3XA	30G	A	2/8/2021	15	202102089427185934	10/15/2020	11/23/2020		\$452,089	\$74,500	\$36,233	\$490,356	-	-	\$0
F3XN	YE	N	1/29/2021	21	202101299413958140	11/24/2020	12/31/2020		\$490,356	\$29,500	\$58,897	\$460,958	-	-	\$0
<b>F1A</b>		A	8/16/2019	6	201908169162901833				-	-	-	-	-	-	-
<b>Totals</b>									<b>\$732,032</b>	<b>\$599,616</b>					

## O-Index (2017-2018)

Cmte. ID: C00438291 Cmte. Name: DENALI LEADERSHIP PAC

Treasurer Name: VANWYHE, KIMBERLY Address: 1201 PENNSYLVANIA AVENUE SUITE 800, WASHINGTON, DC 20004

Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: D (LEADERSHIP PAC) Filing Frequency: null

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
									-	-	-	-	-	-	-

Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltrr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-M			2/16/2017	1	201702169049701234				-	-	-	-	-	-	-
MS-O			2/22/2017	2	201702220300081237				-	-	-	-	-	-	-
MS-M			2/18/2018	1	201802189094589474				-	-	-	-	-	-	-
MS-O			2/22/2018	2	201802220300101354				-	-	-	-	-	-	-
RQ2	30G	N	2/4/2019	2	201902050300030225	10/18/2018	11/26/2018	2/4/2019	-	-	-	-	-	-	-
RQ2	YE	N	4/7/2019	2	201904070300036656	11/27/2018	12/31/2018	4/7/2019	-	-	-	-	-	-	-
F3XN	MY	N	7/26/2017	24	201707269069824540	1/1/2017	6/30/2017		\$146,784	\$81,727	\$80,608	\$147,903	-	-	\$0
F3XN	YE	N	1/31/2018	44	201801319091046435	7/1/2017	12/31/2017		\$147,903	\$190,876	\$127,637	\$211,142	-	-	\$0
F3XN	M2	N	2/20/2018	9	201802209094639831	1/1/2018	1/31/2018		\$211,142	\$5,000	\$21,338	\$194,804	-	-	\$0
F3XN	M3	N	3/15/2018	10	201803159096560880	2/1/2018	2/28/2018		\$194,804	\$20,750	\$9,547	\$206,006	-	-	\$0
F3XN	M4	N	4/20/2018	13	201804209111716658	3/1/2018	3/31/2018		\$206,006	\$34,194	\$37,467	\$202,733	-	-	\$0
F3XN	M5	N	5/15/2018	9	201805159112038983	4/1/2018	4/30/2018		\$202,733	\$32,000	\$2,000	\$232,733	-	-	\$0
F3XN	M6	N	6/18/2018	11	201806189113741166	5/1/2018	5/31/2018		\$232,733	\$32,250	\$17,000	\$247,983	-	-	\$0
F3XN	M7	N	7/6/2018	7	201807069115242281	6/1/2018	6/30/2018		\$247,983	\$2,500	\$2,000	\$248,483	-	-	\$0
F3XN	M8	N	8/20/2018	10	201808209119995081	7/1/2018	7/31/2018		\$248,483	\$27,750	\$3,401	\$272,831	-	-	\$0
F3XN	M9	N	9/20/2018	7	201809209122036142	8/1/2018	8/31/2018		\$272,831	\$9,500	\$5,038	\$277,293	-	-	\$0
F3XN	M10	N	10/17/2018	14	201810179125571798	9/1/2018	9/30/2018		\$277,293	\$63,250	\$11,250	\$329,293	-	-	\$0
F3XN	12G	N	10/25/2018	10	201810259131028126	10/1/2018	10/17/2018		\$329,293	\$10,500	\$35,000	\$304,793	-	-	\$0
F3XA	12G	A	12/5/2018	11	201812059134167770	10/1/2018	10/17/2018		\$329,293	\$10,500	\$36,668	\$303,124	-	-	\$0
F3XN	30G	N	12/5/2018	16	201812059134167781	10/18/2018	11/26/2018		\$303,124	\$37,400	\$24,349	\$316,174	-	-	\$0
F3XA	30G	A	2/22/2019	15	201902229145578959	10/18/2018	11/26/2018		\$303,124	\$37,400	\$24,349	\$316,174	-	-	\$0
F3XN	YE	N	1/31/2019	15	201901319144478965	11/27/2018	12/31/2018		\$316,174	\$43,884	\$31,516	\$328,542	-	-	\$0
F1A		A	1/10/2018	6	201801109090384705				-	-	-	-	-	-	-
F1A		A	1/8/2018	6	201801089090376879				-	-	-	-	-	-	-
<b>Totals</b>									<b>\$591,582</b>	<b>\$409,824</b>					

**Denali Leadership PAC (C00438291)**

2020 October Monthly Report/Amended 2020 October Monthly Report

Overview of Additional Disbursements

Report Line	Original 2020 October Monthly Report (Image 202010209297 389639)	Amended 2020 October Monthly Report, received 11/4/2020 (Image 202011049336749632)	Variance Amount
Line 21(b): Other Federal Operating Expenses	\$3,005.33	\$5,005.33	\$2,000.00
Line 23: Contributions to Federal Candidates and Committees	\$5,000.00	\$103,702.00	\$98,702.00
<b>Total:</b>			<b>\$100,702.00</b>