

REPORTS ANALYSIS DIVISION REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: May 5, 2022

ANALYST: Andrea Chamorro

I. COMMITTEE: Brady PAC
C00674093
Jeanne Connelly, Treasurer
600 Pennsylvania Ave SE #15180
Washington, DC 20003

II. RELEVANT STATUTE: 52 U.S.C. § 30104(b)
11 CFR §104.3

III. BACKGROUND:

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

Brady PAC (“the Committee”) amended its 2020 30-Day Post-General Report to disclose a debt totaling \$637,615.00 which was not disclosed in the original report (Attachment 1).

On December 1, 2020, the Committee filed the original [2020 30-Day Post-General Report](#) covering the period from October 15, 2020 through November 23, 2020. The report disclosed no debts on Schedule D, Line 10 (Debts and Obligations Owed by the Committee) of the [Summary Page](#) (Attachment 1).

On September 1, 2021, the Committee filed an [Amended 2020 30-Day Post-General Report](#). The report disclosed a \$637,615.00 debt on Schedule D, Line 10 of the Summary Page. The entire \$637,615.00 was disclosed on Schedule D as newly incurred debt for the reporting period.

On October 18, 2021, the Committee filed an [Amended 2020 30-Day Post-General Report](#). The report disclosed no change in total debt from the previous amendment, but clarified the status of the new debt as [disputed](#) (Attachment 1).

RAD Referral 22L-14
Brady PAC
Page 2 of 2

On January 12, 2022, a [Request for Additional Information \(RAFI\)](#) was sent to the Committee referencing the Amended 2020 30-Day Post-General Report, received October 18, 2021. The RAFI requested clarification regarding the substantial increase in debts disclosed in the Amended 2020 30-Day Post-General Report, which were not disclosed in the original filing.

On February 4, 2022, the Committee filed an [FEC Form 99](#) (Miscellaneous Electronic Submission) in response to the RAFI referencing the Amended 2020 30-Day Post-General Report. In part, the Committee stated:

“The additional debts were added to the original reports after it was discovered that these were omitted due to an inadvertent and internal miscommunication between the committee staff and the compliance firm that prepares the reports. Please note that the debt amount reported to Mothership Strategies incurred on 11/1/2020 for \$637,615.00 (with \$470,000 remaining) is in dispute.”

Since February 17, 2022, RAD logged four (4) communications with a representative of the Committee which reflect efforts to help the Committee voluntarily comply with the Act. RAD was able to connect with the committee on one (1) of these occasions and notified Jacqueline Davy, the Committee's Compliance Manager, the matter would be referred to another office at the Commission for further review (Attachment 2).

Filings and correspondence related to the Committee can be found here: [Brady PAC](#). To date, no further communications have been received from the Committee regarding this matter.

Brady PAC (C00674093)

2020 30-Day Post-General Report /Amended 2020 30-Day Post-General Report

Overview of Additional Debt

Report Line	Original 2020 30-Day Post- General Report	Amended 2020 30-Day Post- General Report, Received 10/18/2021	Debt Variance Amount	Actual Increase in New Debts Incurred
Amount Incurred This Period (Schedule D)	\$0.00	\$637,615.00	\$637,615.00	\$637,615.00
Outstanding Balance Beginning This Period (Schedule D)	\$0.00	\$0.00	\$0.00	
Payments This Period (Schedule D)	\$0.00	\$0.00	\$0.00	
Outstanding Balance at Close of This Period (Schedule D)	\$0.00	\$637,615.00	\$637,615.00	
Line 10: Debts and Obligations Owed by the Committee	\$0.00	\$637,615.00	\$637,615.00	

Brady PAC (C00674093)Amended 2020 30-Day Post-General Report, received 10/18/2021Overview of New Debts Incurred

Vendor	Outstanding Beginning Balance	Amount Incurred	Payments	Increase in Debt Incurred
Mothership Strategies	\$0.00	\$637,615.00	\$0.00	\$637,615.00
Total:	\$0.00	\$637,615.00	\$0.00	\$637,615.00