

August 10, 2020

Jonathan S. Berkon  
JBerkon@perkinscoie.com  
D. +1.202.434.1669  
F. +1.202.654.9684

**VIA E-MAIL: AUDIT@FEC.GOV**

Ms. Dayna C. Brown  
Acting Assistant Staff Director  
Audit Division  
Federal Election Commission  
1050 First Street NE  
Washington, DC 20463

**Re: Grassroots Victory PAC Interim Audit Report Findings**

Dear Ms. Brown:

We write as counsel for Grassroots Victory PAC (“GVP” or the “Committee”) in response to the Interim Audit Report (“Report”). The Report, like the preliminary audit findings, buries the lede: the auditors found no new information that the Committee had not already disclosed to the Commission. The only finding is: “A comparison of GVP’s bank activity with its original reports filed with the Commission revealed that disbursements were understated by \$106,674 for calendar years 2017 and 2018.” But, respectfully, it was not the audit that “revealed” this information. It was the Committee’s own proactive amendments in August 2018, long before the audit began. The Report should be modified to reflect that the reports on file when the audit began accurately disclosed the Committee’s financial activity.

As we discussed in our response to the preliminary audit findings, in early 2018, the Committee discovered unreported disbursements for its September, October, and November Monthly 2017 reports and amended those reports. To discover the source of the discrepancies, the Committee hired a compliance firm to review its past reports and financial activities. This review identified additional undisclosed disbursements as well as some previously reported contributions and disbursements that required amendment, and so the Committee amended its reports in August 2018. This audit followed.

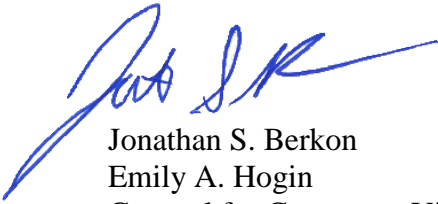
The Report does not explain why the auditors worked from the original reports rather than the amended reports that were on the public record before the audit began. In response to the Committee’s objection, the Report says, “Audit staff compared GVP’s original reports to its bank records to identify the degree to which GVP misstated the activity disclosed on its original filings.” This “explanation” is non-responsive. The Commission did not need an audit to identify

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the degree to which GVP erred in its original reports, because GVP had already informed the Commission of the degree to which it had erred *in its amended reports*.

By focusing on GVP's original reports, the Report presents a distorted picture of GVP's current compliance with its disclosure obligations. The public record was correct before the audit began. The new information that the audit offers the Commission is not that GVP erred in its original reports, but rather that its most current reports are accurate. The Report should be modified to reflect that the Committee accurately disclosed its financial activity, on its own volition, through amended reports that preceded the audit.

Very truly yours,



Jonathan S. Berkon  
Emily A. Hugin  
Counsel for Grassroots Victory PAC

cc: James E. "Trey" Trainor III, Chair  
Steven T. Walther, Vice Chair  
Ellen L. Weintraub, Commissioner  
Nicole Burgess, Audit Manager