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From: FOIA <FOIA@fec.gov>
Cc: Press <Press@fec.gov>
Sent: Thu, Oct 13, 2022 12:52 pm
Subject: Freedom of Information Act Request to the Federal Election Commission (2022-088)
VIA ELECTRONIC MAIL

Re: Your Freedom of Information Act Request to the Federal Election Commission (2022-088)

This email responds to the request you filed for information under the Freedom of Information Act (FOIA) received by the Federal Election Commission's (FEC) FOIA Requester Service Center on June 16, 2022. Specifically, you requested the following documents:

Agenda Document No. X17-07 dated January 31, 2017 for meeting 2-7-17.
Agenda Document No. X17-15 dated April 28, 2017 for meeting of 5-9-17.
Agenda Document No. X17-23 dated July 31, 2017, for meeting of 8-15-17.
Agenda Document No. X17-38 dated October 31, 2017 for meeting of 11-7-17.
Agenda Document No. X18-04 dated January 31, 2018 for meeting of 2-6-18.
Agenda Document No. X18-21 dated April 30, 2018 for meeting of 05-8-18.
Agenda Document No. X18-40 dated July 31, 2018 for meeting of 8-7-18.
Agenda Document No. X18-59 dated October 31, 2018, for meeting of 11-8-18.
Agenda Document No. X19-06 dated February 28, 2019 for meeting of 3-19-19.
Agenda Document No. X19-15 dated April 30, 2019 for meeting of 05-7-19.
Agenda Document No. X19-31 dated July 31, 2019, for meeting of 08-20-19.
Agenda Document No. X19-36 dated October 31, 2019 for meeting of 11-19-19.
Agenda Document No. X20-02 dated January 30, 2020 for meeting of 02-11-20.
Agenda Document No. X20-17 dated April 30, 2020 for meeting of 05-12-20.
Agenda Document No. X20-36 dated July 31, 2020 for the meeting of 08-18-20.
Agenda Document No. X20-49 dated October 30, 2020 for meeting of 11-10-20.
Agenda Document No. X21-06 dated January 29, 2021 for the meeting of 02-09-21.
Agenda Document No. X21-16 dated April 30, 2021 for the meeting of 05-04-21.
Agenda Document No. X21-24 dated July 30, 2021 for meeting of 08-10-21.
Agenda Document No. X21-34 dated October 29, 2021 for meeting of 11-9-21.
Agenda Document No. X22-04 dated January 31, 2022 for meeting of 02-15-22.

We have searched our records and located responsive documents. Attached is a 681-page pdf containing records responsive to your request.

These records contain redactions pursuant FOIA Exemptions 3(A), 5, and (7)(E). FOIA Exemption 3(A) protects from disclosure information that is specifically exempted from disclosure by statute. See 5 U.S.C. § 552(b)(3)(A). Pursuant to the Federal Election Campaign Act, the FEC may not disclose information related to open enforcement matters. 52 U.S.C. § 30109(a)(12). FOIA Exemption 5 protects from disclosure inter- or intra-agency memoranda or letters that would not be available by law to a party other than an agency in litigation with the agency, including documents covered by the attorney work-product, deliberative process, and attorney-client privileges. See 5 U.S.C. § 552(b)(5). And FOIA Exemption 7(E) protects law enforcement information that “would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law.” 5 U.S.C. § 552(b)(7)(E).

Therefore, your FOIA request has been granted in part.

You may contact our FOIA Public Liaison, Christine McClarin, at (202) 694-1485 for any further assistance and to discuss any aspect of your request. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

You may appeal any adverse FOIA determination. Any such appeal must be filed in writing and should follow the guidelines set forth in 11 C.F.R. § 4.8. If you have any questions, please contact the FOIA Requester Service Center at FOIA@fec.gov, or (202) 694-1650.

Sincerely,

Steve N. Hajjar
FOIA Requester Service Center

SENSITIVE

AGENDA ITEM

For Meeting of 2-7-17



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 31, 2017

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer
Staff Director *AP*

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Lynn Fraser *LF*
Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Thomas Hintermister *TH*
Assistant Staff Director
Audit Division

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2017 - 1st Quarter Highlights (10/1/16 - 12/31/16) & FY Statistical Overview

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the first quarter (10/1/16 - 12/31/16) and 2017 fiscal year statistical overview. The intent of this document is to proactively provide an update of the workload and achieved results of the Compliance Office on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during the February 7, 2017 Executive Session.

The attached **Appendix A** provides the Commission with second quarter highlights for each office and also a statistical overview of FY 2017 results and progression towards meeting the 2014-2019 Strategic Performance Goals recently adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled 'Proposed Final Audit Report – Due Date' which highlights the report manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2017 statistics for meeting strategic performance goals related to the Administrative Fine Program.

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the overview.

Alternative Dispute Resolution Office (ADRO)

In the first quarter of FY 2017, the ADRO received 6 cases (3 from RAD and 3 from OGC). During this time period, the ADRO closed a total of 6 cases, 5 with approved negotiated settlements and 1 case was withdrawn by RAD. (b) (7)(E)

(b) (7)(E)

The ADRO continued to work with the Office of Chief Information Officer (OCIO) regarding the upgrade of the case management system (Law Manager), which was implemented last July. The ADRO anticipates that work will begin on integrating automated mail merge technology with the system in the 2017 fiscal year.

The ADRO remained active in providing skill building in conflict management, in large part by providing Conflict Coaching to FEC staff and lunch time mini-seminars on conflict management. Conflict coaching can assist in decreasing the negative effects of conflict in the workplace. The ADRO staff continues interagency conflict coaching discussions to share lessons learned with those federal agencies setting up conflict coaching programs. The ADRO staff continues to serve on the steering committee of the Federal Interagency ADR Working Group. In addition, both the Director and Assistant Director serve on the roster of Sharing Neutrals, an interagency mediation program which provides trained mediators to participating Federal agencies to resolve workplace disputes as workload considerations allow. Sharing Neutrals provides mediation services to resolve workplace disputes at no cost to the Commission in exchange for the ADRO staff's service.

Administrative Fine Program (Office of Administrative Review)

During the first quarter of FY 2017, the Commission processed 83 Reason to Believe (RTB) findings. OAR received 15 challenges and processed 11 Reviewing Officer Recommendations (RORs). The Commission made a final determination that the respondents in

31 cases violated 2 U.S.C. § 30104(a) and assessed penalties totaling \$70,530. The Commission also collected \$26,843 in fine payments and prepared 31 cases for public release.

As of January 31, 2017 the Commission has approved a total of 3,064 RTB findings and 2,949 final determination recommendations. The AFP has collected \$4.55 million in 2,435 cases, received 735 challenges, and publicly released 2,918 cases. Of the 735 challenges, the Commission upheld 441 of the RTB findings (60%) with no change in the fine, upheld 120 of the RTB findings (16%) with fines changed, and waived 157 fines (21%). As of January 31, the Commission had not yet made a final determination in the 15 remaining cases.

(b) (7)(E)

(b) (7)(E) Additionally, the Office of Administrative Review (OAR) forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

The Reviewing Officer also worked with OCIO and RAD to modify the multiple AF Penalty Calculators pursuant to the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015. The annual adjustments will become effective upon publication in the Federal Register.

Audit Division

During the first quarter of FY 2017, the Audit Division processed the following audit reports:

	Audit Report Stage	Number of Reports
Released to Public	Final Audit Report	0
Sent to the Committee	Interim Audit Report	3
	Draft Final Audit Report	3
Circulated to the Commission	Interim Audit Report	3
	Audit Division Recommendation Memorandum	2
	Proposed Final Audit Reports	2
Forwarded to OGC	Interim Audit Report	2
	Draft Final Audit Report	3
	Audit Division Recommendation Memorandum	2

Fieldwork is currently ongoing for five audits (Michigan Democratic State Central Committee, Democratic Party of South Carolina, Democratic Party of Arkansas, Arizona Republican Party and Massachusetts Democratic State Cmte-Fed Funds Acct) and the Audit Division has 20 open audits. One audit hearing was held for the Colorado Republican

Committee. Additionally, the Perdue for Senate committee has filed a Request for Legal Consideration by the Commission, which the Commission has granted. Pre-audit began on both Title 26 audits (Jill Stein for President and O'Malley for President).

With respect to the Presidential Election Campaign Fund, the Audit Division processed the fourth submission from the Jill Stein for President Committee; no further submissions are expected. The Audit Division worked with the Office of General Counsel to provide guidance to the Gary Johnson 2016 Committee regarding general election public funding. The Committee, however, did not qualify for the public funding. Also, the Audit Division received the annual request from the U.S. Treasury for the Estimated Outlay for the fiscal years 2017-2027. The Audit Division completed, and, in early January 2017, the Commission approved, the budgetary calculations which were subsequently forwarded to the U.S. Treasury.

The Audit Division is collaborating with OCIO on deployment of new laptops, which is scheduled for February. Additionally, the Audit Division staff has been conducting user acceptance testing on a website protocol that will allow committees to download documents to an agency server, which will allow for greater protection of PII information.

The Audit Division has also been conducting focus groups seeking staff input on methods to decrease the turnaround time for audits and overall improvements within the audit process. The Audit Division also completed its annual training on the FEC Quality Standards, which sets standards for quality audit work across audit teams. Audit Managers met with auditors to develop individual training plans for the year. Additionally, Audit staff presented an overview of the Audit Division for RAD in an effort to address feedback received from the morale study.

Reports Analysis Division (RAD)

During the first quarter of FY 2017, RAD staff collaborated with OCIO on the development of the Correspondence Tracking System, which will allow Campaign Finance Analysts to assist committees with questions via email through an approval and tracking system. We are near the end of development and expect to begin user testing in early February, with an anticipated roll out in early March. The system will be accessible to the public through the FEC's new website which is also scheduled to go live in March. In addition, RAD staff sought comments from Commission Offices on the proposed 2017-2018 RAD Review and Referral Procedures and met with several offices to go over the proposed changes. The document has been circulated to the Commission for a vote.

RAD staff reviewed a total of 25,635 documents totaling 5,184,086 pages during the first quarter of FY 2017 and 88.40% of the reports have been reviewed within 90 days of receipt for the current election cycle (Appendix A, page 12), exceeding our goal of 75%. RAD generated and sent 5,538 letters to the filing community during the first quarter and for FY 2017, 91% of RFAs were sent within 40 days of the report review date (Appendix A, page 14). Also during the first quarter, RAD generated 10 referrals (1 OGC, 3 ADRO, 5 AF, 1 Debt Settlement) and sent 3,356 non-filer notices, where the Commission approved recommendations to publish 38 authorized committees for failure to timely file an election-sensitive report. Finally, during the first quarter, Reports Processing Branch staff coded 7,276,270 transactions from 4,220

documents, and processed 451,515 pages from 3,973 documents in the Paper Automation system.

RAD staff continued to assist other divisions when asked with inquiries regarding committee activity or RAD procedures, as well as document review. Specifically, during the first quarter, RAD staff provided assistance to OGC on 27 matters by offering comments on FGCR's, as well as answering questions regarding RAD procedures and disclosure requirements, assisted ADRO with 9 matters, assisted the Press Office with 3 matters, handled 4 inquiries from Audit, and 12 inquiries from Commission offices.

On the personnel front, RAD has experienced several recent staff departures. As a result of internal job postings, two Campaign Finance Analysts (CFA) will be taking positions in the Information Division in February, and another analyst left the agency, resulting in a shortage of three (3) CFAs. We were in the process of reviewing applications to fill a previously approved CFA vacancy and will continue this process. In addition, we saw the departure of a recently hired Secretary for which we were unable to hire a replacement or to conduct applicant interviews to fill two (2) Coding Clerk positions before the hiring freeze was issued.

Finally, during the first quarter, RAD Managers committed a significant amount of time to addressing feedback received from a morale study team exercise conducted at our last division meeting. One of the items implemented, includes issuing a monthly RAD newsletter to highlight division and agency news and to ensure everyone is getting the same information at the same time. We have also scheduled overview sessions with other divisions to address requests to learn more about other functions within the agency, as well as brown bag lunches with Commissioners and staff to allow for a collegial discussion about current issues. In addition, we held an Individual Development Plan (IDP) session for those interested in professional development and are planning a Professional Development week in RAD where training and resources will be offered. Further, all RAD managers received OPM 360 Leadership Assessment results and are in the process of creating Leadership Development Plans.

Attachments

Appendix A, FY 2017 Highlights and FY Overview for Office of Compliance Goals

Appendix B, Open Audits Report

Appendix C, Proposed Final Audit Report – Due Date

Appendix D, ADRO Civil Penalty Report

Appendix E, AF Performance Goals Report

Office of Compliance - ADRO, OAR, Audit & RAD

**Fiscal Year 2017
1st Quarter Highlights &
Statistical Overview
(10/1/16 – 12/31/16)**

Alternative Dispute Resolution Office

FY 2017 – 1st Quarter Highlights

- **(b) (7)(E)**
- Continued to work with the OCIO on upgrades to the case management database, Law Manager.
- Worked with OCS on revisions to the ADRO records management schedule.
- Assistant Director served on Data Act Project Executive Team and Records Scheduling Project Team.
- The ADRO continued to provide the Conflict Coaching program to all FEC staff.
- Conflict Coaches hosted a lunchtime seminar and open house for International Conflict Resolution Day.
- As part of the Interagency ADR Working Group, the Director and the Assistant Director serve as mediators for Sharing Neutrals as a collateral duty. In exchange the Commission receives mediation services for work place disputes at no cost.

Alternative Dispute Resolution Office

(b) (7)(E)

FY	2009	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 - 12/31/16)
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(b) (7)(E)

Internal Processing Days (avg.)	N/A	N/A	N/A	N/A	70.5	124	116	113	135
Percentage to Goal	N/A	N/A	N/A	N/A	100%	95%	100%	100%	100%
Penalties Assessed	\$198,395	\$93,100	\$43,950	\$140,126	\$36,850	\$255,381	\$141,079	\$58,800	\$26,725
Penalties Collected	\$197,495	\$93,100	\$48,700	\$138,126	\$26,600	\$193,281	\$187,383	\$59,445.78	\$27,125

Office of Administrative Review

FY 2017 – 1st Quarter Highlights

- Processed 11 Reviewing Officer Recommendations in an average of 50.36 days
- Commission approved 6 Final Determination Recommendations
- \$26,843 in fine payments collected
- Transferred 3 cases to Treasury for debt collection
- Began working with OCFO to modify AF financial reports to accommodate process changes and increase efficiency.
- Collaborated with OCIO and RAD to modify AF penalty calculators for annual inflation adjustments. To become effective upon publication in the Federal Register.

Office of Administrative Review

(b) (7)(E)

FY	2009	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 - 12/31/16)
Challenges Received	67	11	60	11	26	6	35	12	15
Challenges Closed (FD)	67	9	60	10	31	5	32	11	6
Total Processing Days (avg.)	70	38.77	53.15	46.89	29.86	32.5	48.56	58	50.36
Percentage to Goal	60%	100%	100%	100%	93%	100%	97%	81.8%	100%
Fines Assessed (Inclusive of RAD)	\$463,232	\$57,237	\$428,434	\$142,960	\$627,40*	\$139,223	\$290,173	\$133,758	\$70,530
Fines Paid (Inclusive of RAD)	\$388,397	\$90,646	\$344,017	\$101,636	\$540,27*	\$94,171	\$199,948	\$123,838	\$26,843

*Note: Includes \$191,135 civil money penalty for AF# 2512 (Obama for America) as included in Conciliation Agreement for MURs 6078, 6090, 6108, 6139, 6142 and 6214, and AF# 2512. Includes \$20,000 civil money penalty for AF# 2638 (McCain-Palin Compliance Fund Inc.) as included in Conciliation Agreement for MUR 6112.



Challenge Review Queue

(Confidential and Sensitive)

AF #	ID	Name	Committee	Report		Reason To Believe		Challenge		Reviewed By Date
				Year	Type	Date	Fine	Rcpt Date	Basis	
3163	C00610113	CARLOS BERUFF FOR SENATE INC		2016	Q3	12/09/2016	\$10,382	12/27/2016	Best Efforts (old regs)	02/25/2017
3212	C00573923	PURSUING AMERICA'S GREATNESS		2016	12G	12/16/2016	\$771	01/09/2017	SA	03/10/2017
3169	C00593103	FRAZIER FOR COLORADO INC		2016	Q3	12/09/2016	\$8,885	01/23/2017	LOA	03/24/2017
3215	C00402826	SAN DIEGO COUNTY DEMOCRATIC PARTY (FED ACCT)		2016	12G	12/16/2016	\$8,201	01/23/2017	Committee computer/s oftware/intemet issues/Con tractor/Ven der Error/Histo ry of Complianc e	03/24/2017

4 Total Cases to Be Reviewed

Audit Division

FY 2017 – 1st Quarter Highlights

- 5 Audits are currently in Fieldwork
- Held one Audit Hearing
- Collaborated with OGC to generate a Directive 69 Legal Guidance Report for the Commission.
- Audit staff attended FEC webinars and internal training sessions
- Held monthly Audit Staff Meetings
- Vetted Press Releases about audit reports and matching fund submissions for the Press Office
- Audit staff participated on the Lease Renewal Advisory Team and associated committees for the FEC move
- Focus groups held within the division seeking staff input on methods to decrease the turnaround time for audits and overall improvements within the audit process

(b) (7)(E)

Reports Analysis Division

FY 2017 – 1st Quarter Highlights

- **(b) (7)(E)**
- Reviewed **25,635** documents totaling **5,184,086** pages
- Sent out **5,538** letters and handled **3,966** calls
- Generated **10** referrals (1 OGC, 3 ADRO, 5 AF, 1 Debt Settlement)
- Coded **7,276,270** transactions from **4,220** documents
- RAD staff conducted workshops for one Reporting Webinar and the COGEL conference
- Analysts provided extended phone coverage for the 2016 October Quarterly, 12 Day Pre-General, and 30 Day Post-General Report filing deadlines
- RAD managers handled OGC inquiries for 27 matters by providing comments on FGCR's and/or answering questions, assisted ADRO with 9 matters, handled 12 inquiries from Commission Offices, 4 inquiries from Audit and 3 inquiries from the Press Office
- RAD staff collaborated with OCIO on the development of the Correspondence Tracking Project
- The RAD Management team participated in OPM's 360 Leadership Assessment
- RAD staff participated on the Lease Renewal Advisory Team and associated committees for the FEC move
- Circulated the Proposed 2017-2018 RAD Review & Referral Procedures to Commission offices for comment
- Held a division meeting and conducted a morale study team activity

Reports Analysis Division

Strategic Plan Performance Measurement: 95% of Reports Coded and Entered within 30 Days of Receipt

Fiscal Year	2015	2016	2017 (10/1/16 – 12/31/16)
Number of Documents Coded	56,327	53,107	4,220
Number of Transactions Coded	23,957,421	19,385,479	7,276,270
% of Paper Filed Reports Made Available to the Public within 2 Business Days of Receipt	91.4%	99.1%	98.6%
% of Reports Coded and Entered within 30 Days of Receipt	91.5%	99.9%	90%

Reports Analysis Division

Fiscal Year Summary for Paper Automation System

Fiscal Year	2017 (10/1/16 - 12/31/16)
Documents Processed	3,973
Total Pages Processed	451,515
Total Repairs Made	3,203

Reports Analysis Division

Strategic Plan Performance Measurement: 75% of Reports reviewed within 90 days of receipt

Election Cycle	2008	2010	2012	2014	2016 (Election Cycle to Date)
Documents Reviewed	146,220	142,231	144,943	180,975	136,138
Average Review Days Required per Report	52.80	51.53	55.31	43.31	28.96
Total Page Count of Documents Reviewed	14,112,885	8,792,843	15,634,938	23,798,740	30,762,051
% of Reports Reviewed within 90 Days	81.75%	82.72%	80.77%	77.18%	91.95%

*88.40% of Reports Reviewed within 90 Days of receipt for first quarter of FY 2017 (10/1/2016-12/31/2016)

Reports Analysis Division

Fiscal Year Overview of Key RAD Deliverables

Fiscal Year	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 – 12/31/16)
Tracked Letters Sent	8,889	10,247	8,346	13,205	8,569	11,483	11,183	4,892
Untracked Letters Sent	1,429	1,868	1,853	2,338	1,651	1,950	2,070	646
Referrals	31	89	99	88	59	91	43	10
Admin Fines RTB/FD	75/38	309/272	69/36	194/184	70/55	191/159	83/33	83/25
Telephone Calls Handled	13,923	14,502	16,265	14,254	10,673	11,822	12,362	3,966

Reports Analysis Division

**Strategic Plan Performance Measurement: 75% of RFAI's sent within
40 days of Report Review**

Fiscal Year	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 – 12/31/16)
Number of RFAIs Sent	6,509	5,992	5,310	6,322	4,469	4,694	5,206	1,451
% of RFAIs Sent within 40 Days of Report Review	87%	76%	63%	72%	84%	92%	92%	91%

Reports Analysis Division

(b) (7)(E)

FY	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 – 12/31/16)
Total AF Reports Generated	63	45	98	56	95	46	66	16
Average Processing Days	46.7	52.1	40.5	56.9	55.3	58.7	54.5	50.2
(b) (7)(E)	63	45	98	51	92	43	66	16
Percentage to Goal	100%	100%	100%	91.07%	96.84%	93.48%	100%	100%



Open Audits

As of 1/31/2017

(Confidential and Sensitive)

			<u>Date of Last Action</u>	<u>Audit Manager</u>	<u>Report Track</u>
Pre-Audit					
2016	JILL STEIN FOR PRESIDENT	C00581199	11/30/2016	Burgess	B
2016	O'MALLEY FOR PRESIDENT	C00578658	11/30/2016	Pacious	B
					Total - 2
Fieldwork					
2014	DEMOCRATIC PARTY OF SOUTH CAROLINA	C00007658	04/18/2016	Burgess	B
2014	DEMOCRATIC PARTY OF ARKANSAS	C00024372	05/02/2016	Morcomb	B
2014	ARIZONA REPUBLICAN PARTY	C00008227	05/18/2016	Favin	B
2014	MASSACHUSETTS DEMOCRATIC STATE CMTE - FED FUNDS ACCT	C00089243	06/08/2016	Smith	B
2014	MICHIGAN DEMOCRATIC STATE CENTRAL COMMITTEE	C00031054	08/22/2016	Kodish	B
					Total - 5
Interim/Preliminary Report Writing					
2014	MCSALLY FOR CONGRESS	C00512236	05/11/2016	Pacious	B
2014	PERDUE FOR SENATE	C00547570	12/02/2016	Smith	B
					Total - 2
Interim/Preliminary Audit Report Committee Response Period					
2014	AMERICAN FINANCIAL SERVICES ASSOCIATION PAC	C00038604	12/06/2016	Kodish	B
					Total - 1
Draft Final Audit Report Writing					
2012	CONSERVATIVE MAJORITY FUND	C00524454	12/07/2016	Morcomb	B
2012	DEMOCRATIC PARTY OF HAWAII	C00212787	12/12/2016	Kodish	B
2012	FREEDOM'S DEFENSE FUND	C00401786	12/27/2016	Favin	B
2012	TED CRUZ FOR SENATE	C00492785	01/10/2017	Kodish	B
					Total - 4
Audit Division Recommendation Memorandum Writing					
2012	COLORADO REPUBLICAN COMMITTEE	C00033134	12/06/2016	Pacious	B
					Total - 1
Audits in OGC					
2012	NEW YORK REPUBLICAN FEDERAL CAMPAIGN COMMITTEE	C00055582	IAR 11/22/2016	Burgess	B
2012	ILLINOIS REPUBLICAN PARTY	C00005926	DFAR 12/19/2016	Favin	B
					Total - 2
Audits with the Commission					
2014	KIND FOR CONGRESS COMMITTEE	C00312017	ADRM 01/04/2017	Smith	B
2012	KANSAS DEMOCRATIC PARTY	C00019380	ADRM 01/11/2017	Burgess	B
2012	CONSERVATIVE CAMPAIGN COMMITTEE	C00495010	PFAR 01/24/2017	Morcomb	B
					Total - 3



Open Audits

As of 1/31/2017

(Confidential and Sensitive)

20 Open Audits

Legend

Track A	Audits with <u>no</u> unresolved legal issues
Track B	State/Local Party audits with findings PAC audits with unresolved legal issues Authorized audits with unresolved legal issues
Track C	Audits with <u>no</u> findings
IAR	Interim Audit Report
PAR	Preliminary Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report
Text	If text is red, the report has not been sent to OGC for a legal analysis



Open Audits
As of 1/31/2017
(Confidential and Sensitive)

Audit Caseload

<u>Audit Manager</u>	<u>Number of Audits</u>	<u>Percent of Total Audits</u> ¹
Burgess	4	20%
Favin	3	15%
Kodish	4	20%
Morcomb	3	15%
Pacious	3	15%
Smith	3	15%
Totals	20	100%

¹ May not total 100% due to rounding

Comments

2014

Kind for Congress Committee
(b) (5)

Perdue for Senate
(b) (5)



Proposed Final Audit Report - Due Date

As of 1/31/2017

(Confidential and Sensitive)

	<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2012 TED CRUZ FOR SENATE	Kodish	DFAR	Report Writing	04/30/2013
2012 DEMOCRATIC PARTY OF HAWAII	Kodish	DFAR	Report Writing	10/21/2013
2012 COLORADO REPUBLICAN COMMITTEE	Pacious	ADRM	Memorandum Writing	10/21/2013
2012 NEW YORK REPUBLICAN FEDERAL CAMPAIGN COMMITTEE	Burgess	IAR	OGC Reviewing	10/21/2013
2012 FREEDOM'S DEFENSE FUND	Favin	DFAR	Report Writing	02/03/2014
2012 CONSERVATIVE MAJORITY FUND	Lmorcomb	DFAR	Report Writing	02/05/2014
2012 ILLINOIS REPUBLICAN PARTY	Favin	DFAR	OGC Reviewing	10/21/2013
2012 CONSERVATIVE CAMPAIGN COMMITTEE	Lmorcomb	PFAR	Circulated to Commission	02/04/2014
2012 KANSAS DEMOCRATIC PARTY	Burgess	ADRM	Circulated to Commission	10/21/2013
2014 PERDUE FOR SENATE	Smith	IAR	Report Writing	04/24/2015
2014 MCSALLY FOR CONGRESS	Pacious	IAR	Report Writing	04/24/2015
2014 KIND FOR CONGRESS COMMITTEE	Smith	ADRM	Circulated to Commission	04/24/2015
2014 AMERICAN FINANCIAL SERVICES ASSOCIATION PAC	Kodish	IAR	Committee Response Period	11/18/2015
2014 DEMOCRATIC PARTY OF SOUTH CAROLINA	Burgess		Fieldwork	11/18/2015
2014 ARIZONA REPUBLICAN PARTY	Favin		Fieldwork	11/18/2015
2014 DEMOCRATIC PARTY OF ARKANSAS	Lmorcomb		Fieldwork	11/18/2015
2014 MICHIGAN DEMOCRATIC STATE CENTRAL COMMITTEE	Kodish		Fieldwork	11/18/2015
2014 MASSACHUSETTS DEMOCRATIC STATE CMTE - FED FUNDS ACCT	Smith		Fieldwork	11/18/2015
2016 O'MALLEY FOR PRESIDENT	Pacious		Pre-Audit	11/30/2016
2016 JILL STEIN FOR PRESIDENT	Burgess		Pre-Audit	11/30/2016

(b) (7)(E)



Proposed Final Audit Report - Due Date

As of 1/31/2017

(Confidential and Sensitive)

20 Open Audits

Legend

IAR	Interim Audit Report
PAR	Preliminary Audit Report
DFAR	Draft Final Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year: 10/01/2015 To: 09/30/2017

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY -2016	757	Friends of Clyde Holloway for Congress Guillot, Felix	\$0.00	10/19/2015	\$0.00	10/19/2015	\$0.00	Attend FEC seminar	10/19/2016	01/20/2016
	759	All Citizens for Mississippi Vann, Jacqueline	\$2,000.00	10/27/2016	\$500.00	02/07/2015	\$1,500.00	Attend FEC seminar	10/27/2016	
	760	Dewhurst for Texas	\$0.00	03/02/2017		03/02/2017		Committee will file for termination	03/02/2017	
	764	Dewhurst for Texas	\$0.00	03/02/2017		03/02/2017		Committee will file for termination	03/02/2017	
	765	Texans for a Conservative Majority Cubriel, Randy	\$6,150.00	11/21/2015	\$6,150.00	11/02/2015	\$0.00	Conduct & certify internal audit/reconciliation Conduct internal education program for employees or staff	11/21/2016 11/21/2015	10/24/2016 12/15/2015
	767	Joe Carr for Senate Schott, Nate	\$2,250.00	12/18/2015	\$2,250.00	12/17/2015	\$0.00	Committee will file for termination	01/17/2016	08/16/2016
	769	Adkins, Mary Rose National Rifle Association (NRA) of America Political Victory Fund Adkins, Mary Rose National Rifle Association (NRA) of America Political Victory Fund	\$2,750.00	12/02/2015	\$2,750.00	11/19/2015	\$0.00	Conduct & certify internal audit/reconciliation	11/02/2016 11/02/2017	11/14/2016
	772	Lisker, Lisa	\$0.00	08/01/2016				Committee will file for termination	08/01/2016	08/01/2016

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
		Newt 2012						Committee will file for termination	08/01/2016	08/01/2016
	775	May, Jennifer Marjorie 2014	\$0.00	05/24/2016				Committee will file for termination		
	777	Massachusetts Republican Party Anderson, Brent	\$4,500.00	02/07/2016	\$4,500.00	02/05/2016	\$0.00	Conduct & certify internal audit/reconciliation	02/08/2017	06/03/2016
	778	Ohio Republican Party State Central & Executive Committee Armstrong, Maria	\$3,000.00	01/18/2016	\$3,000.00	01/15/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	12/18/2016 03/18/2016	11/14/2016 02/17/2016
	781	Sharon Sund for Congress Roberson, Eugene	\$0.00	05/24/2016				File amended reports Participate in conference call on requirements of FECA	03/28/2016 03/10/2016	06/30/2016 06/30/2016
	782	VANILA SINGH FOR CONGRESS 2014	\$2,300.00	04/19/2016	\$2,300.00	04/08/2016	\$0.00	Committee will file for termination	07/19/2016	03/07/2016
	784	McConnell Senate Committee '14 McConnell Senate Committee '14	\$0.00	05/24/2016				Other	04/25/2016	04/29/2016
	785	Lisker, Lisa House Conservatives Fund	\$0.00	05/24/2016				Develop and enforce internal controls File amended reports	04/21/2016 03/21/2017	03/22/2016
	786	David Vitter for U.S. Senate David Vitter for U.S. Senate David Vitter for U.S. Senate	\$0.00	05/24/2016				Other	03/23/2017 04/25/2016	04/01/2016
	787	Mackenzie, Scott B. Conservative Majority Fund	\$3,500.00	08/11/2016	\$3,500.00	07/26/2016	\$0.00	Attend FEC seminar File amended reports	07/12/2017 08/11/2016	

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	788	Conservative Campaign Committee	\$4,750.00	10/19/2016	\$4,750.00	11/21/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	04/09/2017 07/19/2016	09/07/2016
	789	Democratic Party Of Hawaii Kong Kee, Florence L.	\$6,375.00	10/28/2016	\$6,375.00	11/08/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	04/28/2017 07/28/2017	
	792	Oakland County Democratic Party	\$10,000.00	11/18/2016	\$10,000.00	09/19/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	05/19/2017 08/19/2016	09/01/2016
	793	Ohio Democratic Party Alberty, Fran	\$3,850.00	07/02/2016	\$3,850.00	07/01/2016	\$0.00	Attend FEC seminar	06/02/2017	
	798	Cotton for Senate	\$2,000.00	09/10/2016	\$2,000.00	08/24/2016	\$0.00	Develop a FEC Compliance Manual	11/10/2016	11/08/2016
	799	Utah State Democrat Committee-Federal Corroon, Peter Utah State Democrat Committee-Federal Corroon, Peter	\$1,550.00	10/10/2016	\$1,550.00	08/24/2016	\$0.00	Other	08/11/2016 08/10/2016	08/10/2016
	802	Right to Rise PAC, Inc	\$2,400.00	10/07/2016	\$2,400.00	07/08/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	09/08/2017 12/08/2016	06/22/2016 07/08/2016
	807	Voelter, Dathan Keep the Promise PAC	\$1,425.00	10/22/2016	\$1,425.00	11/01/2016	\$0.00	Committee will file for termination	12/21/2016	
Sub-Total : FY -2016			\$58,800.00		\$57,300.00		\$1,500.00			
FY -2017	791	Oklahoma Leadership Council Hodges, Peter Leo	\$8,750.00	10/12/2017				Attend FEC seminar	04/12/2018	
	800	The 2016 Draft Committee (f/k/a National Draft Ben Carson for President Committee)	\$11,000.00	12/14/2016	\$11,000.00	11/01/2016	\$0.00	Committee will file for termination	04/14/2017	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	803	Majority Committee PAC—MC PAC Thomson, Jill	\$1,575.00	12/14/2016	\$1,575.00	11/23/2016	\$0.00	Attend FEC seminar Other	11/14/2017 12/14/2016	 01/25/2017
	805	Reiff, Neil P., Esq. VoteVets.org Action Fund	\$2,000.00	01/04/2017	\$2,000.00	12/28/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	12/07/2017 03/05/2017	
	806	Rodney for Congress	\$3,400.00	11/24/2016				Attend FEC seminar Develop a FEC Compliance Manual	10/24/2017 02/24/2017	
Sub-Total : FY -2017			\$26,725.00		\$14,575.00		\$0.00			
Grand Total :			\$85,525.00		\$71,875.00		\$1,500.00			



AF Performance Goals

Print Date: January 31, 2017

Selected Parameters:

Office: Both

Start Date: 10/01/2016

End Date: 12/31/2016

*Exception: YES



AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date
Processed					
2016	12G	AUTH	Y	10/27/2016	12/12/2016
2016	12G	UNAUTH_M	Y	10/27/2016	12/12/2016
2016	Q3	H_S_P_UNAUTH	N	10/15/2016	12/06/2016
2016	Q3	H_S_P_UNAUTH	Y	10/15/2016	12/06/2016
2016	M9	P_UNAUTH	N	09/20/2016	11/15/2016
2016	M8	P_UNAUTH	N	08/20/2016	10/17/2016

Total AF Reports Processed 6

Average Processing Days 51.67

(b) (7)(E)

Percentage to Goal 100.00%

Processed - No committees

					Action Date
2016	12GR	AUTH	Y	11/10/2016	12/12/2016
2016	12SG	AUTH	Y	10/27/2016	12/07/2016
2016	M10	P_UNAUTH	N	10/20/2016	12/07/2016
2016	M10	P_UNAUTH	Y	10/20/2016	12/07/2016
2016	12P	AUTH	Y	09/01/2016	10/27/2016
2016	12SP	AUTH	Y	09/01/2016	10/27/2016
2016	12P	AUTH	Y	08/27/2016	10/20/2016
2016	12P	AUTH	Y	08/18/2016	10/17/2016
2016	12P	AUTH	Y	08/15/2016	10/03/2016
2016	12PR	AUTH	Y	08/15/2016	10/03/2016

(b) (7)(E)



AF Performance Goals

(Confidential and Sensitive)

Total AF Reports Processed-No Committees	10
Average Processing Days	49.30
(b) (7)(E)	
Percentage to Goal	100.00%

Total AF Reports	16
Average Processing Days	50.19
(b) (7)(E)	
Percentage to Goal	100.00%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters
RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2016	Q1	3067	C00432096	09/06/2016	11/02/2016	57	Y
2016	12P	3086	C00559492	09/08/2016	11/03/2016	56	Y
2016	48H	3089	C00592659	10/04/2016	11/16/2016	43	Y
2016	Q2	3118	C00588756	10/24/2016	11/16/2016	23	Y
2016	Q2	3124	C00612929	10/25/2016	12/13/2016	49	Y
2016	Q2	3125	C00607564	10/24/2016	12/15/2016	52	Y
2016	Q2	3128	C00586578	10/25/2016	12/15/2016	51	Y
2016	Q2	3130	C00606897	10/25/2016	12/15/2016	51	Y
2016	Q2	3131	C00565598	10/25/2016	12/20/2016	56	Y
2016	Q2	3138	C00520064	10/31/2016	12/28/2016	58	Y
2016	M7	3140	C00438291	10/31/2016	12/28/2016	58	Y

Total Challenges Processed 11

Average Processing Days 50.36

Total Reports Processed within 60 Days 11

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2017 APR 28 AM 10:28

April 28, 2017

MEMORANDUM

SENSITIVE

TO: The Commission

THROUGH: Alec Palmer
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

AGENDA DOCUMENT NO. X17-15

AGENDA ITEM

For meeting of 5-9-17

Lynn Fraser *LF*
Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Thomas Hintermister *TH*
Assistant Staff Director
Audit Division

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2017 – 2nd Quarter Highlights (1/1/17 - 3/31/17) & FY Statistical Overview

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the second quarter (1/1/17 - 3/31/17) and 2017 fiscal year statistical overview. The intent of this document is to proactively provide an update of the workload and achieved results of the Compliance Office on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during the May 9, 2017 Executive Session.

The attached **Appendix A** provides the Commission with second quarter highlights for each office and also a statistical overview of FY 2017 results and progression towards meeting the 2014-2019 Strategic Performance Goals recently adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled 'Proposed Final Audit Report – Due Date' which highlights the report manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2017 statistics for meeting strategic performance goals related to the Administrative Fine Program.

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the overview.

Alternative Dispute Resolution Office (ADRO)

In the second quarter of FY 2017, the ADRO received 3 cases (2 from RAD and 1 from Audit). During this time period, the ADRO closed a total of 7 cases, 5 with approved negotiated settlements and 2 cases with approved recommendations to dismiss. (b) (7)(E)

(b) (7)(E)

The ADRO continued to work with the Office of Chief Information Officer (OCIO) regarding the upgrade of the case management system (Law Manager), which was implemented last July. The ADRO anticipates that work will begin on integrating automated mail merge technology with the system in the 2017 fiscal year. In addition, the ADRO worked with OCIO on upgrades to the SMUR system and enhancements to the ADRO webpages.

The ADRO remained active in providing skill building training in conflict management, in large part by providing Conflict Coaching to FEC staff and lunch time mini-seminars on conflict management. Conflict coaching can assist in decreasing the negative effects of conflict in the workplace. The ADRO staff continues interagency conflict coaching discussions to share lessons learned with those federal agencies setting up conflict coaching programs. The ADRO staff continues to serve on the steering committee of the Federal Interagency ADR Working Group. In addition, both the Director and Assistant Director serve on the roster of Sharing Neutrals, an interagency mediation program which provides trained mediators to participating Federal agencies to resolve workplace disputes as workload considerations allow. Sharing Neutrals provides mediation services to resolve workplace disputes at no cost to the Commission in exchange for the ADRO staff's service.

Administrative Fine Program (Office of Administrative Review)

During the second quarter of FY 2017, the Commission processed 59 Reason to Believe (RTB) findings. OAR received 3 challenges and processed 7 Reviewing Officer Recommendations (RORs). The Commission made a final determination that the respondents in

34 cases violated 2 U.S.C. § 30104(a) and assessed penalties totaling \$94,588. The Commission also collected \$96,452 in fine payments and prepared 9 cases for public release.

As of April 28, 2017 the Commission has approved a total of 3,153 RTB findings and 2,938 final determination recommendations. The AFP has collected \$4.58 million in 2,465 cases, received 736 challenges, and publicly released 2,928 cases. Of the 736 challenges, the Commission upheld 448 of the RTB findings (60%) with no change in the fine, upheld 122 of the RTB findings (16%) with fines changed, and waived 161 fines (21%). As of January 31, the Commission had not yet made a final determination in the 5 remaining cases.

(b) (7)(E)

(b) (7)(E) Additionally, the Office of Administrative Review (OAR) forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

Audit Division

During the second quarter of FY 2017, the Audit Division processed the following audit reports:

	Audit Report Stage	Number of Reports
Released to Public	Final Audit Report	5
Sent to the Committee	Interim Audit Report	1
	Draft Final Audit Report	2
Circulated to the Commission	Interim Audit Report	1
	Audit Division Recommendation Memorandum	3
	Proposed Final Audit Reports	0
Forwarded to OGC	Interim Audit Report	1
	Draft Final Audit Report	2
	Audit Division Recommendation Memorandum	3

Fieldwork is currently on-going for two audits (Michigan Democratic State Central Committee and Massachusetts Democratic State Committee-Fed Funds Account) and the Audit Division has 17 open audits. An audit hearing was granted for one committee, Illinois Republican Party. Pre-audit is on-going for both Title 26 audits (Jill Stein for President and O'Malley for President). Audit will be sending notification letters on the recently approved seven authorized audits next week.

Audit sent three referrals to the Office of General Counsel and one referral was sent to the ADRO.

With respect to the Presidential Election Campaign Fund (PECF), the Audit Division processed the approved payment for the fourth and final submission from the Jill Stein for President Committee. Currently, the Audit Division is updating written procedures pertaining to the PECF administration regarding the long range budget estimates. Likewise, the Audit Division is updating the Commission Directives 23 and 24, as necessary. Finally, the Audit Division continues to post monthly PECF reports to the Commission website.

The Audit Division received new laptops in February. Additionally, the Audit Division staff continues to conduct user acceptance testing on a website protocol that will allow committees to download documents to an agency server, which will allow for greater protection of PII information.

The Audit Division has started a records cleanup project in anticipation of the move. Also Audit Managers are incorporating new timelines for audits to be completed. Multiple staff meetings were held to train and increase morale in the Audit Division.

Reports Analysis Division (RAD)

During the second quarter of FY 2017, RAD staff continued its collaboration with OCIO on the development and testing of the Correspondence Tracking System, which will allow Campaign Finance Analysts to assist committees with questions via email through an approval and tracking system. We are in the final stages of testing and have collaborated with 18F on the system interface for the new website. The system will be accessible to the public through the FEC's new website in May. In addition, during the second quarter RAD worked with Commission Offices to gain approval of the 2017-2018 RAD Review and Referral Procedures.

RAD staff reviewed a total of 27,607 documents totaling 7,570,160 pages during the second quarter of FY 2017 and 78.49% of the reports have been reviewed within 90 days of receipt for the current election cycle (Appendix A, page 12), narrowly exceeding our goal of 75%. The 10% decline in this goal from the last quarter can be attributed to the delay in gaining approval of the 2017-2018 RAD Review & Referral Procedures. RAD generated and sent 4,281 letters to the filing community during the second quarter and for FY 2017, 88% of RFAs were sent within 40 days of the report review date (Appendix A, page 14). Also during the second quarter, RAD generated 14 referrals (4 OGC, 2 ADRO, 1 Debt Settlement, 7 Audit) and sent 4,884 non-filer notices. Finally, during the second quarter, Reports Processing Branch staff coded 6,929,919 transactions from 2,408 documents, and processed 554,365 pages from 6,172 documents in the Paper Automation system.

On the personnel front, during the second quarter, RAD saw the departure of another Campaign Finance Analyst (CFA), bringing the total vacant CFA positions to four (4). Further, a GS-12 CFA was detailed to an Assistant Branch Chief position that was vacated due to a detail in the Staff Director's Office and a CFA has accepted a detail opportunity in the Office of the Commission Secretary beginning in May. These details result in additional CFA staff shortages. In addition, a Secretary position and (2) Coding Clerk positions remain vacant.

Finally, during the second quarter, RAD Managers dedicated a significant amount of time on staff development and education. We held process overview sessions with OAR, the Audit Division, the Information Division, and ADRO to educate RAD staff on the functions of each of these offices. In addition, we held brown bag lunch sessions with three (3) Commissioners where staff was able to hear different perspectives and ask questions. Finally, we held a Professional Development week where staff was able to choose from and focus on different topics and participate in group discussions, coaching sessions, and/or online training classes/tutorials.

Attachments

Appendix A, FY 2017 Highlights and FY Overview for Office of Compliance Goals

Appendix B, Open Audits Report

Appendix C, Proposed Final Audit Report – Due Date

Appendix D, ADRO Civil Penalty Report

Appendix E, AF Performance Goals Report

Office of Compliance - ADRO, OAR, Audit & RAD

Fiscal Year 2017 2nd Quarter Highlights & Statistical Overview (10/1/16 – 3/31/17)

Alternative Dispute Resolution Office

FY 2017 – 2nd Quarter Highlights

- (b) (7)(E)
- Worked with the OCIO on upgrades to SMUR and enhancements to the ADRO webpages.
- Implemented Pay.gov payment system.
- Trained RAD staff on ADR case opening procedures.
- Assistant Director served on Data Act Project Executive Team, Records Scheduling Project Team, and Clean-Up Committee.
- The ADRO continued to provide the Conflict Coaching program to all FEC staff.
- As part of the Interagency ADR Working Group, the Director and the Assistant Director serve as mediators for Sharing Neutrals as a collateral duty. In exchange the Commission receives mediation services for work place disputes at no cost.

Alternative Dispute Resolution Office

(b) (7)(E)

FY	2009	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 - 3/31/17)
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(b) (7)(E)

Internal Processing Days (avg.)	N/A	N/A	N/A	N/A	70.5	124	116	113	131
Percentage to Goal	N/A	N/A	N/A	N/A	100%	95%	100%	100%	100%
Penalties Assessed	\$198,395	\$93,100	\$43,950	\$140,126	\$36,850	\$255,381	\$141,079	\$58,800	\$43,405
Penalties Collected	\$197,495	\$93,100	\$48,700	\$138,126	\$26,600	\$193,281	\$187,383	\$59,445.78	\$36,805

Office of Administrative Review

FY 2017 – 2nd Quarter Highlights

- Processed 7 Reviewing Officer Recommendations in an average of 55 days
- Commission approved 9 OAR Final Determination Recommendations
- \$96,452 in fine payments collected
- Transferred 1 case to Treasury for debt collection
- Continued working with OCFO to modify AF financial reports to accommodate process changes and increase efficiency.

Office of Administrative Review

(b) (7)(E)

FY	2009	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 - 3/31/17)
Challenges Received	67	11	60	11	26	6	35	12	18
Challenges Closed (FD)	67	9	60	10	31	5	32	11	15
Total Processing Days (avg.)	70	38.77	53.15	46.89	29.86	32.5	48.56	58	52.17
Percentage to Goal	60%	100%	100%	100%	93%	100%	97%	81.8%	100%
Fines Assessed (Inclusive of RAD)	\$463,232	\$57,237	\$428,434	\$142,960	\$627,40*	\$139,223	\$290,173	\$133,758	\$165,118
Fines Paid (Inclusive of RAD)	\$388,397	\$90,646	\$344,017	\$101,636	\$540,27*	\$94,171	\$199,948	\$123,838	\$166,060

*Note: Includes \$191,135 civil money penalty for AF# 2512 (Obama for America) as included in Conciliation Agreement for MURs 6078, 6090, 6108, 6139, 6142 and 6214, and AF# 2512. Includes \$20,000 civil money penalty for AF# 2638 (McCain-Palin Compliance Fund Inc.) as included in Conciliation Agreement for MUR 6112.



Challenge Review Queue

(Confidential and Sensitive)

AF #	ID	Name	Committee	Report		Reason To Believe		Challenge		Reviewed By Date
				Year	Type	Date	Fine	Rcpt Date	Basis	
3234	C00484683	STUTZMAN FOR SENATE		2016	48H	02/21/2017	\$4,588	03/27/2017	LOA	05/26/2017
3269	C00603563	LIBERTY ACTION GROUP		2016	30G	03/29/2017	\$9,290	04/12/2017	FECFile/E FO Support/US A	06/11/2017

2 Total Cases to Be Reviewed

Audit Division

FY 2017 – 2nd Quarter Highlights

- 2 Audits are currently in the fieldwork stage
- Two Title 26 audits will begin fieldwork in May
- Audit referrals for seven Authorized committees were approved
- Authorized Audit Program circulated for approval
- Audit received new laptops and upgraded to TeamMate version 11.1
- Collaborated with OGC to generate a Directive 69 Legal Guidance Report for the Commission
- Audit staff attended FEC webinars and internal training sessions
- Held monthly staff meetings highlighting FECA and Audit principles.
- Audit is updating written procedures pertaining to the PECF administration (long range budget estimates) and updating appropriate Directives as necessary. Audit continues to post the monthly PECF reports on the website
- Vetted Press Releases about audit reports and matching fund submission for the Press Office
- Audit staff participated on the Lease Renewal Advisory Team and associated committees for the FEC move
- All Audit Managers received timely 2016-2017 Mid-Year Performance Assessments

(b) (7)(E)

Reports Analysis Division

FY 2017 – 2nd Quarter Highlights

- **(b) (7)(E)**
- Reviewed **27,607** documents totaling **7,570,160** pages
- Sent out **4,281** letters and handled **2,749** calls
- Generated **14** referrals (4 OGC, 2 ADRO, 1 Debt Settlement, 7 Audit)
- Coded **6,929,919** transactions from **2,408** documents
- RAD staff conducted workshops for four Reporting Webinars and two FECfile Webinars, as well as an offsite Best Practices session for an organization
- RAD staff Analysts provided extended phone coverage for the 2016 Year End filing deadline
- RAD managers handled OGC inquiries for 41 matters by providing comments on FGCR's and/or answering questions, assisted ADRO with 14 matters, handled 27 inquiries from Commission Offices, 6 inquiries from Audit and 8 inquiries from the Press Office
- RAD staff collaborated with OCIO on the development and testing of the Correspondence Tracking Project and presented a demo of the system for Commission Offices
- RAD staff participated on the Lease Renewal Advisory Team and associated committees for the FEC move
- Met with Commission offices to discuss the Proposed 2017-2018 RAD Review & Referral Procedures
- Held a division meeting highlighting FEC and RAD news, a question/answer segment and a team building activity
- All RAD Managers received timely 2016-2017 Mid-Year Performance Assessments

Reports Analysis Division

Strategic Plan Performance Measurement: 95% of Reports Coded and Entered within 30 Days of Receipt

Fiscal Year	2015	2016	2017 (10/1/16 – 3/31/17)
Number of Documents Coded	56,327	53,107	6,626
Number of Transactions Coded	23,957,421	19,385,479	14,206,189
% of Paper Filed Reports Made Available to the Public within 2 Business Days of Receipt	91.4%	99.1%	98.7%
% of Reports Coded and Entered within 30 Days of Receipt	91.5%	99.9%	93.6%

Reports Analysis Division

Fiscal Year Summary for Paper Automation System

Fiscal Year	2017 (10/1/16 - 9/30/17)
Documents Processed	6,172
Total Pages Processed	554,365
Total Repairs Made	5,399

Reports Analysis Division

Strategic Plan Performance Measurement: 75% of Reports reviewed within 90 days of receipt

Election Cycle	2008	2010	2012	2014	2016 (Election Cycle to Date)
Documents Reviewed	146,220	142,231	144,943	180,975	156,220
Average Review Days Required per Report	52.80	51.53	55.31	43.31	34.20
Total Page Count of Documents Reviewed	14,112,885	8,792,843	15,634,938	23,798,740	43,125,812
% of Reports Reviewed within 90 Days	81.75%	82.72%	80.77%	77.18%	89.27%

*78.49% of Reports Reviewed within 90 Days of receipt for second quarter of FY 2017 (10/1/2016-3/31/2017)

Reports Analysis Division

Fiscal Year Overview of Key RAD Deliverables

Fiscal Year	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 – 3/31/17)
Tracked Letters Sent	8,889	10,247	8,346	13,205	8,569	11,483	11,183	8,105
Untracked Letters Sent	1,429	1,868	1,853	2,338	1,651	1,950	2,070	1,709
Referrals	31	89	99	88	59	91	43	24
Admin Fines RTB/FD	75/38	309/272	69/36	194/184	70/55	191/159	83/33	143/50
Telephone Calls Handled	13,923	14,502	16,265	14,254	10,673	11,822	12,362	6,715

Reports Analysis Division

**Strategic Plan Performance Measurement: 75% of RFAI's sent within
40 days of Report Review**

Fiscal Year	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 – 3/31/17)
Number of RFAIs Sent	6,509	5,992	5,310	6,322	4,469	4,694	5,206	2,966
% of RFAIs Sent within 40 Days of Report Review	87%	76%	63%	72%	84%	92%	92%	88%

Reports Analysis Division

(b) (7)(E)

FY	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 – 3/31/17)
Total AF Reports Generated	63	45	98	56	95	46	66	26
Average Processing Days	46.7	52.1	40.5	56.9	55.3	58.7	54.5	55.2
(b) (7)(E)	63	45	98	51	92	43	66	24
Percentage to Goal	100%	100%	100%	91.07%	96.84%	93.48%	100%	92.31%



Open Audits

As of 4/28/2017

(Confidential and Sensitive)

		<u>Date of</u>		<u>Audit</u>	<u>Report</u>
		<u>Last Action</u>		<u>Manager</u>	<u>Track</u>
Pre-Audit					
2016	JILL STEIN FOR PRESIDENT	C00581199	11/30/2016	Burgess	B
2016	O'MALLEY FOR PRESIDENT	C00578658	11/30/2016	Pacious	B
		Total - 2			
Fieldwork					
2014	MASSACHUSETTS DEMOCRATIC STATE CMTE - FED FUNDS ACCT	C00089243	06/08/2016	Smith	B
2014	MICHIGAN DEMOCRATIC STATE CENTRAL COMMITTEE	C00031054	08/22/2016	Kodish	B
		Total - 2			
Interim/Preliminary Report Writing					
2014	PERDUE FOR SENATE	C00547570	12/02/2016	Smith	B
2014	ARIZONA REPUBLICAN PARTY	C00008227	02/22/2017	Favin	B
2014	DEMOCRATIC PARTY OF SOUTH CAROLINA	C00007658	03/14/2017	Burgess	B
2014	DEMOCRATIC PARTY OF ARKANSAS	C00024372	03/16/2017	Morcomb	B
		Total - 4			
Draft Final Audit Report Writing					
2012	DEMOCRATIC PARTY OF HAWAII	C00212787	12/12/2016	Kodish	B
2012	NEW YORK REPUBLICAN FEDERAL CAMPAIGN COMMITTEE	C00055582	04/12/2017	Burgess	B
		Total - 2			
Draft Final Audit Report Committee Response Period					
2014	AMERICAN FINANCIAL SERVICES ASSOCIATION PAC	C00038604	04/21/2017	Kodish	B
		Total - 1			
Audit Division Recommendation Memorandum Writing					
2012	COLORADO REPUBLICAN COMMITTEE	C00033134	02/07/2017	Pacious	B
2012	ILLINOIS REPUBLICAN PARTY	C00005926	04/17/2017	Favin	B
		Total - 2			
Audits in OGC					
2014	MCSALLY FOR CONGRESS	C00512236	IAR 03/21/2017	Pacious	B
2012	FREEDOM'S DEFENSE FUND	C00401786	DFAR 03/24/2017	Favin	B
2012	CONSERVATIVE MAJORITY FUND	C00524454	DFAR 03/29/2017	Morcomb	B
		Total - 3			
Audits with the Commission					
2012	TED CRUZ FOR SENATE	C00492785	ADRM 04/25/2017	Kodish	B
		Total - 1			



Open Audits

As of 4/28/2017
(Confidential and Sensitive)

17 Open Audits

Legend

Track A	Audits with <u>no</u> unresolved legal issues
Track B	State/Local Party audits with findings PAC audits with unresolved legal issues Authorized audits with unresolved legal issues
Track C	Audits with <u>no</u> findings
IAR	Interim Audit Report
PAR	Preliminary Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report
Text	If text is red, the report has not been sent to OGC for a legal analysis



Open Audits

As of 4/28/2017
(Confidential and Sensitive)

Audit Caseload

<u>Audit Manager</u>	<u>Number of Audits</u>	<u>Percent of Total Audits ¹</u>
Burgess	3	18%
Favin	3	18%
Kodish	4	24%
Morcomb	2	12%
Pacious	3	18%
Smith	2	12%
Totals	17	100%

¹ May not total 100% due to rounding



Open Audits

As of 4/28/2017

(Confidential and Sensitive)

Comments

2012

Colorado Republican Committee

(b) (5)

Conservative Majority Fund

(b) (5)

Freedom's Defense Fund

(b) (5)

Hawaii Democratic Party

(b) (5)

Illinois Republican Party

(b) (5)

New York Republican Federal Campaign Committee

(b) (5)

Ted Cruz for Senate

(b) (5)

2014

American Financial Services Association PAC

(b) (5)

Arizona Republican Party

(b) (5)

Democratic Party of Arkansas

(b) (5)

Democratic Party of South Carolina

(b) (5)

Massachusetts Democratic State Committee

(b) (5)

McSally for Congress

(b) (5)

Michigan Democratic State Central Committee

(b) (5)

Perdue for Senate

(b) (5)

2016

Jill Stein for President

(b) (5)



Open Audits
As of 4/28/2017
(Confidential and Sensitive)

O'Malley for President
(b) (5)



Proposed Final Audit Report - Due Date

As of 4/28/2017

(Confidential and Sensitive)

	<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2012 TED CRUZ FOR SENATE	Kodish	ADRM	Circulated to Commission	04/30/2013
2012 DEMOCRATIC PARTY OF HAWAII	Kodish	DFAR	Report Writing	10/21/2013
2012 COLORADO REPUBLICAN COMMITTEE	Pacious	ADRM	Memorandum Writing	10/21/2013
2012 NEW YORK REPUBLICAN FEDERAL CAMPAIGN COMMITTEE	Burgess	DFAR	Report Writing	10/21/2013
2012 FREEDOM'S DEFENSE FUND	Favin	DFAR	OGC Reviewing	02/03/2014
2012 CONSERVATIVE MAJORITY FUND	Lmorcomb	DFAR	OGC Reviewing	02/05/2014
2012 ILLINOIS REPUBLICAN PARTY	Favin	ADRM	Memorandum Writing	10/21/2013
2014 PERDUE FOR SENATE	Smith	IAR	Report Writing	04/24/2015
2014 MCSALLY FOR CONGRESS	Pacious	IAR	OGC Reviewing	04/24/2015
2014 AMERICAN FINANCIAL SERVICES ASSOCIATION PAC	Kodish	DFAR	Committee Response Period	11/18/2015
2014 DEMOCRATIC PARTY OF SOUTH CAROLINA	Burgess	IAR	Report Writing	11/18/2015
2014 DEMOCRATIC PARTY OF ARKANSAS	Lmorcomb	IAR	Report Writing	11/18/2015
2014 ARIZONA REPUBLICAN PARTY	Favin	IAR	Report Writing	11/18/2015
2014 MICHIGAN DEMOCRATIC STATE CENTRAL COMMITTEE	Kodish		Fieldwork	11/18/2015
2014 MASSACHUSETTS DEMOCRATIC STATE CMTE - FED FUNDS ACCT	Smith		Fieldwork	11/18/2015
2016 O'MALLEY FOR PRESIDENT	Pacious		Pre-Audit	11/30/2016
2016 JILL STEIN FOR PRESIDENT	Burgess		Pre-Audit	11/30/2016

(b) (7)(E)



Proposed Final Audit Report - Due Date

As of 4/28/2017

(Confidential and Sensitive)

17 Open Audits

Legend

IAR	Interim Audit Report
PAR	Preliminary Audit Report
DFAR	Draft Final Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year: 10/01/2015 To: 09/30/2017

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY -2016	757	Friends of Clyde Holloway for Congress Guillot, Felix	\$0.00	10/19/2015	\$0.00	10/19/2015	\$0.00	Attend FEC seminar	10/19/2016	01/20/2016
	759	All Citizens for Mississippi Vann, Jacqueline	\$2,000.00	10/27/2016	\$2,000.00	03/27/2017	\$0.00	Attend FEC seminar	10/27/2016	03/27/2017
	760	Dewhurst for Texas	\$0.00	03/02/2017		03/02/2017		Committee will file for termination	03/02/2017	01/06/2017
	764	Dewhurst for Texas	\$0.00	03/02/2017		03/02/2017		Committee will file for termination	03/02/2017	01/06/2017
	765	Texans for a Conservative Majority Cubriel, Randy	\$6,150.00	11/21/2015	\$6,150.00	11/02/2015	\$0.00	Conduct & certify internal audit/reconciliation Conduct internal education program for employees or staff	11/21/2016 11/21/2015	10/24/2016 12/15/2015
	767	Joe Carr for Senate Schott, Nate	\$2,250.00	12/18/2015	\$2,250.00	12/17/2015	\$0.00	Committee will file for termination	01/17/2016	08/16/2016
	769	Adkins, Mary Rose National Rifle Association (NRA) of America Political Victory Fund Adkins, Mary Rose National Rifle Association (NRA) of America Political Victory Fund	\$2,750.00	12/02/2015	\$2,750.00	11/19/2015	\$0.00	Conduct & certify internal audit/reconciliation	11/02/2016 11/02/2017	11/14/2016
	772	Lisker, Lisa	\$0.00	08/01/2016				Committee will file for termination	08/01/2016	08/01/2016

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
		Newt 2012						Committee will file for termination	08/01/2016	08/01/2016
	775	May, Jennifer Marjorie 2014	\$0.00	05/24/2016				Committee will file for termination		
	777	Massachusetts Republican Party Anderson, Brent	\$4,500.00	02/07/2016	\$4,500.00	02/05/2016	\$0.00	Conduct & certify internal audit/reconciliation	02/08/2017	06/03/2016
	778	Ohio State Central & Executive Committee (Republican) Armstrong, Maria	\$3,000.00	01/18/2016	\$3,000.00	01/15/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	12/18/2016 03/18/2016	11/14/2016 02/17/2016
	781	Sharon Sund for Congress Roberson, Eugene	\$0.00	05/24/2016				File amended reports Participate in conference call on requirements of FECA	03/28/2016 03/10/2016	06/30/2016 06/30/2016
	782	VANILA SINGH FOR CONGRESS 2014	\$2,300.00	04/19/2016	\$2,300.00	04/08/2016	\$0.00	Committee will file for termination	07/19/2016	03/07/2016
	784	McConnell Senate Committee '14 McConnell Senate Committee '14	\$0.00	05/24/2016				Other	04/25/2016	04/29/2016
	785	Lisker, Lisa House Conservatives Fund	\$0.00	05/24/2016				Develop and enforce internal controls File amended reports	04/21/2016 03/21/2017	03/22/2016
	786	David Vitter for U.S. Senate David Vitter for U.S. Senate David Vitter for U.S. Senate	\$0.00	05/24/2016				Other	03/23/2017 04/25/2016	03/01/2017 04/01/2016
	787	Mackenzie, Scott B. Conservative Majority Fund	\$3,500.00	08/11/2016	\$3,500.00	07/26/2016	\$0.00	Attend FEC seminar File amended reports	07/12/2017 08/11/2016	

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	788	Conservative Campaign Committee	\$4,750.00	10/19/2016	\$4,750.00	11/21/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	04/09/2017 07/19/2016	09/07/2016
	789	Democratic Party Of Hawaii Kong Kee, Florence L	\$6,375.00	10/26/2016	\$6,375.00	11/08/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	04/26/2017 07/26/2017	
	792	Oakland County Democratic Party	\$10,000.00	11/18/2016	\$10,000.00	09/19/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	05/19/2017 08/19/2016	09/01/2016
	793	Ohio Democratic Party Alberty, Fran	\$3,850.00	07/02/2016	\$3,850.00	07/01/2016	\$0.00	Attend FEC seminar	06/02/2017	
	798	Cotton for Senate	\$2,000.00	09/10/2016	\$2,000.00	08/24/2016	\$0.00	Develop a FEC Compliance Manual	11/10/2016	11/08/2016
	799	Utah State Democrat Committee-Federal Corroon, Peter Utah State Democrat Committee-Federal Corroon, Peter	\$1,550.00	10/10/2016	\$1,550.00	08/24/2016	\$0.00	Other	08/10/2016	08/10/2016
	802	Right to Rise PAC, Inc	\$2,400.00	10/07/2016	\$2,400.00	07/08/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	09/08/2017 12/08/2016	06/22/2016 07/08/2016
	807	Voelter, Dalhan Keep the Promise PAC	\$1,425.00	10/22/2016	\$1,425.00	11/01/2016	\$0.00	Committee will file for termination	12/21/2016	02/03/2017
Sub-Total : FY -2016			\$58,800.00		\$58,800.00		\$0.00			
FY -2017	791	Oklahoma Leadership Council Hodges, Peter Leo	\$8,750.00	10/12/2017				Attend FEC seminar	04/12/2018	
	796	Lowey, Keith D Duckworth for Congress	\$2,280.00	02/19/2017	\$2,280.00	01/06/2017	\$0.00	Committee will file for termination	04/19/2017	01/31/2017

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	800	The 2016 Draft Committee (f/k/a National Draft Ben Carson for President Committee)	\$11,000.00	12/14/2016	\$11,000.00	11/01/2016	\$0.00	Committee will file for termination	04/14/2017	01/12/2017
	803	Majority Committee PAC—MC PAC Thomson, Jill	\$1,575.00	12/14/2016	\$1,575.00	11/23/2016	\$0.00	Attend FEC seminar	11/14/2017	
								Other	12/14/2016	01/25/2017
	804	Americans for a Conservative Direction	\$2,550.00	04/17/2017				None		
	805	Reift, Neil P., Esq VoteVets.org Action Fund	\$2,000.00	01/04/2017	\$2,000.00	12/28/2016	\$0.00	Attend FEC seminar	12/07/2017	
								Develop a FEC Compliance Manual	03/05/2017	
	806	Marston, Chris Rodney for Congress	\$3,400.00	11/24/2016	\$3,400.00	03/01/2017	\$0.00	Attend FEC seminar	10/24/2017	09/28/2016
								Develop a FEC Compliance Manual	02/24/2017	02/22/2017
	808	Southwest Regional Council of Carpenters Legislative Improvement Cmte United Brotherhood of Carpenters & Joiners of America (SW CLIC) Thornhill, Randy	\$2,500.00	03/07/2017	\$2,500.00	03/07/2017	\$0.00	Attend FEC seminar	02/07/2018	
								Develop a FEC Compliance Manual	05/08/2017	
	810	Independence USA PAC Gubelli, Diane	\$3,300.00	05/05/2017	\$3,300.00	04/24/2017	\$0.00	Attend FEC seminar	04/05/2018	
								Other	06/05/2017	
	812	Foundation for a Greater America, Inc. Ault, Anastasia	\$3,750.00	05/19/2017				Committee will file for termination	07/19/2017	
	813	Scott Rigell for Congress	\$5,600.00	04/22/2017	\$5,600.00	04/18/2017	\$0.00	Committee will file for termination	05/22/2017	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		Wood, Joseph B.						Committee will file for termination Other	05/22/2017 04/22/2017	
Sub-Total : FY -2017			\$46,705.00		\$31,655.00		\$0.00			
Grand Total :			\$105,505.00		\$90,455.00		\$0.00			



AF Performance Goals

Print Date: April 28, 2017

Selected Parameters:

Office: Both

Start Date: 10/01/2016

End Date: 03/31/2017

*Exception: YES



AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
Processed						
2016	YE	H_S_P_UNAUTH	N	01/31/2017	03/30/2017	
2016	30G	UNAUTH	N	12/08/2016	03/28/2017	
2016	30G	AUTH	N	12/08/2016	01/23/2017	
2016	12G	UNAUTH_Q	Y	10/27/2016	03/20/2017	
2016	12G	AUTH	Y	10/27/2016	12/12/2016	
2016	12G	UNAUTH_M	Y	10/27/2016	12/12/2016	
2016	Q3	H_S_P_UNAUTH	N	10/15/2016	12/06/2016	
2016	Q3	H_S_P_UNAUTH	Y	10/15/2016	12/06/2016	
2016	M9	P_UNAUTH	N	09/20/2016	11/15/2016	
2016	M8	P_UNAUTH	N	08/20/2016	10/17/2016	

Total AF Reports Processed 10

Average Processing Days 66.80

(b) (7)(E)

Percentage to Goal 80.00%

Processed - No committees

					Action Date	(b) (7)(E)
2016	30GR	AUTH	N	01/09/2017	03/09/2017	
2016	30GR	AUTH	N	12/22/2016	01/24/2017	
2016	M12	P_UNAUTH	N	12/20/2016	01/24/2017	
2016	30SG	AUTH	N	12/08/2016	01/17/2017	
2016	12GR	AUTH	Y	11/28/2016	01/17/2017	
2016	M11	P_UNAUTH	N	11/20/2016	01/17/2017	
2016	12GR	AUTH	Y	11/10/2016	12/12/2016	
2016	12SG	AUTH	Y	10/27/2016	12/07/2016	
2016	M10	P_UNAUTH	N	10/20/2016	12/07/2016	
2016	M10	P_UNAUTH	Y	10/20/2016	12/07/2016	
2016	12P	AUTH	Y	09/01/2016	10/27/2016	
2016	12SP	AUTH	Y	09/01/2016	10/27/2016	
2016	12P	AUTH	Y	08/27/2016	10/20/2016	



AF Performance Goals

(Confidential and Sensitive)

Processed - No committees

					Action Date
2016	12P	AUTH	Y	08/18/2016	10/17/2016
2016	12P	AUTH	Y	08/15/2016	10/03/2016
2016	12PR	AUTH	Y	08/15/2016	10/03/2016

(b) (7)(E)

Total AF Reports Processed-No Committees	16
Average Processing Days	48.00
(b) (7)(E)	
Percentage to Goal	100.00%

Total AF Reports	26
Average Processing Days	55.23
(b) (7)(E)	
Percentage to Goal	92.31%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters

RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2016	Q1	3067	C00432096	09/06/2016	11/02/2016	57	Y
2016	12P	3086	C00559492	09/08/2016	11/03/2016	56	Y
2016	48H	3089	C00592659	10/04/2016	11/16/2016	43	Y
2016	Q2	3118	C00588756	10/24/2016	11/16/2016	23	Y
2016	Q2	3124	C00612929	10/25/2016	12/13/2016	49	Y
2016	Q2	3125	C00607564	10/24/2016	12/15/2016	52	Y
2016	Q2	3128	C00586578	10/25/2016	12/15/2016	51	Y
2016	Q2	3130	C00606897	10/25/2016	12/15/2016	51	Y
2016	Q2	3131	C00565598	10/25/2016	12/20/2016	56	Y
2016	Q2	3138	C00520064	10/31/2016	12/28/2016	58	Y
2016	M7	3140	C00438291	10/31/2016	12/28/2016	58	Y
2016	M8	3144	C00496505	11/17/2016	01/12/2017	56	Y
2016	M8	3146	C00544767	11/17/2016	01/12/2017	56	Y
2016	48H	3148	C00266940	11/16/2016	01/11/2017	56	Y
2016	M9	3149	C00496505	11/23/2016	01/12/2017	50	Y
2016	M9	3151	C00544767	11/23/2016	01/12/2017	50	Y
2016	Q3	3163	C00610113	12/27/2016	02/23/2017	58	Y
2016	Q3	3169	C00593103	01/23/2017	03/23/2017	59	Y



AF Performance Goals

(Confidential and Sensitive)

Total Challenges Processed	18
Average Processing Days	52.17
Total Reports Processed within 60 Days	18
Percentage to Goal	100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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2017 JUL 31 PM 3:37

July 31, 2017

SENSITIVE

MEMORANDUM

AGENDA DOCUMENT NO. X17-23

AGENDA ITEM

For meeting of August 15, 2017

TO: The Commission

THROUGH: Alec Palmer *AWH for*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista Roche *KR*
Acting Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Thomas Hintermister *TH*
Assistant Staff Director
Audit Division

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2017 – 3rd Quarter Highlights (4/1/17 - 6/30/17) & FY Statistical Overview

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the third quarter (4/1/17 - 6/30/17) and 2017 fiscal year statistical overview. The intent of this document is to proactively provide an update of the workload and achieved results of the Compliance Office on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during an upcoming Executive Session. Please note, we have also added additional slides to address the issue of timeliness within the Audit Division.

The attached **Appendix A** provides the Commission with third quarter highlights for each office and also a statistical overview of FY 2017 results and progression towards meeting the 2014-2019 Strategic Performance Goals adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled 'Proposed Final Audit Report – Due Date' which highlights the report manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2017 statistics for meeting strategic performance goals related to the Administrative Fine Program.

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the overview.

Alternative Dispute Resolution Office (ADRO)

In the third quarter of FY 2017, the ADRO received 10 cases (6 from RAD, 3 from OGC, and 1 directly from the Commission). During this time period, the ADRO closed a total of 4 cases, 3 with approved negotiated settlements and 1 case with an approved recommendations to dismiss. (b) (7)(E)

The ADRO continued to work with the Office of Chief Information Officer (OCIO) regarding the upgrade of the case management system (Law Manager), which was implemented last July. The ADRO anticipates that work will begin on integrating automated mail merge technology with the system in the 2017 fiscal year. In addition, the ADRO worked with OCIO on upgrades to the SMUR system to enhance the accuracy and efficiency of publishing ADR matters to the Enforcement Query System.

The ADRO remained active in providing skill building training in conflict management, in large part by providing Conflict Coaching to FEC staff and lunch time mini-seminars on conflict management. Conflict coaching can assist in decreasing the negative effects of conflict in the workplace. The ADRO staff continues interagency conflict coaching discussions to share lessons learned with those federal agencies setting up conflict coaching programs. The ADRO staff continues to serve on the steering committee of the Federal Interagency ADR Working Group. In addition, ADR staff serve on the roster of Sharing Neutrals, an interagency mediation program which provides trained mediators to participating Federal agencies to resolve workplace disputes as workload considerations allow. Sharing Neutrals provides mediation services to resolve workplace disputes at no cost to the Commission in exchange for the ADRO staff's service.

Administrative Fine Program (Office of Administrative Review)

During the third quarter of FY 2017, the Commission processed 46 Reason to Believe (RTB) findings. OAR received 8 challenges and processed 7 Reviewing Officer Recommendations (RORs). The Commission reviewed final determination recommendations in 60 cases, and made a final determination that the respondents in 54 cases violated 2 U.S.C. § 30104(a) and assessed penalties totaling \$106,251. The Commission also collected \$131,629 in fine payments and prepared 52 cases for public release.

As of July 31, 2017 the Commission has approved a total of 3,164 RTB findings and 3,052 final determination recommendations. The AFP has collected \$4.71 million in 2,507 cases, received 736 challenges, and publicly released 3,068 cases. Of the 744 challenges, the Commission upheld 449 of the RTB findings (60%) with no change in the fine, upheld 124 of the RTB findings (16%) with fines changed, and waived 163 fines (21%). As of July 31, the Commission had not yet made a final determination in the 8 remaining cases.

(b) (7)(E)

(b) (7)(E) Additionally, the Office of Administrative Review (OAR) forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

Audit Division

During the third quarter of FY 2017, the Audit Division processed the following audit reports:

	Audit Report Stage	Number of Reports
Released to Public	Final Audit Report	1
Sent to the Committee	Interim Audit Report	1
	Draft Final Audit Report	3
Circulated to the Commission	Interim Audit Report	1
	Audit Division Recommendation Memorandum	3
	Proposed Final Audit Reports	1
Forwarded to OGC	Interim Audit Report	0
	Draft Final Audit Report	3
	Audit Division Recommendation Memorandum	3

Fieldwork is currently on-going for two audits (O'Malley for President and Kelly for Congress) and the Audit Division has 21 open audits. An audit hearing was held for one committee, Illinois Republican Party and granted for two other committees, Freedom's Defense

Fund and Conservative Majority Fund. Pre-audit is on-going for one Title 26 audit (Jill Stein for President) and six of the recently approved Title 52 audits of authorized committees. (b) (7)(E)

With respect to the Presidential Election Campaign Fund (PECF), the Audit Division updated written procedures pertaining to the PECF administration regarding the long range budget estimates. Likewise, the Audit Division updated the Commission Directives 23 and 24 and circulated the proposed edits to the Office of General Counsel (OGC). (b) (5)

This document is currently pending before the Commission. Finally, the Audit Division continues to post monthly PECF reports to the Commission website.

On the personnel front, the Audit Division is down six Auditors. We did receive approval to post for an auditor. If qualified candidates are identified, we will submit a request to the Personnel Committee for approval to hire.

Reports Analysis Division (RAD)

During the third quarter of FY 2017, RAD staff completed testing of the Correspondence Tracking System, a system which will allow Campaign Finance Analysts to assist committees with questions via email through an approval and tracking system. The interface for the new website has been completed and we plan to roll out the system through the website in August. In addition, RAD staff collaborated with OCIO on the testing and release of an upgraded FECfile version. RAD staff also collaborated with OGC and the Information Division on revisions to FEC Forms 8 and 9, and participated in a Scam PAC working group with staff from Commission offices, OGC, OCIO, Information Division and Congressional Affairs.

RAD staff reviewed a total of 17,739 documents totaling 13,020,190 pages during the third quarter of FY 2017 and 85.68% of the reports have been reviewed within 90 days of receipt for the current election cycle (Appendix A, page 12). RAD generated and sent 2,065 letters to the filing community during the third quarter and for FY 2017, 93.9% of RFAs were sent within 40 days of the report review date (Appendix A, page 14). Also during the third quarter, RAD generated 15 referrals (6 OGC, 6 ADRO, 3 Admin. Fine) and sent 218 non-filer notices. Finally, during the third quarter, Reports Processing Branch staff coded 3,742,169 transactions and 1,560 documents and for FY17, processed 647,728 pages from 7,620 documents in the Paper Automation system.

On the personnel front, during the third quarter RAD saw the departure of three Campaign Finance Analysts (CFA), bringing the total vacant CFA positions at this time to four (4). Further, a GS-12 CFA remains detailed to an Assistant Branch Chief position that was vacated due to a detail in the Staff Director's Office and a CFA is also serving a detail in the Office of the Commission Secretary. These details result in additional CFA staff shortages. In addition, a Coding Clerk position remains vacant. We are in the process of filling a previously

approved Secretary position, and a new Coding Clerk began at the end of July and three CFAs to come onboard in early August.

Finally, during the third quarter RAD continued to implement events and ideas in response to the Morale Study. We held a process overview session with OGC to educate RAD staff on its functions. In addition, we held brown bag lunch sessions with two (2) Commissioners and one with the Office of Congressional Affairs where staff was able to hear different perspectives and ask questions. We also have several training opportunities and events planned for RAD staff during the fourth quarter.

Attachments

Appendix A, FY 2017 Highlights and FY Overview for Office of Compliance Goals

Appendix B, Open Audits Report

Appendix C, Proposed Final Audit Report – Due Date

Appendix D, ADRO Civil Penalty Report

Appendix E, AF Performance Goals Report

Office of Compliance - ADRO, OAR, Audit & RAD

Fiscal Year 2017 3rd Quarter Highlights & Statistical Overview (10/1/16 – 6/30/17)

Alternative Dispute Resolution Office

FY 2017 – 3rd Quarter Highlights

- (b) (7)(E)
- **Worked with the OCIO on upgrades to SMUR to enhance the accuracy and efficiency of publishing matters to the Enforcement Query System.**
- **Assistant Director served on Data Act Project Executive Team, Records Scheduling Project Team, and Clean-Up Committee.**
- **The ADRO continued to provide the Conflict Coaching program to all FEC staff.**
- **As part of the Interagency ADR Working Group, the Director and the Assistant Director serve as mediators for Sharing Neutrals as a collateral duty. In exchange the Commission receives mediation services for work place disputes at no cost.**

Alternative Dispute Resolution Office

(b) (7)(E)

FY	2009	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 – 6/30/17)
(b) (7)(E)									
Internal Processing Days (avg.)	N/A	N/A	N/A	N/A	70.5	124	116	113	128
Percentage to Goal	N/A	N/A	N/A	N/A	100%	95%	100%	100%	100%
Penalties Assessed	\$198,395	\$93,100	\$43,950	\$140,126	\$36,850	\$255,381	\$141,079	\$58,800	\$58,205
Penalties Collected	\$197,495	\$93,100	\$48,700	\$138,126	\$26,600	\$193,281	\$187,383	\$59,445.78	\$59,755

Office of Administrative Review

FY 2017 – 3rd Quarter Highlights

- **Processed 7 Reviewing Officer Recommendations in an average of 38.43 days**
- **Commission closed 9 OAR Final Determination Recommendations**
- **\$131,629 in fine payments collected**
- **Transferred 5 cases to Treasury for debt collection**
- **Continued working with OCFO and OCIO to modify AF financial reports to accommodate process changes and increase efficiency. RO is currently performing extensive testing to ensure reports will be ready for use beginning FY18.**

Office of Administrative Review

(b) (7)(E)

FY	2009	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 – 6/30/17)
Challenges Received	67	11	60	11	26	6	35	12	26
Challenges Closed (FD)	67	9	60	10	31	5	32	11	24
Total Processing Days (avg.)	70	38.77	53.15	46.89	29.86	32.5	48.56	58	48.32
Percentage to Goal	60%	100%	100%	100%	93%	100%	97%	81.8%	100%
Fines Assessed (Inclusive of RAD)	\$463,232	\$57,237	\$428,434	\$142,960	\$627,40*	\$139,223	\$290,173	\$133,758	\$271,369
Fines Paid (Inclusive of RAD)	\$388,397	\$90,646	\$344,017	\$101,636	\$540,27*	\$94,171	\$199,948	\$123,838	\$226,143

*Note: Includes \$191,135 civil money penalty for AF# 2512 (Obama for America) as included in Conciliation Agreement for MURs 6078, 6090, 6108, 6139, 6142 and 6214, and AF# 2512. Includes \$20,000 civil money penalty for AF# 2638 (McCain-Palin Compliance Fund Inc.) as included in Conciliation Agreement for MUR 6112.



OAR Challenge Queue

(Confidential and Sensitive)

AF #	Committee		Report		Reason To Believe		Challenge		Reviewed By Date	ROR Circ Date	Days to Review
	ID	Name	Year	Type	Date	Fine	Rcpt Date	Basis			
3234	C00484683	STUTZMAN FOR SENATE	2016	48H	02/21/2017	\$4,588	03/27/2017	CE	05/26/2017	07/06/2017	101
3269	C00603563	LIBERTY ACTION GROUP	2016	30G	03/29/2017	\$9,290	04/12/2017	FECFile/E FO Support/S A	06/11/2017	06/09/2017	58
3304	C00603563	LIBERTY ACTION GROUP	2016	YE	04/03/2017	\$6,735	05/01/2017	FECFile/E FO Support/S A	06/30/2017	06/09/2017	39
3302	C00622555	JOHN CARROLL FOR US SENATE 2016	2016	YE	04/03/2017	\$1,176	05/08/2017	LOA	07/07/2017	05/26/2017	18
3298	C00610808	FRIENDS OF PAM TUCKER	2016	YE	04/03/2017	\$3,751	05/15/2017	LOA	07/14/2017	05/31/2017	16
3319	C00608737	COMMITTEE TO ELECT MARK A. HUNT FOR CONGRESS 2016	2016	48H	04/20/2017	\$7,048	05/31/2017	LOA/Not Required to File	07/30/2017	07/28/2017	58
3324	C00578344	LORETTA SANCHEZ FOR SENATE	2016	48H	04/28/2017	\$4,043	06/05/2017	LOA	08/04/2017		
3325	C00459255	FRIENDS OF TODD YOUNG, INC.	2016	48H	04/28/2017	\$3,833	07/07/2017	Contractor/ Vender Error	09/05/2017		

8 Total Cases to Be Reviewed

Average Review TAT 48

Audit Division

FY 2017 – 3rd Quarter Highlights

- **2012 Audits – 5 Remaining of Original 33 Audits – 2 Audits Hearings Granted – (b) (5)**
- **One Title 52 audit (2016 Election Cycle) is in the fieldwork stage**
- **One Title 26 audit is in the fieldwork and one will begin fieldwork in August (2016 Election Cycle)**
- **Partnered with OGC to provide training on obtaining documentation from Committees. The Audit Division will be following the Commission approved program guidelines concerning deadlines. The Audit Report will move forward and any additional documents received after a deadline will be incorporated at the next audit stage.**
- **Audit Division creating templates to allow for the quicker review of workpapers**
- **Collaborated with OGC to generate a Directive 69 Legal Guidance Report for the Commission**
- **Audit staff attended FEC webinars and internal training sessions**
- **Held monthly staff meetings highlighting FECA and Audit principles.**
- **Audit is updating written procedures pertaining to the PECF administration (long range budget estimates) and updating appropriate Directives as necessary. Audit continues to posts the monthly PECF reports on the website**
- **Vetted Press Releases about audit reports for the Press Office**
- **Audit staff participated on the Lease Renewal Advisory Team and associated committees for the FEC move**

(b) (7)(E)

Audit Division

Number of Audits Per Cycle*

Election Cycle	Title 52		Title 26
	Authorized	Unauthorized	
2002	27	22	15
2004	28	10	
2006	27	12	
2008	9	28	20
2010	10	17	
2012	5	20	8
2014	5	6	
2016	7		2
Total # of Audits	118	115	45

*These numbers include audits that have not yet been publically released.

(b) (7)(E)

Audit Division – Election Cycle Financial Overview

Overview of Reported Receipts/Disbursements and Transactional Volume for Audited Committees (Average Values)

	2002	2004	2006	2008	2010	2012	2014	2016 ²
Total Receipts	\$3,379,156	\$11,689,325	\$2,237,486	\$36,727,525	\$3,370,769	\$9,137,889	\$5,395,531	\$3,538,282
Total Disbursements	\$3,351,809	\$11,370,358	\$2,234,862	\$35,719,828	\$3,353,567	\$8,816,584	\$5,227,101	\$3,486,119
Transactional Volume ¹	2,146	9,024	3,822	80,111	5,262	6,250	7,321	4,882

¹- Includes only transactional volume from Committee submitted reports, does not include unitemized transactions.

²- 2016 Overview only includes Authorized Committees.

Audit Division - Turn Around Time Issues & Solutions

- **Issue – Committee submitting untimely documentation and large amounts of duplicate records**
 - Solution - Additional training with OGC partners to discuss viable options in requesting documentation; Updating of Records Policy; Following the deadlines outlined in Commission Approved programs; Implementation of new time line to ensure that Pre-Audit, Fieldwork and IAR are sent timely to OGC.
- **Issue – Auditor Training**
 - Solution – Additional training sessions to ensure that auditors receive consistent training to increase technical expertise; Workpaper templates to be instituted to allow for a quicker review process for Audit managers; and new position descriptions and performance standards to be implemented and adopted.

Reports Analysis Division

FY 2017 – 3rd Quarter Highlights

- **(b) (7)(E)**
- **Reviewed 17,739 documents totaling 13,020,190 pages**
- **Sent out 2,065 letters and handled 2,457 calls**
- **Generated 15 referrals (6 OGC, 6 ADRO, 3 Admin Fine)**
- **Coded 1,560 documents and 3,742,169 transactions**
- **RAD staff conducted a Trade Association PAC reporting webinar and a FECfile webinar**
- **RAD staff provided extended phone coverage for the 2017 April Quarterly filing deadline**
- **RAD managers handled OGC inquiries for 51 matters by providing comments on FGCR's and/or answering questions, assisted ADRO with 9 matters, handled 17 inquiries from Commission Offices, 14 inquiries from Audit and 5 inquiries from the Press Office**
- **RAD staff collaborated with OGC and the Information Division on revisions to Forms 8 & 9**
- **RAD staff participated on the Lease Renewal Advisory Team and associated committees for the FEC move**
- **The 2017-2018 RAD Review & Referral Procedures were approved by the Commission**
- **RAD staff participated in the Scam PAC working group**
- **RAD held three brown bag lunch sessions with Commissioners and FEC staff**

Reports Analysis Division

Strategic Plan Performance Measurement: 95% of Reports Coded and Entered within 30 Days of Receipt

Fiscal Year	2015	2016	2017 (10/1/16 – 6/30/17)
Number of Documents Coded	56,327	53,107	8,186
Number of Transactions Coded	23,957,421	19,385,479	17,948,358
% of Paper Filed Reports Made Available to the Public within 2 Business Days of Receipt	91.4%	99.1%	98.7%
% of Reports Coded and Entered within 30 Days of Receipt	91.5%	99.9%	94.9%

Reports Analysis Division

Fiscal Year Summary for Paper Automation System

Fiscal Year	2017 (10/1/16 – 6/30/17)
Documents Processed	7,620
Total Pages Processed	647,728
Total Repairs Made	6,770

Reports Analysis Division

Strategic Plan Performance Measurement: 75% of Reports reviewed within 90 days of receipt

Election Cycle	2010	2012	2014	2016	2018 (Election Cycle to Date)
Documents Reviewed	142,231	144,943	180,975	159,747	18,734
Average Review Days Required per Report	51.53	55.31	43.31	49.59	32.08
Total Page Count of Documents Reviewed	8,792,843	15,634,938	23,798,740	51,459,860	546,792
% of Reports Reviewed within 90 Days	82.72%	80.77%	77.18%	88.68%	85.68%

*74.44% of Reports Reviewed within 90 Days of receipt for second quarter of FY 2017 (10/1/2016-6/30/2017)

Reports Analysis Division

Fiscal Year Overview of Key RAD Deliverables

Fiscal Year	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 – 6/30/17)
Tracked Letters Sent	8,889	10,247	8,346	13,205	8,569	11,483	11,183	9,849
Untracked Letters Sent	1,429	1,868	1,853	2,338	1,651	1,950	2,070	2,027
Referrals	31	89	99	88	59	91	43	41
Admin Fines RTB/FD	75/38	309/272	69/36	194/184	70/55	191/159	83/33	188/100
Telephone Calls Handled	13,923	14,502	16,265	14,254	10,673	11,822	12,362	9,202

Reports Analysis Division

**Strategic Plan Performance Measurement: 75% of RFAI's sent within
40 days of Report Review**

Fiscal Year	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 – 6/30/17)
Number of RFAIs Sent	6,509	5,992	5,310	6,322	4,469	4,694	5,206	597
% of RFAIs Sent within 40 Days of Report Review	87%	76%	63%	72%	84%	92%	92%	93.92%

Reports Analysis Division

(b) (7)(E)

FY	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 – 6/30/17)
Total AF Reports Generated	63	45	98	56	95	46	66	36
Average Processing Days	46.7	52.1	40.5	56.9	55.3	58.7	54.5	55
(b) (7)(E)	63	45	98	51	92	43	66	34
Percentage to Goal	100%	100%	100%	91.07%	96.84%	93.48%	100%	94.44%



Open Audits

As of 7/31/2017
(Confidential and Sensitive)

		<u>Date of Last Action</u>	<u>Audit Manager</u>	<u>Report Track</u>
Pre-Audit				
2016	JILL STEIN FOR PRESIDENT	C00581199	11/30/2016	Burgess B
2016	HALL FOR CONGRESS	C00497859	05/03/2017	Burgess B
2016	MIKE BISHOP FOR CONGRESS	C00561001	05/03/2017	Favin B
2016	MARSHA BLACKBURN FOR CONGRESS, INC.	C00376939	05/03/2017	Morcomb B
2016	FRIENDS OF ERIK PAULSEN	C00439661	05/03/2017	Pacious B
2016	BRIAN HIGGINS FOR CONGRESS	C00401034	05/03/2017	Smith B
2016	TONY CARDENAS FOR CONGRESS	C00498873	05/03/2017	Smith B
				Total - 7
Fieldwork				
2016	O'MALLEY FOR PRESIDENT	C00578658	05/11/2017	Pacious B
2016	KELLY FOR CONGRESS	C00573980	07/10/2017	Morcomb B
				Total - 2
Interim/Preliminary Report Writing				
2014	PERDUE FOR SENATE	C00547570	12/02/2016	Smith B
2014	ARIZONA REPUBLICAN PARTY	C00008227	02/22/2017	Favin B
2014	DEMOCRATIC PARTY OF SOUTH CAROLINA	C00007658	03/14/2017	Burgess B
2014	MASSACHUSETTS DEMOCRATIC STATE CMTE - FED FUNDS ACCT	C00089243	06/09/2017	Smith B
2014	MICHIGAN DEMOCRATIC STATE CENTRAL COMMITTEE	C00031054	06/21/2017	Kodish B
				Total - 5
Draft Final Audit Report Writing				
2012	DEMOCRATIC PARTY OF HAWAII	C00212787	06/23/2017	Kodish B
2012	NEW YORK REPUBLICAN FEDERAL CAMPAIGN COMMITTEE	C00055582	07/07/2017	Burgess B
2014	MCSALLY FOR CONGRESS	C00512236	07/19/2017	Pacious B
				Total - 3
Audit Division Recommendation Memorandum Writing				
2012	FREEDOM'S DEFENSE FUND	C00401786	06/26/2017	Favin B
2012	CONSERVATIVE MAJORITY FUND	C00524454	07/14/2017	Morcomb B
				Total - 2
Audits in OGC				
2014	DEMOCRATIC PARTY OF ARKANSAS	C00024372 IAR	07/10/2017	Morcomb B
				Total - 1
Audits with the Commission				
2012	ILLINOIS REPUBLICAN PARTY	C00005926 ADRM	07/25/2017	Favin B
				Total - 1



Open Audits

As of 7/31/2017
(Confidential and Sensitive)

21 Open Audits

Legend

Track A	Audits with <u>no</u> unresolved legal issues
Track B	State/Local Party audits with findings PAC audits with unresolved legal issues Authorized audits with unresolved legal issues
Track C	Audits with <u>no</u> findings
IAR	Interim Audit Report
PAR	Preliminary Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report
Text	If text is red, the report has not been sent to OGC for a legal analysis



Open Audits

As of 7/31/2017
(Confidential and Sensitive)

Audit Caseload

<u>Audit Manager</u>	<u>Number of Audits</u>	<u>Percent of Total Audits</u> ¹
Burgess	4	19%
Favin	4	19%
Kodish	2	10%
Morcomb	4	19%
Pacious	3	14%
Smith	4	19%
Totals	21	100%

¹ May not total 100% due to rounding



Open Audits

As of 7/31/2017
(Confidential and Sensitive)

Comments

2012

Conservative Majority Fund

(b) (5)

Freedom's Defense Fund

(b) (5)

Hawaii Democratic Party

(b) (5)

Illinois Republican Party

(b) (5)

New York Republican Federal Campaign Committee

(b) (5)

2014

Arizona Republican Party

(b) (5)

Democratic Party of Arkansas

(b) (5)

Democratic Party of South Carolina

(b) (5)

Massachusetts Democratic State Committee

(b) (5)

McSally for Congress

(b) (5)

Michigan Democratic State Central Committee

(b) (5)

Perdue for Senate

(b) (5)

2016

Brian Higgins for Congress

(b) (5)

Friends of Erik Paulsen

(b) (5)

Hall for Congress

(b) (5)

Jill Stein for President

(b) (5)



Open Audits

As of 7/31/2017
(Confidential and Sensitive)

Kelly for Congress

(b) (5)

Marsha Blackburn for Congress, Inc.

(b) (5)

Mike Bishop for Congress

(b) (5)

O'Malley for President

(b) (5)

Tony Cardenas for Congress

(b) (5)



Proposed Final Audit Report - Due Date

As of 7/31/2017

(Confidential and Sensitive)

	<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2012 DEMOCRATIC PARTY OF HAWAII	Kodish	DFAR	Report Writing	10/21/2013
2012 NEW YORK REPUBLICAN FEDERAL CAMPAIGN COMMITTEE	Burgess	DFAR	Report Writing	10/21/2013
2012 FREEDOM'S DEFENSE FUND	Favin	ADRM	Memorandum Writing	02/03/2014
2012 CONSERVATIVE MAJORITY FUND	Lmorcomb	ADRM	Memorandum Writing	02/05/2014
2012 ILLINOIS REPUBLICAN PARTY	Favin	ADRM	Circulated to Commission	10/21/2013
2014 PERDUE FOR SENATE	Smith	IAR	Report Writing	04/24/2015
2014 MCSALLY FOR CONGRESS	Pacious	DFAR	Report Writing	04/24/2015
2014 DEMOCRATIC PARTY OF SOUTH CAROLINA	Burgess	IAR	Report Writing	11/18/2015
2014 DEMOCRATIC PARTY OF ARKANSAS	Lmorcomb	IAR	OGC Reviewing	11/18/2015
2014 ARIZONA REPUBLICAN PARTY	Favin	IAR	Report Writing	11/18/2015
2014 MASSACHUSETTS DEMOCRATIC STATE CMTE - FED FUNDS ACCT	Smith	IAR	Report Writing	11/18/2015
2014 MICHIGAN DEMOCRATIC STATE CENTRAL COMMITTEE	Kodish	IAR	Report Writing	11/18/2015
2016 KELLY FOR CONGRESS	Lmorcomb		Fieldwork	05/03/2017
2016 O'MALLEY FOR PRESIDENT	Pacious		Fieldwork	11/30/2016
2016 MARSHA BLACKBURN FOR CONGRESS, INC.	Lmorcomb		Pre-Audit	05/03/2017
2016 BRIAN HIGGINS FOR CONGRESS	Smith		Pre-Audit	05/03/2017
2016 FRIENDS OF ERIK PAULSEN	Pacious		Pre-Audit	05/03/2017
2016 HALL FOR CONGRESS	Burgess		Pre-Audit	05/03/2017
2016 TONY CARDENAS FOR CONGRESS	Smith		Pre-Audit	05/03/2017
2016 MIKE BISHOP FOR CONGRESS	Favin		Pre-Audit	05/03/2017
2016 JILL STEIN FOR PRESIDENT	Burgess		Pre-Audit	11/30/2016

(b) (7)(E)



Proposed Final Audit Report - Due Date

As of 7/31/2017

(Confidential and Sensitive)

21 Open Audits

Legend

IAR	Interim Audit Report
PAR	Preliminary Audit Report
DFAR	Draft Final Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year: 10/01/2015 To: 09/30/2017

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY-2016	757	Friends of Clyde Holloway for Congress Guillot, Felix	\$0.00	10/19/2015	\$0.00	10/19/2015	\$0.00	Attend FEC seminar	10/19/2016	01/20/2016
	759	All Citizens for Mississippi Vann, Jacqueline	\$2,000.00	10/27/2016	\$2,000.00	03/27/2017	\$0.00	Attend FEC seminar	10/27/2016	03/27/2017
	760	Dewhurst for Texas	\$0.00	03/02/2017		03/02/2017		Committee will file for termination	03/02/2017	01/06/2017
	764	Dewhurst for Texas	\$0.00	03/02/2017		03/02/2017		Committee will file for termination	03/02/2017	01/06/2017
	765	Texans for a Conservative Majority Cubriel, Randy	\$6,150.00	11/21/2015	\$6,150.00	11/02/2015	\$0.00	Conduct & certify internal audit/reconciliation Conduct internal education program for employees or staff	11/21/2016 11/21/2015	10/24/2016 12/15/2015
	767	Joe Carr for Senate Schott, Nate	\$2,250.00	12/18/2015	\$2,250.00	12/17/2015	\$0.00	Committee will file for termination	01/17/2016	08/16/2016
	769	Adkins, Mary Rose National Rifle Association (NRA) of America Political Victory Fund Adkins, Mary Rose National Rifle Association (NRA) of America Political Victory Fund	\$2,750.00	12/02/2015	\$2,750.00	11/19/2015	\$0.00	Conduct & certify internal audit/reconciliation	11/02/2016 11/02/2017	11/14/2016
	772	Lisker, Lisa	\$0.00	08/01/2016				Committee will file for termination	08/01/2016	08/01/2016

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
		Newt 2012						Committee will file for termination	08/01/2016	08/01/2016
	775	May, Jennifer Marjorie 2014	\$0.00	05/24/2016				Committee will file for termination		
	777	Massachusetts Republican Party Anderson, Brent	\$4,500.00	02/07/2016	\$4,500.00	02/05/2016	\$0.00	Conduct & certify internal audit/reconciliation	02/08/2017	06/03/2016
	778	Ohio State Central & Executive Committee (Republican) Armstrong, Maria	\$3,000.00	01/18/2016	\$3,000.00	01/15/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	12/18/2016 03/18/2016	11/14/2016 02/17/2016
	781	Sharon Sund for Congress Roberson, Eugene	\$0.00	05/24/2016				File amended reports Participate in conference call on requirements of FECA	03/28/2016 03/10/2016	06/30/2016 06/30/2016
	782	VANILA SINGH FOR CONGRESS 2014	\$2,300.00	04/19/2016	\$2,300.00	04/08/2016	\$0.00	Committee will file for termination	07/19/2016	03/07/2016
	784	McConnell Senate Committee '14 McConnell Senate Committee '14	\$0.00	05/24/2016				Other	04/25/2016	04/29/2016
	785	Lisker, Lisa House Conservatives Fund	\$0.00	05/24/2016				Develop and enforce internal controls File amended reports	04/21/2016 03/21/2017	03/22/2016
	786	David Vitter for U.S. Senate David Vitter for U.S. Senate David Vitter for U.S. Senate	\$0.00	05/24/2016				Other	03/23/2017 04/25/2016	03/01/2017 04/01/2016
	787	Mackenzie, Scott B. Conservative Majority Fund	\$3,500.00	08/11/2016	\$3,500.00	07/26/2016	\$0.00	Attend FEC seminar File amended reports	07/12/2017 08/11/2016	

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	788	Conservative Campaign Committee	\$4,750.00	10/19/2016	\$4,750.00	11/21/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	04/09/2017 07/19/2016	09/07/2016
	789	Democratic Party Of Hawaii Kong Kee, Florence L.	\$6,375.00	10/28/2016	\$6,375.00	11/08/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	04/28/2017 07/28/2017	
	792	Oakland County Democratic Party	\$10,000.00	11/18/2016	\$10,000.00	09/19/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	05/19/2017 08/19/2016	09/01/2016
	793	Ohio Democratic Party Alberty, Fran	\$3,850.00	07/02/2016	\$3,850.00	07/01/2016	\$0.00	Attend FEC seminar	06/02/2017	
	798	Cotton for Senate	\$2,000.00	09/10/2016	\$2,000.00	08/24/2016	\$0.00	Develop a FEC Compliance Manual	11/10/2016	11/08/2016
	799	Utah State Democrat Committee-Federal Corroon, Peter Utah State Democrat Committee-Federal Corroon, Peter	\$1,550.00	10/10/2016	\$1,550.00	08/24/2016	\$0.00	Other	08/10/2016	08/10/2016
	802	Right to Rise PAC, Inc	\$2,400.00	10/07/2016	\$2,400.00	07/08/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	09/08/2017 12/08/2016	06/22/2016 07/08/2016
	807	Voelter, Dathan Keep the Promise PAC	\$1,425.00	10/22/2016	\$1,425.00	11/01/2016	\$0.00	Committee will file for termination	12/21/2016	02/03/2017
Sub-Total : FY -2016			\$58,800.00		\$58,800.00		\$0.00			
FY -2017	791	Oklahoma Leadership Council Hodges, Peter Leo	\$8,750.00	10/12/2017				Attend FEC seminar	04/12/2018	
	796	Lowey, Keith D. Duckworth for Congress	\$2,280.00	02/19/2017	\$2,280.00	01/06/2017	\$0.00	Committee will file for termination	04/19/2017	01/31/2017

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	800	The 2016 Draft Committee (f/k/a National Draft Ben Carson for President Committee)	\$11,000.00	12/14/2016	\$11,000.00	11/01/2016	\$0.00	Committee will file for termination	04/14/2017	01/12/2017
	803	Majority Committee PAC--MC PAC Thomson, Jill	\$1,575.00	12/14/2016	\$1,575.00	11/23/2016	\$0.00	Attend FEC seminar	11/14/2017	
								Other	12/14/2016	01/25/2017
	804	Americans for a Conservative Direction	\$2,550.00	04/17/2017	\$2,550.00	04/17/2017	\$0.00	None		
	805	Reiff, Neil P., Esq. VoteVets.org Action Fund	\$2,000.00	01/04/2017	\$2,000.00	12/28/2016	\$0.00	Attend FEC seminar	12/07/2017	
								Develop a FEC Compliance Manual	03/05/2017	
	806	Marston, Chris Rodney for Congress	\$3,400.00	11/24/2016	\$3,400.00	03/01/2017	\$0.00	Attend FEC seminar	10/24/2017	09/28/2016
								Develop a FEC Compliance Manual	02/24/2017	02/22/2017
	808	Southwest Regional Council of Carpenters Legislative Improvement Cmte United Brotherhood of Carpenters & Joiners of America (SW CLIC) Thornhill, Randy	\$2,500.00	03/07/2017	\$2,500.00	03/07/2017	\$0.00	Attend FEC seminar	02/07/2018	03/29/2017
								Develop a FEC Compliance Manual	05/08/2017	05/09/2017
	810	Independence USA PAC Gubelli, Diane	\$3,300.00	05/05/2017	\$3,300.00	04/24/2017	\$0.00	Attend FEC seminar	04/05/2018	
								Other	06/05/2017	
	812	Foundation for a Greater America, Inc. Ault, Anastasia	\$3,750.00	05/19/2017				Committee will file for termination	07/19/2017	
	813	Scott Rigell for Congress	\$5,600.00	04/22/2017	\$5,600.00	04/18/2017	\$0.00	Committee will file for termination	05/22/2017	05/15/2017

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		Wood, Joseph B.						Committee will file for termination Other	05/22/2017 04/22/2017	05/15/2017 04/21/2017
	818	Hundley, Seymour Kumar for Congress	\$8,300.00	06/09/2017	\$8,300.00	04/24/2017	\$0.00	Develop a FEC Compliance Manual	08/08/2017	07/11/2017
	819	National Right to Life Victory Fund Cockfield, Wayne	\$3,200.00	06/07/2017	\$3,200.00	04/27/2017	\$0.00	Conduct internal education program for employees or staff	06/09/2017	06/09/2017
Sub-Total : FY -2017			\$58,205.00		\$45,705.00		\$0.00			
Grand Total :			\$117,005.00		\$104,505.00		\$0.00			



AF Performance Goals

Print Date: July 31, 2017

Selected Parameters:

Office: Both

Start Date: 10/01/2016

End Date: 06/30/2017

*Exception: YES



AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date
Processed					
2016	YE	H_S_P_UNAUTH	N	01/31/2017	03/30/2017
2016	30G	UNAUTH	N	12/08/2016	03/28/2017
2016	30G	AUTH	N	12/08/2016	01/23/2017
2016	12G	UNAUTH_Q	Y	10/27/2016	03/20/2017
2016	12G	AUTH	Y	10/27/2016	12/12/2016
2016	12G	UNAUTH_M	Y	10/27/2016	12/12/2016
2016	Q3	H_S_P_UNAUTH	N	10/15/2016	12/06/2016
2016	Q3	H_S_P_UNAUTH	Y	10/15/2016	12/06/2016
2016	M9	P_UNAUTH	N	09/20/2016	11/15/2016
2016	M8	P_UNAUTH	N	08/20/2016	10/17/2016
2017	M4	P_UNAUTH	N	04/20/2017	06/12/2017
2017	Q1	H_S_P	N	04/15/2017	06/12/2017
2017	M3	P_UNAUTH	N	03/20/2017	05/10/2017
2017	M2	P_UNAUTH	N	02/20/2017	04/18/2017

Total AF Reports Processed 14

Average Processing Days 63.36

(b) (7)(E)

Percentage to Goal 85.71%

Processed - No committees

					Action Date
2016	30GR	AUTH	N	01/09/2017	03/09/2017
2016	30GR	AUTH	N	12/22/2016	01/24/2017
2016	M12	P_UNAUTH	N	12/20/2016	01/24/2017
2016	30SG	AUTH	N	12/08/2016	01/17/2017
2016	12GR	AUTH	Y	11/28/2016	01/17/2017
2016	M11	P_UNAUTH	N	11/20/2016	01/17/2017
2016	12GR	AUTH	Y	11/10/2016	12/12/2016
2016	12SG	AUTH	Y	10/27/2016	12/07/2016
2016	M10	P_UNAUTH	N	10/20/2016	12/07/2016

AF Performance Goals

Print Date: 7/31/2017

Appendix E

Page 2 of 6

(b) (7)(E)

(b) (7)(E)



AF Performance Goals

(Confidential and Sensitive)

Processed - No committees

Action Date

2016	M10	P_UNAUTH	Y	10/20/2016	12/07/2016
2016	12P	AUTH	Y	09/01/2016	10/27/2016
2016	12SP	AUTH	Y	09/01/2016	10/27/2016
2016	12P	AUTH	Y	08/27/2016	10/20/2016
2016	12P	AUTH	Y	08/18/2016	10/17/2016
2016	12P	AUTH	Y	08/15/2016	10/03/2016
2016	12PR	AUTH	Y	08/15/2016	10/03/2016
2017	12SPR	AUTH	Y	05/04/2017	06/29/2017
2017	30SG	AUTH	N	05/04/2017	06/29/2017
2017	12SP	AUTH	Y	04/20/2017	06/12/2017
2017	12SG	AUTH	Y	04/06/2017	06/01/2017
2017	12SG	AUTH	Y	03/30/2017	05/18/2017
2017	12SG	AUTH	Y	03/23/2017	05/18/2017

(b) (7)(E)

Total AF Reports Processed-No Committees	22
Average Processing Days	49.73
(b) (7)(E)	
Percentage to Goal	100.00%

Total AF Reports	36
Average Processing Days	55.03
(b) (7)(E)	
Percentage to Goal	94.44%



AF Performance Goals

(Confidential and Sensitive)

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters

RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2016	Q1	3067	C00432096	09/06/2016	11/02/2016	57	Y
2016	12P	3086	C00559492	09/08/2016	11/03/2016	56	Y
2016	48H	3089	C00592659	10/04/2016	11/16/2016	43	Y
2016	Q2	3118	C00588756	10/24/2016	11/16/2016	23	Y
2016	Q2	3124	C00612929	10/25/2016	12/13/2016	49	Y
2016	Q2	3125	C00607564	10/24/2016	12/15/2016	52	Y
2016	Q2	3128	C00586578	10/25/2016	12/15/2016	51	Y
2016	Q2	3130	C00606897	10/25/2016	12/15/2016	51	Y
2016	Q2	3131	C00565598	10/25/2016	12/20/2016	56	Y
2016	Q2	3138	C00520064	10/31/2016	12/28/2016	58	Y
2016	M7	3140	C00438291	10/31/2016	12/28/2016	58	Y
2016	M8	3144	C00496505	11/17/2016	01/12/2017	56	Y
2016	M8	3146	C00544767	11/17/2016	01/12/2017	56	Y
2016	48H	3148	C00266940	11/16/2016	01/11/2017	56	Y
2016	M9	3149	C00496505	11/23/2016	01/12/2017	50	Y
2016	M9	3151	C00544767	11/23/2016	01/12/2017	50	Y
2016	Q3	3163	C00610113	12/27/2016	02/23/2017	58	Y
2016	Q3	3169	C00593103	01/23/2017	03/23/2017	59	Y
2016	Q3	3171	C00581926	02/13/2017	04/13/2017	59	Y
2016	12G	3249	C00558452	05/04/2017	06/29/2017	56	Y
2016	30G	3269	C00603563	04/12/2017	06/09/2017	58	Y
2016	YE	3298	C00610808	05/15/2017	05/31/2017	16	Y
2016	YE	3302	C00622555	05/08/2017	05/26/2017	18	Y
2016	YE	3304	C00603563	05/01/2017	06/09/2017	39	Y



AF Performance Goals

(Confidential and Sensitive)

2016	YE	3312	C00607762	05/08/2017	05/31/2017	23	Y
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Total Challenges Processed	25
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Average Processing Days	48.32
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Total Reports Processed within 60 Days	25
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Percentage to Goal	100.00%
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OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

SENSITIVE

AGENDA DOCUMENT NO. X17-38

AGENDA ITEM

For meeting of 11-7-17



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 31, 2017

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *PCO for AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista Roche *KR*
Acting Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Thomas Hintermister *TH*
Assistant Staff Director
Audit Division

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2017 – 4th Quarter Highlights (7/1/17 - 9/30/17) & FY Statistical Overview

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the fourth quarter (7/1/17 - 9/30/17) and 2017 fiscal year statistical overview. The intent of this document is to proactively provide an update of the workload and achieved results of the Office of Compliance on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during an upcoming Executive Session.

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FEDERAL ELECTION COMMISSION

The attached **Appendix A** provides the Commission with fourth quarter highlights for each office and also a statistical overview of FY 2017 results and progression towards meeting the 2014-2019 Strategic Performance Goals adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled 'Proposed Final Audit Report – Due Date' which highlights the report manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2017 statistics for meeting strategic performance goals related to the Administrative Fine Program.

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the overview.

Alternative Dispute Resolution Office (ADRO)

In the fourth quarter of FY 2017, the ADRO received 12 cases (8 from RAD and 4 from OGC). During this time period, the ADRO closed a total of 4 cases, 2 with approved negotiated settlements, 1 case transferred to OGC, and 1 case returned to RAD. During FY 2017, the ADRO received a total of 31 matters and closed a total of 21, including 15 approved negotiated settlements. In FY 2017, the Commission assessed \$63,055 in civil penalties through approved negotiated settlements, and the office collected \$61,255.

(b) (7)(E)

The ADRO continued to work with the Office of Chief Information Officer (OCIO) regarding the upgrade of the case management system (Law Manager). Work commenced on integrating automated mail merge technology with the system during this quarter. It is anticipated this work will be completed in the first quarter of FY 2018.

Administrative Fine Program (Office of Administrative Review)

During the fourth quarter of FY 2017, the Commission processed 15 Reason to Believe (RTB) findings. OAR received 3 challenges and processed 5 Reviewing Officer Recommendations (RORs). The Commission reviewed final determination recommendations in 76 cases, and made a final determination that the respondents in 75 cases violated 2 U.S.C. § 30104(a) and assessed penalties totaling \$176,120. The Commission also collected \$20,103 in fine payments and prepared 76 cases for public release.

As of October 31, 2017 the Commission has approved a total of 3,136 RTB findings and 3,065 final determination recommendations. The AFP has collected \$4.74 million in 2,528

cases, received 747 challenges, and publicly released 3,055 cases. Of the 747 challenges, the Commission upheld 451 of the RTB findings (60%) with no change in the fine, upheld 126 of the RTB findings (16%) with fines changed, and waived 164 fines (21%). As of October 31, the Commission had not yet made a final determination in the 5 remaining cases.

(b) (7)(E)

(b) (7)(E)

Additionally, the Office of Administrative Review (OAR) forwarded 80% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

Audit Division

During the fourth quarter of FY 2017, the Audit Division processed the following audit reports:

	Audit Report Stage	Number of Reports
Released to Public	Final Audit Report	2
Sent to the Committee	Interim Audit Report	1
	Draft Final Audit Report	2
Circulated to the Commission	Interim Audit Report	1
	Audit Division Recommendation Memorandum	1
	Proposed Final Audit Reports	3
Forwarded to OGC	Interim Audit Report	4
	Draft Final Audit Report	1
	Audit Division Recommendation Memorandum	1
	Total # of Audit Reports	16

Fieldwork is currently on-going for seven audits and the Audit Division has a total of 20 open audits. Two audits were referred to the Office of General Counsel this quarter (Colorado Republican Committee and American Financial Services Association PAC). Two Audit Hearings were held (Conservative Majority Fund and Freedom's Defense Fund) in September 2017. A total of sixteen audit reports were processed in the Audit Division during the 4th quarter.

Audit circulated the Unauthorized RAD Audit Referrals memo for the 2016 cycle on September 20, 2016 which is awaiting Commission approval. The Draft 2016 Unauthorized Audit Program, Materiality Thresholds and Error Definitions were also circulated in September and are also awaiting Commission approval.

With respect to the Presidential Election Campaign Fund (PECF), the Audit Division continues to post the pertinent portion of the monthly PECF reports to the Commission website

and is in process of completing the annual PECF fund balance outlook for the fiscal years 2018–2028. The Audit Division anticipates receiving the budgetary calculation request from the U.S. Treasury in early December 2017 and will circulate these calculations to the Commission in early January 2018. Finally, to account for the regulatory changes applicable to public financing, the Audit Division proposed edits to the document ‘Proposed Revisions to FEC Directive on Convention and General Election Certification Procedures –LRA 1052’. This document was circulated on June 28, 2017 to the Commission and is awaiting Commission approval.

Audit staff collaborated with OCIO on the testing and design of the Audit Report Search System (ARSS) for the FEC website. Additionally, user acceptance testing was also completed in October for ARSS. Audit also participated in discussions concerning Scam PACs and the LRAT working group for the upcoming move.

Additionally, management met with Commission offices to discuss initiatives for the processing of audits. The initiatives discussed at these meeting were incorporated into the Draft 2016 Unauthorized Audit Program, Materiality Thresholds and Error Definitions which is awaiting approval by the Commission. Audit management is also actively working in updating Directive 70 and will be submitting a recommendation to the Commission by the end of the year.

Reports Analysis Division (RAD)

During the fourth quarter of FY 2017, the RAD Correspondence Tracking System was successfully rolled out the public through a portal on the FEC website. The system allows Campaign Finance Analysts to assist committees with questions via email through an approval and tracking system. RAD staff has responded to approximately 40 inquiries to date and continues to work on enhancing the system. In addition, RAD staff continued to participate in the Scam PAC working group with staff from Commission offices, OGC, OCIO, Information Division and Congressional Affairs. The group is working on composing a recommendation memo for Commission consideration.

RAD staff reviewed a total of 16,881 documents totaling 9,081,131 pages during the fourth quarter of FY 2017 and 88.16% of the reports have been reviewed within 90 days of receipt for the current election cycle (Appendix A, page 16). RAD generated and sent 2,922 letters to the filing community during the fourth quarter and for FY 2017, 88% of RFAs were sent within 40 days of the report review date (Appendix A, page 18). Also during the fourth quarter, RAD generated 51 referrals (12 OGC, 8 ADRO, 6 Admin, Fine, 1 Debt Settlement, 24 Audit) and sent 1,416 non-filer notices. Finally, during the fourth quarter, the Reports Processing Branch coded 10,833,802 transactions and 69,190 documents and for FY17, processed 684,747 pages from 8,139 documents in the Paper Automation system.

On the personnel front, during the fourth quarter RAD welcomed three (3) new Campaign Finance Analysts (CFA) and a Coding Clerk, and received Commission approval to fill four (4) additional vacant CFA positions. We are in the process of setting up interviews for these positions. In addition, we are in the process of filling two GS-12 CFA positions vacated by staff transfers to OCIO and the Office of the Secretary. Further, a GS-12 CFA remains detailed

to an Assistant Branch Chief position that was vacated due to a staff transfer to the Staff Director's Office. We have a pending request to the Personnel Committee to fill the vacant Assistant Branch Chief position and hope to fill this quickly. Finally, we have completed interviews for a previously approved Secretary position and are in the process of making a selection and the individual should be onboard by the end of November.

Finally, during the fourth quarter RAD continued to implement events and ideas in response to the Morale Study. We held a process overview session with the Press Office to educate RAD staff on its functions. In addition, we held brown bag lunch sessions with one Commissioner and one with the Deputy Staff Director where staff was able to ask questions related to the FEC move and OHR. We also held Division training sessions and a Division meeting where we issued years of service and performance awards, as well as a peer award. In addition, we started professional development months for each RAD branch where the focus is on working towards individual short and long term goals through training sessions and one-on-one coaching.

Attachments

Appendix A, Fiscal Year 2017 4th Quarter Highlights (7/1/17-9/30/17) & FY Statistical Overview

Appendix B, Open Audits Report

Appendix C, Proposed Final Audit Report – Due Date

Appendix D, ADRO Civil Penalty Report

Appendix E, AF Performance Goals Report

Office of Compliance - ADRO, OAR, Audit & RAD

Fiscal Year 2017 4th Quarter Highlights (7/1/17 – 9/30/17) & FY Statistical Overview

Alternative Dispute Resolution Office

FY 2017 – 4th Quarter Highlights

- **(b) (7)(E)**
- **Circulated memoranda on final votes with an average internal processing time of 164 days for the quarter and 134 days for the fiscal year.**
- **Worked with the OCIO on enhancements to Law Manager to implement a mail merge system to improve the efficiency with which documents can be created.**
- **Acting Director served on Data Act Project Executive Team, Records Scheduling Project Team, the Clean-Up Committee, as a conflict coach, and on the roster of Sharing Neutrals.**

Alternative Dispute Resolution Office

(b) (7)(E)

FY	2009	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 - 9/30/17)
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(b) (7)(E)

Internal Processing Days (avg.)	N/A	N/A	N/A	N/A	70.5	124	116	113	134
Percentage to Goal	N/A	N/A	N/A	N/A	100%	95%	100%	100%	100%
Penalties Assessed	\$198,395	\$93,100	\$43,950	\$140,126	\$36,850	\$255,381	\$141,079	\$58,800	\$63,055
Penalties Collected	\$197,495	\$93,100	\$48,700	\$138,126	\$26,600	\$193,281	\$187,383	\$59,445.78	\$61,255

Office of Administrative Review

FY 2017 – 4th Quarter Highlights

- **Processed 5 Reviewing Officer Recommendations in an average of 58.6 days**
- **Commission closed 8 OAR Final Determination Recommendations**
- **\$131,629 in fine payments collected**
- **Transferred 3 cases to Treasury for debt collection**
- **Continued working with OCIO to modify AF financial reports to accommodate OCFO process changes and increase efficiency. The new reports will be implemented in FY18.**
- **Designed new Status of Payments Report to be added to publicly released case files. This report will be implemented in FY18.**

Office of Administrative Review

(b) (7)(E)

FY	2009	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 - 9/30/17)
Challenges Received	67	11	60	11	26	6	35	12	29
Challenges Closed (FD)	67	9	60	10	31	5	32	11	32
Total Processing Days (avg.)	70	38.77	53.15	46.89	29.86	32.5	48.56	58	50.03
Percentage to Goal	60%	100%	100%	100%	93%	100%	97%	81.8%	96.67%
Fines Assessed (Inclusive of RAD)	\$463,232	\$57,237	\$428,434	\$142,960	\$627,40*	\$139,223	\$290,173	\$133,758	\$446,718
Fines Paid (Inclusive of RAD)	\$388,397	\$90,646	\$344,017	\$101,636	\$540,27*	\$94,171	\$199,948	\$123,838	\$246,247

*Note: Includes \$191,135 civil money penalty for AF# 2512 (Obama for America) as included in Conciliation Agreement for MURs 6078, 6090, 6108, 6139, 6142 and 6214, and AF# 2512. Includes \$20,000 civil money penalty for AF# 2638 (McCain-Palin Compliance Fund Inc.) as included in Conciliation Agreement for MUR 6112.



OAR Challenge Queue

(Confidential and Sensitive)

AF #	ID	Committee Name	Report Year	Type	Reason To Believe Date	Fine	Challenge Rcpt Date	Basis	Reviewed By Date	ROR Circ Date	Days to Review
3298	C00610808	FRIENDS OF PAM TUCKER	2016	YE	04/03/2017	\$3,751	05/15/2017	LOA	07/14/2017	05/31/2017	16
3319	C00608737	COMMITTEE TO ELECT MARK A. HUNT FOR CONGRESS 2016	2016	48H	04/20/2017	\$7,048	05/31/2017	LOA/Not Required to File	07/30/2017	07/28/2017	58
3333	C00550871	ZINKE FOR CONGRESS	2016	48H	07/26/2017	\$3,929	09/01/2017	Committee computer/software/internet issues	10/31/2017	09/20/2017	19
3328	C00476457	CRANE FOR CONGRESS INC	2017	Q1	06/14/2017	\$9,030	09/05/2017	ET	11/04/2017	10/25/2017	50
3343	C00630012	IT STARTS TODAY	2017	MY	09/20/2017	\$11,114	10/25/2017	Committee computer/software/internet issues	12/24/2017		

5

Total Cases to Be Reviewed

Average Review TAT 36

Audit Division

FY 2017 – 4th Quarter Highlights

- **2012 Audits – 4 Remaining of Original 33 Audits – 2 Audits in PFAR stage, 1 Audit awaiting Commission approval, and 1 audit writing ADRM. (b) (7)(E)**
- **Six Title 52 audit (2016 Election Cycle) is in the fieldwork stage**
- **One Title 26 audit is in the fieldwork and one Title 26 audit report will be sent to OGC in November. (2016 Election Cycle)**
- **Audit Division creating templates to allow for the quicker review of workpapers**
- **Collaborated with OGC to generate a Directive 69 Legal Guidance Report for the Commission**
- **Audit staff attended FEC webinars and internal training sessions**
- **Held monthly staff meetings highlighting FECA and Audit principles.**
- **Audit is updating written procedures pertaining to the PECF administration (long range budget estimates) and updating appropriate Directives as necessary. Audit continues to posts the monthly PECF reports on the website**
- **Vetted Press Releases about audit reports for the Press Office**
- **Audit staff participated on the Lease Renewal Advisory Team and associated committees for the FEC move**
- **The 2015-2016 Unauthorized Audit Program, Materiality Thresholds and Error Definitions were circulated for approval.**

(b) (7)(E)

Audit Division

Number of Audits Per Cycle*

Election Cycle	Title 52		Title 26	Total Per Cycle
	Authorized	Unauthorized		
2002	27	22		49
2004	28	10	15	53
2006	27	12		39
2008	9	28	20	57
2010	10	17		27
2012	5	20	8	33
2014	5	6		11
2016	7	TBD	2	9
Total # of Audits	118	115	45	278

*These numbers include audits that have not yet been publically released.

(b) (7)(E)

Audit Division – Election Cycle Financial Overview

Overview of Reported Receipts/Disbursements and Transactional Volume for Audited Committees (Average Values)

	2002	2004	2006	2008	2010	2012	2014	2016 ²
Total Receipts	\$3,379,156	\$11,689,325	\$2,237,486	\$36,727,525	\$3,370,769	\$9,137,889	\$5,395,531	\$3,538,282
Total Disbursements	\$3,351,809	\$11,370,358	\$2,234,862	\$35,719,828	\$3,353,567	\$8,816,584	\$5,227,101	\$3,486,119
Transactional Volume ¹	2,146	9,024	3,822	80,111	5,262	6,250	7,321	4,882

¹- Includes only transactional volume from Committee submitted reports, does not include unitemized transactions.

²- 2016 Overview only includes Authorized Committees.

Reports Analysis Division

FY 2017 – 4th Quarter Highlights

- **(b) (7)(E)**
- **Reviewed 16,881 documents totaling 9,081,131 pages**
- **Sent out 2,922 letters and handled 2,431 calls**
- **Generated 51 referrals (12 OGC, 8 ADRO, 6 Admin Fine, 1 Debt Settlement, 24 Audit)**
- **Coded 15,165 documents and 10,833,802 transactions**
- **RAD staff conducted workshops at the FEC Chicago Regional Conference and two FECfile webinars**
- **RAD staff provided extended phone coverage for the 2017 Mid-Year & July Quarterly filing deadlines**
- **RAD managers handled OGC inquiries for 36 matters by providing comments on FGCR's and/or answering questions, assisted ADRO with 9 matters, handled 13 inquiries from Commission Offices, 16 inquiries from Audit and 2 inquiries from the Press Office**
- **RAD staff participated on the Lease Renewal Advisory Team and associated committees for the FEC move**
- **RAD staff participated in the Scam PAC working group**
- **RAD held brown bag lunch sessions and an office overview with a Commissioner and FEC staff**
- **All RAD Management Year End Performance Assessments and 2017-2018 Performance Management Plans were completed timely**
- **RAD completed the Internal Control Review assessment for FY2017**

Reports Analysis Division

Strategic Plan Performance Measurement: 95% of Reports Coded and Entered within 30 Days of Receipt

Fiscal Year	2015	2016	2017 (10/1/16 – 9/30/17)
Number of Documents Coded	56,327	53,107	61,190
Number of Transactions Coded	23,957,421	19,385,479	28,782,160
% of Paper Filed Reports Made Available to the Public within 2 Business Days of Receipt	91.4%	99.1%	98.7%
% of Reports Coded and Entered within 30 Days of Receipt	91.5%	99.9%	95.9%

Reports Analysis Division

Fiscal Year Summary for Paper Automation System

Fiscal Year	2017 (10/1/16 – 9/30/17)
Documents Processed	8,139
Total Pages Processed	684,747
Total Repairs Made	8,552

Reports Analysis Division

Strategic Plan Performance Measurement: 75% of Reports reviewed within 90 days of receipt

Election Cycle	2010	2012	2014	2016	2018 (Election Cycle to Date)
Documents Reviewed	142,231	144,943	180,975	159,747	35,801
Average Review Days Required per Report	51.53	55.31	43.31	49.59	32.23
Total Page Count of Documents Reviewed	8,792,843	15,634,938	23,798,740	51,459,860	8,370,113
% of Reports Reviewed within 90 Days	82.72%	80.77%	77.18%	88.68%	88.16%

*76.61% of Reports Reviewed within 90 Days of receipt for FY 2017 (10/1/2016-9/30/2017)

Reports Analysis Division

Fiscal Year Overview of Key RAD Deliverables

Fiscal Year	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 – 9/30/17)
Tracked Letters Sent	8,889	10,247	8,346	13,205	8,569	11,483	11,183	12,452
Untracked Letters Sent	1,429	1,868	1,853	2,338	1,651	1,950	2,070	2,344
Referrals	31	89	99	88	59	91	43	95
Admin Fines RTB/FD	75/38	309/272	69/36	194/184	70/55	191/159	83/33	163/168
Telephone Calls Handled	13,923	14,502	16,265	14,254	10,673	11,822	12,362	11,634

Reports Analysis Division

**Strategic Plan Performance Measurement: 75% of RFAI's sent within
40 days of Report Review**

Fiscal Year	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 – 9/30/17)
Number of RFAIs Sent	6,509	5,992	5,310	6,322	4,469	4,694	5,206	5,190
% of RFAIs Sent within 40 Days of Report Review	87%	76%	63%	72%	84%	92%	92%	88%

Reports Analysis Division

(b) (7)(E)

FY	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 – 9/30/17)
Total AF Reports Generated	63	45	98	56	95	46	66	52
Average Processing Days	46.7	52.1	40.5	56.9	55.3	58.7	54.5	54.8
(b) (7)(E)	63	45	98	51	92	43	66	50
Percentage to Goal	100%	100%	100%	91.07%	96.84%	93.48%	100%	96.15%



Open Audits

As of 10/30/2017
(Confidential and Sensitive)

			<u>Date of Last Action</u>	<u>Audit Manager</u>	<u>Report Track</u>
Fieldwork					
2016	JILL STEIN FOR PRESIDENT	C00581199	08/16/2017	Burgess	B
2016	HALL FOR CONGRESS	C00497859	08/30/2017	Burgess	B
2016	FRIENDS OF ERIK PAULSEN	C00439661	09/11/2017	Pacious	B
2016	BRIAN HIGGINS FOR CONGRESS	C00401034	09/20/2017	Smith	B
2016	MARSHA BLACKBURN FOR CONGRESS, INC.	C00376939	09/21/2017	Morcomb	B
2016	MIKE BISHOP FOR CONGRESS	C00561001	09/22/2017	Favin	B
2016	TONY CARDENAS FOR CONGRESS	C00498873	09/22/2017	Smith	B
				Total - 7	
Interim/Preliminary Report Writing					
2014	MASSACHUSETTS DEMOCRATIC STATE CMTE - FED FUNDS ACCT	C00089243	06/09/2017	Smith	B
2014	DEMOCRATIC PARTY OF ARKANSAS	C00024372	08/23/2017	Morcomb	B
2016	O'MALLEY FOR PRESIDENT	C00578658	10/11/2017	Pacious	B
2016	KELLY FOR CONGRESS	C00573980	10/18/2017	Morcomb	B
2014	ARIZONA REPUBLICAN PARTY	C00008227	10/27/2017	Favin	B
				Total - 5	
Interim/Preliminary Audit Report Committee Response Period					
2014	DEMOCRATIC PARTY OF SOUTH CAROLINA	C00007658	09/27/2017	Burgess	B
2014	PERDUE FOR SENATE	C00547570	10/10/2017	Smith	B
				Total - 2	
Draft Final Audit Report Committee Response Period					
2014	MCSALLY FOR CONGRESS	C00512236	10/18/2017	Pacious	B
				Total - 1	
Audit Division Recommendation Memorandum Writing					
2012	DEMOCRATIC PARTY OF HAWAII	C00212787	09/29/2017	Kodish	B
				Total - 1	
Proposed Final Audit Report Writing					
2012	FREEDOM'S DEFENSE FUND	C00401786	10/25/2017	Favin	B
2012	CONSERVATIVE MAJORITY FUND	C00524454	10/25/2017	Morcomb	B
				Total - 2	
Audits in OGC					
2014	MICHIGAN DEMOCRATIC STATE CENTRAL COMMITTEE	C00031054	IAR 10/06/2017	Kodish	B
				Total - 1	
Audits with the Commission					
2012	NEW YORK REPUBLICAN FEDERAL CAMPAIGN COMMITTEE	C00055582	ADRM 10/19/2017	Burgess	B
				Total - 1	



Open Audits

As of 10/30/2017
(Confidential and Sensitive)

20 Open Audits

Legend

Track A	Audits with <u>no</u> unresolved legal issues
Track B	State/Local Party audits with findings PAC audits with unresolved legal issues Authorized audits with unresolved legal issues
Track C	Audits with <u>no</u> findings
IAR	Interim Audit Report
PAR	Preliminary Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report
Text	If text is red, the report has not been sent to OGC for a legal analysis



Open Audits

As of 10/30/2017
(Confidential and Sensitive)

Audit Caseload

<u>Audit Manager</u>	<u>Number of Audits</u>	<u>Percent of Total Audits</u> ¹
Burgess	4	20%
Favin	3	15%
Kodish	2	10%
Morcomb	4	20%
Pacious	3	15%
Smith	4	20%
Totals	20	100%

¹ May not total 100% due to rounding



Open Audits

As of 10/30/2017

(Confidential and Sensitive)

Comments

2012

Conservative Majority Fund

(b) (5)

Freedom's Defense Fund

(b) (5)

Hawaii Democratic Party

(b) (5)

New York Republican Federal Campaign Committee

(b) (5)

2014

Arizona Republican Party

(b) (5)

Democratic Party of Arkansas

(b) (5)

Democratic Party of South Carolina

(b) (5)

Massachusetts Democratic State Committee

(b) (5)

McSally for Congress

(b) (5)

Michigan Democratic State Central Committee

(b) (5)

Perdue for Senate

(b) (5)

2016

Brian Higgins for Congress

(b) (5)

Friends of Erik Paulsen

(b) (5)

Hall for Congress

(b) (5)

Jill Stein for President

(b) (5)

Kelly for Congress

(b) (5)



Open Audits

As of 10/30/2017

(Confidential and Sensitive)

Marsha Blackburn for Congress, Inc.

(b) (5)

Mike Bishop for Congress

(b) (5)

O'Malley for President

(b) (5)

Tony Cardenas for Congress

(b) (5)



Proposed Final Audit Report - Due Date

As of 10/30/2017

(Confidential and Sensitive)

	<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2012 DEMOCRATIC PARTY OF HAWAII	Kodish	ADRM	Memorandum Writing	10/21/2013
2012 NEW YORK REPUBLICAN FEDERAL CAMPAIGN COMMITTEE	Burgess	ADRM	Circulated to Commission	10/21/2013
2012 FREEDOM'S DEFENSE FUND	Favin	PFAR	Report Writing	02/03/2014
2012 CONSERVATIVE MAJORITY FUND	Lmorcomb	PFAR	Report Writing	02/05/2014
2014 PERDUE FOR SENATE	Smith	IAR	Committee Response Period	04/24/2015
2014 MCSALLY FOR CONGRESS	Pacious	DFAR	Committee Response Period	04/24/2015
2014 DEMOCRATIC PARTY OF SOUTH CAROLINA	Burgess	IAR	Committee Response Period	11/18/2015
2014 DEMOCRATIC PARTY OF ARKANSAS	Lmorcomb	IAR	Report Writing	11/18/2015
2014 ARIZONA REPUBLICAN PARTY	Favin	IAR	Report Writing	11/18/2015
2014 MASSACHUSETTS DEMOCRATIC STATE CMTE - FED FUNDS ACCT	Smith	IAR	Report Writing	11/18/2015
2014 MICHIGAN DEMOCRATIC STATE CENTRAL COMMITTEE	Kodish	IAR	OGC Reviewing	11/18/2015
2016 O'MALLEY FOR PRESIDENT	Pacious	IAR	Report Writing	11/30/2016
2016 KELLY FOR CONGRESS	Lmorcomb	IAR	Report Writing	05/03/2017
2016 MARSHA BLACKBURN FOR CONGRESS, INC.	Lmorcomb		Fieldwork	05/03/2017
2016 BRIAN HIGGINS FOR CONGRESS	Smith		Fieldwork	05/03/2017
2016 FRIENDS OF ERIK PAULSEN	Pacious		Fieldwork	05/03/2017
2016 HALL FOR CONGRESS	Burgess		Fieldwork	05/03/2017
2016 TONY CARDENAS FOR CONGRESS	Smith		Fieldwork	05/03/2017
2016 MIKE BISHOP FOR CONGRESS	Favin		Fieldwork	05/03/2017
2016 JILL STEIN FOR PRESIDENT	Burgess		Fieldwork	11/30/2016

(b) (7)(E)



Proposed Final Audit Report - Due Date

As of 10/30/2017

(Confidential and Sensitive)

20 Open Audits

Legend

IAR	Interim Audit Report
PAR	Preliminary Audit Report
DFAR	Draft Final Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year: 10/01/2015 To: 09/30/2018

Period	Cases	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY -2016	757	Friends of Clyde Holloway for Congress Guillot, Felix	\$0.00	10/19/2015	\$0.00	10/19/2015	\$0.00	Attend FEC seminar	10/19/2016	01/20/2016
	759	All Citizens for Mississippi Vann, Jacqueline	\$2,000.00	10/27/2016	\$2,000.00	03/27/2017	\$0.00	Attend FEC seminar	10/27/2016	03/27/2017
	760	Dewhurst for Texas	\$0.00	03/02/2017		03/02/2017		Committee will file for termination	03/02/2017	01/06/2017
	764	Dewhurst for Texas	\$0.00	03/02/2017		03/02/2017		Committee will file for termination	03/02/2017	01/06/2017
	765	Texans for a Conservative Majority Cubriel, Randy	\$6,150.00	11/21/2015	\$6,150.00	11/02/2015	\$0.00	Conduct & certify internal audit/reconciliation Conduct internal education program for employees or staff	11/21/2016 11/21/2015	10/24/2016 12/15/2015
	767	Joe Carr for Senate Schott, Nate	\$2,250.00	12/18/2015	\$2,250.00	12/17/2015	\$0.00	Committee will file for termination	01/17/2016	08/16/2016
	769	Adkins, Mary Rose National Rifle Association (NRA) of America Political Victory Fund Adkins, Mary Rose National Rifle Association (NRA) of America Political Victory Fund	\$2,750.00	12/02/2015	\$2,750.00	11/19/2015	\$0.00	Conduct & certify internal audit/reconciliation	11/02/2016 11/02/2017	11/14/2016
	772	Lisker, Lisa	\$0.00	08/01/2016				Committee will file for termination	08/01/2016	08/01/2016

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
		Newt 2012						Committee will file for termination	08/01/2016	08/01/2016
	775	May, Jennifer Marjorie 2014	\$0.00	05/24/2016				Committee will file for termination		
	777	Massachusetts Republican Party Anderson, Brent	\$4,500.00	02/07/2016	\$4,500.00	02/05/2016	\$0.00	Conduct & certify internal audit/reconciliation	02/08/2017	06/03/2016
	778	Ohio State Central & Executive Committee (Republican) Armstrong, Maria	\$3,000.00	01/18/2016	\$3,000.00	01/15/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	12/18/2016 03/18/2016	11/14/2016 02/17/2016
	781	Sharon Sund for Congress Roberson, Eugene	\$0.00	05/24/2016				File amended reports Participate in conference call on requirements of FECA	03/28/2016 03/10/2016	06/30/2016 06/30/2016
	782	VANILA SINGH FOR CONGRESS 2014	\$2,300.00	04/19/2016	\$2,300.00	04/08/2016	\$0.00	Committee will file for termination	07/19/2016	03/07/2016
	784	McConnell Senate Committee '14 McConnell Senate Committee '14	\$0.00	05/24/2016				Other	04/25/2016	04/29/2016
	785	Lisker, Lisa House Conservatives Fund	\$0.00	05/24/2016				Develop and enforce internal controls File amended reports	04/21/2016 03/21/2017	03/22/2016 04/27/2017
	786	David Vitter for U.S. Senate David Vitter for U.S. Senate David Vitter for U.S. Senate	\$0.00	05/24/2016				Other	03/23/2017 04/25/2016	03/01/2017 04/01/2016
	787	Mackenzie, Scott B. Conservative Majority Fund	\$3,500.00	08/11/2016	\$3,500.00	07/26/2016	\$0.00	Attend FEC seminar File amended reports	07/12/2017 08/11/2016	

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	788	Conservative Campaign Committee	\$4,750.00	10/19/2016	\$4,750.00	11/21/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	04/09/2017 07/19/2016	09/07/2016
	789	Democratic Party Of Hawaii Kong Kee, Florence L.	\$6,375.00	10/28/2016	\$6,375.00	11/08/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	04/28/2017 07/28/2017	05/19/2017 07/28/2017
	792	Oakland County Democratic Party	\$10,000.00	11/18/2016	\$10,000.00	09/19/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	05/19/2017 08/19/2016	09/01/2016
	793	Ohio Democratic Party Alberty, Fran	\$3,850.00	07/02/2016	\$3,850.00	07/01/2016	\$0.00	Attend FEC seminar	06/02/2017	05/18/2017
	798	Cotton for Senate	\$2,000.00	09/10/2016	\$2,000.00	08/24/2016	\$0.00	Develop a FEC Compliance Manual	11/10/2016	11/08/2016
	799	Utah State Democrat Committee-Federal Corroon, Peter Utah State Democrat Committee-Federal Corroon, Peter	\$1,550.00	10/10/2016	\$1,550.00	08/24/2016	\$0.00	Other	08/10/2016	08/10/2016
	802	Right to Rise PAC, Inc.	\$2,400.00	10/07/2016	\$2,400.00	07/08/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	09/08/2017 12/08/2016	06/22/2016 07/08/2016
	807	Voelter, Dalhan Keep the Promise PAC	\$1,425.00	10/22/2016	\$1,425.00	11/01/2016	\$0.00	Committee will file for termination	12/21/2016	02/03/2017
Sub-Total : FY -2016			\$58,800.00		\$58,800.00		\$0.00			
FY -2017	791	Oklahoma Leadership Council Hodges, Peter Leo	\$8,750.00	10/12/2017	\$8,750.00	10/10/2017	\$0.00	Attend FEC seminar	04/12/2018	
	796	Lowey, Keith D. Duckworth for Congress	\$2,280.00	02/19/2017	\$2,280.00	01/06/2017	\$0.00	Committee will file for termination	04/19/2017	01/31/2017

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	800	The 2016 Draft Committee (f/k/a National Draft Ben Carson for President Committee)	\$11,000.00	12/14/2016	\$11,000.00	11/01/2016	\$0.00	Committee will file for termination	04/14/2017	01/12/2017
	803	Majority Committee PAC—MC PAC Thomson, Jill	\$1,575.00	12/14/2016	\$1,575.00	11/23/2016	\$0.00	Attend FEC seminar Other	11/14/2017 12/14/2016	 01/25/2017
	804	Americans for a Conservative Direction	\$2,550.00	04/17/2017	\$2,550.00	04/17/2017	\$0.00	None		
	805	Reiff, Neil P., Esq. VoteVets.org Action Fund	\$2,000.00	01/04/2017	\$2,000.00	12/28/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	12/07/2017 03/05/2017	
	806	Marston, Chris Rodney for Congress	\$3,400.00	11/24/2016	\$3,400.00	03/01/2017	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	10/24/2017 02/24/2017	09/28/2016 02/22/2017
	808	Southwest Regional Council of Carpenters Legislative Improvement Cmte United Brotherhood of Carpenters & Joiners of America (SW CLIC) Thornhill, Randy	\$2,500.00	03/07/2017	\$2,500.00	03/07/2017	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	02/07/2018 05/08/2017	03/29/2017 05/09/2017
	810	Independence USA PAC Gubelli, Diane	\$3,300.00	05/05/2017	\$3,300.00	04/24/2017	\$0.00	Attend FEC seminar Other	04/05/2018 06/05/2017	 05/30/2017
	812	Foundation for a Greater America, Inc. Ault, Anastasia	\$3,750.00	05/19/2017				Committee will file for termination	07/19/2017	
	813	Scott Rigell for Congress	\$5,600.00	04/22/2017	\$5,600.00	04/18/2017	\$0.00	Committee will file for termination	05/22/2017	05/15/2017

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
		Wood, Joseph B.						Committee will file for termination Other	05/22/2017 04/22/2017	05/15/2017 04/21/2017
	818	Hundley, Seymour Kumar for Congress	\$2,300.00	06/09/2017	\$8,300.00	04/24/2017	\$0.00	Develop a FEC Compliance Manual	08/08/2017	07/11/2017
	819	National Right to Life Victory Fund Cockfield, Wayne	\$3,200.00	06/07/2017	\$3,200.00	04/27/2017	\$0.00	Conduct internal education program for employees or staff	06/09/2017	06/09/2017
	820	Working Families Party Independent Expenditure Committee Boland, Mike	\$3,350.00	06/05/2017				Attend FEC seminar Develop a FEC Compliance Manual	07/06/2018 06/04/2017	
	824	Driscoll, Timothy J. Int'l Union of Bricklayers and Allied Craftworkers PAC	\$1,500.00	10/07/2017	\$1,500.00	09/26/2017	\$0.00	Attend FEC seminar	09/08/2018	
Sub-Total : FY-2017			\$63,055.00		\$55,955.00		\$0.00			
Grand Total :			\$121,855.00		\$114,755.00		\$0.00			



AF Performance Goals

Print Date: October 31, 2017

Selected Parameters:

Office: Both
Start Date: 10/01/2016
End Date: 09/30/2017
*Exception: YES



AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
Processed						
2016	YE	H_S_P_UNAUTH	N	01/31/2017	03/30/2017	
2016	30G	UNAUTH	N	12/08/2016	03/28/2017	
2016	30G	AUTH	N	12/08/2016	01/23/2017	
2016	12G	UNAUTH_Q	Y	10/27/2016	03/20/2017	
2016	12G	AUTH	Y	10/27/2016	12/12/2016	
2016	12G	UNAUTH_M	Y	10/27/2016	12/12/2016	
2016	Q3	H_S_P_UNAUTH	N	10/15/2016	12/06/2016	
2016	Q3	H_S_P_UNAUTH	Y	10/15/2016	12/06/2016	
2016	M9	P_UNAUTH	N	09/20/2016	11/15/2016	
2016	M8	P_UNAUTH	N	08/20/2016	10/17/2016	
2017	MY	UNAUTH	N	07/31/2017	09/18/2017	
2017	Q2	H_S_P	N	07/15/2017	09/07/2017	
2017	M8	P_UNAUTH	N	06/20/2017	08/14/2017	
2017	M5	P_UNAUTH	N	05/20/2017	07/18/2017	
2017	M4	P_UNAUTH	N	04/20/2017	06/12/2017	
2017	Q1	H_S_P	N	04/15/2017	06/12/2017	
2017	M3	P_UNAUTH	N	03/20/2017	05/10/2017	
2017	M2	P_UNAUTH	N	02/20/2017	04/18/2017	
Total AF Reports Processed			18			
Average Processing Days			61.33			
(b) (7)(E)						
Percentage to Goal			88.89%			

Processed - No committees

					Action Date	(b) (7)(E)
2016	30GR	AUTH	N	01/09/2017	03/09/2017	
2016	30GR	AUTH	N	12/22/2016	01/24/2017	
2016	M12	P_UNAUTH	N	12/20/2016	01/24/2017	
2016	30SG	AUTH	N	12/08/2016	01/17/2017	
2016	12GR	AUTH	Y	11/28/2016	01/17/2017	



AF Performance Goals

(Confidential and Sensitive)

Processed - No committees

Action Date

2016	M11	P_UNAUTH	N	11/20/2016	01/17/2017
2016	12GR	AUTH	Y	11/10/2016	12/12/2016
2016	12SG	AUTH	Y	10/27/2016	12/07/2016
2016	M10	P_UNAUTH	N	10/20/2016	12/07/2016
2016	M10	P_UNAUTH	Y	10/20/2016	12/07/2016
2016	12P	AUTH	Y	09/01/2016	10/27/2016
2016	12SP	AUTH	Y	09/01/2016	10/27/2016
2016	12P	AUTH	Y	08/27/2016	10/20/2016
2016	12P	AUTH	Y	08/18/2016	10/17/2016
2016	12P	AUTH	Y	08/15/2016	10/03/2016
2016	12PR	AUTH	Y	08/15/2016	10/03/2016
2017	12SP	AUTH	Y	08/03/2017	09/29/2017
2017	30SG	AUTH	N	07/20/2017	09/18/2017
2017	30SGR	AUTH	N	07/20/2017	09/18/2017
2017	M7	P_UNAUTH	N	07/20/2017	09/18/2017
2017	30SGR	AUTH	N	07/06/2017	08/17/2017
2017	30SG	AUTH	N	06/24/2017	08/17/2017
2017	12SG	AUTH	Y	06/08/2017	07/24/2017
2017	12SGR	AUTH	Y	06/08/2017	07/24/2017
2017	12SGR	AUTH	Y	05/25/2017	07/22/2017
2017	30SG	AUTH	N	05/18/2017	07/10/2017
2017	12SG	AUTH	Y	05/13/2017	07/10/2017
2017	30SG	AUTH	N	05/11/2017	07/10/2017
2017	12SPR	AUTH	Y	05/04/2017	06/29/2017
2017	30SG	AUTH	N	05/04/2017	06/29/2017
2017	12SP	AUTH	Y	04/20/2017	06/12/2017
2017	12SG	AUTH	Y	04/06/2017	06/01/2017
2017	12SG	AUTH	Y	03/30/2017	05/18/2017
2017	12SG	AUTH	Y	03/23/2017	05/18/2017

(b) (7)(E)

Total AF Reports Processed-No Committees

34

Average Processing Days

51.41

(b) (7)(E)

Percentage to Goal

100.00%



AF Performance Goals

(Confidential and Sensitive)

Total AF Reports	52
Average Processing Days	54.85

(b) (7)(E)

Percentage to Goal	96.15%
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RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters
RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2016	Q1	3067	C00432096	09/06/2016	11/02/2016	57	Y
2016	12P	3086	C00559492	09/08/2016	11/03/2016	56	Y
2016	48H	3089	C00592659	10/04/2016	11/16/2016	43	Y
2016	Q2	3118	C00588756	10/24/2016	11/16/2016	23	Y
2016	Q2	3124	C00612929	10/25/2016	12/13/2016	49	Y
2016	Q2	3125	C00607564	10/24/2016	12/15/2016	52	Y
2016	Q2	3128	C00586578	10/25/2016	12/15/2016	51	Y
2016	Q2	3130	C00606897	10/25/2016	12/15/2016	51	Y
2016	Q2	3131	C00565598	10/25/2016	12/20/2016	56	Y
2016	Q2	3138	C00520064	10/31/2016	12/28/2016	58	Y
2016	M7	3140	C00438291	10/31/2016	12/28/2016	58	Y
2016	M8	3144	C00496505	11/17/2016	01/12/2017	56	Y
2016	M8	3146	C00544767	11/17/2016	01/12/2017	56	Y
2016	48H	3148	C00266940	11/16/2016	01/11/2017	56	Y
2016	M9	3149	C00496505	11/23/2016	01/12/2017	50	Y
2016	M9	3151	C00544767	11/23/2016	01/12/2017	50	Y
2016	Q3	3163	C00610113	12/27/2016	02/23/2017	58	Y
2016	Q3	3169	C00593103	01/23/2017	03/23/2017	59	Y
2016	Q3	3171	C00581926	02/13/2017	04/13/2017	59	Y
2016	48H	3234	C00484683	03/27/2017	07/06/2017	101	N
2016	12G	3249	C00558452	05/04/2017	06/29/2017	56	Y
2016	30G	3269	C00603563	04/12/2017	06/09/2017	58	Y
2016	YE	3298	C00610808	05/15/2017	05/31/2017	16	Y
2016	YE	3302	C00622555	05/08/2017	05/26/2017	18	Y



AF Performance Goals

(Confidential and Sensitive)

2016	YE	3304	C00603563	05/01/2017	06/09/2017	39	Y
2016	YE	3312	C00607762	05/08/2017	05/31/2017	23	Y
2016	48H	3319	C00608737	05/31/2017	07/28/2017	58	Y
2016	48H	3324	C00578344	06/05/2017	08/04/2017	60	Y
2016	48H	3325	C00459255	07/07/2017	08/31/2017	55	Y
2016	48H	3333	C00550871	09/01/2017	09/20/2017	19	Y

Total Challenges Processed 30

Average Processing Days 50.03

Total Reports Processed within 60 Days 29

Percentage to Goal 96.67%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

2018 JAN 31 PM 1:59

January 31, 2018

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AWH*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista Roche *KR*
Acting Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Thomas Hintermister *TH*
Assistant Staff Director
Audit Division

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2018 – 1st Quarter Highlights (10/1/17 – 12/31/17) & FY Statistical Overview

SENSITIVE

AGENDA ITEM

For Meeting of 2-6-18

SUBMITTED LATE

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the first quarter (10/1/17 – 12/31/17) and 2018 fiscal year statistical overview. The intent of this document is to proactively provide an update of the workload and achieved results of the Office of Compliance on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during an upcoming Executive Session.

The attached **Appendix A** provides the Commission with first quarter highlights for each office and also a statistical overview of FY 2018 results and progression towards meeting the 2014-2019 Strategic Performance Goals adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled 'Proposed Final Audit Report – Due Date' which highlights the report manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2018 statistics for meeting strategic performance goals related to the Administrative Fine Program.

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the overview.

Alternative Dispute Resolution Office (ADRO)

In the first quarter of FY 2018, the ADRO received 16 cases (7 from RAD, 5 from Audit, 3 from the Commission, and 1 from OGC). During this time period, the ADRO closed a total of 10 cases, 9 with approved negotiated settlements and 1 case transferred to OGC. In FY 2018, the Commission assessed \$31,025 in civil penalties through approved negotiated settlements, and the office collected \$28,875. (b) (7)(E)
(b) (7)(E)

The ADRO continued to work with the Office of Chief Information Officer (OCIO) regarding the upgrade of the case management system (Law Manager). Work was completed on integrating automated mail merge technology with the system during this quarter.

Administrative Fine Program (Office of Administrative Review)

During the first quarter of FY 2018, the Commission processed 6 Reason to Believe (RTB) findings. OAR received 4 challenges and processed 4 Reviewing Officer Recommendations (RORs). The Commission reviewed final determination recommendations in 12 cases, and made a final determination that the respondents in these cases violated 2 U.S.C. § 30104(a) and assessed penalties totaling \$53,484. The Commission also collected \$77,002 in fine payments and prepared 10 cases for public release.

As of January 31, 2018 the Commission has approved a total of 3,144 RTB findings and 3,078 final determination recommendations. The AFP has collected \$4.74 million, received 751 challenges, and publicly released 3,061 cases. Of the 751 challenges, the Commission upheld 452 of the RTB findings (60%) with no change in the fine, upheld 128 of the RTB findings (17%) with fines changed, and waived 165 fines (22%). As of January 31, the Commission had not yet made a final determination in the 5 remaining cases.

(b) (7)(E)

(b) (7)(E)

Additionally, the Office of

Administrative Review (OAR) forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

During the first quarter, the Reviewing Officer worked with OCIO and OCFO to implement new financial reports to accommodate OCFO reporting requirements and increase efficiency in reconciliation. The Reviewing Officer also worked with OCIO, OGC, and Public Records to implement a Status of Payments Report for publicly released case files. The report contains a snapshot of all payments received and the outstanding balance of a given AF case. The new report has significantly streamlined the process of adding payment documentation to existing case files.

Audit Division

During the first quarter of FY 2018, the Audit Division processed the following audit reports:

	Audit Report Stage	Number of Reports
Released to Public	Final Audit Report	3
Sent to the Committee	Interim Audit Report	2
	Draft Final Audit Report	1
Circulated to the Commission	Interim Audit Report	4
	Audit Division Recommendation Memorandum	4
	Proposed Final Audit Reports	2
Forwarded to OGC	Interim Audit Report	3
	Draft Final Audit Report	1
	Audit Division Recommendation Memorandum	4
	Total # of Audit Reports	24

The Audit Division has a total of 26 open audits. Two audits were referred to the Office of General Counsel this quarter (Conservative Majority Fund and Illinois Republican Party). One Audit Hearing was requested and granted for February 8, 2018 (McSally for Congress).

Audit circulated and the Commission approved a total of eight Unauthorized Audits for the 2016 cycle. Five of these audits have received the preliminary records for fieldwork and two have recently been notified of the audits. The 2016 Unauthorized Audit Program, Materiality Thresholds and Error Definitions were approved.

With respect to the Presidential Election Campaign Fund (PECF), the Audit Division continues to post the pertinent portion of the monthly PECF reports to the Commission website. Further, in December 2017, the Audit Division prepared the budgetary calculations for the PECF's fiscal years 2018 through 2028. The Commission subsequently approved the

calculations. The Audit Division also updated the list of the Commission's authorized signatories for the calendar year 2018 and provided it to the Secretary of the U.S. Treasury. Finally, to account for the regulatory changes applicable to public financing, the Audit Division proposed edits to the document 'Proposed Revisions to FEC Directive on Convention and General Election Certification Procedures -LRA 1052'. This document was circulated on June 28, 2017 to the Commission and is awaiting Commission approval.

Audit staff continues to collaborate with OCIO on the testing and design of the Audit Report Search System (ARSS) for the FEC website. Audit also participated in discussions concerning the LRAT working group for the upcoming move. All Audit managers completed management training courses to fulfill the 3 year OPM requirement, and also completed the OPM Leadership 360 assessments and briefings.

Additionally, a joint task force has been created with the Office of Compliance Advice in OGC to jointly develop initiatives in the processing of audits.

Reports Analysis Division (RAD)

During the first quarter of FY 2018, RAD focused heavily on training opportunities for staff and managers. All RAD managers completed management training courses to fulfill the 3 year OPM requirement, and several RAD managers attended the in-house Diversity/Engagement training sessions. RAD management coordinated additional professional development opportunities for staff including, a Strength Finders training session which focused on developing individual strengths, and a Rescue Bear Team Event, where team members worked together to solve problems in order to acquire materials to build teddy bears for children who have been through traumatic events. RAD also held two overview sessions for staff with OGC – Compliance Advice Team and the Electronic Filing Office.

RAD staff reviewed a total of 14,322 documents totaling 13,237,752 pages during the first quarter of FY 2018 and 89.02% of the reports were reviewed within 90 days of receipt for the current election cycle (Appendix A, page 15). RAD generated and sent 1,548 letters to the filing community during the first quarter and for FY 2018. 90% of RFAs were sent within 40 days of the report review date (Appendix A, page 17). Also during the first quarter, RAD generated 13 referrals (5 OGC, 7 ADRO, 1 Debt Settlement) and sent 207 non-filer notices. Finally, during the first quarter, the Reports Processing Branch coded 4,970,919 transactions and 1,527 documents and processed 154,757 pages from 1,450 documents in the Paper Automation system.

RAD welcomed a new Secretary during the first quarter and filled two (2) Senior Campaign Finance & Reviewing Analyst (GS-12) promotion positions. In addition, upon receiving approval, RAD made selections to fill four (4) Campaign Finance Analyst (CFA) positions and we expect these new analysts to begin in February. RAD is working with OHR on the posting to fill the Assistant Branch Chief position on the Authorized Branch that was vacated due to a staff transfer to the Staff Director's Office. We expect to have this position filled internally by mid-February and will backfill the previously approved GS-12 position vacated as

result, shortly thereafter. Finally, one (1) CFA resigned during the quarter and one (1) Data Disclosure Assistant announced retirement plans. As a result, we will be seeking Commission approval to back fill these positions, as well as three (3) additional GS-7 CFA positions vacated by the GS-12 promotions.

Finally, during the first quarter, RAD collaborated with others within the agency on several projects. RAD staff assisted the Information Division with the review of the 2018 Federal Election Activity timeframes, Record articles, Tips for Treasurers, and the reporting sections for the revised Corporate & Labor Campaign Guide. RAD staff was very active during the first quarter on committees associated with the move, including the Furniture committee, the Clean-up committee, and the Records Management/Clean-up effort. In addition, RAD staff represented the Office of Compliance in negotiations with the Union for seat selection.

Attachments

Appendix A, FY 2018 Highlights and FY Overview for Office of Compliance Goals

Appendix B, Open Audits Report

Appendix C, Proposed Final Audit Report – Due Date

Appendix D, ADRO Civil Penalty Report

Appendix E, AF Performance Goals Report

Office of Compliance - ADRO, OAR, Audit & RAD

**Fiscal Year 2018
1st Quarter Highlights (10/1/17 – 12/31/17)
&
FY Statistical Overview**

Alternative Dispute Resolution Office

FY 2018 – 1st Quarter Highlights

- **(b) (7)(E)**
- **Circulated memoranda on final votes with an average internal processing time of 127 days for the quarter.**
- **Exceeded performance metrics while operating with reduced staff during a period in which caseload was 60% higher than in the previous election cycle.**
- **Worked with the OCIO on continuing to enhance the recently implemented mail merge functionality in Law Manager to improve the efficiency with which documents can be created.**
- **Submitted approval to NARA to consider ADR records media neutral in order to improve operational efficiency and decrease costs associated with maintaining paper records.**
- **Acting Director earned her Certificate in Public Leadership through the Brookings Institute.**
- **Acting Director served on Data Act Project Executive Team, Records Scheduling Project Team, the Clean-Up Committee, as a conflict coach, and on the roster of Sharing Neutrals.**

Alternative Dispute Resolution Office

(b) (7)(E)

FY	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018 (10/1/17 - 12/31/17)
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(b) (7)(E)

Internal Processing Days (avg.)	N/A	N/A	N/A	N/A	70.5	124	116	113	134	127
Percentage to Goal	N/A	N/A	N/A	N/A	100%	95%	100%	100%	100%	92%
Penalties Assessed	\$198,395	\$93,100	\$43,950	\$140,126	\$36,850	\$255,381	\$141,079	\$58,800	\$63,055	\$31,025
Penalties Collected	\$197,495	\$93,100	\$48,700	\$138,126	\$26,600	\$193,281	\$187,383	\$59,446	\$61,255	\$28,875

Office of Administrative Review

FY 2018 – 1st Quarter Highlights

- **Processed 4 Reviewing Officer Recommendations in an average of 52.5 days**
- **Commission closed 3 OAR Final Determination Recommendations**
- **\$77,002 in fine payments collected**
- **Transferred 15 cases to Treasury for debt collection**
- **Implemented new AF financial reports to accommodate OCFO process/reporting changes and increase efficiency.**
- **Implemented new Status of Payments Report for publicly released case files. The report details all payments received and outstanding balance of the AF case.**

Office of Administrative Review

(b) (7)(E)

FY	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018 (10/1/17 – 12/31/17)
Challenges Received	67	11	60	11	26	6	35	12	29	4
Challenges Closed (FD)	67	9	60	10	31	5	32	11	32	3
Total Processing Days (avg.)	70	38.77	53.15	46.89	29.86	32.5	48.56	58	50.03	52.5
Percentage to Goal	60%	100%	100%	100%	93%	100%	97%	81.8%	96.67%	100%
Fines Assessed (Inclusive of RAD)	\$463,232	\$57,237	\$428,434	\$142,960	\$627,408*	\$139,223	\$290,173	\$133,758	\$446,718	\$53,484
Fines Paid (Inclusive of RAD)	\$388,397	\$90,646	\$344,017	\$101,636	\$540,273*	\$94,171	\$199,948	\$123,838	\$246,247	\$77,002

*Note: Includes \$191,135 civil money penalty for AF# 2512 (Obama for America) as included in Conciliation Agreement for MURs 6078, 6090, 6108, 6139, 6142 and 6214, and AF# 2512. Includes \$20,000 civil money penalty for AF# 2638 (McCain-Palin Compliance Fund Inc.) as included in Conciliation Agreement for MUR 6112.



OAR Challenge Queue

(Confidential and Sensitive)

AF #	ID	Committee Name	Report Year	Type	Reason To Believe Date	Fine	Challenge Rcpt Date	Basis	Reviewed By Date	ROR Circ Date	Days to Review
3319	C00608737	COMMITTEE TO ELECT MARK A HUNT FOR CONGRESS 2016	2016	48H	04/20/2017	\$7,048	05/31/2017	LOA/Not Required to File	07/30/2017	07/28/2017	58
3343	C00630012	IT STARTS TODAY	2017	MY	09/20/2017	\$11,114	10/24/2017	Contractor/ Vender Error	12/23/2017	12/20/2017	57
3336	C00607762	SOULES FOR US CONGRESS	2016	48H	08/31/2017	\$11,845	10/31/2017	CE	12/30/2017	12/28/2017	58
3351	C00640219	PAULA SWEARENGIN 2018	2017	Q3	11/30/2017	\$2,919	12/28/2017	First Time Candidate/ New Committee /Voluntary Senate E-Filing	02/26/2018		
3350	C00440909	BYRNE FOR CONGRESS	2017	Q3	11/30/2017	\$4,862	01/09/2018	Not Required to File	03/10/2018		

5 Total Cases to Be Reviewed

Average Review TAT 58

Audit Division

FY 2018 – 1st Quarter Highlights

- 2012 Audits (Title 52) – 2 Remaining of Original 33 Audits – 2 Audits awaiting Commission approval. (b) (7)(E)
(b) (7)(E)
- 2016 Audits (Title 52)- 8 Pre-Audit Stage, 6 Interim Audit Writing Stage, 1- Awaiting Committee Response to Exit Conference
- 2016 Audits (Title 26) – 1- Preliminary Audit Writing Stage, 1- Awaiting Commission Approval.
- Collaborated with OGC to generate a Directive 69 Legal Guidance Report for the Commission
- Audit staff attended FEC webinars and internal training sessions
- Held monthly staff meetings highlighting FECA and Audit principles.
- Audit updated written procedures pertaining to the PECF administration (long range budget estimates) and proposed updates to Directive 23 which are currently pending before the Commission. Audit completed and the Commission approved the Long Range Budget Estimates for fiscal years 2018 – 2028. Audit continues to posts the monthly PECF reports to the FEC website.
- Vetted Press Releases concerning audit reports for the Press Office
- Audit staff participated on the Lease Renewal Advisory Team and associated committees for the FEC move
- The 2015-2016 Unauthorized Audit Program, Materiality Thresholds and Error Definitions were approved.
- All Audit Managers completed the OPM 360 Review.

(b) (7)(E)

Audit Division

Number of Audits Per Cycle*

Election Cycle	Title 52		Title 26	Total Per Cycle
	Authorized	Unauthorized		
2002	27	22		49
2004	28	10	15	53
2006	27	12		39
2008	9	28	20	57
2010	10	17		27
2012	5	20	8	33
2014	5	6		11
2016	7	8	2	17
Total # of Audits	118	123	45	286

*These numbers include audits that have not yet been publically released.

(b) (7)(E)

(b) (7)(E)

Audit Division – Election Cycle Financial Overview

Overview of Reported Receipts/Disbursements and Transactional Volume for Audited Committees (Average Values)

	2002	2004	2006	2008	2010	2012	2014	2016 ¹
Total Receipts	\$3,379,156	\$11,689,325	\$2,237,486	\$36,727,525	\$3,370,769	\$9,137,889	\$5,395,531	\$37,437,735
Total Disbursements	\$3,351,809	\$11,370,358	\$2,234,862	\$35,719,828	\$3,353,567	\$8,816,584	\$5,227,101	\$37,577,546
Transactional Volume ¹	2,146	9,024	3,822	80,111	5,262	6,250	7,321	125,017

¹ Includes only transactional volume from Committee submitted reports, does not include unitemized transactions.

² 2016 Overview now includes information for 8 unauthorized and 8 authorized audits.

Reports Analysis Division

FY 2018 – 1st Quarter Highlights

- **(b) (7)(E)**
- **Reviewed 14,322 documents totaling 13,237,752 pages**
- **Sent out 1,548 letters and handled 2,104 calls**
- **Generated 13 referrals (5 OGC, 7 ADRO, 1 Debt Settlement)**
- **Coded 1,527 documents and 4,970,919 transactions**
- **RAD gained Commission approval of a redacted version of the 2017-2018 RAD Review & Referral Procedures and posted document on FEC website**
- **RAD staff conducted workshops at the FEC Washington DC Regional Conference**
- **RAD staff presented reporting and FECfile webinars for Candidate Committees and a reporting webinar for Nonconnected committees**
- **RAD staff provided extended phone coverage for the 2017 October Quarterly filing deadline**
- **RAD managers handled OGC inquiries for 35 matters by providing comments on FGCR's and/or answering questions, assisted ADRO with 20 matters, handled 16 inquiries from Commission Offices, 18 inquiries from Audit and 2 inquiries from the Press Office**
- **RAD staff participated on the Lease Renewal Advisory Team and associated committees for the FEC move**
- **RAD held office overviews for staff with OGC – Compliance Advice Team and the Electronic Filing Office**
- **All RAD managers completed required management training to meet the 3 year OPM requirement.**
- **RAD Management revised all Position Descriptions for the division**

Reports Analysis Division

Strategic Plan Performance Measurement: 95% of Reports Coded and Entered within 30 Days of Receipt

Fiscal Year	2015	2016	2017	2018 (10/1/17 – 12/31/17)
Number of Documents Coded	56,327	53,107	61,190	1,527
Number of Transactions Coded	23,957,421	19,385,479	28,782,160	4,970,919
% of Paper Filed Reports Made Available to the Public within 2 Business Days of Receipt	91.4%	99.1%	98.7%	98%
% of Reports Coded and Entered within 30 Days of Receipt	91.5%	99.9%	95.9%	99.9%

Reports Analysis Division

Fiscal Year Summary for Paper Automation System

Fiscal Year:	2017	2018 (10/1/17 – 12/31/17)
Documents Processed	8,139	1,450
Total Pages Processed	684,747	154,757
Total Repairs Made	8,552	1,145

Reports Analysis Division

Strategic Plan Performance Measurement: 75% of Reports reviewed within 90 days of receipt

Election Cycle	2010	2012	2014	2016	2018 (Election Cycle to Date)
Documents Reviewed	142,231	144,943	180,975	159,747	48,480
Average Review Days Required per Report	51.53	55.31	43.31	49.59	31.60
Total Page Count of Documents Reviewed	8,792,843	15,634,938	23,798,740	51,459,860	20,230,890
% of Reports Reviewed within 90 Days	82.72%	80.77%	77.18%	88.68%	89.02%

*86.98% of Reports Reviewed within 90 Days of receipt for FY 2017 (10/1/2017-12/31/2017)

Reports Analysis Division

Fiscal Year Overview of Key RAD Deliverables

Fiscal Year	2011	2012	2013	2014	2015	2016	2017	2018 (10/1/17 – 12/31/17)
Tracked Letters Sent	10,247	8,346	13,205	8,569	11,483	11,183	12,452	1,341
Untracked Letters Sent	1,868	1,853	2,338	1,651	1,950	2,070	2,344	207
Referrals	89	99	88	59	91	43	95	13
Admin Fines RTB/FD	309/272	69/36	194/184	70/55	191/159	83/33	163/168	6/9
Telephone Calls Handled	14,502	16,265	14,254	10,673	11,822	12,362	11,634	2,104

Reports Analysis Division

**Strategic Plan Performance Measurement: 75% of RFAI's sent within
40 days of Report Review**

Fiscal Year	2011	2012	2013	2014	2015	2016	2017	2018 (10/1/17 – 12/31/17)
Number of RFAs Sent	5,992	5,310	6,322	4,469	4,694	5,206	5,190	1,341
% of RFAs Sent within 40 Days of Report Review	76%	63%	72%	84%	92%	92%	88%	90%

Reports Analysis Division

(b) (7)(E)

FY	2011	2012	2013	2014	2015	2016	2017	2018 (10/1/17- 12/31/17)
Total AF Reports Generated	45	98	56	95	46	66	52	8

Average Processing Days	52.1	40.5	56.9	55.3	58.7	54.5	54.8	44.4
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(b) (7)(E)

	45	98	51	92	43	66	50	8
Percentage to Goal	100%	100%	91.07%	96.84%	93.48%	100%	96.15%	100%



Open Audits

As of 1/31/2018

(Confidential and Sensitive)

			<u>Date of Last Action</u>	<u>Audit Manager</u>	<u>Report Track</u>
Pre-Audit					
2016	SOUTH DAKOTA DEMOCRATIC PARTY	C00160937	11/29/2017	Favin	B
2016	ZENEC INC. POLITICAL ACTION COMMITTEE	C00279455	11/29/2017	Favin	B
2016	THE 2016 COMMITTEE	C00569905	11/29/2017	Favin	B
2016	NEW JERSEY REPUBLICAN STATE COMMITTEE	C00164418	11/29/2017	Morcomb	B
2016	OKLAHOMA DEMOCRATIC PARTY	C00190934	11/29/2017	Morcomb	B
2016	AMBULATORY SURGERY CENTER ASSOCIATION PAC (ASCAPAC)	C00424788	11/29/2017	Pacious	B
2016	TENNESSEE DEMOCRATIC PARTY	C00167346	01/26/2018	Burgess	B
2016	MISSISSIPPI REPUBLICAN PARTY	C00084368	01/26/2018	Pacious	B
					Total - 8
Interim/Preliminary Report Writing					
2014	MASSACHUSETTS DEMOCRATIC STATE CMTE - FED FUNDS ACCT	C00089243	06/09/2017	Smith	B
2016	BRIAN HIGGINS FOR CONGRESS	C00401034	12/06/2017	Smith	B
2016	HALL FOR CONGRESS	C00497859	12/12/2017	Burgess	B
2016	JILL STEIN FOR PRESIDENT	C00581199	12/20/2017	Burgess	B
2016	FRIENDS OF ERIK PAULSEN	C00439661	12/21/2017	Pacious	B
2016	MIKE BISHOP FOR CONGRESS	C00561001	12/26/2017	Favin	B
2016	TONY CARDENAS FOR CONGRESS	C00498873	01/03/2018	Smith	B
2016	MARSHA BLACKBURN FOR CONGRESS, INC.	C00376939	01/25/2018	Morcomb	B
					Total - 8
Interim/Preliminary Audit Report Committee Response Period					
2016	KELLY FOR CONGRESS	C00573980	01/17/2018	Morcomb	B
2014	DEMOCRATIC PARTY OF ARKANSAS	C00024372	01/25/2018	Morcomb	B
					Total - 2
Draft Final Audit Report Writing					
2014	DEMOCRATIC PARTY OF SOUTH CAROLINA	C00007658	11/16/2017	Burgess	B
2014	PERDUE FOR SENATE	C00547570	11/29/2017	Smith	B
2014	MICHIGAN DEMOCRATIC STATE CENTRAL COMMITTEE	C00031054	01/17/2018	Smith	B
					Total - 3
Audits with Hearing Requests					
2014	MCSALLY FOR CONGRESS	C00512236	02/08/2018	Pacious	B
					Total - 1
Audits with the Commission					
2014	ARIZONA REPUBLICAN PARTY	C00008227	IAR 12/27/2017	Favin	B
2016	O'MALLEY FOR PRESIDENT	C00578658	PAR 01/19/2018	Pacious	B
2012	DEMOCRATIC PARTY OF HAWAII	C00212787	PFAR 01/24/2018	Pacious	B
2012	NEW YORK REPUBLICAN FEDERAL CAMPAIGN COMMITTEE	C00055582	PFAR 01/30/2018	Burgess	B
					Total - 4



Open Audits

As of 1/31/2018
(Confidential and Sensitive)

26 Open Audits

Legend

Track A	Audits with <u>no</u> unresolved legal issues
Track B	State/Local Party audits with findings PAC audits with unresolved legal issues Authorized audits with unresolved legal issues
Track C	Audits with <u>no</u> findings
IAR	Interim Audit Report
PAR	Preliminary Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report
Text	If text is red, the report has not been sent to OGC for a legal analysis



Open Audits

As of 1/31/2018
(Confidential and Sensitive)

Audit Caseload

<u>Audit Manager</u>	<u>Number of Audits</u>	<u>Percent of Total Audits ¹</u>
Burgess	5	19%
Favin	5	19%
Morcomb	5	19%
Pacious	6	23%
Smith	5	19%
Totals	26	100%

¹ May not total 100% due to rounding



Open Audits
As of 1/31/2018
(Confidential and Sensitive)

Comments

2012

Hawaii Democratic Party
(b) (5)

New York Republican Federal Campaign Committee
(b) (5)

2014

Arizona Republican Party
(b) (5)

Democratic Party of Arkansas
(b) (5)

Democratic Party of South Carolina
(b) (5)

Massachusetts Democratic State Committee
(b) (5)

McSally for Congress
(b) (5)

Michigan Democratic State Central Committee
(b) (5)

Perdue for Senate
(b) (5)

2016

Amblulatory Surgery Center Assoc. PAC (ASCAPAC)
(b) (5)

Brian Higgins for Congress
(b) (5)

Friends of Erik Paulsen
(b) (5)

Hall for Congress
(b) (5)

Jill Stein for President
(b) (5)

Kelly for Congress
(b) (5)

Marsha Blackburn for Congress, Inc.
(b) (5)



Open Audits
As of 1/31/2018
(Confidential and Sensitive)

Mike Bishop for Congress
(b) (5)

Mississippi Republican Party
(b) (5)

New Jersey Republican State Committee
(b) (5)

Oklahoma Democratic Party
(b) (5)

O'Malley for President
(b) (5)

South Dakota Democratic Party
(b) (5)

Tennessee Democratic Party
(b) (5)

The 2016 Committee
(b) (5)

Tony Cardenas for Congress
(b) (5)

Zeneca Inc. PAC
(b) (5)



Proposed Final Audit Report - Due Date

As of 1/31/2018

(Confidential and Sensitive)

	<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2012 DEMOCRATIC PARTY OF HAWAII	Pacious	PFAR	Circulated to Commission	10/21/2013
2012 NEW YORK REPUBLICAN FEDERAL CAMPAIGN COMMITTEE	Burgess	PFAR	Circulated to Commission	10/21/2013
2014 PERDUE FOR SENATE	Smith	DFAR	Report Writing	04/24/2015
2014 MCSALLY FOR CONGRESS	Pacious	DFAR	Hearing Request	04/24/2015
2014 DEMOCRATIC PARTY OF SOUTH CAROLINA	Burgess	DFAR	Report Writing	11/18/2015
2014 DEMOCRATIC PARTY OF ARKANSAS	Lmorcomb	IAR	Committee Response Period	11/18/2015
2014 ARIZONA REPUBLICAN PARTY	Favin	IAR	Circulated to Commission	11/18/2015
2014 MASSACHUSETTS DEMOCRATIC STATE CMTE - FED FUNDS ACCT	Smith	IAR	Report Writing	11/18/2015
2014 MICHIGAN DEMOCRATIC STATE CENTRAL COMMITTEE	Smith	DFAR	Report Writing	11/18/2015
2016 O'MALLEY FOR PRESIDENT	Pacious	PAR	Circulated to Commission	11/30/2016
2016 KELLY FOR CONGRESS	Lmorcomb	IAR	Committee Response Period	05/03/2017
2016 JILL STEIN FOR PRESIDENT	Burgess	IAR	Report Writing	11/30/2016
2016 HALL FOR CONGRESS	Burgess	IAR	Report Writing	05/03/2017
2016 FRIENDS OF ERIK PAULSEN	Pacious	IAR	Report Writing	05/03/2017
2016 BRIAN HIGGINS FOR CONGRESS	Smith	IAR	Report Writing	05/03/2017
2016 MARSHA BLACKBURN FOR CONGRESS, INC.	Lmorcomb	IAR	Report Writing	05/03/2017
2016 TONY CARDENAS FOR CONGRESS	Smith	IAR	Report Writing	05/03/2017
2016 MIKE BISHOP FOR CONGRESS	Favin	IAR	Report Writing	05/03/2017
2016 MISSISSIPPI REPUBLICAN PARTY	Pacious		Pre-Audit	01/26/2018
2016 SOUTH DAKOTA DEMOCRATIC PARTY	Favin		Pre-Audit	11/29/2017
2016 NEW JERSEY REPUBLICAN STATE COMMITTEE	Lmorcomb		Pre-Audit	11/29/2017
2016 TENNESSEE DEMOCRATIC PARTY	Burgess		Pre-Audit	01/26/2018
2016 OKLAHOMA DEMOCRATIC PARTY	Lmorcomb		Pre-Audit	11/29/2017
2016 ZENEC INC. POLITICAL ACTION COMMITTEE	Favin		Pre-Audit	11/29/2017
2016 AMBULATORY SURGERY CENTER ASSOCIATION PAC (ASCAPAC)	Pacious		Pre-Audit	11/29/2017
2016 THE 2016 COMMITTEE	Favin		Pre-Audit	11/29/2017

(b) (7)(E)



Proposed Final Audit Report - Due Date

As of 1/31/2018

(Confidential and Sensitive)

26 Open Audits

Legend

IAR	Interim Audit Report
PAR	Preliminary Audit Report
DFAR	Draft Final Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened From: 10/1/2015 To: 9/30/2018

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
Oct-2015	757	Friends of Clyde Holloway for Congress Gulliot, Felix	\$0.00	10/19/2015	\$0.00	10/19/2015	\$0.00	Attend FEC seminar	10/19/2016	01/20/2016
	759	All Citizens for Mississippi Vann, Jacqueline	\$2,000.00	10/27/2016	\$2,000.00	03/27/2017	\$0.00	Attend FEC seminar	10/27/2016	03/27/2017
	765	Texans for a Conservative Majority Cutriel, Randy	\$8,150.00	11/21/2015	\$8,150.00	11/02/2015	\$0.00	Conduct & certify internal audit/reconciliation Conduct internal education program for employees or staff	11/21/2016 11/21/2015	10/24/2016 12/15/2015
Sub-Total : Oct-2015			\$8,150.00		\$8,150.00		\$0.00			
Nov-2015	767	Joe Carr for Senate Schott, Nate	\$2,250.00	12/18/2015	\$2,250.00	12/17/2015	\$0.00	Committee will file for termination	01/17/2016	08/16/2016
	769	Adkins, Mary Rose National Rifle Association (NRA) of America Political Victory Fund Adkins, Mary Rose National Rifle Association (NRA) of America Political Victory Fund	\$2,750.00	12/02/2015	\$2,750.00	11/19/2015	\$0.00	Conduct & certify internal audit/reconciliation	11/02/2016 11/02/2017	11/14/2016 11/01/2017
Sub-Total : Nov-2015			\$5,000.00		\$5,000.00		\$0.00			
Dec-2015	778	Ohio State Central & Executive Committee (Republican)	\$3,000.00	01/18/2016	\$3,000.00	01/15/2016	\$0.00	Attend FEC seminar	12/18/2016	11/14/2016

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
		Armstrong, Maria						Attend FEC seminar Develop a FEC Compliance Manual	12/18/2016 03/18/2016	11/14/2016 02/17/2016
Sub-Total : Dec-2015			\$3,000.00		\$3,000.00		\$0.00			
Jan-2016	775	May, Jennifer Marjorie 2014	\$0.00	05/24/2016				Committee will file for termination		
	777	Massachusetts Republican Party Anderson, Brent	\$4,500.00	02/07/2016	\$4,500.00	02/05/2016	\$0.00	Conduct & certify internal audit/reconciliation	02/08/2017	06/03/2016
Sub-Total : Jan-2016			\$4,500.00		\$4,500.00		\$0.00			
Feb-2016	772	Lisker, Lisa Newt 2012	\$0.00	08/01/2016				Committee will file for termination	08/01/2016	08/01/2016
	781	Sharon Sund for Congress Roberson, Eugene	\$0.00	05/24/2016				File amended reports Participate in conference call on requirements of FECA	03/28/2016 03/10/2016	06/30/2016 06/30/2016
	782	VANILA SINGH FOR CONGRESS 2014	\$2,300.00	04/19/2016	\$2,300.00	04/08/2016	\$0.00	Committee will file for termination	07/19/2016	03/07/2016
Sub-Total : Feb-2016			\$2,300.00		\$2,300.00		\$0.00			
Mar-2016	760	Dewhurst for Texas	\$0.00	03/02/2017		03/02/2017		Committee will file for termination	03/02/2017	01/05/2017
	764	Dewhurst for Texas	\$0.00	03/02/2017		03/02/2017		Committee will file for termination	03/02/2017	01/05/2017
	784	McConnell Senate Committee '14 McConnell Senate Committee '14	\$0.00	05/24/2016				Other	04/25/2016	04/29/2016
	785	Lisker, Lisa House Conservatives Fund	\$0.00	05/24/2016				Develop and enforce internal controls File amended reports	04/21/2016 03/21/2017	03/22/2016 04/27/2017
	786	David Vitter for U.S. Senate	\$0.00	05/24/2016				Other	03/23/2017	03/01/2017

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
		David Vitter for U.S. Senate David Vitter for U.S. Senate						Other	04/25/2016	04/01/2016
Sub-Total : Mar-2016			\$0.00							
Apr-2016	788	Conservative Campaign Committee	\$4,750.00	10/19/2016	\$4,750.00	11/21/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	04/09/2017 02/18/2016	01/17/2018 09/07/2016
	789	Democratic Party Of Hawaii Keng Kee, Florence L.	\$6,375.00	10/28/2016	\$6,375.00	11/08/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	04/28/2017 07/28/2017	05/19/2017 07/28/2017
Sub-Total : Apr-2016			\$11,125.00		\$11,125.00		\$0.00			
May-2016	792	Oakland County Democratic Party	\$10,000.00	11/18/2016	\$10,000.00	09/19/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	05/19/2017 08/13/2016	05/17/2017 09/01/2016
Sub-Total : May-2016			\$10,000.00		\$10,000.00		\$0.00			
Jun-2016	793	Ohio Democratic Party Alberty, Fran	\$3,850.00	07/02/2016	\$3,850.00	07/01/2016	\$0.00	Attend FEC seminar	06/02/2017	05/18/2017
Sub-Total : Jun-2016			\$3,850.00		\$3,850.00		\$0.00			
Jul-2016	787	Mackenzie, Scott B Conservative Majority Fund	\$3,500.00	08/11/2016	\$3,500.00	07/26/2016	\$0.00	Attend FEC seminar File amended reports	07/12/2017 08/11/2016	
	799	Utah State Democrat Committee-Federal Corroon, Peter Utah State Democrat Committee Federal Corroon, Peter	\$1,550.00	10/10/2016	\$1,550.00	08/24/2016	\$0.00	Other	08/10/2016	08/10/2016
Sub-Total : Jul-2016			\$5,050.00		\$5,050.00		\$0.00			

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
Aug-2016	795	Cotton for Senate	\$2,000.00	09/10/2016	\$2,000.00	08/24/2016	\$0.00	Develop a FEC Compliance Manual	11/10/2016	11/08/2016
Sub-Total : Aug-2016			\$2,000.00		\$2,000.00		\$0.00			
Sep-2016	802	Right to Rise PAC, Inc.	\$2,400.00	10/07/2016	\$2,400.00	07/08/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	09/08/2017 12/08/2016	06/22/2016 07/08/2016
	807	Vreuter, Dutham Keep the Promise PAC	\$1,425.00	10/22/2016	\$1,425.00	11/01/2016	\$0.00	Committee will file for termination	12/21/2016	02/03/2017
Sub-Total : Sep-2016			\$3,825.00		\$3,825.00		\$0.00			
Oct-2016	791	Oklahoma Leadership Council Hodges, Peter Leo	\$8,750.00	10/12/2017	\$8,750.00	10/10/2017	\$0.00	Attend FEC seminar	04/12/2018	08/30/2017
	800	The 2016 Draft Committee (aka National Draft Ben Carson for President Committee)	\$11,000.00	12/14/2016	\$11,000.00	11/01/2016	\$0.00	Committee will file for termination	04/14/2017	01/12/2017
	806	Marston, Chris Rodney for Congress	\$3,400.00	11/24/2016	\$3,400.00	03/01/2017	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	10/24/2017 02/24/2017	09/28/2016 02/22/2017
Sub-Total : Oct-2016			\$23,150.00		\$23,150.00		\$0.00			
Nov-2016	803	Majority Committee PAC--MC PAC Thomson, Jill	\$1,575.00	12/14/2016	\$1,575.00	11/23/2016	\$0.00	Attend FEC seminar	11/14/2017	12/06/2017
								Other	12/14/2016	01/25/2017
Sub-Total : Nov-2016			\$1,575.00		\$1,575.00		\$0.00			
Dec-2016	805	Reiff, Nell P., Esq VoteVets.org Action Fund	\$2,000.00	01/04/2017	\$2,000.00	12/28/2016	\$0.00	Attend FEC seminar	12/07/2017	
								Develop a FEC Compliance Manual	03/05/2017	01/24/2018
Sub-Total : Dec-2016			\$2,000.00		\$2,000.00		\$0.00			
Jan-2017	796	Lowey, Keith D.	\$2,280.00	02/19/2017	\$2,280.00	01/06/2017	\$0.00	Committee will file for termination	04/19/2017	01/31/2017

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
		Duckworth for Congress						Committee will file for termination	04/19/2017	01/31/2017
	812	Foundation for a Greater America, Inc. Ault, Anastasia	\$3,750.00	05/19/2017				Committee will file for termination	07/19/2017	
Sub-Total : Jan-2017			\$6,030.00		\$2,280.00		\$0.00			
Feb-2017	808	Southwest Regional Council of Carpenters Legislative Improvement Cmte United Brotherhood of Carpenters & Joiners of America (SW CLIC) Thornhill, Randy	\$2,500.00	03/07/2017	\$2,500.00	03/07/2017	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	02/07/2018 05/08/2017	03/29/2017 05/08/2017
Sub-Total : Feb-2017			\$2,500.00		\$2,500.00		\$0.00			
Mar-2017	804	Americans for a Conservative Direction	\$2,550.00	04/17/2017	\$2,550.00	04/17/2017	\$0.00	None		
	813	Scott Rigell for Congress Wood, Joseph B.	\$5,600.00	04/22/2017	\$5,600.00	04/18/2017	\$0.00	Committee will file for termination Other	05/22/2017 04/22/2017	05/15/2017 04/21/2017
Sub-Total : Mar-2017			\$8,150.00		\$8,150.00		\$0.00			
Apr-2017	810	Independence USA PAC Gubelli, Diane	\$3,300.00	05/05/2017	\$3,300.00	04/24/2017	\$0.00	Attend FEC seminar Other	04/05/2018 05/05/2017	 05/30/2017
Sub-Total : Apr-2017			\$3,300.00		\$3,300.00		\$0.00			
May-2017	818	Hundley, Seymour Kumar for Congress	\$8,300.00	06/09/2017	\$8,300.00	04/24/2017	\$0.00	Develop a FEC Compliance Manual	08/08/2017	07/11/2017
	819	National Right to Life Victory Fund Cockfield, Wayne	\$3,200.00	06/07/2017	\$3,200.00	04/27/2017	\$0.00	Conduct internal education program for employees or staff	06/09/2017	06/09/2017

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
Sub-Total : May-2017			\$11,500.00		\$11,500.00		\$0.00			
Jul-2017	820	Working Families Party / Independent Expenditure Committee Boland, Mike	\$3,350.00	08/05/2017				Attend FEC seminar Develop a FEC Compliance Manual	07/06/2018 09/04/2017	
Sub-Total : Jul-2017			\$3,350.00							
Sep-2017	824	Driscoll, Timothy J. Intl Union of Bricklayers and Allied Craftworkers PAC	\$1,500.00	10/07/2017	\$1,500.00	09/26/2017	\$0.00	Attend FEC seminar	09/08/2018	
Sub-Total : Sep-2017			\$1,500.00		\$1,500.00		\$0.00			
Oct-2017	811	Nix, Treasurer ADR 714 Lane Star Committee	\$250.00	11/04/2017	\$250.00	01/23/2018	\$0.00	None		
Sub-Total : Oct-2017			\$250.00		\$250.00		\$0.00			
Nov-2017	828	National Right To Life Political Action Committee Cockfield, Wayne	\$3,375.00	12/06/2017	\$3,375.00	12/06/2017	\$0.00	Conduct internal education program for employees or staff Develop a FEC Compliance Manual	03/06/2018 03/06/2018	
	829	Adam Clayton Powell for Congress Weinstein, Mark J.	\$2,550.00	12/06/2017				File amended reports File future reports timely	12/06/2017	
	830	Orentlicher for Congress Gabovitch, David S.	\$2,150.00	12/17/2017	\$2,150.00	12/12/2017	\$0.00	Meet with RAD staff	12/17/2017	01/09/2018
	833	National Right to Life Victory Fund Cockfield, Wayne	\$6,000.00	12/06/2017	\$6,000.00	12/06/2017	\$0.00	Conduct internal education program for employees or staff Develop a FEC Compliance Manual	03/06/2018 03/06/2018	

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
Sub-Total : Nov-2017			\$14,075.00		\$11,525.00		\$0.00			
Dec-2017	831	Combs, Bill 21st Century Democrats	\$5,850.00	01/03/2018	\$5,850.00	01/02/2018	\$0.00	Develop a FEC Compliance Manual	03/04/2018	
	832	Democratic Party Of New Mexico Lima, Robert	\$8,000.00	01/12/2018	\$8,600.00	11/14/2017	\$0.00	Attend FEC seminar	12/13/2018	12/01/2017
	836	Lisker, Lisa Arizona Grassroots Action PAC	\$2,250.00	01/08/2018	\$2,250.00	01/24/2018	\$0.00	Develop a FEC Compliance Manual	03/07/2018	
Sub-Total : Dec-2017			\$16,700.00		\$16,700.00		\$0.00			
Jan-2018	837	CITIZENS UNITED SUPER PAC LLC Catts, Lauren	\$5,850.00	01/24/2018				Other	02/22/2018	
Sub-Total : Jan-2018			\$5,850.00							
Grand Total :			\$158,730.00		\$143,230.00		\$0.00			



AF Performance Goals

Print Date: January 31, 2018

Selected Parameters:

Office: Both

Start Date: 10/01/2017

End Date: 12/31/2017

*Exception: YES



AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date
Processed					
2017	M10	P_UNAUTH	N	10/20/2017	11/27/2017
2017	Q3	H_S_P	N	10/15/2017	11/27/2017
2017	M9	P_UNAUTH	N	09/20/2017	11/06/2017
2017	M8	P_UNAUTH	N	08/20/2017	10/02/2017

Total AF Reports Processed 4

Average Processing Days 42.75

Percentage to Goal 100.00%

Processed - No committees

					Action Date
2017	12SG	AUTH	Y	10/26/2017	12/14/2017
2017	M10	P_UNAUTH	Y	10/20/2017	11/20/2017
2017	Q3	H_S_P	Y	10/15/2017	12/05/2017
2017	12SPR	AUTH	Y	09/14/2017	11/06/2017

Total AF Reports Processed-No Committees 4

Average Processing Days 46.00

Percentage to Goal 100.00%



AF Performance Goals

(Confidential and Sensitive)

Total AF Reports	8
Average Processing Days	44.38

(b) (7)(E)

Percentage to Goal	100.00%
--------------------	---------

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters
RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2017	Q1	3328	C00476457	09/05/2017	10/25/2017	50	Y
2016	48H	3336	C00607782	10/31/2017	12/28/2017	58	Y
2017	MY	3343	C00630012	10/24/2017	12/20/2017	57	Y
2017	MY	3344	C00623355	10/30/2017	12/14/2017	45	Y

Total Challenges Processed 4

Average Processing Days 52.50

Total Reports Processed within 60 Days 4

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2018 APR 30 AM 10:52

SENSITIVE

April 30, 2018

MEMORANDUM

AGENDA DOCUMENT NO. X18-21
AGENDA ITEM
For the meeting of May 8, 2018

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista Roche *KJR*
Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Thomas Hintermister *TH*
Assistant Staff Director
Audit Division

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2018 – 2nd Quarter Highlights (1/1/18 – 3/31/18) & FY Statistical Overview

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the second quarter (1/1/18 – 3/31/18) and 2018 fiscal year statistical overview. The intent of this document is to proactively provide an update of the workload and achieved results of the Office of Compliance on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during an upcoming Executive Session.

The attached **Appendix A** provides the Commission with second quarter highlights for each office and also a statistical overview of FY 2018 results and progression towards meeting the 2014-2019 Strategic Performance Goals adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled 'Proposed Final Audit Report – Due Date' which highlights the report manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2018 statistics for meeting strategic performance goals related to the Administrative Fine Program. Please note, additional audit reports are also available within the (b) (7)(E)

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the overview.

Alternative Dispute Resolution Office (ADRO)

In the second quarter of FY 2018, the ADRO received 7 cases (4 from RAD, 1 from Audit, and 2 from OGC). During this time period, the ADRO closed a total of 15 cases, 14 with approved negotiated settlements and 1 case in which the Commission approved dismissal. In the second quarter of FY 2018, the Commission assessed \$83,840 in civil penalties through approved negotiated settlements, and the office collected \$27,577.

(b) (7)(E)

The ADRO continued to work with the Office of Chief Information Officer (OCIO) regarding the upgrade of the case management system (Law Manager). Work was completed on integrating automated mail merge technology with the system during the previous quarter and minor adjustments to documents were made during this quarter.

Administrative Fine Program (Office of Administrative Review)

During the second quarter of FY 2018, the Commission processed 2 Reason to Believe (RTB) findings. OAR received 1 challenge and processed 1 Reviewing Officer Recommendations (RORs). The Commission reviewed final determination recommendations in 9 cases, and made a final determination that the respondents in these cases violated 52 U.S.C. § 30104(a) and assessed penalties totaling \$57,319. The Commission also collected \$44,937.23 in fine payments and prepared 21 cases for public release.

(b) (7)(E)

(b) (7)(E)

Additionally, the Office of Administrative Review (OAR) forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

During the second quarter, the Reviewing Officer began working with Pay.gov and OGC to expand the electronic payment option to those respondents involved in OGC enforcement matters. Consistent with what is already available to respondents in AF and ADR matters, the new OGC Electronic Payment System will give respondents the option to pay a civil money penalty by debit or credit card, or automated clearing house (ACH) withdrawal on Pay.gov. The new service is currently in the testing phase and is scheduled to deploy in the third quarter.

Audit Division

During the second quarter of FY 2018, the Audit Division processed the following audit reports:

	Audit Report Stage	Number of Reports
Released to Public	Final Audit Report	2
Sent to the Committee	Interim Audit Report	5
	Draft Final Audit Report	0
Circulated to the Commission	Interim Audit Report	3
	Audit Division Recommendation Memorandum	1
	Proposed Final Audit Report	2
Forwarded to OGC	Interim Audit Report	5
	Draft Final Audit Report	0
	Audit Division Recommendation Memorandum	1
	Total # of Audit Reports	19

The Audit Division has a total of 23 open audits. One Audit Hearing was held in February (McSally for Congress).

The Commission approved a total of eight Unauthorized Audits for the 2016 cycle. Four of these audits have started fieldwork, one is awaiting the committee response to the exit conference and for one, a Final audit report has been approved. The remaining two audits are in the pre-audit phase with fieldwork planned to commence in May and June.

With respect to the Presidential Election Campaign Fund (PECF), the Audit Division continues to post the pertinent portion of the monthly PECF reports to the Commission website. Further, in preparation for the annual budgetary calculations for the PECF's fiscal years 2019 through 2029, the Audit Division reached out to its liaison at the Bureau of Labor Statistics and requested certain statistical information pertaining to the Consumer Price Index. Finally, to account for the regulatory changes applicable to public financing, the Audit Division proposed edits to the document 'Proposed Revisions to FEC Directive on Convention and General Election Certification Procedures –LRA 1052'. This document was circulated on June 28, 2017 to the Commission and is awaiting Commission approval.

Audit staff continues to collaborate with OCIO on the testing and design of the Audit Report Search System (ARSS) for the FEC website. Additionally, a joint task force has been created with the Office of Compliance Advice in OGC to develop initiatives in the processing of audits. The Audit Division is currently working with OHR to update auditor performance standards. Audit currently is down eight FTE's, including a manager position which was vacated on February 2, 2018.

Reports Analysis Division (RAD)

During the second quarter of FY 2018, RAD committed significant resources to preparing the division for the building move. RAD staff worked with the Commission Secretary and other FEC personnel to update RAD's records schedules and to gain permission from the National Archives (NARA) to consider RAD's paper records media neutral, due to the availability of electronic versions. This allowed RAD to dispose of the paper reports/documents from the 2013-2014 election cycle prior to the move and will continue to save the FEC both time and money after each election cycle, no longer requiring documents to be packed up in boxes and archived for a fee.

RAD staff reviewed a total of 17,294 documents totaling 10,645,448 pages during the second quarter of FY 2018 and 93% of the reports were reviewed within 90 days of receipt for the current election cycle. RAD generated and sent 2,109 letters to the filing community during the second quarter and for FY 2018, 92% of RFAs were sent within 40 days of the report review date. Also during the second quarter, RAD generated 16 referrals (12 OGC, 4 ADRO) and sent 1,434 non-filer notices where the Commission approved recommendations to publish 11 authorized committees for failure to timely file an election-sensitive report. Finally, during the second quarter, the Reports Processing Branch coded 10,772,849 transactions and 2,275 documents and processed 194,069 pages from 2,214 documents in the Paper Automation system.

RAD filled an Assistant Branch Chief position on the Authorized Branch, one (1) Senior Campaign Finance & Reviewing Analyst (GS-12) promotion position, and welcomed four (4) Campaign Finance Analysts (CFA) during the second quarter. We recently received approval to back fill a Data Disclosure Assistant position, three (3) additional GS-7 CFA positions, and a GS-12 promotion and will move to fill these positions as quickly as possible.

Finally, RAD collaborated with OCIO on the development and implementation of a quality of review tracking tool for managers designed to ensure the consistent review of reports and to identify areas where additional training may be needed. In addition, RAD implemented an automated system for identifying and contacting committees eligible for Administrative Termination. This system will save time and money, no longer requiring the process to be conducted manually or the sending of letters via USPS.

Attachments

Appendix A, FY 2018 Highlights and FY Overview for Office of Compliance Goals

Appendix B, Open Audits Report
Appendix C, Proposed Final Audit Report – Due Date
Appendix D, ADRO Civil Penalty Report
Appendix E, AF Performance Goals Report

Status of Compliance

FY 2018
(10/1/2017 - 3/31/2018)

Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's **access** to information about how campaign funds are raised and spent

Performance Goals	FY 15	FY 16	FY 17	FY 18 (3/31/18)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	98.9%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2018 Performance Goals	Status as of 3/31/18
RAD staff collaborated with OCIO on the creation of reporting examples for the FEC website	<p>Candidate reporting examples posted – October 2017</p> <p>First set of SSF and Nonconnected reporting examples posted – March 2018</p> <p>Party reporting examples are being worked on now</p>
RAD staff collaborated with Information Division to present workshops in FEC conferences and webinars	<p>Candidate, PAC, Party & FECfile webinars – January 2018</p> <p>FEC Scottsdale, AZ conference – February 2018</p>
RAD staff proposed revisions to Standard 26 of the 2017-2018 RAD Review & Referral Procedures to address dormant Title 52 authorized committees of former federal candidates and officeholders	The Commission approved the revisions with edits on 4/24/18. A Record Article was posted on the FEC website summarizing the new review and providing guidance on permissible uses of funds.

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 2: Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs

Performance Goals	FY 13	FY 14	FY 15	FY 16	FY 17	FY 18 (3/31/18)
RAD to review 75% of reports within 90 days of receipt	72.6%	85.4%	79.3%	92.9%	76.6%	92%
RAD to send 75% of RFAs within 40 days of report review	72%	84%	92%	92%	88%	90%
(b) (7)(E)	91.1%	96.8%	93.5%	100%	96.2%	100%
(b) (7)(E)	38%	93%	43%	56%	25%	0%
OAR to circulate 60% of Reviewing Officer Recommendations within 60 days	93%	100%	97%	81.8%	96.67%	100%
(b) (7)(E)	100%	95%	100%	100%	100%	88%

Strategic Objective 4: Foster a Culture of High Performance

Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 13	FY 14	FY 15	FY 16	FY 17	FY 18 (3/31/18)
RAD	Documents/ Transactions Coded	N/A	N/A	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	3,802/ 15,743,768
	Documents/Pages Processed in Paper Automation System	N/A	N/A	N/A	N/A	8,139/ 684,747	3,664/ 348,826
	Documents/Pages Reviewed	87,190/ 10,490,683	68,282/ 9,211,502	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	31,613/ 23,883,200
	Letters sent	15,543	10,220	13,433	13,253	14,796	5,090
	Telephone calls handled	14,254	10,673	11,822	12,362	11,634	5,784
	Referrals	88	59	91	43	95	29
	AF Cases RTB/FD	194/184	70/55	191/159	83/33	163/168	8/18
Audit	(b) (7)(E)						
ADRO							
OAR	Cases Received	26	6	35	12	29	5
	Cases Closed (FD)	31	5	32	11	32	7



Open Audits

As of 4/30/2018
(Confidential and Sensitive)

			<u>Date of Last Action</u>	<u>Audit Manager</u>	<u>Report Track</u>
Pre-Audit					
2016	THE 2016 COMMITTEE	C00569905	11/29/2017	Favin	B
2016	MISSISSIPPI REPUBLICAN PARTY	C00084388	01/26/2018	Pacious	B
					Total - 2
Fieldwork					
2016	NEW JERSEY REPUBLICAN STATE COMMITTEE	C00164418	03/27/2018	Morcomb	B
2016	OKLAHOMA DEMOCRATIC PARTY	C00190934	04/16/2018	Morcomb	B
2016	SOUTH DAKOTA DEMOCRATIC PARTY	C00160937	04/24/2018	Favin	B
2016	TENNESSEE DEMOCRATIC PARTY	C00167346	04/30/2018	Burgess	B
					Total - 4
10 Day Response Period to the Exit Conference					
2016	AMBULATORY SURGERY CENTER ASSOCIATION PAC (ASCAPAC)	C00424788	04/18/2018	Pacious	B
					Total - 1
Interim/Preliminary Report Writing					
2016	HALL FOR CONGRESS	C00497859	12/12/2017	Burgess	B
2016	MARSHA BLACKBURN FOR CONGRESS, INC.	C00376939	01/25/2018	Morcomb	B
2016	TONY CARDENAS FOR CONGRESS	C00498873	03/16/2018	Smith	B
					Total - 3
Interim/Preliminary Audit Report Committee Response Period					
2016	BRIAN HIGGINS FOR CONGRESS	C00401034	03/23/2018	Smith	B
2016	FRIENDS OF ERIK PAULSEN	C00439661	04/17/2018	Pacious	B
					Total - 2
Draft Final Audit Report Writing					
2014	PERDUE FOR SENATE	C00547570	11/29/2017	Smith	B
2014	ARIZONA REPUBLICAN PARTY	C00008227	04/02/2018	Favin	B
2016	O'MALLEY FOR PRESIDENT	C00578658	04/17/2018	Pacious	B
					Total - 3
Draft Final Audit Report Committee Response Period					
2014	DEMOCRATIC PARTY OF ARKANSAS	C00024372	04/24/2018	Morcomb	B
2014	DEMOCRATIC PARTY OF SOUTH CAROLINA	C00007658	04/25/2018	Burgess	B
2016	KELLY FOR CONGRESS	C00573980	04/25/2018	Morcomb	B
2016	MIKE BISHOP FOR CONGRESS	C00561001	04/26/2018	Favin	B
					Total - 4
Audit Division Recommendation Memorandum Writing					
2014	MICHIGAN DEMOCRATIC STATE CENTRAL COMMITTEE	C00031054	04/18/2018	Smith	B
					Total - 1



Open Audits

As of 4/30/2018
(Confidential and Sensitive)

		<u>Date of</u>		<u>Audit</u>	<u>Report</u>	
		<u>Last Action</u>		<u>Manager</u>	<u>Track</u>	
Proposed Final Audit Report Writing						
2014	MCSALLY FOR CONGRESS	C00512236		04/26/2018	Pacious	B
					Total - 1	
Audits in OGC						
2016	JILL STEIN FOR PRESIDENT	C00581199	PAR	03/06/2018	Burgess	B
2014	MASSACHUSETTS DEMOCRATIC STATE CMTE - FED FUNDS ACCT	C00089243	IAR	04/10/2018	Smith	B
					Total - 2	

23 Open Audits

Legend

Track A	Audits with <u>no</u> unresolved legal issues
Track B	State/Local Party audits with findings PAC audits with unresolved legal issues Authorized audits with unresolved legal issues
Track C	Audits with <u>no</u> findings
IAR	Interim Audit Report
PAR	Preliminary Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report
Text	If text is red, the report has not been sent to OGC for a legal analysis



Open Audits

As of 4/30/2018
(Confidential and Sensitive)

Audit Caseload

<u>Audit Manager</u>	<u>Number of Audits</u>	<u>Percent of Total Audits</u> ¹
Burgess	4	17%
Favin	4	17%
Morcomb	5	22%
Pacious	5	22%
Smith	5	22%
Totals	23	100%

¹ May not total 100% due to rounding



Open Audits

As of 4/30/2018
(Confidential and Sensitive)

Comments

2014

Arizona Republican Party
(b) (5)

Democratic Party of Arkansas
(b) (5)

Democratic Party of South Carolina
(b) (5)

Massachusetts Democratic State Committee
(b) (5)

McSally for Congress
(b) (5)

Michigan Democratic State Central Committee
(b) (5)

Perdue for Senate
(b) (5)

2016

Ambulatory Surgery Center Assoc. PAC (ASCAPAC)
(b) (5)

Brian Higgins for Congress
(b) (5)

Friends of Erik Paulsen
(b) (5)

Hall for Congress
(b) (5)

Jill Stein for President
(b) (5)

Kelly for Congress
(b) (5)

Marsha Blackburn for Congress, Inc.
(b) (5)

Mike Bishop for Congress
(b) (5)

Mississippi Republican Party
(b) (5)

New Jersey Republican State Committee
(b) (5)



Open Audits

As of 4/30/2018
(Confidential and Sensitive)

Oklahoma Democratic Party
(b) (5)

O'Malley for President
(b) (5)

South Dakota Democratic Party
(b) (5)

Tennessee Democratic Party
(b) (5)

The 2016 Committee
(b) (5)

Tony Cardenas for Congress
(b) (5)



Proposed Final Audit Report - Due Date

As of 4/30/2018

(Confidential and Sensitive)

	<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2014 PERDUE FOR SENATE	Smith	DFAR	Report Writing	04/24/2015
2014 MCSALLY FOR CONGRESS	Pacious	PFAR	Report Writing	04/24/2015
2014 DEMOCRATIC PARTY OF SOUTH CAROLINA	Burgess	DFAR	Committee Response Period	11/18/2015
2014 DEMOCRATIC PARTY OF ARKANSAS	Lmorcomb	DFAR	Committee Response Period	11/18/2015
2014 ARIZONA REPUBLICAN PARTY	Favin	DFAR	Report Writing	11/18/2015
2014 MASSACHUSETTS DEMOCRATIC STATE CMTE - FED FUNDS ACCT	Smith	IAR	OGC Reviewing	11/18/2015
2014 MICHIGAN DEMOCRATIC STATE CENTRAL COMMITTEE	Smith	ADRM	Memorandum Writing	11/18/2015
2016 O'MALLEY FOR PRESIDENT	Pacious	DFAR	Report Writing	11/30/2016
2016 KELLY FOR CONGRESS	Lmorcomb	DFAR	Committee Response Period	05/03/2017
2016 JILL STEIN FOR PRESIDENT	Burgess	PAR	OGC Reviewing	11/30/2016
2016 HALL FOR CONGRESS	Burgess	IAR	Report Writing	05/03/2017
2016 FRIENDS OF ERIK PAULSEN	Pacious	IAR	Committee Response Period	05/03/2017
2016 BRIAN HIGGINS FOR CONGRESS	Smith	IAR	Committee Response Period	05/03/2017
2016 MARSHA BLACKBURN FOR CONGRESS, INC.	Lmorcomb	IAR	Report Writing	05/03/2017
2016 TONY CARDENAS FOR CONGRESS	Smith	IAR	Report Writing	05/03/2017
2016 MIKE BISHOP FOR CONGRESS	Favin	DFAR	Committee Response Period	05/03/2017
2016 AMBULATORY SURGERY CENTER ASSOCIATION PAC (ASCAPAC)	Pacious	IAR	10 Day Response Period to the Exit Conference	11/29/2017
2016 SOUTH DAKOTA DEMOCRATIC PARTY	Favin		Fieldwork	11/29/2017
2016 NEW JERSEY REPUBLICAN STATE COMMITTEE	Lmorcomb		Fieldwork	11/29/2017
2016 OKLAHOMA DEMOCRATIC PARTY	Lmorcomb		Fieldwork	11/29/2017
2016 MISSISSIPPI REPUBLICAN PARTY	Pacious		Pre-Audit	01/26/2018
2016 TENNESSEE DEMOCRATIC PARTY	Burgess		Pre-Audit	01/26/2018
2016 THE 2016 COMMITTEE	Favin		Pre-Audit	11/29/2017

(b) (7)(E)



Proposed Final Audit Report - Due Date

As of 4/30/2018

(Confidential and Sensitive)

23 Open Audits

Legend

IAR	Interim Audit Report
PAR	Preliminary Audit Report
DFAR	Draft Final Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year: 10/01/2016 To: 09/30/2018

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY -2017	791	Oklahoma Leadership Council Hodges, Peter Leo	\$8,750.00	10/12/2017	\$8,750.00	10/10/2017	\$0.00	Attend FEC seminar	04/12/2018	08/30/2017
	796	Lowey, Keith D Duckworth for Congress	\$2,280.00	02/19/2017	\$2,280.00	01/06/2017	\$0.00	Committee will file for termination	04/19/2017	01/31/2017
	800	The 2016 Draft Committee (f/k/a National Draft Ben Carson for President Committee)	\$11,000.00	12/14/2016	\$11,000.00	11/01/2016	\$0.00	Committee will file for termination	04/14/2017	01/12/2017
	803	Majority Committee PAC—MC PAC Thomson, Jill	\$1,575.00	12/14/2016	\$1,575.00	11/23/2016	\$0.00	Attend FEC seminar Other	11/14/2017 12/14/2016	12/06/2017 01/25/2017
	804	Americans for a Conservative Direction	\$2,550.00	04/17/2017	\$2,550.00	04/17/2017	\$0.00	None		
	805	Reiff, Neil P., Esq. VoteVets.org Action Fund	\$2,000.00	01/04/2017	\$2,000.00	12/28/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	12/07/2017 03/05/2017	02/22/2018 01/24/2018
	806	Marston, Chris Rodney for Congress	\$3,400.00	11/24/2016	\$3,400.00	03/01/2017	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	10/24/2017 02/24/2017	09/28/2016 02/22/2017
	808	Southwest Regional Council of Carpenters Legislative Improvement Cmte United Brotherhood of Carpenters & Joiners of America (SW CLIC)	\$2,500.00	03/07/2017	\$2,500.00	03/07/2017	\$0.00	Attend FEC seminar	02/07/2018	03/29/2017

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
		Thornhill, Randy						Attend FEC seminar	02/07/2018	03/29/2017
								Develop a FEC Compliance Manual	05/08/2017	05/09/2017
	810	Independence USA PAC Gubelli, Diane	\$3,300.00	05/05/2017	\$3,300.00	04/24/2017	\$0.00	Attend FEC seminar	04/05/2018	12/06/2017
								Other	06/05/2017	05/30/2017
	812	Foundation for a Greater America, Inc Ault, Anastasia	\$3,750.00	05/19/2017				Committee will file for termination	07/19/2017	
	813	Scott Rigell for Congress Wood, Joseph B.	\$5,600.00	04/22/2017	\$5,600.00	04/18/2017	\$0.00	Committee will file for termination	05/22/2017	05/15/2017
								Other	04/22/2017	04/21/2017
	818	Hundley, Seymour Kumar for Congress	\$8,300.00	06/09/2017	\$8,300.00	04/24/2017	\$0.00	Develop a FEC Compliance Manual	08/06/2017	07/11/2017
	819	National Right to Life Victory Fund Cockfield, Wayne	\$3,200.00	06/07/2017	\$3,200.00	04/27/2017	\$0.00	Conduct internal education program for employees or staff	06/09/2017	06/09/2017
	820	Working Families Party Independent Expenditure Committee Boland, Mike	\$3,350.00	08/05/2017	\$3,350.00	02/22/2018	\$0.00	Attend FEC seminar	07/06/2018	
								Develop a FEC Compliance Manual	09/04/2017	
	824	Driscoll, Timothy L. Int'l Union of Bricklayers and Allied Craftworkers PAC	\$1,500.00	10/07/2017	\$1,500.00	09/26/2017	\$0.00	Attend FEC seminar	09/08/2018	
Sub-Total : FY -2017			\$63,055.00		\$59,305.00		\$0.00			
FY -2018	811	No, Treasurer ADR 714 Lone Star Committee	\$250.00	11/04/2017	\$250.00	01/23/2018	\$0.00	None		

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	828	National Right To Life Political Action Committee Cockfield, Wayne	\$3,375.00	12/06/2017	\$3,375.00	12/06/2017	\$0.00	Conduct internal education program for employees or staff Develop a FEC Compliance Manual	03/06/2018 03/06/2018	03/06/2018 03/09/2018
	829	Adam Clayton Powell for Congress Weinstein, Mark J.	\$2,550.00	12/06/2017				File amended reports File future reports timely	12/06/2017	
	830	Orentlicher for Congress Gabovitch, David S.	\$2,150.00	12/17/2017	\$2,150.00	12/12/2017	\$0.00	Meet with RAD staff	12/17/2017	01/09/2018
	831	Combs, Bill 21st Century Democrats	\$5,850.00	01/03/2018	\$5,850.00	01/02/2018	\$0.00	Develop a FEC Compliance Manual	03/04/2018	
	832	Democratic Party Of New Mexico Lara, Robert	\$8,600.00	01/12/2018	\$8,600.00	11/14/2017	\$0.00	Attend FEC seminar	12/13/2018	12/01/2017
	833	National Right to Life Victory Fund Cockfield, Wayne	\$6,000.00	12/06/2017	\$6,000.00	12/06/2017	\$0.00	Conduct internal education program for employees or staff Develop a FEC Compliance Manual	03/06/2018 03/06/2018	03/06/2018 03/09/2018
	835	Planned Parenthood Action Fund Inc DBA Planned Parenthood Federal PAC Hubbard, Tshombe	\$2,600.00	02/16/2018	\$2,600.00	01/30/2018	\$0.00	Not Applicable		
	836	Lisker, Lisa Arizona Grassroots Action PAC	\$2,250.00	01/08/2018	\$2,250.00	01/24/2018	\$0.00	Develop a FEC Compliance Manual	03/07/2018	03/19/2018
	837	CITIZENS UNITED SUPER PAC LLC Catts, Lauren	\$5,850.00	01/24/2018	\$5,850.00	02/26/2018	\$0.00	Other	02/22/2018	
	838	Marston, Christopher M	\$8,340.00	04/05/2018	\$8,340.00	04/16/2018	\$0.00	Committee will file for termination		

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		Stutzman for Senate						Committee will file for termination		
	840	Democratic Party of Arkansas Vandiver, Dawne	\$10,400.00	02/20/2019				Attend FEC seminar File amended reports	02/20/2019 06/20/2018	
	841	Michigan Democratic State Central Committee O'Brien, Sandy	\$8,600.00	03/22/2018	\$8,600.00	04/11/2018	\$0.00	Attend FEC seminar File amended reports	02/20/2019 06/20/2018	
	842	Arizona Republican Party Lettieri, Bob	\$23,000.00	06/30/2018	\$15,000.00	04/27/2018	\$8,000.00	Attend FEC seminar File amended reports	02/20/2019 04/22/2018	
	843	Himpler, Bill American Financial Services Association PAC Himpler, Bill American Financial Services Association PAC	\$11,000.00	03/05/2018	\$11,000.00	01/03/2018	\$0.00	Conduct & certify internal audit/reconciliation	02/01/2019 02/01/2020	
	844	Jimmy Gomez for Congress Hodge, Mary	\$2,400.00	03/05/2018	\$2,400.00	02/28/2018	\$0.00	Develop a FEC Compliance Manual	05/01/2018	
	845	Planned Parenthood Advocates of Wisconsin Political Fund Barnes, Mel	\$5,850.00	03/07/2018	\$5,850.00	04/04/2018	\$0.00	Attend FEC seminar	03/07/2019	
	848	Spies, Charles R. Esq. Right to Rise USA	\$2,100.00	04/20/2018	\$2,100.00	04/11/2018	\$0.00	Attend FEC seminar	03/22/2019	
	849	Backer, Dan	\$3,700.00	04/20/2018	\$3,700.00	04/05/2018	\$0.00	File amended reports	07/20/2018	

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
		The Committee to Defend the President						File amended reports	07/20/2018	
	850	The Loose Group Wheichel, John E.	\$3,800.00	05/04/2018	\$3,800.00	04/10/2018	\$0.00	Attend FEC seminar	04/04/2019	
	854	Make America Great Again Caldwell, Leslie	\$3,375.00	05/11/2018				File amended reports	06/11/2018	
Sub-Total : FY -2018			\$122,040.00		\$97,715.00		\$8,000.00			
Grand Total :			\$185,095.00		\$157,020.00		\$8,000.00			



AF Performance Goals

Print Date: April 30, 2018

Selected Parameters:

Office: Both

Start Date: 10/01/2017

End Date: 03/31/2018

*Exception: YES



AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
Processed						
2017	YE	H_S_P_UNAUTH	N	01/31/2018	03/26/2018	
2017	M12	P_UNAUTH	N	12/20/2017	02/12/2018	
2017	M11	P_UNAUTH	N	11/20/2017	01/08/2018	
2017	M10	P_UNAUTH	N	10/20/2017	11/27/2017	
2017	Q3	H_S_P	N	10/15/2017	11/27/2017	
2017	M9	P_UNAUTH	N	09/20/2017	11/06/2017	
2017	M8	P_UNAUTH	N	08/20/2017	10/02/2017	
Total AF Reports Processed			7			
Average Processing Days			46.86			
(b) (7)(E)						
Percentage to Goal			100.00%			

Processed - No committees				Action Date		(b) (7)(E)
2017	30SG	AUTH	N	01/11/2018	03/07/2018	
2017	30SG	AUTH	N	12/07/2017	01/29/2018	
2017	12SG	AUTH	Y	11/30/2017	01/08/2018	
2017	12SG	AUTH	Y	10/26/2017	12/14/2017	
2017	M10	P_UNAUTH	Y	10/20/2017	11/20/2017	
2017	Q3	H_S_P	Y	10/15/2017	12/05/2017	
2017	12SPR	AUTH	Y	09/14/2017	11/06/2017	
Total AF Reports Processed-No Committees			7			
Average Processing Days			47.29			
(b) (7)(E)						
Percentage to Goal			100.00%			



AF Performance Goals

(Confidential and Sensitive)

Total AF Reports	14
Average Processing Days	47.07

(b) (7)(E)

Percentage to Goal	100.00%
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RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters
RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2017	Q1	3328	C00476457	09/05/2017	10/25/2017	50	Y
2016	48H	3336	C00607762	10/31/2017	12/28/2017	58	Y
2017	MY	3343	C00630012	10/24/2017	12/20/2017	57	Y
2017	MY	3344	C00623355	10/30/2017	12/14/2017	45	Y
2017	Q3	3350	C00440909	01/09/2018	03/07/2018	57	Y
2017	Q3	3351	C00640219	12/28/2017	02/21/2018	55	Y

Total Challenges Processed 6

Average Processing Days 53.67

Total Reports Processed within 60 Days 6

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2018 JUL 31 PM 3:35

SENSITIVE

July 31, 2018

MEMORANDUM

AGENDA DOCUMENT NO. **X18-40**

AGENDA ITEM

For meeting of **8-7-18**

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista Roche *KR*
Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Thomas Hintermister *TH*
Assistant Staff Director
Audit Division

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2018 – 3rd Quarter Highlights (4/1/18 – 6/30/18) & FY Statistical Overview

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the third quarter (4/1/18 – 6/30/18) and 2018 fiscal year statistical overview. The intent of this document is to provide an update of the workload and achieved results of the Office of Compliance on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during an upcoming Executive Session.

The attached **Appendix A** provides the Commission with third quarter highlights for each office and also a statistical overview of FY 2018 results and progression towards meeting the 2014-2019 Strategic Performance Goals adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled 'Proposed Final Audit Report – Due Date' which highlights the report manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2018 statistics for meeting strategic performance goals related to the Administrative Fine Program. Please note, additional audit materials are also available (b) (7)(E)

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the overview.

Alternative Dispute Resolution Office (ADRO)

In the third quarter of FY 2018, the ADRO received 11 cases (3 from RAD, 1 from Audit, 5 from OGC, and 1 from the Commission). During this time period, the ADRO closed a total of 8 cases, 5 with approved negotiated settlements, 2 matters transferred to OGC, and 1 case in which the Commission approved dismissal. In the third quarter of FY 2018, the Commission assessed \$25,075 in civil penalties through approved negotiated settlements, and the office collected \$69,915.

(b) (7)(E)

At the end of the third quarter, during the Executive Session on June 26th, the Commission authorized ADRO to make contact with 6 committees who were the subject of outstanding 2014 election cycle audits and offer an opportunity to participate in the ADR process and terminate the audit process. At the start of the fourth quarter, all 6 committees elected to participate in ADR. Per the direction of the Commission, the ADRO Director is working with staff from RAD, Audit, and Info to develop and implement a new educational program tailored to each committee.

ADRO received approval to post for a GS-13/14 ADR Specialist position to back fill the position previously occupied by the Director.

Administrative Fine Program (Office of Administrative Review)

During the third quarter of FY 2018, the Commission processed 46 Reason to Believe (RTB) findings. OAR received 1 challenge and processed 1 Reviewing Officer Recommendations (RORs). The Commission reviewed final determination recommendations in 2 cases, made a final determination that the respondents in 1 case violated 52 U.S.C. § 30104(a) and assessed no penalties. The Commission also collected \$2,420 in fine payments and prepared 1 case for public release.

(b) (7)(E)

(b) (7)(E)

Additionally, the Office of Administrative Review (OAR) forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix I).

During the third quarter, the Reviewing Officer worked with Pay.gov to successfully deploy the OGC Electronic Payment System and also provided assistance to ADRU to handle an increased caseload.

Audit Division

During the third quarter of FY 2018, the Audit Division processed the following audit reports:

	Audit Report Stage	Number of Reports
Released to Public	Final Audit Report	4
Sent to the Committee	Interim Audit Report	3
	Draft Final Audit Report	8
Circulated to the Commission	Interim Audit Report	5
	Audit Division Recommendation Memorandum	5
	Proposed Final Audit Report	4
Forwarded to OGC	Interim Audit Report	4
	Draft Final Audit Report	8
	Audit Division Recommendation Memorandum	5
Total # of Audit Reports		46

The Audit Division has a total of 14 open audits.

The Commission approved a total of eight Unauthorized Audits for the 2016 cycle. Five of these audits are in the fieldwork stage, one is awaiting the committee response to the exit conference, one is in OGC and one Final audit report has been approved.

With respect to the Presidential Election Campaign Fund (PECF), the Audit Division continues to post the pertinent portion of the monthly PECF reports to the Commission website. Further, in preparation for the annual budgetary calculations for the PECF's fiscal years 2019 through 2029, the Audit Division reached out to its liaison at the Bureau of Labor Statistics and requested statistical information pertaining to the Consumer Price Index. Finally, to account for the regulatory changes applicable to public financing, the Audit Division proposed edits to the document "Proposed Revisions to FEC Directive on Convention and General Election Certification Procedures (LRA 1052). This document was circulated on June 28, 2017 to the Commission and is awaiting Commission approval.

Audit staff continues to collaborate with OCIO on the testing and design of the Audit Report Search System (ARSS) for the FEC website. Additionally, a joint task force with the Office of Compliance Advice in OGC continues to meet to develop initiatives in the processing of audits. The division also continues to ensure that less tenured staff members are attending training and mentoring sessions so that skill gaps are minimized with the possible retirement of tenured auditors.

The Division has held numerous meetings with the Commission to review internal policies and procedures. (b) (5)

(b) (5) On June 26, 2018, the Commission approved that all open 2014 cases be transferred to the ADRO. This has allowed audit staff to focus exclusively on the 2016 audits to ensure that the strategic goal concerning turnaround time is achieved.

Reports Analysis Division (RAD)

During the third quarter of FY 2018, RAD collaborated with several other divisions within the agency on projects and initiatives. (b) (5)

(b) (5)

(b) (5)

In addition, RAD offered input and suggestions for revisions to the OGC Enforcement Priority Rating Sheet, and collaborated with the Information Division, Public Disclosure and OCIO on proposed revisions to Directive 1 to be circulated to the Commission for approval during the next quarter.

RAD staff reviewed a total of 24,231 documents totaling 14,255,582 pages during the third quarter of FY 2018 and 95% of the reports were reviewed within 90 days of receipt for the current election cycle. RAD generated and sent 5,298 letters to the filing community during the third quarter and for FY 2018, 86% of REAs were sent within 40 days of the report review date. Also during the third quarter, RAD generated 10 referrals (5 OGC, 3 ADRO, 1 AF, 1 Debt Settlement Plan) and sent 900 non-filer notices where the Commission approved recommendations to publish 35 authorized committees for failure to timely file an election-sensitive report. Finally, during the third quarter, the Reports Processing Branch coded 7,877,875 transactions and 2,829 documents and processed 279,177 pages from 2,749 documents in the Paper Automation system.

RAD filled one (1) Senior Campaign Finance & Reviewing Analyst (GS-12) promotion position and has received approval to back fill a Data Disclosure Assistant position and five (5) GS-7 Campaign Finance Analyst (CFA) positions. The vacancy announcement was recently posted for the CFA positions and we intend to fill these positions as quickly as possible after the announcement closes on August 9. In addition, we had two additional CFA resignations during the third quarter and are awaiting Commission approval to fill these positions. We would like to utilize the current posting to fill these positions if approval is granted.

Finally, RAD continued its collaborative relationship with OCIO during the third quarter. A RAD staff member served on the selection panel for the Electronic Filing redesign contract. In

addition, a RAD staff member served as a content manager for the FEC website and several staff members assisted with the development of reporting examples for the website.

Attachments

Appendix A, FY 2018 Highlights and FY Overview for Office of Compliance Goals

Appendix B, Open Audits Report

Appendix C, Proposed Final Audit Report – Due Date


Appendix D, ADR Civil Penalty Report

Appendix E, AF Performance Goals Report



Status of Compliance

FY 2018
(10/1/2017 - 6/30/2018)



Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 15	FY 16	FY 17	FY 18 (4/1/18)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	99.1%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2018 Performance Goals	Status 6/30/18
RAD staff collaborated with OGC and other agency offices on a scam PAC recommendation memo to the Commission	Memorandum proposing Commission actions to address "scam PACs" emailed to the Commission on May 22, 2018
RAD staff collaborated with Information Division to present workshops in FEC conferences and webinars	Reporting & FECfile webinars – April, May & June 2018
RAD staff met with OGC to provide input for revisions to the EPS rating process	Enforcement Priority System Rating Sheet is on the July 31, 2018 Executive Session Agenda for discussion.

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 2: Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs

Performance Goals	FY 13	FY 14	FY 15	FY 16	FY 17	FY 18
RAD to review 75% of reports within 90 days of receipt	72.6%	85.4%	79.3%	92.9%	76.6%	93.3%
RAD to send 75% of RFAs within 40 days of report review	72%	84%	92%	92%	88%	86%
(b) (7)(E)	91.1%	96.8%	93.5%	100%	96.2%	95.4%
(b) (7)(E)	38%	93%	43%	56%	25%	33%
QAR to circulate 60% of Reviewing Officer Recommendations within 60 days	93%	100%	97%	81.8%	96.67%	100%
(b) (7)(E)	100%	95%	100%	100%	100%	78%

Strategic Objective 4: Foster a Culture of High Performance

Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 13	FY 14	FY 15	FY 16	FY 17	FY 18 (6/30/18)
RAD	Documents/ Transactions Coded	N/A	N/A	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	6,628/ 23,621,643
	Documents/Pages Processed in Paper Automation System	N/A	N/A	N/A	N/A	8,139/ 684,747	6,413/ 628,003
	Documents/Pages Reviewed	87,190/ 10,490,683	68,282/ 9,211,502	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	55,835/ 38,138,700
	Letters sent	15,543	10,220	13,433	13,253	14,796	10,387
	Telephone calls handled	14,254	10,673	11,822	12,362	11,634	9,598
	Referrals	88	59	91	43	95	39
	AF Cases RTB/FD	194/184	70/55	191/159	83/33	163/168	54/18
Audit	(b) (7)(E)						
ADRO							
OAR	Cases Received	26	6	35	12	29	6
	Cases Closed (FD)	31	5	32	11	32	9

Appendix A



Open Audits

As of 7/31/2018
(Confidential and Sensitive)

				<u>Date of Last Action</u>	<u>Audit Manager</u>	<u>Report Track</u>
Fieldwork						
2016	OKLAHOMA DEMOCRATIC PARTY	C00190934		04/16/2018	Morcomb	B
2016	SOUTH DAKOTA DEMOCRATIC PARTY	C00160937		04/24/2018	Favin	B
2016	TENNESSEE DEMOCRATIC PARTY	C00167346		04/30/2018	Burgess	B
2016	THE 2016 COMMITTEE	C00569905		06/06/2018	Favin	B
2016	MISSISSIPPI REPUBLICAN PARTY	C00084368		06/18/2018	Pacious	B
Total - 5						
10 Day Response Period to the Exit Conference						
2016	NEW JERSEY REPUBLICAN STATE COMMITTEE	C00164418		07/19/2018	Morcomb	B
Total - 1						
Interim/Preliminary Report Writing						
2016	HALL FOR CONGRESS	C00497859		06/26/2018	Burgess	B
2016	TONY CARDENAS FOR CONGRESS	C00498873		06/26/2018	Smith	B
Total - 2						
Interim/Preliminary Audit Report Committee Response Period						
2016	MARSHA BLACKBURN FOR CONGRESS, INC.	C00376939		05/29/2018	Morcomb	B
2016	JILL STEIN FOR PRESIDENT	C00581199		07/10/2018	Burgess	B
Total - 2						
Draft Final Audit Report Committee Response Period						
2016	FRIENDS OF ERIK PAULSEN	C00439661		07/13/2018	Pacious	B
Total - 1						
Audits in OGC						
2016	AMBULATORY SURGERY CENTER ASSOCIATION PAC (ASCAPAC)	C00424788	IAR	07/30/2018	Pacious	B
Total - 1						
Audits with the Commission						
2016	BRIAN HIGGINS FOR CONGRESS	C00401034	ADRM	07/23/2018	Smith	B
2016	O'MALLEY FOR PRESIDENT	C00578658	PFAR	07/26/2018	Pacious	B
Total - 2						



Open Audits

As of 7/31/2018
(Confidential and Sensitive)

14 Open Audits

Legend

Track A	Audits with <u>no</u> unresolved legal issues
Track B	State/Local Party audits with findings PAC audits with unresolved legal issues Authorized audits with unresolved legal issues
Track C	Audits with <u>no</u> findings
IAR	Interim Audit Report
PAR	Preliminary Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report
Text	If text is red, the report has not been sent to OGC for a legal analysis



Open Audits
As of 7/31/2018
(Confidential and Sensitive)

Audit Caseload

<u>Audit Manager</u>	<u>Number of Audits</u>	<u>Percent of Total Audits</u> ¹
Burgess	3	21%
Favin	2	14%
Morcomb	3	21%
Pacious	4	29%
Smith	2	14%
Totals	14	100%

¹ May not total 100% due to rounding



Open Audits
As of 7/31/2018
(Confidential and Sensitive)

Comments

2016

Ambulatory Surgery Center Assoc. PAC (ASCAPAC)
(b) (5)

Brian Higgins for Congress
(b) (5)

Friends of Erik Paulsen
(b) (5)

Hall for Congress
(b) (5)

Jill Stein for President
(b) (5)

Marsha Blackburn for Congress, Inc.
(b) (5)

Mississippi Republican Party
(b) (5)

New Jersey Republican State Committee
(b) (5)

Oklahoma Democratic Party
(b) (5)

O'Malley for President
(b) (5)

South Dakota Democratic Party
(b) (5)

Tennessee Democratic Party
(b) (5)

The 2016 Committee
(b) (5)

Tony Cardenas for Congress
(b) (5)



Proposed Final Audit Report - Due Date

As of 7/31/2018

(Confidential and Sensitive)

	<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2016 O'MALLEY FOR PRESIDENT	Pacious	PFAR	Circulated to Commission	11/30/2016
2016 JILL STEIN FOR PRESIDENT	Burgess	PAR	Committee Response Period	11/30/2016
2016 HALL FOR CONGRESS	Burgess	IAR	Report Writing	05/03/2017
2016 FRIENDS OF ERIK PAULSEN	Pacious	DFAR	Committee Response Period	05/03/2017
2016 BRIAN HIGGINS FOR CONGRESS	Smith	ADRM	Circulated to Commission	05/03/2017
2016 MARSHA BLACKBURN FOR CONGRESS, INC.	Lmorcomb	IAR	Committee Response Period	05/03/2017
2016 TONY CARDENAS FOR CONGRESS	Smith	IAR	Report Writing	05/03/2017
2016 AMBULATORY SURGERY CENTER ASSOCIATION PAC (ASCAPAC)	Pacious	IAR	OGC Reviewing	11/29/2017
2016 NEW JERSEY REPUBLICAN STATE COMMITTEE	Lmorcomb	IAR	10 Day Response Period to the Exit Conference	11/29/2017
2016 MISSISSIPPI REPUBLICAN PARTY	Pacious		Fieldwork	01/26/2018
2016 SOUTH DAKOTA DEMOCRATIC PARTY	Favin		Fieldwork	11/29/2017
2016 TENNESSEE DEMOCRATIC PARTY	Burgess		Fieldwork	01/26/2018
2016 OKLAHOMA DEMOCRATIC PARTY	Lmorcomb		Fieldwork	11/29/2017
2016 THE 2016 COMMITTEE	Favin		Fieldwork	11/29/2017

(b) (7)(E)



Proposed Final Audit Report - Due Date

As of 7/31/2018

(Confidential and Sensitive)

14 Open Audits

Legend

IAR	Interim Audit Report
PAR	Preliminary Audit Report
DFAR	Draft Final Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year: 10/01/2015 To: 09/30/2018

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY -2016	757	Friends of Clyde Holloway for Congress Guillot, Felix	\$0.00	10/19/2015	\$0.00	10/19/2015	\$0.00	Attend FEC seminar	10/19/2016	01/20/2016
	759	All Citizens for Mississippi Vann, Jacqueline	\$2,000.00	10/27/2016	\$2,000.00	03/27/2017	\$0.00	Attend FEC seminar	10/27/2016	03/27/2017
	760	Dewhurst for Texas	\$0.00	03/02/2017		03/02/2017		Committee will file for termination	03/02/2017	01/06/2017
	764	Dewhurst for Texas	\$0.00	03/02/2017		03/02/2017		Committee will file for termination	03/02/2017	01/06/2017
	765	Texans for a Conservative Majority Cubriel, Randy	\$6,150.00	11/21/2015	\$6,150.00	11/02/2015	\$0.00	Conduct & certify internal audit/reconciliation Conduct internal education program for employees or staff	11/21/2016 11/21/2015	10/24/2016 12/15/2015
	767	Joe Carr for Senate Schott, Nate	\$2,250.00	12/18/2015	\$2,250.00	12/17/2015	\$0.00	Committee will file for termination	01/17/2016	08/16/2016
	769	Adkins, Mary Rose National Rifle Association (NRA) of America Political Victory Fund Adkins, Mary Rose National Rifle Association (NRA) of America Political Victory Fund	\$2,750.00	12/02/2015	\$2,750.00	11/19/2015	\$0.00	Conduct & certify internal audit/reconciliation	11/02/2016 11/02/2017	11/14/2016 11/01/2017
	772	Lisker, Lisa	\$0.00	08/01/2016				Committee will file for termination	08/01/2016	08/01/2016

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
		Newt 2012						Committee will file for termination	08/01/2016	08/01/2016
	775	May, Jennifer Marjorie 2014	\$0.00	05/24/2016				Committee will file for termination		
	777	Massachusetts Republican Party Anderson, Brent	\$4,500.00	02/07/2016	\$4,500.00	02/05/2016	\$0.00	Conduct & certify internal audit/reconciliation	02/08/2017	06/03/2016
	778	Ohio State Central & Executive Committee (Republican) Armstrong, Maria	\$3,000.00	01/18/2016	\$3,000.00	01/15/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	12/18/2016 03/18/2016	11/14/2016 02/17/2016
	781	Sharon Sund for Congress Roberson, Eugene	\$0.00	05/24/2016				File amended reports Participate in conference call on requirements of FECA	03/28/2016 03/10/2016	06/30/2016 06/30/2016
	782	VANILA SINGH FOR CONGRESS 2014	\$2,300.00	04/19/2016	\$2,300.00	04/08/2016	\$0.00	Committee will file for termination	07/19/2016	03/07/2016
	784	McConnell Senate Committee '14 McConnell Senate Committee '14	\$0.00	05/24/2016				Other	04/25/2016	04/29/2016
	785	Lisker, Lisa House Conservatives Fund	\$0.00	05/24/2016				Develop and enforce internal controls File amended reports	04/21/2016 03/21/2017	03/22/2016 04/27/2017
	786	David Vitter for U.S. Senate David Vitter for U.S. Senate David Vitter for U.S. Senate	\$0.00	05/24/2016				Other	03/23/2017 04/25/2016	03/01/2017 04/01/2016
	787	Mackenzie, Scott B. Conservative Majority Fund	\$3,500.00	08/11/2016	\$3,500.00	07/26/2016	\$0.00	Attend FEC seminar File amended reports	07/12/2017 08/11/2016	

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	788	Conservative Campaign Committee	\$4,750.00	10/19/2016	\$4,750.00	11/21/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	04/09/2017 07/19/2016	01/17/2018 09/07/2016
	789	Democratic Party Of Hawaii Kong Kee, Florence L.	\$6,375.00	10/28/2016	\$6,375.00	11/08/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	04/28/2017 07/28/2017	05/19/2017 07/28/2017
	792	Oakland County Democratic Party	\$10,000.00	11/18/2016	\$10,000.00	09/19/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	05/19/2017 08/19/2016	05/17/2017 09/01/2016
	793	Ohio Democratic Party Alberty, Fran	\$3,850.00	07/02/2016	\$3,850.00	07/01/2016	\$0.00	Attend FEC seminar	06/02/2017	05/18/2017
	798	Cotton for Senate, Inc.	\$2,000.00	09/10/2016	\$2,000.00	08/24/2016	\$0.00	Develop a FEC Compliance Manual	11/10/2016	11/08/2016
	799	Utah State Democrat Committee-Federal Corroon, Peter Utah State Democrat Committee-Federal Corroon, Peter	\$1,550.00	10/10/2016	\$1,550.00	08/24/2016	\$0.00	Other	08/10/2016	08/10/2016
	802	Right to Rise PAC, Inc.	\$2,400.00	10/07/2016	\$2,400.00	07/08/2016	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	09/08/2017 12/08/2016	06/22/2016 07/08/2016
	807	Voelter, Dathan Keep the Promise PAC	\$1,425.00	10/22/2016	\$1,425.00	11/01/2016	\$0.00	Committee will file for termination	12/21/2016	02/03/2017
	Sub-Total : FY -2016		\$58,800.00		\$58,800.00		\$0.00			
FY -2017	791	Oklahoma Leadership Council Hodges, Peter Leo	\$8,750.00	10/12/2017	\$8,750.00	10/10/2017	\$0.00	Attend FEC seminar	04/12/2018	08/30/2017
	796	Lowey, Keith D. Duckworth for Congress	\$2,280.00	02/19/2017	\$2,280.00	01/06/2017	\$0.00	Committee will file for termination	04/19/2017	01/31/2017

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	800	The 2016 Draft Committee (f/k/a National Draft Ben Carson for President Committee)	\$11,000.00	12/14/2016	\$11,000.00	11/01/2016	\$0.00	Committee will file for termination	04/14/2017	01/12/2017
	803	Majority Committee PAC--MC PAC Thomson, Jill	\$1,575.00	12/14/2016	\$1,575.00	11/23/2016	\$0.00	Attend FEC seminar	11/14/2017	12/06/2017
								Other	12/14/2016	01/25/2017
	804	Americans for a Conservative Direction	\$2,550.00	04/17/2017	\$2,550.00	04/17/2017	\$0.00	None		
	805	Reiff, Neil P., Esq. VoteVets.org Action Fund	\$2,000.00	01/04/2017	\$2,000.00	12/28/2016	\$0.00	Attend FEC seminar	12/07/2017	02/22/2018
								Develop a FEC Compliance Manual	03/05/2017	01/24/2018
	806	Marston, Chris Rodney for Congress	\$3,400.00	11/24/2016	\$3,400.00	03/01/2017	\$0.00	Attend FEC seminar	10/24/2017	09/28/2016
								Develop a FEC Compliance Manual	02/24/2017	02/22/2017
	808	Southwest Regional Council of Carpenters Legislative Improvement Cmte United Brotherhood of Carpenters & Joiners of America (SW CLIC) Thornhill, Randy	\$2,500.00	03/07/2017	\$2,500.00	03/07/2017	\$0.00	Attend FEC seminar	02/07/2018	03/29/2017
								Develop a FEC Compliance Manual	05/08/2017	05/09/2017
	810	Independence USA PAC Gubelli, Diane	\$3,300.00	05/05/2017	\$3,300.00	04/24/2017	\$0.00	Attend FEC seminar	04/05/2018	12/06/2017
								Other	06/05/2017	05/30/2017
	812	Foundation for a Greater America, Inc. Ault, Anastasia	\$3,750.00	05/19/2017				Committee will file for termination	07/19/2017	
	813	Scott Rigell for Congress	\$5,600.00	04/22/2017	\$5,600.00	04/18/2017	\$0.00	Committee will file for termination	05/22/2017	05/15/2017

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
		Wood, Joseph B.						Committee will file for termination Other	05/22/2017 04/22/2017	05/15/2017 04/21/2017
	818	Hundley, Seymour Kumar for Congress	\$8,300.00	06/09/2017	\$8,300.00	04/24/2017	\$0.00	Develop a FEC Compliance Manual	08/08/2017	07/11/2017
	819	National Right to Life Victory Fund Cockfield, Wayne	\$3,200.00	06/07/2017	\$3,200.00	04/27/2017	\$0.00	Conduct internal education program for employees or staff	06/09/2017	06/09/2017
	820	Working Families Party Independent Expenditure Committee Boland, Mike	\$3,350.00	08/05/2017	\$3,350.00	02/22/2018	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	07/06/2018 09/04/2017	
	824	Driscoll, Timothy J. Int'l Union of Bricklayers and Allied Craftworkers PAC	\$1,500.00	10/07/2017	\$1,500.00	09/26/2017	\$0.00	Attend FEC seminar	09/08/2018	
Sub-Total : FY -2017			\$63,055.00		\$59,305.00		\$0.00			
FY -2018	811	No, Treasurer ADR 714 Lone Star Committee	\$250.00	11/04/2017	\$250.00	01/23/2018	\$0.00	None		
	828	National Right To Life Political Action Committee Cockfield, Wayne	\$3,375.00	12/06/2017	\$3,375.00	12/06/2017	\$0.00	Conduct internal education program for employees or staff Develop a FEC Compliance Manual	03/06/2018 03/06/2018	03/06/2018 03/09/2018
	829	Adam Clayton Powell for Congress Weinstein, Mark J.	\$2,550.00	12/06/2017				File amended reports File future reports timely	12/06/2017	
	830	Orentlicher for Congress Gabovitch, David S.	\$2,150.00	12/17/2017	\$2,150.00	12/12/2017	\$0.00	Meet with RAD staff	12/17/2017	01/09/2018

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	831	Combs, Bill 21st Century Democrats	\$5,850.00	01/03/2018	\$5,850.00	01/02/2018	\$0.00	Develop a FEC Compliance Manual	03/04/2018	
	832	Democratic Party Of New Mexico Lara, Robert	\$8,600.00	01/12/2018	\$8,600.00	11/14/2017	\$0.00	Attend FEC seminar	12/13/2018	12/01/2017
	833	National Right to Life Victory Fund Cockfield, Wayne	\$6,000.00	12/06/2017	\$6,000.00	12/06/2017	\$0.00	Conduct internal education program for employees or staff Develop a FEC Compliance Manual	03/06/2018 03/06/2018	03/06/2018 03/09/2018
	835	Planned Parenthood Action Fund Inc. DBA Planned Parenthood Federal PAC Hubbard, Tshombe	\$2,600.00	02/16/2018	\$2,600.00	01/30/2018	\$0.00	Not Applicable		
	836	Lisker, Lisa Arizona Grassroots Action PAC	\$2,250.00	01/08/2018	\$2,250.00	01/24/2018	\$0.00	Develop a FEC Compliance Manual	03/07/2018	03/19/2018
	837	CITIZENS UNITED SUPER PAC LLC Catts, Lauren	\$5,850.00	01/24/2018	\$5,850.00	02/26/2018	\$0.00	Other	02/22/2018	
	838	Marston, Christopher M. Stutzman for Senate	\$8,340.00	04/05/2018	\$8,340.00	04/16/2018	\$0.00	Committee will file for termination		
	840	Democratic Party of Arkansas Vandiver, Dawne	\$10,400.00	02/20/2019				Attend FEC seminar File amended reports	02/20/2019 06/20/2018	
	841	Michigan Democratic State Central Committee/Fed. Acct. (fka) O'Brien, Sandy	\$8,600.00	03/22/2018	\$8,600.00	04/11/2018	\$0.00	Attend FEC seminar File amended reports	02/20/2019 06/20/2018	
	842	Arizona Republican Party	\$23,000.00	06/30/2018	\$23,000.00	06/20/2018	\$0.00	Attend FEC seminar	02/20/2019	

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
		Lettieri, Bob						Attend FEC seminar File amended reports	02/20/2019 04/22/2018	
	843	Himpler, Bill American Financial Services Association PAC Himpler, Bill American Financial Services Association PAC	\$11,000.00	03/05/2018	\$11,000.00	01/03/2018	\$0.00	Conduct & certify internal audit/reconciliation	02/01/2019 02/01/2020	
	844	Jimmy Gomez for Congress Hodge, Mary	\$2,400.00	03/05/2018	\$2,400.00	02/28/2018	\$0.00	Develop a FEC Compliance Manual	05/01/2018	07/19/2018
	845	Planned Parenthood Advocates of Wisconsin Political Fund Barnes, Mel	\$5,850.00	03/07/2018	\$5,850.00	04/04/2018	\$0.00	Attend FEC seminar	03/07/2019	
	848	Spies, Charles R., Esq. Right to Rise USA	\$2,100.00	04/20/2018	\$2,100.00	04/11/2018	\$0.00	Attend FEC seminar	03/22/2019	
	849	Backer, Dan The Committee to Defend the President	\$3,700.00	04/20/2018	\$3,700.00	04/05/2018	\$0.00	File amended reports	07/20/2018	
	850	The Loose Group Whelchel, John E.	\$3,800.00	05/04/2018	\$3,800.00	04/10/2018	\$0.00	Attend FEC seminar	04/04/2019	
	853	Hispanic Victory PAC Decker, Gustavo	\$7,600.00	08/15/2018	\$5,000.00	07/06/2018	\$2,600.00	None		
	854	Make America Great Again Caldwell, Leslie	\$3,375.00	05/11/2018	\$3,375.00	05/10/2018	\$0.00	File amended reports	06/11/2018	
	855	Utah Republican Party Young, Abram O.	\$7,800.00	05/16/2019				Attend FEC seminar	05/16/2019	

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
								File amended reports	08/16/2018	
	857	Minnesota Democratic Farmer Labor Party Morales, Tyler	\$2,500.00	06/01/2018				Attend FEC seminar	05/02/2019	
	860	Edward Jones PAC Hill, Jesse	\$4,000.00	08/15/2018				Attend FEC seminar	07/16/2019	
	863	Americans Deserve Better PAC, Inc Neale, Geoffrey J	\$2,000.00	08/24/2018	\$2,000.00	07/27/2018	\$0.00	Committee will file for termination	09/23/2018	
	866	Robinson, Eric Conservatives United	\$2,650.00	08/15/2018	\$2,650.00		\$0.00	Attend FEC seminar	07/16/2019	
	867	Working for Us Political Action Committee Inc. Rosenthal, Steven	\$6,600.00	08/18/2018				Other	08/18/2018	
	870	Eugene Ludwig	\$3,700.00	08/09/2018	\$3,700.00	07/24/2018	\$0.00	Other		
Sub-Total : FY -2018			\$158,890.00		\$122,440.00		\$2,600.00			
Grand Total :			\$280,745.00		\$240,545.00		\$2,600.00			

Agenda Document No. X18-59



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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AGENDA ITEM

October 31, 2018

For Meeting of 11-8-18

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP* by *MAH*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista Roche *KJR*
Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Thomas Hintermister *TH*
Assistant Staff Director
Audit Division

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2018 – 4th Quarter Highlights (7/1/18 – 9/30/18) & FY Statistical Overview

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the fourth quarter (7/1/18 – 9/30/18) and 2018 fiscal year statistical overview. The intent of this document is to provide an update of the workload and achieved results of the Office of Compliance on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during an upcoming Executive Session.

The attached **Appendix A** provides the Commission with fourth quarter highlights for each office and also a statistical overview of FY 2018 results and progression towards meeting the 2014-2019 Strategic Performance Goals adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled 'Proposed Final Audit Report – Due Date' which highlights the report manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2018 statistics for meeting strategic performance goals related to the Administrative Fine Program. Please note, additional audit materials are also available (b) (7)(E)

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the overview.

Alternative Dispute Resolution Office (ADRO)

In the fourth quarter of FY 2018, the ADRO received 13 cases (1 from RAD, 1 from Audit, 5 from OGC, and 6 from the Commission). During this time period, the ADRO closed a total of 10 cases, all with approved negotiated settlements. In the fourth quarter of FY 2018, the Commission assessed \$35,475 in civil penalties through approved negotiated settlements, and the office collected \$34,275.

(b) (7)(E)

At the start of the fourth quarter, all 6 committees elected to participate in ADR. Per the direction of the Commission, the ADRO Director is working with staff from RAD, Audit, Info and OGC to develop and implement a new educational program tailored to each committee. It is expected that during the first quarter of FY 2019 these agreements will circulate for Commission approval.

During the fourth quarter, ADRO selected an Assistant Director candidate, Ms. Rosa Marshall, to back fill the position previously occupied by the Director. Ms. Marshall transitioned from RAD to ADRO early in FY 2019.

Administrative Fine Program (Office of Administrative Review)

During the fourth quarter of FY 2018, the Commission processed 41 Reason to Believe (RTB) findings. OAR received 2 challenges and processed 1 Reviewing Officer Recommendation (ROR). The Commission reviewed final determination recommendations in 6 cases, made a final determination that the respondents in 5 cases violated 52 U.S.C. § 30104(a) and assessed \$29,739

in civil penalties. The Commission also collected \$24,411 in fine payments, transferred 4 cases to the Department of the Treasury for debt collection, and prepared 6 cases for public release.

(b) (7)(E)

(b) (7)(E) Additionally, OAR forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

During the fourth quarter, the Reviewing Officer worked with the Information Division and Pay.gov to successfully develop and deploy the FEC Training Electronic Payment System, participated on hiring panels, and also provided assistance to ADRO to handle an increased caseload.

Audit Division

During the fourth quarter of FY 2018, the Audit Division processed the following audit reports:

	Audit Report Stage	Number of Reports
Released to Public	Final Audit Report	2
Sent to the Committee	Interim Audit Report	3
	Draft Final Audit Report	1
Circulated to the Commission	Interim Audit Report	2
	Audit Division Recommendation Memorandum	1
	Proposed Final Audit Report	2
Forwarded to OGC	Interim Audit Report	1
	Draft Final Audit Report	1
	Audit Division Recommendation Memorandum	1
	Total # of Audit Reports	14

The Audit Division has a total of 12 open audits. Eight of these audits are Unauthorized committees, four are authorized and one is a Title 26 presidential committee.

Three of these audits are awaiting committee responses, four are in the report writing stage, four are with OGC, and one is awaiting a Commission vote.

With respect to the Presidential Election Campaign Fund (PECF), the Audit Division continued posting the monthly PECF reports to FEC website. Further, on October 10, 2018, Audit received the yearly request for the PECF budgetary expenditures and collections (FY2019-29) from the U.S. Treasury. Audit coordinated with the Treasury liaison to finalize the calculations and discussed the preliminary results with OGC. This document is scheduled to be

circulated to the Commissioners in mid-November. The proposed revisions to the FEC Directive on Convention and General Election Certification Procedures (LRA 1052) is awaiting Commission approval (circulated on June 28, 2017.)

Audit has assigned staff to several internal projects initiated to improve efficiency and quality of its work product. The Division also continues to focus on turnaround times to ensure that the average time for key stages within the audit process are as efficient as possible. (b) (7)(E)

(b) (7) (E)

Reports Analysis Division (RAD)

During the fourth quarter of FY 2018, RAD collaborated with several other divisions within the agency on projects and initiatives. RAD was part of a working group with OGC, OCIO, the Press Office, the Information Division and Congressional Affairs that developed a plan and guidance upon enactment of the law that made the FEC the point of entry for Senate filers. In addition, RAD collaborated with OCIO on phase one of the Electronic Filing Project, providing user stories and system requirements. RAD also collaborated with ADRO, the Audit Division, and the Information Division on the 2014 Audit/ADRO Education initiative, where negotiated settlement agreements are in the process of being developed, as well as corrective action and training plans.

RAD staff reviewed a total of 26,462 documents totaling 10,132,999 pages during the fourth quarter of FY 2018 and 90% of the reports were reviewed within 90 days of receipt for the current election cycle. RAD generated and sent 2,446 letters to the filing community during the fourth quarter and for FY 2018, 91% of RFAs were sent within 40 days of the report review date. Also during the fourth quarter, RAD generated 7 referrals (6 OGC, 1 ADRO) and sent 931 non-filer notices where the Commission approved recommendations to publish 28 authorized committees for failure to timely file an election-sensitive report. Finally, during the fourth quarter, the Reports Processing Branch coded 7,248,185 transactions, 2,498 documents and processed 274,569 pages from 2,409 documents in the Paper Automation system.

RAD is currently in the process of back filling several positions. Interviews are currently being conducted to fill seven (7) GS-7 Campaign Finance Analyst (CFA) positions, one (1) Senior Campaign Finance & Reviewing Analyst (GS-12) promotion position, and a Data Disclosure


¹ See the document Audit Division – Key Audit Stages(b) (7)(E)

Assistant position (GS-8). In addition, a vacancy announcement was recently posted to fill an Assistant Branch Chief position on the Party/Non-Party branch which was vacated due to a transfer to ADRG. Further, given a recent resignation, we will be seeking approval to backfill additional GS-12 and GS-7 CFA positions.

Finally, RAD developed recommendations for the 2019-2020 RAD Review and Referral Procedures during the fourth quarter. Our proposed recommendations include feedback from OGC, ADRG and the Audit Division. The document has been sent to Commission Offices for review and comment and we plan to request that it be added to the November 14th Executive Session agenda with the goal of Commission approval before the end of the year.

Attachments

Appendix A, FY 2018 Highlights and FY Overview for Office of Compliance Goals
Appendix B, Open Audits Report
Appendix C, Proposed Final Audit Report – Due Date
Appendix D, ADR Civil Penalty Report
Appendix E, AF Performance Goals Report



Status of Compliance

FY 2018
(10/1/2017 – 9/30/2018)



Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 15	FY 16	FY 17	FY 18 (9/30/18)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	99.0%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2018 Performance Goals	Status 9/30/18
RAD staff collaborated with OGC, OCIO, the Press Office, Congressional Affairs, and the Information Division on a plan and guidance for Senate filers upon enactment of law requiring them to file with the FEC.	Immediately after legislation was signed into law, guidance was placed on the FEC website and emailed to all Senate filers. It was also included in the FEC Digest and as a Tips for Treasurers.
RAD staff collaborated with ADRO, Audit, OGC and the Information Division on the Audit/ADRO Education Group for 2014 cycle audit referrals, as directed by the Commission.	Negotiated settlement agreements are in the process of being developed. Corrective action plans and training plans have been developed for all six committees.
RAD staff participated in the kick off meeting and subsequent status meetings for the Next Gen Efiling Project.	Phase 1 of development is underway. RAD staff provided user stories and participated in requirements gathering.

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 2: Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs

Performance Goals	FY 13	FY 14	FY 15	FY 16	FY 17	FY 18 (9/30/18)
RAD to review 75% of reports within 90 days of receipt	72.6%	85.4%	79.3%	92.9%	76.6%	92.2%
RAD to send 75% of RFAs within 40 days of report review	72%	84%	92%	92%	88%	88%
(b) (7)(E)	91.1%	96.8%	93.5%	100%	96.2%	96.9%
(b) (7)(E)	38%	93%	43%	56%	25%	46%
OAR to circulate 60% of Reviewing Officer Recommendations within 60 days	93%	100%	97%	81.8%	96.67%	100%
(b) (7)(E)	100%	95%	100%	100%	100%	99%

Strategic Objective 4: Foster a Culture of High Performance

Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 13	FY 14	FY 15	FY 16	FY 17	FY 18 (9/30/18)
RAD	Documents/ Transactions Coded	N/A	N/A	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	9,125/ 30,869,828
	Documents/Pages Processed in Paper Automation System	N/A	N/A	N/A	N/A	8,139/ 684,747	8,822/ 902,572
	Documents/Pages Reviewed	87,190/ 10,490,683	68,282/ 9,211,502	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726
	Letters sent	15,543	10,220	13,433	13,253	14,796	13,763
	Telephone calls handled	14,254	10,673	11,822	12,362	11,634	13,036
	Referrals	88	59	91	43	95	46
	AF Cases RTB/FD	194/184	70/55	191/159	83/33	163/168	95/23
Audit	(b) (7)(E)						
ADRO							
OAR	Cases Received	26	6	35	12	29	8
	Cases Closed (FD)	31	5	32	11	32	10



Open Audits

As of 10/31/2018
(Confidential and Sensitive)

		<u>Date of Last Action</u>	<u>Audit Manager</u>	<u>Report Track</u>	
10 Day Response Period to the Exit Conference					
2016	THE 2016 COMMITTEE	C00569905	10/31/2018	Favin	B
				Total - 1	
Interim/Preliminary Report Writing					
2016	SOUTH DAKOTA DEMOCRATIC PARTY	C00160937	09/06/2018	Favin	B
2016	MISSISSIPPI REPUBLICAN PARTY	C00084368	10/03/2018	Pacious	B
2016	NEW JERSEY REPUBLICAN STATE COMMITTEE	C00164418	10/30/2018	Morcomb	B
				Total - 3	
Interim/Preliminary Audit Report Committee Response Period					
2016	AMBULATORY SURGERY CENTER ASSOCIATION PAC (ASCAPAC)	C00424788	10/30/2018	Pacious	B
				Total - 1	
Draft Final Audit Report Committee Response Period					
2016	TONY CARDENAS FOR CONGRESS	C00498873	10/23/2018	Smith	B
				Total - 1	
Audit Division Recommendation Memorandum Writing					
2016	MARSHA BLACKBURN FOR CONGRESS, INC.	C00376939	10/30/2018	Morcomb	B
				Total - 1	
Audits in OGC					
2016	OKLAHOMA DEMOCRATIC PARTY	C00190934	IAR 10/15/2018	Morcomb	B
2016	JILL STEIN FOR PRESIDENT	C00581199	DFAR 10/19/2018	Burgess	B
2016	HALL FOR CONGRESS	C00497859	DFAR 10/25/2018	Burgess	B
2016	TENNESSEE DEMOCRATIC PARTY	C00167346	IAR 10/26/2018	Burgess	B
				Total - 4	
Audits with the Commission					
2016	FRIENDS OF ERIK PAULSEN	C00439661	ADRM 10/24/2018	Pacious	B
				Total - 1	



Open Audits

As of 10/31/2018
(Confidential and Sensitive)

12 Open Audits

Legend

Track A	Audits with <u>no</u> unresolved legal issues
Track B	State/Local Party audits with findings PAC audits with unresolved legal issues Authorized audits with unresolved legal issues
Track C	Audits with <u>no</u> findings
IAR	Interim Audit Report
PAR	Preliminary Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report
Text	If text is red, the report has not been sent to OGC for a legal analysis



Open Audits
As of 10/31/2018
(Confidential and Sensitive)

Audit Caseload

Audit Manager	Number of Audits	Percent of Total Audits ¹
Burgess	3	25%
Favin	2	17%
Morcomb	3	25%
Pacious	3	25%
Smith	1	8%
Totals	12	100%

¹ May not total 100% due to rounding



Open Audits
As of 10/31/2018
(Confidential and Sensitive)

Comments

2016

Ambulatory Surgery Center Assoc. PAC (ASCAPAC)
(b) (5)

Friends of Erik Paulsen
(b) (5)

Hall for Congress
(b) (5)

Jill Stein for President
(b) (5)

Marsha Blackburn for Congress. Inc.
(b) (5)

Mississippi Republican Party
(b) (5)

New Jersey Republican State Committee
(b) (5)

Oklahoma Democratic Party
(b) (5)

South Dakota Democratic Party
(b) (5)

Tennessee Democratic Party
(b) (5)

The 2016 Committee
(b) (5)

Tony Cardenas for Congress
(b) (5)



Proposed Final Audit Report - Due Date

As of 10/30/2018

(Confidential and Sensitive)

	<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2016 JILL STEIN FOR PRESIDENT	Burgess	DFAR	OGC Reviewing	11/30/2016
2016 HALL FOR CONGRESS	Burgess	DFAR	OGC Reviewing	05/03/2017
2016 FRIENDS OF ERIK PAULSEN	Pacious	ADRM	Circulated to Commission	05/03/2017
2016 MARSHA BLACKBURN FOR CONGRESS, INC.	Lmorcomb	DFAR	Committee Response Period	05/03/2017
2016 TONY CARDENAS FOR CONGRESS	Smith	DFAR	Committee Response Period	05/03/2017
2016 AMBULATORY SURGERY CENTER ASSOCIATION PAC (ASCAPAC)	Pacious	IAR	Committee Response Period	11/29/2017
2016 NEW JERSEY REPUBLICAN STATE COMMITTEE	Lmorcomb	IAR	Report Writing	11/29/2017
2016 OKLAHOMA DEMOCRATIC PARTY	Lmorcomb	IAR	OGC Reviewing	11/29/2017
2016 SOUTH DAKOTA DEMOCRATIC PARTY	Favin	IAR	Report Writing	11/29/2017
2016 TENNESSEE DEMOCRATIC PARTY	Burgess	IAR	OGC Reviewing	01/26/2018
2016 THE 2016 COMMITTEE	Favin	IAR	10 Day Response Period to the Exit Conference	11/29/2017
2016 MISSISSIPPI REPUBLICAN PARTY	Pacious	IAR	Report Writing	01/26/2018

(b) (7)(E)



Proposed Final Audit Report - Due Date

As of 10/30/2018

(Confidential and Sensitive)

12 Open Audits

Legend

IAR	Interim Audit Report
PAR	Preliminary Audit Report
DFAR	Draft Final Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year: 10/01/2016 To: 09/30/2018

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY -2017	791	Oklahoma Leadership Council Hodges, Peter Leo	\$8,750.00	10/12/2017	\$8,750.00	10/10/2017	\$0.00	Attend FEC seminar	04/12/2018	08/30/2017
	796	Lowey, Keith D. Duckworth for Congress	\$2,280.00	02/19/2017	\$2,280.00	01/06/2017	\$0.00	Committee will file for termination	04/19/2017	01/31/2017
	800	The 2016 Draft Committee (f/k/a National Draft Ben Carson for President Committee)	\$11,000.00	12/14/2016	\$11,000.00	11/01/2016	\$0.00	Committee will file for termination	04/14/2017	01/12/2017
	803	Majority Committee PAC--MC PAC Thomson, Jili	\$1,575.00	12/14/2016	\$1,575.00	11/23/2016	\$0.00	Attend FEC seminar	11/14/2017	12/06/2017
								Other	12/14/2016	01/25/2017
	804	Americans for a Conservative Direction	\$2,550.00	04/17/2017	\$2,550.00	04/17/2017	\$0.00	None		
	805	Reiff, Neil P., Esq. VoteVets.org Action Fund	\$2,000.00	01/04/2017	\$2,000.00	12/28/2016	\$0.00	Attend FEC seminar	12/07/2017	02/22/2018
								Develop a FEC Compliance Manual	03/05/2017	01/24/2018
	806	Marston, Chris Rodney for Congress	\$3,400.00	11/24/2016	\$3,400.00	03/01/2017	\$0.00	Attend FEC seminar	10/24/2017	09/28/2016
								Develop a FEC Compliance Manual	02/24/2017	02/22/2017
	808	Southwest Regional Council of Carpenters Legislative Improvement Cmte United Brotherhood of Carpenters & Joiners of America (SW CLIC)	\$2,500.00	03/07/2017	\$2,500.00	03/07/2017	\$0.00	Attend FEC seminar	02/07/2018	03/29/2017

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
		Thornhill, Randy						Attend FEC seminar Develop a FEC Compliance Manual	02/07/2018 05/08/2017	03/29/2017 05/09/2017
	810	Independence USA PAC Gubelli, Diane	\$3,300.00	05/05/2017	\$3,300.00	04/24/2017	\$0.00	Attend FEC seminar Other	04/05/2018 06/05/2017	12/06/2017 05/30/2017
	812	Foundation for a Greater America, Inc. Ault, Anastasia	\$3,750.00	05/19/2017				Committee will file for termination	07/19/2017	
	813	Scott Rigell for Congress Wood, Joseph B.	\$5,600.00	04/22/2017	\$5,600.00	04/18/2017	\$0.00	Committee will file for termination Other	05/22/2017 04/22/2017	05/15/2017 04/21/2017
	818	Hundley, Seymour Kumar for Congress	\$8,300.00	06/09/2017	\$8,300.00	04/24/2017	\$0.00	Develop a FEC Compliance Manual	08/08/2017	07/11/2017
	819	National Right to Life Victory Fund Cockfield, Wayne	\$3,200.00	06/07/2017	\$3,200.00	04/27/2017	\$0.00	Conduct internal education program for employees or staff	06/09/2017	06/09/2017
	820	Working Families Party Independent Expenditure Committee Boland, Mike	\$3,350.00	08/05/2017	\$3,350.00	02/22/2018	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	07/06/2018 09/04/2017	
	824	Driscoll, Timothy J. Int'l Union of Bricklayers and Allied Craftworkers PAC	\$1,500.00	10/07/2017	\$1,500.00	09/26/2017	\$0.00	Attend FEC seminar	09/08/2018	
Sub-Total : FY -2017			\$63,055.00		\$59,305.00		\$0.00			
FY -2018	811	No, Treasurer ADR 714 Lone Star Committee	\$250.00	11/04/2017	\$250.00	01/23/2018	\$0.00	None		

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	828	National Right To Life Political Action Committee Cockfield, Wayne	\$3,375.00	12/06/2017	\$3,375.00	12/06/2017	\$0.00	Conduct internal education program for employees or staff Develop a FEC Compliance Manual	03/06/2018 03/06/2018	03/06/2018 03/09/2018
	829	Adam Clayton Powell for Congress Weinstein, Mark J.	\$2,550.00	12/06/2017				File amended reports File future reports timely	12/06/2017	
	830	Orentlicher for Congress Gabovitch, David S.	\$2,150.00	12/17/2017	\$2,150.00	12/12/2017	\$0.00	Meet with RAD staff	12/17/2017	01/09/2018
	831	Combs, Bill 21st Century Democrats	\$5,850.00	01/03/2018	\$5,850.00	01/02/2018	\$0.00	Develop a FEC Compliance Manual	03/04/2018	
	832	Democratic Party Of New Mexico Lara, Robert	\$8,600.00	01/12/2018	\$8,600.00	11/14/2017	\$0.00	Attend FEC seminar	12/13/2018	12/01/2017
	833	National Right to Life Victory Fund Cockfield, Wayne	\$6,000.00	12/06/2017	\$6,000.00	12/06/2017	\$0.00	Conduct internal education program for employees or staff Develop a FEC Compliance Manual	03/06/2018 03/06/2018	03/06/2018 03/09/2018
	835	Planned Parenthood Action Fund Inc. DBA Planned Parenthood Federal PAC Hubbard, Tshombe	\$2,600.00	02/16/2018	\$2,600.00	01/30/2018	\$0.00	Not Applicable		
	836	Lisker, Lisa Arizona Grassroots Action PAC	\$2,250.00	01/08/2018	\$2,250.00	01/24/2018	\$0.00	Develop a FEC Compliance Manual	03/07/2018	03/19/2018
	837	CITIZENS UNITED SUPER PAC LLC Catts, Lauren	\$5,850.00	01/24/2018	\$5,850.00	02/26/2018	\$0.00	Other	02/22/2018	
	838	Marston, Christopher M.	\$8,340.00	04/05/2018	\$8,340.00	04/16/2018	\$0.00	Committee will file for termination		

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
		Stutzman for Senate						Committee will file for termination		
	840	Democratic Party of Arkansas Vandiver, Dawne	\$10,400.00	02/20/2019				Attend FEC seminar File amended reports	02/20/2019 06/20/2018	
	841	Michigan Democratic State Central Committee O'Brien, Sandy	\$8,600.00	03/22/2018	\$8,600.00	04/11/2018	\$0.00	Attend FEC seminar File amended reports	02/20/2019 06/20/2018	
	842	Arizona Republican Party Lettieri, Bob	\$23,000.00	06/30/2018	\$23,000.00	06/20/2018	\$0.00	Attend FEC seminar File amended reports	02/20/2019 04/22/2018	04/20/2018
	843	Himpler, Bill American Financial Services Association PAC Himpler, Bill American Financial Services Association PAC	\$11,000.00	03/05/2018	\$11,000.00	01/03/2018	\$0.00	Conduct & certify internal audit/reconciliation	02/01/2019 02/01/2020	
	844	Jimmy Gomez for Congress Hodge, Mary	\$2,400.00	03/05/2018	\$2,400.00	02/28/2018	\$0.00	Develop a FEC Compliance Manual	05/01/2018	07/19/2018
	845	Planned Parenthood Advocates of Wisconsin Political Fund Barnes, Mel	\$5,850.00	03/07/2018	\$5,850.00	04/04/2018	\$0.00	Attend FEC seminar	03/07/2019	
	848	Spies, Charles R., Esq. Right to Rise USA	\$2,100.00	04/20/2018	\$2,100.00	04/11/2018	\$0.00	Attend FEC seminar	03/22/2019	
	849	Backer, Dan	\$3,700.00	04/20/2018	\$3,700.00	04/05/2018	\$0.00	File amended reports	07/20/2018	

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
		The Committee to Defend the President						File amended reports	07/20/2018	
	850	The Loose Group Whelchel, John E.	\$3,800.00	05/04/2018	\$3,800.00	04/10/2018	\$0.00	Attend FEC seminar	04/04/2019	
	851	Al Lawson for Congress Session, Johnny Frank	\$2,650.00	10/07/2018	\$2,650.00	10/29/2018	\$0.00	Attend FEC seminar	09/07/2019	
	853	Hispanic Victory PAC Decker, Gustavo	\$7,600.00	08/15/2018	\$7,600.00	08/09/2018	\$0.00	None		
	854	Make America Great Again Caldwell, Leslie	\$3,375.00	05/11/2018	\$3,375.00	05/10/2018	\$0.00	File amended reports	06/11/2018	
	855	Utah Republican Party Young, Abram O.	\$7,800.00	05/16/2019				Attend FEC seminar File amended reports	05/16/2019 08/16/2018	
	857	Minnesota Democratic Farmer Labor Party Morales, Tyler	\$2,500.00	06/01/2018	\$2,500.00	09/05/2018	\$0.00	Attend FEC seminar	05/02/2019	
	860	Edward Jones PAC Hill, Jesse	\$4,000.00	08/15/2018	\$4,000.00	08/03/2018	\$0.00	Attend FEC seminar	07/16/2019	
	863	Americans Deserve Better PAC, Inc Neale, Geoffrey J.	\$2,000.00	08/24/2018	\$2,000.00	07/27/2018	\$0.00	Committee will file for termination	09/23/2018	
	864	Nevada Republican Central Committee Bertrand, Michael J.	\$5,000.00	09/30/2018	\$5,000.00	09/14/2018	\$0.00	Attend FEC seminar	11/28/2018	09/05/2018
	866	Robinson, Eric Conservatives United	\$2,650.00	08/15/2018	\$2,650.00		\$0.00	Attend FEC seminar	07/16/2019	

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	867	Working for Us Political Action Committee Inc. Rosenthal, Steven	\$6,600.00	08/18/2018	\$6,600.00	08/14/2018	\$0.00	Other	08/18/2018	07/31/2018
	868	National Nurses United for Patient Protection Kuhl, Martha	\$3,500.00	10/20/2018	\$3,500.00	10/16/2018	\$0.00	Attend FEC seminar	09/20/2019	
	869	MOVEON.ORG Political Action Matzzie, Tom	\$1,575.00	09/28/2018	\$1,575.00	09/05/2018	\$0.00	Other	09/28/2018	
	870	Eugene Ludwig	\$3,700.00	08/09/2018	\$3,700.00	07/24/2018	\$0.00	Other		
	876	National Association of Insurance and Financial Advisors Political Action Comm Tassey, Matthew S.	\$3,800.00	10/13/2018	\$3,800.00	09/18/2018	\$0.00	Attend FEC seminar	09/13/2019	10/04/2018
Sub-Total : FY -2018			\$175,415.00		\$154,665.00		\$0.00			
Grand Total :			\$238,470.00		\$213,970.00		\$0.00			



AF Performance Goals

Print Date: October 31, 2018

Selected Parameters:

Office:	Both
Start Date:	10/01/2017
End Date:	09/30/2018
*Exception:	YES



AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)_____
Processed						
2017	/ECop)	H_S_P_UNAUTH	N	01/31/2018	04/17/2018	
2017	YE	H_S_P_UNAUTH	N	01/31/2018	03/26/2018	
2017	M12	P_UNAUTH	N	12/20/2017	02/12/2018	
2017	M11	P_UNAUTH	N	11/20/2017	01/08/2018	
2017	M10	P_UNAUTH	N	10/20/2017	11/27/2017	
2017	Q3	H_S_P	N	10/15/2017	11/27/2017	
2017	M9	P_UNAUTH	N	09/20/2017	11/06/2017	
2017	M8	P_UNAUTH	N	08/20/2017	10/02/2017	
2018	30SG	AUTH	N	07/30/2018	09/24/2018	
2018	M7	P_UNAUTH	N	07/20/2018	09/17/2018	
2018	Q2	H_S_P_UNAUTH	N	07/15/2018	09/11/2018	
2018	M6	P_UNAUTH	N	06/20/2018	07/30/2018	
2018	12P	AUTH	Y	05/31/2018	07/23/2018	
2018	12P	AUTH	Y	05/24/2018	07/23/2018	
2018	M5	P_UNAUTH	N	05/20/2018	07/16/2018	
2018	12P	AUTH	Y	05/03/2018	06/25/2018	
2018	12P	AUTH	Y	04/26/2018	06/18/2018	
2018	M4	P_UNAUTH	N	04/20/2018	06/11/2018	
2018	Q1	H_S_P_UNAUTH	N	04/15/2018	06/11/2018	
2018	M3	P_UNAUTH	N	03/20/2018	05/15/2018	
2018	12P	AUTH	Y	02/22/2018	04/23/2018	
2018	M2	P_UNAUTH	N	02/20/2018	04/30/2018	

Total AF Reports Processed 22

Average Processing Days 53.95

(b) (7)(E)

Percentage to Goal 90.91%

Processed - No committees

2017	30SG	AUTH	N	01/11/2018	03/07/2018
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(b) (7)(E)



AF Performance Goals

(Confidential and Sensitive)

Processed - No committees

Action Date

2017	30SG	AUTH	N	12/07/2017	01/29/2018
2017	12SG	AUTH	Y	11/30/2017	01/08/2018
2017	12SG	AUTH	Y	10/26/2017	12/14/2017
2017	M10	P_UNAUTH	Y	10/20/2017	11/20/2017
2017	Q3	H_S_P	Y	10/15/2017	12/05/2017
2017	12SPR	AUTH	Y	09/14/2017	11/06/2017
2018	12P	AUTH	Y	07/30/2018	09/24/2018
2018	12P	AUTH	Y	07/26/2018	09/24/2018
2018	12SG	AUTH	Y	07/26/2018	09/24/2018
2018	12SP	AUTH	Y	07/26/2018	09/24/2018
2018	12P	AUTH	Y	07/23/2018	09/17/2018
2018	12P	AUTH	Y	07/21/2018	09/17/2018
2018	12PR	AUTH	Y	07/12/2018	09/05/2018
2018	12P	AUTH	Y	07/08/2018	09/05/2018
2018	12PR	AUTH	Y	07/05/2018	08/30/2018
2018	12SG	AUTH	Y	06/18/2018	07/30/2018
2018	12P	AUTH	Y	06/14/2018	07/30/2018
2018	12PR	AUTH	Y	06/14/2018	07/30/2018
2018	12P	AUTH	Y	06/07/2018	07/23/2018
2018	12PR	AUTH	Y	06/07/2018	07/23/2018
2018	30SG	AUTH	N	05/24/2018	07/16/2018
2018	12P	AUTH	Y	05/10/2018	06/26/2018
2018	12PR	AUTH	Y	05/10/2018	06/26/2018
2018	12C	AUTH	Y	05/07/2018	06/25/2018
2018	12C	AUTH	Y	05/06/2018	06/25/2018
2018	12C	AUTH	Y	05/02/2018	06/25/2018
2018	12C	AUTH	Y	04/29/2018	06/25/2018
2018	12SP	AUTH	Y	04/26/2018	06/21/2018
2018	12C	AUTH	Y	04/23/2018	06/18/2018
2018	12C	AUTH	Y	04/18/2018	06/11/2018
2018	12C	AUTH	Y	04/16/2018	06/11/2018
2018	12SG	AUTH	Y	04/12/2018	06/05/2018
2018	30SG	AUTH	N	04/12/2018	06/05/2018
2018	12C	AUTH	Y	04/10/2018	06/05/2018
2018	12C	AUTH	Y	04/09/2018	06/05/2018
2018	12C	AUTH	Y	04/02/2018	05/24/2018
2018	12C	AUTH	Y	03/12/2018	05/02/2018
2018	12P	AUTH	Y	03/08/2018	05/02/2018
2018	12C	AUTH	Y	03/05/2018	04/30/2018

(b) (7)(E)



AF Performance Goals

(Confidential and Sensitive)

Processed - No committees

				Action Date	
2018	12SG	AUTH	Y	03/01/2018	04/30/2018
2018	12C	AUTH	Y	02/26/2018	04/26/2018
2018	12SP	AUTH	Y	02/15/2018	04/12/2018

(b) (7)(E)

Total AF Reports Processed-No Committees	43
Average Processing Days	52.70
(b) (7)(E)	
Percentage to Goal	100.00%

Total AF Reports	65
Average Processing Days	53.12
(b) (7)(E)	
Percentage to Goal	96.92%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters
RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2017	Q1	3328	C00476457	09/05/2017	10/25/2017	50	Y
2016	48H	3336	C00607762	10/31/2017	12/28/2017	58	Y
2017	MY	3343	C00630012	10/24/2017	12/20/2017	57	Y
2017	MY	3344	C00623355	10/30/2017	12/14/2017	45	Y
2017	Q3	3350	C00440909	01/09/2018	03/07/2018	57	Y
2017	Q3	3351	C00640219	12/28/2017	02/21/2018	55	Y
2018	12P	3367	C00659110	06/11/2018	06/28/2018	17	Y
2014	48H	3373	C00512236	07/26/2018	08/30/2018	35	Y

Total Challenges Processed 8

Average Processing Days 46.75

Total Reports Processed within 60 Days 8

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION

2019 FEB 28 PM 3:34

February 28, 2019

SENSITIVE

MEMORANDUM

AGENDA DOCUMENT NO. X-19-06

AGENDA ITEM

For meeting of 3-19-19

TO: The Commission

THROUGH: Alec Palmer
Staff Director

AP

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista Roche *KJR*
Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2019 – 4th Quarter Highlights (10/1/18 – 12/31/18) & FY Statistical Overview

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the 1st quarter FY 2019 (10/1/18 – 12/31/18) and fiscal year statistical overview. The intent of this document is to provide an update of the workload and achieved results of the Office of Compliance on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during an upcoming Executive Session.

The attached **Appendix A** provides the Commission with first quarter highlights for each office and also a statistical overview of FY 2019 results and progression towards meeting the 2014-2019 Strategic Performance Goals adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled 'Proposed Final Audit Report – Due Date' which highlights the report

manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2019 statistics for meeting strategic performance goals related to the Administrative Fine Program. **Appendix F** (AF Penalties Assessed and Collected) shows the total amount of penalties assessed and collection rate for FY 2015 – 2019. Please note, additional audit materials are also available (b) (7)(E)

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the overview.

Alternative Dispute Resolution Office (ADRO)

In the first quarter of FY 2019, the ADRO received 7 cases (2 from RAD, 4 from OGC, and 1 from the Commission). During this time period, the ADRO closed a total of 8 cases, all with approved negotiated settlements. In the first quarter of FY 2019, the Commission assessed \$15,550 in civil penalties through approved negotiated settlements, and the office collected \$13,150.

(b) (7)(E)

During FY 2018, the Commission authorized ADRO to make contact with 6 committees who were the subject of outstanding 2014 election cycle audits and offer an opportunity to participate in the ADR process and terminate the audit process. All 6 committees elected to participate in ADR. ADRO worked with staff from RAD, Audit, Info and OGC to develop and implement a new educational program tailored to each committee. During the first quarter of FY 2019 the Negotiated Settlements were circulated to the Commission for approval.

During the first quarter, ADRO filled the position of Assistant Director, to backfill the position previously occupied by the Director. Additionally, ADRO posted for the position of ADR Specialist (GS-11/12) to assist the office in processing its caseload and enhancing its operational efficiency. That position will be filled during the second quarter of FY 2019.

Administrative Fine Program (Office of Administrative Review)

During the first quarter of FY 2019, the Commission processed 83 Reason to Believe (RTB) findings. OAR received 6 challenges and processed 5 Reviewing Officer Recommendations (ROR). The Commission reviewed final determination recommendations in 15 cases, made a final determination that the respondents in all 15 cases violated 52 U.S.C. § 30104(a), and assessed \$61,636 in civil penalties. The Commission also collected \$73,766 in fine payments and prepared 16 cases for public release.

(b) (7)(E)
(b) (7)(E)

Additionally, OAR forwarded 100%

of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

During the first quarter, the Reviewing Officer worked with OCIO and OCFO to enhance financial reports to accommodate OCFO reporting requirements and increase efficiency in reconciliation. The Reviewing Officer also participated on hiring panels and provided assistance to ADRO to handle an increased caseload.

Audit Division

During the first quarter of FY 2019, the Audit Division processed the following audit reports:

	Audit Report Stage	Number of Reports
Released to Public	Final Audit Report	0
Sent to the Committee	Interim Audit Report	2
	Draft Final Audit Report	4
Circulated to the Commission	Interim Audit Report	4
	Audit Division Recommendation Memorandum	4
	Proposed Final Audit Report	2
Forwarded to OGC	Interim Audit Report	4
	Draft Final Audit Report	4
	Audit Division Recommendation Memorandum	4
	Total # of Audit Reports	28

The Audit Division has a total of 10 open audits. Seven of these audits are unauthorized committees, two are authorized and one is a Title 26 presidential committee. Additionally, during the 1st quarter the number of reports processed by the audit division doubled from the last quarter.

Two audits are awaiting committee responses, four are in the report writing stage, two are with OGC, and two are awaiting a Commission vote.

As of February 8, 2019, the Audit Division no longer has an Assistant Staff Director. Management staff is reporting directly to the Chief Compliance Officer until a long term plan is presented and approved by the Commission.

With respect to the Presidential Election Campaign Fund (PECF), the Audit Division continued forwarding the monthly PECF reports received from the U.S. Treasury, to the Information Technology Division for web placement. Further, in November 2018, the Audit Division prepared the budgetary calculations for the PECF's fiscal years 2019 through 2029. The Commission subsequently approved the calculations and the Audit Division formally responded to the U.S. Treasury on November 27, 2018. The Audit Division updated the list of the

Commission's authorized signatories for the calendar year 2019 and provided it to the Secretary of the U.S. Treasury. The Audit Division is in the process of updating the Federal Register notice regarding the submission dates for the 2020 presidential cycle.

The proposed revisions to the FEC Directive 23 on Convention and General Election Certification Procedures (LRA 1052) is still awaiting Commission approval (circulated on June 28, 2017.)

The Audit Division remains focused on turnaround times to ensure that the average time for key stages within the audit process are as efficient as possible. (b) (7)(E)

(b) (7)(E)

(b) (7)(E)

Reports Analysis Division (RAD)

During the first quarter of FY 2019, RAD collaborated with OGC and Commission Offices on guidance for the filing community following the *CREW v. FEC* decision. The guidance was issued as a press release and has since been added to the "Other Filers" section of the FEC website. In addition, RAD continued its collaboration with the Information Division on the development of reporting examples for the website, completing reporting examples for various Independent Expenditure scenarios during the quarter. Further, RAD continued to partner with ADRO, the Audit Division, and the Information Division on the 2014 Audit/ADRO Education initiative, assisting with the development of tailored training plans which were included in the Negotiated Settlements for the six committees. The settlements were circulated to the Commission for approval during the first quarter.

RAD staff reviewed a total of 24,267 documents totaling 7,952,625 pages during the first quarter of FY 2019 and 95.6% of the reports were reviewed within 90 days of receipt for the current election cycle. RAD generated and sent 2,155 letters to the filing community during the

¹ See the document Audit Division – Key Audit Stages (b) (7)(E)
(b) (7)(E)

first quarter and 88% of RFAs were sent within 40 days of the report review date. Also during the first quarter, RAD generated 6 referrals (1 OGIC, 2 ADRG, 3 Administrative Fines) and sent 1,860 non-filer notices where the Commission approved recommendations to publish 19 authorized committees for failure to timely file an election-sensitive report. Finally, during the first quarter, the Reports Processing Branch coded 9,907,405 transactions, 1,984 documents and processed 19,706 pages from 1,920 documents in the Paper Automation system.

RAD managers spent a substantial amount of time on recruitment during the first quarter. We recently welcomed five new Campaign Finance Analysts (CFA), filled two Senior Campaign Finance & Reviewing Analyst (GS-12) promotion positions, a Data Disclosure Assistant position, an Assistant Branch Chief position on the Party/Non-Party Branch, and a detail for the Supervisory Training and Program Manager position vacated by a detail to another office. Further, due to a recent resignation and a transfer to ADRG, we will be seeking approval to backfill additional GS-12 and GS-7 CFA positions.

Finally, during the first quarter RAD received Commission approval of proposed recommendations for the 2019-2020 RAD Review and Referral Procedures. We are currently in the process of finishing up the review from the 2018 cycle and making audit referral assessments after experiencing a back log due to the shutdown. We anticipate beginning 2019-2020 cycle review in April, if not sooner.

Attachments

Appendix A, FY 2019 Highlights and FY Overview for Office of Compliance Goals


Appendix B, Open Audits Report

Appendix C, Proposed Final Audit Report – Due Date

Appendix D, ADR Civil Penalty Report

Appendix E, AF Performance Goals Report

Appendix F, AF Penalties Assessed and Collected



Status of Compliance

FY 2019
(10/1/2018 - 12/31/2018)

Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19 (12/31/18)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%	93%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	99.0%	99.9%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2019 Performance Goals	Status 12/31/18
RAD staff collaborated with OGC on guidance for the filing community following the <i>CREW v. FEC</i> decision.	The guidance has been placed on the “Other Filers” section of the FEC website and was also included in the weekly FEC Digest on October 5, 2018.
RAD staff collaborated with ADRO, Audit, OGC and the Information Division on the Audit/ADRO Education Group for 2014 cycle audit referrals, as directed by the Commission.	Negotiated settlement agreements were approved by the Commission on February 11, 2019. RAD, ADRO and Audit are in the process of developing the training material. The training will be conducted within the next couple months.
RAD staff collaborated with ADRO, OGC and the Audit Division on proposed recommendations for the 2019-2020 RAD Review and Referral Procedures.	The Commission approved the recommendations on December 13, 2018.

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 2: Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs

Performance Goals	FY 14	FY 15	FY 16	FY 17	FY 18	FY 19 (12/31/18)
RAD to review 75% of reports within 90 days of receipt	85.4%	79.3%	92.9%	76.6%	92.2%	95.6%
RAD to send 75% of RFAs within 40 days of report review	84%	92%	92%	88%	88%	88%
(b) (7)(E)	96.8%	93.5%	100%	96.2%	96.9%	95.5%
(b) (7)(E)	93%	43%	56%	25%	46%	N/A ¹
OAR to circulate 60% of Reviewing Officer Recommendations within 60 days	100%	97%	81.8%	96.67%	100%	100%
(b) (7)(E)	95%	100%	100%	100%	99%	100%

¹-No audits were approved in Q1

Strategic Objective 4: Foster a Culture of High Performance

Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 14	FY 15	FY 16	FY 17	FY 18	FY 19 (12/31/18)
RAD	Documents/ Transactions Coded	N/A	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	9,125/ 30,869,828	1,984/ 9,907,405
	Documents/Pages Processed in Paper Automation System	N/A	N/A	N/A	8,139/ 684,747	8,822/ 902,572	1,920/ 19,706
	Documents/Pages Reviewed	68,282/ 9,211,502	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	24,267/ 7,952,625
	Letters sent	10,220	13,433	13,253	14,796	13,763	4,015
	Telephone calls handled	10,673	11,822	12,362	11,634	13,036	4,447
	Referrals	59	91	43	95	46	6
	AF Cases RTB/FD	70/55	191/159	83/33	163/168	95/23	83/12
Audit	(b) (7)(E)						
ADRO							
OAR	Cases Received	6	35	12	29	8	6
	Cases Closed (FD)	5	32	11	32	10	3



Open Audits

As of 2/27/2019
(Confidential and Sensitive)

			<u>Date of Last Action</u>	<u>Audit Manager</u>	<u>Report Track</u>
Interim/Preliminary Report Writing					
2016	THE 2016 COMMITTEE	C00569905	11/15/2018	Favin	B
Total - 1					
Interim/Preliminary Audit Report Committee Response Period					
2016	TENNESSEE DEMOCRATIC PARTY	C00167346	02/06/2019	Burgess	B
2016	OKLAHOMA DEMOCRATIC PARTY	C00190934	02/06/2019	Morcomb	B
Total - 2					
Draft Final Audit Report Writing					
2016	AMBULATORY SURGERY CENTER ASSOCIATION PAC (ASCAPAC)	C00424788	12/18/2018	Pacious	B
2016	NEW JERSEY REPUBLICAN STATE COMMITTEE	C00164418	01/16/2019	Morcomb	B
Total - 2					
Proposed Final Audit Report Writing					
2016	TONY CARDENAS FOR CONGRESS	C00498873	02/14/2019	Smith	B
Total - 1					
Audits in OGC					
2016	SOUTH DAKOTA DEMOCRATIC PARTY	C00160937	IAR 11/19/2018	Favin	B
2016	MISSISSIPPI REPUBLICAN PARTY	C00084368	IAR 02/15/2019	Pacious	B
Total - 2					
Audits with the Commission					
2016	HALL FOR CONGRESS	C00497859	ADRM 12/18/2018	Burgess	B
2016	JILL STEIN FOR PRESIDENT	C00581199	ADRM 02/14/2019	Burgess	B
Total - 2					



Open Audits

As of 2/27/2019
(Confidential and Sensitive)

10 Open Audits

Legend

Track A	Audits with <u>no</u> unresolved legal issues
Track B	State/Local Party audits with findings PAC audits with unresolved legal issues Authorized audits with unresolved legal issues
Track C	Audits with <u>no</u> findings
IAR	Interim Audit Report
PAR	Preliminary Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report
Text	If text is red, the report has not been sent to OGC for a legal analysis



Open Audits
As of 2/27/2019
(Confidential and Sensitive)

Audit Caseload

<u>Audit Manager</u>	<u>Number of Audits</u>	<u>Percent of Total Audits ¹</u>
Burgess	3	30%
Favin	2	20%
Morcomb	2	20%
Pacious	2	20%
Smith	1	10%
Totals	10	100%

¹ May not total 100% due to rounding

Comments

2016

Ambulatory Surgery Center Assoc. PAC (ASCAPAC)
(b) (5)

Hall for Congress
(b) (5)

Jill Stein for President
(b) (5)

Mississippi Republican Party
(b) (5)

New Jersey Republican State Committee
(b) (5)

Oklahoma Democratic Party
(b) (5)

South Dakota Democratic Party
(b) (5)

Tennessee Democratic Party
(b) (5)

The 2016 Committee
(b) (5)

Tony Cardenas for Congress
(b) (5)



Proposed Final Audit Report - Due Date

As of 2/27/2019

(Confidential and Sensitive)

		<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2016	JILL STEIN FOR PRESIDENT	Burgess	ADRM	Circulated to Commission	11/30/2016
2016	HALL FOR CONGRESS	Burgess	ADRM	Circulated to Commission	05/03/2017
2016	TONY CARDENAS FOR CONGRESS	Smith	PFAR	Report Writing	05/03/2017
2016	AMBULATORY SURGERY CENTER ASSOCIATION PAC (ASCAPAC)	Pacious	DFAR	Report Writing	11/29/2017
2016	NEW JERSEY REPUBLICAN STATE COMMITTEE	Lmorcomb	DFAR	Report Writing	11/29/2017
2016	OKLAHOMA DEMOCRATIC PARTY	Lmorcomb	IAR	Committee Response Period	11/29/2017
2016	SOUTH DAKOTA DEMOCRATIC PARTY	Favin	IAR	OGC Reviewing	11/29/2017
2016	TENNESSEE DEMOCRATIC PARTY	Burgess	IAR	Committee Response Period	01/26/2018
2016	THE 2016 COMMITTEE	Favin	IAR	Report Writing	11/29/2017
2016	MISSISSIPPI REPUBLICAN PARTY	Pacious	IAR	OGC Reviewing	01/26/2018

(b) (7)(E)



Proposed Final Audit Report - Due Date

As of 2/27/2019

(Confidential and Sensitive)

10 Open Audits

Legend

IAR	Interim Audit Report
PAR	Preliminary Audit Report
DFAR	Draft Final Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year: 10/01/2017 To: 09/30/2019

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY -2018	811	No, Treasurer ADR 714 Lone Star Committee	\$250.00	11/04/2017	\$250.00	01/23/2018	\$0.00	None		
	828	National Right To Life Political Action Committee Cockfield, Wayne	\$3,375.00	12/06/2017	\$3,375.00	12/06/2017	\$0.00	Conduct internal education program for employees or staff	03/06/2018	03/06/2018
								Develop a FEC Compliance Manual	03/06/2018	03/09/2018
	829	Adam Clayton Powell for Congress Weinstein, Mark J.	\$2,550.00	12/06/2017				File amended reports	12/06/2017	
								File future reports timely		
	830	Orentlicher for Congress Gabovitch, David S.	\$2,150.00	12/17/2017	\$2,150.00	12/12/2017	\$0.00	Meet with RAD staff	12/17/2017	01/09/2018
	831	Combs, Bill 21st Century Democrats	\$5,850.00	01/03/2018	\$5,850.00	01/02/2018	\$0.00	Develop a FEC Compliance Manual	03/04/2018	
	832	Democratic Party Of New Mexico Lara, Robert	\$8,600.00	01/12/2018	\$8,600.00	11/14/2017	\$0.00	Attend FEC seminar	12/13/2018	12/01/2017
	833	National Right to Life Victory Fund Cockfield, Wayne	\$6,000.00	12/06/2017	\$6,000.00	12/06/2017	\$0.00	Conduct internal education program for employees or staff	03/06/2018	03/06/2018
								Develop a FEC Compliance Manual	03/06/2018	03/09/2018

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	835	Planned Parenthood Action Fund Inc. DBA Planned Parenthood Federal PAC Hubbard, Tshombe	\$2,600.00	02/16/2018	\$2,600.00	01/30/2018	\$0.00	Not Applicable		
	836	Lisker, Lisa Arizona Grassroots Action PAC	\$2,250.00	01/08/2018	\$2,250.00	01/24/2018	\$0.00	Develop a FEC Compliance Manual	03/07/2018	03/19/2018
	837	CITIZENS UNITED SUPER PAC LLC Catts, Lauren	\$5,850.00	01/24/2018	\$5,850.00	02/26/2018	\$0.00	Other	02/22/2018	
	838	Marston, Christopher M. Stutzman for Senate	\$8,340.00	04/05/2018	\$8,340.00	04/16/2018	\$0.00	Committee will file for termination		
	840	Democratic Party of Arkansas Vandiver, Dawne	\$10,400.00	02/20/2019				Attend FEC seminar File amended reports	02/20/2019 06/20/2018	
	841	Michigan Democratic State Central Committee O'Brien, Sandy	\$8,600.00	03/22/2018	\$8,600.00	04/11/2018	\$0.00	Attend FEC seminar File amended reports	02/20/2019 06/20/2018	
	842	Arizona Republican Party Lettieri, Bob	\$23,000.00	06/30/2018	\$23,000.00	06/20/2018	\$0.00	Attend FEC seminar File amended reports	02/20/2019 04/22/2018	04/20/2018
	843	Himpler, Bill American Financial Services Association PAC Himpler, Bill American Financial Services Association PAC	\$11,000.00	03/05/2018	\$11,000.00	01/03/2018	\$0.00	Conduct & certify internal audit/reconciliation	02/01/2019 02/01/2020	

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	844	Jimmy Gomez for Congress Hodge, Mary	\$2,400.00	03/05/2018	\$2,400.00	02/28/2018	\$0.00	Develop a FEC Compliance Manual	05/01/2018	07/19/2018
	845	Planned Parenthood Advocates of Wisconsin Political Fund Barnes, Mel	\$5,850.00	03/07/2018	\$5,850.00	04/04/2018	\$0.00	Attend FEC seminar	03/07/2019	
	848	Spies, Charles R., Esq. Right to Rise USA	\$2,100.00	04/20/2018	\$2,100.00	04/11/2018	\$0.00	Attend FEC seminar	03/22/2019	
	849	Backer, Dan The Committee to Defend the President	\$3,700.00	04/20/2018	\$3,700.00	04/05/2018	\$0.00	File amended reports	07/20/2018	07/31/2018
	850	The Loose Group Whelchel, John E.	\$3,800.00	05/04/2018	\$3,800.00	04/10/2018	\$0.00	Attend FEC seminar	04/04/2019	
	851	Al Lawson for Congress Session, Johnny Frank	\$2,650.00	10/07/2018	\$2,650.00	10/29/2018	\$0.00	Attend FEC seminar	09/07/2019	
	853	Hispanic Victory PAC Decker, Gustavo	\$7,600.00	08/15/2018	\$7,600.00	08/09/2018	\$0.00	None		
	854	Make America Great Again Caldwell, Leslie	\$3,375.00	05/11/2018	\$3,375.00	05/10/2018	\$0.00	File amended reports	06/11/2018	
	855	Utah Republican Party Young, Abram O.	\$7,800.00	05/16/2019				Attend FEC seminar File amended reports	05/16/2019 08/16/2018	
	857	Minnesota Democratic Farmer Labor Party Morales, Tyler	\$2,500.00	06/01/2018	\$2,500.00	09/05/2018	\$0.00	Attend FEC seminar	05/02/2019	
	860	Edward Jones PAC Hill, Jesse	\$4,000.00	08/15/2018	\$4,000.00	08/03/2018	\$0.00	Attend FEC seminar	07/16/2019	

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	863	Americans Deserve Better PAC, Inc Neale, Geoffrey J.	\$2,000.00	08/24/2018	\$2,000.00	07/27/2018	\$0.00	Committee will file for termination	09/23/2018	
	864	Nevada Republican Central Committee Bertrand, Michael J.	\$5,000.00	09/30/2018	\$5,000.00	09/14/2018	\$0.00	Attend FEC seminar	11/28/2018	09/05/2018
	866	Robinson, Eric Conservatives United	\$2,650.00	08/15/2018	\$2,650.00		\$0.00	Attend FEC seminar	07/16/2019	
	867	Working for Us Political Action Committee Inc. Rosenthal, Steven	\$6,600.00	08/18/2018	\$6,600.00	08/14/2018	\$0.00	Other	08/18/2018	07/31/2018
	868	National Nurses United for Patient Protection Kuhl, Martha	\$3,500.00	10/20/2018	\$3,500.00	10/16/2018	\$0.00	Attend FEC seminar	09/20/2019	
	869	MOVEON.ORG Political Action Matzzie, Tom	\$1,575.00	09/28/2018	\$1,575.00	09/05/2018	\$0.00	Other	09/28/2018	
	870	Eugene Ludwig	\$3,700.00	08/09/2018	\$3,700.00	07/24/2018	\$0.00	Other		
	876	National Association of Insurance and Financial Advisors Political Action Comm Tassey, Matthew S.	\$3,800.00	10/13/2018	\$3,800.00	09/18/2018	\$0.00	Attend FEC seminar	09/13/2019	10/04/2018
Sub-Total : FY -2018			\$175,415.00		\$154,665.00		\$0.00			
FY -2019	821	Kind For Congress Committee Smith, Brent	\$5,800.00	03/13/2019				Attend FEC seminar	02/11/2020	
	852	American Principles Laor, Eytan	\$5,000.00	12/19/2018	\$5,000.00	11/20/2018	\$0.00	Attend FEC seminar	11/19/2019	
								File amended reports	01/18/2019	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	865	Rights & Democracy Action Stockinger, Peri	\$1,250.00	11/03/2018	\$1,250.00	10/15/2018	\$0.00	Committee will file for termination	12/03/2018	10/12/2018
	871	Equality Pennsylvania Dungee, Joseph	\$5,900.00	10/18/2020				Attend FEC seminar	10/18/2019	
	873	Urban Victory Fund (UVF) Kinchen, Drue	\$750.00	11/17/2018	\$750.00	11/01/2018	\$0.00	Attend FEC seminar File amended reports	10/18/2019 11/17/2018	
	874	Hornaday, Alexander Restore American Freedom and Liberty	\$2,650.00	12/26/2018				Conduct & certify internal audit/reconciliation	11/26/2019	
	882	Democratic Party of Arkansas Vandiver, Dawne	\$7,900.00	05/13/2019	\$7,900.00	02/05/2019	\$0.00	Attend FEC seminar	05/13/2019	
Sub-Total : FY -2019			\$29,250.00		\$14,900.00		\$0.00			
Grand Total :			\$204,665.00		\$169,565.00		\$0.00			



AF Performance Goals

Print Date: February 28, 2019

Selected Parameters:

Office: Both

Start Date: 10/01/2018

End Date: 12/31/2018

*Exception: YES



AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)_____
Processed						
2018	12G	AUTH	Y	10/25/2018	12/10/2018	
2018	12G	UNAUTH_M	Y	10/25/2018	12/10/2018	
2018	M10	P_UNAUTH	Y	10/20/2018	12/04/2018	
2018	Q3	H_S_P_UNAUTH	N	10/15/2018	11/27/2018	
2018	Q3	H_S_P_UNAUTH	Y	10/15/2018	11/26/2018	
2018	M9	P_UNAUTH	N	09/20/2018	10/29/2018	
2018	12P	AUTH	Y	08/30/2018	10/22/2018	
2018	12P	AUTH	Y	08/23/2018	10/22/2018	
2018	12P	AUTH	Y	08/16/2018	10/15/2018	
2018	12P	AUTH	Y	08/02/2018	10/01/2018	
Total AF Reports Processed			10			
Average Processing Days			49.40			
(b) (7)(E)						
Percentage to Goal			100.00%			

Processed - No committees

					Action Date	(b) (7)(E)
2018	12SGR	AUTH	Y	11/15/2018	12/17/2018	
2018	12GR	AUTH	Y	11/08/2018	12/11/2018	
2018	12SG	AUTH	Y	10/25/2018	12/04/2018	
2018	M10	P_UNAUTH	N	10/20/2018	11/29/2018	
2018	30SG	AUTH	N	09/06/2018	10/22/2018	
2018	12P	AUTH	Y	08/31/2018	10/22/2018	
2018	12P	AUTH	Y	08/25/2018	10/22/2018	
2018	M8	P_UNAUTH	N	08/20/2018	10/15/2018	
2018	12PR	AUTH	Y	08/16/2018	10/15/2018	
2018	12P	AUTH	Y	08/13/2018	10/09/2018	
2018	12P	AUTH	Y	08/09/2018	10/09/2018	
2018	12PR	AUTH	Y	08/02/2018	10/01/2018	



AF Performance Goals

(Confidential and Sensitive)

Total AF Reports Processed-No Committees	12
Average Processing Days	49.58
(b) (7)(E)	
Percentage to Goal	91.67%

Total AF Reports	22
Average Processing Days	49.50
(b) (7)(E)	
Percentage to Goal	95.45%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters
RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2018	Q1	3397	C00368415	08/08/2018	10/02/2018	55	Y
2018	Q2	3455	C00381517	11/01/2018	12/21/2018	50	Y
2018	Q2	3460	C00638825	10/25/2018	11/06/2018	12	Y
2018	Q2	3463	C00634873	10/29/2018	11/08/2018	10	Y
2018	Q2	3471	C00637728	10/30/2018	12/19/2018	50	Y

Total Challenges Processed 5

Average Processing Days 35.40

Total Reports Processed within 60 Days 5

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters



AF Performance Goals

Print Date: February 28, 2019

Selected Parameters:

Office:	Both
Start Date:	10/01/2018
End Date:	12/31/2018
*Exception:	YES



AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
Processed						
2018	12G	AUTH	Y	10/25/2018	12/10/2018	
2018	12G	UNAUTH_M	Y	10/25/2018	12/10/2018	
2018	M10	P_UNAUTH	Y	10/20/2018	12/04/2018	
2018	Q3	H_S_P_UNAUTH	N	10/15/2018	11/27/2018	
2018	Q3	H_S_P_UNAUTH	Y	10/15/2018	11/26/2018	
2018	M9	P_UNAUTH	N	09/20/2018	10/29/2018	
2018	12P	AUTH	Y	08/30/2018	10/22/2018	
2018	12P	AUTH	Y	08/23/2018	10/22/2018	
2018	12P	AUTH	Y	08/16/2018	10/15/2018	
2018	12P	AUTH	Y	08/02/2018	10/01/2018	

Total AF Reports Processed 10

Average Processing Days 49.40

(b) (7)(E)

Percentage to Goal 100.00%

Processed - No committees

					Action Date	(b) (7)(E)
2018	12SGR	AUTH	Y	11/15/2018	12/17/2018	
2018	12GR	AUTH	Y	11/08/2018	12/11/2018	
2018	12SG	AUTH	Y	10/25/2018	12/04/2018	
2018	M10	P_UNAUTH	N	10/20/2018	11/29/2018	
2018	30SG	AUTH	N	09/06/2018	10/22/2018	
2018	12P	AUTH	Y	08/31/2018	10/22/2018	
2018	12P	AUTH	Y	08/25/2018	10/22/2018	
2018	M8	P_UNAUTH	N	08/20/2018	10/15/2018	
2018	12PR	AUTH	Y	08/16/2018	10/15/2018	
2018	12P	AUTH	Y	08/13/2018	10/09/2018	
2018	12P	AUTH	Y	08/09/2018	10/09/2018	
2018	12PR	AUTH	Y	08/02/2018	10/01/2018	



AF Performance Goals

(Confidential and Sensitive)

Total AF Reports Processed-No Committees	12
Average Processing Days	49.58
(b) (7)(E)	
Percentage to Goal	91.67%

Total AF Reports	22
Average Processing Days	49.50
(b) (7)(E)	
Percentage to Goal	95.45%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters

RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2018	Q1	3397	C00368415	08/08/2018	10/02/2018	55	Y
2018	Q2	3455	C00381517	11/01/2018	12/21/2018	50	Y
2018	Q2	3460	C00638825	10/25/2018	11/06/2018	12	Y
2018	Q2	3463	C00634873	10/29/2018	11/08/2018	10	Y
2018	Q2	3471	C00637728	10/30/2018	12/19/2018	50	Y

Total Challenges Processed 5

Average Processing Days 35.40

Total Reports Processed within 60 Days 5

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

Administrative Fine Program
Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19 (12/31/18)
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$140,542	\$61,636

(b) (7)(E)



FEDERAL ELECTION COMMISSION
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April 30, 2019

MEMORANDUM

AGENDA DOCUMENT NO. X19-15
AGENDA ITEM
For the meeting of May 7, 2019

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista Roche *KJR*
Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2019 – 2nd Quarter Highlights (1/1/19 – 3/31/19) & FY Statistical Overview

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the 2nd quarter FY 2019 (1/1/19 – 3/31/19) and fiscal year statistical overview. The intent of this document is to provide an update of the workload and achieved results of the Office of Compliance on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during an upcoming Executive Session.

The attached **Appendix A** provides the Commission with second quarter highlights for each office and also a statistical overview of FY 2019 results and progression towards meeting the 2014-2019 Strategic Performance Goals adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled 'Proposed Final Audit Report – Due Date' which highlights the report

manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2019 statistics for meeting strategic performance goals related to the Administrative Fine Program. **Appendix F** (AF Penalties Assessed and Collected) shows the total amount of penalties assessed and collection rate for FY 2015 – 2019. (b) (7)(E)

(b) (7)(E)

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the overview.

Alternative Dispute Resolution Office (ADRO)

In the second quarter of FY 2019, the ADRO received 13 cases (6 from the Reports Analysis Division (RAD), 4 from the Office of General Counsel (OGC), and 3 from the Audit Division (Audit)). During this time period, the ADRO closed a total of 15 cases, 12 with approved negotiated settlements, 2 with approved recommendations to dismiss, and 1 in which the Commission did not approve the recommendation to dismiss. In the second quarter of FY 2019, the Commission assessed \$125,500 in civil penalties through approved negotiated settlements, and the office collected \$65,450.

(b) (7)(E)
(b) (7)(E) However, when the thirty-five day government closure is subtracted from processing times, ADRO circulated 100% of memoranda for a final vote within the strategic goal timeframe during the quarter.

During FY 2018, the Commission authorized ADRO to make contact with 6 committees who were the subject of outstanding 2014 election cycle audits and offer an opportunity to participate in the ADR process and terminate the audit process. All 6 committees elected to participate in ADR. ADRO worked with staff from RAD, Audit, Information Division (Information) and OGC to develop and implement a new educational program tailored to each committee. During the second quarter of FY 2019, the Negotiated Settlements were approved by the Commission, and ADR staff began to develop and coordinate tailored educational sessions for each committee.

During the second quarter, ADRO conducted interviews for and filled the position of ADR Specialist (GS-11/12) to assist the office with managing its caseload and enhancing its operational efficiency.

Administrative Fine Program (Office of Administrative Review)

During the second quarter of FY 2019, the Commission processed 96 Reason to Believe (RTB) findings. OAR received 14 challenges and processed 12 Reviewing Officer Recommendations (ROR). The Commission reviewed final determination recommendations in 2 cases, made a final determination that the respondents in these cases violated

52 U.S.C. § 30104(a), and assessed \$7,550 in civil penalties. The Commission also collected \$63,662 in fine payments and prepared 2 cases for public release.

(b) (7)(E)

(b) (7)(E)

Additionally, OAR forwarded 92% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).²

Audit Division (Audit)

During the second quarter of FY 2019, the Audit Division (Audit) processed the following audit reports:

	Audit Report Stage	Number of Reports
Released to Public	Final Audit Report	3
Sent to the Committee	Interim Audit Report	3
	Draft Final Audit Report	1
Circulated to the Commission	Interim Audit Report	1
	Audit Division Recommendation Memorandum	1
	Proposed Final Audit Report	1
Forwarded to OGC	Interim Audit Report	1
	Draft Final Audit Report	1
	Audit Division Recommendation Memorandum	1
	Total # of Audit Reports	13

Audit has a total of 11 open audits. Seven of these audits are unauthorized committees and four are authorized committees. The four authorized audits are in the pre-audit stage. The Commission approved these committees for audit on April 23, 2019. Audit Notification Letters were sent to the committees on April 25, 2019. The unauthorized committees are audits from the 2016 election cycle – of these, one audit is in the interim report writing stage, three audits are awaiting committee responses, one audit is the draft final report writing stage, one audit is in the proposed report writing stage and one audit is with the Commission awaiting approval.

Audit remains focused on turnaround times to ensure that the average time for key stages within the audit process are as efficient as possible. In fact, the division has completed and publically released all 2016 Authorized and Title 26 Presidential audits. Audit has been able to reduce pre-audit, fieldwork and interim audit report writing turnaround times for the 2016 Title 52

(b) (7)(E)

² OAR processed 11 of 12 RORs within 60 days. The government shutdown delayed the processing of 1 ROR.

committees by 72 days, when compared to the 2014 cycle³ (outlined in the chart below). (b) (7)(E)
(b) (7)(E)

(b) (7)(E)

With respect to the Presidential Election Campaign Fund (PECF), Audit continued forwarding the monthly PECF reports received from the U.S. Treasury, to the Office of Chief Information Officer (OCIO) for web placement. Audit consulted the OCIO's Compliance Advice Team and finalized updates to the Federal Register notice regarding the submission dates for the 2020 presidential cycle.

Audit staff attended annual training for the FEC Audit Division Quality Standards on February 27, 2019. Additionally, Audit management identified core training competencies and oversaw training and completion of Continuing Professional Education requirements during the quarter.

Reports Analysis Division (RAD)

During the second quarter of FY 2019, RAD collaborated with OCIO and Information on the development of an "Other Filers" section of the FEC website. We are currently working on developing reporting scenarios for nationwide filers to be posted in the near future. Further, RAD partnered with the Electronic Filing Office on updates to the Password Assignment System to increase security measures. The updated system was rolled out in April and all electronic filers were notified via email.

RAD staff reviewed a total of 27,913 documents totaling 4,880,784 pages during the second quarter of FY 2019 and 86.6% of the reports were reviewed within 90 days of receipt for the 2018 election cycle. RAD generated and sent 2,285 letters to the filing community and 80% of RIAs were sent within 40 days of the report review date. Also during the second quarter, RAD generated 11 referrals (6 ADRs, 5 Administrative Fines) and sent 984 non-filer notices. Finally, during the second quarter, the Reports Processing Branch coded 5,566,577 transactions, 1,429 documents and processed 12,549 pages from 1,359 documents in the Paper Automation system.

RAD welcomed six new Campaign Finance Analysts (CFA) during the second quarter; however, we currently have six CFA vacancies. In addition, one CFA is on a detail to the OCIO

³ See the document Audit Division Key Audit Stages within the (b) (7)(E) for an overview of average days for all key stages as of 4/29/19.

and another is on administrative leave. We were previously approved to fill four CFA positions, but were unable to fill three of them with our last posting and we lost one candidate due to the shutdown. Further, due to a recent CFA resignation, and a CFA transfer to ADRO, we recently requested approval to fill two additional vacancies. We intend to post again in the near future and would like to be able to fill all of the CFA vacancies so we are fully staffed for the 2020 election cycle.

Finally, despite a staff shortage and losing a month as a result of the shutdown, RAD staff worked hard to meet its goal of sending audit referrals to Audit timely, in order to meet the statutory requirement of commencing the audits within 6 months of the general election. We are in the process of finishing up the review from the 2018 cycle and will be making audit referral assessments for party committees and PACs during the next quarter.

Attachments

Appendix A, FY 2019 Highlights and FY Overview for Office of Compliance Goals


Appendix B, Open Audits Report

Appendix C, Proposed Final Audit Report - Due Date

Appendix D, ADR Civil Penalty Report

Appendix E, AF Performance Goals Report

Appendix F, AF Penalties Assessed and Collected



Status of Compliance

FY 2019
(10/1/2018 - 3/31/2019)



Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19 (3/31/19)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%	92.6%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	99.0%	99%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2019 Performance Goals	Status 3/31/19
RAD staff collaborated with OCIO and the Information Division on the development of IE reporting examples and the creation of an “Other Filers” section for the FEC website.	The “Other Filers” section and the IE reporting examples were posted on the website in February and March 2019.
RAD staff collaborated with ADRO, Audit and the Information Division on the development of training materials for the 2014 cycle Audit/ADRO Education Committees.	Training sessions were scheduled and held in April and May 2019.
RAD staff collaborated with the Electronic Filing Office to update the Password Assignment System in order to add extra security measures.	The updated Password Assignment System was rolled out on 4/3/2019. All electronic filers were made aware of the changes via email.

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 2: Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs

Performance Goals	FY 14	FY 15	FY 16	FY 17	FY 18	FY 19 (3/31/19)
RAD to review 75% of reports within 90 days of receipt	85.4%	79.3%	92.9%	76.6%	92.2%	80.6%
RAD to send 75% of RFAs within 40 days of report review	84%	92%	92%	88%	88%	85%
(b) (7)(E)	96.8%	93.5%	100%	96.2%	96.9%	84.9%
(b) (7)(E)	93%	43%	56%	25%	45%	100%
OAR to circulate 60% of Reviewing Officer Recommendations within 60 days	100%	97%	81.8%	96.67%	100%	94.12%
(b) (7)(E)	95%	100%	100%	100%	99%	22%/100%

Strategic Objective 4: Foster a Culture of High Performance

Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 14	FY 15	FY 16	FY 17	FY 18	FY 19 (3/31/19)
RAD	Documents/ Transactions Coded	N/A	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	9,125/ 30,869,828	3,413/ 15,473,982
	Documents/Pages Processed in Paper Automation System	N/A	N/A	N/A	8,139/ 684,747	8,822/ 902,572	3,279/ 32,255
	Documents/Pages Reviewed	68,282/ 9,211,502	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	52,179/ 12,833,405
	Letters sent	10,220	13,433	13,253	14,796	13,763	7,283
	Telephone calls handled	10,673	11,822	12,362	11,634	13,036	6,776
	Referrals	59	91	43	95	46	17
	AF Cases RTB/FD	70/55	191/159	83/33	163/168	95/23	179/11
Audit	(b) (7)(E)						
ADRO							
OAR	Cases Received	6	35	12	29	8	20
	Cases Closed (FD)	5	32	11	32	10	4



Open Audits

As of 4/30/2019

(Confidential and Sensitive)

			<u>Date of Last Action</u>	<u>Audit Manager</u>	<u>Report Track</u>
Pre-Audit					
2018 VAN DREW FOR CONGRESS	C00651868		04/25/2019	Burgess	B
2018 MIKE BRAUN FOR INDIANA	C00853147		04/25/2019	Morcomb	B
2018 STEVE CHABOT FOR CONGRESS	C00301838		04/25/2019	Smith	B
2018 DR. PAUL RUIZ FOR CONGRESS	C00502575		04/25/2019	Smith	B
				Total - 4	
Interim/Preliminary Report Writing					
2016 THE 2016 COMMITTEE	C00569905		11/15/2018	Favin	B
				Total - 1	
Interim/Preliminary Audit Report Committee Response Period					
2016 SOUTH DAKOTA DEMOCRATIC PARTY	C00160937		03/28/2019	Favin	B
				Total - 1	
Draft Final Audit Report Writing					
2018 TENNESSEE DEMOCRATIC PARTY	C00167348		03/26/2019	Burgess	B
				Total - 1	
Draft Final Audit Report Committee Response Period					
2016 AMBULATORY SURGERY CENTER ASSOCIATION PAC (ASCAPAC)	C00424788		04/15/2019	Pacios	B
2016 OKLAHOMA DEMOCRATIC PARTY	C00190934		04/29/2019	Morcomb	B
				Total - 2	
Proposed Final Audit Report Writing					
2016 NEW JERSEY REPUBLICAN STATE COMMITTEE	C00164418		04/25/2019	Morcomb	B
				Total - 1	
Audits with the Commission					
2016 MISSISSIPPI REPUBLICAN PARTY	C00084368	IAR	04/24/2019	Pacios	B
				Total - 1	



Open Audits

As of 4/30/2019
(Confidential and Sensitive)

11 Open Audits

Legend

Track A	Audits with <u>no</u> unresolved legal issues
Track B	State/Local Party audits with findings PAC audits with unresolved legal issues Authorized audits with unresolved legal issues
Track C	Audits with <u>no</u> findings
IAR	Interim Audit Report
PAR	Preliminary Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report
Text	If text is red, the report has not been sent to OGC for a legal analysis



Open Audits

As of 4/30/2019

(Confidential and Sensitive)

Audit Caseload

<u>Audit Manager</u>	<u>Number of Audits</u>	<u>Percent of Total Audits ¹</u>
Burgess	2	18%
Favin	2	18%
Murcomb	3	27%
Pacioux	2	18%
Smith	2	18%
Totals	11	100%

¹ May not total 100% due to rounding.



Open Audits

As of 4/30/2019

{Confidential and Sensitive}

Comments

2016

Ambulatory Surgery Center Assoc. PAC (ASCAPAC)

(b) (5)

Mississippi Republican Party

(b) (5)

New Jersey Republican State Committee

(b) (5)

Oklahoma Democratic Party

(b) (5)

South Dakota Democratic Party

(b) (5)

Tennessee Democratic Party

(b) (5)

The 2016 Committee

(b) (5)

2018

Dr. Raul Ruiz for Congress

(b) (5)

Mike Braun for Indiana

(b) (5)

Steve Chabot for Congress

(b) (5)

Van Drew for Congress

(b) (5)



Proposed Final Audit Report - Due Date

As of 4/30/2019

(Confidential and Sensitive)

	<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2016 AMBULATORY SURGERY CENTER ASSOCIATION PAC (ASCAPAC)	Paciou	DFAR	Committee Response Period	11/29/2017
2016 NEW JERSEY REPUBLICAN STATE COMMITTEE	Lmorcomb	PFAR	Report Writing	11/29/2017
2016 OKLAHOMA DEMOCRATIC PARTY	Lmorcomb	DFAR	Committee Response Period	11/29/2017
2016 SOUTH DAKOTA DEMOCRATIC PARTY	Favin	IAR	Committee Response Period	11/29/2017
2016 TENNESSEE DEMOCRATIC PARTY	Burgess	DFAR	Report Writing	01/26/2018
2016 THE 2016 COMMITTEE	Favin	IAR	Report Writing	11/29/2017
2016 MISSISSIPPI REPUBLICAN PARTY	Paciou	IAR	Circulated to Commission	01/26/2018
2018 STEVE CHABOT FOR CONGRESS	Smith		Pre-Audit	04/25/2019
2018 DR. RAUL RUIZ FOR CONGRESS	Smith		Pre-Audit	04/25/2019
2018 MIKE BRAUN FOR INDIANA	Lmorcomb		Pre-Audit	04/25/2019
2018 VAN DREW FOR CONGRESS	Burgess		Pre-Audit	04/25/2019

(b) (7)(E)



Proposed Final Audit Report - Due Date

As of 4/30/2019

(Confidential and Sensitive)

11 Open Audits

Legend

IAR	Interim Audit Report
PAR	Preliminary Audit Report
DFAR	Draft Final Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year 10/01/2017 to 09/30/2019

Period	Casest	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY-2018	811	No. Treasurer ADR 714 Lone Star Committee	\$250.00	11/04/2017	\$250.00	21/23/2018	\$0.00	None		
	828	National Right To Life Political Action Committee Cockfield, Wayne	\$3,375.00	12/05/2017	\$3,375.00	12/05/2017	\$0.00	Conduct internal education program for employees or staff	03/06/2018	03/06/2018
								Develop a FEC Compliance Manual	03/08/2018	03/08/2018
	829	Adam Clayton Powell for Congress Wrenster, Marc J	\$2,550.00	12/05/2017				File amended reports	12/05/2017	
								File future reports timely		
	830	Gendricher for Congress Gabovitch, David S	\$2,150.00	12/17/2017	\$2,150.00	12/12/2017	\$0.00	Meet with RAD staff	12/17/2017	01/09/2018
	831	Corros, Bl 21st Century Democrats	\$5,850.00	01/03/2018	\$5,850.00	01/02/2018	\$0.00	Develop a FEC Compliance Manual	03/04/2018	
	832	Democratic Party Of New Mexico Lara, Robert	\$8,600.00	01/12/2018	\$8,600.00	11/14/2017	\$0.00	Attend FEC seminar	12/13/2018	12/04/2017
	833	National Right to Life Victory Fund Cockfield, Wayne	\$5,000.00	12/05/2017	\$5,000.00	12/05/2017	\$0.00	Conduct internal education program for employees or staff	03/06/2018	03/06/2018
								Develop a FEC Compliance Manual	03/05/2018	03/05/2018

Period	Cases	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	835	Planned Parenthood Action Fund Inc. DBA Planned Parenthood Federal PAC Hubbard, Tshombe	\$2,600.00	02/15/2018	\$2,600.00	01/30/2018	\$0.00	Not Applicable		
	836	Lisker, Lisa Arizona Grassroots Action PAC	\$2,250.00	01/28/2018	\$2,250.00	01/24/2018	\$0.00	Develop a FEC Compliance Manual	03/27/2018	03/19/2018
	837	CITIZENS UNITED SUPER PAC LLC Catts, Lauren	\$5,850.00	01/24/2018	\$5,850.00	02/26/2018	\$0.00	Other	02/22/2018	
	838	Marston, Christopher M Stutzman for Senate	\$8,340.00	04/05/2018	\$8,340.00	04/16/2018	\$0.00	Committee will file for termination		
	840	Democratic Party of Arkansas Vandiver, Dawnie	\$10,400.00	02/20/2019	\$10,400.00	04/11/2019	\$0.00	Attend FEC seminar File amended reports	02/20/2019 08/20/2018	
	841	Michigan Democratic State Central Committee O'Brien, Sandy	\$8,500.00	03/22/2018	\$8,500.00	04/11/2018	\$0.00	Attend FEC seminar File amended reports	02/20/2019 09/20/2018	
	842	Arizona Republican Party Lentier, Bob	\$23,000.00	06/30/2018	\$23,000.00	06/20/2018	\$0.00	Attend FEC seminar File amended reports	02/20/2019 04/22/2018	 04/20/2018
	843	Amper, Br American Financial Services Association PAC Amper, Br American Financial Services Association PAC	\$11,000.00	03/05/2018	\$11,000.00	01/23/2018	\$0.00	Conduct & certify internal audit/reconciliation	02/01/2019 02/01/2020	

Period	Casell	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	844	Jimmy Gomez for Congress Hodge, Mary	\$2,400.00	03/05/2018	\$2,400.00	02/28/2018	\$0.00	Develop a FEC Compliance Manual	06/01/2018	07/19/2018
	845	Planned Parenthood Advocates of Wisconsin II Political Fund Barnes, Mel	\$5,550.00	03/07/2018	\$5,550.00	04/04/2018	\$0.00	Attend FEC seminar	03/07/2018	03/27/2018
	848	Spies, Charles R., Esq. Right to Rise USA	\$2,100.00	04/20/2018	\$2,100.00	04/11/2018	\$0.00	Attend FEC seminar	03/27/2019	
	849	Backer, Dan The Committee to Defend the President	\$3,700.00	04/23/2018	\$3,700.00	04/05/2018	\$0.00	File amended reports	07/20/2018	07/31/2018
	850	The Loose Group Whelchel, John E	\$3,800.00	05/04/2018	\$3,800.00	04/10/2018	\$0.00	Attend FEC seminar	04/04/2019	02/27/2019
	851	Al Lawson for Congress Skewton, Johnny Frank	\$2,650.00	10/07/2018	\$2,650.00	10/29/2018	\$0.00	Attend FEC seminar	05/07/2019	
	853	Hispanic Victory PAC Decker, Gustavo	\$7,600.00	08/16/2018	\$7,600.00	08/09/2018	\$0.00	None		
	854	Make America Great Again Cudweil, Leslie	\$3,375.00	06/11/2018	\$3,375.00	06/10/2018	\$0.00	File amended reports	06/11/2018	
	855	Utah Republican Party Young, Abram D.	\$7,800.00	06/18/2019				Attend FEC seminar File amended reports	06/16/2019 06/16/2018	
	857	Minnesota Democratic Farmer Labor Party Morales, Tyler	\$7,500.00	06/01/2018	\$7,500.00	05/05/2018	\$0.00	Attend FEC seminar	05/02/2019	
	860	Edward Jones PAC Hill, Jesse	\$4,000.00	08/15/2018	\$4,000.00	08/03/2018	\$0.00	Attend FEC seminar	07/16/2019	04/04/2019

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	863	Americans Deserve Better PAC Inc. Neale, Geoffrey J.	\$2,000.00	06/24/2018	\$2,000.00	07/27/2018	\$0.00	Committee will file for termination	09/23/2018	
	864	Nevada Republican Central Committee Bertrand, Michael J.	\$5,000.00	09/30/2018	\$5,000.00	09/14/2018	\$0.00	Attend FEC seminar	11/28/2018	09/05/2018
	866	Robinson, Eric Conservatives United	\$2,650.00	06/15/2018	\$2,650.00	07/18/2018	\$0.00	Attend FEC seminar	07/15/2019	
	867	Working for Us Political Action Committee Inc. Rosenthal, Steven	\$6,600.00	08/13/2018	\$6,600.00	08/14/2018	\$0.00	Other	08/18/2018	07/31/2018
	868	National Nurses United for Patient Protection Kiss, Martha	\$3,500.00	10/20/2018	\$3,500.00	10/19/2018	\$0.00	Attend FEC seminar	02/20/2019	
	869	MOVEON.ORG Political Action Maschke, Tom	\$1,575.00	09/28/2018	\$1,575.00	09/05/2018	\$0.00	Other	09/28/2018	
	870	Eugene Ludwig	\$3,700.00	08/23/2018	\$3,700.00	07/24/2018	\$0.00	Other		
	876	National Association of Insurance and Financial Advisors Political Action Comm Tassery, Matthew S.	\$3,800.00	10/13/2018	\$3,800.00	09/18/2018	\$0.00	Attend FEC seminar	09/13/2019	10/04/2018
Sub-Total : FY-2018			\$175,415.00		\$165,065.00		\$0.00			
FY-2019	821	Kind For Congress Committee Smith, Brett	\$5,800.00	03/13/2019	\$5,800.00	03/13/2019	\$0.00	Attend FEC seminar	02/11/2020	
	852	American Principles Ladd, Eylan	\$5,000.00	12/19/2018	\$5,000.00	11/20/2018	\$0.00	Attend FEC seminar File amended reports	11/19/2019 01/18/2019	

Period	Casest	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	858	Watson, Howard Independence USA PAC	\$4,000.00	03/05/2018	\$4,000.00	02/29/2019	\$0.00	None		
	866	Rights & Democracy Action Stockinger, Per.	\$1,250.00	11/03/2018	\$1,250.00	10/15/2018	\$0.00	Committee will file for termination	12/03/2018	10/12/2018
	871	Equality Pennsylvania Dyngen, Joseph	\$5,900.00	10/18/2020				Attend FEC seminar	10/18/2019	
	873	Urban Victory Fund (UVF) Kinchen, Dru	\$750.00	11/17/2018	\$750.00	11/01/2019	\$0.00	Attend FEC seminar File amended reports	10/18/2019 11/17/2018	
	874	Monday, Alexander Restore American Freedom and Liberty	\$2,850.00	12/20/2018				Conduct & certify internal audit/reconciliation	11/20/2019	
	877	Arizona Republican Party Lentini, Bob	\$45,000.00	11/13/2019	\$10,000.00	04/09/2019	\$35,000.00	File amended reports Meet with RAO staff	05/12/2019 05/12/2018	
	878	Crute, Bradley M. Perdue for Senate	\$30,000.00	03/11/2019	\$30,000.00	03/08/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2018	
	879	Michigan Democratic State Central Committee O'Brien, Sandy	\$7,750.00	03/11/2019	\$7,750.00	03/12/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	
	880	Massachusetts Democratic State Committee Yorliss, Paul G	\$7,050.00	03/11/2019	\$7,050.00	04/01/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	881	Democratic Party of South Carolina George, Veiva E.	\$9,000.00	08/12/2019				Attend FEC seminar	05/13/2019	
								File amended reports	05/13/2019	
	882	Democratic Party of Arkansas Wardlaw, Deane	\$7,500.00	06/13/2019	\$7,500.00	04/05/2019	\$0.00	Attend FEC seminar	05/13/2019	
	885	Katy for Congress Pogo, Fred H.	\$1,900.00	04/05/2019	\$1,900.00	03/26/2019	\$0.00	Attend FEC seminar	03/07/2020	
	887	Garraputo, Holly Joan Higgins for Congress	\$3,100.00	04/13/2019	\$3,100.00	03/22/2019	\$0.00	Conduct internal education program for employees or staff	05/13/2019	
	883	Manzanita Policy Project PAC Murphy, Don	\$4,000.00	04/13/2019	\$4,000.00	04/09/2019	\$0.00	Committee will file for termination	05/13/2019	
Sub-Total: FY-2019			\$141,050.00		\$88,500.00		\$35,000.00			
Grand Total:			\$216,465.00		\$253,565.00		\$35,000.00			



AF Performance Goals

Print Date: April 30, 2019

Selected Parameters:

Office: Both

Start Date: 10/01/2018

End Date: 03/31/2019

*Exception: YES



AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date
Processed					
2018	30G	UNAUTH	N	12/06/2018	03/19/2019
2018	30G	AUTH	N	12/06/2018	02/04/2019
2018	M11	P_UNAUTH	N	11/20/2018	02/04/2019
2018	12G	UNAUTH_Q	Y	10/25/2018	03/12/2019
2018	12G	AUTH	Y	10/25/2018	12/10/2018
2018	12G	UNAUTH_M	Y	10/25/2018	12/10/2018
2018	M10	P_UNAUTH	Y	10/20/2018	12/04/2018
2018	Q3	H_S_P_UNAUTH	N	10/15/2018	11/27/2018
2018	Q3	H_S_P_UNAUTH	Y	10/15/2018	11/26/2018
2018	M9	P_UNAUTH	N	09/20/2018	10/29/2018
2018	12P	AUTH	Y	08/30/2018	10/22/2018
2018	12P	AUTH	Y	08/23/2018	10/22/2018
2018	12P	AUTH	Y	08/16/2018	10/15/2018
2018	12P	AUTH	Y	08/02/2018	10/01/2018

Total AF Reports Processed 14

Average Processing Days 62.21

(b) (7)(E)

Percentage to Goal 78.57%

Processed - No committees

					Action Date
2018	30GR	AUTH	N	01/30/2019	02/11/2019
2018	30SGR	AUTH	N	12/27/2018	02/11/2019
2018	30GR	AUTH	N	12/20/2018	02/11/2019
2018	M12	P_UNAUTH	N	12/20/2018	02/11/2019
2018	30SG	AUTH	N	12/06/2018	02/04/2019
2018	12GR	AUTH	Y	11/26/2018	02/04/2019
2018	12SGR	AUTH	Y	11/15/2018	12/17/2018
2018	12GR	AUTH	Y	11/09/2018	12/11/2018
2018	12SG	AUTH	Y	10/25/2018	12/04/2018

(b) (7)(E)



AF Performance Goals

(Confidential and Sensitive)

Processed - No committees

Report Year	Report Description	Report Type	Status	Start Date	Action Date
2018	M10	P_UNAUTH	N	10/20/2018	11/29/2018
2018	30SG	AUTH	N	09/06/2018	10/22/2018
2018	12P	AUTH	Y	08/31/2018	10/22/2018
2018	12P	AUTH	Y	08/25/2018	10/22/2018
2018	M8	P_UNAUTH	N	08/20/2018	10/15/2018
2018	12PR	AUTH	Y	08/18/2018	10/15/2018
2018	12P	AUTH	Y	08/13/2018	10/09/2018
2018	12P	AUTH	Y	08/09/2018	10/09/2018
2018	12PR	AUTH	Y	08/02/2018	10/01/2018
2019	12GR	AUTH	Y	12/27/2018	02/25/2019

(b) (7)(E)

Total AF Reports Processed-No Committees	19
Average Processing Days	51.16
Percentage to Goal	89.47%

(b) (7)(E)

Total AF Reports	33
Average Processing Days	55.85
Percentage to Goal	84.85%

(b) (7)(E)

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters
 RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters
 processed are those that have a RTB Circ Date or a status of processed-no committees. does NOT include report type 48H
 sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YLS is selected, the 2013 M8 process date is adjusted to 10/18/13



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rpt Date	ROR Circ Date	# Days	Within 60 Days
2018	Q1	3397	C00358415	08/08/2018	10/02/2018	55	Y
2018	Q2	3455	C00381517	11/01/2018	12/21/2018	50	Y
2018	Q2	3460	C00538825	10/25/2018	11/06/2018	12	Y
2018	Q2	3463	C00634873	10/29/2018	11/08/2018	10	Y
2018	Q2	3471	C00637728	10/30/2018	12/19/2018	50	Y
2018	12P	3487	C00660126	11/13/2018	02/05/2019	84	N
2018	M9	3489	C00147231	12/18/2018	02/14/2019	58	Y
2018	Q3	3496	C00579068	02/01/2019	03/27/2019	54	Y
2018	Q3	3501	C00131706	01/28/2019	03/29/2019	60	Y
2018	Q3	3519	C00688137	02/05/2019	03/12/2019	35	Y
2018	Q3	3526	C00641035	01/28/2019	03/22/2019	53	Y
2018	Q3	3528	C00661173	01/28/2019	03/15/2019	46	Y
2018	Q3	3533	C00634873	01/28/2019	03/13/2019	44	Y
2018	Q3	3544	C00614305	01/28/2019	03/13/2019	44	Y
2018	M10	3547	C00147231	01/31/2019	02/14/2019	14	Y
2018	12G	3552	C00147231	01/31/2019	02/14/2019	14	Y
2018	48H	3562	C00647081	01/28/2019	03/27/2019	58	Y



AF Performance Goals

(Confidential and Sensitive)

Total Challenges Processed	17
Average Processing Days	43.59
Total Reports Processed within 60 Days	16
Percentage to Goal	94.12%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

Administrative Fine Program Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19 (3/31/19)
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$128,464	\$60,721

(b) (7)(E)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2019 JUL 31 PM 12:13

SENSITIVE

July 31, 2019

AGENDA DOCUMENT NO. X19-31

AGENDA ITEM

For meeting of **August 20, 2019**

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista Roche *KR*
Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Dayna C. Brown *DB*
Acting Assistant Staff Director
Audit Division

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2019 – 3rd Quarter Highlights (4/1/19 – 6/30/19) & FY Statistical Overview

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the 3rd quarter FY 2019 (4/1/19 – 6/30/19) and fiscal year statistical overview. The intent of this document is to provide an update of the workload and achieved results of the Office of Compliance on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during an upcoming Executive Session.

The attached **Appendix A** provides the Commission with third quarter highlights for each office and also a statistical overview of FY 2019 results and progression towards meeting the goals outlined within the 2018-2022 Strategic Plan adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled "Proposed Final Audit Report – Due Date" which highlights the report manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2019 statistics for meeting strategic performance goals related to the Administrative Fine Program. **Appendix F** (AF Penalties Assessed and Collected) shows the total amount of penalties assessed and collection rate for FY 2015 – 2019. Please note, additional materials concerning the Audit Division are also available (b) (7)(E)

(b) (7)(E)

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the overview.

Alternative Dispute Resolution Office (ADRO)

In the third quarter of FY 2019, the ADRO received 9 cases (4 from the Reports Analysis Division (RAD) and 5 from the Office of General Counsel (OGC)). During this time period, the ADRO closed a total of 6 cases, 5 with approved negotiated settlements and 1 with an approved recommendation to dismiss. In the third quarter of FY 2019, the Commission assessed \$31,530 in civil penalties through approved negotiated settlements, and the office collected \$71,480 in penalties.

(b) (7)(E)

During FY 2018, the Commission authorized ADRO to make contact with 6 committees who were the subject of outstanding 2014 election cycle audits and offer an opportunity to participate in the ADR process and terminate the audit process. All 6 committees elected to participate in the ADR process. ADRO worked with staff from RAD, Audit Division, Information Division (Information) and OGC to develop and implement a new educational program tailored to each committee. During the previous quarter, all Negotiated Settlements were approved by the Commission and ADR staff began to develop and coordinate tailored educational sessions for each committee. During this quarter, Commission staff provided the approved tailored training. Additionally, the Committees completed their corrective action plans. Finally, the civil penalties were fully paid in 5 matters, with the remaining committee continuing to make payments under an approved payment plan.

Administrative Fine Program (Office of Administrative Review)

During the third quarter of FY 2019, the Commission processed 75 Reason to Believe (RTB) findings. OAR received 17 challenges and processed 15 Reviewing Officer Recommendations (ROR). The Commission reviewed final determination recommendations in

58 cases, made a final determination that the respondents in 54 cases violated 52 U.S.C. § 30104(a), and assessed \$142,519 in civil penalties. The Commission also collected \$147,873 in fine payments and prepared 53 cases for public release.

(b) (7)(E)

Additionally, OAR forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

Audit Division (Audit)

During the third quarter of FY 2019, the Audit Division (Audit) processed the following audit reports:

	Audit Report Stage	Number of Reports
Released to Public	Final Audit Report	3
Sent to the Committee	Interim Audit Report	1
	Draft Final Audit Report	2
Circulated to the Commission	Interim Audit Report	1
	Audit Division Recommendation Memorandum	2
	Proposed Final Audit Report	3
Forwarded to OGC	Interim Audit Report	1
	Draft Final Audit Report	2
	Audit Division Recommendation Memorandum	2
	Total # of Audit Reports	17

(b) (7)(E)

Audit has a total of 9 open audits. Five of these audits are unauthorized committees and four audits are authorized committees. All of the unauthorized committees are from the 2016 election cycle. The authorized committees are from the 2018 election cycle.

Audit received the 2018 unauthorized referrals from RAD on July 12, 2019. A total of twenty committees met the criteria for referral to Audit. Additionally, the Commission approved the 2018 Unauthorized Audit Program, Materiality Thresholds and Error Definitions on July 25, 2019. In mid-August 2019, Audit will circulate a recommendation memo on how to best handle the referred 2018 unauthorized committees.

Of the remaining 2016 unauthorized committees, all but one, (b) (7)(E)

Of the remaining 2016 unauthorized

committees – two are at the DFAR stage; one is at the PFAR stage; one is at the ADRM stage and one is at the IAR stage.

Audit remains focused on turnaround times to ensure that the average time for key stages within the audit process are as efficient as possible. Audit has been able to reduce the overall time within the majority of audit stages.

(b) (7) (E)

With respect to the Presidential Election Campaign Fund (PECF), Audit continued forwarding the monthly PECF reports received from the U.S. Treasury, to the Office of Chief Information Officer (OCIO) for web placement. Audit circulated, and the Commission subsequently approved, the Federal Register notice regarding the submission dates for the 2020 presidential cycle. (b) (5)

Audit management has been working with OPM on updating the GS-12 and GS-13 performance standards for the Auditor position. This process will be completed before the end of the year. Audit was also invited to present at the California Political Treasurers Conference on August 8, 2019 in Washington, DC. Audit will lose one of its most tenured auditors to retirement at the end of August. As such, Audit will be requesting to hire two new auditors to backfill for this position and other forecasted retirements.

Reports Analysis Division (RAD)

During the third quarter of FY 2019, RAD collaborated with OCIO and the Information Division on the development of party committee reporting scenarios and reporting scenarios for nationwide IEs. These reporting examples were posted on the website during the third quarter. We will continue to work on more complicated party committee reporting examples during the fourth quarter. In addition, RAD dedicated significant amount of time during the quarter collaborating with OCIO on the development of the NextGen efilng system, completing the development of Form 99 and currently focusing on the development of Form 3X. Also during the third quarter, the Reports Processing Branch transitioned from the Paper Automation System to an in-house Paper Conversion Process for paper filed reports, with RAD staff involved with both the development and implementation of this process.

RAD staff continued to feel the effects of the shutdown during the third quarter and worked diligently to get through the back log of the 2017-2018 cycle reports. Also during the third quarter, RAD began the review of 2019-2020 cycle reports. RAD staff reviewed a total of 19,638 documents totaling 16,960,873 pages during the third quarter of FY 2019 and 61% of the reports were reviewed within 90 days of receipt (2018 and 2020 election cycle reports). RAD generated and sent 2,099 letters to the filing community and 84% of RFAs were sent within 40 days of the report review date. Also during the third quarter, RAD generated 17 referrals (3 OGC, 4 ADRO, 6 Administrative Fines, and 4 Audit) and sent 356 non-filer notices. Finally, the Reports Processing Branch coded 2,260,320 transactions, 874 documents and processed 7,229 pages from 800 documents in the Paper Automation system.


RAD currently has six (6) Campaign Finance Analyst (CFA) vacancies, four (4) of which we have approval to fill and have recently posted. In addition, we have two (2) additional CFA vacancies, one CFA on a detail to the OCFO and another on administrative leave. We will be requesting approval to fill the additional CFA vacancies to ensure we are fully staffed for 2020. RAD worked with OPM to develop and finalize performance standards for the Data Disclosure Assistant positions, and to revise performance standards for the Secretary position. We are currently working on revising the Campaign Finance Analyst and Coding

Clerk performance standards with a goal of completing this process by the end of the year. RAD was invited to present at the California Political Treasurers Conference on August 8, 2019 in Washington, DC. RAD staff will conduct a Best Practices session followed by a “Meet Your Analyst” session.

Finally, RAD completed PAC and Party Committee audit referrals for the 2017-2018 election cycle during the third quarter and all referrals were sent to the Audit Division on July 14, 2019.

Attachments

Appendix A, FY 2019 Highlights and FY Overview for Office of Compliance Goals
Appendix B, Open Audits Report
Appendix C, Proposed Final Audit Report – Due Date
Appendix D, ADR Civil Penalty Report
Appendix E, AF Performance Goals Report
Appendix F, AF Penalties Assessed and Collected



Status of Compliance

FY 2019
(10/1/2018 – 6/30/2019)

Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19 (6/30/19)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%	94%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	99.0%	99.9%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2019 Performance Goals	Status 6/30/19
RAD staff collaborated with OCIO and the Information Division on the development of Party Committee and Multistate IE reporting examples.	The Party Committee and Multistate IE reporting examples were posted on the website in May and June 2019.
A redacted version of the 2019-2020 RAD Review & Referral Procedures was approved by the Commission.	The redacted version of the 2019-2020 RAD Review & Referral Procedures was posted on the website on July 16, 2019.
RAD staff collaborated with the Information Division on a series of reporting webinars for Trade Association PACs, Party Committees, and Candidate Committees, as well as a FECfile webinar.	The webinars were held in April, May and June 2019.

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 2: Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs

Performance Goals	FY 14	FY 15	FY 16	FY 17	FY 18	FY 19 (6/30/19)
RAD to review 75% of reports within 90 days of receipt	85.4%	79.3%	92.9%	76.6%	92.2%	75%
RAD to send 75% of RFAs within 40 days of report review	84%	92%	92%	88%	88%	85%
(b) (7)(E)	96.8%	93.5%	100%	96.2%	96.9%	86.36%
(b) (7)(E)	93%	43%	56%	25%	45%	100%
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	100%	97%	81.8%	96.67%	100%	96.9%
(b) (7)(E)	95%	100%	100%	100%	99%	85%

Strategic Objective 4: Foster a Culture of High Performance

Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 14	FY 15	FY 16	FY 17	FY 18	FY 19 (6/30/19)
RAD	Documents/ Transactions Coded	N/A	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	9,125/ 30,869,828	4,287/ 17,734,302
	Documents/Pages Processed in Paper Automation System	N/A	N/A	N/A	8,139/ 684,747	8,822/ 902,572	4,079/ 39,235
	Documents/Pages Reviewed	68,282/ 9,211,502	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	71,807/ 29,794,245
	Letters sent	10,220	13,433	13,253	14,796	13,763	9,737
	Telephone calls handled	10,673	11,822	12,362	11,634	13,036	9,684
	Email inquiries handled	N/A	N/A	N/A	N/A	396	477
	Referrals	59	91	43	95	46	34
	AF Cases RTB/FD	70/55	191/159	83/33	163/168	95/23	254/51
Audit	(b) (7)(E)						
ADRO							
OAR	Cases Received	6	35	12	29	8	29
	Cases Closed (FD)	5	32	11	32	10	22



Open Audits
As of 7/31/2019
(Confidential and Sensitive)

			<u>Date of Last Action</u>	<u>Audit Manager</u>	<u>Report Track</u>
Pre-Audit					
2018 MIKE BRAUN FOR INDIANA	C00653147		04/25/2019	Morcomb	B
Total - 1					
Fieldwork					
2018 VAN DREW FOR CONGRESS	C00661868		07/30/2019	Burgess	B
2018 DR. RAUL RUIZ FOR CONGRESS	C00502575		07/30/2019	Smith	B
(b) (3) (A)					
Total - 3					
Draft Final Audit Report Writing					
2016 MISSISSIPPI REPUBLICAN PARTY	C00084368		06/26/2019	Pacious	B
Total - 1					
Draft Final Audit Report Committee Response Period					
2016 TENNESSEE DEMOCRATIC PARTY	C00167346		07/17/2019	Burgess	B
Total - 1					
Audit Division Recommendation Memorandum Writing					
2016 SOUTH DAKOTA DEMOCRATIC PARTY	C00160937		07/19/2019	Favin	B
Total - 1					
Proposed Final Audit Report Writing					
2016 AMBULATORY SURGERY CENTER ASSOCIATION PAC (ASCAPAC)	C00424788		07/25/2019	Pacious	B
Total - 1					
Audits in OGC					
2016 THE 2016 COMMITTEE	C00569905	IAR	06/04/2019	Favin	B
Total - 1					



Open Audits
As of 7/31/2019
(Confidential and Sensitive)

9 Open Audits

Legend

Track A	Audits with <u>no</u> unresolved legal issues
Track B	State/local Party audits with findings PAC audits with unresolved legal issues Authorized audits with unresolved legal issues
Track C	Audits with <u>no</u> findings
IAR	Interim Audit Report
PAR	Preliminary Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report
Text	If text is red, the report has not been sent to OGC for a legal analysis



Open Audits
As of 7/31/2019
(Confidential and Sensitive)

Audit Caseload

Audit Manager	Number of Audits	Percent of Total Audits ¹
Burgess	2	22%
Favin	2	22%
Morcomb	1	11%
Pacious	2	22%
Smith	2	22%
Totals	9	100%

¹ May not total 100% due to rounding

Comments

2016

Ambulatory Surgery Center Assoc. PAC (ASCAPAC)

(b) (5)

Mississippi Republican Party

(b) (5)

South Dakota Democratic Party

(b) (5)

Tennessee Democratic Party

(b) (5)

The 2016 Committee

(b) (5)

2018

Dr. Raul Ruiz for Congress

(b) (5)

Mike Braun for Indiana

(b) (5)

(b) (3) (A)

(b) (5)

Van Drew for Congress

(b) (5)



Proposed Final Audit Report - Due Date

As of 7/31/2019

(Confidential and Sensitive)

	<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2016 AMBULATORY SURGERY CENTER ASSOCIATION PAC (ASCAPAC)	Pacious	PFAR	Report Writing	11/29/2017
2016 SOUTH DAKOTA DEMOCRATIC PARTY	Favin	ADRM	Memorandum Writing	11/29/2017
2016 TENNESSEE DEMOCRATIC PARTY	Burgess	DFAR	Committee Response Period	01/26/2018
2016 THE 2016 COMMITTEE	Favin	IAR	OGC Reviewing	11/29/2017
2016 MISSISSIPPI REPUBLICAN PARTY	Pacious	DFAR	Report Writing	01/26/2018
2018 STEVE CHABOT FOR CONGRESS	Smith		Fieldwork	04/25/2019
2018 DR. RAUL RUIZ FOR CONGRESS	Smith		Fieldwork	04/25/2019
2018 VAN DREW FOR CONGRESS	Burgess		Fieldwork	04/25/2019
2018 MIKE BRAUN FOR INDIANA	Lmorcomb		Pre-Audit	04/25/2019

(b) (7)(E)

9 Open Audits

Legend

IAR	Interim Audit Report
PAR	Preliminary Audit Report
DFAR	Draft Final Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year: 10/01/2017 To: 09/30/2019

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY-2018	511	No. Treasurer ADR 714 Lynn Star Committee	\$250.00	11/04/2017	\$250.00	01/25/2018	\$0.00	None		
	828	National Right To Life Political Action Committee Cookfield, Wayne	\$3,375.00	12/06/2017	\$3,375.00	12/06/2017	\$0.00	Conduct internal education program for employees or staff Develop a FEC Compliance Manual	03/06/2018 03/06/2018	03/06/2018 03/06/2018
	829	Adam Clayton Powell for Congress Wenderson, Mark L.	\$2,550.00	12/06/2017				File amended reports File future reports timely	12/06/2017	
	830	Orenlicher for Congress Gaboratch, David S.	\$2,150.00	12/17/2017	\$2,150.00	12/12/2017	\$0.00	Meet with RAD staff	12/17/2017	01/08/2018
	531	Combs, Bill 21st Century Democrats	\$5,850.00	01/23/2018	\$5,850.00	01/02/2018	\$0.00	Develop a FEC Compliance Manual	03/04/2018	
	832	Democratic Party Of New Mexico Lara, Robert	\$8,600.00	05/12/2018	\$8,600.00	11/14/2017	\$0.00	Attend FEC seminar	12/13/2018	12/01/2017
	833	National Right to Life Victory Fund Cookfield, Wayne	\$6,000.00	12/06/2017	\$6,000.00	12/06/2017	\$0.00	Conduct internal education program for employees or staff Develop a FEC Compliance Manual	03/06/2018 03/06/2018	03/06/2018 03/06/2018

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	835	Planned Parenthood Action Fund Inc. DBA Planned Parenthood Federal PAC Hubbard, Tshombe	\$2,600.00	02/16/2018	\$2,600.00	01/30/2018	\$0.00	Not Applicable		
	836	Lisler, Lisa Arizona Grassroots Action PAC	\$2,250.00	01/06/2018	\$2,250.00	01/24/2018	\$0.00	Develop a FEC Compliance Manual	03/07/2018	03/13/2018
	837	CITIZENS UNITED SUPER PAC LLC Catts, Lauren	\$5,850.00	01/24/2018	\$5,850.00	02/26/2018	\$0.00	Other	02/22/2018	
	838	Manson, Christopher M Sturmair for Senate	\$8,340.00	01/05/2018	\$8,340.00	04/15/2018	\$0.00	Committee will file for termination		
	840	Democratic Party of Arkansas Vandiver, Dawna	\$10,400.00	02/20/2019	\$10,400.00	04/11/2019	\$0.00	Attend FEC seminar File amended reports	02/20/2019 06/20/2018	
	841	Michigan Democratic State Central Committee O'Brien, Sandy	\$6,600.00	03/22/2018	\$6,600.00	04/11/2018	\$0.00	Attend FEC seminar File amended reports	02/20/2019 06/20/2018	
	842	Arizona Republican Party Letteri, Bob	\$23,000.00	06/30/2018	\$23,000.00	06/20/2018	\$0.00	Attend FEC seminar File amended reports	02/20/2019 04/22/2018	04/26/2018
	843	Himpler, Bill American Financial Services Association PAC Himpler, Bill American Financial Services Association PAC	\$11,000.00	03/05/2018	\$11,000.00	01/03/2018	\$0.00	Conduct & certify internal audit/reconciliation	02/01/2019 02/01/2020	

Period	Cases#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	844	Jimmy Gomez for Congress Hodga, Mary	\$2,400.00	03/05/2018	\$2,400.00	02/28/2018	\$0.00	Develop a FEC Compliance Manual	05/01/2018	07/19/2018
	845	Planned Parenthood Advocates of Wisconsin Political Fund James, Wei	\$6,850.00	03/07/2018	\$6,850.00	04/24/2018	\$0.00	Attend FEC seminar	03/07/2019	03/27/2019
	848	Spies, Charles R., Esq. Right to Rise USA	\$2,100.00	04/20/2018	\$2,100.00	04/11/2018	\$0.00	Attend FEC seminar	09/23/2019	
	849	Backer, Dan The Committee to Defend the President	\$3,700.00	04/20/2018	\$3,700.00	04/25/2018	\$0.00	File amended reports	07/20/2018	07/31/2018
	850	The Loosa Group Whitchee, John E	\$3,800.00	05/04/2018	\$3,800.00	04/12/2018	\$0.00	Attend FEC seminar	01/04/2019	02/27/2019
	851	Al Lawson for Congress Sessions, Johnny Frank	\$2,650.00	10/07/2018	\$2,650.00	10/29/2018	\$0.00	Attend FEC seminar	05/07/2019	
	853	Hispanic Victory PAC Decker, Gustavo	\$7,600.00	08/15/2018	\$7,600.00	08/09/2018	\$0.00	None		
	854	Make America Great Again Caldwell, Leslie	\$3,375.00	05/11/2018	\$3,375.00	05/13/2018	\$0.00	File amended reports	05/11/2018	
	855	Utah Republican Party Young, Abram O.	\$7,600.00	05/16/2019				Attend FEC seminar File amended reports	06/16/2019 08/16/2018	
	857	Minnesota Democratic Farmer Labor Party Morales, Tyler	\$2,500.00	06/01/2018	\$2,500.00	09/05/2018	\$0.00	Attend FEC seminar	03/07/2019	
	860	Edward Jones PAC Hill, Jesse	\$4,000.00	08/15/2018	\$4,000.00	08/03/2018	\$0.00	Attend FEC seminar	07/16/2019	04/04/2019

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	853	Americans Deserve Better PAC, Inc. Nusse, Geoffrey J.	\$2,000.00	08/24/2018	\$2,000.00	07/27/2018	\$0.00	Committee will file for termination	09/23/2018	08/09/2018
	854	Nevada Republican Central Committee Benzano, Michael J.	\$6,000.00	09/30/2018	\$5,000.00	09/14/2018	\$0.00	Attend FEC seminar	11/28/2018	09/05/2018
	855	Robinson, Eric Conservatives United	\$2,550.00	08/15/2018	\$2,550.00	07/18/2018	\$0.00	Attend FEC seminar	07/16/2019	
	857	Working for Us Political Action Committee Inc Rosenthal, Steven	\$8,800.00	06/18/2018	\$8,800.00	06/14/2018	\$0.00	Other	06/18/2018	07/31/2018
	858	National Nurses United for Patient Protection R., M, Marsha	\$3,500.00	11/20/2018	\$3,500.00	11/16/2018	\$0.00	Attend FEC seminar	09/20/2019	
	859	MOVEON.ORG Political Action Matzko, Tom	\$1,575.00	09/28/2018	\$1,575.00	09/05/2018	\$0.00	Other	09/28/2018	
	870	Eugene Ludwig	\$3,700.00	08/09/2018	\$3,700.00	07/24/2018	\$0.00	Other		
	876	National Association of Insurance and Financial Advisors Political Action Comm Tassey, Matthew S.	\$3,800.00	10/13/2018	\$3,800.00	09/18/2018	\$0.00	Attend FEC seminar	09/13/2019	10/04/2018
Sub-Total: FY-2018			\$175,415.00		\$165,065.00		\$0.00			
FY-2019	821	Kind For Congress Committee Smith, Brent	\$5,800.00	03/13/2019	\$5,800.00	03/13/2019	\$0.00	Attend FEC seminar	12/11/2020	
	852	American Principles Laur, Eytan	\$5,000.00	12/19/2018	\$5,000.00	11/20/2018	\$0.00	Attend FEC seminar	11/19/2019	
								File amended reports	01/18/2019	01/22/2019

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	553	Wofson, Howard Independence USA PAC	\$4,000.00	03/05/2015	\$4,000.00	02/26/2015	\$0.00	None		
	655	Rights & Democracy Action Stockinger, Pen	\$1,250.00	11/03/2018	\$1,250.00	10/15/2018	\$0.00	Committee will file for termination	12/03/2018	10/12/2018
	871	Equality Pennsylvania Dungee, Joseph	\$5,900.00	10/15/2020				Attend FEC seminar	10/15/2019	
	873	Urban Victory Fund (UVF) Knechen, Onie	\$750.00	11/17/2018	\$750.00	11/01/2018	\$0.00	Attend FEC seminar File amended reports	10/18/2018 11/17/2018	
	874	nam 30ty, Alexander Restore American Freedom and Liberty	\$2,650.00	12/26/2019				Conduct & certify internal audit/reconciliation	11/26/2019	
	877	Arizona Republican Party Lettieri, Bob	\$45,000.00	11/13/2019	\$20,000.00	07/16/2019	\$25,000.00	File amended reports Meet with RAD staff	05/12/2019 05/12/2019	04/30/2019 04/17/2019
	878	Chale, Bradley T Pardon for Seniors	\$30,000.00	03/11/2019	\$30,000.00	03/03/2018	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/23/2019 05/13/2019
	879	Michigan Democratic State Central Committee O'Brien, Sean	\$7,750.00	03/11/2019	\$7,750.00	03/12/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/24/2019 05/14/2019
	880	Massachusetts Democratic State Committee Yorke, Paul G	\$7,050.00	03/11/2019	\$7,050.00	04/01/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/24/2019 05/15/2019

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	881	Democratic Party of South Carolina George, Verna E.	\$9,000.00	08/12/2019	\$9,000.00	06/31/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/26/2019 05/10/2019
	882	Democratic Party of Arkansas Vandiver, Dawne	\$7,900.00	05/13/2019	\$7,900.00	06/06/2019	\$0.00	Attend FEC seminar	05/13/2019	04/22/2019
	886	Kelly for Congress Page, Fred H.	\$1,900.00	04/06/2019	\$1,900.00	03/26/2019	\$0.00	Attend FEC seminar	03/07/2020	
	887	Garcapita, Holly Brian Higgins for Congress	\$3,100.00	04/13/2019	\$3,100.00	03/27/2019	\$0.00	Conduct internal education program for employees or staff	06/13/2019	05/11/2019
	888	Marijuana Policy Project PAC Murphy, Don	\$4,000.00	04/13/2019	\$4,000.00	04/09/2019	\$0.00	Committee will file for termination	05/13/2019	04/30/2019
	891	Schickel Iowa Campaign Committee Hubay, Scott	\$750.00	06/06/2019	\$750.00	05/30/2019	\$0.00	Attend FEC seminar	06/05/2020	05/28/2019
	892	The Congressman Joe Barton Committee Barton, Kristin	\$3,680.00	06/08/2019	\$3,680.00	05/30/2019	\$0.00	Committee will file for termination	07/08/2019	06/10/2019
	893	Nee, Sam C SEAL PAC Supporting Electing American Leaders PAC	\$10,000.00	06/08/2019	\$10,000.00	06/26/2019	\$0.00	Attend FEC seminar	05/09/2020	
	894	American Future Fund	\$15,600.00	07/05/2019	\$15,600.00	06/19/2019	\$0.00	Other	09/03/2019	
	895	Americas PAC Donelson, Tom	\$1,500.00	06/08/2019	\$1,500.00	04/22/2019	\$0.00	Attend FEC seminar	05/08/2020	
	897	Marshall for Senate Gant, Ron	\$7,500.00	08/17/2019	\$7,500.00	07/24/2019	\$0.00	Attend FEC seminar	07/18/2020	

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	896	Mayor for Congress Maryon Brax	\$5,500.00	06/14/2019				Attend FEC seminar Conduct & certify internal audit/reconciliation	07/15/2020	
	901	Puig, Randall Lee Principles First, Inc.	\$4,900.00	08/14/2019				Committee will file for termination	10/13/2019	
Sub-Total : FY-2019			\$190,480.00		\$146,530.00		\$25,000.00			
Grand Total :			\$265,895.00		\$311,595.00		\$25,000.00			



AF Performance Goals

Print Date: July 31, 2019

Selected Parameters:

Office: Both

Start Date: 10/01/2018

End Date: 06/30/2019

*Exception: YES



AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date
Processed					
2018	YE	H_S_P_UNAUTH	N	01/31/2019	04/01/2019
2018	30G	UNAUTH	N	12/06/2018	03/19/2019
2018	30G	AUTH	N	12/06/2018	02/04/2019
2018	M11	P_UNAUTH	N	11/20/2018	02/04/2019
2018	12G	UNAUTH_Q	Y	10/25/2018	03/12/2019
2018	12G	AUTH	Y	10/25/2018	12/10/2018
2018	12G	UNAUTH_M	Y	10/25/2018	12/10/2018
2018	M10	P_UNAUTH	Y	10/20/2018	12/04/2018
2018	Q3	H_S_P_UNAUTH	N	10/15/2018	11/27/2018
2018	Q3	H_S_P_UNAUTH	Y	10/15/2018	11/26/2018
2018	M9	P_UNAUTH	N	09/20/2018	10/29/2018
2018	12P	AUTH	Y	08/30/2018	10/22/2018
2018	12P	AUTH	Y	08/23/2018	10/22/2018
2018	12P	AUTH	Y	08/16/2018	10/15/2018
2018	12P	AUTH	Y	08/02/2018	10/01/2018
2018	YE	H_S_P_UNAUTH	N	01/31/2019	04/09/2019
2019	Q1	H_S_P	N	04/15/2019	06/11/2019
2019	M2	P_UNAUTH	N	02/20/2019	04/15/2019

Total AF Reports Processed

18

Average Processing Days

61.67

(b) (7)(E)

Percentage to Goal

77.78%

Processed - No committees

Year	Type	Description	Election Sensitive	Due Date	Action Date
2018	30GR	AUTH	N	01/07/2019	02/11/2019
2018	30SGR	AUTH	N	12/27/2018	02/11/2019
2018	30GR	AUTH	N	12/20/2018	02/11/2019
2018	M12	P_UNAUTH	N	12/20/2018	02/11/2019
2018	30SG	AUTH	N	12/06/2018	02/04/2019

(b) (7)(E)



AF Performance Goals

(Confidential and Sensitive)

Processed - No committees

					Action Date
2018	12GR	AUTH	Y	11/26/2018	02/04/2019
2018	12SGR	AUTH	Y	11/15/2018	12/17/2018
2018	12GR	AUTH	Y	11/08/2018	12/11/2018
2018	12SG	AUTH	Y	10/25/2018	12/04/2018
2018	M10	P_UNAUTH	N	10/20/2018	11/29/2018
2018	30SG	AUTH	N	09/06/2018	10/22/2018
2018	12P	AUTH	Y	08/31/2018	10/22/2018
2018	12P	AUTH	Y	08/25/2018	10/22/2018
2018	M8	P_UNAUTH	N	08/20/2018	10/15/2018
2018	12PR	AUTH	Y	08/16/2018	10/15/2018
2018	12P	AUTH	Y	08/13/2018	10/09/2018
2018	12P	AUTH	Y	08/09/2018	10/09/2018
2018	12PR	AUTH	Y	08/02/2018	10/01/2018
2019	M5	P_UNAUTH	N	05/20/2019	06/26/2019
2019	12SG	AUTH	Y	05/09/2019	06/26/2019
2019	12SP	AUTH	Y	05/02/2019	06/26/2019
2019	M4	P_UNAUTH	N	04/20/2019	06/17/2019
2019	12SP	AUTH	Y	04/18/2019	06/17/2019
2019	M3	P_UNAUTH	N	03/20/2019	04/22/2019
2019	30GR	AUTH	N	02/07/2019	04/03/2019
2019	12GR	AUTH	Y	12/27/2018	02/25/2019

Total AF Reports Processed-No Committees 26

Average Processing Days 50.88

(b) (7)(E)

Percentage to Goal: 92.31%

(b) (7)(E)



AF Performance Goals

(Confidential and Sensitive)

Total AF Reports	44
Average Processing Days	55.3

(b) (7)(E)

Percentage to Goal	86.36%
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RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters

RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters

processed are those that have a RTB Circ Date or a status of processed-no committees. does NOT include report type 48H
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rpt Date	ROR Circ Date	# Days	Within 60 Days
2018	Q1	3397	C00368415	08/08/2018	10/02/2018	55	Y
2018	Q2	3455	C00381517	11/01/2018	12/21/2018	50	Y
2018	Q2	3460	C00638825	10/25/2018	11/05/2018	12	Y
2018	Q2	3463	C00634873	10/29/2018	11/08/2018	10	Y
2018	Q2	3471	C00637728	10/30/2018	12/19/2018	50	Y
2018	12P	3487	C00660126	11/13/2018	02/05/2019	84	N
2018	M9	3489	C00147231	12/18/2018	02/14/2019	58	Y
2018	Q3	3496	C00679068	02/01/2019	03/27/2019	54	Y
2018	Q3	3501	C00131708	01/28/2019	03/28/2019	60	Y
2018	Q3	3519	C00668137	02/05/2019	03/12/2019	35	Y
2018	Q3	3526	C00641035	01/28/2019	03/22/2019	53	Y
2018	Q3	3528	C00661173	01/28/2019	03/15/2019	46	Y
2018	Q3	3533	C00634873	01/28/2019	03/13/2019	44	Y
2018	Q3	3544	C00614305	01/28/2019	03/13/2019	44	Y
2018	M10	3547	C00147231	01/31/2019	02/14/2019	14	Y
2018	12G	3552	C00147231	01/31/2019	02/14/2019	14	Y
2018	48H	3562	C00647081	01/28/2019	03/27/2019	58	Y
2018	30G	3572	C00666131	03/19/2019	05/16/2019	58	Y
2018	48H	3574	C00653195	04/19/2019	05/14/2019	25	Y
2018	12G	3588	C00450868	03/19/2019	05/18/2019	58	Y
2018	12G	3598	C00272724	01/21/2019	04/17/2019	27	Y
2018	30G	3622	C00492579	05/03/2019	06/05/2019	33	Y
2018	30G	3624	C00668757	04/29/2019	05/23/2019	24	Y
2018	30G	3636	C00650432	05/15/2019	06/21/2019	37	Y



AF Performance Goals

(Confidential and Sensitive)

2018	30G	3644	C00157941	04/30/2019	06/12/2019	43	Y
2018	30G	3645	C00131706	04/30/2019	05/20/2019	20	Y
2018	30G	3655	C00522458	04/30/2019	06/13/2019	44	Y
2018	YE	3664	C00324780	04/15/2019	06/12/2019	58	Y
2018	YE	3665	C00658757	04/29/2019	05/23/2019	24	Y
2018	YE	3667	C00216184	04/29/2019	06/12/2019	44	Y
2018	YE	3677	C00516922	05/06/2019	06/18/2019	43	Y
2018	YE	3707	C00601181	05/06/2019	06/14/2019	30	Y

Total Challenges Processed 32

Average Processing Days 41.19

Total Reports Processed within 60 Days 31

Percentage to Goal 96.88%

QAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2019 OCT 31 PM 12:07

AGENDA DOCUMENT NO. X19-36
AGENDA ITEM
For meeting of 11-19-19

MEMORANDUM

SENSITIVE

October 31, 2019

TO: The Commission

THROUGH: Alec Palmer *AP by [signature]*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista Roche *KR*
Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Dayna C. Brown *DCB*
Acting Assistant Staff Director
Audit Division

Debbie Chacona *DC for DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2019 – 4th Quarter Highlights (7/1/19 – 9/30/19) & FY Statistical Overview

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the 4th quarter FY 2019 (7/1/19 – 9/30/19) and fiscal year statistical overview. The intent of this document is to provide an update of the workload and achieved results of the Office of Compliance on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during an upcoming Executive Session.

The attached **Appendix A** provides the Commission with fourth quarter highlights for each office and also a statistical overview of FY 2019 results and progression towards meeting the goals outlined within the 2018-2022 Strategic Plan adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled 'Proposed Final Audit Report – Due Date' which highlights the report manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2019 statistics for meeting strategic performance goals related to the Administrative Fine Program. **Appendix F** (AF Penalties Assessed and Collected) shows the total amount of penalties assessed and collection rate for FY 2015 – 2019. Please note, additional materials concerning the Audit Division are also available (b) (7)(E)

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the overview.

Alternative Dispute Resolution Office (ADRO)

In the fourth quarter of FY 2019, the ADRO received 22 cases (18 from the RAD and 4 from Audit). During this time period, the ADRO closed a total of 20 cases, 19 with approved negotiated settlements, 2 with approved recommendations to dismiss, and 1 that was returned to OGC. In the fourth quarter of FY 2019, the Commission assessed \$93,175 in civil penalties through approved negotiated settlements, and the office collected \$68,825 in penalties.

(b) (7)(E)

As detailed in the statistics provided above, ADRO's caseload is currently high. The 22 cases received in the fourth quarter represent a 212% increase, when compared with recent years. This upward trend continues as the ADRO received 9 new matters in the month of October. Additionally, 10 of the office's 36 active matters are audit eligible cases, which require significant processing time by ADRO staff. Despite the high caseload, the office remains focused on meeting its performance goals.

Administrative Fine Program (Office of Administrative Review)

During the fourth quarter of FY 2019, the Commission processed 8 Reason to Believe (RTB) findings. OAR received 1 challenge and processed 5 Reviewing Officer Recommendations (ROR). The Commission reviewed final determination recommendations in 56 cases, made a final determination that the respondents in 51 cases violated 52 U.S.C. § 30104(a), and assessed \$143,447 in civil penalties. The Commission also collected \$32,622 in fine payments and prepared 54 cases for public release.

(b) (7)(E)

(b) (7)(E) Additionally, OAR forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

In the fourth quarter, the Reviewing Officer also collaborated with ADRO, OGC, OCFO, and OCIO to design new financial reports for ADRO and OGC civil penalties. The reports meet OCFO and Treasury Report on Receivables requirements and will greatly streamline the monthly financial reporting process. The Reviewing Officer will train ADRO and OGC staff on the new reporting process in the first quarter of FY 2020 and continue to provide assistance as necessary.

Audit Division (Audit)

During the fourth quarter of FY 2019, the Audit Division (Audit) processed the following audit reports:

	Audit Report Stage	Number of Reports
Released to Public	Final Audit Report	4
Sent to the Committee	Interim Audit Report	0
	Draft Final Audit Report	2
Circulated to the Commission	Interim Audit Report	0
	Audit Division Recommendation Memorandum	3
	Proposed Final Audit Report	4
Forwarded to OGC	Interim Audit Report	0
	Draft Final Audit Report	2
	Audit Division Recommendation Memorandum	3
	Total # of Audit Reports	18

(b) (7)(E)

Audit has a total of **18** open audits. Four of these audits are authorized committees and fourteen audits are unauthorized committees.

Two of the open audits are for the 2016 election cycle. One audit is in the Draft Final Audit Report stage and the second has been circulated to the Commission with a recommendation to transfer to the Alternative Dispute Resolution Office for further processing.

The remaining 16 open audits are for the 2018 election cycle. Four audits are for authorized committees, each of which have completed fieldwork and are now preparing for exit conferences. On September 27, 2019, the Commission approved the audit of 12 unauthorized committees for

the 2018 cycle. Audit Notification Letters were sent to each committee on October 2nd and pre-audit work has commenced as auditors have begun reviewing and analyzing preliminary records.

The Audit Division received several inquiries from unauthorized committees regarding the Commission's authorization of the audits on September 27th, after Commissioner-Petersen's September 1st departure and, when requested, Audit provided the committees with a redacted copy of the vote certification. One such committee also submitted a Request for Legal Consideration to the Commission on this issue.

Although the Commission currently lacks the quorum needed to vote on the reports that are prepared in accordance with the various stages of the audit process, the Audit Division remains committed to efficient turnaround times. As such, the division will continue to diligently process each audit up to the point where a Commission vote is required to progress to the next phase.

(b) (7) (E)

With respect to the Presidential Election Campaign Fund (PECF), Audit continued forwarding the monthly PECF reports received from the U.S. Treasury, to the Office of Chief Information Officer (OCIO) for web placement. (b) (5)

(b) (5)

(b) (5)

Audit management worked with OPM and updated the position descriptions for the Supervisory Auditor and Assistant Staff Director of Audit positions. An Audit Manager will be retiring on January 3, 2020 and one Auditor is also seeking retirement. This brings the total number of vacancies in the Audit Division to eleven, including nine Auditors and two Audit Managers. As such, Audit will be requesting to hire two Auditors and one Audit Manager to handle the workload.

Reports Analysis Division (RAD)

During the fourth quarter of FY 2019, RAD continued its collaboration with OCIO on the development of the NextGen filing system. RAD staff conducted extensive user acceptance testing on Form 3X, identifying issues and making suggestions for improvements and enhancements. Development on Forms 3 and 3P is expected to begin next month with the other forms to follow in the Spring of 2020. Also during the fourth quarter, RAD participated in several educational outreach initiatives including reporting and FECfile webinars for PACs and Party committees, as well as the FEC regional conference in Chicago. In addition, RAD staff conducted a Best Practices session followed by a "Meet Your Analyst" session for the California Political Treasurers Conference held in Washington, DC during the fourth quarter.

During the fourth quarter RAD staff reviewed a total of 16,986 documents totaling 5,106,555 pages and 79% of the reports were reviewed within 90 days of receipt, thus exceeding the strategic goal of 75% of reports reviewed within 90 days of receipt. RAD generated and sent 2,825 letters to the filing community and 84% of RFAs were sent within 40 days of the report review date. Also during the fourth quarter, RAD generated 48 referrals (3 OGC, 19 ADRO, 3 Administrative Fines, 1 Debt Settlement, and 22 Audit) and sent 1,107 non-filer notices. Finally, the Reports Processing Branch coded 8,727,526 transactions, 1,227 documents and processed 9,182 pages from 883 documents in the Paper Conversion system.

RAD staff completed interviews and made selections for eight Campaign Finance Analysts (CFA), two GS-12 promotions, and an Assistant Branch Chief detail opportunity on the Authorized Branch. In addition, upon receiving approval to backfill a Coding Clerk position, the position was posted, has closed and we are awaiting next steps. We hope to be fully staffed for what is expected to be a busy election year.

Attachments

Appendix A, FY 2019 Highlights and FY Overview for Office of Compliance Goals

Appendix B, Open Audits Report

Appendix C, Proposed Final Audit Report – Due Date

Appendix D, ADR Civil Penalty Report


Appendix E, AF Performance Goals Report

Appendix F, AF Penalties Assessed and Collected



Status of Compliance

FY 2019
(10/1/2018 – 9/30/2019)



Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19 (9/30/19)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%	94.1%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	99.0%	99.9%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2019 Performance Goals	Status 9/30/19
RAD staff collaborated with OCIO on the development and user acceptance testing of FEC Form 3X for the NextGen Efiling System.	Form 3X is expected to be completed by the end of the year.
RAD staff collaborated with the Information Division on reporting & FECfile webinars for PACs and Party Committees, and the FEC regional conference for all committee types in Chicago.	The webinars were held in July 2019 and the regional conference was held in August 2019.

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 2: Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs

Performance Goals	FY 14	FY 15	FY 16	FY 17	FY 18	FY 19 (9/30/19)
RAD to review 75% of reports within 90 days of receipt	85.4%	79.3%	92.9%	76.6%	92.2%	76%
RAD to send 75% of RFAs within 40 days of report review	84%	92%	92%	88%	88%	85%
(b) (7)(E)	96.8%	93.5%	100%	96.2%	96.9%	88%
(b) (7)(E)	93%	43%	56%	25%	45%	100%
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	100%	97%	81.8%	96.67%	100%	97%
(b) (7)(E)	95%	100%	100%	100%	99%	100%

Strategic Objective 4: Foster a Culture of High Performance

Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 14	FY 15	FY 16	FY 17	FY 18	FY 19 (9/30/19)
RAD	Documents/ Transactions Coded	N/A	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828
	Documents/Pages Processed in Paper Automation/ Conversion System	N/A	N/A	N/A	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417
	Documents/Pages Reviewed	68,282/ 9,211,502	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699
	Letters sent	10,220	13,433	13,253	14,796	13,763	12,562
	Telephone calls handled	10,673	11,822	12,362	11,634	13,036	13,149
	Email inquiries handled	N/A	N/A	N/A	N/A	396	658
	Referrals	59	91	43	95	46	82
	AF Cases RTB/FD	70/55	191/159	83/33	163/168	95/23	262/93
Audit	(b) (7)(E)						
ADRO							
OAR	Cases Received	6	35	12	29	8	37
	Cases Closed (FD)	5	32	11	32	10	36



Open Audits

As of 10/31/2019
(Confidential and Sensitive)

			<u>Date of Last Action</u>	<u>Audit Manager</u>	<u>Report Track</u>
Pre-Audit					
(b) (3) (A)					
2018	DEMOCRACY ENGINE, INC., PAC	C00458514	10/02/2019	Burgess	B
2018	GRASSROOTS VICTORY PAC	C00606380	10/02/2019	Burgess	B
2018	NATIONAL TOOLING & MACHINING ASSOCIATION (NTMA) COMMITTEE FOR A STRONG ECONOMY	C00043091	10/02/2019	Favin	B
2015	CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE	C00167320	10/02/2019	Favin	B
(b) (3) (A)					
2018	REPUBLICAN PARTY OF MINNESOTA - FEDERAL	C00001313	10/02/2019	Morcomb	B
2018	THE UTE PAC	C00828671	10/02/2019	Morcomb	B
(b) (3) (A)					
2015	DEMOCRATIC FOUNDATION OF ORANGE COUNTY	C00176420	10/02/2019	Smith	B
					Total - 12
Fieldwork					
2018	VAN DREW FOR CONGRESS	C00661868	07/30/2019	Burgess	B
2018	DR. RAUL RUIZ FOR CONGRESS	C00502575	07/30/2019	Smith	B
2018	MIKE BRAUN FOR INDIANA	C00653147	07/31/2019	Morcomb	B
2018	STEVE CHABOT FOR CONGRESS	C00301838	07/31/2019	Smith	B
					Total - 4
Draft Final Audit Report Writing					
2016	MISSISSIPPI REPUBLICAN PARTY	C00084388	10/02/2019	Pacous	B
					Total - 1
Audits with the Commission					
2016	THE 2016 COMMITTEE	C00369905	IAR 10/28/2019	Favin	B
					Total - 1



Open Audits

As of 10/31/2019
(Confidential and Sensitive)

18 Open Audits

Legend

Track A	Audits with no unresolved legal issues
Track B	State/Local Party audits with findings PAC audits with unresolved legal issues Authorized audits with unresolved legal issues
Track C	Audits with <u>no</u> findings
IAR	Interim Audit Report
PAR	Preliminary Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report
Text	If text is red, the report has not been sent to OGC for a legal analysis



Open Audits
As of 10/31/2019
(Confidential and Sensitive)

Audit Caseload

Audit Manager	Number of Audits	Percent of Total Audits ¹
Burgess	4	22%
Favin	4	22%
Morecomb	3	17%
Paciorek	3	17%
Smith	4	22%
Totals	18	100%

¹ May not total 100% due to rounding



Open Audits

As of 10/31/2019
(Confidential and Sensitive)

Comments

2016

Mississippi Republican Party
(b) (5)

The 2016 Committee
(b) (5)

2018

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)

Connecticut Democratic State Central Committee
(b) (5)

Democracy Engine PAC
(b) (5)

Democratic Foundation of Orange County
(b) (5)

(b) (3) (A)
(b) (5)

Dr. Raul Ruiz for Congress
(b) (5)

Grassroots Victory PAC
(b) (5)

(b) (3) (A)
(b) (5)

Mike Braun for Indiana
(b) (5)

National Tooling & Machining Association Committee for a Strong Economy
(b) (5)

Republican Party of Minnesota - Federal
(b) (5)

Steve Chabot for Congress
(b) (5)

The UTE PAC
(b) (5)



Open Audits

As of 10/31/2019

(Confidential and Sensitive)

(b) (3) (A)

(b) (5)

Van Drew for Congress

(b) (5)



Proposed Final Audit Report - Due Date

As of 10/31/2019

(Confidential and Sensitive)

	<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2016 THE 2016 COMMITTEE	Favin	IAR	Circulated to Commission	11/29/2017
2016 MISSISSIPPI REPUBLICAN PARTY	Paciou	DFAR	Report Writing	01/26/2018
2018 STEVE CHABOT FOR CONGRESS	Smith		Fieldwork	04/25/2019
2018 DR. RAUL RUIZ FOR CONGRESS	Smith		Fieldwork	04/25/2019
2018 MIKE BRAUN FOR INDIANA	Lmorcomb		Fieldwork	04/25/2019
2018 VAN DREW FOR CONGRESS	Burgess		Fieldwork	04/25/2019
2018 REPUBLICAN PARTY OF MINNESOTA - FEDERAL	Lmorcomb		Pre-Audit	10/02/2019
.....				
(b) (3) (A)				
2018 NATIONAL TOOLING & MACHINING ASSOCIATION (NTMA) COMMITTEE FOR A STRONG ECONOMY	Favin		Pre-Audit	10/02/2019
2018 CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE	Favin		Pre-Audit	10/02/2019
2018 DEMOCRATIC FOUNDATION OF ORANGE COUNTY	Smith		Pre-Audit	10/02/2019
(b) (3) (A)				
2018 DEMOCRACY ENGINE, INC., PAC	Burgess		Pre-Audit	10/02/2019
2018 GRASSROOTS VICTORY PAC	Burgess		Pre-Audit	10/02/2019
(b) (3) (A)				
2018 THE UTE PAC	Lmorcomb		Pre-Audit	10/02/2019
(b) (3) (A)				
.....				

(b) (7)(E)



Proposed Final Audit Report - Due Date

As of 10/31/2019

(Confidential and Sensitive)

18 Open Audits

Legend

IAR	Interim Audit Report
PAR	Preliminary Audit Report
DFAR	Draft Final Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year: 10/01/2017 to 09/30/2019

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY-2018	B11	No. Treasurer ADR 114 Lone Star Committee	\$250.00	11/04/2017	\$250.00	01/23/2018	\$0.00	None		
	828	National Right To Life Political Action Committee Cockfield, Wayne	\$3,375.00	12/06/2017	\$3,375.00	12/08/2017	\$0.00	Conduct internal education program for employees or staff Develop a FEC Compliance Manual	03/06/2018 03/06/2018	03/08/2018 03/09/2018
	826	Aca - Clayton Powell for Congress Wienstein, Mark J.	\$2,550.00	12/06/2017				File amended reports File future reports timely	12/03/2017	
	830	Oreidichter for Congress Gabovitch, David S.	\$2,150.00	12/17/2017	\$2,150.00	12/12/2017	\$0.00	Meet with RAD staff	12/17/2017	01/09/2018
	831	Combs, Bu 21st Century Democrats	\$5,850.00	01/03/2018	\$5,850.00	01/02/2018	\$0.00	Develop a FEC Compliance Manual	03/04/2018	
	832	Democratic Party Of New Mexico Lara, Robert	\$8,600.00	01/12/2018	\$8,600.00	11/14/2017	\$0.00	Attend FEC seminar	12/13/2018	12/01/2017
	833	National Right to Life Victory Fund Cockfield, Wayne	\$5,000.00	12/05/2017	\$5,000.00	12/08/2017	\$0.00	Conduct internal education program for employees or staff Develop a FEC Compliance Manual	03/06/2018 03/06/2018	03/06/2018 03/08/2018

Period	Casaff	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	835	Planned Parenthood Action Fund Inc. DBA Planned Parenthood Federal PAC Hubbard, Tshomba	\$2,600.00	02/16/2018	\$2,600.00	01/30/2018	\$0.00	Not Applicable		
	836	Hicks, Lisa Arizona Grassroots Action PAC	\$2,250.00	01/08/2018	\$2,250.00	01/24/2018	\$0.00	Develop a FEC Compliance Manual	03/07/2018	03/19/2018
	837	CITIZENS UNITED SUPER PAC LLC Gatts, Lauren	\$5,850.00	01/24/2018	\$5,850.00	02/26/2018	\$0.00	Other	02/22/2018	
	838	Marsion, Christopher M Stutzman for Senate	\$9,340.00	04/25/2018	\$9,340.00	04/16/2018	\$0.00	Committee will file for termination		
	840	Democratic Party of Arkansas Vandiver, Dawne	\$10,400.00	02/20/2018	\$10,400.00	04/11/2018	\$0.00	Attend FEC seminar File amended reports	02/20/2018 06/20/2018	
	841	Morgan Democratic State Central Committee O'Brien, Sandy	\$8,600.00	03/22/2018	\$8,600.00	04/11/2018	\$0.00	Attend FEC seminar File amended reports	02/20/2018 09/20/2018	
	842	Arizona Republican Party Lettieri, Bob	\$23,000.00	06/01/2018	\$23,000.00	06/20/2018	\$0.00	Attend FEC seminar File amended reports	02/20/2018 04/22/2018	04/20/2018
	843	Hindle, Bill American Financial Services Association PAC Hempert, Bill American Financial Services Association PAC	\$11,000.00	03/25/2018	\$11,000.00	01/23/2018	\$0.00	Conduct & notify internal and reconciliation	02/20/2018 02/20/2018	

Period	Cas#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	844	Jimmy Gomez for Congress Hodge, Mary	\$2,400.00	03/05/2018	\$2,400.00	03/28/2018	\$0.00	Develop a FEC Compliance Manual	05/01/2018	07/13/2018
	845	Planned Parenthood Advocates of Wisconsin Political Fund Barnes, Mel	\$5,850.00	03/07/2018	\$5,850.00	04/04/2018	\$0.00	Attend FEC seminar	03/07/2018	03/21/2018
	848	Spies, Charles R., Esq. Right to Rise USA	\$2,100.00	04/20/2018	\$2,100.00	04/11/2018	\$0.00	Attend FEC seminar	03/23/2018	
	849	Boover, Dan The Committee to Defend the President	\$3,700.00	04/20/2018	\$3,700.00	04/05/2018	\$0.00	File amended reports	01/20/2018	07/31/2018
	850	The Loose Group Whelchel, John E.	\$3,800.00	05/04/2018	\$3,800.00	04/10/2018	\$0.00	Attend FEC seminar	04/04/2018	02/27/2019
	851	Al Lawson for Congress Sessions, Johnny Frank	\$2,650.00	10/07/2018	\$2,650.00	10/25/2018	\$0.00	Attend FEC seminar	05/07/2018	
	853	Hispanic Victory PAC Decker, Gustavo	\$7,600.00	08/15/2018	\$7,600.00	08/09/2018	\$0.00	None		
	854	Vote America Great Again Gallowell, Leslie	\$3,375.00	05/17/2018	\$3,375.00	05/10/2018	\$0.00	File amended reports	05/11/2018	
	855	Utah Republican Party Young, Abram O.	\$7,800.00	05/16/2018	\$7,800.00	08/02/2018	\$0.00	Attend FEC seminar File amended reports	05/16/2018 08/16/2018	
	857	Minnesota Democratic Farmer Labor Party Morales, Tyler	\$2,500.00	05/01/2018	\$2,500.00	05/05/2018	\$0.00	Attend FEC seminar	05/02/2018	
	860	Edward Jones PAC Hill, Jesse	\$4,000.00	08/15/2018	\$4,000.00	08/03/2018	\$0.00	Attend FEC seminar	07/16/2018	04/04/2019

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	863	Americans Deserve Better PAC Inc. Neale, Geoffrey J.	\$2,000.00	08/24/2018	\$2,000.00	07/27/2018	\$0.00	Committee will file for termination	05/23/2018	08/05/2018
	864	Nevada Republican Central Committee Bertrand, Michael J.	\$5,000.00	09/30/2018	\$5,000.00	09/14/2018	\$0.00	Attend FEC seminar	11/28/2018	09/05/2018
	865	Robinson, Eric Conservatives United	\$2,650.00	08/15/2018	\$2,650.00	07/18/2018	\$0.00	Attend FEC seminar	07/15/2019	
	867	Working for Us Political Action Committee Inc. Rosenthal, Steven	\$6,600.00	02/18/2018	\$6,600.00	08/14/2018	\$0.00	Other	08/18/2018	07/31/2018
	868	National Nurses United for Patient Protection Kuhl, Martha	\$3,500.00	10/20/2018	\$3,500.00	10/24/2018	\$0.00	Attend FEC seminar	09/20/2019	
	869	MOVEON.ORG Political Action Mazzie, Tom	\$1,575.00	09/28/2018	\$1,575.00	09/05/2018	\$0.00	Other	09/28/2018	
	870	Eugene Ludwig	\$3,700.00	08/09/2018	\$3,700.00	07/24/2018	\$0.00	Other		
	876	National Association of Insurance and Financial Advisors Political Action Comm Tassey, Matthew S.	\$3,800.00	10/13/2018	\$3,800.00	09/18/2018	\$0.00	Attend FEC seminar	09/13/2018	10/04/2018
Sub-Total: FY-2018			\$175,415.00		\$172,865.00		\$0.00			
FY-2019	821	Kind for Congress Committee Smith, Brent	\$5,800.00	03/13/2019	\$5,800.00	03/13/2019	\$0.00	Attend FEC seminar	02/11/2020	
	852	American Principles Laor, Eytan	\$5,000.00	12/19/2018	\$5,000.00	11/20/2018	\$0.00	Attend FEC seminar	11/19/2019	
								File amended reports	07/18/2019	01/22/2019

Period	Cas#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	856	Watson, Howard Independence USA PAC	\$4,000.00	03/09/2019	\$4,000.00	02/25/2019	\$0.00	None		
	865	Rights & Democracy Action Stokinger, Pen	\$1,250.00	11/03/2018	\$1,250.00	10/15/2018	\$0.00	Committee will file for termination	12/03/2018	10/12/2018
	871	Equality Pennsylvania Dungee, Joseph	\$6,900.00	10/19/2020				Attend FEC seminar	10/15/2019	
	872	Gilson, Paul McSally for Congress	\$23,400.00	08/04/2019	\$23,400.00	07/04/2019	\$0.00	None		
	873	Urban Victory Fund (U.V.F.) Knechen, Chae	\$750.00	11/17/2018	\$750.00	11/01/2018	\$0.00	Attend FEC seminar File amended reports	10/18/2019 11/17/2019	
	874	Hornaday, Alexander Restora American Freedom and Liberty	\$2,850.00	12/26/2018				Conduct & certify internal audit/reconciliation	11/26/2019	
	877	Arizona Republican Party Leliven, Bob	\$46,000.00	11/13/2019	\$40,000.00	10/15/2019	\$6,000.00	File amended reports Meet with RAO staff	05/12/2019 05/12/2019	04/30/2019 04/17/2019
	878	Crate, Bradley T. Perdue for Senate	\$30,000.00	03/11/2019	\$30,000.00	03/08/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/22/2019 05/13/2019
	879	Morgan Democratic State Central Committee O'Brien, Sandy	\$7,750.00	03/11/2019	\$7,750.00	03/12/2019	\$0.00	Attend FEC seminar File amended reports	06/13/2019 06/13/2019	04/24/2019 05/14/2019
	880	Massachusetts Democratic State Committee	\$7,050.00	03/11/2019	\$7,050.00	04/01/2019	\$0.00	Attend FEC seminar	05/13/2019	04/24/2019

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
		Yodanis, Paul G.						Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/24/2019 05/10/2019
	881	Democratic Party of South Carolina George Voelz E	\$9,000.00	08/12/2019	\$9,000.00	05/31/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/12/2019	04/26/2019 05/10/2019
	882	Democratic Party of Arkansas Vandiver, Dawna	\$7,900.00	05/13/2019	\$7,900.00	02/05/2019	\$0.00	Attend FEC seminar	05/13/2019	04/27/2019
	886	Kelly for Congress Page, Fred H.	\$1,900.00	04/06/2019	\$1,900.00	03/25/2019	\$0.00	Attend FEC seminar	03/07/2019	
	887	Garrabuso, Holly Brian Higgins for Congress	\$3,100.00	04/13/2019	\$3,100.00	03/22/2019	\$0.00	Conduct internal education program for employees or staff	02/13/2019	06/11/2019
	888	Maryland Policy Project PAC Murphy, Don	\$4,300.00	04/11/2019	\$4,300.00	04/09/2019	\$0.00	Committee will file for termination	05/13/2019	04/30/2019
	891	SchottenK Iowa Campaign Committee Hubay, Scott	\$750.00	05/03/2019	\$750.00	05/30/2019	\$0.00	Attend FEC seminar	05/09/2020	06/26/2019
	892	The Congressman Joe Barton Committee Barton, Kristin	\$3,680.00	05/03/2019	\$2,680.00	05/30/2019	\$0.00	Committee will file for termination	07/03/2019	05/10/2019
	893	Neel, Sam C. SEAL PAC Supporting Electing American Leaders PAC	\$10,300.00	06/03/2019	\$10,000.00	06/25/2019	\$0.00	Attend FEC seminar	06/03/2020	
	894	American Future Fund	\$15,500.00	07/05/2019	\$15,500.00	06/19/2019	\$0.00	Other	05/03/2019	03/29/2019
	896	Americas PAC Donelson, Tom	\$1,500.00	06/08/2019	\$1,500.00	04/23/2019	\$0.00	Attend FEC seminar	06/09/2020	

Period	Cash#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	897	Marsha for Senate Gant, Ron	\$7,500.00	06/17/2019	\$7,500.00	07/24/2019	\$0.00	Attend FEC seminar	07/18/2020	11/27/2019
	898	Maryott for Congress Maryott, Brian	\$5,500.00	08/14/2019	\$5,500.00	08/22/2019	\$0.00	Attend FEC seminar Conduct & certify internal audit/reconciliation	07/15/2020	
	901	Purkin, Ronald Lee Principles First, Inc.	\$4,900.00	05/14/2019	\$4,900.00	08/26/2019	\$0.00	Committee will file for termination	10/13/2019	
	904	Legislative Majority PAC Collinson, Eleanor	\$9,500.00	08/30/2019				Attend FEC seminar Conduct & certify internal audit/reconciliation	08/20/2020 08/20/2020 08/20/2021	
	905	Pullins, Scott Oric Majority Trust	\$1,750.00	02/19/2020	\$900.00	10/11/2019	\$1,150.00	Attend FEC seminar	08/19/2020	
	906	Americans for the Cure of Breast Cancer Piano, Robert	\$9,000.00	09/26/2019	\$9,000.00	10/29/2019	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	08/26/2020 10/26/2019	10/26/2019
	937	Tennessee Democratic Party Wohlman, Gordon	\$2,100.00	05/20/2019				Attend FEC seminar File amended reports	06/20/2020 06/20/2019	
	908	Tony Cardenas for Congress May, Jennifer	\$5,575.00	05/26/2019	\$5,575.00	09/27/2019	\$0.00	Conduct internal education program for employees or staff	11/16/2019	
	909	Van Justice Palenya, Deepak	\$2,450.00	05/15/2019	\$2,450.00	05/17/2019	\$0.00	Develop a FEC Compliance Manual		

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	910	National Rifle Association (NRA) Institute for Legislative Action Owens, Robert G.	\$4,500.00	09/28/2019	\$4,500.00	09/10/2019	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	08/29/2020 11/27/2019	
	913	Massachusetts Democratic Party Brown, Ryan	\$9,000.00	09/30/2019	\$9,000.00	10/30/2019	\$0.00	Attend FEC seminar	02/31/2020	
	915	Massachusetts Democratic State Committee Yorkis, Paul G.	\$8,000.00	09/30/2019	\$8,000.00	10/22/2019	\$0.00	Develop a FEC Compliance Manual	10/29/2019	
Sub-Total: FY-2019			\$265,755.00		\$239,455.00		\$26,300.00			
Grand Total:			\$441,170.00		\$412,320.00		\$28,850.00			



AF Performance Goals

Print Date: October 31, 2019

Selected Parameters:

Office: Both

Start Date: 10/01/2018

End Date: 09/30/2019

*Exception: YES



AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)_____
Processed						
2018	YE	H_S_P_UNAUTH	N	01/31/2019	04/09/2019	
2018	YE	H_S_P_UNAUTH	N	01/31/2019	04/01/2019	
2018	30G	UNAUTH	N	12/06/2018	03/19/2019	
2018	30G	AUTH	N	12/06/2018	02/04/2019	
2018	M11	P_UNAUTH	N	11/20/2018	02/04/2019	
2018	12G	UNAUTH_Q	Y	10/25/2018	03/12/2019	
2018	12G	AUTH	Y	10/25/2018	12/10/2018	
2018	12G	UNAUTH_M	Y	10/25/2018	12/10/2018	
2018	M10	P_UNAUTH	Y	10/20/2018	12/04/2018	
2018	Q3	H_S_P_UNAUTH	N	10/15/2018	11/27/2018	
2018	Q3	H_S_P_UNAUTH	Y	10/15/2018	11/26/2018	
2018	M9	P_UNAUTH	N	09/20/2018	10/29/2018	
2018	12P	AUTH	Y	08/30/2018	10/22/2018	
2018	12P	AUTH	Y	08/23/2018	10/22/2018	
2018	12P	AUTH	Y	08/16/2018	10/15/2018	
2018	12P	AUTH	Y	08/02/2018	10/01/2018	
2019	MY	UNAUTH	N	07/31/2019	09/24/2019	
2019	Q2	H_S_P	N	07/15/2019	08/28/2019	
2019	Q1	H_S_P	N	04/15/2019	06/11/2019	
2019	M2	P_UNAUTH	N	02/20/2019	04/15/2019	

Total AF Reports Processed

20

Average Processing Days

50.45

(b) (7)(E)

Percentage to Goal

60.00%

Processed - No committees

2018	30GR	AUTH	N	01/07/2019	02/11/2019	(b) (7)(E)
2018	30SGR	AUTH	N	12/27/2018	02/11/2019	
2018	30GR	AUTH	N	12/20/2018	02/11/2019	

AF Performance Goals

Print Date 10/31/2019

Appendix F

Page 2 of 5



AF Performance Goals

(Confidential and Sensitive)

Processed - No committees

Year	Committee	Auth	Y/N	Action Date	Completion Date
2018	M12	P_UNAUTH	N	12/20/2018	02/11/2019
2018	30SG	AUTH	N	12/06/2018	02/04/2019
2018	12GR	AUTH	Y	11/26/2018	02/04/2019
2018	12SGR	AUTH	Y	11/15/2018	12/17/2018
2018	12GR	AUTH	Y	11/08/2018	12/11/2018
2018	12SG	AUTH	Y	10/25/2018	12/04/2018
2018	M10	P_UNAUTH	N	10/20/2018	11/29/2018
2018	30SG	AUTH	N	09/05/2018	10/22/2018
2018	12P	AUTH	Y	08/31/2018	10/22/2018
2018	12P	AUTH	Y	08/25/2018	10/22/2018
2018	M8	P_UNAUTH	N	08/20/2018	10/15/2018
2018	12PR	AUTH	Y	08/16/2018	10/15/2018
2018	12P	AUTH	Y	08/13/2018	10/09/2018
2018	12P	AUTH	Y	08/09/2018	10/09/2018
2018	12PR	AUTH	Y	08/02/2018	10/01/2018
2019	M7	P_UNAUTH	N	07/20/2019	09/12/2019
2019	12SPR	AUTH	Y	06/27/2019	08/22/2019
2019	30SG	AUTH	N	06/20/2019	08/19/2019
2019	M6	P_UNAUTH	N	06/20/2019	08/13/2019
2019	M5	P_UNAUTH	N	05/20/2019	06/26/2019
2019	12SG	AUTH	Y	05/09/2019	06/26/2019
2019	12SP	AUTH	Y	05/02/2019	05/26/2019
2019	M4	P_UNAUTH	N	04/20/2019	06/17/2019
2019	12SP	AUTH	Y	04/18/2019	06/17/2019
2019	M3	P_UNAUTH	N	03/20/2019	04/22/2019
2019	30GR	AUTH	N	02/07/2019	04/08/2019
2019	12GR	AUTH	Y	12/27/2018	02/25/2019

(b) (7)(E)

Total AF Reports Processed-No Committees	30
Average Processing Days	51.57
Percentage to Goal	93.33%



AF Performance Goals

(Confidential and Sensitive)

Total AF Reports 50

Average Processing Days 55.12

(b) (7)(E)

Percentage to Goal 88.00%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters

RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters
processed are those that have a RTB Circ Date or a status of processed-no committees. does NOT include report type 48H
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2018	Q1	3397	C00368415	08/08/2018	10/02/2018	55	Y
2018	Q2	3455	C00361517	11/01/2018	12/21/2018	50	Y
2018	Q2	3460	C00638825	10/25/2018	11/06/2018	12	Y
2018	Q2	3463	C00634873	10/29/2018	11/08/2018	10	Y
2018	Q2	3471	C00637728	10/30/2018	12/19/2018	50	Y
2018	12P	3487	C00660126	11/13/2018	02/05/2019	84	N
2018	M9	3489	C00147231	12/18/2018	02/14/2019	58	Y
2018	Q3	3496	C00679068	02/01/2019	03/27/2019	54	Y
2018	Q3	3501	C00131706	01/28/2019	03/29/2019	60	Y
2018	Q3	3519	C00668137	02/05/2019	03/12/2019	35	Y
2018	Q3	3526	C00641035	01/28/2019	03/22/2019	53	Y
2018	Q3	3528	C00681173	01/28/2019	03/15/2019	46	Y
2018	Q3	3533	C00634873	01/28/2019	03/13/2019	44	Y
2018	Q3	3544	C00614305	01/28/2019	03/13/2019	44	Y
2018	M10	3547	C00147231	01/31/2019	02/14/2019	14	Y
2018	12G	3552	C00147231	01/31/2019	02/14/2019	14	Y
2018	48H	3582	C00647081	01/28/2019	03/27/2019	58	Y
2018	30G	3572	C00666131	03/19/2019	05/16/2019	56	Y
2018	48H	3574	C00653196	04/19/2019	05/14/2019	25	Y
2018	12G	3588	C00450866	03/19/2019	05/16/2019	58	Y
2018	*2G	3598	C00272724	03/21/2019	04/17/2019	27	Y
2018	48H	3618	C00431353	05/15/2019	07/10/2019	56	Y
2018	48H	3619	C00671859	06/20/2019	08/16/2019	57	Y
2018	30G	3622	C00492579	05/03/2019	06/05/2019	33	Y



AF Performance Goals

(Confidential and Sensitive)

2018	30G	3624	C00658757	04/29/2019	05/23/2019	24	Y
2018	30G	3636	C00650432	05/15/2019	06/21/2019	37	Y
2018	30G	3644	C00157541	04/30/2019	06/12/2019	43	Y
2018	30G	3645	C00131706	04/30/2019	05/20/2019	20	Y
2018	30G	3655	C00522458	04/30/2019	06/13/2019	44	Y
2018	YE	3664	C00324780	04/15/2019	06/12/2019	58	Y
2018	YE	3665	C00658757	04/29/2019	05/23/2019	24	Y
2018	YE	3667	C00216184	04/29/2019	06/12/2019	44	Y
2018	YE	3677	C00516922	05/06/2019	06/18/2019	43	Y
2018	YE	3687	C00670992	05/15/2019	07/10/2019	56	Y
2018	YE	3690	C00656744	05/15/2019	07/02/2019	48	Y
2018	YE	3707	C00661181	05/08/2019	06/14/2019	39	Y
2018	YF	3718	C00433672	05/06/2019	07/03/2019	58	Y

Total Challenges Processed 37

Average Processing Days 43.05

Total Reports Processed within 60 Days 36

Percentage to Goal 97.30%

QAR returns A² where the ROR Circ Date falls within the Start Date and End Date parameters

Administrative Fine Program Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19 10/30/19
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$131,164	\$343,987

(b) (7)(E)

SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AGENDA DOCUMENT NO. X20-02
AGENDA ITEM
For meeting of February 11, 2020

January 30, 2020

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista J. Roche *KJR*
Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Dayna C. Brown *DCB*
Acting Assistant Staff Director
Audit Division

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2020 – 1st Quarter Highlights (10/1/19 – 12/31/19)

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the 1st quarter FY 2020 (10/1/19 – 12/31/19). The intent of this document is to provide an update of the workload and achieved results of the Office of Compliance on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during an upcoming Executive Session.

The attached **Appendix A** provides the Commission with first quarter highlights for each office and also a statistical overview of FY 2020 results and progression towards meeting the goals outlined within the 2018-2022 Strategic Plan adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled 'Proposed Final Audit Report – Due Date' which highlights the report manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2019 statistics for meeting strategic performance goals related to the Administrative Fine Program. **Appendix F** (AF Penalties Assessed and Collected) shows the total amount of penalties assessed and collection rate for FY 2015 – 2020.

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the overview.

Alternative Dispute Resolution Office (ADRO)

In the first quarter of FY 2020, the ADRO received 14 cases. Of these, the Reports Analysis Division (RAD) referred 9 matters and the Office of General Counsel (OGC) transferred 5 matters. During this time period, the ADRO did not close any matters due to the loss of quorum. The Commission collected \$49,400 in civil penalties.

During the fourth quarter, the ADRO circulated 100% of memoranda for a final vote within 140 days, with an average internal processing time of 113 days. There are currently **21** matters pending with the Commission for a vote.

In the first quarter of FY 2020, the ADRO focused on handling a high volume of cases (**44** active matters), including 10 audit eligible matters in which Committees will receive tailored training. In addition, ADRO staff proposed enhancements to its case management software, Law Manager. During the second quarter of FY 2020, the ADRO will work with OCIO to implement these proposals in order to increase office efficiency.

Administrative Fine Program (Office of Administrative Review)

During the first quarter of FY 2020, RAD processed 4 Reason to Believe (RTB) and 8 Final Determination recommendation memoranda, which are awaiting Commission vote. OAR received 1 challenge and processed 2 Reviewing Officer Recommendations (ROR). OAR also processed 3 final determination recommendation memoranda, which are awaiting Commission vote. The Commission collected \$5,339 in fine payments.

(b) (7)(E)

(b) (7)(E) Additionally, OAR forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

In the first quarter, the Reviewing Officer led the implementation of new financial reports for ADRO and OGC civil penalties. The reports meet OCFD and Treasury Report on Receivables requirements and greatly streamline the monthly financial reporting process. The Reviewing Officer continues to work with ADRO and OGC staff to finalize new procedures and on the new reporting process in the first quarter of FY 2020 and continue to provide assistance as necessary. The Reviewing Officer also began to collaborate with OGC on the redesign of the Administrative Fine Calculator for the new website.

Audit Division (Audit)

During the first quarter of FY 2020, the Audit Division (Audit) processed the following audit reports.

	Audit Report Stage	Number of Reports
Released to Public	Final Audit Report	0
Sent to the Committee	Interim Audit Report	0
	Draft Final Audit Report	1
Circulated to the Commission	Interim Audit Report	1
	Audit Division Recommendation Memorandum	0
	Proposed Final Audit Report	0
Forwarded to OGC	Interim Audit Report	0
	Draft Final Audit Report	1
	Audit Division Recommendation Memorandum	0
	Total # of Audit Reports	3

Audit has a total of 18 open audits. Four of these audits are authorized committees and fourteen audits are unauthorized committees.

Two of the open audits are for the 2016 election cycle. One audit is in the Audit Division Recommendation Memorandum stage and the second has been circulated to the Commission with a recommendation to transfer the matter Alternative Dispute Resolution Office for further processing.

Four of the open audits are for 2018 authorized committees, two of which are Congressional audits for which fieldwork has concluded and the Interim Audit Reports are being prepared. The third Congressional audit is currently on hold given that Audit has not received the records necessary to commence the audit. (b) (5), (b) (7)(A)

(b) (5), (b) (7)(A)

(b) (5), (b) (7)(A)

In the fourth of the authorized audits, the exit conference for the Senate committee audit will take place in February.

The remaining 12 open audits are for 2018 unauthorized committees. Pre-audit work is underway for each audit, with entrance conferences scheduled to begin in February and fieldwork in March.

(b) (7)(E)

With respect to the Presidential Election Campaign Fund (PECF), the Commission approved the PECF budget estimates for the fiscal years 2020 – 2030 to the U.S. Treasury. The Commission agreed that under Directive 10, Section 1., the PECF estimate is “budget-related” and its provision is not a duty of the Commission under Title 26. As such, Audit provided the budget estimates to Treasury on January 8, 2020. Audit has received no inquiries or eligibility submissions for presidential matching funds during the 1st quarter.

Audit management coordinated with OPM to finalize the updated position descriptions for the Supervisory Auditor and Assistant Staff Director of Audit positions. The Audit management team reviewed the 2019 Federal Employee Viewpoint Survey results for the Audit Division to

Identify key areas of opportunity for improvement and are developing tangible, practical action items to better the division.

With regard to training, Audit held two division-wide trainings this quarter on Payroll and Levin Funds. Additionally, Audit Managers attended OPM training on Poor Performance versus Poor Conduct.

The Audit Division currently has nine Auditor vacancies and two Audit Manager vacancies. In November the Commission approved the hiring of two Auditors and one Audit Manager. The vacancy announcement for both positions have closed and Audit is awaiting the receipt of applications from HR Solutions to begin the review and interview process. Additionally, one Auditor was recently selected to fill an Auditor vacancy within the agency, resulting in the loss of an additional Auditor, effective February 14th. As such, on January 23rd Audit requested permission to backfill this position.

Reports Analysis Division (RAD)

During the first quarter of FY 2020, RAD continued to play a critical role in the development of the NextGen filing system by conducting extensive user acceptance testing on Form 3X, and identifying issues and making suggestions for improvements and enhancements. Development of Forms 3 and 3P is expected to begin next month with the other forms to follow in the Spring of 2020. Also during the first quarter, RAD collaborated with the Information Division on Party committee reporting examples and on the review of FEA timeframes for posting on the website. In addition, RAD worked with OGC and OCIO on the development and deployment of a web page for closed Administrative Termination and Debt Settlement Plan cases.

During the first quarter RAD staff reviewed a total of 16,040 documents totaling 11,325,441 pages and 88% of the reports were reviewed within 90 days of receipt, thus exceeding the strategic goal of 75% of reports reviewed within 90 days of receipt. RAD generated and sent 1,704 letters to the filing community and 86% of RFAs were sent within 40 days of the report review date. Also during the first quarter, RAD generated 9 referrals to ADR and sent 371 non-filer notices. Finally, the Reports Processing Branch coded 6,067,333 transactions, 787 documents and processed 4,955 pages from 472 documents in the Paper Conversion system.

RAD recently welcomed seven (7) Campaign Finance Analysts (CFA) and a Coding Clerk to the RAD team. We are in the process of filling an additional CFA position internally and due to recent resignations, we received approval to fill two (2) additional CFA positions and have begun the backfill process. In addition, RAD continued its focus on professional development by providing 12 Senior CFA's the opportunity to participate in a 360 Leadership Assessment and by offering a Meyers Briggs training session to all RAD staff.

Attachments

Appendix A, FY 2019 Highlights and FY Overview for Office of Compliance Goals

Appendix B, Open Audits Report

Appendix C, Proposed Final Audit Report – Due Date


Appendix D, ADR Civil Penalty Report

Appendix E, AF Performance Goals Report
Appendix F, AF Penalties Assessed and Collected



Status of Compliance

FY 2020
(10/1/2019 - 12/31/2019)



Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20 12/31/19
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%	94.1%	99.1%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	99.0%	99.9%	99.7%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%	100%

Matters Awaiting a Commission Vote as of 1/30/20

Audit	Admin Fine Program/OAR	ADRO	Total
1	20/3	21	45

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2019 Performance Goals	Status 12/31/19
RAD staff collaborated with OCIO on the development and user acceptance testing of FEC Form 3X for the NextGen Efiling System.	Form 3X is expected to be completed in the second quarter of FY2020, with the other forms to follow.
RAD staff collaborated with the Information Division on reporting & FECfile webinars for Candidate Committees, PACs and Party Committees, and on the FEC regional conference for all committee types in San Diego.	The webinars were held in October, November and December 2019, and the regional conference was held in October 2019.
RAD staff collaborated with the Information Division on Party Committee reporting examples for the website and with OGC on the development of a web page for closed Administrative Termination and Debt Settlement Plans.	The reporting examples were posted in December 2019 and the new web page went live in October 2019.

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 2: Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20
RAD to review 75% of reports within 90 days of receipt	79.3%	92.9%	76.6%	92.2%	76%	88%
RAD to send 75% of RFIs within 40 days of report review	92%	92%	88%	88%	85%	86%
(b) (7)(E)	93.5%	100%	96.2%	96.9%	88%	100%
	43%	56%	25%	45%	100%	N/A ¹
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	97%	81.8%	96.67%	100%	97%	100%
(b) (7)(E)	100%	100%	100%	99%	100%	100%

1 - No PFARs were circulated this quarter

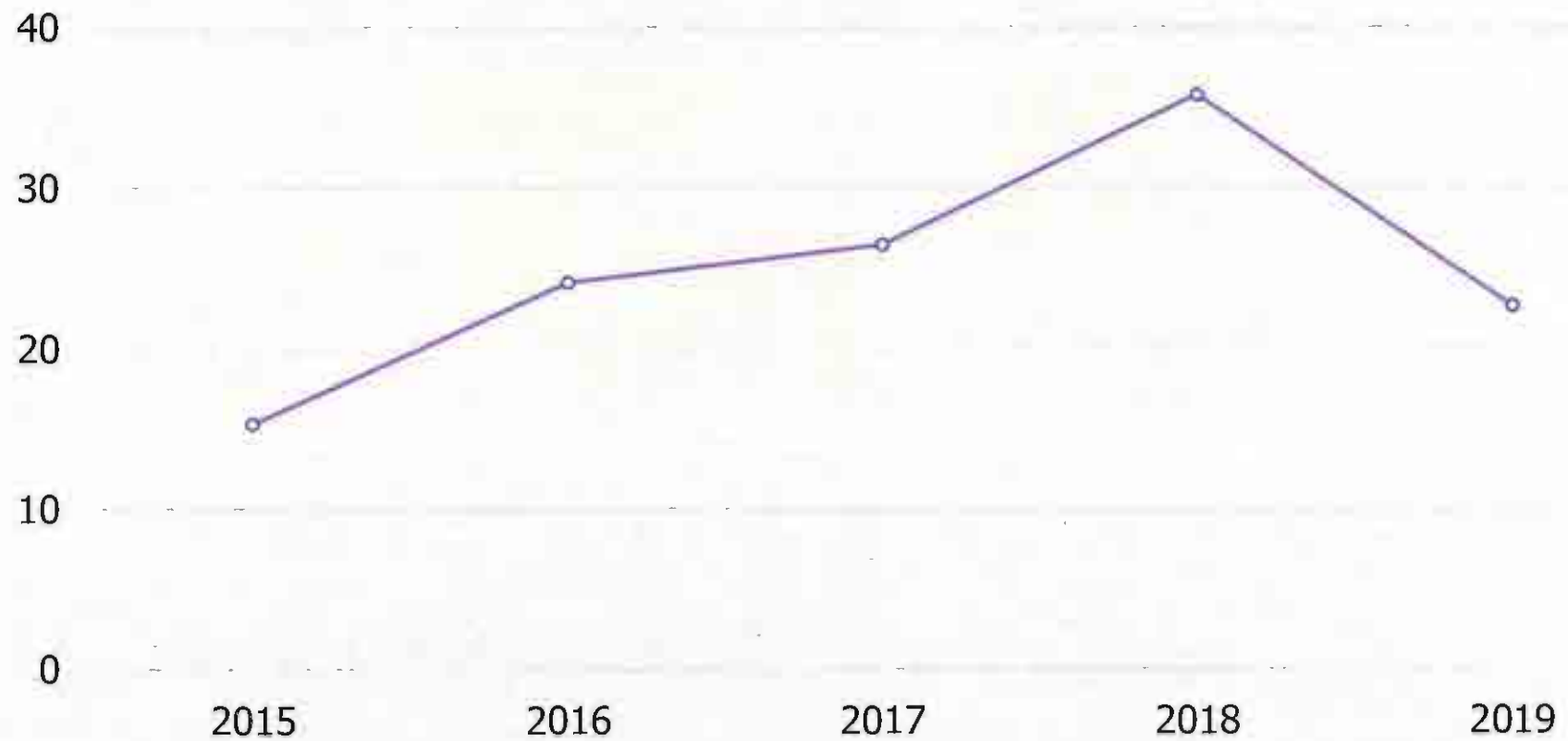
Strategic Objective 4: Foster a Culture of High Performance

Performance Goal 1: Foster a workplace that delivers results

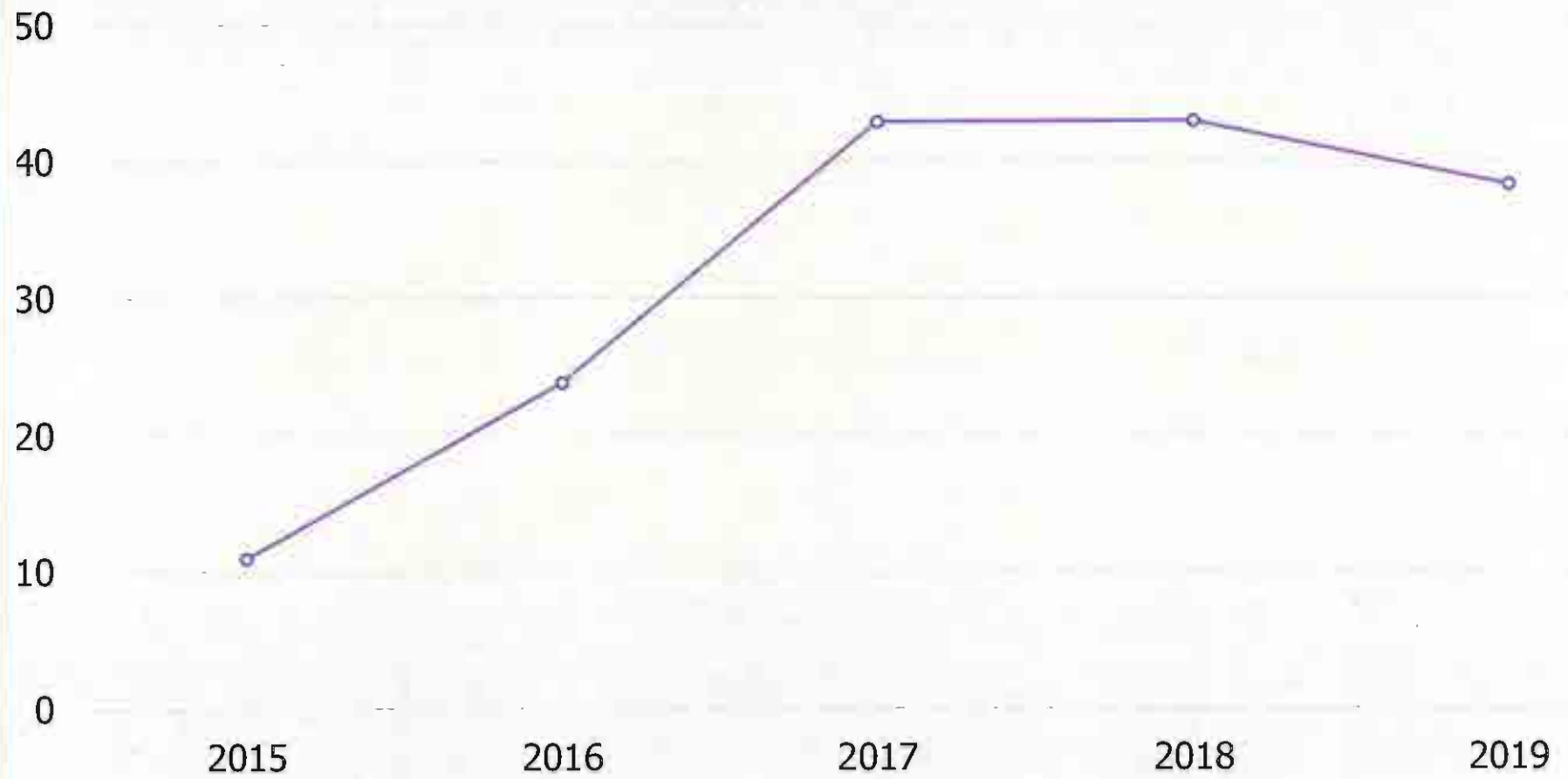
Office	Deliverable	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20 (12/31/19)
RAD	Documents/ Transactions Coded	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828	787/ 6,067,333
	Documents/Pages Processed in Paper Automation/ Conversion System	N/A	N/A	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417	472/ 4,955
	Documents/Pages Reviewed	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699	16,040/ 11,325,441
	Letters sent	13,433	13,253	14,796	13,763	12,562	2,075
	Telephone calls handled	11,822	12,362	11,634	13,036	13,149	2,411
	Email inquiries handled	N/A	N/A	N/A	396	658	168
	Referrals	91	43	95	46	82	9
	AF Cases RTB/FD	191/159	83/33	163/168	95/23	262/93	0/0
Audit	(b) (7)(E)						
ADRO							
OAR	Cases Received	35	12	29	8	37	1
	Cases Closed (FD)	32	11	32	10	36	0

Appendix A

RAD - Total Transactions Processed
(millions)



RAD - Total Pages Reviewed
(millions)





Open Audits

As of 1/30/2020
(Confidential and Sensitive)

			<u>Date of Last Action</u>	<u>Audit Manager</u>	<u>Report Track</u>
Pre-Audit					
(b) (3) (A)					
2018	DEMOCRACY ENGINE, INC., PAC	C00468314	10/02/2019	Burgess	B
2018	GRASSROOTS VICTORY PAC	C00608380	10/02/2019	Burgess	B
2018	NATIONAL TOOLING & MACHINING ASSOCIATION (NTMA) COMMITTEE FOR A STRONG ECONOMY	C00043091	10/02/2019	Lee	B
2018	REPUBLICAN PARTY OF MINNESOTA - FEDERAL	C00001313	10/02/2019	Moncomb	B
2018	THE UTE PAC	C00626671	10/02/2019	Moncomb	B
2018	CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE	C00167320	10/02/2019	Pacios	B
(b) (3) (A)					
2018	DEMOCRATIC REGISTRATION OF ORANGE COUNTY	C00176420	10/02/2019	Smith	B
(b) (3) (A)					
Total - 12					
Fieldwork					
2018	MIKE BRAUN FOR INDIANA	C00553147	07/31/2019	Moncomb	B
2018	STEVE CHABOT FOR CONGRESS	C00301838	07/31/2019	Smith	B
Total - 2					
Interim/Preliminary Report Writing					
2018	VAN DREW FOR CONGRESS	C00661868	12/19/2019	Burgess	B
2018	DR. RAUL RUIZ FOR CONGRESS	C00502575	12/19/2019	Smith	B
Total - 2					
Audit Division Recommendation Memorandum Writing					
2016	MISSISSIPPI REPUBLICAN PARTY	C00084368	01/17/2020	Pacios	B
Total - 1					
Audits with the Commission					
2016	THE 2016 COMMITTEE	C00569905	IAR 10/28/2019	Favin	B
Total - 1					



Open Audits

As of 1/30/2020
(Confidential and Sensitive)

18 Open Audits

Legend

Track A	Audits with no unresolved legal issues
Track B	State/Local Party audits with findings FAC audits with unresolved legal issues Authorized audits with unresolved legal issues
Track C	Audits with <u>no</u> findings
IAR	Interim Audit Report
PAR	Preliminary Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report
Text	If text is red, the report has not been sent to OGC for a legal analysis



Open Audits

As of 1/30/2020
(Confidential and Sensitive)

Audit Caseload

<u>Audit Manager</u>	<u>Number of Audits</u>	<u>Percent of Total Audits ¹</u>
Burgess	4	22%
Favin	1	6%
Lee	1	6%
Morcomb	3	17%
Pacius	4	22%
Smith	5	28%
Totals	18	100%

¹ May not total 100% due to rounding



Open Audits

As of 1/30/2020
(Confidential and Sensitive)

Comments

2016

Mississippi Republican Party

(b) (5)

The 2016 Committee

(b) (5)

2018

(b) (3) (A)

(b) (5)

(b) (3) (A)

(b) (5)

Connecticut Democratic State Central Committee

(b) (5)

Democracy Engine PAC

(b) (5)

Democratic Foundation of Orange County

(b) (5)

(b) (3) (A)

(b) (5)

Dr. Raul Rulz for Congress

(b) (5)

Grassroots Victory PAC

(b) (5)

(b) (3) (A)

(b) (5)

Mike Braun for Indiana

(b) (5)

National Tooling & Machining Association Committee for a Strong Economy

(b) (5)

Republican Party of Minnesota - Federal

(b) (5)

Steve Chabot for Congress

(b) (5)

The UTE PAC

(b) (5)



Open Audits

As of 1/30/2020
(Confidential and Sensitive)

(b) (3) (A)

(b) (5)

Van Drew for Congress

(b) (5)



Proposed Final Audit Report - Due Date

As of 1/30/2020

(Confidential and Sensitive)

	<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2016 THL 2016 COMMITTEE	Favin	IAR	Circulated to Commission	11/29/2017
2016 MISSISSIPPI REPUBLICAN PARTY	Paciou	ADRM	Memorandum Writing	01/25/2018
2018 DR. RAUL RUIZ FOR CONGRESS	Smith	IAR	Report Writing	04/25/2019
2018 VAN DREW FOR CONGRESS	Burgess	IAR	Report Writing	04/25/2019
2018 STEVE CHABOT FOR CONGRESS	Smith		Fieldwork	04/25/2019
2018 MIKE BRAUN FOR INDIANA	Lmorcomb		Fieldwork	04/25/2019
2018 REPUBLICAN PARTY OF MINNESOTA - FEDERAL	Lmorcomb		Pre-Audit	10/02/2019
(b) (5)				
2018 NATIONAL TOOLING & MACHINING ASSOCIATION (NTMA) COMMITTEE FOR A STRONG ECONOMY	Lee		Pre-Audit	10/02/2019
2018 CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE	Paciou		Pre-Audit	10/02/2019
2018 DEMOCRATIC FOUNDATION OF ORANGE COUNTY	Smith		Pre-Audit	10/02/2019
(b) (5)				
2018 DEMOCRACY ENGINE, INC., PAC	Burgess		Pre-Audit	10/02/2019
2018 GRASSROOTS VICTORY PAC	Burgess		Pre-Audit	10/02/2019
(b) (5)				
2018 THE UTE PAC	Lmorcomb		Pre-Audit	10/02/2019
(b) (5)				

(b) (7)(E)



Proposed Final Audit Report - Due Date

As of 1/30/2020

(Confidential and Sensitive)

18 Open Audits

Legend

IAR	Interim Audit Report
PAR	Preliminary Audit Report
DFAR	Draft Final Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year: 10/01/2018 To: 09/30/2020

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY - 2019	821	Kind For Congress Committee Smith, Brett	\$5,800.00	03/12/2019	\$5,800.00	03/13/2019	\$0.00	Attend FEC seminar	02/11/2020	
	852	American Principles Leor, Eytan	\$5,000.00	12/19/2018	\$5,000.00	11/20/2018	\$0.00	Attend FEC seminar File amended reports	11/19/2018 01/18/2019	01/22/2019
	858	Watson Howard Independence USA PAC	\$4,000.00	03/28/2019	\$4,000.00	03/26/2019	\$0.00	None		
	865	Rights & Democracy Action Stodinger, Peri	\$1,250.00	11/03/2018	\$1,250.00	10/15/2018	\$0.00	Committee will file for termination	12/03/2018	10/12/2018
	871	Equally Pennsylvania Zungee, Joseph	\$5,900.00	12/15/2020				Attend FEC seminar	10/16/2019	
	872	Kigora, Paul McSally for Congress	\$23,400.00	08/01/2019	\$23,400.00	07/31/2019	\$0.00	None		
	873	Urban Victory Fund (UVP) Kritchen, Cole	\$750.00	11/14/2018	\$750.00	11/01/2018	\$0.00	Attend FEC seminar File amended reports	10/19/2018 11/17/2018	
	874	Stornaday, Alexander Restore American Freedom and Liberty	\$2,650.00	12/26/2018				Conduct & certify internal audit/reconciliation	11/26/2019	

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	871	Arizona Republican Party Hutter, Bob	\$45,000.00	11/13/2019	\$45,000.00	01/08/2020	\$0.00	File amended reports Meet with RAD staff	05/13/2019 05/13/2019	04/30/2019 04/17/2019
	878	Crane, Bradley F. Perdue for Senate	\$30,000.00	03/11/2019	\$30,000.00	03/08/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/23/2019 05/13/2019
	879	Michigan Democratic State Central Committee O'Brien, Sancy	\$7,750.00	03/11/2019	\$7,750.00	03/12/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/24/2019 05/14/2019
	880	Massachusetts Democratic State Committee Yorkis, Paul G.	\$7,050.00	03/11/2019	\$7,050.00	04/01/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/24/2019 05/10/2019
	881	Democratic Party of South Carolina George, Victor F.	\$9,000.00	06/12/2019	\$9,000.00	05/31/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/26/2019 05/10/2019
	882	Democratic Party of Arkansas Vandiver, Dawna	\$7,900.00	06/13/2019	\$7,900.00	02/05/2019	\$0.00	Attend FEC seminar	05/13/2019	04/23/2019
	886	Kelly for Congress (M'S) Page, Fred H.	\$1,900.00	04/08/2019	\$1,900.00	03/25/2019	\$0.00	Attend FEC seminar	03/01/2020	10/26/2019
	887	Giamagno, Holly Brian Higgins for Congress	\$3,100.00	04/13/2019	\$3,100.00	03/22/2019	\$0.00	Conduct internal education program for employees or staff	05/13/2019	06/11/2019
	888	Maryland Policy Project PAC Metzger, Don	\$4,000.00	04/13/2019	\$4,000.00	04/09/2019	\$0.00	Committee will file for termination	05/13/2019	04/30/2019

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	891	Schoon-Akwa Campaign Committee Hubay, Scott	\$750.00	06/08/2019	\$750.00	05/30/2019	\$0.00	Attend FEC seminar	05/09/2020	05/26/2019
	892	The Congressman Joe Barton Committee Barton, Kristin	\$3,650.00	06/08/2019	\$3,650.00	06/30/2019	\$0.00	Committee w/ file for termination	07/06/2019	05/10/2019
	893	Neel, Sam C. SEAL PAC Supporting Elected American Leaders PAC	\$10,000.00	06/08/2019	\$10,000.00	06/25/2019	\$0.00	Attend FEC seminar	05/09/2020	
	894	American Future Fund	\$15,500.00	07/05/2019	\$15,500.00	05/19/2019	\$0.00	Other	09/03/2019	08/29/2019
	896	Americas PAC Donelson, Tom	\$1,500.00	06/08/2019	\$1,500.00	04/22/2019	\$0.00	Attend FEC seminar	05/09/2020	
	897	Marshall for Senate Garr, Ron	\$7,500.00	08/17/2019	\$7,500.00	07/24/2019	\$0.00	Attend FEC seminar	07/15/2020	12/02/2019
	898	Maryott for Congress Maryott, Brian	\$5,500.00	08/14/2019	\$5,500.00	08/22/2019	\$0.00	Attend FEC seminar Conduct & certify internal audit/reconciliation	07/15/2020	
	901	Fueller-Randall, Lee Principles First, Inc	\$4,900.00	08/14/2019	\$4,900.00	08/29/2019	\$0.00	Committee w/ file for termination	10/13/2019	
	904	Legislative Majority PAC Collinson, Eleanor	\$9,500.00	06/30/2019	\$9,500.00	10/31/2019	\$0.00	Attend FEC seminar Conduct & certify internal audit/reconciliation	08/20/2020 09/20/2020 06/20/2021	
	905	Putins, Scott Ohio Majority Trust	\$1,750.00	02/19/2020	\$1,750.00	12/13/2019	\$0.00	Attend FEC seminar	06/10/2020	

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
	906	Americans for the Cure of Breast Cancer Piero, Robert	\$8,000.00	09/26/2019	\$8,000.00	10/28/2019	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	08/26/2020 10/26/2019	 10/26/2019
	907	Tennessee Democratic Party McMillon, Geeta	\$2,100.00	09/20/2019	\$2,100.00	01/10/2020	\$0.00	Attend FEC seminar File amended reports	08/23/2020 09/20/2019	
	908	Tony Cardenas for Congress May, Jennifer	\$5,575.00	09/26/2019	\$5,575.00	09/27/2019	\$0.00	Conduct internal education program for employees or staff	11/19/2019	
	909	W + Justice Patel, Ja. Deepan	\$2,450.00	08/15/2019	\$2,450.00	09/17/2019	\$0.00	Develop a FEC Compliance Manual		
	910	National Rifle Association (NRA) Institute for Legislative Action Dwerns, Robert G	\$4,500.00	09/28/2019	\$4,500.00	09/10/2019	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	08/29/2020 11/27/2019	
	913	Mississippi Democratic Party Brown, Ryan	\$9,000.00	09/30/2019	\$9,000.00	11/05/2019	\$0.00	Attend FEC seminar	08/31/2020	
	915	Massachusetts Democratic State Committee Yonkis, Paul G.	\$8,000.00	09/30/2019	\$8,000.00	10/22/2019	\$0.00	Develop a FEC Compliance Manual	10/29/2019	
Sub-Total : FY-2019			\$265,755.00		\$257,205.00		\$8.00			
Grand Total :			\$265,755.00		\$257,205.00		\$8.00			

Administrative Fine Program Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$131,164	\$343,987	N/A

(b) (7)(E)

SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AGENDA DOCUMENT NO. X20-17
AGENDA ITEM
For meeting of May 12, 2020

April 30, 2020

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista Roche *KR*
Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Dayna C. Brown *DCB*
Acting Assistant Staff Director
Audit Division

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2020 – 2nd Quarter Highlights (1/1/20 – 3/31/20)

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the 2nd quarter FY 2020 (1/1/20 – 3/31/20). The intent of this document is to provide an update of the workload and achieved results of the Office of Compliance on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during an upcoming Executive Session.

The attached **Appendix A** provides the Commission with second quarter highlights for each office and also a statistical overview of FY 2020 results and progression towards meeting the goals outlined within the 2018-2022 Strategic Plan adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled ‘Proposed Final Audit Report – Due Date’ which highlights the report manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2020 statistics for meeting strategic performance goals related to the Administrative Fine Program. **Appendix F** (AF Penalties Assessed and Collected) shows the total amount of penalties assessed and collection rate for FY 2015 – 2020.

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the overview.

Alternative Dispute Resolution Office (ADRO)

In the second quarter of FY 2020, the ADRO received 7 cases. Of these, the Reports Analysis Division (RAD) referred 4 matters and the Office of General Counsel (OGC) transferred 3 matters. During this time period, the ADRO did not close any matters due to the loss of quorum. The Commission collected \$7,100 in civil penalties.

(b) (7)(E)

(b) (7)(E)
for a vote.

There are currently **41** matters pending with the Commission

In the second quarter of FY 2020, the ADRO focused on handling a high volume of cases (**47** active matters), including 10 audit eligible matters in which Committees will receive tailored training. In addition, ADRO staff proposed enhancements to its case management software, Law Manager and worked with OCIO to implement these proposals in order to increase office efficiency.

Administrative Fine Program (Office of Administrative Review)

During the second quarter of FY 2020, RAD processed 4 Reason to Believe (RTB) and 1 Final Determination recommendation memoranda, which are awaiting Commission vote. (b) (7)(E)

OAR had no new challenges to process in the second quarter. The Commission collected \$5,856 in fine payments.

In the second quarter, the Reviewing Officer continued to assist ADR and OGC with processing civil penalty payments and completing financial reports for OCFO. The Reviewing Officer attended in-house OPM facilitated training on Engaging and Encouraging Employees and

began participating in the Partnership for Public Service Engagement Coordinator Collective to assist the agency in engagement planning.

Audit Division (Audit)

During the second quarter of FY 2020, the Audit Division (Audit) processed the following audit reports:

	Audit Report Stage	Number of Reports
Released to Public	Final Audit Report	0
Sent to the Committee	Interim Audit Report	0
	Draft Final Audit Report	0
Circulated to the Commission	Interim Audit Report	0
	Audit Division Recommendation Memorandum	0
	Proposed Final Audit Report	0
Forwarded to OGC	Interim Audit Report	1
	Draft Final Audit Report	0
	Audit Division Recommendation Memorandum	0
	Total # of Audit Reports	1

Audit has a total of **18** open audits. Four of these audits are authorized committees and fourteen audits are unauthorized committees.

Two of the open audits are for the 2016 election cycle. One audit, in the Audit Division Recommendation Memorandum stage, remains with the OGC for legal analysis; and the second has been circulated to the Commission with a recommendation to transfer the matter to the ADRO for further processing.

Four of the open audits are for 2018 authorized committees. One audit is awaiting the committee's response to the interim audit report, two audits are in the interim audit report writing stage and the remaining audit is currently on hold given that Audit has not received the records necessary to commence the audit. (b) (5), (b) (7)(A)

The Audit Division will circulate an informational update to the Commission on this audit in May.

The remaining 12 open audits are for 2018 unauthorized committees. Fieldwork is in progress for all of the audits. Due to COVID-19, obtaining records has posed some challenges for some audits. Staff has made good progress on fieldwork for these audits despite some of the obstacles encountered. Exit conferences will begin in May, with two scheduled thus far.

(b) (7) (E)

With respect to the Presidential Election Campaign Fund (PECF), Audit continued forwarding the monthly PECF reports received from the U.S. Treasury, to the Office of Chief Information Officer (OCIO) for web placement. Audit addressed the following inquiries from the Commission's internal stakeholders: confirmed for the Enforcement Division that the Commission approved the August 2007 Guideline for Presentation in Good Order; verified the 2020 Voting Age Population and Cost of Living Adjustment calculations, as well as the 2020 Presidential Spending Limits for the Information Division; periodically affirmed for the Press Office and Information Division that no matching fund applications had been received; and updated the Office of Compliance briefing book for the PECF information. For external stakeholders, Audit provided the U.S. Treasury Department with PECF-related edits for the 2019 Oversight Inquiry and answered questions related to the calculation of the budget estimates. Finally, Audit completed its own training manual detailing processes related to various aspects of the PECF review and administration.

(b) (5)

Audit management collaborated with OPM to update the performance standards for the GS-7, 9, and 11 Auditor positions and the standards are in the process of being finalized. In March the Audit management team also received recommendations from Audit staff stemming from the 2019 Federal Employee Viewpoint Survey results, which included specific ideas presented to management on what would help to improve the division. Audit management has implemented several of the recommendations and looks forward to continuing to do so.

With regard to training, Audit held division-wide training on Audit Division Quality Standards in January and Auditors and Managers continue to complete courses to satisfy the requirement to complete 80 hours of Continuing Professional Education every two years. Additionally, Audit Managers attended the in-house OPM facilitated training on Engaging and Encouraging Employees in February.

Following the recent retirements of several auditors and an Audit Manager, and the transfer of one Auditor to the agency's Office of the Inspector General, the Commission approved the hiring of four Auditors and one Audit Manager. Audit has selected two external Auditors and an Audit Manager and looks forward to bringing these new hires onboard once background checks are complete and laptops are able to be issued given the current telework environment. We have also selected a RAD Analyst with prior audit experience who will transfer to Audit in early May, and we are in the process of working with HR Solutions to announce and fill our fourth and final approved Auditor vacancy.

Reports Analysis Division (RAD)

During the second quarter of FY 2020, RAD continued to play a critical role in the development of the NextGen electronic filing system by making suggestions for improvements and enhancements and conducting testing to confirm the software reflects the reporting requirements for Form 3X filers. Requirements gathering and development of Forms 3 and 3P has begun with the other forms to follow. Also during the second quarter, RAD collaborated with OGC on COVID-19 guidance concerning paper filings and collaborated with OCIO to develop a process for accepting pdf filings from paper Form 5 and Form 9 filers. In addition, RAD created a Federal Employee Viewpoint Survey (FEVS) working group to develop solutions to areas where improvement is needed based on the survey results. RAD Management has implemented several solutions to address the issues identified.

During the second quarter RAD staff reviewed a total of 20,791 documents totaling 7,070,636 pages and 94.5% of the reports were reviewed within 90 days of receipt, thus exceeding the strategic goal of 75% of reports reviewed within 90 days of receipt. RAD generated and sent 2,260 letters to the filing community and 87% of RFAs were sent within 40 days of the report

review date. Also during the second quarter, RAD generated 5 referrals (1 OGC, 4 ADRO) and sent 1,237 non-filer notices where the Commission approved recommendations to publish 27 authorized committees for failure to timely file an election-sensitive report. In addition, RAD staff handled 3,460 phone calls and 236 emails. Finally, the Reports Processing Branch coded 21,225,101 transactions, 1,149 documents and processed 9,852 pages from 891 documents in the Paper Conversion system.

RAD received a resignation from an Assistant Branch Chief on the Party/Non-Party Branch during the second quarter. Upon approval to backfill this position, a selection was made for a 120-day detail. We also received approval to fill two (2) additional CFA positions and will begin the backfill process in the near future. In addition, RAD Management revised and finalized the performance standards for the Coding Clerk position, are in the process of revising the performance standards for the Campaign Finance Analyst positions, and all RAD managers received Mid-Year performance assessments.

Attachments

Appendix A, FY 2020 Highlights and FY Overview for Office of Compliance Goals

Appendix B, Open Audits Report

Appendix C, Proposed Final Audit Report – Due Date

Appendix D, ADR Civil Penalty Report

Appendix E, AF Performance Goals Report

Appendix F, AF Penalties Assessed and Collected

Status of Compliance

FY 2020
(10/1/2019 – 3/31/2020)

Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20 (3/31/20)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%	94.1%	98.3%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	99.0%	99.9%	99.8%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%	100%

Matters Awaiting a Commission Vote as of 4/30/20

Audit	Admin Fine Program/OAR	ADRO	Total
2	25/3	41	71

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2020 Performance Goals	Status 3/31/20
RAD staff collaborated with OCIO on the development and baseline testing of FEC Form 3X for the NextGen Efiling System.	Form 3X is expected to be completed and fully tested in the third quarter of FY2020, with the other forms to follow.
RAD staff collaborated with the Information Division on reporting & FECfile webinars for Candidate Committees, PACs and Party Committees, on the FEC regional conference for all committee types in San Antonio, and on Independent Expenditure webinars.	Candidate, PAC and Party reporting and FECfile webinars were held in January 2020, the regional conference was held in February 2020, and the Independent Expenditure webinars and another candidate webinar were held in March 2020.
RAD commenced an electronic filing working group to develop feedback and formulate solutions to improve both customer service and knowledge of the electronic filing system.	The group met in March 2020 to brainstorm ideas. Future meetings will address ways to improve customer service including assisting the Electronic Filing Office (EFO) during filing deadlines, establishing procedures for transferring calls, and cross training analysts to assist with technical issues.

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 2: Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20
RAD to review 75% of reports within 90 days of receipt	79.3%	92.9%	76.6%	92.2%	76%	91.5%
RAD to send 75% of RFAs within 40 days of report review	92%	92%	88%	88%	85%	86%
(b) (7)(E)	93.5%	100%	96.2%	96.9%	88%	100%
	43%	56%	25%	45%	100%	N/A ¹
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	97%	81.8%	96.67%	100%	97%	100%
(b) (7)(E)	100%	100%	100%	99%	100%	100%

1 - No PFARs were circulated this quarter

Strategic Objective 4: Foster a Culture of High Performance

Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20 (3/31/20)
RAD	Documents/ Transactions Coded	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828	1,936/ 27,292,434
	Documents/Pages Processed in Paper Automation/ Conversion System	N/A	N/A	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417	1,362/ 14,789
	Documents/Pages Reviewed	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699	36,840/ 18,396,209
	Letters sent	13,433	13,253	14,796	13,763	12,562	5,572
	Telephone calls handled	11,822	12,362	11,634	13,036	13,149	5,871
	Email inquiries handled	N/A	N/A	N/A	396	658	404
	Referrals	91	43	95	46	82	14
	AF Cases RTB/FD	191/159	83/33	163/168	95/23	262/93	0/0
Audit	(b) (7)(E)						
ADRO							
OAR	Cases Received	35	12	29	8	37	1
	Cases Closed (FD)	32	11	32	10	36	0



Open Audits

As of 4/30/2020

(Confidential and Sensitive)

			<u>Date of Last Action</u>	<u>Audit Manager</u>	<u>Report Track</u>
Fieldwork					
(b) (3) (A)					
2018	DEMOCRACY ENGINE, INC., PAC	C00468314	02/05/2020	Burgess	B
2018	NATIONAL TOOLING & MACHINING ASSOCIATION (NTMA) COMMITTEE FOR A STRONG ECONOMY	C00043091	02/27/2020	Lee	B
(b) (3) (A)					
2018	DEMOCRATIC FOUNDATION OF ORANGE COUNTY	C00176420	03/05/2020	Smith	B
2018	REPUBLICAN PARTY OF MINNESOTA - FEDERAL	C00001313	03/09/2020	Morcomb	B
2018	CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE	C00167320	03/09/2020	Pacious	B
(b) (3) (A)					
2018	GRASSROOTS VICTORY PAC	C00608380	03/30/2020	Burgess	B
2018	THE UTE PAC	C00626671	04/16/2020	Morcomb	B
Total - 13					
Interim/Preliminary Report Writing					
2018	MIKE BRAUN FOR INDIANA	C00653147	03/18/2020	Morcomb	B
2018	DR. RAUL RUIZ FOR CONGRESS	C00502575	04/29/2020	Smith	B
Total - 2					
Interim/Preliminary Audit Report Committee Response Period					
2018	VAN DREW FOR CONGRESS	C00661868	04/01/2020	Burgess	B
Total - 1					
Audit Division Recommendation Memorandum Writing					
2016	MISSISSIPPI REPUBLICAN PARTY	C00084368	01/17/2020	Pacious	B
Total - 1					
Audits with the Commission					
2016	THE 2016 COMMITTEE	C00569905	IAR 10/28/2019	Favin	B
Total - 1					



Open Audits

As of 4/30/2020
(Confidential and Sensitive)

18 Open Audits

Legend

Track A	Audits with <u>no</u> unresolved legal issues
Track B	State/Local Party audits with findings PAC audits with unresolved legal issues Authorized audits with unresolved legal issues
Track C	Audits with <u>no</u> findings
IAR	Interim Audit Report
PAR	Preliminary Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report
Text	If text is red, the report has not been sent to OGC for a legal analysis



Open Audits
As of 4/30/2020
(Confidential and Sensitive)

Audit Caseload

Audit Manager	Number of Audits	Percent of Total Audits ¹
Burgess	4	22%
Favin	1	6%
Lee	1	6%
Morcomb	3	17%
Pacious	4	22%
Smith	5	28%
Totals	18	100%

¹ May not total 100% due to rounding



Open Audits

As of 4/30/2020

(Confidential and Sensitive)

Comments

2016

Mississippi Republican Party

(b) (5)

The 2016 Committee

(b) (5)

2018

(b) (3) (A)

(b) (5)

(b) (3) (A)

(b) (5)

Connecticut Democratic State Central Committee

(b) (5)

Democracy Engine PAC

(b) (5)

Democratic Foundation of Orange County

(b) (5)

(b) (3) (A)

(b) (5)

Dr. Raul Ruiz for Congress

(b) (5)

Grassroots Victory PAC

(b) (5)

(b) (3) (A)

(b) (5)

Mike Braun for Indiana

(b) (5)

National Tooling & Machining Association Committee for a Strong Economy

(b) (5)

Republican Party of Minnesota - Federal

(b) (5)

(b) (3) (A)

(b) (5)

The UTE PAC

(b) (5)



Open Audits

As of 4/30/2020

(Confidential and Sensitive)

(b) (3) (A)
(b) (5)

Van Drew for Congress

(b) (5)



Proposed Final Audit Report - Due Date

As of 4/30/2020

(Confidential and Sensitive)

	<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2016 THE 2016 COMMITTEE	Favin	IAR	Circulated to Commission	11/29/2017
2016 MISSISSIPPI REPUBLICAN PARTY	Pacious	ADRM	Memorandum Writing	01/26/2018
2018 DR. RAUL RUIZ FOR CONGRESS	Smith	IAR	Report Writing	04/25/2019
2018 VAN DREW FOR CONGRESS	Burgess	IAR	Committee Response Period	04/25/2019
2018 MIKE BRAUN FOR INDIANA	Lmorcomb	IAR	Report Writing	04/25/2019
2018 REPUBLICAN PARTY OF MINNESOTA - FEDERAL	Lmorcomb		Fieldwork	10/02/2019

(b) (7)(E)

(b) (3) (A)

2018 NATIONAL TOOLING & MACHINING ASSOCIATION (NTMA) COMMITTEE FOR A STRONG ECONOMY	Lee		Fieldwork	10/02/2019
2018 CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE	Pacious		Fieldwork	10/02/2019
2018 DEMOCRATIC FOUNDATION OF ORANGE COUNTY	Smith		Fieldwork	10/02/2019

(b) (3) (A)

(b) (3) (A)

2018 DEMOCRACY ENGINE, INC., PAC	Burgess		Fieldwork	10/02/2019
2018 GRASSROOTS VICTORY PAC	Burgess		Fieldwork	10/02/2019

(b) (3) (A)

2018 THE UTE PAC	Lmorcomb		Fieldwork	10/02/2019
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(b) (3) (A)



Proposed Final Audit Report - Due Date

As of 4/30/2020

(Confidential and Sensitive)

18 Open Audits

Legend

IAR	Interim Audit Report
PAR	Preliminary Audit Report
DFAR	Draft Final Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year: 10/01/2018 To: 09/30/2020

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY -2019	821	Kind For Congress Committee Smith, Brent	\$5,800.00	03/13/2019	\$5,800.00	03/13/2019	\$0.00	Attend FEC seminar	02/11/2020	11/20/2019
	852	American Principles Laor, Eytan	\$5,000.00	12/19/2018	\$5,000.00	11/20/2018	\$0.00	Attend FEC seminar File amended reports	11/19/2019 01/18/2019	10/02/2019 01/22/2019
	858	Wolfson, Howard Independence USA PAC	\$4,000.00	03/09/2019	\$4,000.00	02/26/2019	\$0.00	None		
	865	Rights & Democracy Action Stockinger, Peri	\$1,250.00	11/03/2018	\$1,250.00	10/15/2018	\$0.00	Committee will file for termination	12/03/2018	10/12/2018
	871	Equality Pennsylvania Dungee, Joseph	\$5,900.00	10/18/2020				Attend FEC seminar	10/18/2019	
	872	Kilgore, Paul McSally for Congress	\$23,400.00	08/01/2019	\$23,400.00	07/31/2019	\$0.00	None		
	873	Urban Victory Fund (UVF) Kinchin, Drue	\$750.00	11/17/2018	\$750.00	11/01/2018	\$0.00	Attend FEC seminar File amended reports	10/18/2019 11/17/2018	 09/13/2018
	874	Hornaday, Alexander Restore American Freedom and Liberty	\$2,650.00	12/26/2018				Conduct & certify internal audit/reconciliation	11/26/2019	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	877	Arizona Republican Party Lettieri, Bob	\$45,000.00	11/13/2019	\$45,000.00	01/06/2020	\$0.00	File amended reports Meet with RAD staff	05/12/2019 05/12/2019	04/30/2019 04/17/2019
	878	Crate, Bradley T. Perdue for Senate	\$30,000.00	03/11/2019	\$30,000.00	03/08/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/22/2019 05/13/2019
	879	Michigan Democratic State Central Committee O'Brien, Sandy	\$7,750.00	03/11/2019	\$7,750.00	03/12/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/24/2019 05/14/2019
	880	Massachusetts Democratic State Committee Yorkis, Paul G.	\$7,050.00	03/11/2019	\$7,050.00	04/01/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/24/2019 05/10/2019
	881	Democratic Party of South Carolina George, Velva E.	\$9,000.00	08/12/2019	\$9,000.00	05/31/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/26/2019 05/10/2019
	882	Democratic Party of Arkansas Vandiver, Dawne	\$7,900.00	05/13/2019	\$7,900.00	02/05/2019	\$0.00	Attend FEC seminar	05/13/2019	04/22/2019
	886	Kelly for Congress (MS) Page, Fred H.	\$1,900.00	04/06/2019	\$1,900.00	03/25/2019	\$0.00	Attend FEC seminar	03/07/2020	10/29/2019
	887	Giarraputo, Holly Brian Higgins for Congress	\$3,100.00	04/13/2019	\$3,100.00	03/22/2019	\$0.00	Conduct internal education program for employees or staff	06/13/2019	06/11/2019
	888	Marijuana Policy Project PAC Murphy, Don	\$4,000.00	04/13/2019	\$4,000.00	04/09/2019	\$0.00	Committee will file for termination	05/13/2019	04/30/2019

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	891	Scholten4Iowa Campaign Committee Hubay, Scott	\$750.00	06/08/2019	\$750.00	05/30/2019	\$0.00	Attend FEC seminar	05/09/2020	06/26/2019
	892	The Congressman Joe Barton Committee Barton, Kristin	\$3,680.00	06/08/2019	\$3,680.00	05/30/2019	\$0.00	Committee will file for termination	07/08/2019	06/10/2019
	893	Neel, Sam C. SEAL PAC Supporting Electing American Leaders PAC	\$10,000.00	06/08/2019	\$10,000.00	06/25/2019	\$0.00	Attend FEC seminar	05/09/2020	05/22/2020
	894	American Future Fund	\$15,600.00	07/05/2019	\$15,600.00	06/19/2019	\$0.00	Other	09/03/2019	08/29/2019
	896	Americas PAC Donelson, Tom	\$1,500.00	06/08/2019	\$1,500.00	04/22/2019	\$0.00	Attend FEC seminar	05/09/2020	04/22/2020
	897	Marsha for Senate Gant, Ron	\$7,500.00	08/17/2019	\$7,500.00	07/24/2019	\$0.00	Attend FEC seminar	07/18/2020	10/02/2019
	898	Maryott for Congress Maryott, Brian	\$5,500.00	08/14/2019	\$5,500.00	08/22/2019	\$0.00	Attend FEC seminar Conduct & certify internal audit/reconciliation	07/15/2020 07/15/2020	
	901	Pullen, Randall Lee Principles First, Inc.	\$4,900.00	08/14/2019	\$4,900.00	08/26/2019	\$0.00	Committee will file for termination	10/13/2019	10/04/2019
	904	Legislative Majority PAC Collinson, Eleanor	\$9,500.00	09/30/2019	\$9,500.00	10/31/2019	\$0.00	Attend FEC seminar Conduct & certify internal audit/reconciliation	08/20/2020 08/20/2020 08/20/2021	
	905	Pullins, Scott Ohio Majority Trust	\$1,750.00	02/19/2020	\$1,750.00	12/13/2019	\$0.00	Attend FEC seminar	08/19/2020	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	906	Americans for the Cure of Breast Cancer Piaro, Robert	\$9,000.00	09/26/2019	\$9,000.00	10/29/2019	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	08/26/2020 10/26/2019	 10/25/2019
	907	Tennessee Democratic Party McMillan, Geeta	\$2,100.00	09/20/2019	\$2,100.00	01/10/2020	\$0.00	Attend FEC seminar File amended reports	08/20/2020 09/20/2019	 09/17/2019
	908	Tony Cardenas for Congress May, Jennifer	\$5,575.00	09/26/2019	\$5,575.00	09/27/2019	\$0.00	Conduct internal education program for employees or staff	11/19/2019	11/19/2019
	909	Win Justice Pateriya, Deepak	\$2,450.00	09/15/2019	\$2,450.00	09/17/2019	\$0.00	Develop a FEC Compliance Manual	08/15/2020	
	910	National Rifle Association (NRA) Institute for Legislative Action Owens, Robert G.	\$4,500.00	09/28/2019	\$4,500.00	09/10/2019	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	08/29/2020 11/27/2019	03/27/2019 03/18/2020
	913	Mississippi Democratic Party Brown, Ryan	\$9,000.00	09/30/2019	\$9,000.00	11/05/2019	\$0.00	Attend FEC seminar	08/31/2020	
	915	Massachusetts Democratic State Committee Yorkis, Paul G.	\$8,000.00	09/30/2019	\$8,000.00	10/22/2019	\$0.00	Develop a FEC Compliance Manual	10/29/2019	10/15/2019
Sub-Total : FY -2019			\$265,755.00		\$257,205.00		\$0.00			
Grand Total :			\$265,755.00		\$257,205.00		\$0.00			



AF Performance Goals

Print Date: April 30, 2020

Selected Parameters:

Office: Both

Start Date: 10/01/2019

End Date: 03/31/2020

*Exception: YES



AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
Processed						
2019	YE	H_S_P_UNAUTH	N	01/31/2020	03/26/2020	
2019	M12	P_UNAUTH	N	12/20/2019	02/12/2020	
2019	M11	P_UNAUTH	N	11/20/2019	01/13/2020	
2019	M10	P_UNAUTH	N	10/20/2019	12/04/2019	
2019	Q3	H_S_P	N	10/15/2019	12/04/2019	
2019	M9	P_UNAUTH	N	09/20/2019	11/18/2019	
2019	M8	P_UNAUTH	N	08/20/2019	10/08/2019	
Total AF Reports Processed			7			
Average Processing Days			52.29			
(b) (7)(E)						
Percentage to Goal			100.00%			

Processed - No committees				Action Date		(b) (7)(E)
2019	M10	P_UNAUTH	Y	10/20/2019	12/05/2019	
2019	Q3	H_S_P	Y	10/15/2019	12/05/2019	
2019	30SG	AUTH	N	10/10/2019	11/18/2019	
2019	12SG	AUTH	Y	08/29/2019	10/28/2019	
2020	12SP	AUTH	Y	02/06/2020	03/30/2020	
2020	12SP	AUTH	Y	01/23/2020	03/23/2020	
Total AF Reports Processed-No Committees			6			
Average Processing Days			51.50			
(b) (7)(E)						
Percentage to Goal			100.00%			



AF Performance Goals

(Confidential and Sensitive)

Total AF Reports 13

Average Processing Days 51.92

(b) (7)(E)

Percentage to Goal 100.00%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters
RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2018	48H	3730	C00665554	09/30/2019	11/21/2019	52	Y
2018	48H	3738	C00675215	10/21/2019	12/12/2019	52	Y

Total Challenges Processed 2

Average Processing Days 52.00

Total Reports Processed within 60 Days 2

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

Administrative Fine Program Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$131,164	\$343,987	N/A

(b) (7)(E)

RECEIVED

By Office of the Commission Secretary at 10:25 am, Jul 31, 2020



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

July 31, 2020

MEMORANDUM

AGENDA DOCUMENT NO. X20-36
AGENDA ITEM
For the meeting of August 18, 2020

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista Roche *KR*
Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Dayna C. Brown *DCB*
Acting Assistant Staff Director
Audit Division

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2020 – 3rd Quarter Highlights (4/1/20 – 6/30/20)

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the 3rd quarter FY 2020 (4/1/20 – 6/30/20). The intent of this document is to provide an update of the workload and achieved results of the Office of Compliance on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during an upcoming Executive Session.

The attached **Appendix A** provides the Commission with third quarter highlights for each office and a statistical overview of FY 2020 results and progression towards meeting the goals outlined within the 2018-2022 Strategic Plan adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled ‘Proposed Final Audit Report – Due Date’ which highlights the report manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2020 statistics for meeting strategic performance goals related to the Administrative Fine Program. **Appendix F** (AF Penalties Assessed and Collected) shows the total amount of penalties assessed and collection rate for FY 2015 – 2020.

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the overview.

Alternative Dispute Resolution Office (ADRO)

In the third quarter of FY 2020, the ADRO received 8 cases. Of these, the Reports Analysis Division (RAD) referred 6 matters and the Office of General Counsel (OGC) transferred 2 matters. During this time period, the ADRO only closed 2 matters due to the loss of quorum. The Commission assessed \$17,950 in civil penalties.

During the third quarter, the ADRO circulated recommendations in 8 matters. (b) (7)(E)

There are currently 9 matters pending with the Commission for a vote.

In the third quarter of FY 2020, the ADRO focused on handling a high volume of cases (53 active matters), including 10 audit eligible matters in which Committees will receive tailored training. In addition, ADRO staff continued to work with OCIO to implement enhancements to its case management software, Law Manager, in order to increase office efficiency.

Administrative Fine Program (Office of Administrative Review)

During the third quarter of FY 2020, RAD processed 10 Reason to Believe (RTB) memoranda. (b) (7)(E)

OAR had no new challenges to process in the third quarter.

The Commission approved RAD’s RTB recommendations in 96 cases. In addition, the Commission made a final determination that the respondents in 206 cases violated 52 U.S.C. § 30104(a) and assessed \$531,552 in civil penalties. The Commission collected \$5,113 in fine payments.

In the third quarter, the Reviewing Officer collaborated with OCIO to launch a redesigned Administrative Fine Calculator for the website. The Reviewing Officer also worked with OGC and RAD to implement new procedures for the receipt of AF challenge documentation during COVID-19, which will now be submitted via email. With the high volume of RTB findings approved at the end of the third quarter, OAR expects to receive a high volume of challenges in the fourth quarter of FY 2020.

Audit Division (Audit)

During the third quarter of FY 2020, the Audit Division (Audit) processed the following audit reports:

	Audit Report Stage	Number of Reports
Released to Public	Final Audit Report	0
Sent to the Committee	Interim Audit Report	2
	Draft Final Audit Report	1
Circulated to the Commission	Interim Audit Report (<i>informational</i>)	2
	Audit Division Recommendation Memorandum	1
	Proposed Final Audit Report	0
Forwarded to OGC	Interim Audit Report	2
	Draft Final Audit Report	1
	Audit Division Recommendation Memorandum	1
	Total # of Audit Reports	10

Audit has a total of 17 open audits. Four of these audits are authorized committees and thirteen audits are unauthorized committees.

There is one 2016 cycle audit that remains open and is awaiting Commission approval of the Audit Division Recommendation Memorandum.

For the 2018 cycle, there are sixteen open audits, four of which are for authorized committees. Of the four audits, one audit is in the draft final audit report writing stage and two audits are with the Office of General Counsel's Compliance Advice Team (OGC-CAT) for legal analysis and the remaining audit is currently on hold given that Audit has not received the records necessary to commence the audit. (b) (5), (b) (7)(A)

The Audit Division circulated an informational update to the Commission on May 27, 2020 and will provide another update in August.

The remaining 12 open audits are for unauthorized committees. Fieldwork is concluding for nine of the audits, with exit conferences scheduled to take place in August. Two audits are in the interim audit report writing stage and one audit is awaiting the committee's response to the interim audit report.

COVID-19 impacted Audit's ability to obtain records in some audits. Audit staff, in partnership with OGC-CAT, has procured tolling agreements in four such audits to preserve the Commission's ability to pursue any potential enforcement action, and the audits continue to progress despite the obstacles encountered.

(b) (7) (E)

With respect to the Presidential Election Campaign Fund (PECF), Audit forwarded three 508 accessibility compliant monthly PECF reports received from the U.S. Treasury, to the Office of Chief Information Officer (OCIO) for web placement. Audit addressed an inquiry from the Commission's Office of General Counsel - Policy Division regarding a potential rulemaking to address the Commission's modified operations during the pandemic. Audit was asked if there was anything that might be helpful to include in the rulemaking to better facilitate submissions related

to the Presidential Matching Funds. (b) (5)

For internal stakeholders, Audit confirmed that no matching fund applications had been received. Audit also coordinated with the Information Division on the yearly Consumer Price Index letter from the Bureau of Labor Statistics. Once available, Audit will forward this letter to the U.S. Treasury Department, per its' request.

(b) (5)

With regard to training, Audit ensured that Auditors and Managers had access to on-line auditing and accounting courses needed to satisfy the 80 hours of required Continuing Professional Education every two years. Additionally, Audit Managers held regular team meetings to keep auditors apprised of new information, monitor the status of open audits and engage staff in team collaboration in this virtual environment.

Audit welcomed one new Auditor in the 3rd quarter and completed RAD campaign guide training and in-depth Audit training. Audit will welcome one additional Auditor and an Audit Manager in early August and is in the process of reviewing applications for the remaining two approved Auditor new hires. Audit finalized the updated GS-7 and GS-9 Auditor performance standards and continues to research various electronic workpaper options, as the current system is slated for a 2023 end-of-life.

Reports Analysis Division (RAD)

During the third quarter of FY 2020, RAD Reports Processing Branch staff volunteered to report to the building in order to scan and process paper reports as part of the Phase 1 reopening of agency operations. Due to their efforts, the backlog of reports that resulted from the suspension of mail are now on the public record. In addition, RAD staff conducted in-depth user acceptance testing on Form 3X for the NextGen Efiling program and collaborated with OCIO on identifying and assessing contract requirements. Also during the third quarter, RAD managers reviewed and commented on Business Process Analysis and Mission Essential Function worksheets concerning RAD processes for the FEC Continuity of Operations Plan (COOP), and completed surveys for

division programs and processes from Amazon Web Services (AWS) who is analyzing how best to modernize the FEC's infrastructure and internal applications as part of the IT Modernization Project.

During the third quarter RAD staff reviewed a total of 23,734 documents totaling 31,436,243 pages and 91.8% of the reports were reviewed within 90 days of receipt, thus exceeding the strategic goal of 75% of reports reviewed within 90 days of receipt. RAD generated and sent 1,931 letters to the filing community and 85% of RFAIs were sent within 40 days of the report review date. Also during the third quarter, RAD generated 14 referrals (1 OGC, 6 ADRO, 2 Administrative Fine, 5 Administrative Termination) and sent 2,036 non-filer notices where the Commission approved recommendations to publish 37 authorized committees for failure to timely file an election-sensitive report. In addition, RAD staff handled 3,529 phone calls and 285 emails. Finally, the Reports Processing Branch coded 17,877,651 transactions and 438 documents.

RAD committed extensive resources in the area of training and outreach during the third quarter. The division held a professional development month for staff where virtual training sessions were offered throughout each week on a variety of topics. In addition, RAD held a division-wide customer service virtual training session and approved several individual staff requests for training opportunities. RAD also assisted other offices with training and outreach, conducting Party and PAC training for Audit Division staff and collaborating with the Information Division to present nine reporting and FECfile webinars to the filing community.

In the area of personnel during third quarter, a Campaign Finance Analyst (CFA) transferred to the Audit Division and a 120-day detail for an Assistant Branch Chief on the Party/NonParty branch was filled. Upon receiving approval to fill CFA, Coding Clerk, Data Disclosure Assistant, Assistant Branch Chief, and Supervisory Training and Program Manager positions, we are in the process of working with HR Solutions on these postings and expect to fill them by the end of FY 2020. In addition, RAD Management revised and finalized the performance standards for the Campaign Finance Analyst positions.

Attachments

Appendix A, FY 2020 Highlights and FY Overview for Office of Compliance Goals

Appendix B, Open Audits Report

Appendix C, Proposed Final Audit Report – Due Date

Appendix D, ADR Civil Penalty Report

Appendix E, AF Performance Goals Report

Appendix F, AF Penalties Assessed and Collected

Status of Compliance

FY 2020
(10/1/2019 – 6/30/2020)

Matters Awaiting a Commission Vote as of 7/31/20

Audit	Admin Fine Program/OAR	ADRO	Total
1	2/2	9	14

Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20 (6/30/20)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%	94.1%	99%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	99.0%	99.9%	99.8%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%	100%

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2020 Performance Goals	Status 6/30/20
RAD staff provided extended phone coverage from 5:30pm to 8:00pm for the 2020 July Quarterly reporting deadline.	The RAD mainline received and directed 55 calls between 5:30pm and 8:00pm on the April 15 th deadline.
RAD staff collaborated with the Information Division on nine (9) reporting & FECfile webinars for Candidate Committees, corporate, labor/member, and trade PACs, and Party Committees.	Party reporting and FECfile webinars were held in April 2020, corporate and labor/member PAC reporting webinars were held in May 2020, and Candidate and trade PAC reporting and FECfile webinars were held in June 2020.
RAD Assistant Staff Director provided a Best Practices for FEC Reporting and Compliance session for a national party legal compliance webinar.	The webinar was held in May 2020.

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 2: Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20
RAD to review 75% of reports within 90 days of receipt	79.3%	92.9%	76.6%	92.2%	76%	91.6%
RAD to send 75% of RFAs within 40 days of report review	92%	92%	88%	88%	85%	86%
(b) (7)(E)	93.5%	100%	96.2%	96.9%	88%	100%
	43%	56%	25%	45%	100%	N/A ¹
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	97%	81.8%	96.67%	100%	97%	100%
(b) (7)(E)	100%	100%	100%	99%	100%	100%

1 - No PFARs were circulated this quarter

Strategic Objective 4: Foster a Culture of High Performance

Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20 (6/30/20)
RAD	Documents/ Transactions Coded	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828	2,274/ 45,170,085
	Documents/Pages Processed in Paper Automation/ Conversion System	N/A	N/A	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417	1,362/ 14,789
	Documents/Pages Reviewed	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699	60,558/ 49,832,324
	Letters sent	13,433	13,253	14,796	13,763	12,562	9,538
	Telephone calls handled	11,822	12,362	11,634	13,036	13,149	9,400
	Email inquiries handled	N/A	N/A	N/A	396	658	689
	Referrals	91	43	95	46	82	28
	AF Cases RTB/FD	191/159	83/33	163/168	95/23	262/93	98/221
Audit	(b) (7)(E)						
ADRO							
OAR	Cases Received	35	12	29	8	37	1
	Cases Closed (FD)	32	11	32	10	36	2



Open Audits

As of 7/31/2020
(Confidential and Sensitive)

			<u>Date of Last Action</u>	<u>Audit Manager</u>	<u>Report Track</u>
Fieldwork					
(b) (3) (A)					
(b) (3) (A)					
2018	REPUBLICAN PARTY OF MINNESOTA - FEDERAL	C00001313	03/09/2020	Morcomb	B
2018	CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE	C00167320	03/09/2020	Pacious	B
(b) (3) (A)					
2018	THE UTE PAC	C00626671	04/16/2020	Morcomb	B
				Total - 9	
Interim/Preliminary Report Writing					
2018	DEMOCRACY ENGINE, INC., PAC	C00468314	05/27/2020	Burgess	B
2018	NATIONAL TOOLING & MACHINING ASSOCIATION (NTMA) COMMITTEE FOR A STRONG ECONOMY	C00043091	06/03/2020	Lee	B
				Total - 2	
Interim/Preliminary Audit Report Committee Response Period					
2018	GRASSROOTS VICTORY PAC	C00608380	07/06/2020	Burgess	B
				Total - 1	
Draft Final Audit Report Writing					
2018	DR. RAUL RUIZ FOR CONGRESS	C00502575	07/20/2020	Smith	B
				Total - 1	
Audit Division Recommendation Memorandum Writing					
2018	VAN DREW FOR CONGRESS	C00661868	07/29/2020	Burgess	B
				Total - 1	
Proposed Final Audit Report Writing					
2018	DEMOCRATIC FOUNDATION OF ORANGE COUNTY	C00176420	06/11/2020	Smith	C
				Total - 1	
Audits in OGC					
2018	MIKE BRAUN FOR INDIANA	C00653147	IAR 07/02/2020	Morcomb	B
				Total - 1	
Audits with the Commission					
2016	MISSISSIPPI REPUBLICAN PARTY	C00084368	ADRM 06/05/2020	Pacious	B
				Total - 1	



Open Audits

As of 7/31/2020
(Confidential and Sensitive)

17 Open Audits

Legend

Track B	Audits with findings
Track C	Audits with <u>no</u> findings
IAR	Interim Audit Report
PAR	Preliminary Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report
Text	If text is red, the report has not been sent to OGC for a legal analysis



Open Audits

As of 7/31/2020
(Confidential and Sensitive)

Audit Caseload

<u>Audit Manager</u>	<u>Number of Audits</u>	<u>Percent of Total Audits</u> ¹
Burgess	4	24%
Lee	1	6%
Morcomb	3	18%
Pacious	4	24%
Smith	5	29%
Totals	17	100%

¹ May not total 100% due to rounding



Open Audits

As of 7/31/2020

(Confidential and Sensitive)

Comments

2016

Mississippi Republican Party

(b) (5)

2018

(b) (3) (A)

(b) (5)

(b) (3) (A)

(b) (5)

Connecticut Democratic State Central Committee

(b) (5)

Democracy Engine PAC

(b) (5)

Democratic Foundation of Orange County

(b) (5)

(b) (3) (A)

(b) (5)

Dr. Raul Ruiz for Congress

(b) (5)

Grassroots Victory PAC

(b) (5)

(b) (3) (A)

(b) (5)

Mike Braun for Indiana

(b) (5)

National Tooling & Machining Association Committee for a Strong Economy

(b) (5)

Republican Party of Minnesota - Federal

(b) (5)

(b) (3) (A)

(b) (5)

The UTE PAC

(b) (5)

(b) (3) (A)

(b) (5)



Open Audits

As of 7/31/2020

(Confidential and Sensitive)

Van Drew for Congress
(b) (5)



Proposed Final Audit Report - Due Date

As of 7/31/2020

(Confidential and Sensitive)

(b) (7)(E)

	<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2016 MISSISSIPPI REPUBLICAN PARTY	Pacious	ADRM	Circulated to Commission	01/26/2018
2018 DR. RAUL RUIZ FOR CONGRESS	Smith	DFAR	Report Writing	04/25/2019
2018 VAN DREW FOR CONGRESS	Burgess	ADRM	Memorandum Writing	04/25/2019
2018 MIKE BRAUN FOR INDIANA	Lmorcomb	IAR	OGC Reviewing	04/25/2019
2018 DEMOCRACY ENGINE, INC., PAC	Burgess	IAR	Report Writing	10/02/2019
2018 NATIONAL TOOLING & MACHINING ASSOCIATION (NTMA) COMMITTEE FOR A STRONG ECONOMY	Lee	IAR	Report Writing	10/02/2019
2018 DEMOCRATIC FOUNDATION OF ORANGE COUNTY	Smith	IAR	Report Writing	10/02/2019
2018 GRASSROOTS VICTORY PAC	Burgess	IAR	Committee Response Period	10/02/2019
2018 REPUBLICAN PARTY OF MINNESOTA - FEDERAL	Lmorcomb		Fieldwork	10/02/2019

(b) (3) (A)

2018 CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE	Pacious		Fieldwork	10/02/2019
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(b) (3) (A)
(b) (3) (A)

(b) (3) (A)

2018 THE UTE PAC	Lmorcomb		Fieldwork	10/02/2019
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(b) (3) (A)



Proposed Final Audit Report - Due Date

As of 7/31/2020

(Confidential and Sensitive)

17 Open Audits

Legend

- IAR Interim Audit Report
- PAR Preliminary Audit Report
- DFAR Draft Final Audit Report
- ADRM Audit Division Recommendation Memorandum
- PFAR Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year: 10/01/2018 To: 09/30/2020

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY-2019	821	Kind For Congress Committee Smith, Brent	\$5,800.00	03/13/2019	\$5,800.00	03/13/2019	\$0.00	Attend FEC seminar	02/11/2020	11/20/2019
	852	American Principles Laor, Eytan	\$5,000.00	12/19/2018	\$5,000.00	11/20/2018	\$0.00	Attend FEC seminar File amended reports	11/19/2019 01/18/2019	10/02/2019 01/22/2019
	858	Wolfson, Howard Independence USA PAC	\$4,000.00	03/09/2019	\$4,000.00	02/26/2019	\$0.00	None		
	865	Rights & Democracy Action Stockinger, Peri	\$1,250.00	11/03/2018	\$1,250.00	10/15/2018	\$0.00	Committee will file for termination	12/03/2018	10/12/2018
	871	Equality Pennsylvania Dungee, Joseph	\$5,900.00	10/18/2020				Attend FEC seminar	10/18/2019	
	872	Kilgore, Paul McSally for Congress	\$23,400.00	08/01/2019	\$23,400.00	07/31/2019	\$0.00	None		
	873	Urban Victory Fund (UVF) Kinchin, Drue	\$750.00	11/17/2018	\$750.00	11/01/2018	\$0.00	Attend FEC seminar File amended reports	10/18/2019 11/17/2018	 09/13/2018
	874	Hornaday, Alexander Restore American Freedom and Liberty	\$2,650.00	12/26/2018				Conduct & certify internal audit/reconciliation	11/26/2019	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	877	Arizona Republican Party Lettieri, Bob	\$45,000.00	11/13/2019	\$45,000.00	01/06/2020	\$0.00	File amended reports Meet with RAD staff	05/12/2019 05/12/2019	04/30/2019 04/17/2019
	878	Crate, Bradley T. Perdue for Senate	\$30,000.00	03/11/2019	\$30,000.00	03/08/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/22/2019 05/13/2019
	879	Michigan Democratic State Central Committee O'Brien, Sandy	\$7,750.00	03/11/2019	\$7,750.00	03/12/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/24/2019 05/14/2019
	880	Massachusetts Democratic State Committee Yorkis, Paul G.	\$7,050.00	03/11/2019	\$7,050.00	04/01/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/24/2019 05/10/2019
	881	Democratic Party of South Carolina George, Velva E.	\$9,000.00	08/12/2019	\$9,000.00	05/31/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/26/2019 05/10/2019
	882	Democratic Party of Arkansas Vandiver, Dawne	\$7,900.00	05/13/2019	\$7,900.00	02/05/2019	\$0.00	Attend FEC seminar	05/13/2019	04/22/2019
	886	Kelly for Congress (MS) Page, Fred H.	\$1,900.00	04/06/2019	\$1,900.00	03/25/2019	\$0.00	Attend FEC seminar	03/07/2020	10/29/2019
	887	Giarraputo, Holly Brian Higgins for Congress	\$3,100.00	04/13/2019	\$3,100.00	03/22/2019	\$0.00	Conduct internal education program for employees or staff	06/13/2019	06/11/2019
	888	Marijuana Policy Project PAC Murphy, Don	\$4,000.00	04/13/2019	\$4,000.00	04/09/2019	\$0.00	Committee will file for termination	05/13/2019	04/30/2019

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	891	Scholten4Iowa Campaign Committee Hubay, Scott	\$750.00	06/08/2019	\$750.00	05/30/2019	\$0.00	Attend FEC seminar	05/09/2020	06/26/2019
	892	The Congressman Joe Barton Committee Barton, Kristin	\$3,680.00	06/08/2019	\$3,680.00	05/30/2019	\$0.00	Committee will file for termination	07/08/2019	06/10/2019
	893	Neel, Sam C. SEAL PAC Supporting Electing American Leaders PAC	\$10,000.00	06/08/2019	\$10,000.00	06/25/2019	\$0.00	Attend FEC seminar	05/09/2020	05/13/2020
	894	American Future Fund	\$15,600.00	07/05/2019	\$15,600.00	06/19/2019	\$0.00	Other	09/03/2019	08/29/2019
	896	Americas PAC Donelson, Tom	\$1,500.00	06/08/2019	\$1,500.00	04/22/2019	\$0.00	Attend FEC seminar	05/09/2020	04/22/2020
	897	Marsha for Senate Gant, Ron	\$7,500.00	08/17/2019	\$7,500.00	07/24/2019	\$0.00	Attend FEC seminar	07/18/2020	10/02/2019
	898	Maryott for Congress Maryott, Brian	\$5,500.00	08/14/2019	\$5,500.00	08/22/2019	\$0.00	Attend FEC seminar Conduct & certify internal audit/reconciliation	07/15/2020 07/15/2020	
	901	Pullen, Randall Lee Principles First, Inc.	\$4,900.00	08/14/2019	\$4,900.00	08/26/2019	\$0.00	Committee will file for termination	10/13/2019	10/04/2019
	904	Legislative Majority PAC Collinson, Eleanor	\$9,500.00	09/30/2019	\$9,500.00	10/31/2019	\$0.00	Attend FEC seminar Conduct & certify internal audit/reconciliation	08/20/2020 08/20/2020 08/20/2021	
	905	Pullins, Scott Ohio Majority Trust	\$1,750.00	02/19/2020	\$1,750.00	12/13/2019	\$0.00	Attend FEC seminar	08/19/2020	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	906	Americans for the Cure of Breast Cancer Piaro, Robert	\$9,000.00	09/26/2019	\$9,000.00	10/29/2019	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	08/26/2020 10/26/2019	 10/25/2019
	907	Tennessee Democratic Party McMillan, Geeta	\$2,100.00	09/20/2019	\$2,100.00	01/10/2020	\$0.00	Attend FEC seminar File amended reports	08/20/2020 09/20/2019	 09/17/2019
	908	Tony Cardenas for Congress May, Jennifer	\$5,575.00	09/26/2019	\$5,575.00	09/27/2019	\$0.00	Conduct internal education program for employees or staff	11/19/2019	11/19/2019
	909	Win Justice Pateriya, Deepak	\$2,450.00	09/15/2019	\$2,450.00	09/17/2019	\$0.00	Develop a FEC Compliance Manual	08/15/2020	
	910	National Rifle Association (NRA) Institute for Legislative Action Owens, Robert G.	\$4,500.00	09/28/2019	\$4,500.00	09/10/2019	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	08/29/2020 11/27/2019	03/27/2019 03/18/2020
	913	Mississippi Democratic Party Brown, Ryan	\$9,000.00	09/30/2019	\$9,000.00	11/05/2019	\$0.00	Attend FEC seminar	08/31/2020	
	915	Massachusetts Democratic State Committee Yorkis, Paul G.	\$8,000.00	09/30/2019	\$8,000.00	10/22/2019	\$0.00	Develop a FEC Compliance Manual	10/29/2019	10/15/2019
Sub-Total : FY -2019			\$265,755.00		\$257,205.00		\$0.00			
FY -2020	912	North Dakota Republican Party Hacker, Nicholas P.	\$8,000.00	07/25/2020				Develop a FEC Compliance Manual	08/24/2020	
	914	Idaho State Democratic Party Hayes, LeRoy	\$4,525.00	07/31/2020	\$4,525.00	07/27/2020	\$0.00	Attend FEC seminar	07/01/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	916	Allen, Levi United Mine Workers of America Power PAC	\$9,000.00	07/31/2020				Develop a FEC Compliance Manual	08/31/2020	
	917	Ruppert, Jeffrey A. Elevate Ohio	\$1,955.00	07/31/2020	\$1,955.00	07/17/2020	\$0.00	Attend FEC seminar	07/01/2021	
	918	Engineers Political Education Committee (EPEC)/International Union of Operating Engineers Hickey, Brian E.	\$8,175.00	07/31/2020	\$8,175.00	07/30/2020	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	07/01/2021 09/29/2020	
	919	Mackey, Tim LIUNA Minnesota & North Dakota/Laborers' District Council of Minnesota & North Dakota	\$9,950.00	07/29/2020				Develop a FEC Compliance Manual	06/29/2021	
	921	Scalise for Congress Ottenhoff, Benjamin	\$2,300.00	07/31/2020	\$2,300.00	07/24/2020	\$0.00	Attend FEC seminar	07/01/2021	
	922	Hudson, Gerald United We Can	\$12,100.00	07/31/2020				Conduct internal education program for employees or staff	09/29/2020	
	923	Oklahoma Democratic Party Hunsucker, Rachael	\$19,450.00	08/14/2020				Attend FEC seminar Develop RFAI tracking & response procedures	01/15/2021 08/14/2020	
	924	Kallabat, Zinnia Working Michigan (SuperPac)	\$4,500.00	08/14/2020				Attend FEC seminar Develop a FEC Compliance Manual	07/15/2021 10/13/2020	
	925	Massachusetts Republican Party Andersen, Brent	\$5,450.00	08/02/2020				Attend FEC seminar	07/03/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	926	Campos Hernandez, Oriol Todos con Jennifer Inc. DBA Jennifer for Congress	\$5,900.00	07/31/2020	\$5,900.00	07/22/2020	\$0.00	Attend FEC seminar	07/21/2021	
	927	Michigan Republican Party (Registered Cmte) Meyers, Carl	\$37,500.00	07/31/2020	\$37,500.00	07/23/2020	\$0.00	Attend FEC seminar	07/01/2021	
	928	Deaglan McEachern for Congress Tiernan, Lori	\$3,450.00	08/05/2020				Committee will file for termination	10/04/2020	
	929	Lux, Michael Fair and Balanced PAC	\$2,300.00	07/31/2020				Attend FEC seminar	07/01/2021	
	930	Ramirez, Ronald Conservative Triumph Fund	\$2,150.00	07/31/2020	\$2,150.00	12/17/2019	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	07/01/2021 09/29/2020	06/24/2020
	931	Patients for Affordable Drugs Action Wakana, Benjamin L.	\$6,950.00	07/31/2020	\$6,950.00	07/24/2020	\$0.00	Attend FEC seminar	07/01/2021	
	932	Stoltz, Gail For Our Future	\$2,475.00	07/31/2020				Attend FEC seminar	07/01/2021	
	933	New Jersey Republican State Committee Bengivenga, April	\$5,030.00	07/31/2020				Attend FEC seminar Develop RFAI tracking & response procedures	07/01/2021 07/31/2020	
	934	Oklahoma Democratic Party Hunsucker, Rachael	\$0.00	07/15/2020				Not Applicable	07/15/2020	
	936	Svoboda, Brian G. Morris, Cindy	\$2,900.00	07/31/2020	\$2,900.00	07/23/2020	\$0.00	Attend FEC seminar	07/01/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	937	Planned Parenthood Votes Barrow-Klein, Vickie	\$4,000.00	07/31/2020	\$4,000.00	07/27/2020	\$0.00	Conduct internal education program for employees or staff	07/01/2021	
	938	Massachusetts Democratic State Committee Yorkis, Paul G.	\$5,550.00	07/31/2020				Attend FEC seminar Develop RFAI tracking & response procedures	07/01/2021	
	939	Kahn, Michael Association For Firefighters PAC DBA Association for Firefighters	\$3,850.00	07/31/2020				Attend FEC seminar Develop RFAI tracking & response procedures	07/01/2021 07/31/2020	
	940	Terry, David Texans for Texas	\$3,175.00	08/02/2020	\$3,175.00	07/24/2020	\$0.00	Committee will file for termination	10/01/2020	
	942	Fight for Tomorrow Mackowiak, Matt L.	\$2,250.00	11/28/2020				Attend FEC seminar Develop a FEC Compliance Manual	07/01/2021 09/29/2020	
	944	One Nation United Crevecœur-Macphail, Desiree	\$21,675.00	07/21/2021				Attend FEC seminar Conduct & certify internal audit/reconciliation Develop a FEC Compliance Manual	07/21/2021 07/21/2021 07/21/2022 10/21/2020	
	946	Utah State Democratic Committee Srivastava, Sheila	\$5,310.00	07/31/2020	\$5,310.00	06/29/2020	\$0.00	Attend FEC seminar Develop RFAI tracking & response procedures	07/01/2021 07/31/2020	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	948	Human Rights Campaign Equality Votes Rinefierd, James M.	\$2,350.00	07/31/2020				Attend FEC seminar Develop a FEC Compliance Manual	07/01/2021 09/29/2020	
	950	Arizona Republican Party Lettieri, Bob	\$3,900.00	07/31/2020				Adopt and distribute policy regarding contributions to federal elections	07/31/2020	
	952	CASA in Action PAC Guzman, Melissa	\$13,500.00	07/31/2020				Attend FEC seminar Conduct & certify internal audit/reconciliation Develop a FEC Compliance Manual	07/01/2021 07/31/2020 09/29/2020	
	953	Hotel Workers for Stronger Communities	\$2,900.00	07/31/2020				Attend FEC seminar Other	07/01/2021 07/31/2020	
	954	Kutac, Paul Americans for Police and Trooper Safety	\$3,000.00	07/31/2020				Attend FEC seminar Develop a FEC Compliance Manual	07/01/2021 09/29/2020	
	956	Zucker, Jonathan It Starts Today	\$5,450.00	07/31/2020				Attend FEC seminar Conduct & certify internal audit/reconciliation Develop a FEC Compliance Manual	07/01/2021 07/01/2021 09/29/2020	
Sub-Total : FY -2020			\$230,970.00		\$84,840.00		\$0.00			
Grand Total :			\$496,725.00		\$342,045.00		\$0.00			



AF Performance Goals

Print Date: July 31, 2020

Selected Parameters:

Office: Both

Start Date: 10/01/2019

End Date: 06/30/2020

*Exception: YES



AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
Processed						
2019	YE	H_S_P_UNAUTH	N	01/31/2020	03/26/2020	
2019	M12	P_UNAUTH	N	12/20/2019	02/12/2020	
2019	M11	P_UNAUTH	N	11/20/2019	01/13/2020	
2019	M10	P_UNAUTH	N	10/20/2019	12/04/2019	
2019	Q3	H_S_P	N	10/15/2019	12/04/2019	
2019	M9	P_UNAUTH	N	09/20/2019	11/18/2019	
2019	M8	P_UNAUTH	N	08/20/2019	10/08/2019	
2020	12P	AUTH	Y	05/21/2020	06/30/2020	
2020	M5	P_UNAUTH	N	05/20/2020	06/29/2020	
2020	12P	AUTH	Y	04/30/2020	06/16/2020	
2020	M4	P_UNAUTH	N	04/20/2020	06/12/2020	
2020	12P	AUTH	Y	04/16/2020	06/12/2020	
2020	Q1	H_S_P_UNAUTH	N	04/15/2020	06/10/2020	
2020	M3	P_UNAUTH	N	03/20/2020	04/30/2020	
2020	12P	AUTH	Y	03/05/2020	04/27/2020	
2020	12P	AUTH	Y	02/20/2020	04/13/2020	
2020	M2	P_UNAUTH	N	02/20/2020	04/06/2020	

Total AF Reports Processed 17

Average Processing Days 50.12

(b) (7)(E)

Percentage to Goal 100.00%

Processed - No committees

					Action Date	(b) (7)(E)
2019	M10	P_UNAUTH	Y	10/20/2019	12/05/2019	
2019	Q3	H_S_P	Y	10/15/2019	12/05/2019	
2019	30SG	AUTH	N	10/10/2019	11/18/2019	
2019	12SG	AUTH	Y	08/29/2019	10/28/2019	
2020	12C	AUTH	Y	05/18/2020	06/29/2020	
2020	12PR	AUTH	Y	05/14/2020	06/18/2020	



AF Performance Goals

(Confidential and Sensitive)

Processed - No committees

Action Date

(b) (7)(E)

2020	12P	AUTH	Y	05/07/2020	06/18/2020
2020	12C	AUTH	Y	05/02/2020	06/18/2020
2020	12C	AUTH	Y	05/01/2020	06/18/2020
2020	12C	AUTH	Y	04/30/2020	06/16/2020
2020	12PR	AUTH	Y	04/30/2020	06/18/2020
2020	12SG	AUTH	Y	04/30/2020	06/18/2020
2020	12SGR	AUTH	Y	04/30/2020	06/18/2020
2020	12C	AUTH	Y	04/29/2020	06/16/2020
2020	12C	AUTH	Y	04/25/2020	06/16/2020
2020	12P	AUTH	Y	04/23/2020	06/15/2020
2020	12C	AUTH	Y	04/20/2020	06/15/2020
2020	12SG	AUTH	Y	04/16/2020	06/15/2020
2020	12C	AUTH	Y	04/13/2020	05/18/2020
2020	12C	AUTH	Y	04/06/2020	05/18/2020
2020	30SG	AUTH	N	04/02/2020	05/04/2020
2020	12C	AUTH	Y	03/23/2020	04/30/2020
2020	12PR	AUTH	Y	03/19/2020	04/28/2020
2020	12C	AUTH	Y	03/09/2020	04/28/2020
2020	12C	AUTH	Y	03/02/2020	04/27/2020
2020	12P	AUTH	Y	02/27/2020	04/14/2020
2020	12C	AUTH	Y	02/24/2020	04/14/2020
2020	12SG	AUTH	Y	02/20/2020	04/07/2020
2020	12SP	AUTH	Y	02/06/2020	03/30/2020
2020	12SP	AUTH	Y	01/23/2020	03/23/2020

Total AF Reports Processed-No Committees

30

Average Processing Days

47.43

(b) (7)(E)

Percentage to Goal

100.00%



AF Performance Goals

(Confidential and Sensitive)

Total AF Reports 47

Average Processing Days 48.40

(b) (7)(E)

Percentage to Goal 100.00%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters
RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2018	48H	3730	C00665554	09/30/2019	11/21/2019	52	Y
2018	48H	3738	C00675215	10/21/2019	12/12/2019	52	Y

Total Challenges Processed 2

Average Processing Days 52.00

Total Reports Processed within 60 Days 2

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

Administrative Fine Program Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$131,164	\$343,987	\$531,552

(b) (7)(E)

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AGENDA DOCUMENT NO. X20-49

AGENDA ITEM

For meeting of November 10, 2020

October 30, 2020

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista Roche *KJR*
Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Dayna C. Brown *DCB*
Acting Assistant Staff Director
Audit Division

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2020 Overview and 4th Quarter Highlights
(7/1/20 – 9/30/20)

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of Fiscal Year 2020 and fourth quarter accomplishments and highlights FY 2020 (7/1/20 – 9/30/20). The intent of this document is to provide an update of the workload and achieved results of the Office of Compliance on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during an upcoming Executive Session.

The attached **Appendix A** provides the Commission with fourth quarter highlights for each office and a statistical overview of FY 2020 results and progression towards meeting the goals outlined within the 2018-2022 Strategic Plan adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled ‘Proposed Final Audit Report – Due Date’ which highlights the report manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2020 statistics for meeting strategic performance goals related to the Administrative Fine Program. **Appendix F** (AF Penalties Assessed and Collected) shows the total amount of penalties assessed and collection rate for FY 2015 – 2020.

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the document.

Alternative Dispute Resolution Office (ADRO)

In the fourth quarter of FY 2020, the ADRO received 8 cases. Of these, the Reports Analysis Division (RAD) referred 6 matters, the Office of General Counsel (OGC) transferred 1 matter, and the Commission voted to offer 1 Committee the opportunity to terminate its audit and participate in ADR. During this time period, the ADRO closed 37 matters. The Commission assessed \$223,395 in civil penalties.

During the fourth quarter, the ADRO circulated recommendations in 6 matters. (b) (7)(E)

There are currently 18 matters pending with the Commission for a vote.

In the fourth quarter of FY 2020, the ADRO focused on closing a record number of cases upon the restoration of a quorum. In addition, ADRO staff continued to work with OCIO to implement enhancements to its case management software, Law Manager, in order to increase office efficiency.

Administrative Fine Program (Office of Administrative Review)

During the fourth quarter of FY 2020, RAD processed 10 Reason to Believe (RTB) memoranda. (b) (7)(E)

OAR processed Reviewing Officer Recommendations (RORs) for 5 cases during the fourth quarter. OAR forwarded 100% of these RORs within 60 days, thus exceeding the strategic goal of processing 75% of RORs within 60 days of the challenge receipt date. There are currently 29 Administrative Fine Program memoranda pending with the Commission.

In the fourth quarter, OAR received 19 new challenges in response to the high volume of RTB findings approved at the end of the third quarter. OAR processed RORs in 6 of these cases,

and the remaining 13 cases will be processed in first quarter of FY 2020. OAR also processed \$116,146 in Administrative Fine payments and continued to assist with financial reporting for all civil money penalties assessed by the Commission.

Audit Division (Audit)

For the 2018 cycle, Audit staff conducted 16 audits which had a total of 584,411 receipt transactions totaling \$53,503,967 and 17,950 disbursement transactions totaling \$52,695,757.

During the fourth quarter of FY 2020, the Audit Division (Audit) processed the following audit reports:

	Audit Report Stage	Number of Reports
Released to Public	Final Audit Report	0
Sent to the Committee	Interim Audit Report	2
	Draft Final Audit Report	0
Circulated to the Commission	Interim Audit Report (<i>informational and no-objection basis</i>)	3
	Audit Division Recommendation Memorandum	1
	Proposed Final Audit Report	0
Forwarded to OGC	Interim Audit Report	3
	Draft Final Audit Report	2
	Audit Division Recommendation Memorandum	1
	Total # of Audit Reports	12

Audit has a total of 17 open audits. Four of these audits are authorized committees and 13 audits are unauthorized committees.

There is one 2016 cycle audit that remains open and is awaiting Commission approval of the Audit Division Recommendation Memorandum.

For the 2018 cycle, there are 4 ongoing authorized committee audits. One Interim Audit Report and one Audit Division Recommendation Memorandum is pending before the Commission due to the lack of quorum and 1 audit is with the Office of General Counsel's Compliance Advice Team (OGC-CAT) for legal analysis of the Draft Final Audit Report. The remaining audit continues to be on hold given that Audit has not received the records necessary to commence fieldwork. (b) (5), (b) (7)(A)

The

Audit Division most recently circulated an informational update to the Commission on September 16, 2020 and will provide another update in December.

The remaining 12 open audits are for unauthorized committees. Fieldwork has concluded in 10 of the audits, with exit conferences scheduled to take place in November for the remaining 2. Of the 10 audits in the post-fieldwork stage, 6 are in the Interim Audit Report writing stage, 1 is with OGC-CAT for legal analysis of the Interim Audit Report, 2 are awaiting the committee's response to the Draft Final Audit Report and 1 Proposed Final Audit Report is pending before the Commission.

(b) (7) (E)

With respect to the Presidential Election Campaign Fund (PECF), Audit forwarded three 508 accessibility compliant monthly PECF reports received from the U.S. Treasury, to the Office of Chief Information Officer (OCIO) for web placement. In addition, Audit has begun preparing the budget estimate calculations for the next ten fiscal years, 2021 – 2031.

(b) (5)

Audit provided assistance to OGC Enforcement in one matter and in two matters for ADRO, and is currently working with OCIO to set up user acceptance testing (UAT) with Windows 10 and Office 2016 for the Download Application, Audit Sampling Program, Audit Status Database, and Contribute Program since audit webpages are currently on the transition webpage in preparation for receiving new laptops. TeamMate Champions attended the 2020 TeamMate User Forum (virtually). TeamMate Champions also continued to conduct market research on various replacement electronic workpaper systems, given that the current system is slated for a 2023 end-of-life. Following a fourth quarter meeting with OCFO's Budget Office, the procurement process for the new software will begin, in earnest, in early 2021. Audit provided systems information regarding storage of different applications used by Audit staff to Amazon and OCIO for possible transition to the cloud.

With regard to training, Audit Managers attended Prohibited Personnel Practices training with the Office of Special Counsel and Building High Performance Teams training via American University. Additionally, Audit held internal training on How to Reference Audit Reports and all Audit staff received 508 Compliance training in an effort to assist the agency with complying with federal law requiring that all content posted in a pdf format on the agency's website be accessible to those with disabilities who use assistive technology to read the website. The Audit staff is now working to ensure that all Audit reports and documents placed on the FEC's website are 508 compliant.

During the fourth quarter, Audit warmly welcomed a new Auditor and a new Audit Manager. The two completed RAD Party/Non-Party campaign guide training in September and continue to complete the in-depth Audit training program. We anticipate hiring our remaining two Auditors in the next couple of months, as Audit Managers are currently reviewing applications for the posting that closed in September.

Reports Analysis Division (RAD)

During the fourth quarter of FY 2020, RAD Reports Processing Branch staff continued to volunteer to report to the building weekly in order to scan and process paper reports as part of the Phase 1 reopening of agency operations. In addition, RAD staff continued to collaborate with OCIO on the NextGen efilings program conducting user acceptance testing on Forms 24, 1M and 3L, as well as two factor authentication, role-based access, and uploading/amending reports. Also during the fourth quarter, RAD staff assisted the Press Office with the vetting of the 18-month statistical summary and provided review and comment for the October Quarterly reporting reminder. RAD management also began the process of making proposed recommendations for the 2021-2022 RAD Review and Referral Procedures. We anticipate circulating a proposed recommendations draft to the Commission for review in November.



During the fourth quarter RAD staff reviewed a total of 28,981 documents totaling 23,694,148 pages and 92.5% of the reports were reviewed within 90 days of receipt, thus exceeding the strategic goal of 75% of reports reviewed within 90 days of receipt. RAD generated and sent 2,964 letters to the filing community and 87% of RFAs were sent within 40 days of the report review date. Also during the fourth quarter, RAD generated 7 referrals (1 OGC, 6 ADRO) and sent 1,341 non-filer notices where the Commission approved recommendations to publish 22 authorized committees for failure to timely file an election-sensitive report. In addition, RAD staff handled 3,803 phone calls and 205 emails. The Reports Processing Branch coded 63,983,177 transactions, 4,873 documents and processed 18,028 pages from 1,771 documents in the Paper Conversion system. Finally, RAD met or exceeded all of its performance goals for FY20.

RAD continued its commitment to training and outreach during the fourth quarter. RAD staff conducted Party/PAC Campaign Guide training for new Audit Division staff and collaborated with the Information Division on 4 reporting & FECfile webinars for Candidate Committees, PACs and Party Committees, and 2 Pre-Election Communications webinars. In addition, RAD staff attended the FEC Diversity Council Briefing and attended a virtual division training session on Unconscious Bias and Inclusion. In the area of assistance, RAD assisted OGC with 29 matters, ADRO with 3 matters, the Audit Division with 9 matters, the Information Division with 2 matters, Congressional Affairs with 1 matter, the Press Office with 3 matters, and responded to 16 inquiries from Commission offices.

In the area of personnel during fourth quarter, a Campaign Finance Analyst (CFA) retired and Assistant Branch Chief (Party/NonParty Branch) and Supervisory Training and Program Manager positions were filled. Upon receiving approval to fill CFA and Coding Clerk positions, interviews were conducted, and selections made with 3 new employees expected to join the RAD team in November. In addition, we are in the process of filling a Data Disclosure Assistant position and are awaiting Commission approval to backfill a Coding Clerk, Authorized Branch Assistant Branch Chief, and two Senior Campaign Finance and Reviewing Analyst (GS-12) positions. Finally, all RAD Managers received performance assessments for the 2019-2020 performance period and completed 2020-2021 performance management plans.

Attachments

Appendix A, FY 2020 Highlights and FY Overview for Office of Compliance Goals
Appendix B, Open Audits Report
Appendix C, Proposed Final Audit Report – Due Date
Appendix D, ADR Civil Penalty Report
Appendix E, AF Performance Goals Report
Appendix F, AF Penalties Assessed and Collected



Status of Compliance

FY 2020
(10/1/2019 – 9/30/2020)

Matters Awaiting a Commission Vote as of 10/30/20

Audit	Admin Fine Program/OAR	ADRO	Total
4	23/6	18	51

Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20 (9/30/20)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%	94.1%	98.5%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	99.0%	99.9%	99.8%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%	100%

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2020 Performance Goals	Status 9/30/20
RAD staff provided extended phone coverage from 5:30pm to 8:00pm for the 2020 July Quarterly, reporting deadline.	The RAD mainline received and directed 55 calls between 5:30pm and 8:00pm on the July 15th deadline.
RAD staff collaborated with the Information Division on four (4) reporting & FECfile webinars for Candidate Committees, PACs and Party Committees, and two (2) Pre-Election Communications webinars.	Candidate, Party/PAC reporting, Pre-Election Communications and FECfile webinars were held in September 2020.
RAD Assistant Staff Director provided a Best Practices for FEC Compliance session for the PLI - Corporate Political Activities 2020 Program.	The webinar was held in September 2020.

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 2: Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20
RAD to review 75% of reports within 90 days of receipt	79.3%	92.9%	76.6%	92.2%	76%	91.9%
RAD to send 75% of RFAs within 40 days of report review	92%	92%	88%	88%	85%	86%
(b) (7)(E)	93.5%	100%	96.2%	96.9%	88%	100%
	43%	56%	25%	45%	100%	N/A ¹
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	97%	81.8%	96.67%	100%	97%	100%
(b) (7)(E)	100%	100%	100%	99%	100%	100%

1 - No PFARs were circulated this quarter due to lack of quorum

Strategic Objective 4: Foster a Culture of High Performance

Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20 (9/30/20)
RAD	Documents/ Transactions Coded	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828	4,873/ 63,983,177
	Documents/Pages Processed in Paper Automation/ Conversion System	N/A	N/A	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417	1,771/ 18,028
	Documents/Pages Reviewed	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699	89,525/ 73,526,421
	Letters sent	13,433	13,253	14,796	13,763	12,562	13,838
	Telephone calls handled	11,822	12,362	11,634	13,036	13,149	13,209
	Email inquiries handled	N/A	N/A	N/A	396	658	894
	Referrals	91	43	95	46	82	34
	AF Cases RTB/FD	191/159	83/33	163/168	95/23	262/93	100/204
Audit	(b) (7)(E)						
ADRO							
OAR	Cases Received	35	12	29	8	37	20
	Cases Closed (FD)	32	11	32	10	36	2



Open Audits

As of 10/30/2020
(Confidential and Sensitive)

<u>Date of Last Action</u>	<u>Audit Manager</u>	<u>Report Track</u>
--------------------------------	--------------------------	-------------------------

Fieldwork

(b) (3) (A)
(b) (3) (A)

Total - 3

Interim/Preliminary Report Writing

2018 THE UTE PAC	C00626671	09/14/2020	Morcomb	B
2018 REPUBLICAN PARTY OF MINNESOTA - FEDERAL	C00001313	09/18/2020	Morcomb	B
(b) (3) (A)				
2018 CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE	C00167320	10/07/2020	Pacious	B

Total - 6

Draft Final Audit Report Writing

2018 DR. RAUL RUIZ FOR CONGRESS	C00502575	10/19/2020	Smith	B
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Total - 1

Draft Final Audit Report Committee Response Period

2018 GRASSROOTS VICTORY PAC	C00608380	10/14/2020	Burgess	B
2018 NATIONAL TOOLING & MACHINING ASSOCIATION (NTMA) COMMITTEE FOR A STRONG ECONOMY	C00043091	10/22/2020	Lee	B

Total - 2

Audits in OGC

2018 DEMOCRACY ENGINE, INC., PAC	C00468314	IAR	09/15/2020	Burgess	B
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Total - 1

Audits with the Commission

2016 MISSISSIPPI REPUBLICAN PARTY	C00084368	ADRM	06/05/2020	Pacious	B
2018 VAN DREW FOR CONGRESS	C00661868	ADRM	08/07/2020	Burgess	B
2018 MIKE BRAUN FOR INDIANA	C00653147	IAR	09/17/2020	Morcomb	B
2018 DEMOCRATIC FOUNDATION OF ORANGE COUNTY	C00176420	PFAR	10/01/2020	Smith	C

Total - 4



Open Audits

As of 10/30/2020
(Confidential and Sensitive)

17 Open Audits

Legend

Track B	Audits with findings
Track C	Audits with <u>no</u> findings
IAR	Interim Audit Report
PAR	Preliminary Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report
Text	If text is red, the report has not been sent to OGC for a legal analysis



Open Audits

As of 10/30/2020
(Confidential and Sensitive)

Audit Caseload

<u>Audit Manager</u>	<u>Number of Audits</u>	<u>Percent of Total Audits</u> ¹
Burgess	4	24%
Lee	1	6%
Morcomb	3	18%
Pacious	4	24%
Smith	5	29%
Totals	17	100%

¹ May not total 100% due to rounding



Open Audits

As of 10/30/2020

(Confidential and Sensitive)

Comments

2016

Mississippi Republican Party
(b) (5)

2018

(b) (3) (A)
(b) (5)

(b) (5)

Connecticut Democratic State Central Committee
(b) (5)

Democracy Engine PAC
(b) (5)

Democratic Foundation of Orange County
(b) (5)

(b) (3) (A)
(b) (5)

Dr. Raul Ruiz for Congress
(b) (5)

Grassroots Victory PAC
(b) (5)

(b) (3) (A)
(b) (5)

Mike Braun for Indiana
(b) (5)

National Tooling & Machining Association Committee for a Strong Economy
(b) (5)

Republican Party of Minnesota - Federal
(b) (5)

(b) (3) (A)
(b) (5)

The UTE PAC
(b) (5)

(b) (3) (A)
(b) (5)

Van Drew for Congress
(b) (5)



Proposed Final Audit Report - Due Date

As of 10/30/2020

(Confidential and Sensitive)

	<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2016 MISSISSIPPI REPUBLICAN PARTY	Pacious	ADRM	Circulated to Commission	01/26/2018
2018 DR. RAUL RUIZ FOR CONGRESS	Smith	DFAR	Report Writing	04/25/2019
2018 VAN DREW FOR CONGRESS	Burgess	ADRM	Circulated to Commission	04/25/2019
2018 MIKE BRAUN FOR INDIANA	Lmorcomb	IAR	Circulated to Commission	04/25/2019
2018 DEMOCRACY ENGINE, INC., PAC	Burgess	IAR	OGC Reviewing	10/02/2019
2018 NATIONAL TOOLING & MACHINING ASSOCIATION (NTMA) COMMITTEE FOR A STRONG ECONOMY	Lee	DFAR	Committee Response Period	10/02/2019

(b) (7)(E)

(b) (3) (A)

2018 DEMOCRATIC FOUNDATION OF ORANGE COUNTY	Smith	PFAR	Circulated to Commission	10/02/2019
2018 REPUBLICAN PARTY OF MINNESOTA - FEDERAL	Lmorcomb	IAR	Report Writing	10/02/2019
2018 CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE	Pacious	IAR	Report Writing	10/02/2019

(b) (3) (A)

2018 GRASSROOTS VICTORY PAC	Burgess	DFAR	Committee Response Period	10/02/2019
2018 THE UTE PAC	Lmorcomb	IAR	Report Writing	10/02/2019
2018 DEMOCRATIC PARTY OF ARKANSAS	Smith		Fieldwork	10/02/2019

(b) (3) (A)

(b) (3) (A)



Proposed Final Audit Report - Due Date

As of 10/30/2020

(Confidential and Sensitive)

17 Open Audits

Legend

- IAR Interim Audit Report
- PAR Preliminary Audit Report
- DFAR Draft Final Audit Report
- ADRM Audit Division Recommendation Memorandum
- PFAR Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year: 10/01/2018 To: 09/30/2020

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY-2019	821	Kind For Congress Committee Smith, Brent	\$5,800.00	03/13/2019	\$5,800.00	03/13/2019	\$0.00	Attend FEC seminar	02/11/2020	11/20/2019
	852	American Principles Laor, Eytan	\$5,000.00	12/19/2018	\$5,000.00	11/20/2018	\$0.00	Attend FEC seminar File amended reports	11/19/2019 01/18/2019	10/02/2019 01/22/2019
	858	Wolfson, Howard Independence USA PAC	\$4,000.00	03/09/2019	\$4,000.00	02/26/2019	\$0.00	None		
	865	Rights & Democracy Action Stockinger, Peri	\$1,250.00	11/03/2018	\$1,250.00	10/15/2018	\$0.00	Committee will file for termination	12/03/2018	10/12/2018
	871	Equality Pennsylvania Dungee, Joseph	\$5,900.00	10/18/2020				Attend FEC seminar	10/18/2019	
	872	Kilgore, Paul McSally for Congress	\$23,400.00	08/01/2019	\$23,400.00	07/31/2019	\$0.00	None		
	873	Urban Victory Fund (UVF) Kinchin, Drue	\$750.00	11/17/2018	\$750.00	11/01/2018	\$0.00	Attend FEC seminar File amended reports	10/18/2019 11/17/2018	 09/13/2018
	874	Hornaday, Alexander Restore American Freedom and Liberty	\$2,650.00	12/26/2018				Conduct & certify internal audit/reconciliation	11/26/2019	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	877	Arizona Republican Party Lettieri, Bob	\$45,000.00	11/13/2019	\$45,000.00	01/06/2020	\$0.00	File amended reports Meet with RAD staff	05/12/2019 05/12/2019	04/30/2019 04/17/2019
	878	Crate, Bradley T. Perdue for Senate	\$30,000.00	03/11/2019	\$30,000.00	03/08/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/22/2019 05/13/2019
	879	Michigan Democratic State Central Committee O'Brien, Sandy	\$7,750.00	03/11/2019	\$7,750.00	03/12/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/24/2019 05/14/2019
	880	Massachusetts Democratic State Committee Yorkis, Paul G.	\$7,050.00	03/11/2019	\$7,050.00	04/01/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/24/2019 05/10/2019
	881	Democratic Party of South Carolina George, Velva E.	\$9,000.00	08/12/2019	\$9,000.00	05/31/2019	\$0.00	Attend FEC seminar File amended reports	05/13/2019 05/13/2019	04/26/2019 05/10/2019
	882	Democratic Party of Arkansas Vandiver, Dawne	\$7,900.00	05/13/2019	\$7,900.00	02/05/2019	\$0.00	Attend FEC seminar	05/13/2019	04/22/2019
	886	Kelly for Congress (MS) Page, Fred H.	\$1,900.00	04/06/2019	\$1,900.00	03/25/2019	\$0.00	Attend FEC seminar	03/07/2020	10/29/2019
	887	Giarraputo, Holly Brian Higgins for Congress	\$3,100.00	04/13/2019	\$3,100.00	03/22/2019	\$0.00	Conduct internal education program for employees or staff	06/13/2019	06/11/2019
	888	Marijuana Policy Project PAC Murphy, Don	\$4,000.00	04/13/2019	\$4,000.00	04/09/2019	\$0.00	Committee will file for termination	05/13/2019	04/30/2019

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	891	Scholten4Iowa Campaign Committee Hubay, Scott M.	\$750.00	06/08/2019	\$750.00	05/30/2019	\$0.00	Attend FEC seminar	05/09/2020	06/26/2019
	892	The Congressman Joe Barton Committee Barton, Kristin	\$3,680.00	06/08/2019	\$3,680.00	05/30/2019	\$0.00	Committee will file for termination	07/08/2019	06/10/2019
	893	Neel, Sam C. SEAL PAC Supporting Electing American Leaders PAC	\$10,000.00	06/08/2019	\$10,000.00	06/25/2019	\$0.00	Attend FEC seminar	05/09/2020	05/13/2020
	894	American Future Fund	\$15,600.00	07/05/2019	\$15,600.00	06/19/2019	\$0.00	Other	09/03/2019	08/29/2019
	896	Americas PAC Donelson, Tom	\$1,500.00	06/08/2019	\$1,500.00	04/22/2019	\$0.00	Attend FEC seminar	05/09/2020	04/22/2020
	897	Marsha for Senate Gant, Ron	\$7,500.00	08/17/2019	\$7,500.00	07/24/2019	\$0.00	Attend FEC seminar	07/18/2020	10/02/2019
	898	Maryott for Congress Maryott, Brian	\$5,500.00	08/14/2019	\$5,500.00	08/22/2019	\$0.00	Attend FEC seminar Conduct & certify internal audit/reconciliation	07/15/2020 07/15/2020	
	901	Pullen, Randall Lee Principles First, Inc.	\$4,900.00	08/14/2019	\$4,900.00	08/26/2019	\$0.00	Committee will file for termination	10/13/2019	10/04/2019
	904	Legislative Majority PAC Collinson, Eleanor	\$9,500.00	09/30/2019	\$9,500.00	10/31/2019	\$0.00	Attend FEC seminar Conduct & certify internal audit/reconciliation	08/20/2020 08/20/2020 08/20/2021	12/04/2019 08/18/2020
	905	Pullins, Scott Ohio Majority Trust	\$1,750.00	02/19/2020	\$1,750.00	12/13/2019	\$0.00	Attend FEC seminar	08/19/2020	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	906	Americans for the Cure of Breast Cancer Piaro, Robert	\$9,000.00	09/26/2019	\$9,000.00	10/29/2019	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	08/26/2020 10/26/2019	 10/25/2019
	907	Tennessee Democratic Party McMillan, Geeta	\$2,100.00	09/20/2019	\$2,100.00	01/10/2020	\$0.00	Attend FEC seminar File amended reports	08/20/2020 09/20/2019	 09/17/2019
	908	Tony Cardenas for Congress May, Jennifer	\$5,575.00	09/26/2019	\$5,575.00	09/27/2019	\$0.00	Conduct internal education program for employees or staff	11/19/2019	11/19/2019
	909	Win Justice Pateriya, Deepak	\$2,450.00	09/15/2019	\$2,450.00	09/17/2019	\$0.00	Develop a FEC Compliance Manual	08/15/2020	
	910	National Rifle Association (NRA) Institute for Legislative Action Owens, Robert G.	\$4,500.00	09/28/2019	\$4,500.00	09/10/2019	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	08/29/2020 11/27/2019	03/27/2019 03/18/2020
	913	Mississippi Democratic Party Brown, Ryan	\$9,000.00	09/30/2019	\$9,000.00	11/05/2019	\$0.00	Attend FEC seminar	08/31/2020	
	915	Massachusetts Democratic State Committee Yorkis, Paul G.	\$8,000.00	09/30/2019	\$8,000.00	10/22/2019	\$0.00	Develop a FEC Compliance Manual	10/29/2019	10/15/2019
Sub-Total : FY -2019			\$265,755.00		\$257,205.00		\$0.00			
FY -2020	912	North Dakota Republican Party Hacker, Nicholas P.	\$8,000.00	07/25/2020	\$8,000.00	08/11/2020	\$0.00	Develop a FEC Compliance Manual	08/24/2020	08/24/2020
	914	Idaho State Democratic Party Hayes, LeRoy	\$4,525.00	07/31/2020	\$4,525.00	07/27/2020	\$0.00	Attend FEC seminar	07/01/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	916	Allen, Levi United Mine Workers of America Power PAC	\$9,000.00	07/31/2020	\$9,000.00	09/02/2020	\$0.00	Develop a FEC Compliance Manual	08/31/2020	09/17/2020
	917	Ruppert, Jeffrey A. Elevate Ohio	\$1,955.00	07/31/2020	\$1,955.00	07/17/2020	\$0.00	Attend FEC seminar	07/01/2021	09/01/2020
	918	Engineers Political Education Committee (EPEC)/International Union of Operating Engineers Hickey, Brian E.	\$8,175.00	07/31/2020	\$8,175.00	07/30/2020	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	07/01/2021 09/29/2020	
	919	Mackey, Tim LIUNA Minnesota & North Dakota/Laborers' District Council of Minnesota & North Dakota	\$9,950.00	07/29/2020	\$9,950.00	08/13/2020	\$0.00	Develop a FEC Compliance Manual	06/29/2021	
	921	Scalise for Congress Ottenhoff, Benjamin	\$2,300.00	07/31/2020	\$2,300.00	07/24/2020	\$0.00	Attend FEC seminar	07/01/2021	
	922	Hudson, Gerald United We Can	\$12,100.00	07/31/2020	\$12,100.00	08/13/2020	\$0.00	Conduct internal education program for employees or staff	09/29/2020	10/08/2020
	923	Oklahoma Democratic Party Hunsucker, Rachael	\$19,450.00	08/14/2020	\$19,450.00	08/11/2020	\$0.00	Attend FEC seminar Develop RFAI tracking & response procedures	01/15/2021 08/14/2020	 07/31/2020
	924	Kallabat, Zinnia Working Michigan (SuperPac)	\$4,500.00	08/14/2020	\$4,500.00	08/06/2020	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	07/15/2021 10/13/2020	09/02/2020 09/26/2020
	925	Massachusetts Republican Party Andersen, Brent	\$5,450.00	08/02/2020	\$5,450.00	10/05/2020	\$0.00	Attend FEC seminar	07/03/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	926	Campos Hernandez, Oriol Todos con Jennifer Inc. DBA Jennifer for Congress	\$5,900.00	07/31/2020	\$5,900.00	07/22/2020	\$0.00	Attend FEC seminar	07/21/2021	
	927	Michigan Republican Party (Registered Cmte) Meyers, Carl	\$37,500.00	07/31/2020	\$37,500.00	07/23/2020	\$0.00	Attend FEC seminar	07/01/2021	09/01/2020
	928	Deaglan McEachern for Congress Tiernan, Lori	\$3,450.00	08/05/2020	\$3,450.00	10/02/2020	\$0.00	Committee will file for termination	10/04/2020	
	929	Lux, Michael Fair and Balanced PAC	\$2,300.00	07/31/2020	\$2,300.00	08/03/2020	\$0.00	Attend FEC seminar	07/01/2021	
	930	Ramirez, Ronald Conservative Triumph Fund	\$2,150.00	07/31/2020	\$2,150.00	12/17/2019	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	07/01/2021 09/29/2020	06/24/2020
	931	Patients for Affordable Drugs Action Wakana, Benjamin L.	\$6,950.00	07/31/2020	\$6,950.00	07/24/2020	\$0.00	Attend FEC seminar	07/01/2021	
	932	Stoltz, Gail For Our Future	\$2,475.00	07/31/2020	\$2,475.00	08/03/2020	\$0.00	Attend FEC seminar	07/01/2021	
	933	New Jersey Republican State Committee Bengivenga, April	\$5,030.00	07/31/2020	\$5,030.00	09/02/2020	\$0.00	Attend FEC seminar Develop RFAI tracking & response procedures	01/01/2021 07/31/2020	07/31/2020
	934	Oklahoma Democratic Party Hunsucker, Rachael	\$0.00	07/15/2020				Not Applicable	07/15/2020	
	936	Svoboda, Brian G. Morris, Cindy	\$2,900.00	07/31/2020	\$2,900.00	07/31/2020	\$0.00	Attend FEC seminar	07/01/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	937	Planned Parenthood Votes Barrow-Klein, Vickie	\$4,000.00	07/31/2020	\$4,000.00	08/14/2020	\$0.00	Conduct internal education program for employees or staff	07/01/2021	
	938	Massachusetts Democratic State Committee Yorkis, Paul G.	\$5,550.00	07/31/2020	\$5,550.00	09/14/2020	\$0.00	Attend FEC seminar Develop RFAI tracking & response procedures	01/03/2021 07/31/2020	 07/31/2020
	939	Kahn, Michael Association For Firefighters PAC DBA Association for Firefighters	\$3,850.00	07/31/2020				Attend FEC seminar Develop RFAI tracking & response procedures	07/01/2021 07/31/2020	 07/31/2020
	940	Terry, David Texans for Texas	\$3,175.00	08/02/2020	\$3,175.00	07/24/2020	\$0.00	Committee will file for termination	10/01/2020	07/24/2020
	942	Fight for Tomorrow Mackowiak, Matt L.	\$2,250.00	11/28/2020	\$1,000.00	10/05/2020	\$1,250.00	Attend FEC seminar Develop a FEC Compliance Manual	07/01/2021 09/29/2020	
	944	One Nation United Crevecœur-Macphail, Desiree	\$21,675.00	07/21/2021				Attend FEC seminar Conduct & certify internal audit/reconciliation Develop a FEC Compliance Manual	07/21/2021 07/21/2021 07/21/2022 10/21/2020	
	946	Utah State Democratic Committee Srivastava, Sheila	\$5,310.00	07/31/2020	\$5,310.00	06/29/2020	\$0.00	Attend FEC seminar Develop RFAI tracking & response procedures	01/04/2021 07/31/2020	 07/31/2020

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	947	Build the Wave Lerner, Nathan	\$4,125.00	05/03/2021	\$1,000.00	09/21/2020	\$3,125.00	Attend FEC seminar Develop a FEC Compliance Manual	08/06/2021 11/04/2020	
	948	Human Rights Campaign Equality Votes Rinefierd, James M.	\$2,350.00	07/31/2020	\$2,350.00	08/19/2020	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	07/01/2021 09/29/2020	09/29/2020
	949	Bayer U.S. LLC Political Action Committee Branca, Brian	\$6,250.00	09/05/2020	\$6,250.00	08/24/2020	\$0.00	Attend FEC seminar Conduct internal education program for employees or staff Develop a FEC Compliance Manual	08/06/2021 11/04/2020 11/04/2020	10/06/2020 10/06/2020
	950	Arizona Republican Party Lettieri, Bob	\$3,900.00	07/31/2020	\$3,900.00	09/02/2020	\$0.00	Adopt and distribute policy regarding contributions to federal elections	07/31/2020	02/03/2020
	952	CASA in Action PAC Guzman, Melissa	\$13,500.00	07/31/2020	\$13,500.00	09/02/2020	\$0.00	Attend FEC seminar Conduct & certify internal audit/reconciliation Develop a FEC Compliance Manual	07/01/2021 07/31/2020 09/29/2020	
	953	Hotel Workers for Stronger Communities	\$2,900.00	07/31/2020	\$2,900.00	08/12/2020	\$0.00	Attend FEC seminar Other	07/01/2021 07/31/2020	08/28/2020
	954	Kutac, Paul Americans for Police and Trooper Safety	\$3,000.00	07/31/2020	\$3,000.00	08/20/2020	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	07/01/2021 09/29/2020	09/29/2020

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	956	Zucker, Jonathan It Starts Today	\$5,450.00	07/31/2020	\$5,450.00	08/03/2020	\$0.00	Attend FEC seminar	07/01/2021	
								Conduct & certify internal audit/reconciliation	07/01/2021	
								Develop a FEC Compliance Manual	09/29/2020	09/29/2020
Sub-Total : FY -2020			\$241,345.00		\$211,445.00		\$4,375.00			
Grand Total :			\$507,100.00		\$468,650.00		\$4,375.00			



AF Performance Goals

Print Date: October 30, 2020

Selected Parameters:

Office: Both

Start Date: 10/01/2019

End Date: 09/30/2020

*Exception: YES



AF Performance Goals

(Confidential and Sensitive)

RAD

Year Type Description Election Sensitive Due Date RTB Circ Date

Processed

2019	YE	H_S_P_UNAUTH	N	01/31/2020	03/26/2020
2019	M12	P_UNAUTH	N	12/20/2019	02/12/2020
2019	M11	P_UNAUTH	N	11/20/2019	01/13/2020
2019	M10	P_UNAUTH	N	10/20/2019	12/04/2019
2019	Q3	H_S_P	N	10/15/2019	12/04/2019
2019	M9	P_UNAUTH	N	09/20/2019	11/18/2019
2019	M8	P_UNAUTH	N	08/20/2019	10/08/2019
2020	12P	AUTH	Y	08/06/2020	09/30/2020
2020	12P	AUTH	Y	07/30/2020	09/22/2020
2020	12PR	AUTH	Y	07/30/2020	09/22/2020
2020	12P	AUTH	Y	07/23/2020	09/15/2020
2020	M7	P_UNAUTH	N	07/20/2020	09/15/2020
2020	Q2	H_S_P_UNAUTH	N	07/15/2020	09/10/2020
2020	M6	P_UNAUTH	N	06/20/2020	08/18/2020
2020	12P	AUTH	Y	06/18/2020	08/11/2020
2020	12P	AUTH	Y	06/11/2020	08/10/2020
2020	30SG	AUTH	N	06/11/2020	08/10/2020
2020	12P	AUTH	Y	05/21/2020	06/30/2020
2020	M5	P_UNAUTH	N	05/20/2020	06/29/2020
2020	12P	AUTH	Y	04/30/2020	06/16/2020
2020	M4	P_UNAUTH	N	04/20/2020	06/12/2020
2020	12P	AUTH	Y	04/16/2020	06/12/2020
2020	Q1	H_S_P_UNAUTH	N	04/15/2020	06/10/2020
2020	M3	P_UNAUTH	N	03/20/2020	04/30/2020
2020	12P	AUTH	Y	03/05/2020	04/27/2020
2020	12P	AUTH	Y	02/20/2020	04/13/2020
2020	M2	P_UNAUTH	N	02/20/2020	04/06/2020

(b) (7)(E)





AF Performance Goals

(Confidential and Sensitive)

Total AF Reports Processed 27

Average Processing Days 52.44

(b) (7)(E)

Percentage to Goal 100.00%

Processed - No committees

Action Date

(b) (7)(E)

2019	M10	P_UNAUTH	Y	10/20/2019	12/05/2019
2019	Q3	H_S_P	Y	10/15/2019	12/05/2019
2019	30SG	AUTH	N	10/10/2019	11/18/2019
2019	12SG	AUTH	Y	08/29/2019	10/28/2019
2020	12P	AUTH	Y	08/17/2020	09/30/2020
2020	12PR	AUTH	Y	08/13/2020	09/30/2020
2020	12P	AUTH	Y	07/28/2020	09/22/2020
2020	12C	AUTH	Y	07/27/2020	09/22/2020
2020	12P	AUTH	Y	07/27/2020	09/22/2020
2020	12P	AUTH	Y	07/25/2020	09/16/2020
2020	30SG	AUTH	N	07/23/2020	09/15/2020
2020	12C	AUTH	Y	07/20/2020	09/15/2020
2020	12P	AUTH	Y	07/20/2020	09/15/2020
2020	12C	AUTH	Y	07/13/2020	09/09/2020
2020	12P	AUTH	Y	07/12/2020	09/09/2020
2020	12C	AUTH	Y	07/06/2020	09/04/2020
2020	12P	AUTH	Y	07/02/2020	08/18/2020
2020	12PR	AUTH	Y	07/02/2020	08/18/2020
2020	12P	AUTH	Y	06/25/2020	08/18/2020
2020	12C	AUTH	Y	06/24/2020	08/18/2020
2020	12C	AUTH	Y	06/15/2020	08/11/2020
2020	12PR	AUTH	Y	06/11/2020	08/10/2020
2020	12SG	AUTH	Y	06/11/2020	08/10/2020
2020	30SGR	AUTH	N	06/11/2020	08/10/2020
2020	12C	AUTH	Y	06/08/2020	08/07/2020
2020	12C	AUTH	Y	06/01/2020	07/30/2020
2020	12P	AUTH	Y	05/28/2020	07/08/2020
2020	30SG	AUTH	N	05/28/2020	07/08/2020
2020	12C	AUTH	Y	05/25/2020	07/08/2020
2020	12C	AUTH	Y	05/18/2020	06/29/2020
2020	12PR	AUTH	Y	05/14/2020	06/18/2020



AF Performance Goals

(Confidential and Sensitive)

Processed - No committees

Action Date

(b) (7)(E)

2020	12P	AUTH	Y	05/07/2020	06/18/2020
2020	12C	AUTH	Y	05/02/2020	06/18/2020
2020	12C	AUTH	Y	05/01/2020	06/18/2020
2020	12C	AUTH	Y	04/30/2020	06/16/2020
2020	12PR	AUTH	Y	04/30/2020	06/18/2020
2020	12SG	AUTH	Y	04/30/2020	06/18/2020
2020	12SGR	AUTH	Y	04/30/2020	06/18/2020
2020	12C	AUTH	Y	04/29/2020	06/16/2020
2020	12C	AUTH	Y	04/25/2020	06/16/2020
2020	12P	AUTH	Y	04/23/2020	06/15/2020
2020	12C	AUTH	Y	04/20/2020	06/15/2020
2020	12SG	AUTH	Y	04/16/2020	06/15/2020
2020	12C	AUTH	Y	04/13/2020	05/18/2020
2020	12C	AUTH	Y	04/06/2020	05/18/2020
2020	30SG	AUTH	N	04/02/2020	05/04/2020
2020	12C	AUTH	Y	03/23/2020	04/30/2020
2020	12PR	AUTH	Y	03/19/2020	04/28/2020
2020	12C	AUTH	Y	03/09/2020	04/28/2020
2020	12C	AUTH	Y	03/02/2020	04/27/2020
2020	12P	AUTH	Y	02/27/2020	04/14/2020
2020	12C	AUTH	Y	02/24/2020	04/14/2020
2020	12SG	AUTH	Y	02/20/2020	04/07/2020
2020	12SP	AUTH	Y	02/06/2020	03/30/2020
2020	12SP	AUTH	Y	01/23/2020	03/23/2020

Total AF Reports Processed-No Committees 55

Average Processing Days 50.33

(b) (7)(E)

Percentage to Goal 100.00%



AF Performance Goals

(Confidential and Sensitive)

Total AF Reports 82

Average Processing Days 51.02

(b) (7)(E)

Percentage to Goal 100.00%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters
RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2018	48H	3730	C00665554	09/30/2019	11/21/2019	52	Y
2018	48H	3738	C00675215	10/21/2019	12/12/2019	52	Y
2020	M2	3783	C00406645	08/07/2020	09/28/2020	52	Y
2020	M3	3799	C00406645	08/07/2020	09/28/2020	52	Y
2020	Q1	3808	C00002832	08/05/2020	09/14/2020	40	Y
2020	Q1	3830	C00002840	08/05/2020	09/14/2020	40	Y
2020	Q1	3832	C00578187	07/15/2020	08/13/2020	29	Y
2020	M5	3844	C00406645	08/07/2020	09/28/2020	52	Y

Total Challenges Processed 8

Average Processing Days 46.13

Total Reports Processed within 60 Days 8

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

Administrative Fine Program Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$131,164	\$318,495	\$530,868

(b) (7)(E)

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

January 29, 2021

MEMORANDUM

AGENDA DOCUMENT NO. X21-06
AGENDA ITEM
For the meeting of February 9, 2021

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista Roche *KJR*
Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Dayna C. Brown *DCB*
Acting Assistant Staff Director
Audit Division

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2021 – 1st Quarter Highlights (10/1/20 – 12/31/20)

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the first quarter of FY 2021 (10/1/20 – 12/31/20). The intent of this document is to provide an update of the workload and achieved results of the Office of Compliance on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during an upcoming Executive Session.

The attached **Appendix A** provides the Commission with fourth quarter highlights for each office and a statistical overview of FY 2021 results and progression towards meeting the goals outlined within the 2018-2022 Strategic Plan adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled ‘Proposed Final Audit Report – Due Date’ which highlights the report manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2021 statistics for meeting strategic performance goals related to the Administrative Fine Program. **Appendix F** (AF Penalties Assessed and Collected) shows the total amount of penalties assessed and collection rate for FY 2015 – 2021.

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the document.

Alternative Dispute Resolution Office (ADRO)

In the first quarter of FY 2021, ADRO received 11 matters, including 9 cases from RAD and 2 from OGC. During this time period, the ADRO closed 1 matter. The Commission assessed \$2,250 in civil penalties and collected \$22,235.

During the first quarter, the ADRO circulated recommendations in 7 matters. (b) (7)(E)

After several approvals upon the restoration of a quorum, there are currently 12 matters pending with the Commission for a vote.

In the first quarter of FY 2021, ADRO staff continued to work with OCIO to implement enhancements to its case management software, Law Manager, in order to increase office efficiency. ADRO provided internal education to staff to enhance negotiation skills. The ADR Specialist served on the Engagement Steering Committee and the Diversity, Equity, and Inclusion Council. Two ADRO staff members attended virtual COGEL, and the ADR Specialist completed coursework at Harvard’s Program on Negotiation.

Administrative Fine Program (Office of Administrative Review)

During the first quarter of FY 2021, RAD processed 9 Reason to Believe (RTB) and 22 Final Determination (FD) recommendation memoranda. (b) (7)(E)

OAR processed Reviewing Officer Recommendations (RORs) for 13 cases during the first quarter, completing its review of challenges received in FY 2020. OAR forwarded 100% of these RORs within 60 days, thus exceeding the strategic goal of processing 75% of RORs within 60 days of the challenge receipt date. OAR also processed 12 FD recommendation memoranda during the first quarter. There are currently 19 Administrative Fine Program memoranda pending with the Commission.

OAR processed \$59,582 in Administrative Fine payments during the first quarter of FY 2021 and continued to assist with financial reporting for all civil money penalties assessed by the Commission. OAR also collaborated with OCIO to make corrections and enhancements to the OGC and ADRO financial reports to increase efficiency in monthly reporting. OAR is expecting the Commission will receive a high volume of Administrative Fine challenges and payments in the second quarter in response to the mass approval of RTB findings in January 2021.

Audit Division (Audit)

During the first quarter of FY 2021, the Audit Division (Audit) processed the following audit reports:

	Audit Report Stage	Number of Reports
Released to Public	Final Audit Report	0
Sent to the Committee	Interim Audit Report	0
	Draft Final Audit Report	3
Circulated to the Commission	Interim Audit Report (<i>informational and no-objection basis</i>)	1
	Audit Division Recommendation Memorandum	1
	Proposed Final Audit Report	1
Forwarded to OGC	Interim Audit Report	3
	Draft Final Audit Report	1
	Audit Division Recommendation Memorandum	1
	Total # of Audit Reports	11

Audit has a total of 16 open audits. Four of these audits are authorized committees and 12 audits are unauthorized committees. The Commission approved the Proposed Final Audit Report in a 17th audit on January 11, 2021.

The Commission voted on the Audit Division Recommendation Memorandum for the one remaining 2016 cycle audit on January 28, 2021 and the Proposed Final Audit Report is currently being prepared.

For the 2018 cycle, there are 4 ongoing authorized committee audits. One Interim Audit Report and one Audit Division Recommendation Memorandum are pending before the Commission, and one audit is in the Proposed Final Audit Report writing stage. The remaining audit continues to be on hold given that Audit has not received the records necessary to commence fieldwork. (b) (5), (b) (7)(A)

The Audit

Division most recently circulated an informational update to the Commission on December 16, 2020 and will provide a further update in March 2021.

The remaining 11 open audits are for unauthorized committees. Fieldwork has concluded in 10 of the audits, with an exit conference scheduled to take place in February for the remaining audit. Of the 10 audits in the post-fieldwork stage, four are in the Interim Audit Report writing stage, one Interim Audit Report was approved in the January 28, 2021 Executive Session and is being prepared to be provided to the committee for comment, one is in the Audit Division Recommendation Memorandum writing stage following the Audit Hearing held on January 28, 2021, one is in the Proposed Final Audit Report writing stage, and three are with the OGC Compliance Advice Team (OGC-CAT) for legal analysis of the Interim Audit Report.

(b) (7) (E)

With respect to the Presidential Election Campaign Fund (PECF), Audit forwarded four 508 accessibility compliant monthly PECF reports received from the U.S. Treasury, to the Office of Chief Information Officer (OCIO) for web placement. In addition, Audit prepared the preliminary budget estimate calculations for the next ten fiscal years, 2021 – 2031. However, the Commission has not yet received the U.S. Treasury’s annual request for the budgetary figures. Audit inquired as to whether such request will be forthcoming, however, the U.S. Treasury has not advised further. The Internal Revenue Service liaison provided Audit with the fiscal year 2020 check-off rates for PECF.

(b) (5)

Audit provided assistance to OGC Enforcement in one matter and to ADRO in one matter and completed (UAT) with Windows 10 and Office 2016 for the Download Application, Audit Sampling Program, and the Audit Status Database. TeamMate Champions also continued to conduct market research on various replacement electronic workpaper systems, given that the current system is slated for a 2023 end-of-life. Audit conducted two series of UAT with the Audit Sampling Program.

In October and November, respectively, Audit held internal, division-wide training on reviewing media disbursements and parent-memo transactions. Each member of the Audit Division also successfully completed their required Continued Professional Education hours for the 2019-2020 cycle. The Audit staff also continued efforts to make all 2017-2018 Audit reports and documents placed on the FEC’s website 508 compliant. Additionally, Audit is creating a 508 compliance instruction manual for staff.

During the first quarter, Audit completed the interview process for two additional Auditors, from which one new Auditor was selected and will onboard February 16, 2021. In addition, one tenured Auditor will retire from the Commission on February 27, 2021.

Reports Analysis Division (RAD)

During the first quarter of FY 2021, RAD Reports Processing Branch staff worked diligently to ensure the unprecedented volume of transaction level data was processed and made publicly available in a timely manner. During 2020, staff processed a 400% increase in transactions when compared to the 2016 presidential election year. In addition, RAD staff continued volunteering to report to the building weekly in order to scan and process paper reports as part of the Phase 1 reopening of agency operations. Also, during the first quarter, RAD management circulated proposed recommendations for the 2021-2022 RAD Review and Referral Procedures to Commission offices for review and comment and met with two offices to address questions. The document was circulated to the Commission for a vote in December and we hope to receive approval quickly in order to begin the review of 2021 reports promptly.

During the first quarter, RAD staff reviewed a total of 31,042 documents totaling 59,283,494 pages and 97% of the reports were reviewed within 90 days of receipt, thus exceeding the strategic goal of 75% of reports reviewed within 90 days of receipt. RAD generated and sent 2,206 letters to the filing community and 91% of RFAs were sent within 40 days of the report review date. Also, during the first quarter, RAD generated 11 referrals (2 OGC, 9 ADRO) and sent 2,815 non-filer notices where the Commission approved recommendations to publish 33 authorized committees for failure to timely file an election-sensitive report. In addition, RAD staff handled 4,545 phone calls and 288 emails. The Reports Processing Branch coded 63,428,038 transactions, 1,827 documents and processed 1,451 pages from 109 documents in the Paper Conversion system.

RAD continued its commitment to training, outreach and assistance during the first quarter. RAD staff conducted tailored training for four 2018 cycle audit eligible party committees, collaborated with the Information Division on a Winding Down the Campaign webinar, and reviewed and commented on Tips for Treasurers covering recount donations and earmarked contributions and Record articles covering guidance for the Georgia runoff and the 30 Day Post-General reporting reminder. In addition, RAD staff reviewed and/or developed content for the FEC website including reporting examples for payroll deductions and bitcoin contributions, a revision to the candidate loan reporting example, and a new webpage for requests for legal consideration by the Commission. In the area of assistance, RAD assisted OGC with 24 matters, ADRO with 2 matters, the Audit Division with 6 matters, the Information Division with 3 matters, the Press Office with 3 matters, and responded to 10 inquiries from Commission offices.

Regarding training, RAD Managers completed OPM Supervisory training to satisfy the three-year management training requirement and participated in an OPM 360 Leadership Assessment to solicit feedback from colleagues and team members. Finally, two RAD team members served on the Diversity, Equity and Inclusion Council.

In the area of personnel during first quarter, a Data Disclosure Assistant retired, a Senior Campaign Finance and Reviewing Analyst transferred to the Information Division, and a Senior Campaign Finance Analyst accepted a detail opportunity in the Office of the Chief Financial Officer (OCFO). RAD welcomed two new Campaign Finance Analysts (CFA) and one Coding Clerk during the first quarter. We are awaiting Commission approval to backfill a Coding Clerk,

Authorized Branch Assistant Branch Chief, and two Senior Campaign Finance and Reviewing Analyst (GS-12) positions. Further, we previously received Commission approval to fill two CFA positions and one Data Disclosure Assistant position for which we are awaiting approval to move forward.

Attachments

Appendix A, FY 2021 Highlights and FY Overview for Office of Compliance Goals

Appendix B, Open Audits Report

Appendix C, Proposed Final Audit Report – Due Date

Appendix D, ADR Civil Penalty Report

Appendix E, AF Performance Goals Report

Appendix F, AF Penalties Assessed and Collected

Status of Compliance

FY 2021
(10/1/2020 – 12/31/2020)

Matters Awaiting a Commission Vote as of 1/29/2021

Audit	Admin Fine Program/OAR	ADRO	Total
2	5/14	12	33

Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (12/31/20)
RAD to code and enter 95% of reports within 30 days of receipt	99.9%	95.9%	99.9%	94.1%	98.5%	79.2%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	99.1%	98.7%	99.0%	99.9%	99.8%	99.9%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%	100%

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2020 Performance Goals	Status 12/31/20
RAD staff provided extended phone coverage from 5:30pm to 8:00pm for the 2020 October Quarterly and 30 Day Post-Generals reporting deadline.	The RAD mainline received and directed 41 calls between 5:30pm and 8:00pm on the October 15 th and December 3 rd deadlines.
RAD staff collaborated with the Information Division on a Winding Down the Campaign webinar for Authorized Committees.	The Winding Down the Campaign webinar was held in November 2020.
RAD Assistant Staff Director served as a panelist at the virtual 2020 NABPAC Post-Election Conference.	The conference was held in December 2020.

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 2: Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs

Performance Goals	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21
RAD to review 75% of reports within 90 days of receipt	92.9%	76.6%	92.2%	76%	91.9%	97%
RAD to send 75% of RFAs within 40 days of report review	92%	88%	88%	85%	86%	91%
(b) (7)(E)	100%	96.2%	96.9%	88%	100%	100%
	56%	25%	45%	100%	N/A	N/A
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	81.8%	96.67%	100%	97%	100%	100%
(b) (7)(E)	100%	100%	99%	100%	100%	100%

1 - No PFARs were circulated this quarter.

Strategic Objective 4: Foster a Culture of High Performance

Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (12/31/20)
RAD	Documents/ Transactions Coded	53,107/ 19,385,479	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828	4,873/ 63,983,177	1,827/ 63,428,038
	Documents/Pages Processed in Paper Automation/ Conversion System	N/A	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417	1,771/ 18,028	109/ 1,451
	Documents/Pages Reviewed	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699	89,525/ 73,526,421	31,042/ 59,283,494
	Letters sent	13,253	14,796	13,763	12,562	13,838	5,021
	Telephone calls handled	12,362	11,634	13,036	13,149	13,209	4,545
	Email inquiries handled	N/A	N/A	396	658	894	288
	Referrals	43	95	46	82	34	11
	AF Cases RTB/FD	83/33	163/168	95/23	262/93	100/204	0/0
Audit	(b) (7)(E)						
ADRO							
OAR	Cases Received	12	29	8	37	20	1
	Cases Closed (FD)	11	32	10	36	2	0



Open Audits
As of 1/29/2021
(Confidential and Sensitive)

Date of
Last Action

Audit
Manager

Report
Track

Fieldwork

(b) (3) (A)
(b) (3) (A)

Total - 2

Interim/Preliminary Report Writing

2018 THE UTE PAC

C00626671

09/14/2020

Morcomb

B

2018 DEMOCRACY ENGINE, INC., PAC

C00468314

IAR

12/14/2020

Burgess

B

(b) (3) (A)

Total - 5

Audit Division Recommendation Memorandum Writing

2018 GRASSROOTS VICTORY PAC

C00608380

01/28/2021

Burgess

B

Total - 1

Proposed Final Audit Report Writing

2018 VAN DREW FOR CONGRESS

C00661868

01/11/2021

Burgess

B

2018 NATIONAL TOOLING & MACHINING ASSOCIATION
(NTMA) COMMITTEE FOR A STRONG ECONOMY

C00043091

01/14/2021

Lee

B

2016 MISSISSIPPI REPUBLICAN PARTY

C00084368

01/28/2021

Pacious

B

Total - 3

Audits in OGC

(b) (3) (A)

2018 CONNECTICUT DEMOCRATIC STATE CENTRAL
COMMITTEE

C00167320

IAR

12/22/2020

Pacious

B

2018 REPUBLICAN PARTY OF MINNESOTA - FEDERAL

C00001313

IAR

12/28/2020

Morcomb

B

Total - 3

Audits with the Commission

2018 MIKE BRAUN FOR INDIANA

C00653147

IAR

09/17/2020

Morcomb

B

2018 DR. RAUL RUIZ FOR CONGRESS

C00502575

ADRM

01/08/2021

Smith

B

Total - 2



Open Audits

As of 1/29/2021
(Confidential and Sensitive)

16 Open Audits

Legend

Track B	Audits with findings
Track C	Audits with <u>no</u> findings
IAR	Interim Audit Report
PAR	Preliminary Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report
Text	If text is red, the report has not been sent to OGC for a legal analysis



Open Audits

As of 1/29/2021
(Confidential and Sensitive)

Audit Caseload

Audit Manager	Number of Audits	Percent of Total Audits ¹
Burgess	4	25%
Lee	1	6%
Morcomb	3	19%
Pacious	4	25%
Smith	4	25%
Totals	16	100%

¹ May not total 100% due to rounding



Open Audits

As of 1/29/2021

(Confidential and Sensitive)

Comments

2016

Mississippi Republican Party

(b) (5)

2018

(b) (3) (A)

(b) (5)

(b) (3) (A)

(b) (5)

Connecticut Democratic State Central Committee

(b) (5)

Democracy Engine PAC

(b) (5)

(b) (3) (A)

(b) (5)

Dr. Raul Ruiz for Congress

(b) (5)

Grassroots Victory PAC

(b) (5)

(b) (3) (A)

(b) (5)

Mike Braun for Indiana

(b) (5)

National Tooling & Machining Association Committee for a Strong Economy

(b) (5)

Republican Party of Minnesota - Federal

(b) (5)

(b) (3) (A)

(b) (5)

The UTE PAC

(b) (5)

(b) (3) (A)

(b) (5)

Van Drew for Congress

(b) (5)



Proposed Final Audit Report - Due Date

As of 1/29/2021

(Confidential and Sensitive)

(b) (7)(E)

	<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2016 MISSISSIPPI REPUBLICAN PARTY	Pacious	PFAR	Report Writing	01/26/2018
2018 DR. RAUL RUIZ FOR CONGRESS	Smith	ADRM	Circulated to Commission	04/25/2019
2018 VAN DREW FOR CONGRESS	Burgess	PFAR	Report Writing	04/25/2019
2018 MIKE BRAUN FOR INDIANA	Lmorcomb	IAR	Circulated to Commission	04/25/2019
2018 DEMOCRACY ENGINE, INC., PAC	Burgess	IAR	Report Writing	10/02/2019
2018 NATIONAL TOOLING & MACHINING ASSOCIATION (NTMA) COMMITTEE FOR A STRONG ECONOMY	Lee	PFAR	Report Writing	10/02/2019

(b) (3) (A)

2018 REPUBLICAN PARTY OF MINNESOTA - FEDERAL	Lmorcomb	IAR	OGC Reviewing	10/02/2019
2018 CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE	Pacious	IAR	OGC Reviewing	10/02/2019

(b) (3) (A)

2018 GRASSROOTS VICTORY PAC	Burgess	ADRM	Memorandum Writing	10/02/2019
2018 THE UTE PAC	Lmorcomb	IAR	Report Writing	10/02/2019

(b) (3) (A)

(b) (3) (A)



Proposed Final Audit Report - Due Date

As of 1/29/2021

(Confidential and Sensitive)

16 Open Audits

Legend

IAR	Interim Audit Report
PAR	Preliminary Audit Report
DFAR	Draft Final Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year: 10/01/2019 To: 09/30/2021

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY -2020	912	North Dakota Republican Party Hacker, Nicholas P.	\$8,000.00	07/25/2020	\$8,000.00	08/11/2020	\$0.00	Develop a FEC Compliance Manual	08/24/2020	08/24/2020
	914	Idaho State Democratic Party Hayes, LeRoy	\$4,525.00	07/31/2020	\$4,525.00	07/27/2020	\$0.00	Attend FEC seminar	07/01/2021	
	916	Allen, Levi United Mine Workers of America Power PAC	\$9,000.00	07/31/2020	\$9,000.00	09/02/2020	\$0.00	Develop a FEC Compliance Manual	08/31/2020	09/17/2020
	917	Ruppert, Jeffrey A. Elevate Ohio	\$1,955.00	07/31/2020	\$1,955.00	07/17/2020	\$0.00	Attend FEC seminar	07/01/2021	09/01/2020
	918	Engineers Political Education Committee (EPEC)/International Union of Operating Engineers Hickey, Brian E.	\$8,175.00	07/31/2020	\$8,175.00	07/30/2020	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	07/01/2021 09/29/2020	
	919	Mackey, Tim LIUNA Minnesota & North Dakota/Laborers' District Council of Minnesota & North Dakota	\$9,950.00	07/29/2020	\$9,950.00	08/13/2020	\$0.00	Develop a FEC Compliance Manual	06/29/2021	
	921	Scalise for Congress Ottenhoff, Benjamin	\$2,300.00	07/31/2020	\$2,300.00	07/24/2020	\$0.00	Attend FEC seminar	07/01/2021	
	922	Hudson, Gerald	\$12,100.00	07/31/2020	\$12,100.00	08/13/2020	\$0.00	Conduct internal education program for employees or staff	09/29/2020	10/08/2020

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		United We Can						Conduct internal education program for employees or staff	09/29/2020	10/08/2020
	923	Oklahoma Democratic Party Hunsucker, Rachael	\$19,450.00	08/14/2020	\$19,450.00	08/11/2020	\$0.00	Attend FEC seminar	01/15/2021	12/08/2020
								Develop RFAI tracking & response procedures	08/14/2020	07/31/2020
	924	Kallabat, Zinnia Working Michigan (SuperPac)	\$4,500.00	08/14/2020	\$4,500.00	08/06/2020	\$0.00	Attend FEC seminar	07/15/2021	09/02/2020
								Develop a FEC Compliance Manual	10/13/2020	09/26/2020
	925	Massachusetts Republican Party Andersen, Brent	\$5,450.00	08/02/2020	\$5,450.00	10/05/2020	\$0.00	Attend FEC seminar	07/03/2021	
	926	Campos Hernandez, Oriol Todos con Jennifer Inc. DBA Jennifer for Congress	\$5,900.00	07/31/2020	\$5,900.00	07/22/2020	\$0.00	Attend FEC seminar	07/21/2021	
	927	Michigan Republican Party (Registered Cmte) Meyers, Carl	\$37,500.00	07/31/2020	\$37,500.00	07/23/2020	\$0.00	Attend FEC seminar	07/01/2021	09/01/2020
	928	Deaglan McEachern for Congress Tiernan, Lori	\$3,450.00	08/05/2020	\$3,450.00	10/02/2020	\$0.00	Committee will file for termination	10/04/2020	10/15/2020
	929	Lux, Michael Fair and Balanced PAC	\$2,300.00	07/31/2020	\$2,300.00	08/03/2020	\$0.00	Attend FEC seminar	07/01/2021	
	930	Ramirez, Ronald Conservative Triumph Fund	\$2,150.00	07/31/2020	\$2,150.00	12/17/2019	\$0.00	Attend FEC seminar	07/01/2021	06/24/2020
								Develop a FEC Compliance Manual	09/29/2020	
	931	Patients for Affordable Drugs Action Wakana, Benjamin L.	\$6,950.00	07/31/2020	\$6,950.00	07/24/2020	\$0.00	Attend FEC seminar	07/01/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	932	Stoltz, Gail For Our Future	\$2,475.00	07/31/2020	\$2,475.00	08/03/2020	\$0.00	Attend FEC seminar	07/01/2021	
	933	New Jersey Republican State Committee Bengivenga, April	\$5,030.00	07/31/2020	\$5,030.00	09/02/2020	\$0.00	Attend FEC seminar Develop RFAI tracking & response procedures	01/01/2021 07/31/2020	11/19/2020 07/31/2020
	934	Oklahoma Democratic Party Hunsucker, Rachael	\$0.00	07/15/2020				Not Applicable	07/15/2020	12/08/2020
	936	Svoboda, Brian G. Morris, Cindy	\$2,900.00	07/31/2020	\$2,900.00	07/31/2020	\$0.00	Attend FEC seminar	07/01/2021	
	937	Planned Parenthood Votes Barrow-Klein, Vickie	\$4,000.00	07/31/2020	\$4,000.00	08/14/2020	\$0.00	Conduct internal education program for employees or staff	07/01/2021	
	938	Massachusetts Democratic State Committee Yorkis, Paul G.	\$5,550.00	07/31/2020	\$5,550.00	09/14/2020	\$0.00	Attend FEC seminar Develop RFAI tracking & response procedures	01/03/2021 07/31/2020	12/09/2020 07/31/2020
	939	Kahn, Michael Association For Firefighters PAC DBA Association for Firefighters	\$3,850.00	07/31/2020				Attend FEC seminar Develop RFAI tracking & response procedures	07/01/2021 07/31/2020	 07/31/2020
	940	Terry, David Texans for Texas	\$3,175.00	08/02/2020	\$3,175.00	07/24/2020	\$0.00	Committee will file for termination	10/01/2020	07/24/2020
	942	Fight for Tomorrow Mackowiak, Matt L.	\$2,250.00	11/28/2020	\$2,250.00	11/18/2020	\$0.00	Attend FEC seminar	07/01/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
								Develop a FEC Compliance Manual	09/29/2020	
	944	One Nation United Crevecœur-Macphail, Desiree	\$21,675.00	07/21/2021				Attend FEC seminar	07/21/2021	
								Conduct & certify internal audit/reconciliation	07/21/2021	
									07/21/2022	
								Develop a FEC Compliance Manual	10/21/2020	
	946	Utah State Democratic Committee Srivastava, Sheila	\$5,310.00	07/31/2020	\$5,310.00	06/29/2020	\$0.00	Attend FEC seminar	01/04/2021	11/20/2020
								Develop RFAI tracking & response procedures	07/31/2020	07/31/2020
	947	Build the Wave Lerner, Nathan	\$4,125.00	05/03/2021	\$4,125.00	12/07/2020	\$0.00	Attend FEC seminar	08/06/2021	
								Develop a FEC Compliance Manual	11/04/2020	
	948	Human Rights Campaign Equality Votes Rinefierd, James M.	\$2,350.00	07/31/2020	\$2,350.00	08/19/2020	\$0.00	Attend FEC seminar	07/01/2021	
								Develop a FEC Compliance Manual	09/29/2020	09/29/2020
	949	Bayer U.S. LLC Political Action Committee Branca, Brian	\$6,250.00	09/05/2020	\$6,250.00	08/24/2020	\$0.00	Attend FEC seminar	08/06/2021	
								Conduct internal education program for employees or staff	11/04/2020	10/06/2020
								Develop a FEC Compliance Manual	11/04/2020	10/06/2020
	950	Arizona Republican Party Lettieri, Bob	\$3,900.00	07/31/2020	\$3,900.00	09/02/2020	\$0.00	Adopt and distribute policy regarding contributions to federal elections	07/31/2020	02/03/2020
	952	CASA in Action PAC	\$13,500.00	07/31/2020	\$13,500.00	09/02/2020	\$0.00	Attend FEC seminar	07/01/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		Guzman, Melissa						Attend FEC seminar Conduct & certify internal audit/reconciliation Develop a FEC Compliance Manual	07/01/2021 07/31/2020 09/29/2020	
	953	Hotel Workers for Stronger Communities	\$2,900.00	07/31/2020	\$2,900.00	08/12/2020	\$0.00	Attend FEC seminar Other	07/01/2021 07/31/2020	08/28/2020
	954	Kutac, Paul Americans for Police and Trooper Safety	\$3,000.00	07/31/2020	\$3,000.00	08/20/2020	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	07/01/2021 09/29/2020	09/29/2020
	956	Zucker, Jonathan It Starts Today	\$5,450.00	07/31/2020	\$5,450.00	08/03/2020	\$0.00	Attend FEC seminar Conduct & certify internal audit/reconciliation Develop a FEC Compliance Manual	07/01/2021 07/01/2021 09/29/2020	09/29/2020
Sub-Total : FY-2020			\$241,345.00		\$215,820.00		\$0.00			
FY-2021	955	Varban, Alex Americans for Prosperity Action, Inc.(AFP Action)	\$18,350.00	02/18/2021				Attend FEC seminar Develop a FEC Compliance Manual	01/19/2021 04/19/2021	
	961	DNC Services Corp / Democratic National Committee Derrough, William Q.	\$10,500.00	02/18/2021	\$10,500.00	01/28/2021	\$0.00	Attend FEC seminar	01/19/2022	
	963	Communities for a New California C4	\$6,400.00	01/14/2022				Attend FEC seminar Other	01/19/2022 02/18/2021	
	968	Friends of John Delaney	\$5,000.00	02/18/2021	\$5,000.00	01/26/2021	\$0.00	Attend FEC seminar	01/19/2022	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		Nordberg, Edward P.						Attend FEC seminar	01/19/2022	
	973	Phillips, Robert GRIT PAC	\$1,900.00	02/18/2021	\$1,900.00	10/05/2020	\$0.00	Attend FEC seminar	01/19/2022	
								Other	02/18/2021	
Sub-Total : FY -2021			\$42,150.00		\$17,400.00		\$0.00			
Grand Total :			\$283,495.00		\$233,220.00		\$0.00			



AF Performance Goals

Print Date: January 29, 2021

Selected Parameters:

Office: Both

Start Date: 10/01/2020

End Date: 12/31/2020

*Exception: YES



AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date
------	------	-------------	--------------------	----------	---------------

Processed

2020	12G	AUTH	Y	10/22/2020	12/14/2020
2020	12G	UNAUTH_M	Y	10/22/2020	12/14/2020
2020	M10	P_UNAUTH	N	10/20/2020	12/10/2020
2020	M10	P_UNAUTH	Y	10/20/2020	12/10/2020
2020	Q3	H_S_P_UNAUTH	N	10/15/2020	12/10/2020
2020	Q3	H_S_P_UNAUTH	Y	10/15/2020	12/03/2020
2020	M9	P_UNAUTH	N	09/20/2020	11/16/2020
2020	12P	AUTH	Y	08/27/2020	10/13/2020
2020	M8	P_UNAUTH	N	08/20/2020	10/13/2020

Total AF Reports Processed 9

Average Processing Days 52.33

Percentage to Goal 100.00%

Processed - No committees

				Action Date
2020	12SGR	AUTH	Y	11/19/2020
2020	12GR	AUTH	Y	11/05/2020
2020	30SG	AUTH	N	10/29/2020
2020	12SG	AUTH	Y	10/22/2020
2020	12SG	AUTH	Y	09/17/2020
2020	12P	AUTH	Y	09/03/2020
2020	12P	AUTH	Y	08/20/2020



AF Performance Goals

(Confidential and Sensitive)

Total AF Reports Processed-No Committees	7
Average Processing Days	42.00
(b) (7)(E)	
Percentage to Goal	100.00%

Total AF Reports	16
Average Processing Days	47.81
(b) (7)(E)	
Percentage to Goal	100.00%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters
RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2019	MY	3748	C00634964	08/07/2020	10/06/2020	60	Y
2019	M8	3749	C00008409	09/24/2020	11/23/2020	60	Y
2019	Q3	3758	C00615013	09/08/2020	11/06/2020	59	Y
2019	YE	3776	C00634964	08/07/2020	10/06/2020	60	Y
2019	YE	3778	C00615013	09/08/2020	11/06/2020	59	Y
2019	YE	3780	C00426569	08/25/2020	10/23/2020	59	Y
2020	12P	3789	C00676320	08/20/2020	10/19/2020	60	Y
2020	Q1	3816	C00691709	09/17/2020	11/13/2020	57	Y
2020	Q1	3823	C00634964	08/07/2020	10/06/2020	60	Y
2020	Q1	3826	C00615013	09/08/2020	11/06/2020	59	Y
2020	Q1	3827	C00638148	08/08/2020	10/07/2020	60	Y
2020	Q1	3831	C00676320	08/20/2020	10/19/2020	60	Y
2020	12P	3834	C00154625	08/17/2020	10/16/2020	60	Y

Total Challenges Processed 13

Average Processing Days 59.46

Total Reports Processed within 60 Days 13

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

Administrative Fine Program
Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (12/31/20)
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$131,164	\$318,495	\$530,868	\$0

(b) (7)(E)

RECEIVED

By Office of the Commission Secretary at 11:09 am, Apr 30, 2021



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

April 30, 2021

MEMORANDUM

AGENDA DOCUMENT NO. X21-16

AGENDA ITEM

For the meeting of May 4, 2021

SUBMITTED LATE

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista Roche *KJR*
Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Dayna C. Brown *PCO for DCB*
Acting Assistant Staff Director
Audit Division

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2021 – 2nd Quarter Highlights (1/1/21 – 3/31/21)

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the second quarter of FY 2021 (1/1/21 – 3/31/21). The intent of this document is to provide an update of the workload and achieved results of the Office of Compliance on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during an upcoming Executive Session.

The attached **Appendix A** provides the Commission with fourth quarter highlights for each office and a statistical overview of FY 2021 results and progression towards meeting the goals outlined within the 2018-2022 Strategic Plan adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled ‘Proposed Final Audit Report – Due Date’ which highlights the report manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2021 statistics for meeting strategic performance goals related to the Administrative Fine Program. **Appendix F** (AF Penalties Assessed and Collected) shows the total amount of penalties assessed and collection rate for FY 2015 – 2021.

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the document.

Alternative Dispute Resolution Office (ADRO)

In the second quarter of FY 2021, the ADRO received 15 cases including 12 from the Reports Analysis Division (RAD), 2 from OGC, and 1 directly from the Commission. During this time period, the ADRO closed 19 matters - 18 approved Negotiated Settlements and 1 approved dismissal. The Commission assessed \$96,115 in civil penalties and collected \$64,770 during the quarter.

(b) (7)(E)

There are currently 5 matters pending with the Commission for a vote.

In the second quarter of FY 2021, ADRO staff continued to work with OCIO to implement enhancements to its case management software, Law Manager, to increase office efficiency. Specifically, new templates were deployed to reduce staff time required to produce routine correspondence and case-related documents. Additionally, ADRO developed and implemented a new case tracking database to manage our workflow. The ADR Specialist served on the Engagement Steering Committee and the Diversity, Equity, and Inclusion Council. Two ADRO staff members completed Conflict Coaching training. The office posted for a GS-13 ADR Specialist position, which will be filled in the third quarter of the fiscal year.

Administrative Fine Program (Office of Administrative Review)

During the second quarter of FY 2021, the Commission processed 244 Reason to Believe (RTB) findings. OAR received challenges in 20 cases and processed 2 Reviewing Officer Recommendations (RORs). The Commission reviewed final determination recommendations in 93 cases, made a final determination that the respondents in 90 cases violated 52 U.S.C. § 30104(a), and assessed \$320,902 in civil penalties. The Commission also collected \$62,590 in fine payments and prepared 86 cases for public release.

(b) (7)(E)

Additionally, OAR forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

In the second quarter, the Reviewing Officer collaborated with OGC and ADRO to provide responsive materials to a FOIA request related to unpaid civil money penalties. OAR also began to collaborate with OCIO to develop a new Administrative Fines search system for the website. This new search system will eventually replace the current Administrative Fines search within the Enforcement Query System.

Audit Division (Audit)

During the second quarter of FY 2021, the Audit Division (Audit) processed the following audit reports:

	Audit Report Stage	Number of Reports
Approved by Commission	Final Audit Report	4
Sent to the Committee	Interim Audit Report	2
	Draft Final Audit Report	0
Circulated to Commission	Interim Audit Report (<i>informational and no-objection basis</i>)	0
	Audit Division Recommendation Memorandum	2
	Proposed Final Audit Report	3
Forwarded to OGC	Interim Audit Report	2
	Draft Final Audit Report	0
	Audit Division Recommendation Memorandum	2
	Total # of Audit Reports	15

As of the date of this memorandum, Audit has a total of 18 open audits, including three 2018 authorized committee audits; nine 2018 unauthorized committee audits; and six 2020 authorized committee audits, for which audits commenced on April 28, 2021, following the Commission's April 22nd approval.

For the 2018 cycle authorized committee audits, (b) (5)

The recommendation of the Office of General Counsel's Compliance Advice Team (OGC-CAT) is currently pending before the Commission. The Proposed Final Audit Report of the second authorized committee audit is also

currently pending before the Commission. The remaining audit continues to be on hold given that Audit has not received the records necessary to commence fieldwork. (b) (5), (b) (7)(A), (b) (3) (A)

This recommendation is likewise pending before the Commission.

Regarding the nine 2018 unauthorized committee audits, two are in the Interim Audit Report writing stage; two have been analyzed by OGC-CAT and are being revised accordingly; and two are currently with OGC-CAT for legal analysis. In addition, one audit is in the Draft Final Audit Report writing stage and two Interim Audit Reports are currently pending before the Commission.

(b) (7) (E)

With respect to the Presidential Election Campaign Fund (PECF), Audit forwarded four 508 accessibility compliant monthly PECF reports received from the U.S. Treasury, to the Office of Chief Information Officer (OCIO) for web placement. In addition, Audit updated the annual list of the Commission's authorized signatories for the calendar year 2021 which contained the Commissioners' electronic signatures and provided it to the U.S. Treasury liaison.

(b) (5)

During the second quarter, Audit provided assistance to the Alternative Dispute Resolution Office on one ADRO matter and assisted OGC-CAT in preparing for the Jill Stein Administrative Reviewing Hearing held this quarter. Additionally, Audit held Division meetings during the quarter which included training on Presentation and Public Speaking skills, as well as Preparing for Commission Meetings. Audit also completed the preparation of a comprehensive instructional manual to assist in ensuring that all audit related documents placed on the Commission's website are 508 compliant.

Audit collaborated with OCIO with respect to User Acceptance Testing on TeamMate 12.6, Download Application, Audit Sampling Program, FEC Quality Standards training in Skillport and Audit Status Database. Audit managers collaborated with OGC Compliance Advice, Public Information, and the OCIO web team on the layout of the new Audit webpages, as well as ensuring the data transition was complete and accurate. Audit staff also received new laptops with Windows 10 and Office 2016.

The Annual Mandatory FEC Quality Standards training was completed by all Audit staff. In addition, Audit Managers met with individual Auditors to complete 2021-2022 individual training plans with respect to the Core Competencies. New Auditor training was completed for 2 new staff members.

In February, Audit welcomed a new Auditor to the Division, and she is continuing to progress through Audit's comprehensive training program. Also, during this quarter, a tenured and experienced Auditor retired after 29 years of service to the FEC. A second tenured, experienced and well-respected Auditor retired on April 30th after 22 years with the FEC. Their retirements not only increase the number of Division vacancies, but also represents a great loss in institutional knowledge. The Audit Division currently has 9 Auditor vacancies. As the number of vacancies within the division increases, Audit continues to seek innovative ways to continue to accomplish its mission, and to do so in a timely fashion, such as enlisting the assistance of RAD Campaign Finance Analysts to assist with certain reviews.

Reports Analysis Division (RAD)

During the second quarter of FY 2021, RAD management worked with Commission offices to gain approval of the 2021-2022 RAD Review & Referral Procedures. RAD staff has been trained on the changes and review of the 2021 reports has begun. In addition, we are in the process of completing a redacted version of the document to be circulated for Commission approval and posted on the FEC website. RAD also referred six Authorized committees to the Audit Division for the 2019-2020 election cycle, which were approved by the Commission. We are currently in the process of making assessments for Party committees and PACs and will send our audit referral recommendations to the Audit Division in July. Also, during the second quarter, Reports Processing Branch staff continued to report to the building on a weekly basis to process paper documents, ensuring they were made publicly available timely and that the 48-hour statutory requirement was met.

During the second quarter, RAD staff reviewed a total of 33,332 documents totaling 102,386,652 pages and 82% of the reports were reviewed within 90 days of receipt, exceeding the strategic goal of 75% of reports reviewed within 90 days of receipt. RAD generated and sent 3,781 letters to the filing community and 92% of RFAIs were sent within 40 days of the report review date. Also, during the second quarter, RAD generated 25 referrals (12 ADRO, 6 Audit, 7 Administrative Fine) and sent 1,398 non-filer notices. In addition, RAD staff handled 3,405 phone calls and 233 emails. The Reports Processing Branch coded 53,828,278 transactions, 3,099 documents and processed 9,906 pages from 1,083 documents in the Paper Conversion system.

RAD staff was active in providing training, outreach and assistance during the second quarter. RAD staff conducted campaign guide training for a new Auditor and collaborated with the Information Division on Candidate Committee, Party/PAC, Corporate PAC, Member/Labor PAC and FECfile webinars. RAD staff also reviewed and commented on Record articles covering Reports Due in 2021, the Louisiana Special elections, the Texas-06 Special election and the April 2021 Reporting Reminder, as well as a Tip for Treasurers addressing Candidate registration when the district is uncertain. In addition, RAD staff assisted the Press Office with the vetting of the 21-month statistical summary and collaborated with the Electronic Filing Office to facilitate the 2020 Year End, 2021 February Monthly, and 2021 March Monthly reporting reminders for electronic filers. In the area of assistance, RAD assisted OGC with 54 matters, ADRO with 4 matters, the Audit Division with 10 matters, the Press Office with 4 matters, and responded to 37 inquiries from Commission offices.

In the area of personnel during second quarter, RAD filled an Assistant Branch Chief position, a Campaign Finance Analyst (CFA) transferred to another agency, and another CFA recently left the agency. In addition, a Coding Clerk staff member provided notification of retirement for later this year and we expect additional tenured Reports Processing Branch staff members to follow in the near future. As we currently have three vacant Coding Clerk positions, there is concern that with a pending retirement and the likelihood of others, we will not be equipped to handle the volume of reports and transactions expected in 2022. In addition, RAD currently has six vacant CFA positions and one CFA on detail with the OCFO, raising concerns about the speed at which we will be able to conduct the review of 2021-2022 cycle reports. Finally, Mid-Year performance assessments were completed for all RAD managers during the second quarter.

Attachments

Appendix A, FY 2021 Highlights and FY Overview for Office of Compliance Goals

Appendix B, Open Audits Report

Appendix C, Proposed Final Audit Report – Due Date

Appendix D, ADR Civil Penalty Report

Appendix E, AF Performance Goals Report

Appendix F, AF Penalties Assessed and Collected

Status of Compliance

FY 2021
(10/1/2020 – 3/31/2021)

Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (3/31/21)
RAD to code and enter 95% of reports within 30 days of receipt	99.9%	95.9%	99.9%	94.1%	98.5%	85.5%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	99.1%	98.7%	99.0%	99.9%	99.8%	99.9%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%	100%

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2020 Performance Goals	Status 3/31/21
RAD staff provided extended phone coverage from 5:30pm to 8:00pm for the 2020 Year End reporting deadline.	The RAD mainline received and directed 6 calls between 5:30pm and 8:00pm for the 2021 Year End filing deadline and handled a total of 139 calls.
RAD staff collaborated with the Information Division on the following webinars: Candidate Committee, Party/PAC, Corporate PAC, Member/Labor PAC and FECfile.	The Candidate Committee, Party/PAC and FECfile webinars were held in January 2021, the Corporate PAC and Member/Labor PAC webinars were held in March 2021.
RAD staff collaborated with the Information Division on 4 Record Articles and 1 Tip for Treasurers.	Record Articles were published in January and March 2021 covering Reports Due in 2021, the Louisiana Special elections, the Texas-06 Special election and the April 2021 Reporting Reminder. The Tip for Treasurers addressed Candidate registration when the district is uncertain and was published in April 2021.

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 2: Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs

Performance Goals	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21
RAD to review 75% of reports within 90 days of receipt	92.9%	76.6%	92.2%	76%	91.9%	89%
RAD to send 75% of RFAs within 40 days of report review	92%	88%	88%	85%	86%	92%
(b) (7)(E)	100%	96.2%	96.9%	88%	100%	93%
	56%	25%	45%	100%	N/A	80%
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	81.8%	96.67%	100%	97%	100%	100%
(b) (7)(E)	100%	100%	99%	100%	100%	100%

1 - No PFARs were circulated this quarter.

Strategic Objective 4: Foster a Culture of High Performance

Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (3/31/21)
RAD	Documents/ Transactions Coded	53,107/ 19,385,479	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828	4,873/ 63,983,177	3,099/ 117,256,316
	Documents/Pages Processed in Paper Automation/ Conversion System	N/A	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417	1,771/ 18,028	1,083/ 9,906
	Documents/Pages Reviewed	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699	89,525/ 73,526,421	64,366/ 161,670,101
	Letters sent	13,253	14,796	13,763	12,562	13,838	10,195
	Telephone calls handled	12,362	11,634	13,036	13,149	13,209	7,950
	Email inquiries handled	N/A	N/A	396	658	894	521
	Referrals	43	95	46	82	34	36
	AF Cases RTB/FD	83/33	163/168	95/23	262/93	100/204	244/78
Audit	(b) (7)(E)						
ADRO							
OAR	Cases Received	12	29	8	37	20	20
	Cases Closed (FD)	11	32	10	36	2	14



Open Audits

As of 4/30/2021

(Confidential and Sensitive)

<u>Date of Last Action</u>	<u>Audit Manager</u>	<u>Report Track</u>
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Pre-Audit

(b) (3) (A)

Fieldwork

(b) (3) (A)

Total - 1

Interim/Preliminary Report Writing

(b) (3) (A)

2018 THE UTE PAC	C00626671	04/14/2021	Morcomb	B
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(b) (3) (A)

Total - 4

Interim/Preliminary Audit Report Committee Response Period

2018 MIKE BRAUN FOR INDIANA	C00653147	02/03/2021	Morcomb	B
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Total - 1

Draft Final Audit Report Writing

2018 DEMOCRACY ENGINE, INC., PAC	C00468314	03/23/2021	Burgess	B
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Total - 1

Audits in OGC

(b) (3) (A)

Total - 2

Audits with the Commission

2018 CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE	C00167320	IAR	04/12/2021	Pacious	B
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2018 REPUBLICAN PARTY OF MINNESOTA - FEDERAL	C00001313	IAR	04/21/2021	Morcomb	B
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2018 DR. RAUL RUIZ FOR CONGRESS	C00502575	PFAR	04/22/2021	Smith	B
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Total - 3



Open Audits

As of 4/30/2021

(Confidential and Sensitive)

18 Open Audits

Legend

Track B	Audits with findings
Track C	Audits with <u>no</u> findings
IAR	Interim Audit Report
PAR	Preliminary Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report
Text	If text is red, the report has not been sent to OGC for a legal analysis



Open Audits
As of 4/30/2021
(Confidential and Sensitive)

Audit Caseload

Audit Manager	Number of Audits	Percent of Total Audits ¹
Burgess	3	17%
Morcomb	4	22%
Pacious	4	22%
Smith	5	28%
Yarbrough	2	11%
Totals	18	100%

¹ May not total 100% due to rounding



Open Audits

As of 4/30/2021

(Confidential and Sensitive)

Comments

2018

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)

Connecticut Democratic State Central Committee
(b) (5)

Democracy Engine PAC
(b) (5)

(b) (3) (A)
(b) (5)

Dr. Raul Ruiz for Congress
(b) (5)

(b) (3) (A)
(b) (5)

Mike Braun for Indiana
(b) (5)

Republican Party of Minnesota - Federal
(b) (5)

(b) (3) (A)
(b) (5)

The UTE PAC
(b) (5)

(b) (3) (A)
(b) (5)

2020

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)



Open Audits

As of 4/30/2021

(Confidential and Sensitive)

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)



Proposed Final Audit Report - Due Date

As of 4/30/2021

(Confidential and Sensitive)

		<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2018	DR. RAUL RUIZ FOR CONGRESS	Smith	PFAR	Circulated to Commission	04/25/2019
2018	MIKE BRAUN FOR INDIANA	Lmorcomb	IAR	Committee Response Period	04/25/2019
2018	DEMOCRACY ENGINE, INC., PAC	Burgess	DFAR	Report Writing	10/02/2019

(b) (7)(E)

(b) (3) (A)

2018	REPUBLICAN PARTY OF MINNESOTA - FEDERAL	Lmorcomb	IAR	Circulated to Commission	10/02/2019
2018	CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE	Pacious	IAR	Circulated to Commission	10/02/2019

(b) (3) (A)

2018	THE UTE PAC	Lmorcomb	IAR	Report Writing	10/02/2019
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(b) (3) (A)

(b) (3) (A)



Proposed Final Audit Report - Due Date

As of 4/30/2021

(Confidential and Sensitive)

18 Open Audits

Legend

IAR	Interim Audit Report
PAR	Preliminary Audit Report
DFAR	Draft Final Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year: 10/01/2019 To: 09/30/2021

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY -2020	912	North Dakota Republican Party Hacker, Nicholas P.	\$8,000.00	07/25/2020	\$8,000.00	08/11/2020	\$0.00	Develop a FEC Compliance Manual	08/24/2020	08/24/2020
	914	Idaho State Democratic Party Hayes, LeRoy	\$4,525.00	07/31/2020	\$4,525.00	07/27/2020	\$0.00	Attend FEC seminar	07/01/2021	
	916	Allen, Levi United Mine Workers of America Power PAC	\$9,000.00	07/31/2020	\$9,000.00	09/02/2020	\$0.00	Develop a FEC Compliance Manual	08/31/2020	09/17/2020
	917	Ruppert, Jeffrey A. Elevate Ohio	\$1,955.00	07/31/2020	\$1,955.00	07/17/2020	\$0.00	Attend FEC seminar	07/01/2021	09/01/2020
	918	Engineers Political Education Committee (EPEC)/International Union of Operating Engineers Hickey, Brian E.	\$8,175.00	07/31/2020	\$8,175.00	07/30/2020	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	07/01/2021 09/29/2020	
	919	Mackey, Tim LIUNA Minnesota & North Dakota/Laborers' District Council of Minnesota & North Dakota	\$9,950.00	07/29/2020	\$9,950.00	08/13/2020	\$0.00	Develop a FEC Compliance Manual	06/29/2021	03/24/2021
	921	Scalise for Congress Ottenhoff, Benjamin	\$2,300.00	07/31/2020	\$2,300.00	07/24/2020	\$0.00	Attend FEC seminar	07/01/2021	
	922	Hudson, Gerald	\$12,100.00	07/31/2020	\$12,100.00	08/13/2020	\$0.00	Conduct internal education program for employees or staff	09/29/2020	10/08/2020

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		United We Can						Conduct internal education program for employees or staff	09/29/2020	10/08/2020
	923	Oklahoma Democratic Party Hunsucker, Rachael	\$19,450.00	08/14/2020	\$19,450.00	08/11/2020	\$0.00	Attend FEC seminar	01/15/2021	12/08/2020
								Develop RFAI tracking & response procedures	08/14/2020	07/31/2020
	924	Kallabat, Zinnia Working Michigan (SuperPac)	\$4,500.00	08/14/2020	\$4,500.00	08/06/2020	\$0.00	Attend FEC seminar	07/15/2021	09/02/2020
								Develop a FEC Compliance Manual	10/13/2020	09/26/2020
	925	Massachusetts Republican Party Andersen, Brent	\$5,450.00	08/02/2020	\$5,450.00	10/05/2020	\$0.00	Attend FEC seminar	07/03/2021	
	926	Campos Hernandez, Oriol Todos con Jennifer Inc. DBA Jennifer for Congress	\$5,900.00	07/31/2020	\$5,900.00	07/22/2020	\$0.00	Attend FEC seminar	07/21/2021	
	927	Michigan Republican Party (Registered Cmte) Meyers, Carl	\$37,500.00	07/31/2020	\$37,500.00	07/23/2020	\$0.00	Attend FEC seminar	07/01/2021	09/01/2020
	928	Deaglan McEachern for Congress Tiernan, Lori	\$3,450.00	08/05/2020	\$3,450.00	10/02/2020	\$0.00	Committee will file for termination	10/04/2020	10/15/2020
	929	Lux, Michael Fair and Balanced PAC	\$2,300.00	07/31/2020	\$2,300.00	08/03/2020	\$0.00	Attend FEC seminar	07/01/2021	
	930	Ramirez, Ronald Conservative Triumph Fund	\$2,150.00	07/31/2020	\$2,150.00	12/17/2019	\$0.00	Attend FEC seminar	07/01/2021	06/24/2020
								Develop a FEC Compliance Manual	09/29/2020	
	931	Patients for Affordable Drugs Action Wakana, Benjamin L.	\$6,950.00	07/31/2020	\$6,950.00	07/24/2020	\$0.00	Attend FEC seminar	07/01/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	932	Stoltz, Gail For Our Future	\$2,475.00	07/31/2020	\$2,475.00	08/03/2020	\$0.00	Attend FEC seminar	07/01/2021	
	933	New Jersey Republican State Committee Bengivenga, April	\$5,030.00	07/31/2020	\$5,030.00	09/02/2020	\$0.00	Attend FEC seminar Develop RFAI tracking & response procedures	01/01/2021 07/31/2020	11/19/2020 07/31/2020
	934	Oklahoma Democratic Party Hunsucker, Rachael	\$0.00	07/15/2020				Not Applicable	07/15/2020	12/08/2020
	936	Svoboda, Brian G. Morris, Cindy	\$2,900.00	07/31/2020	\$2,900.00	07/31/2020	\$0.00	Attend FEC seminar	07/01/2021	
	937	Planned Parenthood Votes Barrow-Klein, Vickie	\$4,000.00	07/31/2020	\$4,000.00	08/14/2020	\$0.00	Conduct internal education program for employees or staff	07/01/2021	
	938	Massachusetts Democratic State Committee Yorkis, Paul G.	\$5,550.00	07/31/2020	\$5,550.00	09/14/2020	\$0.00	Attend FEC seminar Develop RFAI tracking & response procedures	01/03/2021 07/31/2020	12/09/2020 07/31/2020
	939	Kahn, Michael Association For Firefighters PAC DBA Association for Firefighters	\$3,850.00	07/31/2020				Attend FEC seminar Develop RFAI tracking & response procedures	07/01/2021 07/31/2020	 07/31/2020
	940	Terry, David Texans for Texas	\$3,175.00	08/02/2020	\$3,175.00	07/24/2020	\$0.00	Committee will file for termination	10/01/2020	07/24/2020
	942	Fight for Tomorrow Mackowiak, Matt L.	\$2,250.00	11/28/2020	\$2,250.00	11/18/2020	\$0.00	Attend FEC seminar	07/01/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
								Develop a FEC Compliance Manual	09/29/2020	
	944	One Nation United Crevecœur-Macphail, Desiree	\$21,675.00	07/21/2021				Attend FEC seminar	07/21/2021	
								Conduct & certify internal audit/reconciliation	07/21/2021	
									07/21/2022	
								Develop a FEC Compliance Manual	10/21/2020	
	946	Utah State Democratic Committee Srivastava, Sheila	\$5,310.00	07/31/2020	\$5,310.00	06/29/2020	\$0.00	Attend FEC seminar	01/04/2021	11/20/2020
								Develop RFAI tracking & response procedures	07/31/2020	07/31/2020
	947	Build the Wave Lerner, Nathan	\$4,125.00	05/03/2021	\$4,125.00	12/07/2020	\$0.00	Attend FEC seminar	08/06/2021	
								Develop a FEC Compliance Manual	11/04/2020	
	948	Human Rights Campaign Equality Votes Rinefierd, James M.	\$2,350.00	07/31/2020	\$2,350.00	08/19/2020	\$0.00	Attend FEC seminar	07/01/2021	
								Develop a FEC Compliance Manual	09/29/2020	09/29/2020
	949	Bayer U.S. LLC Political Action Committee Branca, Brian	\$6,250.00	09/05/2020	\$6,250.00	08/24/2020	\$0.00	Attend FEC seminar	08/06/2021	
								Conduct internal education program for employees or staff	11/04/2020	10/06/2020
								Develop a FEC Compliance Manual	11/04/2020	10/06/2020
	950	Arizona Republican Party Lettieri, Bob	\$3,900.00	07/31/2020	\$3,900.00	09/02/2020	\$0.00	Adopt and distribute policy regarding contributions to federal elections	07/31/2020	02/03/2020
	952	CASA in Action PAC	\$13,500.00	07/31/2020	\$13,500.00	09/02/2020	\$0.00	Attend FEC seminar	07/01/2021	

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
		Guzman, Melissa						Attend FEC seminar Conduct & certify internal audit/reconciliation Develop a FEC Compliance Manual	07/01/2021 07/31/2020 09/29/2020	
	953	Hotel Workers for Stronger Communities	\$2,900.00	07/31/2020	\$2,900.00	08/12/2020	\$0.00	Attend FEC seminar Other	07/01/2021 07/31/2020	08/28/2020
	954	Kutac, Paul Americans for Police and Trooper Safety	\$3,000.00	07/31/2020	\$3,000.00	08/20/2020	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	07/01/2021 09/29/2020	01/14/2021 09/29/2020
	956	Zucker, Jonathan It Starts Today	\$5,450.00	07/31/2020	\$5,450.00	08/03/2020	\$0.00	Attend FEC seminar Conduct & certify internal audit/reconciliation Develop a FEC Compliance Manual	07/01/2021 07/01/2021 09/29/2020	03/03/2021 09/29/2020
Sub-Total : FY -2020			\$241,345.00		\$215,820.00		\$0.00			
FY -2021	920	Pulaski, Art Million More Voters, Sponsored by the California Labor Federation, AFL-CIO	\$5,450.00	05/15/2021				Committee will file for termination	07/14/2021	
	955	Varban, Alex Americans for Prosperity Action, Inc.(AFP Action)	\$18,350.00	02/18/2021	\$18,350.00	02/09/2021	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	01/19/2022 04/19/2021	04/21/2021 03/08/2021
	960	Campbell, Tom Tom Campbell for North Dakota	\$2,250.00	12/31/2020	\$2,250.00	02/09/2021	\$0.00	Committee will file for termination	02/28/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	961	DNC Services Corp / Democratic National Committee Derrough, William Q.	\$10,500.00	02/18/2021	\$10,500.00	01/28/2021	\$0.00	Attend FEC seminar	01/19/2022	
	963	Communities for a New California C4	\$6,400.00	01/14/2022	\$1,650.00	04/14/2021	\$4,750.00	Attend FEC seminar Other	01/19/2022 02/18/2021	 02/17/2021
	964	Case Action Fund	\$6,650.00	10/14/2020	\$6,650.00	10/14/2020	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	01/24/2022 04/26/2021	05/27/2021 04/12/2021
	965	VoteVets.org Action Fund	\$6,250.00	02/25/2021	\$6,250.00	02/10/2021	\$0.00	Attend FEC seminar	01/24/2022	
	966	Credit Suisse Securities (USA) LLC PAC Guarin, Cecilia	\$1,625.00	06/14/2021				Attend FEC seminar Other	04/15/2022 06/14/2021	
	967	Marston, Christopher M. Liberty for Us Super PAC	\$17,400.00	10/12/2021				Attend FEC seminar Conduct & certify internal audit/reconciliation Develop a FEC Compliance Manual	04/15/2022 05/15/2022 07/14/2021	
	968	Friends of John Delaney Nordberg, Edward P.	\$5,000.00	02/18/2021	\$5,000.00	01/26/2021	\$0.00	Attend FEC seminar	01/19/2022	
	970	The 2016 Committee Saracino, William	\$10,000.00	03/20/2021	\$10,000.00	03/05/2021	\$0.00	File amended reports	03/20/2021	03/03/2021
	972	Canegata, John M. VIGOP (Virgin Islands Republican Party)	\$2,445.00	03/16/2021	\$2,445.00	03/15/2021	\$0.00	Adopt and distribute policy regarding contributions to federal elections Develop a FEC Compliance Manual	03/16/2021 05/17/2021	
	973	Phillips, Robert	\$1,900.00	02/18/2021	\$1,900.00	10/05/2020	\$0.00	Attend FEC seminar	01/19/2022	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		GRIT PAC						Attend FEC seminar Other	01/19/2022 02/18/2021	
	974	Kilgore, Paul SEAL PAC Supporting Electing American Leaders PAC	\$2,700.00	03/16/2021	\$2,700.00	03/11/2021	\$0.00	Adopt and maintain guidelines governing contributions to federal elections	02/16/2021	
	976	Free Forever Political Action Committee Krason, Patrick	\$5,500.00	03/18/2021				Attend FEC seminar Committee will file for termination	02/16/2022 05/17/2021	
	977	Perfect Together PAC, Inc. Mondella, Theresa	\$1,300.00	03/19/2021	\$1,300.00	04/07/2021	\$0.00	Committee will file for termination	04/17/2021	04/09/2021
	978	Kilgore, Paul Protect Freedom Political Action Committee	\$2,125.00	03/18/2021	\$2,125.00	04/08/2021	\$0.00	Attend FEC seminar	02/16/2022	
	981	ACTBLUE Hill, Erin	\$3,300.00	03/26/2021	\$3,300.00	03/18/2021	\$0.00	Conduct & certify internal audit/reconciliation Other	05/25/2021 03/26/2021	03/25/2021 03/25/2021
	984	Marston, Christopher M. American Values PAC	\$2,250.00	05/07/2021	\$2,250.00	04/16/2021	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	04/07/2022 07/06/2021	
	985	PROTECTING OUR VOTE PAC Woodard, Kimberly A.	\$3,650.00	05/14/2021				Conduct internal education program for employees or staff Other	07/13/2021 05/14/2021	
	986	Democratic Progress	\$4,600.00	05/07/2021	\$4,600.00	04/20/2021	\$0.00	Attend FEC seminar	07/06/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		Carson, Jeffrey						Attend FEC seminar Develop a FEC Compliance Manual	07/06/2021 04/07/2022	
	987	Guernsey, Sherwood RURAL FREEDOM NETWORK	\$2,275.00	04/24/2021	\$2,275.00	03/31/2021	\$0.00	Conduct internal education program for employees or staff	06/23/2021	
	992	Midwest Victory PAC Mauro, Nick J.	\$1,375.00	04/23/2021	\$1,375.00	04/12/2021	\$0.00	Committee will file for termination		
Sub-Total : FY -2021			\$123,295.00		\$84,920.00		\$4,750.00			
Grand Total :			\$364,640.00		\$300,740.00		\$4,750.00			



AF Performance Goals

Print Date: April 30, 2021

Selected Parameters:

Office: Both

Start Date: 10/01/2020

End Date: 03/31/2021

*Exception: YES



AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date
Processed					
2020	YE	H_S_P_UNAUTH	N	01/31/2021	03/31/2021
2020	M12	P_UNAUTH	N	12/20/2020	02/17/2021
2020	30G	UNAUTH	N	12/03/2020	03/17/2021
2020	30G	AUTH	N	12/03/2020	01/22/2021
2020	M11	P_UNAUTH	N	11/20/2020	01/19/2021
2020	12G	UNAUTH_Q	Y	10/22/2020	03/02/2021
2020	12G	AUTH	Y	10/22/2020	12/14/2020
2020	12G	UNAUTH_M	Y	10/22/2020	12/14/2020
2020	M10	P_UNAUTH	N	10/20/2020	12/10/2020
2020	M10	P_UNAUTH	Y	10/20/2020	12/10/2020
2020	Q3	H_S_P_UNAUTH	N	10/15/2020	12/10/2020
2020	Q3	H_S_P_UNAUTH	Y	10/15/2020	12/03/2020
2020	M9	P_UNAUTH	N	09/20/2020	11/16/2020
2020	12P	AUTH	Y	08/27/2020	10/13/2020
2020	M8	P_UNAUTH	N	08/20/2020	10/13/2020

Total AF Reports Processed 15

Average Processing Days 62.27

Percentage to Goal 86.67%

Processed - No committees

					Action Date
2020	30GR	AUTH	N	01/04/2021	02/17/2021
2020	30SGR	AUTH	N	12/31/2020	02/17/2021
2020	30GR	AUTH	N	12/17/2020	02/12/2021
2020	30SG	AUTH	N	12/03/2020	01/22/2021
2020	12GR	AUTH	Y	11/23/2020	01/19/2021
2020	12SGR	AUTH	Y	11/19/2020	12/22/2020
2020	12GR	AUTH	Y	11/05/2020	12/14/2020
2020	30SG	AUTH	N	10/29/2020	12/14/2020



AF Performance Goals

(Confidential and Sensitive)

Processed - No committees

Action Date

(b) (7)(E)

2020	12SG	AUTH	Y	10/22/2020	12/10/2020
2020	12SG	AUTH	Y	09/17/2020	10/20/2020
2020	12P	AUTH	Y	09/03/2020	10/13/2020
2020	12P	AUTH	Y	08/20/2020	10/13/2020
2021	12GR	AUTH	Y	12/24/2020	02/17/2021
2021	12SGR	AUTH	Y	12/24/2020	02/17/2021

Total AF Reports Processed-No Committees 14

Average Processing Days 47.14

(b) (7)(E)

Percentage to Goal 100.00%

Total AF Reports 29

Average Processing Days 54.97

(b) (7)(E)

Percentage to Goal 93.10%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters

RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters

processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2019	MY	3748	C00634964	08/07/2020	10/06/2020	60	Y
2019	M8	3749	C00008409	09/24/2020	11/23/2020	60	Y
2019	Q3	3758	C00615013	09/08/2020	11/06/2020	59	Y
2019	YE	3776	C00634964	08/07/2020	10/06/2020	60	Y
2019	YE	3778	C00615013	09/08/2020	11/06/2020	59	Y
2019	YE	3780	C00426569	08/25/2020	10/23/2020	59	Y
2020	12P	3789	C00676320	08/20/2020	10/19/2020	60	Y
2020	Q1	3816	C00691709	09/17/2020	11/13/2020	57	Y
2020	Q1	3823	C00634964	08/07/2020	10/06/2020	60	Y
2020	Q1	3826	C00615013	09/08/2020	11/06/2020	59	Y
2020	Q1	3827	C00638148	08/08/2020	10/07/2020	60	Y
2020	Q1	3829	C00725994	11/05/2020	01/04/2021	60	Y
2020	Q1	3831	C00676320	08/20/2020	10/19/2020	60	Y
2020	12P	3834	C00154625	08/17/2020	10/16/2020	60	Y
2020	Q2	3904	C00676320	02/10/2021	03/31/2021	49	Y

Total Challenges Processed 15

Average Processing Days 58.80

Total Reports Processed within 60 Days 15

Percentage to Goal 100.00%



AF Performance Goals

(Confidential and Sensitive)

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

Administrative Fine Program
Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (3/31/21)
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$131,164	\$318,495	\$522,874	\$320,902

(b) (7)(E)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

AGENDA DOCUMENT NO. X21-24
AGENDA ITEM
For meeting of August 10, 2021

July 30, 2021

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista J. Roche *KJR*
Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Dayna C. Brown *DCB*
Assistant Staff Director
Audit Division

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2021 – 3rd Quarter Highlights (4/1/21 – 6/30/21)

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the third quarter of FY 2021 (4/1/21 – 6/30/21). The intent of this document is to provide an update of the workload and achieved results of the Office of Compliance on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during an upcoming Executive Session.

The attached **Appendix A** provides the Commission with third quarter highlights for each office and a statistical overview of FY 2021 results and progression towards meeting the goals

outlined within the 2018-2022 Strategic Plan adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled ‘Proposed Final Audit Report – Due Date’ which highlights the report manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2021 statistics for meeting strategic performance goals related to the Administrative Fine Program. **Appendix F** (AF Penalties Assessed and Collected) shows the total amount of penalties assessed and collection rate for FY 2015 – 2021.

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the document.

Alternative Dispute Resolution Office (ADRO)

In the third quarter of FY 2021, the ADRO received 31 cases including 27 from the Reports Analysis Division (RAD), 3 from Audit, and 1 directly from the Commission. During this time period, the ADRO closed 17 matters – 16 approved Negotiated Settlements and 1 approved dismissal. The Commission assessed \$65,215 in civil penalties and collected \$56,770 during the quarter.

(b) (7)(E)

There are currently 6 matters pending with the Commission for a vote.

In the third quarter of FY 2021, ADRO focused on improving our efficiency while processing a record number of incoming matters – a nearly 250% increase over the same quarter in the previous election cycle. Staff continued to work with OCIO to implement enhancements to its case management systems, ensuring that Law Manager functions to automate drafts of our case processing documents including memos, correspondence, settlements, and recommendations. Further, ADRO continued to develop and implement a custom case tracking application to manage day-to-day details of our workflow and automate reports. ADRO will work closely with OCIO in the coming quarter to ensure that data can be transferred from Law Manager to our new database to improve the efficiency of our data entry and ensure accuracy.

The ADRO filled a GS-13 ADR Specialist position internally. During the quarter, an ADRO staff member continued to serve on the Engagement Steering Committee and the Diversity, Equity, and Inclusion Council.

Administrative Fine Program (Office of Administrative Review)

During the third quarter of FY 2021, the Commission processed 114 Reason to Believe (RTB) findings. OAR received challenges in 11 cases and processed 23 Reviewing Officer Recommendations (RORs). The Commission reviewed final determination recommendations in 40 cases, made a final determination that the respondents in 38 cases violated

52 U.S.C. § 30104(a), and assessed \$130,084 in civil penalties. The Commission also collected \$114,820 in fine payments and prepared 39 cases for public release.

(b) (7)(E)

Additionally, OAR forwarded 95.6% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

In the third quarter, the Reviewing Officer also continued to work with OCIO to develop and test the new Administrative Fines search system for the website. This new search feature will go live in August 2021 and replace the current Administrative Fines search within the Enforcement Query System.

Audit Division (Audit)

During the third quarter of FY 2021, the Audit Division (Audit) processed the following audit reports:

	Audit Report Stage	Number of Reports
Approved by Commission	Final Audit Report	3
Sent to the Committee	Interim Audit Report	5
	Draft Final Audit Report	0
Circulated to Commission	Interim Audit Report (<i>informational and no-objection basis</i>)	6
	Audit Division Recommendation Memorandum	0
	Proposed Final Audit Report	2
Forwarded to OGC	Interim Audit Report	3
	Draft Final Audit Report	0
	Audit Division Recommendation Memorandum	0
	Total # of Audit Reports	19

As of the date of this memorandum, Audit has a total of 16 open audits, including one 2018 authorized committee audit; nine 2018 unauthorized committee audits; and six 2020 authorized committee audits, approved by the Commission in this third quarter. Pre-audit reviews are underway for the 2020 audits, with fieldwork expected to begin in early September.

For the 2018 cycle authorized committee audits, during the third quarter the Commission approved one Proposed Final Audit Report and the Audit staff referred to the Alternative Dispute Resolution Office (ADRO) one committee with Commission-approved findings that breached materiality thresholds for referral. (b) (5), (b) (7)(A)

(b) (5), (b) (7)(A)

The committee has since provided its response to the Interim Audit Report and the Audit staff is finalizing the Draft Final Audit Report for legal analysis by the Office of General Counsel's Compliance Advice Team (OGC-CAT). (b) (5)

Regarding the 2018 unauthorized committee audits, in the third quarter the Commission approved one Proposed Final Audit Report and five Interim Audit Reports, and the Audit staff referred to ADRO two committees with Commission-approved findings that breached materiality thresholds for referral. Additionally, the nine open audits are in the following stages: three are in the committee response period to the Interim Audit Report; four are in the Draft Final Audit Report writing stage; and three are currently with OGC-CAT for legal analysis.

(b) (7) (E)

With respect to the Presidential Election Campaign Fund (PECF), Audit forwarded three 508 accessibility compliant monthly PECF reports received from the U.S. Treasury, to the Office of Chief Information Officer (OCIO) for web placement. In addition, Audit was contacted by the U.S. Treasury liaison and answered questions pertaining to the 2020 presidential election spending limits. In consultation with OGC-CAT, Audit also provided comments and edits to the Information Division and OCIO on the new web pages for presidential candidates and matching funds.

(b) (5)

During the third quarter, Audit provided assistance to ADRO on one matter and assisted OGC on three matters. Audit staff also prepared and delivered a presentation to OGC detailing the who, what, when and why of the Audit Division, its processes and the types of violations most often referred to OGC. Additionally, Audit held monthly Division meetings during the quarter which included training on Time Management techniques, how to conduct Records Inventory, and changes resulting from the 2019-2020 Title 52 Authorized Audit Program, Materiality Thresholds and Error Definitions, which were approved by the Commission in April. The 2019-2020 Title 52 Unauthorized Audit Program, Materiality Thresholds and Error Definitions were recently emailed to the Commission for comments and questions prior to being formally circulated for vote.

Audit Management and OGC-CAT met with Commission offices to discuss the audit process as it exists currently in Directive 70 and potential changes Commissioners would like to see to the process and audit reports. Subsequent to those meetings, Audit Management and OGC-CAT have met to brainstorm ideas that may find consensus among the Commissioners and are preparing proposed modification options for the Commission's informal consideration.

Audit staff received new laptops, courtesy of OCIO in April and successfully upgraded to TeamMate version 12.6. Audit management also collaborated with OCIO to implement the use of SharePoint as a secure means of receiving electronic documents from committees, which has been instrumental in receiving records for the 2020 authorized committee audits. Additionally, Audit collaborated with OCIO with respect to User Acceptance Testing on migration to Amazon Web Services (AWS) for TeamMate 12.6, as well as the Download Application, Audit Report Search System, Audit Status Database and Coding Database. All migrations to-date have been successful. Crystal Reports and the Audit Sampling Program are scheduled to migrate to AWS in early August.

The Audit Division currently has 9 Auditor vacancies, equivalent to approximately 1/3 of our Auditor staff, and recently received approval to fill one of these vacancies. The posting is scheduled to open on July 30th. Thus far this fiscal year, two Auditors have retired and this trend is expected to continue as another Auditor will retire in December 2021, and three additional Auditors are eligible and making arrangements to retire between now and FY 2024. This shortage

will continue to be exacerbated as Auditors retire and/or separate from the agency and as this occurs, we will continue to seek Commission approval to backfill vacancies.

Reports Analysis Division (RAD)

During the third quarter of FY 2021, RAD staff wrapped up the 2019-2020 cycle review and made audit referral assessments for Unauthorized committees, referring 12 committees (2 Party, 10 PACs) to the Audit Division during the fourth quarter. In addition, the RAD Education Program (the Program) was implemented for the first time which provides an informal, education-based means for resolving compliance issues. The goal of the program is to educate political committees on disclosure and compliance requirements to ensure future compliance with the FECA and Commission regulations. The Program provides eligible committees with an opportunity to participate in tailored training focused on the issues identified during the review of the committees' reports and cited in Requests for Additional Information sent during the election cycle, in lieu of a referral for an audit. Further, committees that are not otherwise eligible for an audit referral, but that meet certain criteria outlined in the RAD Procedures, are invited to participate in the Program to prevent future compliance issues. For the 2019-2020 cycle, 14 committees have been identified thus far as eligible to participate in the Program and all 14 have agreed to participate. Further, training sessions have been completed for four of the committees and are in the process of being scheduled for the remaining 10. Feedback received so far from the committees that have attended the training sessions has been positive and indicates that attendees are appreciative and found the sessions to be very helpful. Also, during the third quarter, Reports Processing Branch staff continued to report to the building on a weekly basis to process paper documents, ensuring they were made publicly available timely and that the 48-hour statutory requirement was met.

During the third quarter, RAD staff reviewed a total of 17,977 documents totaling 12,070,517 pages and 77% of the reports were reviewed within 90 days of receipt, exceeding the strategic goal of 75% of reports reviewed within 90 days of receipt. RAD generated and sent 1,519 letters to the filing community and 92% of RFAIs were sent within 40 days of the report review date. Also, during the third quarter, RAD generated 33 referrals (27 ADRO, 4 OGC, 2 Administrative Fine) and sent 607 non-filer notices. In addition, RAD staff handled 2,720 phone calls and 196 emails from the filing community. The Reports Processing Branch coded 6,731,027 transactions, 616 documents and processed 13,543 pages from 1,378 documents in the Paper Conversion system. Also, the 2021-2022 Redacted RAD Review & Referral Procedures were approved by the Commission and posted on the FEC website.

RAD staff was active in providing training, outreach and assistance during the third quarter, collaborating with the Information Division on Candidate Committee, Party, Trade PAC and FECfile webinars. Further, RAD staff conducted an OnTopic training session on Registration for Campaigns, as well as two FEC Connect training sessions for ADR cases. RAD staff also reviewed and commented on Record articles covering the Ohio-11 and New Mexico-01 Special elections. In addition, RAD staff assisted the Press Office with the vetting of the 24-month statistical summary and collaborated with the Electronic Filing Office to facilitate the 2021 April Quarterly, April Monthly and May Monthly reporting reminders for electronic filers. RAD staff also provided extended phone coverage for the 2021 April Quarterly filing deadline. In the area of assistance provided to other offices, RAD assisted OGC with 28 matters, ADRO with 14 matters,

the Audit Division with 11 matters, the Press Office with 7 matters, and responded to 20 inquiries from Commission offices. In addition, a RAD overview was provided to Commissioner EAs, as well as side-by-side review sessions.

RAD management continued its commitment to providing consistent communication, as well as learning and team building opportunities to staff members in the Office of Compliance. During the third quarter, Office Overview sessions were held covering the Administrative Fine Program and with the Office of Congressional Affairs and OGC – Policy Division. These sessions allowed staff to learn about the functions and responsibilities of other offices within the agency. RAD management also continued to provide a monthly newsletter to staff which includes FEC and RAD news, as well as employee recognition and spotlight features. Also, a division meeting was held which included updates on agency projects and division customer service initiatives, performance and peer award presentations, and a team building activity. During the next quarter we will be introducing a “Meet a Commissioner Event Series” which will enable staff to get to know Commissioners and submit topics for discussion.

In the area of personnel during third quarter, two Campaign Finance Analysts (CFA) transferred to OCFO and two CFAs were promoted to Senior Campaign Finance & Reviewing Analysts. We are currently in the process of filling a CFA position, two Data Disclosure Assistant positions and one Senior Campaign Finance & Reviewing Analyst position. (b) (7)(E)

Attachments

Appendix A, FY 2021 Highlights and FY Overview for Office of Compliance Goals

Appendix B, Open Audits Report

Appendix C, Proposed Final Audit Report – Due Date

Appendix D, ADR Civil Penalty Report

Appendix E, AF Performance Goals Report

Appendix F, AF Penalties Assessed and Collected

Status of Compliance

FY 2021
(10/1/2020 – 6/30/2021)

Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (6/30/21)
RAD to code and enter 95% of reports within 30 days of receipt	99.9%	95.9%	99.9%	94.1%	98.5%	87.1%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	99.1%	98.7%	99.0%	99.9%	99.8%	99.9%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%	100%

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2020 Performance Goals	Status 6/30/21
RAD staff provided extended phone coverage from 5:30pm to 8:00pm for the 2021 April Quarterly reporting deadline.	RAD staff handled 15 calls between 5:30pm and 8:00pm for the 2021 April Quarterly filing deadline and handled a total of 133 calls.
RAD staff collaborated with the Information Division on the following webinars: Candidate Committee (2), Party Committee, Trade PAC, and FECfile.	Candidate Committee and Trade PAC webinars were held in April 2021, Party Committee, Candidate Committee and FECfile webinars were held in June 2021.
RAD implemented the RAD Education Program for the 2020 cycle to provide an informal, education-based means for resolving compliance issues, in lieu of an audit in some cases. Eligible committees have an opportunity to participate in tailored training focused on the issues identified during the review of the committees' reports.	RAD staff identified 14 committees (4 Candidate Committees, 6 PACs, 4 Party Committees) thus far as eligible to participate in the RAD Education Program. All 14 Committees agreed to participate. Training sessions were held for all 4 Candidate Committees and are in the process of being scheduled for the PACs and Party Committees.

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 2: Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs

Performance Goals	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21
RAD to review 75% of reports within 90 days of receipt	92.9%	76.6%	92.2%	76%	91.9%	86.2%
RAD to send 75% of RFAs within 40 days of report review	92%	88%	88%	85%	86%	92%
(b) (7)(E)	100%	96.2%	96.9%	88%	100%	95.2%
	56%	25%	45%	100%	N/A	83%
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	81.8%	96.67%	100%	97%	100%	97%
(b) (7)(E)	100%	100%	99%	100%	100%	100%

1 - No PFARs were circulated this quarter.

Strategic Objective 4: Foster a Culture of High Performance

Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (6/30/21)
RAD	Documents/ Transactions Coded	53,107/ 19,385,479	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828	4,873/ 63,983,177	3,715/ 123,987,343
	Documents/Pages Processed in Paper Automation/ Conversion System	N/A	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417	1,771/ 18,028	2,563/ 24,323
	Documents/Pages Reviewed	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699	89,525/ 73,526,421	82,337/ 173,740,513
	Letters sent	13,253	14,796	13,763	12,562	13,838	12,319
	Telephone calls handled	12,362	11,634	13,036	13,149	13,209	10,671
	Email inquiries handled	N/A	N/A	396	658	894	716
	Referrals	43	95	46	82	34	69
	AF Cases RTB/FD	83/33	163/168	95/23	262/93	100/204	358/99
Audit	(b) (7)(E)						
ADRO							
OAR	Cases Received	12	29	8	37	20	31
	Cases Closed (FD)	11	32	10	36	2	32



Open Audits

As of 7/29/2021

(Confidential and Sensitive)

<u>Date of Last Action</u>	<u>Audit Manager</u>	<u>Report Track</u>
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Pre-Audit

(b) (3) (A)

Total - 6

Interim/Preliminary Audit Report Committee Response Period

(b) (3) (A)

Total - 3

Draft Final Audit Report Writing

2018 MIKE BRAUN FOR INDIANA	C00653147	06/07/2021	Morcomb	B
2018 CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE	C00167320	06/22/2021	Pacious	B
2018 REPUBLICAN PARTY OF MINNESOTA - FEDERAL	C00001313	06/24/2021	Morcomb	B
2018 THE UTE PAC	C00626671	07/12/2021	Morcomb	B

Total - 4

Audits in OGC

(b) (3) (A)

2018 DEMOCRACY ENGINE, INC., PAC	C00468314	DFAR	07/01/2021	Burgess	B
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Total - 3



Open Audits

As of 7/29/2021

(Confidential and Sensitive)

16 Open Audits

Legend

Track B

Audits with findings

Track C

Audits with no findings

IAR

Interim Audit Report

PAR

Preliminary Audit Report

ADRM

Audit Division Recommendation Memorandum

PFAR

Proposed Final Audit Report

Text

If text is red, the report has not been sent to OGC for a legal analysis



Open Audits

As of 7/29/2021
(Confidential and Sensitive)

Audit Caseload

Audit Manager	Number of Audits	Percent of Total Audits ¹
Burgess	3	19%
Morcomb	4	25%
Pacious	4	25%
Smith	3	19%
Yarbrough	2	13%
Totals	16	100%

¹ May not total 100% due to rounding



Open Audits

As of 7/29/2021

(Confidential and Sensitive)

Comments

2018

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)

Connecticut Democratic State Central Committee
(b) (5)

Democracy Engine PAC
(b) (5)

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)

Mike Braun for Indiana
(b) (5)

Republican Party of Minnesota - Federal
(b) (5)

The UTE PAC
(b) (5)

(b) (3) (A)
(b) (5)

2020

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)



Proposed Final Audit Report - Due Date

As of 7/29/2021

(Confidential and Sensitive)

		<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2018	MIKE BRAUN FOR INDIANA	Lmorcomb	DFAR	Report Writing	04/25/2019
2018	DEMOCRACY ENGINE. INC.. PAC	Burdess	DFAR	OGC Reviewing	10/02/2019

(b) (7)(E)

(b) (3) (A)

2018	REPUBLICAN PARTY OF MINNESOTA - FEDERAL	Lmorcomb	DFAR	Report Writing	10/02/2019
2018	CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE	Pacious	DFAR	Report Writing	10/02/2019

(b) (3) (A)

2018	THE UTE PAC	Lmorcomb	DFAR	Report Writing	10/02/2019
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(b) (3) (A)



Proposed Final Audit Report - Due Date

As of 7/29/2021

(Confidential and Sensitive)

16 Open Audits

Legend

IAR	Interim Audit Report
PAR	Preliminary Audit Report
DFAR	Draft Final Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year: 10/01/2019 To: 09/30/2021

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY -2020	912	North Dakota Republican Party Hacker, Nicholas P.	\$8,000.00	07/25/2020	\$8,000.00	08/11/2020	\$0.00	Develop a FEC Compliance Manual	08/24/2020	08/24/2020
	914	Idaho State Democratic Party Hayes, LeRoy	\$4,525.00	07/31/2020	\$4,525.00	07/27/2020	\$0.00	Attend FEC seminar	07/01/2021	06/21/2021
	916	Allen, Levi United Mine Workers of America Power PAC	\$9,000.00	07/31/2020	\$9,000.00	09/02/2020	\$0.00	Develop a FEC Compliance Manual	08/31/2020	09/17/2020
	917	Ruppert, Jeffrey A. Elevate Ohio	\$1,955.00	07/31/2020	\$1,955.00	07/17/2020	\$0.00	Attend FEC seminar	07/01/2021	09/01/2020
	918	Engineers Political Education Committee (EPEC)/International Union of Operating Engineers Hickey, Brian E.	\$8,175.00	07/31/2020	\$8,175.00	07/30/2020	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	07/01/2021 09/29/2020	08/17/2021 07/07/2021
	919	Mackey, Tim LIUNA Minnesota & North Dakota/Laborers' District Council of Minnesota & North Dakota	\$9,950.00	07/29/2020	\$9,950.00	08/13/2020	\$0.00	Attend FEC seminar	06/29/2021	03/24/2021
	921	Scalise for Congress Ottenhoff, Benjamin	\$2,300.00	07/31/2020	\$2,300.00	07/24/2020	\$0.00	Attend FEC seminar	07/01/2021	
	922	Hudson, Gerald	\$12,100.00	07/31/2020	\$12,100.00	08/13/2020	\$0.00	Conduct internal education program for employees or staff	09/29/2020	10/08/2020

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		United We Can						Conduct internal education program for employees or staff	09/29/2020	10/08/2020
	923	Oklahoma Democratic Party Hunsucker, Rachael	\$19,450.00	08/14/2020	\$19,450.00	08/11/2020	\$0.00	Attend FEC seminar	01/15/2021	12/08/2020
								Develop RFAI tracking & response procedures	08/14/2020	07/31/2020
	924	Kallabat, Zinnia Working Michigan (SuperPac)	\$4,500.00	08/14/2020	\$4,500.00	08/06/2020	\$0.00	Attend FEC seminar	07/15/2021	09/02/2020
								Develop a FEC Compliance Manual	10/13/2020	09/26/2020
	925	Massachusetts Republican Party Andersen, Brent	\$5,450.00	08/02/2020	\$5,450.00	10/05/2020	\$0.00	Attend FEC seminar	07/03/2021	07/14/2021
	926	Campos Hernandez, Oriol Todos con Jennifer Inc. DBA Jennifer for Congress	\$5,900.00	07/31/2020	\$5,900.00	07/22/2020	\$0.00	Attend FEC seminar	07/21/2021	
	927	Michigan Republican Party (Registered Cmte) Meyers, Carl	\$37,500.00	07/31/2020	\$37,500.00	07/23/2020	\$0.00	Attend FEC seminar	07/01/2021	09/01/2020
	928	Deaglan McEachern for Congress Tiernan, Lori	\$3,450.00	08/05/2020	\$3,450.00	10/02/2020	\$0.00	Committee will file for termination	10/04/2020	10/15/2020
	929	Lux, Michael Fair and Balanced PAC	\$2,300.00	07/31/2020	\$2,300.00	08/03/2020	\$0.00	Attend FEC seminar	07/01/2021	
	930	Ramirez, Ronald Conservative Triumph Fund	\$2,150.00	07/31/2020	\$2,150.00	12/17/2019	\$0.00	Attend FEC seminar	07/01/2021	06/24/2020
								Develop a FEC Compliance Manual	09/29/2020	
	931	Patients for Affordable Drugs Action Wakana, Benjamin L.	\$6,950.00	07/31/2020	\$6,950.00	07/24/2020	\$0.00	Attend FEC seminar	07/01/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	932	Stoltz, Gail For Our Future	\$2,475.00	07/31/2020	\$2,475.00	08/03/2020	\$0.00	Attend FEC seminar	07/01/2021	
	933	New Jersey Republican State Committee Bengivenga, April	\$5,030.00	07/31/2020	\$5,030.00	09/02/2020	\$0.00	Attend FEC seminar Develop RFAI tracking & response procedures	01/01/2021 07/31/2020	11/19/2020 07/31/2020
	934	Oklahoma Democratic Party Hunsucker, Rachael	\$0.00	07/15/2020				Not Applicable	07/15/2020	12/08/2020
	936	Svoboda, Brian G. Morris, Cindy	\$2,900.00	07/31/2020	\$2,900.00	07/31/2020	\$0.00	Attend FEC seminar	07/01/2021	06/28/2021
	937	Planned Parenthood Votes Barrow-Klein, Vickie	\$4,000.00	07/31/2020	\$4,000.00	08/14/2020	\$0.00	Conduct internal education program for employees or staff	07/01/2021	03/08/2021
	938	Massachusetts Democratic State Committee Yorkis, Paul G.	\$5,550.00	07/31/2020	\$5,550.00	09/14/2020	\$0.00	Attend FEC seminar Develop RFAI tracking & response procedures	01/03/2021 07/31/2020	12/09/2020 07/31/2020
	939	Kahn, Michael Association For Firefighters PAC DBA Association for Firefighters	\$3,850.00	07/31/2020				Attend FEC seminar Develop RFAI tracking & response procedures	07/01/2021 07/31/2020	 07/31/2020
	940	Terry, David Texans for Texas	\$3,175.00	08/02/2020	\$3,175.00	07/24/2020	\$0.00	Committee will file for termination	10/01/2020	07/24/2020
	942	Fight for Tomorrow Mackowiak, Matt L.	\$2,250.00	11/28/2020	\$2,250.00	11/18/2020	\$0.00	Attend FEC seminar	07/01/2021	07/14/2021

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
								Develop a FEC Compliance Manual	09/29/2020	07/15/2021
	944	One Nation United Crevecœur-Macphail, Desiree	\$21,675.00	07/21/2021				Attend FEC seminar	07/21/2021	
								Conduct & certify internal audit/reconciliation	07/21/2021	
									07/21/2022	
								Develop a FEC Compliance Manual	10/21/2020	
	946	Utah State Democratic Committee Srivastava, Sheila	\$5,310.00	07/31/2020	\$5,310.00	06/29/2020	\$0.00	Attend FEC seminar	01/04/2021	11/20/2020
								Develop RFAI tracking & response procedures	07/31/2020	07/31/2020
	947	Build the Wave Lerner, Nathan	\$4,125.00	05/03/2021	\$4,125.00	12/07/2020	\$0.00	Attend FEC seminar	08/06/2021	
								Develop a FEC Compliance Manual	11/04/2020	
	948	Human Rights Campaign Equality Votes Rinefierd, James M.	\$2,350.00	07/31/2020	\$2,350.00	08/19/2020	\$0.00	Attend FEC seminar	07/01/2021	03/24/2021
								Develop a FEC Compliance Manual	09/29/2020	09/29/2020
	949	Bayer U.S. LLC Political Action Committee Branca, Brian	\$6,250.00	09/05/2020	\$6,250.00	08/24/2020	\$0.00	Attend FEC seminar	08/06/2021	
								Conduct internal education program for employees or staff	11/04/2020	10/06/2020
								Develop a FEC Compliance Manual	11/04/2020	10/06/2020
	950	Arizona Republican Party Lettieri, Bob	\$3,900.00	07/31/2020	\$3,900.00	09/02/2020	\$0.00	Adopt and distribute policy regarding contributions to federal elections	07/31/2020	02/03/2020
	952	CASA in Action PAC	\$13,500.00	07/31/2020	\$13,500.00	09/02/2020	\$0.00	Attend FEC seminar	07/01/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		Guzman, Melissa						Attend FEC seminar Conduct & certify internal audit/reconciliation Develop a FEC Compliance Manual	07/01/2021 07/31/2020 09/29/2020	
	953	Hotel Workers for Stronger Communities	\$2,900.00	07/31/2020	\$2,900.00	08/12/2020	\$0.00	Attend FEC seminar Other	07/01/2021 07/31/2020	03/24/2021 08/28/2020
	954	Kutac, Paul Americans for Police and Trooper Safety	\$3,000.00	07/31/2020	\$3,000.00	08/20/2020	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	07/01/2021 09/29/2020	01/14/2021 09/29/2020
	956	Zucker, Jonathan It Starts Today	\$5,450.00	07/31/2020	\$5,450.00	08/03/2020	\$0.00	Attend FEC seminar Conduct & certify internal audit/reconciliation Develop a FEC Compliance Manual	07/01/2021 07/01/2021 09/29/2020	03/03/2021 07/07/2021 09/29/2020
Sub-Total : FY -2020			\$241,345.00		\$215,820.00		\$0.00			
FY -2021	1014	JewsChoose4MoreYears Greenwald, Carol	\$3,000.00	08/13/2021	\$3,000.00	07/19/2021	\$0.00	Committee will file for termination	10/12/2021	07/19/2021
	920	Pulaski, Art Million More Voters, Sponsored by the California Labor Federation, AFL-CIO	\$5,450.00	05/15/2021	\$5,450.00	05/07/2021	\$0.00	Committee will file for termination	07/14/2021	06/02/2021
	943	Cramer, Thomas A. Democratic Advancement PAC	\$8,815.00	06/08/2022				Attend FEC seminar Develop RFAI tracking & response procedures File amended reports	06/05/2022 12/06/2021 12/06/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	955	Varban, Alex Americans for Prosperity Action, Inc.(AFP Action)	\$18,350.00	02/18/2021	\$18,350.00	02/09/2021	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	01/19/2022 04/19/2021	04/21/2021 03/08/2021
	957	Beto for Texas (FKA Beto O'Rourke for Congress Committee) Pulido, Gwendolyn L.	\$5,900.00	06/21/2021	\$5,900.00	06/03/2021	\$0.00	Committee will file for termination	08/21/2021	
	960	Campbell, Tom Tom Campbell for North Dakota	\$2,250.00	12/31/2020	\$2,250.00	02/09/2021	\$0.00	Committee will file for termination	02/28/2021	02/11/2021
	961	DNC Services Corp / Democratic National Committee Derrough, William Q.	\$10,500.00	02/18/2021	\$10,500.00	01/28/2021	\$0.00	Attend FEC seminar	01/19/2022	
	963	Communities for a New California C4	\$6,400.00	01/14/2022	\$3,300.00	07/09/2021	\$3,100.00	Attend FEC seminar Other	01/19/2022 02/18/2021	 02/17/2021
	964	Case Action Fund	\$6,650.00	10/14/2020	\$6,650.00	10/14/2020	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	01/24/2022 04/26/2021	05/27/2021 04/12/2021
	965	VoteVets.org Action Fund	\$6,250.00	02/25/2021	\$6,250.00	02/10/2021	\$0.00	Attend FEC seminar	01/24/2022	
	966	Credit Suisse Securities (USA) LLC PAC Guarin, Cecilia	\$1,625.00	06/14/2021	\$1,625.00	05/17/2021	\$0.00	Attend FEC seminar Other	04/15/2022 06/14/2021	01/05/2021 02/01/2021
	967	Marston, Christopher M. Liberty for Us Super PAC	\$17,400.00	10/12/2021	\$17,400.00	05/06/2021	\$0.00	Attend FEC seminar Conduct & certify internal audit/reconciliation Develop a FEC Compliance Manual	04/15/2022 05/15/2022 07/14/2021	07/14/2021 06/30/2021
	968	Friends of John Delaney	\$5,000.00	02/18/2021	\$5,000.00	01/26/2021	\$0.00	Attend FEC seminar	01/19/2022	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		Nordberg, Edward P.						Attend FEC seminar	01/19/2022	
	970	The 2016 Committee Saracino, William	\$10,000.00	03/20/2021	\$10,000.00	03/05/2021	\$0.00	File amended reports	03/20/2021	03/03/2021
	972	Canegata, John M. VIGOP (Virgin Islands Republican Party)	\$2,445.00	03/16/2021	\$2,445.00	03/15/2021	\$0.00	Adopt and distribute policy regarding contributions to federal elections Develop a FEC Compliance Manual	03/16/2021 05/17/2021	05/16/2021 05/16/2021
	973	Phillips, Robert GRIT PAC	\$1,900.00	02/18/2021	\$1,900.00	10/05/2020	\$0.00	Attend FEC seminar Other	01/19/2022 02/18/2021	07/14/2021 09/18/2020
	974	Kilgore, Paul SEAL PAC Supporting Electing American Leaders PAC	\$2,700.00	03/16/2021	\$2,700.00	03/11/2021	\$0.00	Adopt and maintain guidelines governing contributions to federal elections	02/16/2021	03/16/2021
	976	Free Forever Political Action Committee Krason, Patrick	\$5,500.00	03/18/2021				Attend FEC seminar Committee will file for termination	02/16/2022 05/17/2021	
	977	Perfect Together PAC, Inc. Mondella, Theresa	\$1,300.00	03/19/2021	\$1,300.00	04/07/2021	\$0.00	Committee will file for termination	04/17/2021	04/09/2021
	978	Kilgore, Paul Protect Freedom Political Action Committee	\$2,125.00	03/18/2021	\$2,125.00	04/08/2021	\$0.00	Attend FEC seminar	02/16/2022	
	981	ACTBLUE Hill, Erin	\$3,300.00	03/26/2021	\$3,300.00	03/18/2021	\$0.00	Conduct & certify internal audit/reconciliation	05/25/2021	03/25/2021

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
								Other	03/26/2021	03/25/2021
	984	Marston, Christopher M. American Values PAC	\$2,250.00	05/07/2021	\$2,250.00	04/16/2021	\$0.00	Attend FEC seminar	04/07/2022	03/24/2021
								Develop a FEC Compliance Manual	07/06/2021	06/30/2021
	985	PROTECTING OUR VOTE PAC Woodard, Kimberly A.	\$3,650.00	05/14/2021	\$3,650.00	05/13/2021	\$0.00	Conduct internal education program for employees or staff	07/13/2021	06/28/2021
								Other	05/14/2021	05/14/2021
	986	Democratic Progress Carson, Jeffrey	\$4,600.00	05/07/2021	\$4,600.00	04/20/2021	\$0.00	Attend FEC seminar	04/07/2022	
								Develop a FEC Compliance Manual	07/06/2021	06/15/2021
	987	Guernsey, Sherwood RURAL FREEDOM NETWORK	\$2,275.00	04/24/2021	\$2,275.00	03/31/2021	\$0.00	Conduct internal education program for employees or staff	06/23/2021	05/03/2021
	989	Hometown Values PAC Helgesen, Francis Xavier	\$2,700.00	07/08/2021	\$2,700.00	07/16/2021	\$0.00	Committee will file for termination		
	991	Leon County Democratic Executive Committee Carpenter, Kevin Richard	\$800.00	12/16/2021				Attend FEC seminar	06/16/2022	
								Designate Compliance Specialist	07/16/2021	07/12/2021
	992	Midwest Victory PAC Mauro, Nick J.	\$1,375.00	04/23/2021	\$1,375.00	04/12/2021	\$0.00	Committee will file for termination	04/27/2021	04/27/2021
	996	Glaze, Kayla Louisiana Legacy PAC	\$1,275.00	07/09/2021	\$1,275.00	07/09/2021	\$0.00	Attend FEC seminar	06/09/2022	
	997	VanWyhe, Kimberly Denali Leadership PAC	\$5,150.00	07/23/2021				Attend FEC seminar	06/23/2022	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
								Develop a FEC Compliance Manual	09/21/2021	
	998	Patriot's Fund Greenlee, Scott	\$5,600.00	07/09/2021	\$5,600.00	07/09/2021	\$0.00	Attend FEC seminar	06/09/2022	
								Develop a FEC Compliance Manual	09/07/2021	
Sub-Total : FY -2021			\$156,535.00		\$133,170.00		\$3,100.00			
Grand Total :			\$397,880.00		\$348,990.00		\$3,100.00			



AF Performance Goals

Print Date: July 29, 2021

Selected Parameters:

Office: Both

Start Date: 10/01/2020

End Date: 06/30/2021

*Exception: YES



AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date
Processed					
2020	YE	H_S_P_UNAUTH	N	01/31/2021	03/31/2021
2020	M12	P_UNAUTH	N	12/20/2020	02/17/2021
2020	30G	UNAUTH	N	12/03/2020	03/17/2021
2020	30G	AUTH	N	12/03/2020	01/22/2021
2020	M11	P_UNAUTH	N	11/20/2020	01/19/2021
2020	12G	UNAUTH_Q	Y	10/22/2020	03/02/2021
2020	12G	AUTH	Y	10/22/2020	12/14/2020
2020	12G	UNAUTH_M	Y	10/22/2020	12/14/2020
2020	M10	P_UNAUTH	N	10/20/2020	12/10/2020
2020	M10	P_UNAUTH	Y	10/20/2020	12/10/2020
2020	Q3	H_S_P_UNAUTH	N	10/15/2020	12/10/2020
2020	Q3	H_S_P_UNAUTH	Y	10/15/2020	12/03/2020
2020	M9	P_UNAUTH	N	09/20/2020	11/16/2020
2020	12P	AUTH	Y	08/27/2020	10/13/2020
2020	M8	P_UNAUTH	N	08/20/2020	10/13/2020
2021	M5	P_UNAUTH	N	05/20/2021	06/30/2021
2021	Q1	H_S_P	N	04/15/2021	06/02/2021
2021	M2	P_UNAUTH	N	02/20/2021	04/12/2021

Total AF Reports Processed 18

Average Processing Days 59.67

Percentage to Goal 88.89%

Processed - No committees

				Action Date
2020	30GR	AUTH	N	01/04/2021
2020	30SGR	AUTH	N	12/31/2020
2020	30GR	AUTH	N	12/17/2020
2020	30SG	AUTH	N	12/03/2020
2020	12GR	AUTH	Y	11/23/2020



AF Performance Goals

(Confidential and Sensitive)

Processed - No committees

Action Date

2020	12SGR	AUTH	Y	11/19/2020	12/22/2020
2020	12GR	AUTH	Y	11/05/2020	12/14/2020
2020	30SG	AUTH	N	10/29/2020	12/14/2020
2020	12SG	AUTH	Y	10/22/2020	12/10/2020
2020	12SG	AUTH	Y	09/17/2020	10/20/2020
2020	12P	AUTH	Y	09/03/2020	10/13/2020
2020	12P	AUTH	Y	08/20/2020	10/13/2020
2021	30SGR	AUTH	N	05/24/2021	06/30/2021
2021	12SG	AUTH	Y	05/20/2021	06/24/2021
2021	M4	P_UNAUTH	N	04/20/2021	06/03/2021
2021	12SG	AUTH	Y	04/19/2021	06/03/2021
2021	30SG	AUTH	N	04/19/2021	06/02/2021
2021	12SGR	AUTH	Y	04/12/2021	06/01/2021
2021	M3	P_UNAUTH	N	03/20/2021	04/29/2021
2021	12SG	AUTH	Y	03/08/2021	04/14/2021
2021	30GR	AUTH	N	02/04/2021	04/01/2021
2021	30SGR	AUTH	N	02/04/2021	04/01/2021
2021	12GR	AUTH	Y	12/24/2020	02/17/2021
2021	12SGR	AUTH	Y	12/24/2020	02/17/2021

(b) (7)(E)

Total AF Reports Processed-No Committees 24

Average Processing Days 46.00

(b) (7)(E)

Percentage to Goal 100.00%

Total AF Reports 42

Average Processing Days 51.86

(b) (7)(E)

Percentage to Goal 95.24%



AF Performance Goals

(Confidential and Sensitive)

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters

RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters

processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2019	MY	3748	C00634964	08/07/2020	10/06/2020	60	Y
2019	M8	3749	C00008409	09/24/2020	11/23/2020	60	Y
2019	Q3	3758	C00615013	09/08/2020	11/06/2020	59	Y
2019	YE	3776	C00634964	08/07/2020	10/06/2020	60	Y
2019	YE	3778	C00615013	09/08/2020	11/06/2020	59	Y
2019	YE	3780	C00426569	08/25/2020	10/23/2020	59	Y
2020	12P	3789	C00676320	08/20/2020	10/19/2020	60	Y
2020	Q1	3816	C00691709	09/17/2020	11/13/2020	57	Y
2020	Q1	3823	C00634964	08/07/2020	10/06/2020	60	Y
2020	Q1	3826	C00615013	09/08/2020	11/06/2020	59	Y
2020	Q1	3827	C00638148	08/08/2020	10/07/2020	60	Y
2020	Q1	3829	C00725994	11/05/2020	01/04/2021	60	Y
2020	Q1	3831	C00676320	08/20/2020	10/19/2020	60	Y
2020	12P	3834	C00154625	08/17/2020	10/16/2020	60	Y
2020	30SG	3848	C00718635	02/11/2021	04/01/2021	49	Y
2020	M6	3853	C00702324	02/16/2021	04/01/2021	44	Y
2020	Q2	3867	C00656033	04/29/2021	06/24/2021	56	Y
2020	Q2	3878	C00710608	02/17/2021	04/16/2021	58	Y
2020	Q2	3883	C00104455	03/18/2021	05/17/2021	60	Y
2020	Q2	3904	C00676320	02/10/2021	03/31/2021	49	Y
2020	M7	3908	C00702324	02/16/2021	04/01/2021	44	Y
2020	12P	3912	C00656033	04/29/2021	06/24/2021	56	Y
2020	12PR	3916	C00741397	03/09/2021	05/07/2021	59	Y
2020	M8	3919	C00702324	02/16/2021	04/01/2021	44	Y



AF Performance Goals

(Confidential and Sensitive)

2020	M9	3927	C00702324	02/16/2021	04/01/2021	44	Y
2020	Q3	3938	C00743146	02/17/2021	06/25/2021	128	N
2020	Q3	3941	C00710608	02/17/2021	04/16/2021	58	Y
2020	Q3	3944	C00303032	03/23/2021	05/21/2021	59	Y
2020	Q3	3955	C00708941	02/17/2021	04/15/2021	57	Y
2020	Q3	3957	C00656033	04/29/2021	06/24/2021	56	Y
2020	Q3	3962	C00735910	03/26/2021	05/20/2021	55	Y
2020	Q3	3971	C00715748	03/08/2021	05/07/2021	60	Y
2020	M10	4011	C00702324	02/16/2021	04/01/2021	44	Y
2020	12G	4015	C00702324	02/16/2021	04/01/2021	44	Y
2020	30G	4075	C00743146	04/27/2021	06/25/2021	59	Y
2020	30G	4086	C00556605	04/16/2021	06/15/2021	60	Y
2020	YE	4131	C00743146	04/27/2021	06/25/2021	59	Y
2020	YE	4181	C00103861	04/27/2021	06/21/2021	55	Y

Total Challenges Processed 38

Average Processing Days 57.63

Total Reports Processed within 60 Days 37

Percentage to Goal 97.37%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

Administrative Fine Program
Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 6/30/21)
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$131,164	\$318,495	\$522,874	\$450,986

(b) (7)(E)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

AGENDA DOCUMENT NO. X21-34

AGENDA ITEM

For meeting of November 9, 2021

October 29, 2021

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista Roche *KJR*
Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Dayna C. Brown *DCB*
Assistant Staff Director
Audit Division

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2021 – 4th Quarter Highlights (7/1/21 – 9/30/21)

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the fourth quarter of FY 2021 (7/1/21 – 9/30/21). The intent of this document is to provide an update of the workload and achieved results of the Office of Compliance on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during an upcoming Executive Session.

The attached **Appendix A** provides the Commission with fourth quarter highlights and a statistical overview of FY 2021 results and performance goals outlined within the 2018-2022

Strategic Plan adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled ‘Proposed Final Audit Report – Due Date’ which highlights the report manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2021 statistics for meeting strategic performance goals related to the Administrative Fine Program. **Appendix F** (AF Penalties Assessed and Collected) shows the total amount of penalties assessed and collection rate for FY 2015 – 2021.

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the document.

Alternative Dispute Resolution Office (ADRO)

In the fourth quarter of FY 2021, the ADRO received 12 cases including 10 from the Reports Analysis Division (RAD), 1 from the Office of General Counsel (OGC), and 1 directly from the Commission. During this time period, the ADRO closed 30 matters – all of them approved Negotiated Settlements. The Commission assessed \$158,505 in civil penalties and collected \$114,705 during the quarter.

During the fourth quarter, the ADRO circulated recommendations in 27 matters. (b) (7)(E)

There is currently 1 matter pending with the Commission for a vote.

Throughout FY 2021, ADRO focused on improving our efficiency while processing a near record number of incoming matters – almost double the prior fiscal year. Staff continued to work with OCIO to implement enhancements to its case management systems, ensuring that Law Manager functions to automate drafts of our case processing documents including memos, correspondence, settlements, and recommendations. Further, ADRO continued to develop and implement a custom case tracking application to manage day-to-day details of our workflow and automate reports. ADRO will work closely with OCIO in the coming quarter to ensure that data can be transferred from Law Manager to our new database to improve the efficiency of our data entry and ensure accuracy.

Administrative Fine Program (Office of Administrative Review)

During the fourth quarter of FY 2021, the Commission processed 25 Reason to Believe (RTB) findings. OAR received challenges in 3 cases and processed 6 Reviewing Officer Recommendations (RORs). The Commission reviewed final determination recommendations in 168 cases, made a final determination that the respondents in 163 cases violated 52 U.S.C. § 30104(a), and assessed \$498,833 in civil penalties. The Commission also collected \$88,226 in fine payments and prepared 78 cases for public release.

(b) (7)(E)

OAR forwarded 50% of RORs within 60 days of receipt of each challenge, not meeting its strategic goal of processing 75% of RORs within 60 days (Appendix E).

In the fourth quarter, the Reviewing Officer and RAD worked with OCIO to launch the new Administrative Fines search system for the website. This new search feature includes capabilities to search closed matters by case number, committee name, and keywords. Case summaries include a new payment status, and the disposition overview now clearly indicates matters that have been challenged or transferred to Department of the Treasury for collection.

Audit Division (Audit)

For the 2018 cycle, the Audit staff referred to the Alternative Dispute Resolution Office (ADRO) Commission-approved findings with violations totaling \$218,416, for which \$5,735 in civil penalties were assessed. One finding, totaling \$106,674, was ultimately referred by ADRO to the Office of General Counsel (OGC), as the committee declined to participate in the ADRO process.

During the fourth quarter of FY 2021, the Audit Division (Audit) processed the following audit reports:

	Audit Report Stage	Number of Reports
Approved by Commission	Final Audit Report	0
Sent to the Committee	Interim Audit Report	2
	Draft Final Audit Report	1
Circulated to Commission	Interim Audit Report (<i>informational and no-objection basis</i>)	1
	Audit Division Recommendation Memorandum	0
	Proposed Final Audit Report	0
Forwarded to OGC	Interim Audit Report	0
	Draft Final Audit Report	5
	Audit Division Recommendation Memorandum	0
Total # of Audit Reports		9

As of the date of this memorandum, Audit has a total of 16 open audits, including one 2018 authorized committee audit; nine 2018 unauthorized committee audits; and six 2020 authorized committee audits, approved by the Commission in the third quarter. Preliminary audit reviews were completed and entrance conferences held for each of the 2020 authorized committee audits, with fieldwork estimated to conclude in five of the six audits in the coming weeks.

For the 2018 cycle authorized committee audit, when providing its response to the Draft Final Audit Report, the committee requested an audit hearing before the Commission. The hearing was granted on October 12, 2021 and will be held on November 10, 2021.

Regarding the 2018 unauthorized committee audits, in the fourth quarter the Commission approved two Interim Audit Reports. The nine open audits are in the following stages: one is in the Interim Audit Report writing stage; one is awaiting the committee's response to the Interim Audit Report; one is in the Draft Final Audit Report writing stage; three are awaiting the legal analysis on the Draft Final Audit Report; two are awaiting the committee responses to the Draft Final Audit Report; and one is in the Audit Division Recommendation Memorandum writing stage.

(b) (7) (E)

With respect to the Presidential Election Campaign Fund (PECF), Audit forwarded four 508 accessibility-compliant monthly PECF reports received from the U.S. Treasury, to the Office of Chief Information Officer (OCIO) for web placement. Audit also coordinated with the Press Office to respond to an inquiry pertaining to the types of resources – financial, personnel, and otherwise, the Commission utilizes to administer and maintain the PECF Program.

(b) (5)

During the fourth quarter, Audit provided assistance to ADRO on seven matters, assisted OGC on six matters and collaborated with OCIO with respect to additional User Acceptance Testing for TeamMate 12.6, the Audit Sampling Program and Crystal Reports. Monthly Division meetings were also held during the quarter which included training on conducting Entrance and Exit Conferences, Parent-Memo Entries for Receipts, and best practices related to committees filing Form 99 Miscellaneous Text Documents, in lieu of amendments, in response to Audit's recommendations.

Additionally, the 2019-2020 Title 52 Unauthorized Audit Program, Materiality Thresholds and Error Definitions circulated for approval during the fourth quarter. (b) (5)

(b) (5)

The Audit Division is currently staffed with 20 Auditors and has nine Auditor vacancies, equivalent to approximately 1/3 of our Auditor staff. In December, another tenured auditor will retire, bringing a total of three Auditor retirements this fiscal year. Combined, these three Auditors served the agency for a total of 74 years. In the fourth quarter, Audit received approval to hire one Auditor. The interview stage for this approved hire was recently completed and Audit looks forward to checking references and making a final selection. With this new hire effectively backfilling our December retiree, we will continue to be down nine auditors heading into 2022. As such, we have requested approval from the Personnel Committee to hire two additional Auditors.

Reports Analysis Division (RAD)

During the fourth quarter of FY 2021, RAD staff continued to implement the RAD Education Program (the Program) for 2019-2020 cycle committees providing eligible committees with an opportunity to participate in tailored training focused on the issues identified during the review of the committees' reports and cited in Requests for Additional Information, in lieu of a referral for an audit. For the cycle, 16 committees were identified as eligible to participate. During the fourth quarter, training sessions were completed for 14 of the committees. Further, the training session for one of the remaining two committees eligible has been scheduled. Additionally, 13 committees have met the Program requirement of filing amended reports for outstanding issues and were sent completion letters. Feedback from surveys sent to the committees that attended the training sessions continues to be positive and indicates that attendees found the sessions to be very helpful. In addition, RAD managers circulated recommendations to the Commission for revisions to Standard 21 (Inaugural Committee Review) of the 2021-2022 RAD Review and Referral Procedures in response to an OIG report.

During the fourth quarter, RAD staff reviewed a total of 19,889 documents totaling 13,339,120 pages and 82.8% of the reports were reviewed within 90 days of receipt, exceeding the strategic goal of 75% of reports reviewed within 90 days of receipt. RAD generated and sent 1,772 letters to the filing community and 86% of RFAs were sent within 40 days of the report review date. Also, during the fourth quarter, RAD generated 35 referrals (10 ADRO, 7 OGC, 6 Administrative Fine, and 12 Audit) and sent 1,280 non-filer notices. In addition, RAD staff handled 2,963 phone calls and 252 emails from the filing community. The Reports Processing Branch coded 10,386,508 transactions, 797 documents and processed 4,254 pages from 439 documents in the Paper Conversion system.

RAD was again active during the fourth quarter in providing training, outreach and assistance, collaborating with the Information Division on the first FEC Virtual Conference and on Candidate Committee, Party/PAC and FECfile webinars. Further, RAD staff conducted an FEC Connect training session for an ADR case. RAD staff assisted the Press Office with the vetting of the 2021-2022 6-month statistical summary and collaborated with the Electronic Filing Office to facilitate the 2021 Mid-Year, July Monthly, August Monthly, September Monthly and TX-06 Special Runoff election reporting reminders for electronic filers. RAD staff also provided extended phone coverage for the 2021 July Quarterly and Mid-Year filing deadlines. In the area of assistance provided to other offices, RAD assisted OGC with 56 matters, ADRO with 17 matters, the Audit Division with 7 matters, the Press Office with 1 matter, the Congressional Affairs Office with 2 matters and responded to 20 inquiries from Commission offices.

RAD management continued its commitment in maintaining positive morale, promoting communication, and providing learning and team building opportunities to staff members in the Office of Compliance. During the fourth quarter, Office Overview sessions were held with the Office of the Commission Secretary and the Fec.gov Front-end UX team, as well as a "Meet a Commissioner Event" with the Chair. RAD management continued to provide a monthly newsletter to staff which includes FEC and RAD news, as well as employee recognition and spotlight features. The RAD team also implemented two important division initiatives during the fourth quarter. The first was the creation of the 2020 FEVS Focus Group to identify opportunities for improvement and develop possible suggestions for improvements within RAD. The group

provided its recommendations to the RAD Management team and we are in the process of developing solutions to address those recommendations. Second, RAD Management and a team of Campaign Finance Analysts formed a working group to create a customer service survey. The survey was sent to filers that have had contact with RAD within the past year. We are in the process of compiling and analyzing the results and plan to provide the Commission with an overview of the results during the next quarter. Finally, all RAD managers received 2020-2021 annual performance assessments and created performance management plans for the 2021-2022 performance period.

In the area of personnel during fourth quarter, one Campaign Finance Analysts (CFA) was promoted to a Senior Campaign Finance & Reviewing Analyst and two Coding Clerks were promoted to Data Disclosure Assistants. In addition, a selection was made to fill one approved CFA position. With a recent resignation, RAD currently has eight additional vacant CFA positions and has requested approval to fill at least three positions with best qualified candidates from the recent CFA posting. (b) (7)(E)

Attachments

Appendix A, FY 2021 Highlights and FY Overview for Office of Compliance Goals

Appendix B, Open Audits Report

Appendix C, Proposed Final Audit Report – Due Date

Appendix D, ADR Civil Penalty Report

Appendix E, AF Performance Goals Report

Appendix F, AF Penalties Assessed and Collected

Status of Compliance

FY 2021
(10/1/2020 – 9/30/2021)

Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (9/30/21)
RAD to code and enter 95% of reports within 30 days of receipt	99.9%	95.9%	99.9%	94.1%	98.5%	89.3%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	99.1%	98.7%	99.0%	99.9%	99.8%	99.9%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%	100%

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2020 Performance Goals	Status 9/30/21
<p>RAD staff provided extended phone coverage from 5:30pm to 8:00pm for the 2021 July Quarterly and Mid-Year reporting deadlines.</p>	<p>RAD staff handled 14 calls for the 2021 July Quarterly and 5 calls for the 2021 Mid-Year filing deadlines between 5:30pm and 8:00pm. 142 total calls were handled on the July Quarterly filing deadline and 72 total calls on the Mid-Year filing deadline.</p>
<p>RAD staff collaborated with the Information Division on the FEC Virtual Conference for Candidates, PACs and Party Committees, as well as the following webinars: Candidate Committee, Party/PAC, and FECfile (2).</p>	<p>An FEC Virtual Conference for Candidates, PACs and Party Committees was held in August 2021. Party/PAC and FECFile webinars were held in July 2021, Candidate Committee and FECfile webinars were held in September 2021.</p>
<p>RAD implemented the RAD Education Program for the 2020 cycle to provide an informal, education-based means for resolving compliance issues, in lieu of an audit in some cases. Eligible committees have an opportunity to participate in tailored training focused on the issues identified during the review of the committees' reports.</p>	<p>RAD staff identified 2 additional committees (1 Party, 1 PAC) as eligible to participate in the RAD Education Program (for a total of 16), one of which agreed to participate. Training sessions were held for 14 committees (4 Candidate, 4 Party and 6 PACs) and completion letters were sent to all 4 Candidate Committees, 6 PACs and 3 Party committees.</p>

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 2: Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs

Performance Goals	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21
RAD to review 75% of reports within 90 days of receipt	92.9%	76.6%	92.2%	76%	91.9%	85.5%
RAD to send 75% of RFAs within 40 days of report review	92%	88%	88%	85%	86%	91%
(b) (7)(E)	100%	96.2%	96.9%	88%	100%	94%
	56%	25%	45%	100%	N/A*	83%
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	81.8%	96.67%	100%	97%	100%	91%
(b) (7)(E)	100%	100%	99%	100%	100%	100%

Strategic Objective 4: Foster a Culture of High Performance

Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (9/30/21)
RAD	Documents/ Transactions Coded	53,107/ 19,385,479	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828	4,873/ 63,983,177	4,512/ 134,373,851
	Documents/Pages Processed in Paper Automation/ Conversion System	N/A	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417	1,771/ 18,028	3,308/ 31,902
	Documents/Pages Reviewed	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699	89,525/ 73,526,421	102,219/ 187,079,514
	Letters sent	13,253	14,796	13,763	12,562	13,838	15,360
	Telephone calls handled	12,362	11,634	13,036	13,149	13,209	13,634
	Email inquiries handled	N/A	N/A	396	658	894	968
	Referrals	43	95	46	82	34	103
	AF Cases RTB/FD	83/33	163/168	95/23	262/93	100/204	384/260
Audit	(b) (7)(E)						
ADRO							
OAR	Cases Received	12	29	8	37	20	34
	Cases Closed (FD)	11	32	10	36	2	42



Open Audits

As of 10/29/2021

(Confidential and Sensitive)

<u>Date of Last Action</u>	<u>Audit Manager</u>	<u>Report Track</u>
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Fieldwork

(b) (3) (A)

Total - 6

Interim/Preliminary Report Writing

(b) (3) (A)

Total - 1

Interim/Preliminary Audit Report Committee Response Period

(b) (3) (A)

Total - 1

Draft Final Audit Report Writing

(b) (3) (A)

Total - 1

Draft Final Audit Report Committee Response Period

2018	REPUBLICAN PARTY OF MINNESOTA - FEDERAL	C00001313	10/14/2021	Morcomb	B
2018	DEMOCRACY ENGINE, INC., PAC	C00468314	10/15/2021	Burgess	B
					Total - 2

Audit Division Recommendation Memorandum Writing

2018	MIKE BRAUN FOR INDIANA	C00653147	10/04/2021	Morcomb	B
2018	CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE	C00167320	10/25/2021	Pacious	B
					Total - 2

Audits in OGC

2018	THE UTE PAC	C00626671	DFAR	09/14/2021	Morcomb	B
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(b) (3) (A)

Total - 3



Open Audits

As of 10/29/2021

(Confidential and Sensitive)

16 Open Audits

Legend

Track B

Audits with findings

Track C

Audits with no findings

IAR

Interim Audit Report

PAR

Preliminary Audit Report

ADRM

Audit Division Recommendation Memorandum

PFAR

Proposed Final Audit Report

Text

If text is red, the report has not been sent to OGC for a legal analysis



Open Audits

As of 10/29/2021
(Confidential and Sensitive)

Audit Caseload

Audit Manager	Number of Audits	Percent of Total Audits ¹
Burgess	3	19%
Morcomb	4	25%
Pacious	4	25%
Smith	3	19%
Yarbrough	2	13%
Totals	16	100%

¹ May not total 100% due to rounding



Open Audits

As of 10/29/2021

(Confidential and Sensitive)

Comments

2018

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)

Connecticut Democratic State Central Committee

(b) (5)

Democracy Engine PAC

(b) (5)

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)

Mike Braun for Indiana

(b) (5)

Republican Party of Minnesota - Federal

(b) (5)

The UTE PAC

(b) (5)

(b) (3) (A)
(b) (5)

2020

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)



Proposed Final Audit Report - Due Date

As of 10/29/2021

(Confidential and Sensitive)

		<u>Audit Manager</u>	<u>Report</u>	<u>Phase</u>	<u>Pre-Audit Start Date</u>
2018	MIKE BRAUN FOR INDIANA	Lmorcomb	ADRM	Memorandum Writing	04/25/2019
2018	DEMOCRACY ENGINE, INC., PAC	Burgess	DFAR	Committee Response Period	10/02/2019

(b) (3) (A)

2018	REPUBLICAN PARTY OF MINNESOTA - FEDERAL	Lmorcomb	DFAR	Committee Response Period	10/02/2019
2018	CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE	Pacious	ADRM	Memorandum Writing	10/02/2019

(b) (3) (A)

2018	THE UTE PAC	Lmorcomb	DFAR	OGC Reviewing	10/02/2019
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(b) (3) (A)

(b) (7)(E)



Proposed Final Audit Report - Due Date

As of 10/29/2021

(Confidential and Sensitive)

16 Open Audits

Legend

IAR	Interim Audit Report
PAR	Preliminary Audit Report
DFAR	Draft Final Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year: 10/01/2019 To: 09/30/2021

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY -2020	912	North Dakota Republican Party Hacker, Nicholas P.	\$8,000.00	07/25/2020	\$8,000.00	08/11/2020	\$0.00	Develop a FEC Compliance Manual	08/24/2020	08/24/2020
	914	Idaho State Democratic Party Hayes, LeRoy	\$4,525.00	07/31/2020	\$4,525.00	07/27/2020	\$0.00	Attend FEC seminar	07/01/2021	06/21/2021
	916	Allen, Levi United Mine Workers of America Power PAC	\$9,000.00	07/31/2020	\$9,000.00	09/02/2020	\$0.00	Develop a FEC Compliance Manual	08/31/2020	09/17/2020
	917	Ruppert, Jeffrey A. Elevate Ohio	\$1,955.00	07/31/2020	\$1,955.00	07/17/2020	\$0.00	Attend FEC seminar	07/01/2021	09/01/2020
	918	Engineers Political Education Committee (EPEC)/International Union of Operating Engineers Hickey, Brian E.	\$8,175.00	07/31/2020	\$8,175.00	07/30/2020	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	07/01/2021 09/29/2020	08/17/2021 07/07/2021
	919	Mackey, Tim LIUNA Minnesota & North Dakota/Laborers' District Council of Minnesota & North Dakota	\$9,950.00	07/29/2020	\$9,950.00	08/13/2020	\$0.00	Attend FEC seminar	06/29/2021	03/24/2021
	921	Scalise for Congress Ottenhoff, Benjamin	\$2,300.00	07/31/2020	\$2,300.00	07/24/2020	\$0.00	Attend FEC seminar	07/01/2021	
	922	Hudson, Gerald	\$12,100.00	07/31/2020	\$12,100.00	08/13/2020	\$0.00	Conduct internal education program for employees or staff	09/29/2020	10/08/2020

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		United We Can						Conduct internal education program for employees or staff	09/29/2020	10/08/2020
	923	Oklahoma Democratic Party Hunsucker, Rachael	\$19,450.00	08/14/2020	\$19,450.00	08/11/2020	\$0.00	Attend FEC seminar	01/15/2021	12/08/2020
								Develop RFAI tracking & response procedures	08/14/2020	07/31/2020
	924	Kallabat, Zinnia Working Michigan (SuperPac)	\$4,500.00	08/14/2020	\$4,500.00	08/06/2020	\$0.00	Attend FEC seminar	07/15/2021	09/02/2020
								Develop a FEC Compliance Manual	10/13/2020	09/26/2020
	925	Massachusetts Republican Party Andersen, Brent	\$5,450.00	08/02/2020	\$5,450.00	10/05/2020	\$0.00	Attend FEC seminar	07/03/2021	07/14/2021
	926	Campos Hernandez, Oriol Todos con Jennifer Inc. DBA Jennifer for Congress	\$5,900.00	07/31/2020	\$5,900.00	07/22/2020	\$0.00	Attend FEC seminar	07/21/2021	
	927	Michigan Republican Party (Registered Cmte) Meyers, Carl	\$37,500.00	07/31/2020	\$37,500.00	07/23/2020	\$0.00	Attend FEC seminar	07/01/2021	09/01/2020
	928	Deaglan McEachern for Congress Tiernan, Lori	\$3,450.00	08/05/2020	\$3,450.00	10/02/2020	\$0.00	Committee will file for termination	10/04/2020	10/15/2020
	929	Lux, Michael Fair and Balanced PAC	\$2,300.00	07/31/2020	\$2,300.00	08/03/2020	\$0.00	Attend FEC seminar	07/01/2021	08/20/2021
	930	Ramirez, Ronald Conservative Triumph Fund	\$2,150.00	07/31/2020	\$2,150.00	12/17/2019	\$0.00	Attend FEC seminar	07/01/2021	06/24/2020
								Develop a FEC Compliance Manual	09/29/2020	
	931	Patients for Affordable Drugs Action Wakana, Benjamin L.	\$6,950.00	07/31/2020	\$6,950.00	07/24/2020	\$0.00	Attend FEC seminar	07/01/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	932	Stoltz, Gail For Our Future	\$2,475.00	07/31/2020	\$2,475.00	08/03/2020	\$0.00	Attend FEC seminar	07/01/2021	
	933	New Jersey Republican State Committee Bengivenga, April	\$5,030.00	07/31/2020	\$5,030.00	09/02/2020	\$0.00	Attend FEC seminar Develop RFAI tracking & response procedures	01/01/2021 07/31/2020	11/19/2020 07/31/2020
	934	Oklahoma Democratic Party Hunsucker, Rachael	\$0.00	07/15/2020				Not Applicable	07/15/2020	12/08/2020
	936	Svoboda, Brian G. Morris, Cindy	\$2,900.00	07/31/2020	\$2,900.00	07/31/2020	\$0.00	Attend FEC seminar	07/01/2021	06/28/2021
	937	Planned Parenthood Votes Barrow-Klein, Vickie	\$4,000.00	07/31/2020	\$4,000.00	08/14/2020	\$0.00	Conduct internal education program for employees or staff	07/01/2021	03/08/2021
	938	Massachusetts Democratic State Committee Yorkis, Paul G.	\$5,550.00	07/31/2020	\$5,550.00	09/14/2020	\$0.00	Attend FEC seminar Develop RFAI tracking & response procedures	01/03/2021 07/31/2020	12/09/2020 07/31/2020
	939	Kahn, Michael Association For Firefighters PAC DBA Association for Firefighters	\$3,850.00	07/31/2020				Attend FEC seminar Develop RFAI tracking & response procedures	07/01/2021 07/31/2020	 07/31/2020
	940	Terry, David Texans for Texas	\$3,175.00	08/02/2020	\$3,175.00	07/24/2020	\$0.00	Committee will file for termination	10/01/2020	07/24/2020
	942	Fight for Tomorrow Mackowiak, Matt L.	\$2,250.00	11/28/2020	\$2,250.00	11/18/2020	\$0.00	Attend FEC seminar	07/01/2021	07/14/2021

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
								Develop a FEC Compliance Manual	09/29/2020	07/15/2021
	944	One Nation United Crevecœur-Macphail, Desiree	\$21,675.00	07/21/2021				Attend FEC seminar	07/21/2021	
								Conduct & certify internal audit/reconciliation	07/21/2021	
									07/21/2022	
								Develop a FEC Compliance Manual	10/21/2020	
	946	Utah State Democratic Committee Srivastava, Sheila	\$5,310.00	07/31/2020	\$5,310.00	06/29/2020	\$0.00	Attend FEC seminar	01/04/2021	11/20/2020
								Develop RFAI tracking & response procedures	07/31/2020	07/31/2020
	947	Build the Wave Lerner, Nathan	\$4,125.00	05/03/2021	\$4,125.00	12/07/2020	\$0.00	Attend FEC seminar	08/06/2021	
								Develop a FEC Compliance Manual	11/04/2020	
	948	Human Rights Campaign Equality Votes Rinefierd, James M.	\$2,350.00	07/31/2020	\$2,350.00	08/19/2020	\$0.00	Attend FEC seminar	07/01/2021	03/24/2021
								Develop a FEC Compliance Manual	09/29/2020	09/29/2020
	949	Bayer U.S. LLC Political Action Committee Branca, Brian	\$6,250.00	09/05/2020	\$6,250.00	08/24/2020	\$0.00	Attend FEC seminar	08/06/2021	
								Conduct internal education program for employees or staff	11/04/2020	10/06/2020
								Develop a FEC Compliance Manual	11/04/2020	10/06/2020
	950	Arizona Republican Party Lettieri, Bob	\$3,900.00	07/31/2020	\$3,900.00	09/02/2020	\$0.00	Adopt and distribute policy regarding contributions to federal elections	07/31/2020	02/03/2020
	952	CASA in Action PAC	\$13,500.00	07/31/2020	\$13,500.00	09/02/2020	\$0.00	Attend FEC seminar	07/01/2021	09/02/2020

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		Guzman, Melissa						Attend FEC seminar Conduct & certify internal audit/reconciliation Develop a FEC Compliance Manual	07/01/2021 07/31/2020 09/29/2020	09/02/2020 07/01/2020
	953	Hotel Workers for Stronger Communities	\$2,900.00	07/31/2020	\$2,900.00	08/12/2020	\$0.00	Attend FEC seminar Other	07/01/2021 07/31/2020	03/24/2021 08/28/2020
	954	Kutac, Paul Americans for Police and Trooper Safety	\$3,000.00	07/31/2020	\$3,000.00	08/20/2020	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	07/01/2021 09/29/2020	01/14/2021 09/29/2020
	956	Zucker, Jonathan It Starts Today	\$5,450.00	07/31/2020	\$5,450.00	08/03/2020	\$0.00	Attend FEC seminar Conduct & certify internal audit/reconciliation Develop a FEC Compliance Manual	07/01/2021 07/01/2021 09/29/2020	03/03/2021 07/07/2021 09/29/2020
Sub-Total : FY -2020			\$241,345.00		\$215,820.00		\$0.00			
FY -2021	1000	International Brotherhood of Boilermakers Campaign Assistance Fund Creeden, William T.	\$5,140.00	09/14/2021	\$5,140.00	09/09/2021	\$0.00	Attend FEC seminar	09/11/2022	07/14/2021
	1001	South Dakota First Boysen, Sharon	\$790.00	09/30/2021	\$790.00	09/23/2021	\$0.00	Committee will file for termination	09/30/2021	
	1002	Kyriacopoulos, Janica Future Progress	\$12,400.00	08/27/2021	\$12,400.00	08/19/2021	\$0.00	Conduct internal education program for employees or staff Develop a FEC Compliance Manual	10/26/2021 10/26/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	1003	American Freedom Fund Jones, Bill	\$2,500.00	09/05/2021	\$2,500.00	09/02/2021	\$0.00	Conduct internal education program for employees or staff	11/04/2021	
	1004	Crate, Bradley T. Van Drew for Congress Crate, Bradley T. Van Drew for Congress	\$4,415.00	09/27/2021	\$4,415.00	09/01/2021	\$0.00	Designate staff member as person responsible for FEC compliance	08/25/2022 08/25/2023	
	1005	Our Voice Our Vote Arizona PAC Johnson, Ryan	\$8,500.00	09/24/2021	\$8,500.00	09/24/2021	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	08/25/2022 11/23/2021	
	1007	MAD DOG PAC Taylor, Claude	\$2,100.00	10/08/2021	\$2,100.00	10/06/2021	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	09/08/2022 12/07/2021	
	1008	League of Southeastern Credit Unions Federal PAC Green, Brad	\$2,805.00	09/27/2021	\$2,805.00	08/27/2021	\$0.00	Attend FEC seminar	08/25/2022	07/14/2021
	1009	LIUNA Minnesota & North Dakota/Laborers' District Council of Minnesota & North Dakota Smith, Joel A.	\$4,300.00	08/27/2021	\$4,300.00	08/24/2021	\$0.00	Conduct internal education program for employees or staff Other	10/26/2021 10/26/2021	10/14/2021 10/14/2021
	1010	Satterfield, David Conservatives Acting Together Political Action Committee (CATPAC)	\$6,100.00	10/08/2021				Conduct internal education program for employees or staff Other	12/07/2021 10/08/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	1011	Satterfield, David Anna Paulina Luna for Congress	\$2,800.00	10/08/2021				Conduct internal education program for employees or staff	12/07/2021	
	1012	Independent Alaska Orr, Susanna	\$2,800.00	10/04/2021	\$2,800.00	09/27/2021	\$0.00	Adopt and distribute policy regarding contributions to federal elections	10/04/2021	
	1014	JewsChoose4MoreYears Greenwald, Carol	\$3,000.00	08/13/2021	\$3,000.00	07/19/2021	\$0.00	Committee will file for termination	10/12/2021	07/19/2021
	1015	LaTurner for Senate Hill , DeAnn	\$8,400.00	10/20/2021	\$8,400.00	10/18/2021	\$0.00	Attend FEC seminar	09/15/2022	
	1016	Freedom Club Federal PAC Morgan, Richard G.	\$1,550.00	10/08/2021	\$1,550.00	09/16/2021	\$0.00	Attend FEC seminar Other	09/08/2022 10/08/2021	
	1018	Farhat, Elianne TakeAction MN Federal Fund	\$7,500.00	10/08/2021	\$7,500.00	09/27/2021	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	09/08/2022 12/07/2021	
	1020	BLACK AMERICA'S POLITICAL ACTION COMMITTEE Ekam, Margaret	\$2,725.00	10/20/2021	\$2,725.00	09/23/2021	\$0.00	Attend FEC seminar	09/20/2022	
	1022	Rozansky, Adam CLUB FOR GROWTH ACTION	\$14,500.00	10/01/2021	\$14,500.00	09/08/2021	\$0.00	Attend FEC seminar Other	09/01/2022 10/01/2021	10/01/2021
	1023	Rural Colorado United Autobee, George	\$3,800.00	10/29/2021				Attend FEC seminar Develop a FEC Compliance Manual	09/29/2022 11/28/2021	
	1024	Committee to Re-Elect the President	\$2,150.00	09/24/2021	\$2,150.00	09/28/2021	\$0.00	Committee will file for termination	09/24/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		Bennett, Jason						Committee will file for termination	09/24/2021	
	1025	Poder NC Action	\$6,575.00	10/22/2021	\$6,575.00	10/25/2021	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	12/15/2021 12/15/2021	
	1028	International Longshore and Warehouse Union -- Political Action Fund Ferris, Edwin R.	\$2,400.00	10/22/2021	\$2,400.00	09/28/2021	\$0.00	Develop a FEC Compliance Manual	12/15/2021	
	1029	Big Sky 55+	\$3,350.00	10/22/2021	\$3,350.00	10/22/2021	\$0.00	Attend FEC seminar	09/22/2022	
	1036	MI Planned Parenthood Votes Keserich, John	\$12,150.00	10/22/2021				Attend FEC seminar Develop a FEC Compliance Manual	09/22/2022 12/22/2021	
	920	Pulaski, Art Million More Voters, Sponsored by the California Labor Federation, AFL-CIO	\$5,450.00	05/15/2021	\$5,450.00	05/07/2021	\$0.00	Committee will file for termination	07/14/2021	06/02/2021
	935	South Dakota Democratic Party Committee Bunger, Marcia	\$7,200.00	08/26/2021	\$7,200.00	08/25/2021	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual Develop RFAI tracking & response procedures	01/23/2022 10/28/2021 08/26/2021	
	943	Cramer, Thomas A. Democratic Advancement PAC	\$8,815.00	06/08/2022				Attend FEC seminar Develop RFAI tracking & response procedures File amended reports	06/05/2022 12/06/2021 12/06/2021	
	945	WFP IE Committee Boland, Mike	\$12,000.00	10/14/2021				Attend FEC seminar	11/13/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
								Conduct & certify internal audit/reconciliation	09/14/2022	
									09/14/2023	
								Develop a FEC Compliance Manual	11/13/2021	
								Develop RFAI tracking & response procedures	10/14/2021	
	955	Varban, Alex Americans for Prosperity Action, Inc. (AFP Action)	\$18,350.00	02/18/2021	\$18,350.00	02/09/2021	\$0.00	Attend FEC seminar	01/19/2022	04/21/2021
								Develop a FEC Compliance Manual	04/19/2021	03/08/2021
	957	Beto for Texas (FKA Beto O'Rourke for Congress Committee) Pulido, Gwendolyn L.	\$5,900.00	06/21/2021	\$5,900.00	06/03/2021	\$0.00	Committee will file for termination	08/21/2021	07/15/2021
	960	Campbell, Tom Tom Campbell for North Dakota	\$2,250.00	12/31/2020	\$2,250.00	02/09/2021	\$0.00	Committee will file for termination	02/28/2021	02/11/2021
	961	DNC Services Corp / Democratic National Committee Derrough, William Q.	\$10,500.00	02/18/2021	\$10,500.00	01/28/2021	\$0.00	Attend FEC seminar	01/19/2022	05/26/2021
	963	Communities for a New California C4	\$6,400.00	01/14/2022	\$4,950.00	10/13/2021	\$1,450.00	Attend FEC seminar	01/19/2022	
								Other	02/18/2021	02/17/2021
	964	Case Action Fund	\$6,650.00	10/14/2020	\$6,650.00	10/14/2020	\$0.00	Attend FEC seminar	01/24/2022	05/27/2021
								Develop a FEC Compliance Manual	04/26/2021	04/12/2021
	965	VoteVets.org Action Fund	\$6,250.00	02/25/2021	\$6,250.00	02/10/2021	\$0.00	Attend FEC seminar	01/24/2022	
	966	Credit Suisse Securities (USA) LLC PAC Guarin, Cecilia	\$1,625.00	06/14/2021	\$1,625.00	05/17/2021	\$0.00	Attend FEC seminar	04/15/2022	01/05/2021
								Other	06/14/2021	02/01/2021

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	967	Marston, Christopher M. Liberty for Us Super PAC	\$17,400.00	10/12/2021	\$17,400.00	05/06/2021	\$0.00	Attend FEC seminar Conduct & certify internal audit/reconciliation Develop a FEC Compliance Manual	04/15/2022 05/15/2022 07/14/2021	07/14/2021 06/30/2021
	968	Friends of John Delaney Nordberg, Edward P.	\$5,000.00	02/18/2021	\$5,000.00	01/26/2021	\$0.00	Attend FEC seminar	01/19/2022	
	970	The 2016 Committee Saracino, William	\$10,000.00	03/20/2021	\$10,000.00	03/05/2021	\$0.00	File amended reports	03/20/2021	03/03/2021
	972	Canegata, John M. VIGOP (Virgin Islands Republican Party)	\$2,445.00	03/16/2021	\$2,445.00	03/15/2021	\$0.00	Adopt and distribute policy regarding contributions to federal elections Develop a FEC Compliance Manual	03/16/2021 05/17/2021	05/16/2021 05/16/2021
	973	Phillips, Robert GRIT PAC	\$1,900.00	02/18/2021	\$1,900.00	10/05/2020	\$0.00	Attend FEC seminar Other	01/19/2022 02/18/2021	07/14/2021 09/18/2020
	974	Kilgore, Paul SEAL PAC Supporting Electing American Leaders PAC	\$2,700.00	03/16/2021	\$2,700.00	03/11/2021	\$0.00	Adopt and maintain guidelines governing contributions to federal elections	02/16/2021	03/16/2021
	976	Free Forever Political Action Committee Krason, Patrick	\$5,500.00	03/18/2021				Attend FEC seminar Committee will file for termination	02/16/2022 05/17/2021	
	977	Perfect Together PAC, Inc. Mondella, Theresa	\$1,300.00	03/19/2021	\$1,300.00	04/07/2021	\$0.00	Committee will file for termination	04/17/2021	04/09/2021

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	978	Kilgore, Paul Protect Freedom Political Action Committee	\$2,125.00	03/18/2021	\$2,125.00	04/08/2021	\$0.00	Attend FEC seminar	02/16/2022	
	981	ACTBLUE Hill, Erin	\$3,300.00	03/26/2021	\$3,300.00	03/18/2021	\$0.00	Conduct & certify internal audit/reconciliation Other	05/25/2021 03/26/2021	03/25/2021 03/25/2021
	984	Marston, Christopher M. American Values PAC	\$2,250.00	05/07/2021	\$2,250.00	04/16/2021	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	04/07/2022 07/06/2021	03/24/2021 06/30/2021
	985	PROTECTING OUR VOTE PAC Woodard, Kimberly A.	\$3,650.00	05/14/2021	\$3,650.00	05/13/2021	\$0.00	Conduct internal education program for employees or staff Other	07/13/2021 05/14/2021	06/28/2021 05/14/2021
	986	Democratic Progress Carson, Jeffrey	\$4,600.00	05/07/2021	\$4,600.00	04/20/2021	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	04/07/2022 07/06/2021	08/17/2021 06/15/2021
	987	Guernsey, Sherwood RURAL FREEDOM NETWORK	\$2,275.00	04/24/2021	\$2,275.00	03/31/2021	\$0.00	Conduct internal education program for employees or staff	06/23/2021	05/03/2021
	989	Hometown Values PAC Helgesen, Francis Xavier	\$2,700.00	07/08/2021	\$2,700.00	07/16/2021	\$0.00	Committee will file for termination		
	991	Leon County Democratic Executive Committee Carpenter, Kevin Richard	\$800.00	12/16/2021	\$800.00	07/09/2021	\$0.00	Attend FEC seminar Designate Compliance Specialist	06/16/2022 07/16/2021	 07/12/2021
	992	Midwest Victory PAC	\$1,375.00	04/23/2021	\$1,375.00	04/12/2021	\$0.00	Committee will file for termination	04/27/2021	04/27/2021

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		Mauro, Nick J.						Committee will file for termination	04/27/2021	04/27/2021
	993	Alliance for a Better Minnesota Federal PAC Davis, Joe	\$11,535.00	08/27/2021	\$11,535.00	09/03/2021	\$0.00	Attend FEC seminar	07/28/2022	
	996	Glaze, Kayla Louisiana Legacy PAC	\$1,275.00	07/09/2021	\$1,275.00	07/09/2021	\$0.00	Attend FEC seminar	06/09/2022	
	997	VanWyhe, Kimberly Denali Leadership PAC	\$5,150.00	07/23/2021	\$5,150.00	07/30/2021	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	06/23/2022 09/21/2021	07/14/2021 07/29/2021
	998	Patriot's Fund Greenlee, Scott	\$5,600.00	07/09/2021	\$5,600.00	07/09/2021	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	06/09/2022 09/07/2021	
Sub-Total : FY -2021			\$307,020.00		\$254,405.00		\$1,450.00			
Grand Total :			\$548,365.00		\$470,225.00		\$1,450.00			



AF Performance Goals

Print Date: October 29, 2021

Selected Parameters:

Office: Both

Start Date: 10/01/2020

End Date: 09/30/2021

*Exception: YES



AF Performance Goals

(Confidential and Sensitive)

RAD

(b) (7)(E)

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date
Processed					
2020	YE	H_S_P_UNAUTH	N	01/31/2021	03/31/2021
2020	M12	P_UNAUTH	N	12/20/2020	02/17/2021
2020	30G	UNAUTH	N	12/03/2020	03/17/2021
2020	30G	AUTH	N	12/03/2020	01/22/2021
2020	M11	P_UNAUTH	N	11/20/2020	01/19/2021
2020	12G	UNAUTH_Q	Y	10/22/2020	03/02/2021
2020	12G	AUTH	Y	10/22/2020	12/14/2020
2020	12G	UNAUTH_M	Y	10/22/2020	12/14/2020
2020	M10	P_UNAUTH	N	10/20/2020	12/10/2020
2020	M10	P_UNAUTH	Y	10/20/2020	12/10/2020
2020	Q3	H_S_P_UNAUTH	N	10/15/2020	12/10/2020
2020	Q3	H_S_P_UNAUTH	Y	10/15/2020	12/03/2020
2020	M9	P_UNAUTH	N	09/20/2020	11/16/2020
2020	12P	AUTH	Y	08/27/2020	10/13/2020
2020	M8	P_UNAUTH	N	08/20/2020	10/13/2020
2021	MY	UNAUTH	N	07/31/2021	09/23/2021
2021	M7	P_UNAUTH	N	07/20/2021	09/14/2021
2021	Q2	H_S_P	N	07/15/2021	09/14/2021
2021	M5	P_UNAUTH	N	05/20/2021	06/30/2021
2021	Q1	H_S_P	N	04/15/2021	06/02/2021
2021	M2	P_UNAUTH	N	02/20/2021	04/12/2021

Total AF Reports Processed 21

Average Processing Days 59.29

(b) (7)(E)

Percentage to Goal 85.71%

Processed - No committees

				Action Date
2020	30GR	AUTH	N	01/04/2021
2020	30SGR	AUTH	N	12/31/2020

(b) (7)(E)



AF Performance Goals

(Confidential and Sensitive)

Processed - No committees

Action Date

(b) (7)(E)

2020	30GR	AUTH	N	12/17/2020	02/12/2021
2020	30SG	AUTH	N	12/03/2020	01/22/2021
2020	12GR	AUTH	Y	11/23/2020	01/19/2021
2020	12SGR	AUTH	Y	11/19/2020	12/22/2020
2020	12GR	AUTH	Y	11/05/2020	12/14/2020
2020	30SG	AUTH	N	10/29/2020	12/14/2020
2020	12SG	AUTH	Y	10/22/2020	12/10/2020
2020	12SG	AUTH	Y	09/17/2020	10/20/2020
2020	12P	AUTH	Y	09/03/2020	10/13/2020
2020	12P	AUTH	Y	08/20/2020	10/13/2020
2021	30SGR	AUTH	N	08/26/2021	09/27/2021
2021	M8	P_UNAUTH	N	08/20/2021	09/23/2021
2021	12SP	AUTH	Y	07/22/2021	09/14/2021
2021	12SGR	AUTH	Y	07/15/2021	09/09/2021
2021	30SG	AUTH	N	07/01/2021	08/26/2021
2021	M6	P_UNAUTH	N	06/20/2021	07/29/2021
2021	30SG	AUTH	N	05/31/2021	07/07/2021
2021	30SGR	AUTH	N	05/24/2021	06/30/2021
2021	12SG	AUTH	Y	05/20/2021	06/24/2021
2021	M4	P_UNAUTH	N	04/20/2021	06/03/2021
2021	12SG	AUTH	Y	04/19/2021	06/03/2021
2021	30SG	AUTH	N	04/19/2021	06/02/2021
2021	12SGR	AUTH	Y	04/12/2021	06/01/2021
2021	M3	P_UNAUTH	N	03/20/2021	04/29/2021
2021	12SG	AUTH	Y	03/08/2021	04/14/2021
2021	30GR	AUTH	N	02/04/2021	04/01/2021
2021	30SGR	AUTH	N	02/04/2021	04/01/2021
2021	12GR	AUTH	Y	12/24/2020	02/17/2021
2021	12SGR	AUTH	Y	12/24/2020	02/17/2021

Total AF Reports Processed-No Committees 31

Average Processing Days 45.55

(b) (7)(E)

Percentage to Goal 100.00%



AF Performance Goals

(Confidential and Sensitive)

Total AF Reports 52

Average Processing Days 51.10

(b) (7)(E)

Percentage to Goal 94.23%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters
RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2019	MY	3748	C00634964	08/07/2020	10/06/2020	60	Y
2019	M8	3749	C00008409	09/24/2020	11/23/2020	60	Y
2019	Q3	3758	C00615013	09/08/2020	11/06/2020	59	Y
2019	YE	3776	C00634964	08/07/2020	10/06/2020	60	Y
2019	YE	3778	C00615013	09/08/2020	11/06/2020	59	Y
2019	YE	3780	C00426569	08/25/2020	10/23/2020	59	Y
2020	12P	3789	C00676320	08/20/2020	10/19/2020	60	Y
2020	Q1	3816	C00691709	09/17/2020	11/13/2020	57	Y
2020	Q1	3823	C00634964	08/07/2020	10/06/2020	60	Y
2020	Q1	3826	C00615013	09/08/2020	11/06/2020	59	Y
2020	Q1	3827	C00638148	08/08/2020	10/07/2020	60	Y
2020	Q1	3829	C00725994	11/05/2020	01/04/2021	60	Y
2020	Q1	3831	C00676320	08/20/2020	10/19/2020	60	Y
2020	12P	3834	C00154625	08/17/2020	10/16/2020	60	Y
2020	30SG	3848	C00718635	02/11/2021	04/01/2021	49	Y
2020	M6	3853	C00702324	02/16/2021	04/01/2021	44	Y
2020	Q2	3867	C00656033	04/29/2021	06/24/2021	56	Y
2020	Q2	3878	C00710608	02/17/2021	04/16/2021	58	Y
2020	Q2	3883	C00104455	03/18/2021	05/17/2021	60	Y
2020	Q2	3885	C00581199	03/31/2021	09/29/2021	182	N
2020	Q2	3904	C00676320	02/10/2021	03/31/2021	49	Y
2020	M7	3908	C00702324	02/16/2021	04/01/2021	44	Y
2020	12P	3912	C00656033	04/29/2021	06/24/2021	56	Y
2020	12PR	3916	C00741397	03/09/2021	05/07/2021	59	Y



AF Performance Goals

(Confidential and Sensitive)

2020	M8	3919	C00702324	02/16/2021	04/01/2021	44	Y
2020	M9	3927	C00702324	02/16/2021	04/01/2021	44	Y
2020	Q3	3938	C00743146	02/17/2021	06/25/2021	128	N
2020	Q3	3941	C00710608	02/17/2021	04/16/2021	58	Y
2020	Q3	3944	C00303032	03/23/2021	05/21/2021	59	Y
2020	Q3	3955	C00708941	02/17/2021	04/15/2021	57	Y
2020	Q3	3957	C00656033	04/29/2021	06/24/2021	56	Y
2020	Q3	3962	C00735910	03/26/2021	05/20/2021	55	Y
2020	Q3	3971	C00715748	03/08/2021	05/07/2021	60	Y
2020	Q3	3981	C00581199	03/31/2021	09/29/2021	182	N
2020	M10	4011	C00702324	02/16/2021	04/01/2021	44	Y
2020	12G	4015	C00702324	02/16/2021	04/01/2021	44	Y
2020	48H	4034	C00745760	05/04/2021	07/09/2021	66	N
2020	30G	4075	C00743146	04/27/2021	06/25/2021	59	Y
2020	30G	4080	C00749861	05/19/2021	07/01/2021	43	Y
2020	30G	4086	C00556605	04/16/2021	06/15/2021	60	Y
2020	30G	4094	C00406645	05/24/2021	07/22/2021	59	Y
2020	YE	4131	C00743146	04/27/2021	06/25/2021	59	Y
2020	YE	4149	C00702043	05/06/2021	07/01/2021	56	Y
2020	YE	4181	C00103861	04/27/2021	06/21/2021	55	Y

Total Challenges Processed 44

Average Processing Days 63.14

Total Reports Processed within 60 Days 40

Percentage to Goal 90.91%



AF Performance Goals

(Confidential and Sensitive)

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

Administrative Fine Program
Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (9/30/21)
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$131,164	\$318,495	\$522,874	\$968,505

(b) (7)(E)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED

By Office of the Commission Secretary at 3:38 pm, Jan 31, 2022

SENSITIVE

January 31, 2022

MEMORANDUM

AGENDA DOCUMENT NO. X22-04
AGENDA ITEM
For the meeting of February 15, 2022

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista Roche *PCO for KR*
Director
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Dayna C. Brown *DCB*
Assistant Staff Director
Audit Division

Debbie Chacona *DC for DC*
Assistant Staff Director
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2022 – 1st Quarter Highlights (10/1/21 – 12/31/21)

The Office of Compliance (Compliance) submits this memorandum to provide the Commission with a snapshot of accomplishments and highlights for the first quarter of FY 2022 (10/1/21 – 12/31/21). The intent of this document is to provide an update of the workload and achieved results of the Office of Compliance on a quarterly basis. The Status of Compliance and the Directive 68 (Statute of Limitations) documents are scheduled to be discussed during an upcoming Executive Session.

The attached **Appendix A** provides the Commission with first quarter highlights and a statistical overview of FY 2022 results and performance goals outlined within the 2018-2022 Strategic Plan adopted by the Commission. **Appendix B** provides an overview of all open audits and their respective stages within the audit process. **Appendix C** is an Audit Report entitled 'Proposed Final Audit Report – Due Date' which highlights the report manager, stage, phase, pre-audit start date, fieldwork begin date and the date the Proposed Final Audit Report must be approved in order to meet the current Strategic Plan goal. **Appendix D** (ADRO Civil Penalty

Report) highlights civil penalties assessed, paid and an overview of non-monetary terms to include date due and completed. **Appendix E** (AF Performance Goals Report) shows FY 2022 statistics for meeting strategic performance goals related to the Administrative Fine Program. **Appendix F** (AF Penalties Assessed and Collected) shows the total amount of penalties assessed and collection rate for FY 2015 – 2022.

As always, we welcome any feedback or suggestions that could be incorporated to enhance the presentation of the information contained within the document.

Alternative Dispute Resolution Office (ADRO)

In the first quarter of FY 2022, the ADRO received 22 cases including 7 from the Reports Analysis Division (RAD), 1 from the Office of General Counsel (OGC), 6 audit transfers approved by the Commission, and 8 other matters directly from the Commission. During this time period, the ADRO closed 15 matters – all of them approved Negotiated Settlements. The Commission assessed \$83,575 in civil penalties and collected \$132,250 during the quarter.

During the first quarter, the ADRO circulated recommendations in 16 matters. (b) (7)(E)

There are currently 2 matters pending with the Commission for a vote.

During the first quarter, ADRO focused on improving our efficiency handling a high caseload. Staff continued to work with OCIO to implement enhancements to its case management systems, ensuring that Law Manager functions to automate drafts of our case processing documents including memos, correspondence, settlements, and recommendations. Further, ADRO continued to develop and implement a custom case tracking application to manage day-to-day details of our workflow and automate reports. ADRO will work closely with OCIO as the new application is deployed in the second quarter.

Administrative Fine Program (Office of Administrative Review)

During the first quarter of FY 2022, the Commission processed 18 Reason to Believe (RTB) findings. OAR received challenges in 4 cases and processed 4 Reviewing Officer Recommendations (RORs). The Commission reviewed final determination recommendations in 143 cases, made a final determination that the respondents in 142 cases violated 52 U.S.C. § 30104(a), and assessed \$421,233 in civil penalties. The Commission also collected \$59,078 in fine payments and prepared 101 cases for public release.

(b) (7)(E)

OAR forwarded 75% of RORs within 60 days of receipt of each challenge, meeting its strategic goal of processing 75% of RORs within 60 days (Appendix E).

In the first quarter, OAR and RAD worked with the OCIO to prepare for the 2022 Inflation Adjustments for Civil Money Penalties. The adjusted penalties went into effect on December 28, 2021. OAR and RAD ensured necessary updates were made to internal programs, website content, and the Administrative Fine Calculator.

Audit Division (Audit)

During the first quarter of FY 2022, the Audit Division (Audit) processed the following audit reports:

	Audit Report Stage	Number of Reports
Approved by Commission	Final Audit Report	0
Sent to the Committee	Interim Audit Report	1
	Draft Final Audit Report	4
Circulated to Commission	Interim Audit Report (<i>informational and no-objection basis</i>)	1
	Audit Division Recommendation Memorandum	2
	Proposed Final Audit Report	1
Forwarded to OGC	Interim Audit Report	0
	Draft Final Audit Report	4
	Audit Division Recommendation Memorandum	2
	Total # of Audit Reports	15

As of the date of this memorandum, Audit has a total of 21 open audits, including one 2018 authorized committee audit; eight 2018 unauthorized committee audits; six 2020 authorized committee audits; and six unauthorized committee audits.

In addition to the Commission holding two Audit Hearings in December, a 2018 cycle unauthorized committee also requested an audit hearing before the Commission in December. The hearing was granted on December 15, 2021 and awaiting scheduling by the Commission.

The following chart details the Audit stage for all (21) open audits. Audits awaiting a legal analysis on the Interim Audit Report (IAR), Draft Final Audit Report (DFAR) or the Audit Division Recommendation Memorandum (ADRM) are noted with "In OGC" in the applicable column.

	First SOL	Pre-Audit	Field-Work	Awaiting Cmte Exit Response	IAR	Awaiting Cmte IAR Response	DFAR	Awaiting Cmte DFAR Response	ADRM	PFAR	*With Commission
2018 Authorized Audit (1)											
MIKE BRAUN FOR INDIANA	9/2022								In OGC		
2018 Unauthorized Audits (8)											

(b) (3) (A)

CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE	4/2022									X		ADRM
DEMOCRACY ENGINE, INC. PAC	4/2023											ADRM

(b) (3) (A)

THE UTE PAC <i>Tolling: 73 days</i>	2/2022											Audit Hearing
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(b) (3) (A)

	First SOL	Pre- Audit	Field- Work	Awaiting Cmte Exit Response	IAR	Awaiting Cmte IAR Response	DFAR	Awaiting Cmte DFAR Response	ADRM	PFAR	*With Commission
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2020 Authorized Audits (6)											
(b) (3) (A)											

2020 Unauthorized Audits (6)											
(b) (3) (A)											

(b) (7) (E)

During the first quarter, Audit provided assistance to ADRO on two matters, assisted OGC on two matters and collaborated with OCIO with respect to additional User Acceptance Testing for the Audit Sampling Program and Crystal Reports. Monthly Division meetings were also held during the quarter which included training on best practices related to committees filing Form 99 Miscellaneous Text Documents, in lieu of amendments, in response to Audit's recommendations; and an overview of Audit documents to be used for the 2020 Unauthorized Audits in lieu of an approved Audit Program, Error Definitions and Materiality Thresholds. Additionally, the 2019-2020 Title 52 Redacted Authorized Materiality Thresholds, which are currently pending with the Commission, were circulated for approval in November.

(b) (5)

(b) (7)(E), (b) (5)

Lastly, Audit advised the committee's treasurer of the status of the resubmission. Audit referenced previous communications addressing the timing of the resubmission and stated that the Commission will decide whether the candidate may be considered for matching funds. Audit will communicate with the treasurer once the Commission's directive is available.

With regard to personnel, a tenured Auditor retired on December 31st; however, we warmly welcomed a new Auditor on January 18th. As such, the Division continues to be staffed with 20 Auditors, with nine (9) Auditor vacancies. During the first quarter, the personnel committee approved the hire of two additional Auditors, for which the vacancy announcement closed in January. As we continue to process the 21 current open audits and plan for the 2022 audits, taking into consideration the four additional Auditors who are eligible to retire in the next two years, we will seek approval from the personnel committee to backfill more of our nine (9) vacancies.

Reports Analysis Division (RAD)

During the first quarter of FY 2022, RAD staff reviewed a total of 15,184 documents totaling 8,336,969 pages and 87% of the reports were reviewed within 90 days of receipt, exceeding the strategic goal of 75% of reports reviewed within 90 days of receipt. RAD generated and sent 1,263 letters to the filing community and 87% of RFAIs were sent within 40 days of the report review date. Also, during the first quarter, RAD generated 18 referrals (7 ADRO, 5 OGC, 4 Administrative Fine, 1 Debt Settlement, and 1 Administrative Termination) and sent 482 non-filer notices. In addition, RAD staff handled 2,308 phone calls and 201 emails from the filing community. The Reports Processing Branch coded 14,830,878 transactions, 478 documents and processed 5,951 pages from 541 documents in the Paper Conversion system.

RAD management continued its focus on maintaining positive morale, promoting communication, and providing learning and team building opportunities to staff members in the virtual environment. During the first quarter, RAD staff coordinated and moderated a "Meet a Commissioner Event" with the former Vice Chair for Office of Compliance staff. RAD management continued to provide a monthly newsletter to staff which included FEC and RAD news, professional development resources, as well as employee recognition and spotlight features. In response to the feedback from the 2020 Federal Employee Viewpoint Survey (FEVS) working group, RAD management created a professional development folder with resources and training opportunities for staff. Also during the first quarter, RAD compiled and began to analyze the RAD Customer Satisfaction Survey results and provided an overview of the results to the Commission. We will continue to analyze the results and identify areas that can be improved upon.

RAD was again active during the first quarter in providing training, outreach and assistance, collaborating with the Information Division on an FEC Virtual Conference, a Nonconnected committee webinar and FEC Connect OnTopic informal discussions on "How to Contact Your Committee's Analyst" and "Registration for PACs and Party Committees." Further, RAD staff conducted an FEC Connect training session for an ADR case. RAD staff collaborated with the Electronic Filing Office to facilitate the 2021 October Quarterly, October Monthly,

November Monthly, December Monthly and OH-11, OH-15, FL-20 Pre and Post Special General election reporting reminders for electronic filers. RAD staff also provided extended phone coverage for the 2021 October Quarterly filing deadline. In the area of assistance provided to other offices, RAD assisted OGC with 30 matters, ADRO with 2 matters, the Audit Division with 6 matters, the Press Office with 2 matters, the Congressional Affairs Office with 1 matter and responded to 6 inquiries from Commission offices.

In the area of personnel during first quarter, one Campaign Finance Analyst (CFA) resigned, and we welcomed one CFA on the Authorized Branch. RAD currently has eight vacant CFA positions (3 Authorized Branch and 5 Party/NonParty Branch) and has requested approval to fill at least three positions with best qualified candidates from the recent CFA posting if these candidates are still available, which would save the division time and resources. It should also be noted that we currently have three vacant Coding Clerk positions and have requested approval to fill two. (b) (7)(E)

Attachments

Appendix A, FY 2022 Highlights and FY Overview for Office of Compliance Goals

Appendix B, Open Audits Report

Appendix C, Proposed Final Audit Report – Due Date

Appendix D, ADR Civil Penalty Report

Appendix E, AF Performance Goals Report

Appendix F, AF Penalties Assessed and Collected

Status of Compliance

FY 2022
(10/1/2021 – 12/31/2021)

Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22 (12/31/21)
RAD to code and enter 95% of reports within 30 days of receipt	95.9%	99.9%	94.1%	98.5%	89.3%	99.1%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	98.7%	99.0%	99.9%	99.8%	99.9%	99.7%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%	100%

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2022 Performance Goals	Status 12/31/21
RAD staff provided extended phone coverage from 5:30pm to 8:00pm for the 2021 October Quarterly reporting deadline.	RAD staff handled 25 calls for the 2021 October Quarterly filing deadline between 5:30pm and 8:00pm. 153 total calls were handled on the October Quarterly filing deadline.
RAD staff collaborated with the Information Division on the FEC Virtual Conference for Candidates, PACs and Party Committees, a webinar for Nonconnected committees, as well as the FEC Connect OnTopic informal discussion on “How to Contact Your Committee’s Analyst.”	The FEC Virtual Conference for Candidates, PACs and Party Committees was held in November 2021. The Nonconnected committee webinar and FEC OnTopic session were held in December 2021.
RAD staff collaborated with OCIO to implement two of the Scam PAC working group’s website recommendations: Displaying Percentage of Political Committee’s Disbursements Spent on Specific Vendors and Amending Column Headers on Political Committee Search Pages to clarify committee types.	The new features went live on FEC.gov in December 2021.

Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

Performance Goal 2: Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs

Performance Goals	FY 17	FY 18	FY 19	FY 20	FY 21	FY22
RAD to review 75% of reports within 90 days of receipt	76.6%	92.2%	76%	91.9%	85.5%	87%
RAD to send 75% of RFAs within 40 days of report review	88%	88%	85%	86%	91%	87%
(b) (7)(E)	96.2%	96.9%	88%	100%	94%	100%
	25%	45%	100%	N/A*	83%	100%
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	96.67%	100%	97%	100%	91%	75%
(b) (7)(E)	100%	99%	100%	100%	100%	100%

* No PFARs circulated

Strategic Objective 4: Foster a Culture of High Performance

Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 17	FY 18	FY 19	FY 20	FY 21	FY22 (12/31/21)
RAD	Documents/ Transactions Coded	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828	4,873/ 63,983,177	4,512/ 134,373,851	478/ 14,830,878
	Documents/Pages Processed in Paper Automation/ Conversion System	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417	1,771/ 18,028	3,308/ 31,902	541/ 5,951
	Documents/Pages Reviewed	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699	89,525/ 73,526,421	102,219/ 187,079,514	15,184/ 8,336,969
	Letters sent	14,796	13,763	12,562	13,838	15,360	1,745
	Telephone calls handled	11,634	13,036	13,149	13,209	13,634	2,308
	Email inquiries handled	N/A	396	658	894	968	201
	Referrals	95	46	82	34	103	18
	AF Cases RTB/FD	163/168	95/23	262/93	100/204	384/260	18/135
	(b) (7)(E)						
Audit							
ADRO	(b) (7)(E)						
OAR							
OAR	Cases Received	29	8	37	20	34	4
	Cases Closed (FD)	32	10	36	2	42	8



(b) (3) (A)

(b) (3) (A)

(b) (3) (A)



Open Audits

As of 1/31/2022

(Confidential and Sensitive)

<u>Date of Last Action</u>	<u>Audit Manager</u>	<u>Report Track</u>
	Total - 2	

Proposed Final Audit Report Writing

2018	CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE	C00167320	12/16/2021	Pacious	B
				Total - 1	

Audits with the Commission

2018	DEMOCRACY ENGINE, INC., PAC	C00468314	ADRM	01/03/2022	Burgess	B
				Total - 1		

21 Open Audits

Legend

Track B	Audits with findings
Track C	Audits with <u>no</u> findings
IAR	Interim Audit Report
PAR	Preliminary Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report
Text	If text is red, the report has not been sent to OGC for a legal analysis



Open Audits
As of 1/31/2022
(Confidential and Sensitive)

Audit Caseload

Audit Manager	Number of Audits	Percent of Total Audits ¹
Burgess	4	19%
Morcomb	4	19%
Pacious	5	24%
Smith	5	24%
Yarbrough	3	14%
Totals	21	100%

¹ May not total 100% due to rounding



Open Audits

As of 1/31/2022

(Confidential and Sensitive)

Comments

2018

(b) (3) (A)

(b) (5)

(b) (3) (A)

(b) (5)

Connecticut Democratic State Central Committee

(b) (5)

Democracy Engine PAC

(b) (5)

(b) (3) (A)

(b) (5)

(b) (3) (A)

(b) (5)

Mike Braun for Indiana

(b) (5)

The UTE PAC

(b) (5)

(b) (3) (A)

(b) (5)

2020

1199 Service Employees Int'l Union Federal Political Action Fund

(b) (5)

(b) (3) (A)

(b) (5)

(b) (3) (A)

(b) (5)

(b) (3) (A)

(b) (5)

Illinois Republican Party - Federal

(b) (5)

(b) (3) (A)

(b) (5)

Latinos for America First

(b) (5)



Open Audits

As of 1/31/2022

(Confidential and Sensitive)

(b) (3) (A)
(b) (5)

Oklahoma Leadership Council

(b) (5)

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)

(b) (3) (A)
(b) (5)



Proposed Final Audit Report - Due Date

As of 1/31/2022

(Confidential and Sensitive)

____ (b) (7)(E)

(b) (5), (b) (3)

(b) (5), (b) (3)



Proposed Final Audit Report - Due Date

As of 1/31/2022

(Confidential and Sensitive)

21 Open Audits

Legend

IAR	Interim Audit Report
PAR	Preliminary Audit Report
DFAR	Draft Final Audit Report
ADRM	Audit Division Recommendation Memorandum
PFAR	Proposed Final Audit Report

(b) (7)(E)



ADR Civil Penalty Report

(For Closed Cases)

(Confidential and Sensitive)

Cases Opened in Fiscal Year: 10/01/2020 To: 09/30/2022

Period	Case#	Player	Civil Penalty Assessed	Payment Due Date	Civil Penalty Paid	Date Received	Balance	Non-Monetary Terms	Due Date	Date Complete
FY -2021	1000	International Brotherhood of Boilermakers Campaign Assistance Fund Creeden, William T.	\$5,140.00	09/14/2021	\$5,140.00	09/09/2021	\$0.00	Attend FEC seminar	09/11/2022	07/14/2021
	1001	South Dakota First Boysen, Sharon	\$790.00	09/30/2021	\$790.00	09/23/2021	\$0.00	Committee will file for termination	09/30/2021	10/01/2021
	1002	Kyriacopoulos, Janica Future Progress	\$12,400.00	08/27/2021	\$12,400.00	08/19/2021	\$0.00	Conduct internal education program for employees or staff Develop a FEC Compliance Manual	10/26/2021 10/26/2021	
	1003	American Freedom Fund Jones, Bill	\$2,500.00	09/05/2021	\$2,500.00	09/02/2021	\$0.00	Conduct internal education program for employees or staff	11/04/2021	
	1004	Crate, Bradley T. Van Drew for Congress Crate, Bradley T. Van Drew for Congress	\$4,415.00	09/27/2021	\$4,415.00	09/01/2021	\$0.00	Designate staff member as person responsible for FEC compliance	08/25/2022 08/25/2023	
	1005	Our Voice Our Vote Arizona PAC Johnson, Ryan	\$8,500.00	09/24/2021	\$8,500.00	09/24/2021	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	08/25/2022 11/23/2021	
	1007	MAD DOG PAC	\$2,100.00	10/08/2021	\$2,100.00	10/06/2021	\$0.00	Attend FEC seminar	09/08/2022	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		Taylor, Claude						Attend FEC seminar Develop a FEC Compliance Manual	09/08/2022 12/07/2021	
	1008	League of Southeastern Credit Unions Federal PAC Green, Brad	\$2,805.00	09/27/2021	\$2,805.00	08/27/2021	\$0.00	Attend FEC seminar	08/25/2022	07/14/2021
	1009	LIUNA Minnesota & North Dakota/Laborers' District Council of Minnesota & North Dakota Smith, Joel A.	\$4,300.00	08/27/2021	\$4,300.00	08/24/2021	\$0.00	Conduct internal education program for employees or staff Other	10/26/2021 10/26/2021	10/14/2021 10/14/2021
	1010	Satterfield, David Conservatives Acting Together Political Action Committee (CATPAC)	\$6,100.00	10/08/2021	\$6,100.00	11/19/2021	\$0.00	Conduct internal education program for employees or staff Other	12/07/2021 10/08/2021	
	1011	Satterfield, David Anna Paulina Luna for Congress	\$2,800.00	10/08/2021	\$2,800.00	12/06/2021	\$0.00	Conduct internal education program for employees or staff	12/07/2021	11/18/2021
	1012	Independent Alaska Orr, Susanna	\$2,800.00	10/04/2021	\$2,800.00	09/27/2021	\$0.00	Adopt and distribute policy regarding contributions to federal elections	10/04/2021	09/27/2021
	1014	JewsChoose4MoreYears Greenwald, Carol	\$3,000.00	08/13/2021	\$3,000.00	07/19/2021	\$0.00	Committee will file for termination	10/12/2021	07/19/2021
	1015	LaTurner for Senate Hill , DeAnn	\$8,400.00	10/20/2021	\$8,400.00	10/18/2021	\$0.00	Attend FEC seminar	09/15/2022	
	1016	Freedom Club Federal PAC Morgan, Richard G.	\$1,550.00	10/08/2021	\$1,550.00	09/16/2021	\$0.00	Attend FEC seminar	09/08/2022	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
								Other	10/08/2021	
	1018	Farhat, Elianne TakeAction MN Federal Fund	\$7,500.00	10/08/2021	\$7,500.00	09/27/2021	\$0.00	Attend FEC seminar	09/08/2022	
								Develop a FEC Compliance Manual	12/07/2021	11/01/2021
	1020	BLACK AMERICA'S POLITICAL ACTION COMMITTEE Ekam, Margaret	\$2,725.00	10/20/2021	\$2,725.00	09/23/2021	\$0.00	Attend FEC seminar	09/20/2022	09/29/2021
	1022	Rozansky, Adam CLUB FOR GROWTH ACTION	\$14,500.00	10/01/2021	\$14,500.00	09/08/2021	\$0.00	Attend FEC seminar	09/01/2022	
								Other	10/01/2021	10/01/2021
	1023	Rural Colorado United Autobee, George	\$3,800.00	10/29/2021	\$3,800.00	10/29/2021	\$0.00	Attend FEC seminar	09/29/2022	
								Develop a FEC Compliance Manual	11/28/2021	11/24/2021
	1024	Committee to Re-Elect the President Bennett, Jason	\$2,150.00	09/24/2021	\$2,150.00	09/28/2021	\$0.00	Committee will file for termination	09/24/2021	09/29/2021
	1025	Poder NC Action	\$6,575.00	10/22/2021	\$6,575.00	10/25/2021	\$0.00	Attend FEC seminar	12/15/2021	12/02/2021
								Develop a FEC Compliance Manual	12/15/2021	12/02/2021
	1028	International Longshore and Warehouse Union -- Political Action Fund Ferris, Edwin R.	\$2,400.00	10/22/2021	\$2,400.00	09/28/2021	\$0.00	Develop a FEC Compliance Manual	12/15/2021	12/13/2021
	1029	Big Sky 55+	\$3,350.00	10/22/2021	\$3,350.00	10/22/2021	\$0.00	Attend FEC seminar	09/22/2022	11/17/2021
	1036	MI Planned Parenthood Votes Keserich, John	\$12,150.00	10/22/2021	\$12,150.00	11/23/2021	\$0.00	Attend FEC seminar	09/22/2022	
								Develop a FEC Compliance Manual	12/22/2021	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	920	Pulaski, Art Million More Voters, Sponsored by the California Labor Federation, AFL-CIO	\$5,450.00	05/15/2021	\$5,450.00	05/07/2021	\$0.00	Committee will file for termination	07/14/2021	06/02/2021
	935	South Dakota Democratic Party Committee Bunger, Marcia	\$7,200.00	08/26/2021	\$7,200.00	08/25/2021	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual Develop RFAI tracking & response procedures	01/23/2022 10/28/2021 08/26/2021	
	943	Cramer, Thomas A. Democratic Advancement PAC	\$8,815.00	06/08/2022				Attend FEC seminar Develop RFAI tracking & response procedures File amended reports	06/05/2022 12/06/2021 12/06/2021	
	945	WFP IE Committee Boland, Mike	\$12,000.00	10/14/2021	\$12,000.00	11/12/2021	\$0.00	Attend FEC seminar Conduct & certify internal audit/reconciliation Develop a FEC Compliance Manual Develop RFAI tracking & response procedures	11/13/2021 09/14/2022 09/14/2023 11/13/2021 10/14/2021	12/08/2021 11/22/2021
	955	Varban, Alex Americans for Prosperity Action, Inc.(AFP Action)	\$18,350.00	02/18/2021	\$18,350.00	02/09/2021	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	01/19/2022 04/19/2021	04/21/2021 03/08/2021
	957	Beto for Texas (FKA Beto O'Rourke for Congress Committee)	\$5,900.00	06/21/2021	\$5,900.00	06/03/2021	\$0.00	Committee will file for termination	08/21/2021	07/15/2021

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		Pulido, Gwendolyn L.						Committee will file for termination	08/21/2021	07/15/2021
	960	Campbell, Tom Tom Campbell for North Dakota	\$2,250.00	12/31/2020	\$2,250.00	02/09/2021	\$0.00	Committee will file for termination	02/28/2021	02/11/2021
	961	DNC Services Corp / Democratic National Committee Derrough, William Q.	\$10,500.00	02/18/2021	\$10,500.00	01/28/2021	\$0.00	Attend FEC seminar	01/19/2022	05/26/2021
	963	Communities for a New California C4	\$6,400.00	01/14/2022	\$6,050.00	12/08/2021	\$350.00	Attend FEC seminar Other	01/19/2022 02/18/2021	01/20/2022 02/17/2021
	964	Case Action Fund	\$6,650.00	10/14/2020	\$6,650.00	10/14/2020	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	01/24/2022 04/26/2021	05/27/2021 04/12/2021
	965	VoteVets.org Action Fund	\$6,250.00	02/25/2021	\$6,250.00	02/10/2021	\$0.00	Attend FEC seminar	01/24/2022	02/09/2022
	966	Credit Suisse Securities (USA) LLC PAC Guarin, Cecilia	\$1,625.00	06/14/2021	\$1,625.00	05/17/2021	\$0.00	Attend FEC seminar Other	04/15/2022 06/14/2021	01/05/2021 02/01/2021
	967	Marston, Christopher "Chris" M. Liberty for Us Super PAC	\$17,400.00	10/12/2021	\$17,400.00	05/06/2021	\$0.00	Attend FEC seminar Conduct & certify internal audit/reconciliation Develop a FEC Compliance Manual	04/15/2022 05/15/2022 07/14/2021	07/14/2021 06/30/2021
	968	Friends of John Delaney Nordberg, Edward P.	\$5,000.00	02/18/2021	\$5,000.00	01/26/2021	\$0.00	Attend FEC seminar	01/19/2022	
	970	The 2016 Committee Saracino, William	\$10,000.00	03/20/2021	\$10,000.00	03/05/2021	\$0.00	File amended reports	03/20/2021	03/03/2021
	972	Canegata, John M.	\$2,445.00	03/16/2021	\$2,445.00	03/15/2021	\$0.00	Adopt and distribute policy regarding contributions to federal elections	03/16/2021	05/16/2021

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		VIGOP (Virgin Islands Republican Party)						Adopt and distribute policy regarding contributions to federal elections	03/16/2021	05/16/2021
								Develop a FEC Compliance Manual	05/17/2021	05/16/2021
	973	Phillips, Robert GRIT PAC	\$1,900.00	02/18/2021	\$1,900.00	10/05/2020	\$0.00	Attend FEC seminar	01/19/2022	07/14/2021
								Other	02/18/2021	09/18/2020
	974	Kilgore, Paul SEAL PAC Supporting Electing American Leaders PAC	\$2,700.00	03/16/2021	\$2,700.00	03/11/2021	\$0.00	Adopt and maintain guidelines governing contributions to federal elections	02/16/2021	03/16/2021
	976	Free Forever Political Action Committee Krason, Patrick	\$5,500.00	03/18/2021				Attend FEC seminar	02/16/2022	
								Committee will file for termination	05/17/2021	
	977	Perfect Together PAC, Inc. Mondella, Theresa	\$1,300.00	03/19/2021	\$1,300.00	04/07/2021	\$0.00	Committee will file for termination	04/17/2021	04/09/2021
	978	Kilgore, Paul Protect Freedom Political Action Committee	\$2,125.00	03/18/2021	\$2,125.00	04/08/2021	\$0.00	Attend FEC seminar	02/16/2022	
	981	ACTBLUE Hill, Erin	\$3,300.00	03/26/2021	\$3,300.00	03/18/2021	\$0.00	Conduct & certify internal audit/reconciliation	05/25/2021	03/25/2021
								Other	03/26/2021	03/25/2021
	984	Marston, Christopher "Chris" M. American Values PAC	\$2,250.00	05/07/2021	\$2,250.00	04/16/2021	\$0.00	Attend FEC seminar	04/07/2022	03/24/2021
								Develop a FEC Compliance Manual	07/06/2021	06/30/2021

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
	985	PROTECTING OUR VOTE PAC Woodard, Kimberly A.	\$3,650.00	05/14/2021	\$3,650.00	05/13/2021	\$0.00	Conduct internal education program for employees or staff	07/13/2021	06/28/2021
								Other	05/14/2021	05/14/2021
	986	Democratic Progress Carson, Jeffrey	\$4,600.00	05/07/2021	\$4,600.00	04/20/2021	\$0.00	Attend FEC seminar	04/07/2022	08/17/2021
								Develop a FEC Compliance Manual	07/06/2021	06/15/2021
	987	Guernsey, Sherwood RURAL FREEDOM NETWORK	\$2,275.00	04/24/2021	\$2,275.00	03/31/2021	\$0.00	Conduct internal education program for employees or staff	06/23/2021	05/03/2021
	989	Hometown Values PAC Helgesen, Francis Xavier	\$2,700.00	07/08/2021	\$2,700.00	07/16/2021	\$0.00	Committee will file for termination		
	991	Leon County Democratic Executive Committee Carpenter, Kevin Richard	\$800.00	12/16/2021	\$800.00	07/09/2021	\$0.00	Attend FEC seminar	06/16/2022	
								Designate Compliance Specialist	07/16/2021	07/12/2021
	992	Midwest Victory PAC Mauro, Nick J.	\$1,375.00	04/23/2021	\$1,375.00	04/12/2021	\$0.00	Committee will file for termination	04/27/2021	04/27/2021
	993	Alliance for a Better Minnesota Federal PAC Davis, Joe	\$11,535.00	08/27/2021	\$11,535.00	09/03/2021	\$0.00	Attend FEC seminar	07/28/2022	01/12/2022
	996	Glaze, Kayla Louisiana Legacy PAC	\$1,275.00	07/09/2021	\$1,275.00	07/09/2021	\$0.00	Attend FEC seminar	06/09/2022	
	997	VanWyhe, Kimberly Denali Leadership PAC	\$5,150.00	07/23/2021	\$5,150.00	07/30/2021	\$0.00	Attend FEC seminar	06/23/2022	07/14/2021
								Develop a FEC Compliance Manual	09/21/2021	07/29/2021
	998	Patriot's Fund	\$5,600.00	07/09/2021	\$5,600.00	07/09/2021	\$0.00	Attend FEC seminar	06/09/2022	

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		Greenlee, Scott						Attend FEC seminar Develop a FEC Compliance Manual	06/09/2022 09/07/2021	09/07/2021
Sub-Total : FY -2021			\$307,020.00		\$292,355.00		\$350.00			
FY -2022	1021	Keep America America Action Fund Willard, Phil	\$4,700.00	11/07/2021	\$4,700.00	11/10/2021	\$0.00	Attend FEC seminar	10/08/2022	
	1026	Deane, Shawnda Americans for Decency and Democracy	\$3,775.00	11/15/2021	\$3,775.00	12/17/2021	\$0.00	Develop and enforce internal controls	11/15/2021	
	1027	Stronger Foundations, Inc. Dipalma, Andrew	\$6,800.00	11/19/2021	\$6,800.00	11/22/2021	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	10/20/2022 01/18/2022	
	1030	Community Change Voters Berman, Jeff	\$11,200.00	11/12/2021	\$11,200.00	11/15/2021	\$0.00	Attend FEC seminar Other	10/13/2022 02/10/2022	
	1031	OpenSourceMT Rosenzweig, Scott	\$2,550.00	11/26/2021	\$2,550.00	11/17/2021	\$0.00	Attend FEC seminar	10/27/2022	
	1032	Change Campaign Super PAC Green, Adam	\$7,850.00	12/17/2021				Conduct internal education program for employees or staff	02/15/2022	
	1033	Texas Organizing Project Political Action Halvorson, Steve	\$8,350.00	12/10/2021	\$8,350.00	12/06/2021	\$0.00	Attend FEC seminar	02/11/2022	01/20/2022
	1034	Boles, Jason D. Stop Socialism Now PAC	\$3,200.00	12/10/2021	\$3,200.00	11/23/2021	\$0.00	Attend FEC seminar	11/10/2022	
	1035	May, Jennifer	\$2,750.00	12/31/2021	\$2,750.00	12/22/2021	\$0.00	Attend FEC seminar	12/01/2022	12/08/2021

<i>Period</i>	<i>Case#</i>	<i>Player</i>	<i>Civil Penalty Assessed</i>	<i>Payment Due Date</i>	<i>Civil Penalty Paid</i>	<i>Date Received</i>	<i>Balance</i>	<i>Non-Monetary Terms</i>	<i>Due Date</i>	<i>Date Complete</i>
		Ditch Fund						Attend FEC seminar	12/01/2022	12/08/2021
	1037	Petterson, Jay Sharice for Congress	\$2,475.00	12/17/2021	\$2,475.00	12/08/2021	\$0.00	Develop a FEC Compliance Manual	02/18/2022	01/04/2022
	1039	Slaughter, Christel GARRET GRAVES FOR CONGRESS	\$2,700.00	12/10/2021	\$2,700.00	11/23/2021	\$0.00	Attend FEC seminar	11/10/2022	
	1040	Teresa for All Castillo, Alvino	\$5,600.00	11/26/2021	\$5,600.00	11/26/2021	\$0.00	Attend FEC seminar Develop a FEC Compliance Manual	10/27/2022 01/25/2022	
	1041	Gair, Vernon PACRONYM	\$5,575.00	12/30/2021	\$5,575.00	12/03/2021	\$0.00	Committee will file for termination	01/24/2022	
	1042	CASA in Action PAC Guzman, Melissa	\$6,100.00	01/17/2022				Conduct internal education program for employees or staff	03/15/2022	
	1043	Action For A Progressive Future	\$9,950.00	12/24/2021	\$9,950.00	12/01/2021	\$0.00	Attend FEC seminar	11/24/2022	
Sub-Total : FY -2022			\$83,575.00		\$69,625.00		\$0.00			
Grand Total :			\$390,595.00		\$361,980.00		\$350.00			



AF Performance Goals

Print Date: January 31, 2022

Selected Parameters:

Office: Both

Start Date: 10/01/2021

End Date: 12/31/2021

*Exception: YES



AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
Processed						
2021	Q3	H_S_P	N	10/15/2021	11/22/2021	
		Total AF Reports Processed	1			
		Average Processing Days	38.00			
		Percentage to Goal	100.00%			

Processed - No committees

					Action Date	(b) (7)(E)
2021	12SG	AUTH	Y	10/21/2021	12/01/2021	
2021	12SP	AUTH	Y	10/21/2021	12/01/2021	
2021	M10	P_UNAUTH	N	10/20/2021	12/01/2021	
2021	M10	P_UNAUTH	Y	10/20/2021	12/01/2021	
2021	Q3	H_S_P	Y	10/15/2021	11/16/2021	
2021	M9	P_UNAUTH	N	09/20/2021	11/02/2021	
		Total AF Reports Processed-No Committees	6			
		Average Processing Days	40.17			
		Percentage to Goal	100.00%			



AF Performance Goals

(Confidential and Sensitive)

Total AF Reports 7

Average Processing Days 39.86

(b) (7)(E)

Percentage to Goal 100.00%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters
RAD returns any processed-no committees run where the update_date falls within the Start Date and End Date parameters
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
(b) (3) (A)							
2020	48H	4221	C00742528	08/24/2021	12/09/2021	107	N
2020	48H	4224	C00607200	09/20/2021	11/04/2021	45	Y
2020	48H	4225	C00711572	09/01/2021	10/21/2021	50	Y

Total Challenges Processed 4

Average Processing Days 60.75

Total Reports Processed within 60 Days 3

Percentage to Goal 75.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

Administrative Fine Program
Penalties Assessed and % Collected

	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22 (12/31/21)
Total Fines Assessed	\$133,758	\$446,718	\$131,164	\$318,495	\$522,874	\$968,505	\$421,233

(b) (7)(E)