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Federal Election Commission  
Washington, DC 20463

**MEMORANDUM**

TO: Gregory R. Baker  
Deputy General Counsel of Administration  
Office of General Counsel

FROM: Lynn M. Fraser *LMF*  
Director, ADR Office

Krista J. Roche *KJR*  
Assistant Director, ADR Office

CC: Patricia C. Orrock  
Chief Compliance Officer (w/o documents)

Jeff Jordan, Docket Leader  
Complaints Examination & Legal Administration (w/o documents)

Daniel A. Petalas  
Associate General Counsel for Enforcement (w/o documents)

Kathleen Guith  
Deputy Associate General Counsel for Enforcement (w/o documents)

Deborah Chacona  
Assistant Staff Director, Reports Analysis Division (w/o documents)

SUBJECT: ADR 731 (RAD 14L-25)  
Warriors for Liberty and Scott B. Mackenzie, Treasurer

DATE: September 30, 2014

Pursuant to Commission procedures to refer a matter to the Office of General Counsel if the Committee does not elect to participate in the ADR process, enclosed please find the referral of the Warriors for Liberty and Scott B. Mackenzie, Treasurer (Respondents or the Committee). The ADR Office refers this matter to the Office of General Counsel for appropriate enforcement action.

The Reports Analysis Division referred Respondents for failing to disclose all financial activity. The Committee filed the original 2013 Year-End Report on January 31, 2014 disclosing no receipts, no disbursements, and no debts. On February 21, 2014, the Committee filed an Amended 2013 Year-End Report disclosing \$241,026.52 in receipts, \$225,995.28 in disbursements, and \$125,519.20 in debts.

In a Miscellaneous Electronic Statement (Form 99) filed on May 28, 2014, the Committee stated that when a new Treasurer assumed responsibility in February 2014, reports were amended "as the previous Treasurer was not experienced in filing these reports and had difficulty using the FECfile software."

The ADR Office records now reflect ADR 731 (RAD 14L-25) as closed.

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: July 10, 2014

ANALYST: Maureen Benitz

I. COMMITTEE:

Warriors for Liberty  
C00545087  
Scott B. MacKenzie, Treasurer  
(02/06/14 – Present)  
Mary Jo Lalor, Treasurer  
(5/22/13-2/5/14)  
2776 S. Arlington Mill Dr. #806  
Arlington, VA 22206

II. RELEVANT STATUTE:

2 U.S.C. § 434(b)  
11 CFR § 104.3

III. BACKGROUND:

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

Warriors for Liberty (“the Committee”) amended its 2013 Year-End Report to disclose additional receipts of \$241,026.52, additional disbursements of \$225,995.28 and additional debts of \$125,519.20 that were not disclosed in the original report (Attachment 2).

On January 31, 2014, Kieran Lalor, the Committee’s custodian of records, called the Reports Analysis Division (RAD) Analyst to find out which form the Committee needed to submit. Mr. Lalor stated that the Committee did not have any activity during the 2013 Year-End reporting period. The Analyst advised Mr. Lalor to file the Form 3X and send it using registered or certified mail so that it could be tracked (Attachment 3).

Subsequently, on January 31, 2014, the Committee filed the original 2013 Year-End Report covering the period from July 1, 2013 through December 31, 2013. The report disclosed no receipts on Line 11(a)(i) (Itemized Contributions from Individuals) and Line 11(a)(ii) (Unitemized Contributions from Individuals) of the Detailed Summary Page. The report also disclosed no disbursements on Line 21(b) (Other Federal Operating Expenditures) and Line 22 (Transfers to Affiliated/Other Party Committees) of the Detailed Summary Page. Finally, the report also disclosed no debts on Line 10 (Debts and Obligations Owed by the Committee) of the Summary Page (Images 14031173087-89).

On February 21, 2014, the Committee filed an Amended 2013 Year-End Report. The report disclosed \$58,460.00 in receipts on Line 11(a)(i) and \$182,566.52 in receipts on Line 11(a)(ii) of the Detailed Summary Page, a total increase in receipts of \$241,026.52 from the original report. The report also disclosed \$211,995.28 in disbursements on Line 21(b) and \$14,000.00 in disbursements on Line 22 of the Detailed Summary Page, a total increase in disbursements of \$225,995.28 from the original report. Finally, the report also disclosed \$125,519.20 in debts on Line 10 of the Summary Page, a total increase in debts of \$125,519.20 from the original report (Images 14940533882-84, Attachment 2).

On April 14, 2014, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2013 Year-End Report, received February 21, 2014. The RFAI requested clarification regarding the substantial increase in receipts, disbursements and debts disclosed on the Amended 2013 Year-End Report that were not disclosed on the original filing (Image 14330048433).

On May 20, 2014, the RAD Analyst left a voicemail message for Scott MacKenzie, the Committee's Treasurer, regarding the RFAI referencing the increased activity that was questioned on the Amended 2013 Year-End Report. The Analyst advised filing a Miscellaneous Electronic Submission ("Form 99") if the Committee wished to provide any further information. The Analyst stated that this matter could be forwarded to another office for further Commission action and encouraged the Treasurer to return her call (Attachment 3).

On May 22, 2014, Mr. MacKenzie called in response to the RAD Analyst's phone message. He stated that he did not see the RFAI referencing the Amended 2013 Year-End Report, received on February 21, 2014. He also stated that he would file a response by May 26, 2014 (Attachment 3).

On May 28, 2014, the Committee filed a Form 99 which stated, in part:

"In early February 2014, representatives of Warriors for Liberty were looking for someone to assume the role of Treasurer of the Political Action Committee and replace the original Treasurer. An amended Statement of Organization (Form 1) was filed on February 6th, listing Scott B. Mackenzie as the new Treasurer. The first order of business was

to amend previously filed FEC Disclosure Reports as the previous Treasurer was not experienced in filing these reports and had difficulty using the FECfile software.

On February 21st, an amended FEC Report was filed that disclosed an increase in receipts totaling 241,026.52; an increase in disbursements totaling \$225,995.28; and an increase in debts and obligations owed to one or more vendors totaling \$125,519.20 from the amounts disclosed on the original report.

There were nearly 7,000 transactions, most from the committee's small donor program and the numbers just overwhelmed the previous Treasurer, who although well-meaning, realized that a change was critically needed.

The amended report details all the activity taking place during the reporting period" (Image 14961229326).

To date, no further communication has been received from the Committee regarding this matter.

O-Index (2013-2014)  
 Cmte. ID: C00545087 Cmte. Name: WARRIORS FOR LIBERTY  
 Treasurer Name: MACKENZIE, SCOTT B Address: 2776 S ARLINGTON MILL DR #806, ARLINGTON, VA 22206  
 Cmte. Type: N (NON-QUALIFIED NON-PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER

Form Tp	Rpt Tp	Alt	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			4/14/2014	1	14960672493										
MS-T			5/28/2014	1	14941271987										
MS-T			5/28/2014	1	14961229326										
RQ1	MY	N	6/4/2013	2	13330032962		6/4/2013								
RQ2	MY	N	4/11/2014	2	14330048367	1/1/2013	6/30/2013	4/11/2014							
RQ2	YE	N	4/14/2014	2	14330048433	7/1/2013	12/31/2013	4/14/2014							
F3X	MY	N	8/2/2013	6	13031103987	5/10/2013	8/30/2013		\$0	\$0	\$0	\$0			\$0
F3XN	MY	N	2/21/2014	6	14940533781	1/1/2013	6/30/2013		\$0	\$14,241	\$10,218	\$4,222			\$0
F3X	YE	N	1/31/2014	7	14031173086	7/1/2013	12/31/2013			\$0	\$0				
F3XN	YE	N	2/21/2014	16	14940533881	7/1/2013	12/31/2013		\$4,222	\$241,026	\$225,995	\$19,254	\$125,519		\$125,519
F3XN	Q1	N	4/14/2014	40	14960670625	1/1/2014	3/31/2014		\$19,254	\$72,615	\$84,588	\$7,280	\$169,167	\$2,970	\$172,137
F1	N		2/8/2014	6	14031181823										
F1	N		5/22/2013	5	13031071694										
F1	N		8/2/2013	5	13031103987										
F1A	A		2/21/2014	4	14960479837										
F1A	A		4/14/2014	4	14960672723										
Totals										\$328,083	\$320,802				

O-Index (2011-2012)  
 Cmte. ID: C00545087 Cmte. Name: WARRIORS FOR LIBERTY  
 Treasurer Name: MACKENZIE, SCOTT B Address: 2776 S ARLINGTON MILL DR #806, ARLINGTON, VA 22206  
 Cmte. Type: N (NON-QUALIFIED NON-PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER

Form Tp	Rpt Tp	Alt	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
No records were found for this cycle.															

O-Index (2009-2010)  
 Cmte. ID: C00545087 Cmte. Name: WARRIORS FOR LIBERTY  
 Treasurer Name: MACKENZIE, SCOTT B Address: 2776 S ARLINGTON MILL DR #806, ARLINGTON, VA 22206  
 Cmte. Type: N (NON-QUALIFIED NON-PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER

Form Tp	Rpt Tp	Alt	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
No records were found for this cycle.															

**Warriors for Liberty (C00545087)**

Additional Receipts by Line Number

2013 Year-End Report/Amended 2013 Year-End Report

Report Line	2013 Year-End Report (Image 14031173088)	Amended 2013 Year-End Report, received 2/21/14 (Image 14940533883)	Variance Amount
Line 11(a)(i): Itemized Contributions from Individuals	\$0.00	\$58,460.00	\$58,460.00
Line 11(a)(ii): Unitemized Contributions from Individuals	\$0.00	\$182,566.52	\$182,566.52
		<b>Total Variance:</b>	<b>\$241,026.52</b>

Additional Disbursements by Line Number

2013 Year-End Report/Amended 2013 Year-End Report

Report Line	2013 Year-End Report (Image 14031173089)	Amended 2013 Year-End Report, received 2/21/14 (Image 14940533884)	Variance Amount
Line 21(b): Other Federal Operating Expenditures	\$0.00	\$211,995.28	\$211,995.28
Line 22: Transfers to Affiliated/Other Party Committees	\$0.00	\$14,000.00	\$14,000.00
		<b>Total Variance:</b>	<b>\$225,995.28</b>

**Warriors for Liberty (C00545087)**

Amended 2013 Year-End Report, received 2/21/14 (14940533881)

Overview of New Debts Incurred

Vendor	Outstanding Balance	Amount Incurred	Payments	Increase in Debt Incurred
BASE CONNECT INC	\$0.00	\$29,549.17	\$9,426.11	\$20,123.06
CAPITAL CAGING	\$0.00	\$3,715.37	\$2,813.36	\$902.01
COLORTREE GROUP	\$0.00	\$8,950.27	\$0.00	\$8,950.27
CONSOLIDATED MAILING SERVICES INC	\$0.00	\$61,834.89	\$25,235.74	\$36,599.15
DONOR BUREAU	\$0.00	\$2,079.09	\$762.76	\$1,316.33
INTEGRAM	\$0.00	\$11,237.55	\$4,818.87	\$6,418.68
LEGACY LIST MARKETING INC	\$0.00	\$56,209.70	\$5,000.00	\$51,209.70
Total				\$125,519.20