

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: September 12, 2023

ANALYST: Clyde Hinton

I. COMMITTEE: Great Lakes PAC  
C00375584  
Tim Kaltenbach, Treasurer  
P.O. Box 1295  
East Lansing, MI 48826

TYPE OF COMMITTEE: Nonconnected - Leadership PAC<sup>1</sup>

II. REGISTRATION DATE: March 28, 2002

III. MULTICANDIDATE STATUS: Qualified

IV. BACKGROUND:

The Committee was sent nineteen (19) Requests for Additional Information (RFAIs) for reporting errors including excessive, prohibited, and other impermissible contributions or transfers, mathematical discrepancies, failure to provide supporting schedules, failure to properly itemize contributions from individuals, and failure to properly itemize contributions and transfers to political committees.

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<sup>1</sup> The Leadership PAC sponsor for this committee is Debbie Stabenow.

**DATE:** September 12, 2023

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**REPORTS ANALYSIS DIVISION AUDIT REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE**

- I. COMMITTEE:** Great Lakes PAC  
C00375584  
Tim Kaltenbach, Treasurer  
P.O. Box 1295  
East Lansing, MI 48826
- TYPE OF COMMITTEE:** Nonconnected – Leadership PAC
- II. REGISTRATION:** March 28, 2002
- III. MULTICANDIDATE STATUS:** Qualified
- IV. SUMMARY OF RFAI RESPONSES:** The Committee did not respond, responded inadequately, or responded late to ten (10) of nineteen (19) RFAIs sent in the 2021-2022 election cycle.
- V. SUMMARY OF AUDIT POINTS BY STANDARD:**

STANDARD	STANDARD DESCRIPTION	POINT(S) ASSIGNED	REPORT(S)	DESCRIPTION OF VIOLATION FOR WHICH AUDIT POINT(S) WAS ASSESSED	COMMITTEE RESPONSE TO RFAI
5	Excessive, Prohibited, and Other Impermissible Contributions or Transfers		2022 YE	Schedule A supporting Line 11(c) disclosed the receipt of an excessive contribution totaling \$5,000.00, or 22.2% of the Committee's total contributions from other political committees. This contribution was received from one (1) federal political committee.	LIR (5/9/23)

6	Mathematical Discrepancies		Amended 2021 M3, received 2/7/22	<p>The Committee's report contained mathematical discrepancies totaling \$3,665.32, as detailed below:</p> <p>The report contained mathematical discrepancies on several lines in Column B totaling \$1,832.66.</p> <p>Line 8, Column A, \$162,266.64, of the Summary Page did not equal Line 8, Column B, \$164,099.30, of the Summary Page, a discrepancy of \$1,832.66.</p>	NR
6	Mathematical Discrepancies		Amended 2021 M4, received 2/7/22	<p>The Committee's report contained mathematical discrepancies totaling \$1,832.66, as detailed below:</p> <p>The report contained mathematical discrepancies on several lines in Column B totaling \$167.34.</p> <p>Line 8, Column A, \$232,241.28, of the Summary Page did not equal Line 8, Column B, \$233,906.60, of the Summary Page, a discrepancy of \$1,665.32.</p>	NR
6	Mathematical Discrepancies		Amended 2021 M5, received 2/7/22	The report contained mathematical discrepancies on several lines in Column B totaling \$1,665.32.	NR
6	Mathematical Discrepancies		Amended 2021 M7, received 8/10/21	The report contained mathematical discrepancies on several lines in Column B totaling \$5,000.00.	LAR (5/22/23)
6	Mathematical Discrepancies		2021 M9	<p>The Committee's report contained mathematical discrepancies totaling \$10,000.00, as detailed below:</p> <p>The beginning cash balance, \$310,232.91, was greater than the ending cash balance on the previous report, \$305,232.91, a discrepancy of \$5,000.00.</p> <p>Line 8, Column A, \$367,127.79, of the Summary Page did not equal Line 8, Column B, \$362,127.79, of the Summary Page, a discrepancy of \$5,000.00.</p>	LAR (12/13/21)

6	Mathematical Discrepancies		2021 M11	<p>The Committee's report contained mathematical discrepancies totaling \$50,000.00, as detailed below:</p> <p>The report contained mathematical discrepancies on several lines in Column B totaling \$35,000.00.</p> <p>The beginning cash balance, \$376,558.51, was less than the ending cash balance on the previous report, \$386,558.51, a discrepancy of \$10,000.00.</p> <p>Line 8, Column A, \$396,354.04, of the Summary Page did not equal Line 8, Column B, \$401,354.04, of the Summary Page, a discrepancy of \$5,000.00.</p>	IR (1/1/22)
6	Mathematical Discrepancies		2021 M12	Line 8, Column A, \$405,142.59, of the Summary Page did not equal Line 8, Column B, \$410,142.59, of the Summary Page, a discrepancy of \$5,000.00.	IR (1/30/22)
6	Mathematical Discrepancies		2021 YE	Line 8, Column A, \$532,948.87, of the Summary Page did not equal Line 8, Column B, \$537,948.87, of the Summary Page, a discrepancy of \$5,000.00.	IR (5/17/22)
7	Failure to Provide Supporting Schedules		Amended 2021 M7, received 8/10/21	The Committee's report disclosed additional receipts totaling \$22,500.00 on Schedule A supporting Lines 11(a)(i) and 11(c), resulting in an increase of more than 5% and \$10,000.00 over the original report.	IR (10/4/21)
8	Failure to Properly Itemize Contributions from Individuals		2021 M4	Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 10 of 28, or 35.7%, of the contributions from individuals that require itemization.	LAR (2/7/22)
10	Failure to Properly Itemize Contributions and Transfers to Political Committees		Amended 2021 M4, received 2/7/22	Schedule B supporting Line 23 failed to disclose the office sought for contributions to four (4) federal candidates totaling \$25,000.00.	NR
10	Failure to Properly Itemize Contributions and Transfers to Political Committees		2022 YE	Schedule B supporting Line 23 failed to disclose the office sought for contributions to four (4) federal candidates totaling \$25,000.00.	LIR (5/9/23)
	<b>TOTAL</b>				

**Response Codes**

IR – Inadequate Response

LAR – Late Adequate Response

LIR – Late Inadequate Response

NR – No Response

**Great Lakes PAC (C00375584)**  
ADRO Referral Response Guide

Excessive, Prohibited, and Other Impermissible Contributions or Transfers

Report	RFAI Due Date	Response Date(s)	Response Code	Reason for code
2022 YE	5/8/23	5/9/23	LIR	<p>Schedule A supporting Line 11(c) disclosed the receipt of an excessive contribution totaling \$5,000.00, or 22.2% of the Committee's total contributions from other political committees. This contribution was received from one (1) federal political committee.</p> <p>The Committee filed an Amended 2022 YE on 5/9/23 that failed to adequately address the issue. The excessive amount was not refunded or transferred out, and the Committee did not disclose corrective action or provide further clarification.</p>

Mathematical Discrepancies

Report	RFAI Due Date	Response Date(s)	Response Code	Reason for code
Amended 2021 M3, received 2/7/22	6/22/22	N/A	NR	<p>The Committee's report contained mathematical discrepancies totaling \$3,665.32, as detailed below:</p> <p>The report contained mathematical discrepancies on several lines in Column B totaling \$1,832.66.</p> <p>Line 8, Column A, \$162,266.64, of the Summary Page did not equal Line 8, Column B, \$164,099.30, of the Summary Page, a discrepancy of \$1,832.66.</p> <p>The Committee failed to respond to the RFAI.</p>
Amended 2021 M4, received 2/7/22	6/22/22	N/A	NR	<p>The Committee's report contained mathematical discrepancies totaling \$1,832.66, as detailed below:</p> <p>The report contained mathematical discrepancies on several lines in Column B totaling \$167.34.</p> <p>Line 8, Column A, \$232,241.28, of the Summary Page did not equal Line 8, Column B, \$233,906.60, of the Summary Page, a discrepancy of \$1,665.32.</p> <p>The Committee failed to respond to the RFAI.</p>
Amended 2021 M5, received 2/7/22	6/22/22	N/A	NR	<p>The report contained mathematical discrepancies on several lines in Column B totaling \$1,665.32.</p> <p>The Committee failed to respond to the RFAI.</p>
Amended 2021 M7, received 8/10/21	10/4/21	5/22/23	LAR	<p>The report contained mathematical discrepancies on several lines in Column B totaling \$5,000.00.</p> <p>The Committee filed an Amended 2021 M7 on 5/22/23 that corrected the mathematical discrepancies.</p>

2021 M9	11/18/21	12/13/21	LAR	<p>The Committee's report contained mathematical discrepancies totaling \$10,000.00, as detailed below:</p> <p>The beginning cash balance, \$310,232.91, was greater than the ending cash balance on the previous report, \$305,232.91, a discrepancy of \$5,000.00.</p> <p>Line 8, Column A, \$367,127.79, of the Summary Page did not equal Line 8, Column B, \$362,127.79, of the Summary Page, a discrepancy of \$5,000.00.</p> <p>The Committee filed an Amended 2021 M9 on 12/13/21 that corrected the mathematical discrepancies.</p>
2021 M11	1/3/22	1/1/22	IR	<p>The report contained mathematical discrepancies on several lines in Column B totaling \$50,000.00.</p> <p>The report contained mathematical discrepancies on several lines in Column B totaling \$35,000.00.</p> <p>The beginning cash balance, \$376,558.51, was less than the ending cash balance on the previous report, \$386,558.51, a discrepancy of \$10,000.00.</p> <p>Line 8, Column A, \$396,354.04, of the Summary Page did not equal Line 8, Column B, \$401,354.04, of the Summary Page, a discrepancy of \$5,000.00.</p> <p>The Committee filed an Amended 2021 M11 on 1/1/22 that failed to adequately address the issues.</p>
2021 M12	2/7/22	1/30/22	IR	<p>Line 8, Column A, \$405,142.59, of the Summary Page did not equal Line 8, Column B, \$410,142.59, of the Summary Page, a discrepancy of \$5,000.00.</p> <p>The Committee filed an Amended 2021 M12 on 1/30/22 that failed to adequately address the issue.</p>
2021 YE	5/17/22	5/17/22	IR	<p>Line 8, Column A, \$532,948.87, of the Summary Page did not equal Line 8, Column B, \$537,948.87, of the Summary Page, a discrepancy of \$5,000.00.</p> <p>The Committee filed an Amended 2021 YE on 5/17/22 that failed to adequately address the issue.</p>

#### Failure to Provide Supporting Schedules

Report	RFAI Due Date	Response Date(s)	Response Code	Reason for code
Amended 2021 M7, received 8/10/21	10/4/21	10/4/21	IR	<p>The Committee's report disclosed additional receipts totaling \$22,500.00 on Schedule A supporting Lines 11(a)(i) and 11(c), resulting in an increase of more than 5% and \$10,000.00 over the original report.</p> <p>The Committee filed an Amended 2021 M7 on 10/4/21 and provided memo text stating, in part, "The receipts totaling \$22,500 were added in after the original report due to the contributions being incorrectly filed."</p>

## Failure to Properly Itemize Contributions from Individuals

Report	RFAI Due Date	Response Date(s)	Response Code	Reason for code
2021 M4	6/3/21	2/7/22	LAR	<p>Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 10 of 28, or 35.7%, of the contributions from individuals that require itemization.</p> <p>The Committee filed an Amended 2021 M4 on 2/7/22 that reduced the amount of inadequate identification to 9 of 28, or 32.1%, of the contributions from individuals that require itemization.</p>

## Failure to Properly Itemize Contributions and Transfers to Political Committees

Report	RFAI Due Date	Response Date(s)	Response Code	Reason for code
Amended 2021 M4, received 2/7/22	6/22/22	N/A	NR	<p>Schedule B supporting Line 23 failed to disclose the office sought for contributions to four (4) federal candidates totaling \$25,000.00.</p> <p>The Committee failed to respond to the RFAI.</p>
2022 YE	5/8/23	5/9/23	LIR	<p>Schedule B supporting Line 23 failed to disclose the office sought for contributions to four (4) federal candidates totaling \$25,000.00.</p> <p>The Committee filed an Amended 2022 YE on 5/9/23 that failed to adequately address the issue.</p>

## Response Codes

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NR – No Response