



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

May 14, 2024

Todd C. Hagopian

Re: ADR 1153 (8180)  
Libertarian National Committee, Inc. and Todd C. Hagopian, Treasurer  
(C00255695)

Dear Mr. Hagopian:

On October 10, 2023, the Federal Election Commission (FEC/Commission) received a Complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended, and provided notification to you including a copy of the Complaint.

After considering the circumstances of this matter, the Commission decided to dismiss the matter. In its memorandum to the Commission, dated April 24, 2024, this office stated:

**Summary and Analysis of Case:** On October 10, 2023, Jeremy David Kantorowicz filed a Complaint with the Federal Election Commission alleging that Libertarian National Committee, Inc. and Todd C. Hagopian, Treasurer (Respondents or the Committee) failed to properly itemize or disclose disbursements paid with the Committee's credit card. The Complaint references incurred credit card debts disclosed on the Committee's 2023 July Monthly, August Monthly, and September Monthly Reports, totaling \$38,240.16<sup>1</sup>. The Complaint further references instructions on the Commission's website<sup>2</sup> and contends political parties reporting operating expenditures charged on a committee credit card must itemize, as a memo entry, any specific transactions charged on a credit card.

In a response dated November 1, 2023, the Committee states that the credit card transactions listed in the Complaint are debts that are properly disclosed on Schedule D (Debts and Obligations) of their reports. Respondents also explain that memo entries with

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<sup>1</sup> The Complaint references debts totaling \$38,240.16; however, the Committee has since filed amendments to the 2023 July, August, and September Monthly Reports which reduce the amounts incurred for some of the referenced credit card debts. As of the Committee's most recent amendments, filed on December 20, 2023, the referenced credit card debt totals \$30,488.33.

<sup>2</sup> <https://www.fec.gov/help-candidates-and-committees/filing-political-party-reports/credit-card-disbursements/>

the ultimate payee information are disclosed when the outstanding debts are reported as paid on Schedule B (Itemized Disbursements).

Upon review of the Committee's reports by the Reports Analysis Division (RAD), it appears the Committee properly disclosed and itemized disbursements related to its credit card per 52 U.S.C. §§ 30104(b)(5) and (b)(8), 11 C.F.R. § 104.9. The Committee's reports adhere to the reporting guidance contained on the Commission's website<sup>3</sup>, which states:

...A credit card *payment* must be itemized on Schedule B, supporting Line 21(b) if payments exceed the \$200 aggregate threshold during the calendar year...The committee must also itemize, as a memo entry, any specific transactions charged on a credit card if payments to the actual vendor exceed the \$200 aggregate threshold during the calendar year. (emphasis added)

The Committee satisfied the Commission's reporting requirements by disclosing the credit card payments and the related memo entries on their 2023 November Monthly Report, filed November 20, 2023. Specifically, on Schedule D, the Committee reports each of the referenced debts, totaling \$30,488.33, were paid in full. In addition, on Schedule B, the Committee discloses the related disbursements as credit card payments and itemizes ultimate payee information as memo entries.

Accordingly, the Commission closed its file in this matter on May 8, 2024.

The FEC is obligated by federal regulations to make a finding to terminate its proceedings public, as well as the basis therefore. 11 C.F.R. § 111.20. In addition, the Commission will also place on the record copies of the complaint, correspondence exchanged between Respondents and the Commission, and reports prepared for the Commission by this office to assist in its consideration of this matter. Accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Information Office.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 52 U.S.C. § 30109(a)(8).

Sincerely,



Rosa Marshall  
Assistant Director  
Alternative Dispute Resolution Office

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<sup>3</sup> See Footnote 2.