

REPORTS ANALYSIS REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: February 25, 2008

ANALYST: Julie Fleming

I. COMMITTEE: Oregon Republican Party
C00153031
Charles Oakes, Treasurer (2/17/2005 – Present)
Vance Day, Treasurer (3/11/2004 – 2/16/2005)
P.O. Box 789
Salem, OR 97308

TYPE OF COMMITTEE State Party

II. REGISTRATION: March 26, 1982

III. BACKGROUND:

The Committee was sent forty (40) Requests for Additional Information (RFAs) for reporting errors involving excessive contributions, mathematical discrepancies, failure to provide supporting schedules, Federal Election Activity/Levin funds, and allocated federal and non-federal activity. Furthermore, the Committee was sent late filer notices for failing to timely file four (4) reports.

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VIOLATION DESCRIPTION	REPORT(S)	DETAILS OF VIOLATION
Failure to File Reports and Late Filing	2006 M4	The Committee filed the 2006 April Monthly Report 119 days late.
Failure to File Reports and Late Filing	2006 M5	The Committee filed the 2006 May Monthly Report 89 days late.
Failure to File Reports and Late Filing	2006 M6	The Committee filed the 2006 June Monthly Report 58 days late.
Failure to File Reports and Late Filing	2006 12G	The Committee filed the 2006 12 Day Pre-General Report 25 days late.
Excessive, Prohibited and Other Impermissible Contributions or Transfers	2005 Amended YE, received 2/16/06	Schedule A of the Committee's report disclosed the receipt of an excessive contribution totaling \$3,000.00 from one (1) individual.
Mathematical Discrepancies	2006 M3	The Committee's report contained mathematical discrepancies totaling \$36,218.72.
Mathematical Discrepancies	2006 M4	<p>The Committee's report contained mathematical discrepancies totaling \$112,630.72, as detailed below:</p> <ul style="list-style-type: none"> • The Committee's beginning cash balance, \$26,418.68, was greater than the ending cash balance of the Committee's previous report, \$15,502.68, a discrepancy of \$10,916.00. • The Committee's report contained Column B discrepancies totaling \$101,714.72.
Mathematical Discrepancies	2006 M7	The Committee's report contained mathematical discrepancies totaling \$93,988.84.
Mathematical Discrepancies	2006 12G	The Committee's report contained mathematical discrepancies totaling \$10,192.17.
Failure to Provide Supporting Schedules	2005 M4	Schedule A supporting Line 12 of the Committee's reports for a three-month period disclosed \$17,461.16 in transfers received from a joint fundraiser. However, the supporting itemized memo entries provided on Schedule A totaled \$566.08, creating a discrepancy of \$16,895.08.
Failure to Provide Supporting Schedules	2005 M8	<p>Schedule D of the Committee's report disclosed four (4) debts owed by the Committee with outstanding beginning balances. However, Schedule D of the previous report disclosed no outstanding ending balances at the close of the period, resulting in a missing schedule of \$21,328.16.</p> <p>Schedule D of the Committee's previous report disclosed a debt owed to a vendor with an outstanding</p>

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		ending balance of \$1,574.81. However, Schedule D of this report disclosed the outstanding beginning balance as \$4,869.54, resulting in a missing schedule of \$3,294.73.
Failure to Provide Supporting Schedules	2005 M9	Schedule D of the Committee's previous report disclosed a debt owed to a vendor with an outstanding ending balance of \$4,869.54. However, Schedule D of this report disclosed the outstanding beginning balance as \$3,294.73, resulting in a missing schedule of \$1,574.81.
Failure to Provide Supporting Schedules	2006 M4	<p>Schedule D of the Committee's report disclosed five (5) debts owed by the Committee with outstanding beginning balances. However, Schedule D of the previous report disclosed no outstanding ending balances at the close of the period, resulting in a missing schedule of \$31,784.25.</p> <p>Schedule D of the Committee's previous report disclosed a debt owed to a vendor with an outstanding ending balance of \$896.99. However, Schedule D of this report disclosed the outstanding beginning balance as \$4,191.72, resulting in a missing schedule of \$3,294.73.</p> <p>The Committee failed to provide supporting schedules totaling \$30,974.58 as detailed below:</p> <ul style="list-style-type: none"> • The Committee failed to provide a Schedule A to itemize the \$16,499.50 in contributions from individuals/ persons other than political committees disclosed on Line 11(a)(i), Column A, of the Detailed Summary Page. • The Committee failed to provide a Schedule B to itemize the \$20,475.08 in other federal operating expenditures disclosed on Line 21(b), Column A, of the Detailed Summary Page.
Failure to Provide Supporting Schedules	2006 M5	<p>The Committee failed to provide supporting schedules totaling \$36,678.96, as detailed below:</p> <ul style="list-style-type: none"> • The Committee failed to provide a Schedule A to itemize the \$17,100.00 in contributions from individuals/persons other than political committees, disclosed on Line 11(a)(i), Column A, of the Detailed Summary Page. • The Committee failed to provide a Schedule B to itemize the \$19,578.96 in other federal operating expenditures, disclosed on Line 21(b), Column A, of the Detailed Summary Page.

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Failure to Provide Supporting Schedules	2006 Amended M5, received 10/18/06	The Committee's amended report failed to include all of the activity previously disclosed on Schedules A and B, resulting in missing schedules of \$15,803.00 and \$3,337.02, respectively.
Failure to Provide Supporting Schedules	2006 M6	The Committee failed to provide supporting schedules totaling \$76,595.39, as detailed below: <ul style="list-style-type: none"> • The Committee failed to provide a Schedule A to itemize the \$38,745.62 in Individual Contributions (Itemized), disclosed on Line 11(a)(i), Column A, of the Detailed Summary Page. • The Committee failed to provide a Schedule B to itemize the \$37,849.77 in Other Federal Operating Expenditures, disclosed on Line 21(b), Column A, of the Detailed Summary Page.
Failure to Provide Supporting Schedules	2006 Amended M6, received 10/19/06	The Committee's amended report failed to include all of the activity previously disclosed on Schedules A and B, resulting in missing schedules of \$36,745.62 and \$30,862.24, respectively.
Failure to Provide Supporting Schedules	2006 M7	Schedule D of the Committee's previous report disclosed a debt owed to a vendor with an outstanding ending balance of \$4,191.72. However, Schedule D of this report disclosed the outstanding beginning balance as \$896.99, resulting in a missing schedule of \$3,294.73. Schedule D of the Committee's previous report disclosed five (5) debts totaling \$31,784.25 with outstanding ending balances; however, these debts were not disclosed as outstanding on this report.
Federal Election Activity/ Levin Funds	2005 M4	On Schedule B, the Committee disclosed \$7,826.30 in disbursements made for "direct mail," "direct mail consulting fee," and "fundraising telemarketing," but failed to clarify whether these disbursements were FEA public communications that promoted, supported, attacked or opposed Federal candidates or if they expressly advocated the election or defeat of clearly identified Federal candidates.
Allocated Federal and Non-Federal Activity	2005 M2	On Schedule H1, the Committee disclosed an incorrect fixed percentage for allocated federal and non-federal administrative, generic voter drive and exempt activity costs.
Allocated Federal and Non-Federal Activity	2005 M4	The Committee disclosed disbursements totaling \$129,451.00; however, the report disclosed limited payments for administrative expenses.

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Allocated Federal and Non-Federal Activity	2006 M2	The Committee disclosed four (4) transfers totaling \$14,442.53 from an apparent non-federal account on Schedule A for allocated activity. The Committee failed to properly disclose these transfers on Schedule H3.
Allocated Federal and Non-Federal Activity	2006 Amended M4, received 10/13/06	Line 18(a), Column A of the Detailed Summary Page disclosed \$14,442.53 in transfers from the non-federal account for allocable activity for a 3-month period. However, Line 21(a)(ii), Column A disclosed \$6,012.39 in the non-federal share of disbursements for the period, resulting in an apparent excessive transfer of approximately \$8,430.14 from the non-federal account.
Allocated Federal and Non-Federal Activity	2006 M10	Line 18(a), Column A of the Detailed Summary Page disclosed \$13,156.59 in transfers from the non-federal account for allocable activity for the period. However, Line 21(a)(ii), Column A disclosed \$10,068.31 in the non-federal share of disbursements for the period, resulting in an apparent excessive transfer of approximately \$7,821.82 from the non-federal account.
Allocated Federal and Non-Federal Activity	2006 YE	Line 18(a), Column A of the Detailed Summary Page disclosed \$54,878.71 in transfers from the non-federal account for allocable activity for a 3-month period. However, Line 21(a)(ii), Column A disclosed \$21,241.47 in the non-federal share of disbursements for the period, resulting in an apparent excessive transfer of approximately \$33,637.24 from the non-federal account.

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