REPORTS ANALYSIS DIVISION REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE:

September 15, 2017

ANALYST:

Nicole Miller

I. COMMITTEE:

Democratic Party Of Arkansas

C00024372

Tyler Clark, Treasurer 1300 West Capitol Ave Little Rock, AR 72201

TYPE OF COMMITTEE:

Party

II. REGISTRATION DATE:

March 8, 1976

III. MULTICANDIDATE STATUS:

Qualified

IV. BACKGROUND:

The Committee was sent sixteen (16) Requests for Additional Information (RFAIs) for reporting errors including excessive, prohibited and other impermissible contributions or transfers, mathematical discrepancies, failure to provide supporting schedules, federal election activity/levin funds, allocated federal and non-federal activity, and failure to properly itemize loans.

Democratic Party of Arkansas (C00024372) ADRO Referral Response Guide

Prohibited Contributions and Other Impermissible Contributions or Transfers

	Report	RFAI Due	Response	Response	Reason for code
	2015 M7	Date 10/28/15	Date(s)	Code NR	Schedule A supporting Line 11(c) disclosed the receipt of apparent
					prohibited contributions from one (1) unregistered political organization totaling \$1,500.00, or 21.4% of the total contributions from other federal political committees.
				i	The Committee failed to respond to the RFAI.
					Schedule A supporting Line 11(c) disclosed the receipt of an apparent prohibited contribution totaling \$5,000.00 from one (1) political action committee that was disclosed on the contributor's disbursement schedule as a contribution to the non-federal account. The apparent prohibited contribution received totals 71.4% of the contributions from other political committees.
				,	The Committee failed to respond to the RFAI.
	2016 M7	9/26/16	N/A	NR	Schedule A supporting Line 11(c) disclosed the receipt of an apparent prohibited contribution totaling \$5,000.00 from one (1) political action committee that was disclosed on the contributor's disbursement schedule as a contribution to the non-federal account. The apparent prohibited contribution received totals 100% of the contributions from other political committees.
					The Committee failed to respond to the RFAI.
-	2016 M8	11/2/16	8/16/17	LAR	Schedule A supporting Line 17 disclosed the receipt of an excessive contribution totaling \$5,000.00, or 4.1% of the Committee's total contributions from individuals. This contribution was received from one (1) individual.
		[•	The Committee filed an Amended 2016 M8 and 2016 M10 on 8/16/17 that disclosed the timely transfer of the excessive receipt to the Committee's non-federal account.
	2016 30G	3/27/17	8/16/17	LAR	Schedule A supporting Line 11(c) disclosed the receipt of a prohibited contribution totaling \$5,000.00, or 100% of the total contributions from federal political committees. This contribution was received from one (1) corporation.
					The Committee filed an Amended 2016 30G on 8/16/17 and provided a memo text which stated, in part, "The funds received by the committee from the National Retail Federation were disbursed through the organization's federally registered PAC. This report has been amended to reflect this."

Mathematical Discrepancies

Report	RFAI Due Date	Response Date(s)	Response Code	Reason for code
2016 12G	3/27/17	8/16/17	LAR	The Committee's report contained mathematical discrepancies totaling \$3,698.84, as detailed below:
				The beginning cash balance, \$31,070.93, was greater than the ending cash balance of the previous report, \$29,645.15, a discrepancy of \$1,425.78.
				The report contained mathematical discrepancies on several lines in Column B totaling \$1,943.52.
				Line 8, Column A, -\$2,834.84, of the Summary Page did not equal Line 8, Column B, -\$2,505.30, of the Summary Page, a discrepancy of \$329.54.
	į			The Committee filed an Amended 2016 12G and 2016 M10 on 8/16/17 which corrected these mathematical discrepancies.
2016 YE	3/27/17	8/16/17	LIR	The Committee's report contained mathematical discrepancies totaling \$153,803.46, as detailed below:
				The beginning cash balance, \$26,327.38, was greater than the ending cash balance of the previous report, -\$46,305.18, a discrepancy of \$72,632.56.
	·		^	The report contained mathematical discrepancies on several lines in Column B totaling \$63,600.51.
_			!	Line 8, Column A, \$3,994.32, of the Summary Page did not equal Line 8, Column B, -\$13,576.43, of the Summary Page, a discrepancy of \$17,570.75.
				The Committee filed an Amended 2016 YE and 2016 30G that failed to adequately resolve these errors.

Failure to Provide Supporting Schedules

Report	RFAI Due Date	Response Date(s)	Response Code	Reason for code
2015 M4	10/28/15	N/A	NR	The Committee failed to provide a Schedule C for the \$20,000.00 in loans received by the Committee disclosed on Schedule A supporting Line 13 of the Detailed Summary Page.
				The Committee failed to respond to the RFAI.
2016 M3	6/6/16	N/A	NR	The Committee failed to provide a Schedule C for the \$20,000.00 in loans received by the Committee disclosed on Schedule A supporting Line 13 of the Detailed Summary Page.
				The Committee failed to respond to the RFAI.
2016 M5	8/1/16	N/A	NR	The Committee failed to provide a Schedule C for the \$10,000.00 in loans

				received by the Committee disclosed on Schedule A supporting Line 13 of the Detailed Summary Page. The Committee failed to respond to the RFAI.
2016 M8	11/2/16	8/16/17	LAR	Schedule A supporting Line 11(a)(i) disclosed an unitemized lump sum receipt of \$1,270.00 However, the Committee failed to clarify whether this amount includes any receipts aggregating greater than \$200 from an individual in the calendar year.
			·	The Committee filed an Amended 2016 M8 on 8/16/17 which disclosed a memo text which stated in part: "Any receipts identified as Unitemized Contributions on Schedule A supporting Line 11(a)(i) appeared as the result of a software error which has been corrected on this report. These receipts did not include any contributions aggregating greater than \$200.00 from an individual on the calendar year and now correctly are accounted for on Line 11(a)(ii)."
2016 YE	3/27/17	8/16/17	LIR	Schedule A supporting Line 12 disclosed \$156,790.17 in transfers received from two (2) joint fundraisers during the 2016 calendar year. However, the supporting itemized memo entries provided on Schedule A during 2016 total \$52,758.73, creating a discrepancy of \$104,031.44.
				The Committee filed an Amended 2016 YE on 8/16/17 that failed to adequately resolve this issue.

Federal Election Activity/Levin Funds

Report	RFAI Due Date	Response Date(s)	Response Code	Reason for code
2016 30G	3/27/17	8/16/17	LAR	Schedule B supporting Line 30(b) disclosed \$5,833.51 in disbursements for "Postage for Mailer," "Postage for Mailers," and "Robocalls" 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, which would require additional disclosure. The Committee filed an Amended 2016 30G on 8/16/17 that disclosed memo text which stated in part: "This report has been amended to reflect this. Any Schedule H4 disbursements for Postage for Mailers, Postage for Mailer, or Robocalls were for activities generally promoting the Arkansas Democratic Party and its activities. These disbursements did not express support or opposition to any specific candidate."

Allocated Federal and Non-Federal Activity

Report	RFAI Due Date	Response Date(s)	Response Code	Reason for code
2015 M7	10/28/15	5/25/16	LAR	The Committee disclosed disbursements totaling \$199,617.71 for a 3-month period; however, the report disclosed limited payments for administrative expenses.

				The Committee filed an Amended 2015 YE on 5/25/16, and provided a memo text, which stated in part: "There are no payments for rent because the Committee owns its own building and the mortgage is paid for with non-federal funds, as permissible," clarifying the discrepancy.
2015 M10	1/19/16	N/A	NR	Schedule H3 disclosed transfers-in from the non-federal account for "JJ 2015" which may exceed the non-federal share of allocable fundraising expenditures by as much as \$22,504.93. The Committee failed to respond to the RFAL.
2015 YE	5/18/16	5/25/16	LAR	The Committee disclosed disbursements totaling \$268,908.88 for a 3-month period; however, the report disclosed limited payments for administrative expenses. The Committee filed an Amended 2015 YE on 5/25/16, and provided a memo text, which stated in part: "There are no payments for rent because the Committee owns its own building and the mortgage is paid for with non-federal funds, as permissible," clarifying the discrepancy.
2016 M2	5/19/16	6/19/16	LAR	The Committee failed to provide a Schedule H1 to disclose the allocation ratio for administrative expenditures on Schedule H4. The Committee filed an Amended 2016 M2 on 6/19/16, and provided the missing Schedule H1, correcting the discrepancy.

Failure to Properly Itemize Loans

Report	RFAI Due Date	Response Date(s)	Response Code	Reason for code
2015 M4	10/28/15	N/A	NR	The Committee has not provided an electronic Schedule C-1, a paper Schedule C-1 that has been certified by an official from the lending institution, or a copy of the loan agreement supporting the \$20,000.00 loan disclosed on Schedule A supporting Line 13. The Committee failed to respond to the RFAI.
2016 M3	6/6/16	N/A	NR	The Committee has not provided an electronic Schedule C-1, a paper Schedule C-1 that has been certified by an official from the lending institution, or a copy of the loan agreement supporting the \$20,000.00 loan disclosed on Schedule A supporting Line 13. The Committee failed to respond to the RFAI.

Filings from:

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Loans	10,444.53	10,444.53	0.00	10,444.53	10,444.53	0.00	10,444.53	10,444.53	0.00	10,444.53	10:444.53	0.00	10,444.53	10,444.53	0.00	10,444.53	10,444.53	0.00	10,444.53	10,444.53	0.00	
<u>Debts</u>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
End Cash	1 198 64	36,977.39	0.00	86,312.34	86,983.57	0.00	59,436.29	59,737.07	0.00	29,645.15	40,013.30	0.00	-2,834.84	5,906.93	0.00	-46,305.18	9,256.60	0.00	3,994.32	-2,431.46	0.00	
Disb	62 157 5Q	56,648.80	0.00	132,169.46	134,718.23	0.00	849,453.90	849,363.96	0.00	874,440.15	879,490.15	00.0	57,049.27	57,049.87	0.00	206,037.35	209,466.25	0.00	45,221.90	45,221.90	0.00	
Bedin Casa County Charles Con-	59 409 00	92,427.55	00:00	181,504.41	184,724.41	0.00	822;577.85	822,577.85	00:0	844,649.01	848,387.43	0.00	23,143.50	22,793.50	00:00	154,700.49	204,949.40	00:0	22,888.84	22,888.84	0.00	3,736,958.47
Bedin Cash	. 3.947.23	1,198.64	0.00	36,977.39	36,977.39	0.00	86,312.34	86,523.18	0.00	59,436.29	71,116.02	0.00	31,070.93	40,163.30	0.00	5,031.68	13,773.45	0.00	26,327.38	19,901.60	0.00	3,562,332.57
Lttr Mail Dt			8/21/16			9/28/16			10/16/16			2/20/17			2/20/17	,		2/20/17			2/20/17	Total
End Cvg	Dt 5/31/16	6/30/16	6/30/16	7/31/16	7/31/16	7/31/16	8/31/16	8/31/16	8/31/16	9/30/16	9/30/16	9/30/16	10/19/16	10/19/16	10/19/16	11/28/16	11/28/16	11/28/16	12/31/16	12/31/16	12/31/16	Final Report's Total
Beg Cvg Dt	5/1/16	9		(O	9	9	(0		•													ш
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Filings from:

1/1/2013 - 12/31/2014

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	Candidate Name: Special Interest Group:	Sroup:	Z	Not Available)e			Ana	Analyst Assigned:	LITTLE ROC Nicole Miller	LITTLE ROCK, AR 72201 Nicole Miller			
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			2/26/14		14940536162	-			0.00	0.00	00:0	0.00	0.00	0.00
		⋖	3/17/14	9	14960504779				0.00	0.00	0.00	00.0	0.00	0.00
			6/27/14	-	14941631024				0.00	0.00	0.00	0.00	0.00	0.00
	M2	z	2/20/13	51	13961068481	1/1/13	1/31/13		58,656.04	18,321.94	45,936.01	31,041.97	0.00	30,079.67
	M3	z	3/20/13	44	13961197240	2/1/13	2/28/13		31,049.25	. 58,915.01	43,805.13	46,159.13	0.00	29,587.10
	Μ4	z	4/20/13	45	13940608354	3/1/13	3/31/13		46,159.13	18,284.09	46,386.24	18,056.98	0.00	29,073.23
2	RQ-2-M4	z		7	13330035553	3/1/13	3/31/13	8/6/13	0.00	00:0	0.00	0.00	0.00	0.00
	M5	z	5/20/13	45	13962649626	4/1/13	4/30/13		18,056.98	81,011.70	49,950.06	49,118.62	0.00	28,564.81
	M6	z	6/20/13	48	13963153190	5/1/13	5/31/13		49,118.62	54,854.84	68,887.97	35,085.49	0.00	28,035.98
	M7	z	7/20/13	75	13964427668	6/1/13	6/30/13		35,085.49	183,272.90	151,356.36	67,002.03	0.00	27,001.28
	Μ7	⋖	9/30/13	75	13941672861	6/1/13	6/30/13		35,085.49	183,272.90	151,356.36	67,002.03	0.00	27,001.28
×	RQ-2-M7	z		က	13330035555	6/1/13	6/30/13	8/6/13	0.00	0.00	0.00	0.00	0.00	0.00
	8	z	8/20/13	64 (13941475349	7/1/13	7/31/13		67,002.03	126,810.81	45,934.11	147,878.73	8 8	82.100,72
2	M8	∢ 2	9/30/13	49 6	13330037775	2/1/13	2/31/13	8/23/13	67,002.03	126,810.81	45,934.11	147,878.73	8 0	0.00
Ź	M9 6	: z	9/20/13	5.	13941636415	8/1/13	8/31/13		147,878.73	13,044.14	58.322.49	102,600.38	0.00	25,674.78
	6	< <	2/26/14	51	14960481680	8/1/13	8/31/13		147,878.73	13,044.14	58,322.49	102,600.38	0.00	25,674.78
2	RQ-2-M9	z		7	13330040633	8/1/13	8/31/13	11/18/13	0.00	0.00	0.00	0.00	0.00	0.00
_	M10	z	10/20/13	45	13942158860	9/1/13	9/30/13		102,600.38	72,478.13	36,316.62	138,761.89	0.00	25,674.78
_	M10	∢	2/26/14	45	14960481731	9/1/13	9/30/13		102,600.38	72,478.13	36,316.62	138,761.89	0.0	25,674.78
õ	3Q-2-M10	z			13330041501	9/1/13	9/30/13	12/17/13	00.0	00:0	0.00	0.00	0.00	0.00
_	M11	z	11/20/13	29	13942582908	10/1/13	10/31/13		138,761.89	123,212.00	120,524.84	141,449.05	0.00	24,622.92
_	M11	⋖	4/11/14	29	14960651685	10/1/13	10/31/13		138,761.89	123,212.00	120,524.84	141,449.05	0.00	24,622.92
ğ	3Q-2-M11	z		7	14330042632	10/1/13	10/31/13	1/30/14	0.00	0.00	0.00	0.00	0.00	0.00
-	M12	z	12/20/13	46	13944254284	11/1/13	11/30/13		141,449.05	90,132.94	124,778.67	106,803.32	0:00	24,622.92
Š	3Q-2-M12	z		7	14330048795	11/1/13	11/30/13	4/20/14	0.00	0.00	0.00	0.00	0.00	0.00
	¥	z	1/31/14	29	14940238118	12/1/13	12/31/13		106,803.32	97,548.36	111,203.27	93,148.41	0.00	24,092.12

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Loans	0.00	23,559.17	22,463.61	22,463.61	21,382.60	20,841.40	20,841.40	0.00	20,841.40	19,752.29	19,752.29	0.00	19,752.29	19,752.29	00.00	19,206.67	18,646.82	0.00	18,087.24	0.00	17,525.55	0.00	
Debts	0.00	00.00	00.0	00.0	0.00	0.00	0.00	00.00	0.00	0.00	0.00	00.00	00.0	0.00	00.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
End Cash	0.00	70,760.73	38,250.75	118,587.96	44,271.88	192,683.65	192,683.65	0.00	71,645.73	97,410.50	97,281.96	0.00	212,306.33	212,306.33	0.00	280,385.62	574,593.49	0.00	132,379.68	0.00	142,614.36	0.00	
Disb	0.00	84,770.32	144,617.42	174,545.18	227,422.79	239,223.40	239,223.40	00.0	980,832.41	893,978.49	894,107.03	0.00	688,409.92	688,409.92	0.00	1,074,636.12	1,583,176.23	00:0	2,282,706.41	00:0	105,309.85	0.00	
Bellicasi Natura	00:0	62,382.64	112,107.44	254,882.39	153,106.71	387,635.17	387,635.17	0.00	859,794.49	919,743.26	919,743.26	0.00	803,434.29	803,434.29	0.00	1,142,715.41	1,877,384.10	0.00	1,840;940.13	0.00	115,544.53	0.00	9,383,158.85
BEDINCASH	0.00	93,148.41	70,760.73	38,250.75	118,587.96	44,271.88	44,271.88	00.00	192,683.65	71,645.73	71,645.73	0.00	97,281.96	97,281.96	0.00	212,306.33	280,385.62	0.00	574,145.96	00.00	132,379.68	0.00	9,467,557.42
Lttr Mail Dt	4/24/14							7/30/14				10/19/14			11/9/14			1/15/15		3/10/15		3/3/15	s Total
End Cva	12/31/13	1/31/14	2/28/14	3/31/14	4/30/14	5/31/14	5/31/14	5/31/14	6/30/14	7/31/14	7/31/14	7/31/14	8/31/14	8/31/14	8/31/14	9/30/14	10/15/14	10/15/14	11/24/14	11/24/14	12/31/14	12/31/14	Final Report's Total
Beg Cvg Dt	12/1/13	1/1/14	2/1/14	3/1/14	4/1/14	5/1/14	5/1/14	5/1/14	6/1/14	7/1/14	7/1/14	7/1/14	8/1/14	8/1/14	8/1/14	9/1/14	10/1/14	10/1/14	10/16/14	10/16/14	11/25/14	11/25/14	
Begin Image	14330049070	14960473227	14960533034	14960854259	14961182805	14941625715	14950095965	14330055554	14961695568	14950081019	14953215988	14330062633	14970892151	14983684814	14330065979	14951855777	14952539557	15330072162	14953162955	15330078287	15970237171	15330077815	
Pas		45	28	11	82	101	101	4	151	168	167	4	217	218	8	246	110	ო	384	4	72	က	•
Receipt Dt		2/20/14	3/20/14	4/19/14	5/20/14	6/20/14	9/3/14		7/20/14	8/20/14	12/19/14		9/20/14	12/19/14		10/20/14	10/23/14		12/4/14		1/31/15		•
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Report	RQ-2-YE	₩	M3	₩.	M5	W6	W6	RQ-2-M6	M7	₩	M8	RQ-2-M8	W	M	RQ-2-M9	M10	126	₹0-2-126	300	₹0-2-30€	¥	RQ-2-YE	
Form	RFAI	F3XN	F3XN	F3XN	F3XN	F3XN	F3XA	RFAI	F3XN	F3XN	F3XA	RFAI	F3XN	F3XA	RFA	F3XN	F3XN	RFAI	F3XN	RFAI	F3XN	RFAI	