

## REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: October 19, 2007

ANALYST: Laura Sinram

I. COMMITTEE: Nevada Republican State Central Committee  
C00082925  
Basil Raffa, Treasurer (11/10/05 – present)  
Steve Martin, Treasurer (12/5/02 - 11/9/05)  
8625 W. Sahara Ave  
Las Vegas, NV 89117

II. RELEVANT STATUTE: 2 U.S.C. §434(b)(4)  
2 U.S.C. §434(e)(2)(A) and (B)  
11 C.F.R. §104.3 (b)(1)  
11 C.F.R. §104.17(b)(3)

## III. BACKGROUND:

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

On January 9, 2007, Nevada Republican State Central Committee (“the Committee”) filed an Amended 2006 September Monthly Report to disclose additional disbursements totaling \$51,429.63 and, on February 24, 2007, an Amended 2006 October Monthly Report to disclose additional disbursements totaling \$121,918.69 (Attachment 2).

**2006 September Monthly Report**

On September 20, 2006, the Committee filed the September Monthly Report covering the period from August 1, 2006 to August 31, 2006 (Image 26960392286). This report disclosed \$23,066.02 in disbursements on Line 21(a)(i) (Federal Share of Allocated Operating Expenditures), \$31,005.87 in disbursements on Line 21(a)(ii) (Non-Federal Share of Allocated Operating Expenditures), \$63,841.19 in disbursements on Line 21(b) (Other Federal Operating Expenditures), \$0.00 in disbursements on Line 30(a)(i) (Federal Share of Allocated Federal Election Activity), \$0.00 in disbursements on Line 30(a)(ii)

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(Levin Share of Allocated Federal Election Activity), and \$808.00 in disbursements on Line 30(b) (Federal Election Activity Paid entirely With Federal Funds) (Image 26960392289).

On January 9, 2007, the Committee filed an Amended 2006 September Monthly Report covering the period from August 1, 2006 to August 31, 2006 (Image 27940035828). This report disclosed \$11,134.74 in disbursements on Line 21(a)(i) (Federal Share of Allocated Operating Expenditures), \$41,887.96 in disbursements on Line 21(a)(ii) (Non-Federal Share of Allocated Operating Expenditures), \$42,550.63 in disbursements on Line 21(b) (Other Federal Operating Expenditures), \$34,140.55 in disbursements on Line 30(a)(i) (Federal Share of Allocated Federal Election Activity), \$9,075.34 in disbursements on Line 30(a)(ii) (Levin Share of Allocated Federal Election Activity), and \$31,361.49 in disbursements on Line 30(b) (Federal Election Activity Paid Entirely With Federal Funds) (Image 27940035831).

On June 8, 2007, a Request for Additional Information ("RFAI") was sent to the Committee referencing the Amended 2006 September Monthly Report, received January 9, 2007 (Image 27039451608). Among other matters, the RFAI sought clarification regarding the \$51,429.63 in additional disbursements that were not disclosed on the Committee's original 2006 September Monthly Report.

On July 6, 2007, the Committee filed a Miscellaneous Electronic Submission (Form 99) which stated in part:

"...In regard to the additional disbursements reported on this amended report from the original, during and [sic] internal review we identified inadvertent data entry errors that caused some disbursements to be reported as nonfederal to our state reporting, as well as some disbursements that were reported to our state reporting that should have been reported as federal. We have corrected these errors and filed the amendments accordingly. Additionally, we have implemented a system to cross check all entries of disbursements and contributions to ensure this will not recur." (Image 27930868459)

On July 6, 2007, the Committee filed an Amended 2006 September Monthly Report covering the period from August 1, 2006 to August 31, 2006 (Image 27930868503). This report disclosed \$11,134.74 in disbursements on Line 21(a)(i) (Federal Share of Allocated Operating Expenditures), \$41,887.96 in disbursements on Line 21(a)(ii) (Non-Federal Share of Allocated Operating Expenditures), \$42,550.63 in disbursements on Line 21(b) (Other Federal Operating Expenditures), \$9,075.34 in disbursements on Line 30(a)(i) (Federal Share of Allocated Federal Election Activity), \$34,140.55 in disbursements on Line 30(a)(ii) (Levin Share of Allocated Federal Election Activity), and \$31,361.49 in disbursements on Line 30(b) (Federal Election Activity Paid Entirely With Federal Funds) (Image 27930868506).

On July 18, 2007, the Reports Analysis Division ("RAD") Analyst spoke with Chrissy Hastie, the Committee's consultant, and informed her that the increase in disbursements on the Amended 2006 September Monthly Report would be referred to the Alternative Dispute Resolution Office (ADRO) for further review. The Analyst informed Ms. Hastie that she could file an additional response to provide any additional information regarding the increase in disbursements (Attachment 3).

On July 25, 2007, the Analyst spoke with Ms. Hastie regarding both the 2006 October Monthly Report referral to the Office of General Counsel (OGC), detailed below, and the 2006 September Monthly Report referral to ADRO. Ms. Hastie wanted to know if the referrals would be combined. The Analyst explained that the referrals would be combined, but stated she did not know which office would be reviewing the matter (Attachment 3).

### **2006 October Monthly Report**

On October 20, 2006, the Committee filed the 2006 October Monthly Report covering the period from September 1, 2006 to September 30, 2006 (Image 26940511346). The report disclosed \$7,610.50 in disbursements on Line 21(a)(i) (Federal Share of Allocated Operating Expenditures), \$28,629.95 in disbursements on Line 21(a)(ii) (Non-Federal Share of Allocated Operating Expenditures), \$8,362.50 in disbursements on Line 21(b) (Other Federal Operating Expenditures), \$225.00 in disbursements on Line 28(a) (Refunds of Contributions To Individuals/Persons Other Than Political Committees), \$0.00 in disbursements on Line 29 (Other Disbursements), \$0.00 in disbursements on Line 30(a)(i) (Federal Share of Allocated Federal Election Activity), \$0.00 in disbursements on Line 30(a)(ii) (Levin Share of Allocated Federal Election Activity), and \$0.00 in disbursements on Line 30(b) (Federal Election Activity Paid Entirely With Federal Funds) (Image 26940511349).

On February 24, 2007, the Committee filed an Amended 2006 October Monthly Report covering the period from September 1, 2006 to September 30, 2006 (Image 27930168194). This report disclosed \$9,080.63 in disbursements on Line 21(a)(i) (Federal Share of Allocated Operating Expenditures), \$34,160.43 in disbursements on Line 21(a)(ii) (Non-Federal Share of Allocated Operating Expenditures), \$5,811.69 in disbursements on Line 21(b) (Other Federal Operating Expenditures), \$815.00 in disbursements on Line 28(a) (Refunds of Contributions To Individuals/Persons Other Than Political Committees), \$5,145 in disbursements on Line 29 (Other Disbursements), \$50,458.49 in disbursements on Line 30(a)(i) (Federal Share of Allocated Federal Election Activity), \$13,413.01 in disbursements on Line 30(a)(ii) (Levin Share of Allocated Federal Election Activity), and \$47,862.39 in disbursements on Line 30(b) (Federal Election Activity Paid Entirely With Federal Funds) (Image 27930168197).

On June 13, 2007, a Request for Additional Information ("RFAI") was sent to the Committee referencing the Amended 2006 October Monthly Report, received February 24, 2007. Among other matters, the RFAI sought clarification regarding the \$121,918.69

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in additional disbursements that were not disclosed on the Committee's original 2006 October Monthly Report (Image 27039452641).

On July 6, 2007, the Committee filed a Miscellaneous Electronic Submission (Form 99) which stated in part:

"...In regard to the additional disbursements reported on this amended report from the original, during and [sic] internal review we identified inadvertent data entry errors that caused some disbursements to be reported as nonfederal to our state reporting, as well as some disbursements that were reported to our state reporting that should have been reported as federal. We have corrected these errors and filed the amendments accordingly. Additionally, we have implemented a system to cross check all entries of disbursements and contributions to ensure this will not recur." (Image 27990188096)

On July 6, 2007, the Committee filed an Amended 2006 October Monthly Report covering the period from September 1, 2006 to September 30, 2006 (Image 27930868593). This report disclosed \$9,080.63 in disbursements on Line 21(a)(i) (Federal Share of Allocated Operating Expenditures), \$34,160.43 in disbursements on Line 21(a)(ii) (Non-Federal Share of Allocated Operating Expenditures), \$5,811.69 in disbursements on Line 21(b) (Other Federal Operating Expenditures), \$815.00 in disbursements on Line 28(a) (Refunds of Contributions To Individuals/Persons Other Than Political Committees), \$5,145.00 in disbursements on Line 29 (Other Disbursements), \$13,413.01 in disbursements on Line 30(a)(i) (Federal Share of Allocated Federal Election Activity), \$50,458.49 in disbursements on Line 30(a)(ii) (Levin Share of Allocated Federal Election Activity), and \$47,862.39 in disbursements on Line 30(b) (Federal Election Activity Paid Entirely With Federal Funds) (Image 27930868596).

On July 25, 2007, the RAD Analyst left a message for Ms. Hastie and informed her that the increase in disbursements on the Amended 2006 October Monthly Report will be referred to OGC for further review. The Analyst informed Ms. Hastie that she could file an additional response if she wanted to provide any additional information regarding the increase in disbursements (Attachment 3).

On July 25, 2007, the Analyst spoke with Ms. Hastie regarding both the 2006 October Monthly Report referral to OGC and the 2006 September Monthly Report referral to the ADRO. Ms. Hastie wanted to know if the referrals would be combined. The Analyst explained that the referrals would be combined, but she did not know which office would be reviewing the matter (Attachment 3).

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

NEVADA REPUBLICAN STATE CENTRAL COMMITTEE

Basil Raffa 8625 W Sahara Ave Las Vegas PARTY QUALIFIED NV 89117 ID #C00082925

FILING FREQUENCY: MONTHLY

FORM TYPE RPT TYPE AI PGI REC DATE PGS BEG IMAGE COVERAGE DATES BEG CASH RECEIPTS DISBURSE END CASH DEBTS BY

28190274053

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1		A	4/07/2006	4	26940049267
MS		T	1/08/2005	1	25980108294
MS		T	1/08/2005	2	25980108398
MS		T	1/18/2005	1	25980175058
MS		T	1/18/2005	1	25980175250
MS		T	3/03/2005	1	25990178050
MS		T	3/03/2005	1	25990178051
MS		T	3/26/2005	1	25990300918
MS		T	3/26/2005	1	25990301579
MS		T	3/26/2005	1	25990301650
MS		T	5/07/2005	1	25990738338
MS		T	5/07/2005	1	25990738777
MS		T	7/20/2005	1	25980599947
MS		T	7/20/2005	1	25980600094
MS		T	10/09/2005	3	25971118548
MS		T	3/18/2006	1	26920010093
MS		T	7/13/2006	1	26940235689
MS		T	8/12/2006	1	26930312735
MS		T	8/13/2006	1	26940290065
MS		T	11/28/2006	2	26960679057

RQ	M2	2	7/06/2005	3	25038832089	1/01/2005	1/31/2005
RQ	M8	2	9/02/2005	3	25038891967	7/01/2005	7/31/2005
RQ	YE	2	3/10/2006	3	26039012471	12/01/2005	12/31/2005
RQ	M2	2	3/22/2006	3	26039020614	1/01/2006	1/31/2006
RQ	M4	2	5/10/2006	3	26039073806	3/01/2006	3/31/2006
RQ	M4	2	6/13/2007	3	27039452635	3/01/2006	3/31/2006
RQ	M5	2	6/16/2006	3	26039100829	4/01/2006	4/30/2006
RQ	M6	2	7/26/2006	3	26039153050	5/01/2006	5/31/2006
RQ	M7	2	10/27/2006	4	26039254401	6/01/2006	6/30/2006

NEVADA REPUBLICAN STATE CENTRAL COMMITTEE

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ID #C00082925

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FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
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RQ	M9	2		12/08/2006	6	26039301080	8/01/2006 8/31/2006					
RQ	M9	2		6/08/2007	4	27039451608	8/01/2006 8/31/2006					
RQ	M10	2		1/24/2007	6	27039350955	9/01/2006 9/30/2006					
RQ	M10	2		6/13/2007	3	27039452641	9/01/2006 9/30/2006					
RQ	12G	2		3/30/2007	5	27039412162	10/01/2006 10/18/2006					
RQ	12G	2		6/13/2007	3	27039452638	10/01/2006 10/18/2006					
RQ	30G	2		4/06/2007	5	27039413882	10/19/2006 11/27/2006					
RQ	YE	2		4/18/2007	4	27039424978	11/28/2006 12/31/2006					
RQ	YE	2		6/20/2007	3	27039454083	11/28/2006 12/31/2006					
3	M2	N	P	2/19/2005	42	25990091254	1/01/2005 1/31/2005	314361	24563	81277	257647	12000
3	M2	A	P	7/20/2005	40	25980599907	1/01/2005 1/31/2005	314361	24563	81277	257647	12000
3	M3	N	P	3/18/2005	31	25980450480	2/01/2005 2/28/2005	257647	11968	37990	231624	12000
3	M3	A	P	7/20/2005	32	25980599960	2/01/2005 2/28/2005	257647	11968	37990	231624	12000
3	M4	N	P	4/20/2005	31	25990528574	3/01/2005 3/31/2005	231624	20429	57183	194869	10000
3	M4	A	P	7/20/2005	31	25980600001	3/01/2005 3/31/2005	231624	20429	57183	194869	10000
3	M5	N	P	5/19/2005	34	25980515314	4/01/2005 4/30/2005	194869	18840	34126	179583	10000
3	M5	A	P	7/20/2005	34	25980600032	4/01/2005 4/30/2005	194869	18840	34126	179583	10000
3	M6	N	P	6/17/2005	27	25970373798	5/01/2005 5/31/2005	179583	5406	28844	156145	10000
3	M6	A	P	7/20/2005	28	25980600066	5/01/2005 5/31/2005	179583	5406	28844	156145	10000
3	M7	N	P	7/20/2005	31	25980599876	6/01/2005 6/30/2005	156145	44019	33301	166863	10000
3	M8	N	P	8/19/2005	32	25970955940	7/01/2005 7/31/2005	166863	49907	39612	177158	10000
3	M9	N	P	9/16/2005	34	25971030351	8/01/2005 8/31/2005	177158	12202	47829	141531	10000
3	M10	N	P	10/20/2005	33	25971380158	9/01/2005 9/30/2005	141531	33472	47363	127639	10000

FEDERAL ELECTION COMMISSION  
OGC INDEX - (0) (2005-2006)

DATE 10/05/2007  
PAGE 3

NEVADA REPUBLICAN STATE CENTRAL COMMITTEE

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FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
3	M11	N	P	11/10/2005	34	25971453201	10/01/2005 10/31/2005	127639	15883	52378	91145	10000
3	M12	N	P	12/20/2005	45	25971654964	11/01/2005 11/30/2005	91145	12438	63213	40369	10000
3	YE	N	P	1/31/2006	44	26970046488	12/01/2005 12/31/2005	40369	34338	54348	20361	14558
3	M2	N	P	2/20/2006	47	26980138772	1/01/2006 1/31/2006	20361	45730	52586	13505	21717
3	M2	A	P	3/30/2006	51	26930020760	1/01/2006 1/31/2006	20361	45730	52586	13505	23717
3	M3	N	P	3/18/2006	41	26920010052	2/01/2006 2/28/2006	13505	141027	57571	96961	10000
3	M3	A	P	3/20/2006	41	26920062765	2/01/2006 2/28/2006	13505	141027	57571	96961	10000
3	M4	N	P	4/20/2006	67	26940101101	3/01/2006 3/31/2006	96961	39441	75857	60545	10000
3	M4	A	P	5/22/2006	69	26960118355	3/01/2006 3/31/2006	96961	39441	75857	60545	10000
3	M4	A	P	12/19/2006	73	26930742550	3/01/2006 3/31/2006	96961	39441	75857	60545	10000
3	M5	N	P	5/20/2006	68	26930146294	4/01/2006 4/30/2006	60545	55590	85384	30751	10000
3	M5	A	P	12/19/2006	69	26940926653	4/01/2006 4/30/2006	60545	55590	85384	30751	10000
3	M6	N	P	6/21/2006	70	26960163513	5/01/2006 5/31/2006	30751	137482	64270	103963	10000
3	M6	A	P	12/19/2006	70	26930742623	5/01/2006 5/31/2006	30751	137447	59762	108436	10000
3	M7	N	P	7/20/2006	70	26930294120	6/01/2006 6/30/2006	103963	141131	75026	170068	10000
3	M7	A	P	8/13/2006	75	26950409071	6/01/2006 6/30/2006	103963	141131	75026	170068	10000
3	M7	A	P	11/28/2006	71	26940605370	6/01/2006 6/30/2006	108436	133417	71432	170421	10000
3	M7	A	P	7/06/2007	71	27930868370	6/01/2006 6/30/2006	108436	133417	71432	170421	10000
3	M8	N	P	8/21/2006	60	26940305923	7/01/2006 7/31/2006	170068	63360	69223	164205	10000
3	M8	A	P	12/26/2006	64	26930754630	7/01/2006 7/31/2006	170421	63435	71754	162102	10000
3	M8	A	P	7/06/2007	64	27990188003	7/01/2006 7/31/2006	170421	63435	71754	162102	10000
3	M9	N	P	9/20/2006	44	26960392286	8/01/2006 8/31/2006	164205	292290	118721	337773	10000
3	M9	A	P	1/09/2007	80	27940035828	8/01/2006 8/31/2006	162102	292265	170150	284216	10000
3	M9	A	P	7/06/2007	80	27930868503	8/01/2006 8/31/2006	162102	292265	170150	284216	10000
3	M10	N	P	10/20/2006	49	26940511346	9/01/2006 9/30/2006	337773	277495	44827	570441	47044
3	M10	A	P	2/24/2007	78	27930168194	9/01/2006 9/30/2006	284216	278063	166746	395533	10000
3	M10	A	P	7/06/2007	79	27930868593	9/01/2006 9/30/2006	284216	278063	166746	395533	10000
3	12G	N	P	10/26/2006	77	26960650292	10/01/2006 10/18/2006	570441	252816	632993	190263	10000

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FEDERAL ELECTION COMMISSION  
OGC INDEX - (0) (2005-2006)

DATE 10/05/2007  
PAGE 4

NEVADA REPUBLICAN STATE CENTRAL COMMITTEE

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NV 89117

ID #C00082925

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
3	12G	A	P	2/24/2007	79	27930168272	10/01/2006 10/18/2006	395533	297001	581264	111269	10000
3	12G	A	P	4/27/2007	79	27990034102	10/01/2006 10/18/2006	395533	297001	581264	111269	10000
3	12G	A	P	7/06/2007	79	27930868672	10/01/2006 10/18/2006	395533	297001	581264	111269	10000
3	30G	N	P	12/07/2006	134	26930713348	10/19/2006 11/27/2006	55209-	985444	1147927	217692-	10000
3	30G	A	P	2/24/2007	114	27930168351	10/19/2006 11/27/2006	111269	535612	613037	33844	10000
3	30G	A	P	4/27/2007	114	27990034181	10/19/2006 11/27/2006	111269	581432	658857	33844	10000
3	30G	A	P	7/06/2007	114	27990188120	10/19/2006 11/27/2006	111269	581432	658857	33844	10000
3	YE	N	P	1/30/2007	44	27960029042	11/28/2006 12/31/2006	33844	101632	94155	41321	10000
3	YE	A	P	2/24/2007	46	27930168465	11/28/2006 12/31/2006	33844	101632	94155	41321	10000
3	YE	A	P	4/27/2007	46	27930687639	11/28/2006 12/31/2006	33844	103218	95741	41321	10000
3	YE	A	P	7/06/2007	46	27930868752	11/28/2006 12/31/2006	33844	103218	95741	41321	10000
TOTAL									2451531	2724566		

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**Nevada Republican State Central Committee (C00082925)**  
**2006 September Monthly Report/Amended 2006 September Monthly Report**  
**Overview of Additional Disbursements**

Report Line	Original 2006 September Monthly Report (Image 26960392289)	Amended 2006 September Monthly Report, Received 7/6/07 (Image 27930868506)	Variance Amount
Line 21(a)(i)	\$23,066.02	\$11,134.74	-\$11,931.28
Line 21(a)(ii)	\$31,005.87	\$41,887.96	\$10,882.09
Line 21(b)	\$63,841.19	\$42,550.63	-\$21,290.56
Line 30(a)(i)	\$0.00	\$9,075.34	\$9,075.34
Line 30(a)(ii)	\$0.00	\$34,140.55	\$34,140.55
Line 30(b)	\$808	\$31,361.49	\$30,553.49
<b>TOTAL</b>	<b>\$118,721.08</b>	<b>\$170,150.71</b>	<b>\$51,429.63</b>

**2006 October Monthly Report/Amended 2006 October Monthly Report**  
**Overview of Additional Disbursements**

Report Line	Original 2006 October Monthly Report (Image 26940511349)	Amended 2006 October Monthly Report, Received 7/6/07 (Image 27930868596)	Variance Amount
Line 21(a)(i)	\$7,610.50	\$9,080.63	\$1,470.13
Line 21(a)(ii)	\$28,629.95	\$34,160.43	\$5,530.48
Line 21(b)	\$8,362.50	\$5,811.69	-\$2,550.81
Line 28(a)	\$225	\$815	\$590.00
Line 29	\$0.00	\$5,145	\$5,145.00
Line 30(a)(i)	\$0.00	\$13,413.01	\$13,413.01
Line 30(a)(ii)	\$0.00	\$50,458.49	\$50,458.49
Line 30(b)	\$0.00	\$47,862.39	\$47,862.39
<b>TOTAL</b>	<b>\$44,827.95</b>	<b>\$166,746.64</b>	<b>\$121,918.69</b>