

REPORTS ANALYSIS REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: January 23, 2008

ANALYST: Christopher Morse

- I. COMMITTEE: Montana Republican State Central Committee
C00008086
Shirley J. Warehime, Treasurer
P.O. Box 935
921 Euclid Avenue
Helena, MT 59624
- TYPE OF COMMITTEE Qualified Party
- II. REGISTRATION: January 1, 1975
- III. BACKGROUND:

The Committee was sent (26) Requests for Additional Information (RFAs) for reporting errors involving Excessive, Prohibited and Other Impermissible Contributions and Transfers, Mathematical Discrepancies, Failure to Provide Supporting Schedules, Federal Election Activity/Levin Funds and Allocated Federal and Non-Federal Activity.

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DATE: January 23, 2008

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TO
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- I. COMMITTEE:** Montana Republican State Central Committee
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- TYPE OF COMMITTEE** Qualified Party
- II. REGISTRATION:** January 1, 1975
- III. SUMMARY OF RFAI RESPONSES:** The Committee did not respond, responded inadequately or provided a late adequate response to thirteen (13) of twenty-six (26) RFAs sent in the 2005-2006 election cycle.

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VIOLATION DESCRIPTION	REPORT(S)	DETAILS OF VIOLATION
Excessive, Prohibited and Other Impermissible Contributions and Transfers	2006 M9	Schedule A of the Committee's report disclosed the receipt of funds from an apparent corporation totaling \$4,998.82.
Excessive, Prohibited and Other Impermissible Contributions and Transfers	2006 30G	Schedule A of the Committee's report disclosed the receipt of impermissible contributions totaling \$5,000.00. This contribution was received from one (1) labor organization.
Mathematical Discrepancies	2005 M4	The Committee's report contained mathematical discrepancies totaling \$47,947.44.
Mathematical Discrepancies	2006 M9	The Committee's report contained mathematical discrepancies totaling \$750,668.68.
Mathematical Discrepancies	2006 M10	<p>The Committee's report contained mathematical discrepancies totaling \$914,400.89.</p> <ul style="list-style-type: none"> • The Committee's beginning cash balance, \$211,116.33, is less than the ending cash balance of the Committee's previous report, \$248,669.94, a discrepancy of \$37,553.61. • The Committee's report contained Column B discrepancies totaling \$854,564.52. • Line 8, Column A, \$320,251.14, of the Summary Page did not equal Line 8, Column B, \$342,533.90, of the Summary Page, a discrepancy of \$22,282.76.
Failure to Provide Supporting Schedules	2006 Amended M7, received 8/17/06	The Committee's report disclosed additional disbursements totaling \$14,547.93 for the reporting period.
Failure to Provide Supporting Schedules	2006 Amended M9, received 4/23/07	The Committee's report disclosed additional disbursements totaling \$37,691.94 for the reporting period.
Federal Election Activity/Levin Funds	2005 M7	The Committee disclosed disbursements totaling \$77,120.70; however, the report failed to disclose payments for salary or wages as Federal Election Activity on Schedule B for Line 30(b) of the Detailed Summary Page.
Federal Election Activity/Levin Funds	2005 M10	The Committee disclosed disbursements totaling \$103,997.83; however, the report failed to disclose payments for salary or wages as Federal Election Activity on Schedule B for Line 30(b) of the Detailed Summary Page.

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Federal Election Activity/Levin Funds	2006 M9	On Schedule B for Line 21(b), the Committee disclosed \$17,712.82 in disbursements made for "BULK PERMIT FEES," "POSTAGE BUSINESS REPLY ACCOUNT," "POSTAGE FUND RAISING," and "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.
Federal Election Activity/Levin Funds	2006 M10	<p>The Committee failed to provide an adequate purpose for disbursements to one (1) vendor totaling \$16,905.01.</p> <p>On Schedule B for Lines 21(b) and 30(b), the Committee disclosed \$118,647.72 in disbursements made for apparent FEA public communications 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.</p> <p>On Schedule B for Line 21(b), the Committee disclosed \$1,103.25 in disbursements made for "POST CARD STAMPS," but failed to clarify whether the activity met the definition of Federal Election Activity and if the activity met the conditions of exempt party activity.</p>
Federal Election Activity/Levin Funds	2006 YE	<p>The Committee disclosed \$4,952.00 in disbursements made for "BANQUET EVENT" and "BANQUET RENTAL" on Schedule B, but failed to clarify whether these disbursements were made on behalf of specifically identified federal candidates.</p> <p>On Schedule B for Line 21(b), the Committee disclosed \$13,566.19 in disbursements made for apparent FEA public communications 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.</p>
Allocated Federal and Non-Federal Activity	2006 M4	<p>The Committee failed to clarify whether the appropriate category was used for payments totaling \$89,245.75 that are categorized on Schedule H4 as Administrative expenses with purposes indicating they are Generic Voter Drive expenses.</p> <p>Schedule B for Lines 21(b) and 30(b) disclosed \$4,008.31 for apparent reimbursements to individuals; however, the Committee did not provide sufficient</p>

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		MEMO entries to itemize vendors, resulting in a \$4,008.31 discrepancy.
Allocated Federal and Non-Federal Activity	2006 Amended 12P, received 7/25/06	Schedule H4 disclosed an event year-to-date total for Administrative expenses of \$44,040.69; however, FEC calculations disclose this total to be \$133,286.44, resulting in a discrepancy of \$89,245.75.
Allocated Federal and Non-Federal Activity	2006 M6	Schedule H4 disclosed an event year-to-date total for Administrative expenses of \$140,991.55; however, FEC calculations disclose this total to be \$51,745.80, resulting in a discrepancy of \$89,245.75.
Allocated Federal and Non-Federal Activity	2006 M7	Schedule H4 disclosed an event year-to-date total for Administrative expenses of \$64,451.89; however, FEC calculations disclose this total to be \$153,697.64, resulting in a discrepancy of \$89,245.75.

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