

## REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: May 1, 2008

ANALYST: Daniel T. Buckley

I. COMMITTEE: New Jersey Republican State Committee  
C00164418  
Priscilla B. Anderson, Treasurer  
150 West State Street, Suite 230  
Trenton, NJ 08608

II. RELEVANT STATUTE: 2 U.S.C. §434(b)(4)(A)  
2 U.S.C. §434(b)(4)(H)(v)  
2 U.S.C. §434(e)(2)(A)  
11 C.F.R. §104.3(b)(1)(i)(A) and (B)  
11 C.F.R. §300.36(b)(2)(i)  
11 C.F.R. §300.36(b)(2)(iv)

## III. BACKGROUND:

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

The New Jersey Republican State Committee ("The Committee") filed an Amended 2006 30 Day Post-General Report on April 11, 2007 disclosing additional disbursements totaling \$415,248.29 (Attachment 2).

On December 7, 2006, the Committee filed its original 2006 30 Day Post-General Report covering October 19, 2006 through November 27, 2006 (Image 26930627626). The original report disclosed \$41,134.79 on Line 21(b) (Other Federal Operating Expenditures), \$204,950.07 on Line 30(a)(i) (Federal Share of Allocated Federal Election Activity), \$54,480.40 on Line 30(a)(ii) (Levin Share of Allocated Federal Election Activity) and \$519,384.89 on Line 30(b) (Federal Election Activity Paid Entirely with Federal Funds) of the Detailed Summary Page<sup>1</sup> (Image 26930627629).

<sup>1</sup> The total from Line 21(a)(i) is not disclosed in the referral because it includes \$204,950.07 in disbursements which are duplicated in the total for Line 30(a)(i) and later removed from Line 21(a)(i) on the Committee's 3/30/07

29190280846

On March 21, 2007, the Committee filed an Amended 2006 30 Day Post-General Report covering October 19, 2006 through November 27, 2006 (Image 27930360985). This report disclosed \$44,552.27 on Line 21(b) (Other Federal Operating Expenditures), \$240,702.91 on Line 30(a)(i) (Federal Share of Allocated Federal Election Activity), \$63,984.31 on Line 30(a)(ii) (Levin Share of Allocated Federal Election Activity) and \$885,958.95<sup>2</sup> on Line 30(b) (Federal Election Activity Paid Entirely with Federal Funds) of the Detailed Summary Page<sup>3</sup> (Image 27930360988).

On March 30, 2007, the Committee filed an Amended 2006 30 Day Post-General Report covering October 19, 2006 through November 27, 2006 (Image 27930389387). This report disclosed no change in the amount of disbursements made by the Committee from what was disclosed on the March 21, 2007 amendment<sup>4</sup> (Image 27930389390).

On April 11, 2007, the Committee filed an Amended 2006 30 Day Post-General Report covering October 19, 2006 through November 27, 2006 (Image 27930488402). This report disclosed no change in the amount of disbursements made by the Committee from what was disclosed on the March 30, 2007 amendment (Image 27930488405).

On December 12, 2007, a Request for Additional Information ("RFAI") was sent to the Committee referencing the Amended 2006 30 Day Post-General Report, received April 11, 2007. The RFAI asked for clarification regarding the \$415,248.29 in additional disbursements that were not disclosed on the Committee's original 2006 30 Day Post-General Report (Image 27039572800).

On January 14, 2008, the Committee filed a miscellaneous electronic submission (Form 99) which stated, "Please be advised that at the time of the December 7th, 2006 filing date approximately 3600 GOTV checks still had to be entered in our data. All entries were completed and promptly filed with the FEC along with FEC's preliminary review dated February 2007" (Image 28930035522).

On January 23, 2008, the Reports Analysis Division (RAD) Analyst called the Committee regarding the Committee's possible referral to the Office of General Counsel. The Analyst advised Charlene Hooker, the Committee's Deputy Treasurer, that the matter of increased disbursements on the Committee's Amended 2006 30 Day Post-General Report was

---

amendment. The total from Line 21(a)(ii) is not disclosed in the referral because it includes \$54,480.40 in disbursements which are duplicated in the total for Line 30(a)(ii) and later removed from Line 21(a)(ii) on the Committee's 3/30/07 amendment.

<sup>2</sup> The total on Line 30(b) includes \$246,363.23 in disbursements originally reported on the Committee's original 2006 Year End Report covering November 28, 2006 through December 31, 2006 and filed on January 31, 2007 (Images 27960034613-14)

<sup>3</sup> The total from Line 21(a)(i) is not disclosed in the referral because it includes \$240,702.91 in disbursements which are duplicated in the total for Line 30(a)(i) and later removed from Line 21(a)(i) on the Committee's 3/30/07 amendment. The total from Line 21(a)(ii) is not disclosed in the referral because it includes \$63,984.31 in disbursements which are duplicated in the total for Line 30(a)(ii) and later removed from Line 21(a)(ii) on the Committee's 3/30/07 amendment.

<sup>4</sup> The totals on Lines 21(a)(i) and 21(a)(ii) are not disclosed in the referral because they reflect the removal of \$240,702.91 and \$63,984.31 from those respective lines, as a result of duplicate entries on Lines 30(a)(i) and 30(a)(ii), respectively.

referable to the Office of General Counsel. The RAD Analyst asked Ms. Hooker to provide any further clarification regarding this matter within one week (Attachment 3).

On January 29, 2008, the RAD Analyst was contacted by Mark Sheraton, an attorney for the Committee. Mr. Sheraton stated that he believed many of the additional disbursements included on the Amended 2006 30 Day Post-General Report were checks that were not cashed at the time of original filing. The RAD Analyst stated that the issue was referable to the Office of General Counsel and advised Mr. Sheraton that any additional clarification regarding this matter should be submitted within one week (Attachment 3).

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

29190280848

NEW JERSEY REPUBLICAN STATE COMMITTEE

Priscilla B. Anderson

150 West State Street Suite 230 Trenton

PARTY QUALIFIED

ID #C00164418

FILING FREQUENCY: MONTHLY

NJ 08608

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

1			A	4/14/2005	4	25990457664						
1			A	7/27/2005	6	25970784878						
1			A	5/25/2006	6	26940168359						
1			A	6/06/2006	6	26960135285						
1			A	10/02/2006	4	26940372624						

MS			T	2/02/2005	1	25970142731						
MS			M	2/23/2005	1	25990097563						
MS			T	3/07/2005	1	25980443329						
MS			O	3/08/2005	2	25038750926						
MS			T	3/24/2005	1	25970204308						
MS			M	1/31/2006	1	26990215811						
MS			O	2/08/2006	2	26038992045						

RQ	M2	2		7/13/2005	3	25038834918	1/01/2005	1/31/2005				
RQ	MY	2		8/26/2005	5	25038890968	2/01/2005	6/30/2005				
RQ	YE	2		3/17/2006	4	26039014127	7/01/2005	12/31/2005				
RQ	YE	2		5/10/2006	3	26039073745	7/01/2005	12/31/2005				
RQ	M4	2		5/05/2006	4	26039071594	3/01/2006	3/31/2006				
RQ	M5	2		6/02/2006	3	26039092845	4/01/2006	4/30/2006				
RQ	M6	2		7/05/2006	3	26039104485	5/01/2006	5/31/2006				
RQ	M6	2		9/13/2006	3	26039182337	5/01/2006	5/31/2006				
RQ	M7	2		9/08/2006	5	26039181192	6/01/2006	6/30/2006				
RQ	M7	2		12/29/2006	3	27039323023	6/01/2006	6/30/2006				
RQ	M8	2		9/13/2006	3	26039182340	7/01/2006	7/31/2006				
RQ	M8	2		11/08/2006	3	26039270977	7/01/2006	7/31/2006				
RQ	M9	2		11/08/2006	3	26039270980	8/01/2006	8/31/2006				
RQ	M10	2		11/08/2006	4	26039270973	9/01/2006	9/30/2006				
RQ	12G	2		1/03/2007	4	27039324298	10/01/2006	10/18/2006				

NEW JERSEY REPUBLICAN STATE COMMITTEE  
Christilla B. Anderson  
BILING FREQUENCY: MONTHLY

150 West State Street Suite 230 Trenton

PARTY QUALIFIED  
NJ 08608

ID #C00164418

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
RQ	30G	2		2/13/2007	9	27039390051	10/19/2006 11/27/2006					
RQ	30G	2		12/12/2007	3	27039572800	10/19/2006 11/27/2006					
RQ	YE	2		3/21/2007	6	27039404507	11/28/2006 12/31/2006					
3	M2	N	P	2/23/2005	63	25980434532	1/01/2005 1/31/2005	15083	102435	42340	75178	0
3	M2	A	P	7/20/2005	65	25980594053	1/01/2005 1/31/2005	15083	102435	48412	69106	0
3	M2	A	P	6/09/2006	66	26960136366	1/01/2005 1/31/2005	15083	102560	48412	69231	0
3	MY	N	P	7/27/2005	106	25970784479	2/01/2005 6/30/2005	69106	134209	174848	28467	0
3	MY	A	P	9/21/2005	108	25971084272	2/01/2005 6/30/2005	69106	134209	174848	28467	0
3	MY	A	P	6/09/2006	106	26960136432	2/01/2005 6/30/2005	69231	134744	174948	29027	0
3	YE	N	P	1/31/2006	143	26990215532	7/01/2005 12/31/2005	28467	285231	251920	61777	0
3	YE	A	P	4/17/2006	145	26930074124	7/01/2005 12/31/2005	28467	285231	251920	61777	0
3	YE	A	P	6/09/2006	144	26950145306	7/01/2005 12/31/2005	29027	285231	252299	61959	0
3	M2	N	P	2/16/2006	35	26980112321	1/01/2006 1/31/2006	61777	61929	58088	65618	0
3	M2	A	P	5/15/2006	34	26940139912	1/01/2006 1/31/2006	61777	61834	58088	65523	0
3	M3	N	P	3/17/2006	35	26990339135	2/01/2006 2/28/2006	65618	27747	59142	34224	0
3	M3	A	P	5/15/2006	35	26960102865	2/01/2006 2/28/2006	65523	27747	59142	34129	0
3	M4	N	P	4/20/2006	38	26980074988	3/01/2006 3/31/2006	34224	51982	64581	21625	0
3	M4	A	P	5/17/2006	38	26940141756	3/01/2006 3/31/2006	34129	51982	64581	21530	0
3	M5	N	P	5/19/2006	32	26950121437	4/01/2006 4/30/2006	21530	67542	65778	23294	0
3	M5	A	P	7/18/2006	35	26960237249	4/01/2006 4/30/2006	21530	67437	65778	23189	0
3	M6	N	P	6/20/2006	50	26950182813	5/01/2006 5/31/2006	23189	108496	54489	77196	0
3	M6	A	P	7/18/2006	50	26940262952	5/01/2006 5/31/2006	23189	108496	54489	77196	0
3	M6	A	P	10/05/2006	49	26960425195	5/01/2006 5/31/2006	23189	108496	54489	77196	0
3	M7	N	P	7/20/2006	79	26950354265	6/01/2006 6/30/2006	77196	266863	148040	196018	0
3	M7	A	P	10/10/2006	77	26940399657	6/01/2006 6/30/2006	77196	266863	148040	196018	0
3	M7	A	P	12/08/2006	76	26930724598	6/01/2006 6/30/2006	77196	266863	148040	196018	0
3	M7	A	P	1/30/2007	76	27950026651	6/01/2006 6/30/2006	77196	266863	148040	196018	0
3	M8	N	P	8/18/2006	48	26930335883	7/01/2006 7/31/2006	196018	108609	104243	200383	0

NEW JERSEY REPUBLICAN STATE COMMITTEE

Christilla B. Anderson

150 West State Street Suite 230 Trenton

PARTY QUALIFIED

ID #C00164418

FILING FREQUENCY: MONTHLY

NJ 08608

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
3	M8	A	P	10/16/2006	47	26950593529	7/01/2006 7/31/2006	196018	108634	104243	200408	0
3	M8	A	P	12/08/2006	47	26930724695	7/01/2006 7/31/2006	196018	108634	104243	200408	0
3	M9	N	P	9/20/2006	49	26960383159	8/01/2006 8/31/2006	200383	109083	96894	212572	0
3	M9	A	P	12/08/2006	48	26930725390	8/01/2006 8/31/2006	200408	109083	96894	212597	0
3	M10	N	P	10/20/2006	55	26940500678	9/01/2006 9/30/2006	212572	123779	210933	125417	0
3	M10	A	P	12/11/2006	56	26930727624	9/01/2006 9/30/2006	212597	123779	210933	125442	0
3	12G	N	P	10/28/2006	59	26950731360	10/01/2006 10/18/2006	125081	339796	129823	335053	0
3	12G	A	P	2/05/2007	62	27930125801	10/01/2006 10/18/2006	125442	340796	130823	335415	0
3	12G	A	P	3/20/2007	61	27930338443	10/01/2006 10/18/2006	125442	340796	137013	329224	0
30G	N	P	12/07/2006	355	26930627626	10/19/2006 11/27/2006	335053	1426810	1101716	660147	0	
30G	A	P	3/21/2007	490	27930360985	10/19/2006 11/27/2006	329224	1450090	1562221	217093	0	
30G	A	P	3/30/2007	493	27930389387	10/19/2006 11/27/2006	329224	1450090	1257534	521780	0	
30G	A	P	4/11/2007	492	27930488402	10/19/2006 11/27/2006	329224	1430322	1257534	502012	0	
YE	N	P	1/31/2007	45	27980034596	11/28/2006 12/31/2006	659147	11764	366347	304564	0	
YE	A	P	4/12/2007	47	27930501086	11/28/2006 12/31/2006	502012	11764	129564	384212	0	
TOTAL									3231272	2861958		

FEDERAL ELECTION COMMISSION  
OGC INDEX - (0) (2007-2008)

DATE 5/01/2008  
PAGE 1

NEW JERSEY REPUBLICAN STATE COMMITTEE  
Priscilla B. Anderson  
FILING FREQUENCY: MONTHLY

150 West State Street Suite 230 Trenton

PARTY QUALIFIED  
NJ 08608

ID #C00164418

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
MS			T	11/19/2007	1	27931585668						
MS			T	1/14/2008	1	28930035522						
MS			T	3/20/2008	1	28990622601						
RQ	M2	2		6/13/2007	3	27039452730	1/01/2007 1/31/2007					
RQ	M3	2		6/13/2007	3	27039452727	2/01/2007 2/28/2007					
RQ	M4	2		6/13/2007	3	27039452724	3/01/2007 3/31/2007					
RQ	M9	2		10/17/2007	3	27039550650	8/01/2007 8/31/2007					
RQ	M11	2		11/28/2007	3	27039570574	10/01/2007 10/31/2007					
RQ	YE	2		2/20/2008	4	28039641507	12/01/2007 12/31/2007					
	M2	N	P	2/20/2007	43	27960066821	1/01/2007 1/31/2007	297846	7250	67176	237920	0
	M2	A	P	4/18/2007	43	27930644744	1/01/2007 1/31/2007	384212	7250	67176	324286	0
	M2	A	P	7/16/2007	44	27930941758	1/01/2007 1/31/2007	384212	7250	67176	324286	0
	M3	N	P	3/20/2007	30	27930339044	2/01/2007 2/28/2007	237920	0	61262	176657	0
	M3	A	P	4/19/2007	30	27930657213	2/01/2007 2/28/2007	324286	0	61262	263023	0
	M3	A	P	7/16/2007	31	27930941088	2/01/2007 2/28/2007	324286	0	61262	263023	0
	M3	A	P	7/16/2007	30	27990302354	2/01/2007 2/28/2007	324286	0	61262	263023	0
	M4	N	P	4/20/2007	31	27990019833	3/01/2007 3/31/2007	263023	0	66507	196516	0
	M4	A	P	7/23/2007	32	27930998569	3/01/2007 3/31/2007	263023	0	66507	196516	0
	M5	N	P	5/21/2007	30	27930740365	4/01/2007 4/30/2007	196516	3150	72437	127229	0
	M5	A	P	7/23/2007	31	27930998601	4/01/2007 4/30/2007	196516	3150	72437	127229	0
	M6	N	P	6/20/2007	29	27990168336	5/01/2007 5/31/2007	127229	39000	109841	56387	0
	M6	A	P	7/23/2007	30	27930998692	5/01/2007 5/31/2007	127229	39000	109841	56387	0
	M7	N	P	7/23/2007	37	27930998841	6/01/2007 6/30/2007	56387	42651	64532	34505	0
	M7	A	P	8/20/2007	36	27990500156	6/01/2007 6/30/2007	56387	42000	64532	33854	0
	M8	N	P	8/20/2007	18	27990501472	7/01/2007 7/31/2007	33854	0	18428	15425	0

FEDERAL ELECTION COMMISSION  
OGC INDEX - (0) (2007-2008)

DATE 5/01/2008  
PAGE 2

NEW JERSEY REPUBLICAN STATE COMMITTEE  
Christilla B. Anderson  
FILING FREQUENCY: MONTHLY

150 West State Street Suite 230 Trenton

PARTY QUALIFIED  
NJ 08608

ID #C00164418

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES		BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
3	M9	N	P	9/20/2007	21	27931214401	8/01/2007	8/31/2007	15425	7784	12121	11089	0
3	M10	N	P	10/22/2007	17	27990867375	9/01/2007	9/30/2007	11089	24	4258	6854	0
3	M11	N	P	11/20/2007	13	27931605313	10/01/2007	10/31/2007	6854	17102	6007	17949	0
3	M11	A	P	12/06/2007	14	27990993591	10/01/2007	10/31/2007	6854	17102	6007	17949	0
3	M12	N	P	12/20/2007	19	27991047275	11/01/2007	11/30/2007	17949	14790	17600	15140	0
3	YE	N	P	1/31/2008	15	28930285732	12/01/2007	12/31/2007	15140	29851	23318	21672	0
3	M2	N	P	2/20/2008	13	28990484070	1/01/2008	1/31/2008	21672	0	14698	6974	0
3	M3	N	P	3/18/2008	10	28990608544	2/01/2008	2/29/2008	6974	1170	5334	2809	0
3	M4	N	P	4/18/2008	15	28990866814	3/01/2008	3/31/2008	2809	7500	6092	4217	0
TOTAL										169621	549611		



**New Jersey Republican State Committee (C00164418)**  
**2006 30 Day Post-General Report/Amended 2006 30 Day Post-General Report**

**Overview of Additional Disbursements**

Report Line	Original 2006 30 Day Post-General Report (Image 26930627629)	Amended 2006 30 Day Post-General Report, received 4-11-07 (Image 27930488405)	Disbursement Variance Amount
Line 21(b): Other Federal Operating Expenditures	\$41,134.79	\$44,552.27	\$3,417.48
Line 30(a)(i): Federal Share of Allocated FEA	\$204,950.07	\$240,702.91	\$35,752.84
Line 30(a)(ii): Levin Share of Allocated FEA	\$54,480.40	\$63,984.31	\$9,503.91
Line 30(b): FEA Paid Entirely With Federal Funds	\$519,384.89	\$885,958.95	\$366,574.06

29190280854