

REPORTS ANALYSIS DIVISION REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: May 17, 2017

ANALYST: Laura E. Sinram

I. COMMITTEE:

Democratic Party of New Mexico
(C00161810)
Robert Lara, Treasurer
322 Adams St SE
Albuquerque, NM 87108

II. RELEVANT STATUTE:

52 U.S.C. § 30104(b)(4)
11 CFR §104.3(b)

III. BACKGROUND:

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

The Democratic Party of New Mexico ("the Committee") amended its 2016 September Monthly Report to disclose additional disbursements of \$600,000.00, which were not disclosed on the original report (Attachment2).

On September 20, 2016, the Committee filed the original 2016 September Monthly Report covering the period from August 1, 2016 through August 31, 2016. The report disclosed \$0.00 in disbursements on Line 22 (Transfers to Affiliated/Other Party Committees) of the Detailed Summary Page (Image 201609209031041105).

On December 6, 2016, the Committee filed an Amended 2016 September Monthly Report. The report disclosed \$600,000.00 in disbursements on Line 22, an increase of \$600,000.00 in disbursements from the original report (Image 201612069037665592, Attachment 2). The Committee included memo text attached to the report stating, in part, "This report is being amended for updates to the transfers from DPNM to the DNC for the Hillary Victory Fund" (Image 201612069037665594).

On February 6, 2017, a Request for Additional Information (RAFI) was sent to the Committee referencing the Amended 2016 September Monthly Report, received

December 6, 2016. The RFAI requested clarification regarding the substantial increase in disbursements disclosed on the Amended 2016 September Monthly Report (Image 201702070300077127).

On March 7, 2017, Rebecca Bliss, the Committee's Assistant Treasurer, called the Reports Analysis Division (RAD) Analyst in reference to the RFAI sent on the Amended September Monthly Report, received December 6, 2016. Among other items, the Analyst advised Ms. Bliss that the Committee could provide additional or clarifying information for the public record (Attachment 3).

On March 23, 2017, the Analyst called Ms. Bliss in reference to the RFAI sent on the Amended September Monthly Report, received December 6, 2016, and left a message again advising the Committee that it could provide additional or clarifying information for the public record. The Analyst explained that this issue was referable for potential further action within the Commission and asked for a return call (Attachment 3).

Subsequently on March 23, 2017, Ms. Bliss left a message in reference to the Analyst's earlier call stating that she understood the Committee was being referred for potential further action for an increase in disbursements. She said that she would let the Analyst know if the Committee planned to respond (Attachment 3).

On March 27, 2017, Ms. Bliss left a message in reference to the referral for potential further action on the Amended 2016 September Monthly Report, received December 6, 2016, stating that the Committee was not going to place additional information on the public record at this time (Attachment 3).

To date, no further communications have been received from the Committee regarding this matter.

O-Index (2017-2018)															
Cmte. ID: C00161810 Cmte. Name: DEMOCRATIC PARTY OF NEW MEXICO															
Treasurer Name: LARA, ROBERT Address: 322 ADAMS ST SE, ALBUQUERQUE, NM 87108															
Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: MONTHLY FILER															
Cmte. Type: Y (QUALIFIED PARTY)															
Form Tpl	Rpt Tp	Alt	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
F3XN	M2	N	2/17/2017	47	20170217904911719	1/1/2017	1/31/2017		\$21,591	\$72,692	\$64,780	\$29,502	\$4,619	-	\$4,619
F3XA	M2	A	3/20/2017	48	201703209050955747	1/1/2017	1/31/2017		\$35,891	\$72,692	\$64,780	\$43,802	\$4,619	-	\$4,619
F3XN	M3	N	3/20/2017	48	201703209050907063	2/1/2017	2/28/2017		\$43,802	\$57,299	\$44,584	\$56,518	\$4,619	-	\$4,619
F3XN	M4	N	4/20/2017	36	201704209052244851	3/1/2017	3/31/2017		\$56,518	\$42,668	\$42,754	\$56,432	\$2,200	-	\$2,200
F1A	A	A	3/27/2017	7	20170302805050527				-	-	-	-	-	-	-
F1A	A	A	3/28/2017	8	201703289050890080				-	-	-	-	-	-	-
Totals									\$172,660	\$172,660	\$152,119				

O-Index (2015-2016)															
Cmte. ID: C00151810 Cmte. Name: DEMOCRATIC PARTY OF NEW MEXICO															
Treasurer Name: LARA, ROBERT Address: 322 ADAMS ST SE, ALBUQUERQUE, NM 87108															
Cmte. Type: Y (QUALIFIED PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: MONTHLY FILER															
Form Tpl	Rpt Tpl	Alt	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T			1/26/2015	1	15950085652				-	-	-	-	-	-	-
MS-T			3/3/2015	1	159500835531				-	-	-	-	-	-	-
MS-M			5/19/2015	1	15970709516				-	-	-	-	-	-	-
MS-O			5/20/2015	2	15330083131				-	-	-	-	-	-	-
MS-T			6/20/2015	1	15951517146				-	-	-	-	-	-	-
MS-O			6/22/2015	2	15330083949				-	-	-	-	-	-	-
MS-T			1/11/2016	1	201601119000449490				-	-	-	-	-	-	-
MS-M			1/30/2016	1	2016013090004958828				-	-	-	-	-	-	-
MS-O			2/15/2016	2	201602160300036200				-	-	-	-	-	-	-
MS-T			4/20/2016	4	201604270300071871				-	-	-	-	-	-	-
MS-T			6/6/2016	1	201606069017471199				-	-	-	-	-	-	-
RQ7	M5		6/4/2015	2	15330083538	4/30/2015	6/4/2015	6/4/2015	\$6,542	\$67,153	\$66,803	\$6,893	\$55,449	-	\$55,449
RQ2	Q2	N	8/12/2015	3	201508120300001989	4/1/2015	6/30/2015	8/12/2015	\$6,542	\$67,153	\$66,803	\$6,893	\$55,449	-	\$55,449
RQ2	Q2	A	12/30/2015	2	201512300300009030	4/1/2015	6/30/2015	12/30/2015	\$6,542	\$67,153	\$66,803	\$6,893	\$109,787	-	\$109,787
RQ2	M2	A	4/7/2016	4	2016040703000041380	1/1/2016	1/31/2016	4/7/2016	\$6,893	\$35,802	\$32,215	\$10,480	\$63,568	-	\$63,568
RQ2	M4	N	5/17/2016	2	201605170300047134	3/1/2016	3/31/2016	5/17/2016	\$6,893	\$35,802	\$32,215	\$10,480	\$63,568	-	\$63,568
RQ2	M5	N	8/22/2016	2	201608220300057385	4/1/2016	4/30/2016	8/22/2016	\$6,893	\$35,802	\$32,215	\$10,480	\$126,024	-	\$126,024
RQ2	M6	N	8/24/2016	2	201608240300057511	5/1/2016	5/31/2016	8/24/2016	\$6,893	\$35,802	\$32,215	\$10,480	\$126,024	-	\$126,024
RQ2	M8	A	2/6/2017	2	201702070300077127	8/1/2016	8/31/2016	2/6/2017	\$6,542	\$67,153	\$66,803	\$6,893	\$55,449	-	\$55,449
F3XN	M2	N	2/20/2015	62	159500821798	1/1/2015	1/31/2015	1/31/2015	\$6,542	\$67,153	\$66,803	\$6,893	\$55,449	-	\$55,449
F3XA	M2	A	6/12/2015	62	15951468016	1/1/2015	1/31/2015	1/31/2015	\$6,542	\$67,153	\$66,803	\$6,893	\$109,787	-	\$109,787
F3XA	M2	A	4/4/2016	63	201604049012220890	1/1/2015	1/31/2015	1/31/2015	\$6,542	\$67,153	\$66,803	\$6,893	\$109,787	-	\$109,787
F3XN	M3	N	3/19/2015	39	15970306368	2/1/2015	2/28/2015	2/28/2015	\$6,893	\$35,802	\$32,215	\$10,480	\$63,568	-	\$63,568
F3XA	M3	A	6/12/2015	39	15951468078	2/1/2015	2/28/2015	2/28/2015	\$6,893	\$35,802	\$32,215	\$10,480	\$63,568	-	\$63,568
F3XA	M3	A	4/4/2016	37	201604049012221022	2/1/2015	2/28/2015	2/28/2015	\$6,893	\$35,802	\$32,215	\$10,480	\$126,024	-	\$126,024
F3XN	M4	N	4/20/2015	104	15970674137	3/1/2015	3/31/2015	3/31/2015	\$10,480	\$26,958	\$33,642	\$3,795	\$64,787	-	\$64,787
F3XA	M4	A	6/12/2015	103	15971205514	3/1/2015	3/31/2015	3/31/2015	\$10,480	\$26,958	\$33,642	\$3,795	\$64,787	-	\$64,787
F3XA	M4	A	4/1/2016	103	201604019012217045	3/1/2015	3/31/2015	3/31/2015	\$10,480	\$26,958	\$33,642	\$3,795	\$128,463	-	\$128,463
F3XN	Q2	N	7/31/2015	63	201507319000545533	4/1/2015	6/30/2015	6/30/2015	\$3,795	\$65,805	\$67,334	\$2,267	\$52,392	-	\$52,392
F3XA	Q2	A	9/16/2015	68	201509169012679036	4/1/2015	6/30/2015	6/30/2015	\$3,795	\$95,005	\$97,097	\$11,704	\$35,782	-	\$35,782
F3XA	Q2	A	1/30/2016	71	2016013090004959063	4/1/2015	6/30/2015	6/30/2015	\$3,795	\$102,505	\$94,659	\$11,642	\$34,311	-	\$34,311

5/3/2017 8:46 AM

O-index (2013-2014)

Page 2 of 3
Attachment 1

F3XX	M3	N	3/19/2013	52	13951178169	2/1/2013	2/28/2013	\$49,906	\$59,355	\$24,368	\$8,210
F3XX	M4	N	4/19/2013	50	13951682368	3/1/2013	3/31/2013	\$33,784	\$37,441	\$20,711	\$2,110
F3XX	M5	N	5/20/2013	43	13952487046	4/1/2013	4/30/2013	\$38,720	\$48,603	\$10,828	\$5,612
F3XX	M6	N	6/20/2013	41	13953155849	5/1/2013	5/31/2013	\$28,274	\$23,274	\$15,829	\$3,725
F3XX	M7	N	7/19/2013	36	13954424353	6/1/2013	6/30/2013	\$27,235	\$22,664	\$20,399	\$3,648
F3XX	M8	N	8/20/2013	49	13941471949	7/1/2013	7/31/2013	\$15,460	\$59,609	\$15,460	\$1,049
F3XX	M9	N	9/18/2013	64	13941595972	8/1/2013	8/31/2013	\$50,435	\$48,312	\$16,583	\$5,549
F3XX	M10	N	10/19/2013	68	13942145714	9/1/2013	9/30/2013	\$46,682	\$58,873	\$6,273	\$7,595
F3XA	M10	A	11/20/2013	68	13942590642	9/1/2013	9/30/2013	\$46,682	\$58,873	\$6,273	\$7,595
F3XX	M11	N	11/20/2013	52	13942590710	10/1/2013	10/31/2013	\$35,356	\$32,672	\$8,957	\$20,111
F3XX	M12	N	12/20/2013	54	13944242862	11/1/2013	11/30/2013	\$33,217	\$41,899	\$275	\$32,770
F3XA	M12	A	1/26/2014	54	14940089153	11/1/2013	11/30/2013	\$33,217	\$41,899	\$275	\$32,770
F3XX	YE	A	1/31/2014	59	14940252910	12/1/2013	12/31/2013	\$36,799	\$33,528	\$3,546	\$34,044
F3XA	YE	A	2/17/2014	59	14940354671	12/1/2013	12/31/2013	\$129,789	\$33,528	\$98,546	\$34,044
F3XX	M2	N	2/20/2014	61	14940531884	1/1/2014	1/31/2014	\$66,784	\$51,155	\$112,155	\$27,059
F3XX	M3	N	3/20/2014	43	14980549626	2/1/2014	2/28/2014	\$42,463	\$43,810	\$110,808	\$31,559
F3XX	M4	N	4/18/2014	44	14960852710	3/1/2014	3/31/2014	\$110,808	\$28,759	\$99,619	\$31,059
F3XX	M5	N	5/19/2014	52	14961160951	4/1/2014	4/30/2014	\$34,354	\$34,354	\$103,809	\$25,261
F3XX	M6	N	6/19/2014	46	14961287126	5/1/2014	5/31/2014	\$81,033	\$46,801	\$138,041	\$32,628
F3XX	M7	N	7/19/2014	98	14941881262	6/1/2014	6/30/2014	\$88,370	\$113,484	\$112,927	\$29,224
F3XX	M8	N	8/20/2014	108	14950062701	7/1/2014	7/31/2014	\$107,490	\$127,435	\$92,982	\$25,071
F3XX	M9	N	9/19/2014	127	14970874328	8/1/2014	8/31/2014	\$160,946	\$200,424	\$53,504	\$34,980
F3XX	M10	N	10/20/2014	259	14951772937	9/1/2014	9/30/2014	\$346,467	\$314,427	\$85,584	\$56,584
F3XX	12G	A	10/23/2014	142	14952534388	10/1/2014	10/15/2014	\$359,540	\$113,983	\$60,584	\$60,584
F3XA	12G	A	12/3/2014	142	14952716920	10/1/2014	10/15/2014	\$359,540	\$113,983	\$60,584	\$60,584
F3XX	30G	A	12/4/2014	290	14952761474	10/16/2014	11/24/2014	\$113,893	\$961,763	\$25,435	\$38,336
F3XA	30G	A	4/6/2015	292	15970328744	10/16/2014	11/24/2014	\$873,214	\$961,763	\$25,435	\$38,336
F3XX	YE	A	1/29/2015	88	15970140473	11/25/2014	12/31/2014	\$873,214	\$961,763	\$25,435	\$38,336
F3XA	YE	A	4/6/2015	88	15970328036	11/25/2014	12/31/2014	\$25,435	\$48,269	\$6,542	\$40,946
F3XA	YE	A	2/4/2016	6	14940329344	11/25/2014	12/31/2014	\$29,377	\$48,269	\$6,542	\$40,946
F3XA	YE	A	4/14/2016	6	14960681130	-	-	-	-	-	-
F3XA	YE	A	12/4/2013	6	13942863577	-	-	-	-	-	-
F3XA	YE	A	3/3/2014	6	14960485669	-	-	-	-	-	-
F3XA	YE	A	5/3/2013	6	13962162726	-	-	-	-	-	-
F3XA	YE	A	5/8/2013	6	13962165547	-	-	-	-	-	-
F3XA	YE	A	7/31/2014	8	14952169360	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A	12/16/2013	6	13964887105	-	-	-	-	-	-
F3XA	YE	A									

Democratic Party of New Mexico (C00161810)
2016 September Monthly Report/Amended 2016 September Monthly Report

Overview of Additional Disbursements

Report Line	2016 September Monthly Report (Image 20160920903104 1105)	Amended 2016 September Monthly Report, Received 12/6/2016 (Image 201612069037665592)	Variance Amount
Line 22: Transfers to Affiliated/Other Party Committees	\$0.00	\$600,000.00	\$600,000.00
		Total	\$600,000.00