

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: January 25, 2006

ANALYST: Christopher Morse

I. COMMITTEE: Republican Issues Committee (C00382671)
Chris Gersten, Treasurer, as of 4/21/05
Linda Chavez, Treasurer, 8/19/03-4/20/05
P.O. Box 650700
Sterling, VA 20165

II. RELEVANT STATUTE: 2 U.S.C. §434(b)(2)
2 U.S.C. §434(b)(4)
11 C.F.R. §104.3(a)
11 C.F.R. §104.3(b)

III. BACKGROUND:

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

On April 20, 2005, Republican Issues Committee ("the Committee") filed an Amended 2004 12 Day Pre-General Report disclosing \$93,000.31 in additional receipts and \$106,719.42 in additional disbursements, an Amended 2004 30 Day Post-General Report disclosing \$675,813.65 in additional receipts and \$647,547.67 in additional disbursements and an Amended 2004 Year End Report disclosing \$325,616.45 in additional receipts (Attachment 2).

2004 12 Day Pre-General Report

On October 21, 2004, the Committee filed its 2004 12 Day Pre-General Report covering the period from October 1, 2004 to October 13, 2004. This original report disclosed \$5,746.00 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals/Persons Other than Political Committees) and \$0.00 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals/Persons Other than Political Committees), Line 11(c) (Contributions from Other Political Committees) and Line 15 (Offsets to Operating Expenditures). In addition, the Committee disclosed \$0.00 in

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disbursements on Line 21(b) (Other Federal Operating Expenditures) and Line 23 (Contributions to Federal Candidates/Committees) of the Detailed Summary Page (Images 24962679830 and 24962679831).

On April 20, 2005, the Committee filed an Amended 2004 12 Day Pre-General Report which disclosed \$5,676.00 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals/Persons Other than Political Committees), \$92,763.21 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals/Persons Other than Political Committees), \$100.00 in receipts on Line 11(c) (Contributions from Other Political Committees) and \$207.10 in receipts on Line 15 (Offsets to Operating Expenditures). In addition, the Committee disclosed \$96,719.42 in disbursements on Line 21(b) (Other Federal Operating Expenditures) and \$10,000.00 in disbursements on Line 23 (Contributions to Federal Candidates/Committees) of the Detailed Summary Page (Images 25990526750 and 25990526751).

On April 29, 2005, a Request for Additional Information ("RFAI") was sent to the Committee. The RFAI asked for clarification regarding the \$92,763.21 in additional receipts and \$106,719.42 in additional disbursements that were not disclosed on the Committee's original 2004 12 Day Pre-General Report (Image 25038803473).

2004 30 Day Post-General Report

On December 2, 2004, the Committee filed its 2004 30 Day Post-General Report covering the period from October 14, 2004 to November 22, 2004. This original report disclosed \$0.00 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals/Persons Other than Political Committees), \$2,413.00 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals/Persons Other than Political Committees) and \$0.00 in receipts on Line 17 (Other Federal Receipts). In addition, the Committee disclosed \$2,932.15 in disbursements on Line 21(b) (Other Federal Operating Expenditures) of the Detailed Summary Page (Images 24981616126 and 24981616127).

On April 20, 2005, the Committee filed an Amended 2004 30 Day Post-General Report which disclosed \$22,512.00 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals/Persons Other than Political Committees), \$655,661.01 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals/Persons Other than Political Committees), \$53.64 in receipts on Line 17 (Other Federal Receipts) and \$650,479.82 in disbursements on Line 21(b) (Other Federal Operating Expenditures) of the Detailed Summary Page (Images 25990526778 and 25990526779).

On April 29, 2005, an RFAI was sent to the Committee. The RFAI asked for clarification regarding the \$675,400.01 in additional receipts and \$647,547.67 in additional disbursements that were not disclosed on the Committee's original 2004 30 Day Post-General Report (Image 25038803479).

2004 Year End Report

On January 31, 2005, the Committee filed its 2004 Year End Report covering the period from November 23, 2004 to December 31, 2004. This original report disclosed \$0.00 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals/Persons Other

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than Political Committees), \$9,915.00 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals/Persons Other than Political Committees) and \$0.00 in receipts on Line 17 (Other Federal Receipts) of the Detailed Summary Page (Image 25980422539).

On April 20, 2005 the Committee filed an Amended 2004 Year End Report which disclosed \$7,865.00 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals/Persons Other than Political Committees), \$327,601.26 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals/Persons Other than Political Committees) and \$65.19 in receipts on Line 17 (Other Federal Receipts) of the Detailed Summary Page (Image 25990526871).

On April 29, 2005, an RFAI was sent to the Committee. The RFAI asked for clarification regarding the \$325,551.26 in additional receipts that were not disclosed on the Committee's original 2004 Year End Report (Image 25038803482).

On June 3, 2005, a Reports Analysis Division ("RAD") analyst called the Committee regarding the RFAs referencing the Amended 2004 12 Day Pre-General, 2004 30 Day Post-General and 2004 Year End reports. The RAD analyst notified Robin Sexton, a consultant working for the Committee, that because of the magnitude of the increased financial activity within each report, the entire matter would be referred to the Office of General Counsel. Ms. Sexton stated that she had just uploaded a miscellaneous electronic submission to clarify the circumstances that caused the increase in activity on these reports and thanked the Analyst for the call (Attachment 3).

On June 3, 2005, the Committee filed a miscellaneous electronic submission regarding the additional receipts and disbursements disclosed on the Amended 2004 12 Day Pre-General, 2004 30 Day Post-General and 2004 Year End reports which stated the following "RIC uses several vendors to fundraise for their PAC. Each company provides the information regarding receipts and disbursements differently. One vendor provides all receipts and all disbursements, while the other vendor provides all disbursements, but only those receipts that reach the reporting threshold of greater than \$200 in the aggregate. Our compliance outsourcing vendor was given the files and understood that both organizations provided all receipts and disbursements differently. They, therefore, entered that data into their reporting software to allow them to generate the report for filing. They entered both sets of data the same way, which means that all the unitemized receipts from the one vendor (which is the bulk of what we get) were not included." In addition, the Committee noted that the problem was further complicated by a change in the staff, which resulted in the failure to correct the errors, but that systems will be put in place to prevent these errors from occurring in the future (Image 25990986775).

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

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REPUBLICAN ISSUES CAMPAIGN
Chavez, Linda
FILING FREQUENCY: QUARTERLY

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VA 20165

ID #C00382671

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
1			A	2/10/2003	4	23990363778						
1			A	8/19/2003	4	23991741103						
1			A	11/06/2003	4	23992243793						
1			M	11/07/2003	1	23992250384						
MS			T	3/17/2003	2	23990532666						
MS			T	11/06/2003	1	23992243843						
MS			T	3/15/2004	2	24990757875						
MS			T	3/22/2004	5	24038342533						
MS			T	4/07/2004	1	24990932385						
MS			T	8/19/2004	1	24962140906						
RQ	YE	2		2/18/2004	3	24038322390	7/01/2003 12/31/2003					
RQ	Q2	2		7/28/2004	3	24038483595	4/01/2004 6/30/2004					
RQ	Q3	2		12/10/2004	3	24038662538	7/01/2004 9/30/2004					
RQ	12G	2		4/29/2005	3	25038803473	10/01/2004 10/13/2004					
RQ	30G	2		1/05/2005	3	25038682477	10/14/2004 11/22/2004					
RQ	30G	2		4/29/2005	3	25038803479	10/14/2004 11/22/2004					
RQ	YE	2		2/25/2005	3	25038742457	11/23/2004 12/31/2004					
RQ	YE	2		4/29/2005	3	25038803482	11/23/2004 12/31/2004					
3	MY	N	P	7/28/2003	25	23991566560	1/01/2003 6/30/2003	1925	1602567	46475	1558016	0
3	MY	A	P	8/15/2003	29	23991723810	1/01/2003 6/30/2003	1925	1513741	1467115	48550	0
3	YE	N	P	1/29/2004	56	24990241664	7/01/2003 12/31/2003	48221	1786593	1772791	62022	0
3	YE	A	P	4/07/2004	63	24990932322	7/01/2003 12/31/2003	48550	1786593	1772791	62352	0
3	Q1	N	P	4/07/2004	49	24990932386	1/01/2004 3/31/2004	62352	1307013	1274441	94923	0
3	Q1	A	P	7/12/2004	49	24961758443	1/01/2004 3/31/2004	62352	1307013	1274506	94858	0
3	Q2	N	P	7/12/2004	49	24971314025	4/01/2004 6/30/2004	94858	1420944	1432756	83046	0
3	Q2	A	P	7/14/2004	56	24961801861	4/01/2004 6/30/2004	94858	1421460	1433184	83134	0

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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	Q3	N	P	10/15/2004	115	24962507508	7/01/2004 9/30/2004	83134	1695126	1683702	94558	0
3	Q3	A	P	1/24/2005	117	25980322805	7/01/2004 9/30/2004	83134	1695483	1678702	99915	0
3	12G	N	P	10/21/2004	7	24962679828	10/01/2004 10/13/2004	94558	5746	0	100304	0
3	12G	A	P	4/20/2005	28	25990526748	10/01/2004 10/13/2004	99779	98746	106719	91806	0
3	30G	N	P	12/02/2004	11	24981616124	10/14/2004 11/22/2004	100304	- 7951	8932	99324	0
3	30G	A	P	4/20/2005	93	25990526776	10/14/2004 11/22/2004	91806	683765	656479	119092	0
3	YE	N	P	1/31/2005	11	25980422537	11/23/2004 12/31/2004	99324	9915	324630	215391	0
3	YE	A	P	3/11/2005	6	25038751945	11/23/2004 12/31/2004	-	-	-	-	-
3	YE	A	P	4/20/2005	49	25990526869	11/23/2004 12/31/2004	119092	335531	332770	121853	0
TOTAL									8842332	8722266		

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REPUBLICAN ISSUES COMMITTEE

Chris Gersten

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ID #C00382671

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
1			A	4/21/2005	8	25990543248						
MS			T	1/31/2005	2	25038710608						
MS			T	3/28/2005	1	25990330366						
MS			T	4/20/2005	1	25990526725						
MS			T	6/03/2005	1	25990986775						
MS			T	11/18/2005	1	25971528136						
RQ	MY	2		10/07/2005	4	25038903121	1/01/2005 6/30/2005					
3	MY	N	P	7/31/2005	95	25970866556	1/01/2005 6/30/2005	121853	1547483	1532777	136558	0
3	MY	A	P	11/18/2005	96	25971528040	1/01/2005 6/30/2005	121853	1547561	1532777	136637	0
TOTAL									1547561	1532777		

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Republican Issues Committee (C00382671)**2004 12 Day Pre-General Report/Amended 2004 12 Day Pre-General Report****Overview of Additional Receipts and Disbursements**

Line	Original 2004 12 Day Pre-General Report (Image 24962679828)	Amended 2004 12 Day Pre-General Report (Image 25990526748)	Variance Amount
Receipts			
11(a)(i)	\$5,746.00	\$5,676.00	\$70.00* ¹
11(a)(ii)	\$0.00	\$92,763.21	\$92,763.21
11(c)	\$0.00	\$100.00	\$100.00 ¹
15	\$0.00	\$207.10	\$207.10 ¹
Disbursements			
21(b)	\$0.00	\$96,719.42	\$96,719.42
23	\$0.00	\$10,000.00	\$10,000.00

*Decrease in activity.

2004 30 Day Post-General Report/Amended 2004 30 Day Post-General Report**Overview of Additional Receipts and Disbursements**

Line	Original 2004 30 Day Post- General Report (Image 24981616124)	Amended 2004 30 Day Post-General Report (Image 25990526776)	Variance Amount
Receipts			
11(a)(i)	\$0.00	\$22,512.00	\$22,512.00
11(a)(ii)	\$2,413.00	\$655,661.01	\$653,248.01
17	\$0.00	\$53.64	\$53.64 ¹
Disbursements			
21(b)	\$2,932.15	\$650,479.82	\$647,547.67

2004 Year End Report/Amended 2004 Year End Report**Overview of Additional Receipts**

Line	Original 2004 Year End Report (Image 25980422537)	Amended 2004 Year End Report (Image 25990526869)	Variance Amount
11(a)(i)	\$0.00	\$7,865.00	\$7,865.00
11(a)(ii)	\$9,915.00	\$327,601.26	\$317,686.26
17	\$0.00	\$65.19	\$65.19 ¹

¹ The RFAI failed to note this receipt amount.

Committee ID: C00382671

Committee Name: REPUBLICAN ISSUES COMMITTEE

Committee Designation: UNAUTHORIZED

Filing Frequency: QUARTERLY FILER

Candidate ID: Not Available

Candidate Name: Not Available

Special Interest Group: Not Available

Multi-Candidate Status/Date: Yes

Date Effective: 10/22/2003

Committee Type: QUALIFIED NON-PARTY(SEE 2 USC SECT.441(A)(4))

Treasurer Name: CHRIS GERSTEN

Committee Address: PO BOX 650700
STERLING, VA 20165

Analyst Assigned: Christopher Morse

Contact	Communication Date	Analyst Name	Date of Entry	Type
Robin Sexton	6/3/2005	Christopher Morse	6/3/2005	Phone Call
Summary	I contacted Ms. Sexton regarding the RFAs I sent concerning the increase in receipts and disbursements on the amended 2004 12 Day Pre-General, 30 Day Post-General and Year End Reports. I informed her that given the amounts involved this was an issue that would be referred to the Office of the General Counsel. Ms. Sexton said she had just uploaded an MST to further clarify the circumstances surrounding the increase in activity. Ms. Sexton thanked me for this notice and ended the call.			
Comments	I reviewed the MST and it was deemed to be an inadequate response.			