

REPORTS ANALYSIS REFERRAL

DATE: January 11, 2005

ANALYST: William Wiquist

I. COMMITTEE: Democratic Party of Virginia – Federal
Campaign Committee (C00155952)
Abbi G. Easter, Treasurer
1108 E. Main Street 2nd Floor
Richmond, VA 23219

II. RELEVANT STATUTE: 2 U.S.C. §434(b)(2),
2 U.S.C. §434(b)(4),
11 C.F.R. §104.3(a)(2),
11 C.F.R. §104.3(b)(1)(ii)
11 C.F.R. §104.17(b)

III. BACKGROUND:

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

On May 14, 2004, the Democratic Party of Virginia (“the Committee”) filed an Amended 2003 Mid-Year Report disclosing additional receipts and disbursements totaling \$59,672.00 and \$111,043.29, respectively.

On July 31, 2003, the Committee filed its 2003 Mid-Year Report covering the period of January 1, 2003 through June 30, 2003. This original report disclosed \$34,021.80 on Line 11(a)(ii) (unitemized contributions from individuals/persons other than political committees). No receipts were disclosed for the following line items: Line 11(c) (contributions from other political committees), Line 12 (transfers from affiliated/other party committees), Line 15 (offsets to operating expenditures), Line 17 (other federal receipts), and Line 18(a) (transfers from the Committee’s non-federal account for allocated activity). No disbursements were disclosed on the following line items: Line 21(a)(i) (the federal share of allocated activity) Line 21(a)(ii) (the non-federal share of allocated activity) and Line 22 (transfers to affiliated or other party committees) (Image 23991625121).

On May 14, 2004, the Committee filed an Amended 2003 Mid-Year Report which disclosed \$34,268.82 on Line 11(a)(ii) (unitemized contributions from individuals/persons other than political committees), \$1,984.11 on Line

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11(c) (contributions from other political committees) \$5,698.90 on Line 12 (transfers from affiliated/other party committees), \$15.91 on Line 15 (offsets to operating expenditures), \$15,727.68 on Line 17 (other federal receipts), \$62,035.72 on Line 18(a) (transfers from the Committee's non-federal account for allocated activity), \$4,539.66 on Line 21(a)(i) (the federal share of allocated activity), \$25,724.63 on Line 21(a)(ii) (the non-federal share of allocated activity) and \$214,400.00 on Line 22 (transfers to affiliated or other party committees) (Image 24961316975). (Attachment 2).

On August 4, 2004, a Request for Additional Information ("RFAI") was sent to the Committee. The RFAI asked for clarification regarding the \$59,672 in additional receipts and the \$111,043 in additional disbursements that were not disclosed on the Committee's original report (Image 24038491095).

On September 3, 2004, the Committee filed a miscellaneous text document in response to the RFAI which stated that the amended report submitted by the Committee on May 14, 2004 "discloses additional receipts and disbursements that were not reflected on the original report due to miscommunication between our accountants and the Party. The general ledger containing contributions and disbursements for 1/1/03-6/30/03 was only partly complete when submitted to the DPVA by the independent accountant. Both the DPVA and the accountants were unaware of this oversight at the time of submission of the original report. When the Democratic Party of Virginia became aware of these discrepancies, immediate steps were taken to include the additional information and amend the original report" (Image 24962333406).

On September 13, 2004, the Reports Analysis Division ("RAD") analyst called the Committee and left a voice mail message concerning the increase in receipts and disbursements. The analyst informed the Committee that the issue of increased receipts and disbursements on their Amended 2003 Mid-Year Report was referable to the Office of General Counsel and that the Committee should provide any additional information regarding this matter (Attachment 3).

On September 15, 2004, Neil Reiff, Counsel for the Committee, returned the RAD analyst's call on behalf of the Committee. He asked whether there was anything else that the Committee had to submit to the Commission. The analyst advised Mr. Reiff that the Committee should provide any further clarifying information regarding the increased activity for the public record (Attachment 4).

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

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DEMOCRATIC PARTY OF VIRGINIA
ABBI G EASTER
FILING FREQUENCY MONTHLY

1108 East Main Street 2nd Floor Richmond

ARTY QUALIFIED
VA 23219

ID #C00155952

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
1		A		10/28/2004	6	24962719503						
MS		O		3/10/2004	2	24038334733						
MS		T		4/30/2004	1	24991209468						
MS		T		5/07/2004	1	24961236377						
MS		T		9/03/2004	1	24962333406						
MS		T		9/10/2004	1	24971438655						
MS		T		9/24/2004	1	24971587863						
MS		T		9/24/2004	1	24971587954						
MS		T		10/01/2004	1	24962372693						
MS		T		10/01/2004	1	24962372789						
MS		T		10/12/2004	5	24038533724						
MS		N		10/20/2004	2	24038581195						
MS		2		10/28/2004	1	24962719851						
MS		T		11/24/2004	1	24962939264						
MS		T		11/26/2004	1	24971935162						
MS		T		11/26/2004	1	24971935163						
RQ	MY	2		3/31/2004	6	24038350015	1/01/2003	6/30/2003				
RQ	MY	2		8/04/2004	3	24038491095	1/01/2003	6/30/2003				
RQ	YE	2		4/07/2004	8	24038352450	7/01/2003	12/31/2003				
RQ	M2	2		4/14/2004	4	24038363336	1/01/2004	1/31/2004				
RQ	M2	2		8/11/2004	8	24038494228	1/01/2004	1/31/2004				
RQ	M2	2		8/25/2004	3	24038504141	1/01/2004	1/31/2004				
RQ	M3	2		8/25/2004	5	24038504144	2/01/2004	2/29/2004				
RQ	M4	2		9/01/2004	4	24038511020	3/01/2004	3/31/2004				
RQ	M5	2		9/01/2004	7	24038511013	4/01/2004	4/30/2004				
RQ	M7	2		10/27/2004	4	24038603439	6/01/2004	6/30/2004				
RQ	M7	2		12/23/2004	2	24038673579	6/01/2004	6/30/2004				
RQ	M8	2		10/27/2004	4	24038603435	7/01/2004	7/31/2004				
RQ	M8	2		12/23/2004	3	24038673581	7/01/2004	7/31/2004				

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RQ	M9	2		10/27/2004	4	24038603431	8/01/2004 8/31/2004					
RQ	M10	2		12/08/2004	5	24038661699	9/01/2004 9/30/2004					
3	MY	N	P	7/31/2003	73	23991625119	1/01/2003 6/30/2003	22192	183782	147806	58169	0
3	MY	A	P	4/30/2004	84	24991209384	1/01/2003 6/30/2003	22192	200859	258876	35824-	0
3	MY	A	P	5/07/2004	126	24961236067	1/01/2003 6/30/2003	22192	243454	258849	6798	0
3	MY	A	P	5/14/2004	126	24961316973	1/01/2003 6/30/2003	22192	243454	258849	6798	0
3	YE	N	P	1/30/2004	49	24990365890	7/01/2003 12/31/2003	58169	290192	226682	121680	0
3	YE	A	P	5/07/2004	146	24961236231	7/01/2003 12/31/2003	6798	306932	226682	87048	0
3	YE	A	P	6/29/2004	162	24971297022	7/01/2003 12/31/2003	6798	285577	225704	66670	0
3	M2	N	P	2/19/2004	43	24990535288	1/01/2004 1/31/2004	121680	53249	16542	158387	0
3	M2	A	P	3/04/2004	44	24990721633	1/01/2004 1/31/2004	121680	53249	16681	158248	0
3	M2	A	P	5/14/2004	76	24961316870	1/01/2004 1/31/2004	54382	270044	16681	307745	0
3	M2	A	P	9/10/2004	45	24981273601	1/01/2004 1/31/2004	66670	53249	16935	102984	0
3	M2	A	P	10/15/2004	46	24962470559	1/01/2004 1/31/2004	66670	55912	16935	105648	0
3	M3	N	P	3/19/2004	79	24990831769	2/01/2004 2/29/2004	158248	96811	96646	158412	0
3	M3	A	P	9/24/2004	84	24971587956	2/01/2004 2/29/2004	102984	85971	101137	87818	0
3	M3	A	P	10/15/2004	85	24971676901	2/01/2004 2/29/2004	105648	85971	101137	90482	0
3	M4	N	P	4/17/2004	30	24991082338	3/01/2004 3/31/2004	158412	12908	85961	85359	0
3	M4	A	P	10/01/2004	36	24962372695	3/01/2004 3/31/2004	87818	18908	87285	19441	0
3	M4	A	P	10/15/2004	36	24971676990	3/01/2004 3/31/2004	90482	18908	87285	22104	0
3	M5	N	P	5/20/2004	48	24961434205	4/01/2004 4/30/2004	22104	90133	53665	58572	0
3	M5	A	P	10/01/2004	39	24962372995	4/01/2004 4/30/2004	19441	74846	53665	40621	0
3	M5	A	P	10/15/2004	40	24962474801	4/01/2004 4/30/2004	22104	74975	53665	43414	0
3	M6	N	P	6/18/2004	26	24961657002	5/01/2004 5/31/2004	43414	80350	43480	80284	0
3	M6	A	P	10/15/2004	27	24971677619	5/01/2004 5/31/2004	43414	80350	43480	80284	0
3	M7	N	P	7/20/2004	30	24961934443	6/01/2004 6/30/2004	80284	52402	85984	46701	0
3	M7	A	P	10/15/2004	31	24962476627	6/01/2004 6/30/2004	80284	52452	85945	46791	0
3	M7	A	P	11/24/2004	34	24962939339	6/01/2004 6/30/2004	80284	52452	85945	46791	0
3	M8	N	P	8/20/2004	32	24962206357	7/01/2004 7/31/2004	46701	95147	103063	38785	0

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3	M8	A	P	10/15/2004	34	24962506365	7/01/2004	7/31/2004	46791	95147	103063	38875	0
3	M8	A	P	11/26/2004	44	24962944041	7/01/2004	7/31/2004	46791	95147	102763	39175	0
3	M9	N	P	9/20/2004	60	24981281560	8/01/2004	8/31/2004	38785	295208	146426	187567	0
3	M9	A	P	10/15/2004	60	24962506589	8/01/2004	8/31/2004	38875	295207	146426	187655	0
3	M9	A	P	11/26/2004	66	24962944244	8/01/2004	8/31/2004	39175	295207	146436	187945	0
3	M10	N	P	10/20/2004	136	24962615041	9/01/2004	9/30/2004	187655	262365	273478	176543	0
3	M10	A	P	1/07/2005	151	25980051629	9/01/2004	9/30/2004	187945	262365	273497	176813	0
3	12G	N	P	10/21/2004	57	24991296208	10/01/2004	10/13/2004	176543	116513	57164	235892	0
3	30G	N	P	12/02/2004	894	24981601697	10/14/2004	11/22/2004	239569	467677	554262	152984	0
TOTAL										2134508	2007122		

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Democratic Party of Virginia (C00155952)
 2003 Mid-Year Report / Amended 2003 Mid-Year Report
 Receipt and Disbursement Overview

Line	Original 2003 Mid-Year Report (Image 23991625121)	Amended 2003 Mid- Year Report (Image 24961316975)	Receipt and Disbursement Difference
11(a)(i)*	\$82,862.04	\$63,723.60	\$19,138.44
11(a)(ii)	\$34,021.80	\$34,268.82	\$247.02
11(b)*	\$66,898.90	\$0.00	\$66,898.90
11(c)	\$0.00	\$1,984.11	\$1,984.11
12	\$0.00	\$65,698.90	\$65,698.90
15	\$0.00	\$15.91	\$15.91
17	\$0.00	\$15,727.68	\$15,727.68
18(a)	\$0.00	\$62,035.72	\$62,035.72
21(a)(i)	\$0.00	\$4,539.66	\$4,539.66
21(a)(ii)	\$0.00	\$25,724.63	\$25,724.63
21(b)*	\$147,506.00	\$14,185.00	\$133,321.00
22	0.00	\$214,400.00	\$214,400.00
28(a)*	\$300.00	\$0.00	\$300.00

***Decrease in Activity**

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