

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: May 24, 2006

ANALYST: Jennifer L. Jones

I. COMMITTEE: Massachusetts Republican State Congressional
Committee
(C00042622)
Brent Anderson, Treasurer
85 Merrimac Street, Suite 400, Room 526
Boston, MA 02114

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

III. BACKGROUND:

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

The Massachusetts Republican State Congressional Committee ("the Committee") filed an Amended 2003 June Monthly Report, on December 20, 2005, which disclosed additional disbursements totaling \$56,286.90 (Attachment 2).

On July 1, 2003, the Committee filed its original 2003 June Monthly Report covering the period from May 1, 2003 through May 31, 2003. This report disclosed \$50,947.79 on Line 21(b) (Other Federal Operating Expenditures) and \$0.00 on Line 30(b) (Federal Election Activity Paid Entirely with Federal Funds) of the Detailed Summary Page (Image 23991204101).

On August 15, 2003, the Committee filed an Amended 2003 June Monthly Report. This report disclosed \$63,618.62 on Line 21(b) (Other Federal Operating Expenditures) and \$0.00 on Line 30(b) (Federal Election Activity Paid Entirely with Federal Funds) of the Detailed Summary Page (Image 23991717777).

On February 11, 2004 a Request for Additional Information ("RFAI") was sent to the Committee. The RFAI, among other discrepancies, sought clarification regarding the additional disbursements, totaling \$12,671.00, which was not disclosed on the Committee's original 2003 June Monthly Report (Image 24038320133).

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On March 20, 2004, the Committee filed a miscellaneous electronic submission which stated, "Amendment discloses an additional disbursements totaling \$12,671. This was due to computer data entry errors, and was the purpose for amending the initial report." (Image 24990848338)

Also on March 20, 2004, the Committee filed an Amended 2003 June Monthly Report. This report disclosed \$47,507.79 on Line 21(b) (Other Federal Operating Expenditures) and \$16,300.73 on Line 30(b) (Federal Election Activity Paid Entirely with Federal Funds) of the Detailed Summary Page (Image 24990848190).

On April 20, 2004, the Committee filed an Amended 2003 June Monthly Report. This report disclosed no change in the amount of disbursements previously disclosed by the Committee on their Amended June Monthly Report, received 3/20/04 (Image 24991154579).

On December 19, 2005, Jinara Reyes, Deputy Finance Director of the Committee, called and informed the Reports Analysis Division ("RAD") analyst that the Committee would be amending several reports beginning with the calendar year 2003 to disclose additional disbursements omitted from the original reports (Attachment 3).

On December 20, 2005, the Committee filed an Amended 2003 June Monthly Report. This report disclosed \$79,092.46 on Line 21(b) (Other Federal Operating Expenditures) and \$28,142.23 on Line 30(b) (Federal Election Activity Paid Entirely with Federal Funds) of the Detailed Summary Page. A memo text attached to the report stated, "Amended Report - report is being amended to reflect additional electronic fund transfer disbursements that were made but not reflected on original report(s). An internal audit has uncovered the oversight and this report is being amended to correct the oversight." (Image 25971661268 and 25971661307)

On January 25, 2006, an RFAI was sent to the Committee. The RFAI asked for clarification regarding the additional disbursements, totaling \$56,286.90, that had not been disclosed on the Committee's original 2003 June Monthly Report (Image 26038960149).

On February 24, 2006 at 19:01, the Committee filed a miscellaneous electronic submission which stated, "Regarding the additional \$56,286.90 of disbursements not reflected on original report- we had changed accountants during the month, and a batch of checks/disbursements were overlooked and never recorded into our FEC filing database. There were also a few disbursements that were electronic transfers directly to our checking account that were overlooked. As indicated in the report notes submitted with the report, an internal review [conducted] in the fall of 2004 caught the oversight and all reports from January 2003 - December 2005 were amended to reflect missing electronic transfers and a very limited number of check disbursements that were overlooked." (Image 26970062095)

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On March 10, 2006, the RAD analyst called the Committee's Deputy Finance Director regarding the RFAI sent referencing the Amended 2003 June Monthly Report, received December 20, 2005. The Analyst informed Ms. Reyes that since all financial activity was not disclosed in a timely manner for their 2003 June Monthly Report, the matter would be referred to the Office of General Counsel (OGC). Ms. Reyes stated this was "okay" because the Committee had anticipated they would be referred to OGC (Attachment 3).

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

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