



Federal Election Commission  
Washington, DC 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2007 NOV 13 P 3:21

**MEMORANDUM**

November 13, 2007

**SENSITIVE**

TO: The Commission

THROUGH: Patrina M. Clark  
Staff Director *pmc*

FROM: John D. Gibson  
Chief Compliance Officer *JDG*

Deborah Ruth Kant  
Director, ADR Office *DRK*

SUBJECT: ADR 429 Nevada Republican State Central Committee and Basil Raffa,  
Treasurer, Recommendation to Assign<sup>1</sup>

**ADR Case:** ADR 429

**Source No.** RR 07L-41

**Respondents:**  
Nevada Republican State Central  
Committee  
Basil Raffa, Treasurer

**Respondents' Rep.:**  
Basil Raffa

**Referral:** OGC

**Committee Name:** Nevada Republican State  
Central Committee

**Date Referral Filed:** 10/19/07

**Committee Type:** Unauthorized

**Date Forwarded to ADRO:** 11/01/07

**Election Cycle:** 2006

**EPS Rating:** 28

**Tier Level:** 3

<sup>1</sup> The Office of General Counsel reviewed the ADR Memorandum, and concurs in the description of the case.

28190274061

**Summary and Analysis of Case:** Treasurers of political committees are required to report all financial activity, including all disbursements. 2 U.S.C. §§ 434(a), (b)(4), 11 C.F.R. § 104.3(b)(1). In this case, Respondents (or “the Committee”) failed to disclose \$51,429.63 on its 2006 September Monthly Report (a 43.3% increase in activity) and \$121,918.69 on its 2006 October Monthly Report (a 272% increase in activity). The Committee filed the amended September Monthly report with the additional activity on January 9, 2007, and the amended October Monthly on February 24, 2007. In response, to requests for further information on both amended reports, the Committee submitted identical electronic submissions. The Committee stated that the increased activity resulted from inadvertent data entry between its state and federal accounts. It also stated that it had implemented a system to cross-check all entries of disbursements and contributions.

**RECOMMENDATION:**

1. Assign ADR 429/RR 07L-41 to the ADR Office.

28190274062