

DATE: January 22, 2008

ANALYST: Jodi Winship

REPORTS ANALYSIS AUDIT REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

- I. **COMMITTEE:** 21st Century Democrats
C00230342
Bill Combs, Treasurer (4/20/06 – present)
Michael Lux, Treasurer (3/18/03 – 4/19/06)
1731 Connecticut Ave NW, 2nd Floor
Washington, DC 20009
- TYPE OF COMMITTEE** Nonconnected
- II. **REGISTRATION:** July 28, 1988
- III. **SUMMARY OF RFAI RESPONSES:** The Committee responded inadequately or provided a late adequate response to twenty-three (23) of forty-nine (49) RFAIs sent in the 2005-2006 election cycle.

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VIOLATION DESCRIPTION	REPORT(S)	DETAILS OF VIOLATION
Excessive, Prohibited and Other Impermissible Contributions or Transfers	Amended 2006 12G, received 11/29/06	Schedule A of the Committee's report disclosed the receipt of an excessive contribution totaling \$5,000. This contribution was received from one (1) multicandidate committee. While the Committee issued a refund, the refund was issued outside of the permissible period of sixty (60) days from the date of receipt of the contribution.
Mathematical Discrepancies	2005 M2	The Committee's beginning cash balance, \$143,274.17, was less than the ending cash balance of the Committee's previous report, \$158,400.90, a discrepancy of \$15,126.73.
Mathematical Discrepancies	Amended 2005 M4, received 4/21/05	The Committee's report contained mathematical discrepancies totaling \$4,510.
Mathematical Discrepancies	2005 M5	The Committee's report contained mathematical discrepancies totaling \$1,607.50.
Mathematical Discrepancies	2005 M6	The Committee's report contained mathematical discrepancies totaling \$13,238.86.
Mathematical Discrepancies	2005 M7 and Amended 2005 M7, received 5/12/06	The Committee's report contained mathematical discrepancies totaling \$97,121.30.
Mathematical Discrepancies	2005 M11	<p>The Committee's report contained mathematical discrepancies totaling \$5,859.34, as detailed below:</p> <ul style="list-style-type: none"> • The Committee's beginning cash balance, \$279,207.85, was less than the ending cash balance of the Committee's previous report, \$282,015.24, a discrepancy of \$2,807.39; • The Committee's report contained Column B discrepancies totaling \$244.56; • Line 8, Column A, \$284,296.59, of the Summary Page did not equal Line 8, Column B, \$287,103.98, of the Summary Page, a discrepancy of \$2,807.39.
Mathematical Discrepancies	2005 M12	<p>The Committee's report contained mathematical discrepancies totaling \$124,644.19, as detailed below:</p> <ul style="list-style-type: none"> • The Committee's beginning cash balance, \$287,103.98, was greater than the ending cash balance of the Committee's previous report, \$284,296.59, a discrepancy of \$2,807.39; • The Committee's report contained Column B discrepancies totaling \$121,407.28;

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		<ul style="list-style-type: none"> Line 8, Column A of the Summary Page, \$300,317.50, did not equal Line 8, Column B of the Summary Page, \$299,887.98, a discrepancy of \$429.52.
Mathematical Discrepancies	2005 YE and Amended 2005 YE, received 4/10/06	<p>The Committee's report contained mathematical discrepancies totaling \$124,644.19, as detailed below:</p> <ul style="list-style-type: none"> The Committee's beginning cash balance, \$308,073.45, was greater than the ending cash balance of the Committee's previous report, \$300,317.50, a discrepancy of \$7,755.95; The Committee's report contained Column B discrepancies totaling \$66,444.40; Line 8, Column A of the Summary Page, \$164,982.94, did not equal Line 8, Column B of the Summary Page, \$159,090.63, a discrepancy of \$5,892.31.
Mathematical Discrepancies	2006 M2	The Committee's beginning cash balance, \$173,168.41, was greater than the ending cash balance of the Committee's previous report, \$164,982.94, a discrepancy of \$8,185.47.
Failure to Provide Supporting Schedules	Amended 2005 M2, received 8/28/06	The Committee's amended report failed to include all of the activity disclosed on Schedule D previously, resulting in a missing schedule of \$39,568.05.
Failure to Provide Supporting Schedules	Amended 2005 M4, received 8/28/06	The Committee's report disclosed additional disbursements totaling \$36,441.54 for the reporting period.
Failure to Properly Itemize Contributions from Individuals	2005 M3	The Committee failed to provide adequate identification for 15 of 38 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	Amended 2005 M4, received 4/21/05	The Committee failed to provide adequate identification for 19 of 61 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2005 M6	The Committee failed to provide adequate identification for 87 of 172 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2005 M7	The Committee failed to provide adequate identification for 102 of 150 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2005 M8	The Committee failed to provide adequate identification for 27 of 62 contributions from individuals that require itemization.

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Failure to Properly Itemize Contributions from Individuals	2005 M9	The Committee failed to provide adequate identification for 40 of 72 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2005 M10	The Committee failed to provide adequate identification for 68 of 149 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2005 M11	The Committee failed to provide adequate identification for 62 of 124 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2005 M12	The Committee failed to provide adequate identification for 40 of 118 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2005 YE	The Committee failed to provide adequate identification for 59 of 109 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2006 M2	The Committee failed to provide adequate identification for 19 of 26 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2006 M3	The Committee failed to provide adequate identification for 20 of 48 contributions from individuals that require itemization.
Allocated Federal and Non-Federal Activity	2005 M2 and Amended 2005 M2, received 8/4/05	The Committee failed to disclose on Schedule H4 a transfer to its non-federal account for the non-federal share of a refund or rebate of a previously allocated expense, totaling \$9,000.45. The Committee received a transfer totaling \$22,406.19 from its non-federal account for the reimbursement of non-federal activity which was paid out of the federal account. The transfer occurred outside the permissible 70-day transfer period.
Allocated Federal and Non-Federal Activity	Amended 2005 M4, received 8/4/05	On Schedule H1, the Committee failed to indicate to which category(s) of activity the allocation ratio applied.
Allocated Federal and Non-Federal Activity	Amended 2005 M7, received 8/28/06	The Committee failed to provide an adequate purpose for disbursements to eighteen (18) vendors totaling \$14,019.63.
Allocated Federal and Non-Federal Activity	2005 M10	The Committee failed to provide the name and address of the original vendors for credit card payments and adequate purposes for disbursements to two (2) vendors with amounts totaling \$5,619.31.
Allocated Federal and Non-Federal Activity	2006 M3	The Committee incorrectly disclosed on Schedule B transfers to its non-federal account for the non-federal share of refunds or rebates of previously allocated expenses, totaling \$11,323.51.

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Allocated Federal and Non-Federal Activity	Amended 2006 12G, received 11/29/06	<p>The Committee disclosed \$5,000 in disbursements made for "Free Media Radio Interview Tour" on Schedule H4, but failed to clarify whether these disbursements were made on behalf of specifically identified federal candidates.</p> <p>On Schedule H4, the Committee failed to provide the full name and/or mailing address for \$21.50 in disbursements disclosed.</p>
Allocated Federal and Non-Federal Activity	2006 YE	<p>Line 18(a), Column A of the Detailed Summary Page disclosed \$161,394.21 in transfers from the non-federal account for allocable activity for the period. However, Line 21(a)(ii), Column A disclosed \$145,446.70 in the non-federal share of disbursements for the period, resulting in an apparent excessive transfer of approximately \$15,947.51 from the non-federal account.</p>
Failure to Clarify Public Communication Expenses and Possible Candidate Fundraising Expenses	Amended 2005 M4, received 4/21/05	<p>The Committee disclosed \$18,121.16 in disbursements made for "Direct Mail Production," "Direct Mail Costs" and "Postage" on Schedule B, but failed to clarify whether these disbursements were made on behalf of specifically identified federal candidates.</p>

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