

REPORTS ANALYSIS REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: January 30, 2008

ANALYST: Jodi Winship

I. COMMITTEE: Washington State Democratic Central Committee  
C00114439  
Habib M. Habib, Treasurer  
P.O. Box 4027  
Seattle, WA 98194

TYPE OF COMMITTEE: Qualified Party

II. REGISTRATION: October 16, 1979

III. BACKGROUND:

The Committee was sent thirty-three (33) Requests for Additional Information (RFAIs) for reporting errors involving excessive, prohibited and other impermissible contributions or transfers, mathematical discrepancies, failure to provide supporting schedules, Federal Election Activity/Levin funds, allocated federal and non-federal activity, coordinated party expenditure reporting problems and other violations of the Federal Election Campaign Act.

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- TYPE OF COMMITTEE:** Qualified Party
- II. **REGISTRATION:** October 16, 1979
- III. **SUMMARY OF RFAI RESPONSES:** The Committee responded inadequately or provided a late adequate response to sixteen (16) of thirty-three (33) RFAIs sent in the 2005-2006 election cycle.

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STANDARD DESCRIPTION	REPORT(S)	DESCRIPTION OF VIOLATION FOR WHICH AUDIT POINT(S) WAS ASSESSED
Excessive, Prohibited and Other Impermissible Contributions or Transfers	Amended 2005 M5, received 6/17/05	The Committee disclosed a transfer-in on Schedule A totaling \$9,831.79 from a joint fundraiser of a national party committee which was not disclosed on the contributor's disbursement schedule; resulting in an apparent impermissible receipt of \$9,831.79.
Excessive, Prohibited and Other Impermissible Contributions or Transfers	2006 12G	<p>Schedule A of the Committee's report disclosed the receipt of impermissible contributions totaling \$10,000. The impermissible receipts are detailed below:</p> <ul style="list-style-type: none"> <li>• The Committee received a contribution totaling \$5,000 from an unregistered political organization;</li> <li>• The Committee disclosed a transfer-in on Schedule A totaling \$5,000 from an apparent political committee which was not disclosed on the contributor's disbursement schedule.</li> </ul>
Mathematical Discrepancies	2006 M7	The Committee's report contained mathematical discrepancies totaling \$7,500.
Failure to Provide Supporting Schedules	Amended 2005 M3, received 6/17/05	The Committee's report disclosed additional receipts totaling \$23,831.62 for the reporting period.
Federal Election Activity/Levin Funds	Amended 2006 30G, received 1/30/07	On Schedule B, the Committee disclosed \$15,500 in disbursements made for "Mail Piece Additions. See Txt Rec.," but failed to identify the Federal candidates expressly advocated in the public communication.
Allocated Federal and Non-Federal Activity	Amended 2005 M7, received 8/10/05	Schedule H4 disclosed an event year-to-date total of \$237,635.88 for administrative expenses; however, according to FEC calculations the correct total is \$179,808.52, which constitutes a discrepancy of \$57,827.36.
Allocated Federal and Non-Federal Activity	Amended 2005 M8, received 8/25/05	Schedule H4 disclosed an event year-to-date total of \$214,481.01 for administrative expenses; however, according to FEC calculations the correct total is \$272,308.37, which constitutes a discrepancy of \$57,827.36.
Allocated Federal and Non-Federal Activity	2005 YE	Schedule H4 disclosed an event year-to-date total of \$303,670.11 for administrative expenses; however, according to FEC calculations the correct total is \$309,170.11, which constitutes a discrepancy of \$5,500.

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Allocated Federal and Non-Federal Activity	2006 M3	The Committee disclosed disbursements for salary, wages and/or fringe benefits on Schedule H4, resulting in an apparent impermissible transfer-in from the non-federal account of \$6,856.60.
Allocated Federal and Non-Federal Activity	2006 M6	On Schedule H2, the Committee disclosed the ratio as being revised for two (2) fundraising events; however, it failed to provide the date of the events.
Allocated Federal and Non-Federal Activity	2006 M9 and Amended 2006 M9, received 4/20/07	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 \$6,463.27.  Schedule H4 disclosed an event year-to-date total of \$415,325.82 for administrative expenses; however, according to FEC calculations the correct total is \$421,789.09, which constitutes a discrepancy of \$6,463.27.
Allocated Federal and Non-Federal Activity	2006 M10	Schedule H4 disclosed an event year-to-date total of \$529,227.83 for administrative expenses; however, according to FEC calculations the correct total is \$529,867.83, which constitutes a discrepancy of \$640.00.  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 \$10,671.61.
Allocated Federal and Non-Federal Activity	2006 YE	On Schedule H3, the Committee disclosed transfers-in from the non-federal account which may exceed the non-federal share of allocable administrative/voter drive expenditures by as much as \$28,666.76.
Coordinated Party Expenditure Reporting Problems	2006 YE	The Committee failed to clarify two (2) coordinated party expenditures disclosed on Schedule F totaling \$7,600 which were made after the date of the general election.
Other Violations of the Federal Election Campaign Act	Amended 2005 M7, received 10/12/05	On Schedule H4, the Committee disclosed the receipt of \$60,000 for the return of embezzled funds.

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