

REPORTS ANALYSIS REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: January 31, 2008

ANALYST: Michael H. Hartsock

I. COMMITTEE: Republican Leadership Council Federal Political Action
Committee (FKA It's My Party)
C00409169
Ronald R. Gravino, Treasurer (4/21/05 – present)
Kate Whitman, Treasurer (1/25/05 – 4/20/05)
P.O. Box 225
Colonia, NJ 07067

TYPE OF COMMITTEE Qualified Non-Party (Nonconnected)

II. REGISTRATION: January 25, 2005

III. BACKGROUND:

The Committee was sent eight (8) Requests for Additional Information (RFAs) for reporting errors involving excessive, prohibited and other impermissible contributions, mathematical discrepancies, failure to provide supporting schedules, failure to properly itemize contributions from individuals, failure to properly itemize contributions and transfers to political committees, failure to properly itemize disbursements, failure to clarify public communication expenses and possible candidate fundraising expenses and failure to disclose sufficient administrative expenses. Furthermore, the Committee was sent a late filer notice for failing to timely file one (1) report.

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VIOLATION DESCRIPTION	REPORT(S)	DETAILS OF VIOLATION
Failure to File Reports and Late Filing	2005 MY	The Committee filed the 2005 Mid-Year Report 45 days late.
Excessive, Prohibited, and Other Impermissible Contributions or Transfers	2005 YE	Schedule B of the Committee's report disclosed excessive contributions made to two (2) federal candidates totaling \$5,800.
Mathematical Discrepancies	2006 Q2	<p>The Committee's report contained mathematical discrepancies totaling \$372,756.92, as detailed below:</p> <ul style="list-style-type: none"> • The Committee's beginning cash balance, \$155,023.67, was greater than the ending cash balance of the Committee's previous report, \$29,023.67, a discrepancy of \$126,000. • The Committee's report contained Column B discrepancies totaling \$111,395.90. • Line 8, Column A of the Summary Page, \$69,829.09, did not equal Line 8, Column B of the Summary Page, negative \$65,531.93, a discrepancy of \$135,361.02.
Failure to Provide Supporting Schedules	Amended 2005 YE, received 9/28/06	The Committee's report disclosed additional receipts totaling \$16,036.29 for the reporting period.
Failure to Provide Supporting Schedules	Amended 2006 Q2, received 9/11/06 and Amended 2006 Q2, received 10/10/06	The Committee's report disclosed additional receipts totaling \$150,511.54 for the reporting period.
Failure to Properly Itemize Contributions from Individuals	2005 YE	The Committee failed to provide adequate identification for 31 of 113 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2006 Q1	The Committee failed to provide adequate identification for 93 of 327 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2006 Q2	The Committee failed to provide adequate identification for 43 of 95 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions and Transfers to Political Committees	2005 YE	The Committee failed to provide the office sought, state and district for five (5) contributions to federal candidates totaling \$12,500.
Failure to Properly Itemize Disbursements	2005 YE	The Committee failed to provide an adequate purpose for disbursements to 15 of 45 vendors and individuals requiring itemization.

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<p>Failure to Clarify Public Communication Expenses and Possible Candidate Fundraising Expenses</p>	<p>2005 MY</p>	<p>The Committee disclosed \$15,040.10 in disbursements made for "Event Expense", "Event Expense – Fundraising", "Fundraising Consulting", and "Printing" on Schedule B, but failed to clarify whether these disbursements were made on behalf of specifically identified federal candidates.</p>
<p>Failure to Clarify Public Communication Expenses and Possible Candidate Fundraising Expenses</p>	<p>2005 YE</p>	<p>The Committee disclosed \$70,939.80 in disbursements made for "Catering", "Direct Mail Expense", "Event Expense", "Event Expense Reimbursement", "Fundraising Consulting", "Mailing", "Mailing Expense", "Printing Expense", and "Telecommunications" on Schedule B, but failed to clarify whether these disbursements were made on behalf of specifically identified federal candidates.</p>
<p>Failure to Clarify Public Communication Expenses and Possible Candidate Fundraising Expenses</p>	<p>2006 Q2</p>	<p>The Committee disclosed \$145,271.91 in disbursements made for "Consulting – Communications", "Consulting – Fundraising", "Direct Mail", "Fundraising – Consulting", "Fundraising Expense", "Mail", "Printing Expense", "Reimbursement – Event Cost FR", "Reimbursement – Fundraising", "Reimbursement – Postage", and "Telecommunications" on Schedule B, but failed to clarify whether these disbursements were made on behalf of specifically identified federal candidates.</p>
<p>Administrative Expenses</p>	<p>2005 MY</p>	<p>The Committee disclosed disbursements totaling \$76,837.93; however, the report disclosed limited payments for administrative expenses.</p>

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