

REPORTS ANALYSIS REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: February 25, 2008

ANALYST: Daniel T. Buckley

I. COMMITTEE: Missouri Democratic State Committee
 C00135558
 Rod Anderson, Treasurer
 P.O. Box 719
 Jefferson City, MO 65102

TYPE OF COMMITTEE Party

II. REGISTRATION: September 15, 1980

III. BACKGROUND:

The Committee was sent twenty-six (26) Requests for Additional Information (RFAIs) for reporting errors involving excessive, prohibited and other impermissible contributions or transfers, mathematical discrepancies, failure to provide supporting schedules, failure to properly itemize contributions from individuals, failure to properly itemize contributions and transfers from political committees, Federal Election Activity/Levin funds, and allocated federal and non-federal activity.

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| VIOLATION DESCRIPTION | REPORT(S) | DETAILS OF VIOLATION |
|---------------------------------------------------------------------------|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Excessive, Prohibited, and Other Impermissible Contributions or Transfers | 2005 M6 | Schedule A of the Committee's report disclosed the receipt of impermissible contributions totaling \$6,100.00 from three (3) unregistered political organizations. |
| Excessive, Prohibited, and Other Impermissible Contributions or Transfers | Amended 2005 M6, received 5/26/06 | The Committee disclosed a transfer-out to an apparent non-federal account for the misdeposit of contributions intended for the non-federal account totaling \$10,000.00. However, the Committee failed to clarify the date of the original deposit into the federal account. |
| Excessive, Prohibited, and Other Impermissible Contributions or Transfers | 2005 M7 | Schedule A of the Committee's report disclosed the receipt of excessive and prohibited contributions totaling \$15,000.00 from one (1) political committee and two (2) labor organizations. |
| Excessive, Prohibited, and Other Impermissible Contributions or Transfers | 2005 M9 | Schedule A of the Committee's report disclosed the receipt of impermissible contributions totaling \$3,115.00 from six (6) unregistered political organizations. |
| Excessive, Prohibited, and Other Impermissible Contributions or Transfers | Amended 2006 30G, received 1/23/07 | Schedule A of the Committee's report disclosed the receipt of excessive contributions totaling \$6,912.50 from four (4) individuals. |
| Failure to Provide Supporting Schedules | Amended 2005 M5, received 6/20/05 | The Committee's report disclosed additional disbursements totaling \$23,161.65 for the reporting period. |
| Failure to Provide Supporting Schedules | 2005 M10 | <p>Schedule A supporting Line 12 of the Committee's reports for a three-month period disclosed \$136.18 in transfers received from a joint fundraiser. However, the Committee failed to provide a memo Schedule A itemizing its share of the gross contributions received through the joint fundraiser.</p> <p>Schedule A supporting Line 12 of the Committee's reports for a three-month period disclosed \$11,164.40 in a memo Schedule A itemizing its share of the gross contributions received through a joint fundraiser. However, the Committee failed to disclose any transfers received from the joint fundraiser.</p> |
| Failure to Provide Supporting Schedules | 2005 YE | Schedule A supporting Line 12 disclosed a memo Schedule A totaling \$43,051.60 to itemize the Committee's share of gross contributions received through a joint fundraiser. However, the Committee's report failed to indicate which joint fundraiser the memos related to. |
| Failure to Provide Supporting Schedules | Amended 2005 YE, received | Schedule A supporting Line 12 of the Committee's reports for a three-month period disclosed \$26,628.00 |

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| | 5/26/06 | in a memo Schedule A itemizing its share of the gross contributions received through a joint fundraiser. However, the Committee failed to disclose any transfers received from the joint fundraiser. |
| Failure to Provide Supporting Schedules | 2006 M10 | Schedule A supporting Line 12 of the Committee's reports for a three-month period disclosed \$20,913.30 in a memo Schedule A itemizing its share of the gross contributions received through a joint fundraiser. However, the Committee failed to disclose any transfers received from the joint fundraiser. |
| Failure to Provide Supporting Schedules | Amended 2006 YE, received 1/31/07 | Schedule A supporting Line 12 of the Committee's reports for a three-month period disclosed \$487,846.62 in transfers received from three (3) joint fundraisers. However, the supporting itemized memo entries provided on Schedule A total \$366,988.47, creating a discrepancy of \$120,858.15. |
| Federal Election Activity/Levin Funds | 2006 M8 | The Committee disclosed an account name of "Non-Fed Levin" on Schedule L, which appeared to function as both a non-federal and Levin account. However, the Committee failed to clarify if they were using a reasonable accounting method to ensure that they had received sufficient Levin funds to support Levin disbursements from the account. |
| Federal Election Activity/Levin Funds | 2006 12G | On Schedule B, the Committee disclosed \$226,800.00 in disbursements made for "Direct Mailing," but failed to clarify whether these disbursements were FEA public communications that promoted, supported, attacked or opposed Federal candidates or if they expressly advocated the election or defeat of clearly identified Federal candidates. |
| Federal Election Activity/Levin Funds | Amended 2006 30G, received 1/23/07 | On Schedule B, the Committee disclosed \$15,000.00 in disbursements made for "Postage," but failed to clarify whether these disbursements were FEA public communications that promoted, supported, attacked or opposed Federal candidates or if they expressly advocated the election or defeat of clearly identified Federal candidates. |
| Allocated Federal and Non-Federal Activity | 2005 M4 | The Committee failed to clarify whether the appropriate category was used for a payment totaling \$5,100.00 that was categorized on Schedule H4 as an Administrative expense with a purpose indicating it was a Generic Voter Drive expense. |
| Allocated Federal and Non-Federal Activity | 2005 M6 | The Committee failed to clarify whether the appropriate category was used for a payment totaling \$8,500.00 that was categorized on Schedule H4 as an Administrative expense with a purpose indicating it was a Generic Voter Drive expense. |

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| Allocated Federal and Non-Federal Activity | 2005 M7 | <p>The Committee failed to clarify transfers made to an apparent non-federal account disclosed on Schedule B totaling \$10,000.00.</p> <p>The Committee failed to disclose on Schedule H4 a transfer to its non-federal account for the non-federal share of voided checks for previously allocated expenses, totaling \$6,415.79.</p> |
| Allocated Federal and Non-Federal Activity | 2005 M9 | <p>The Committee failed to clarify transfers made to an apparent non-federal account disclosed on Schedule B, totaling \$10,400.00.</p> <p>The Committee failed to disclose on Schedule H4 a transfer to its non-federal account for the non-federal share of a voided check for a previously allocated expense, totaling \$250.22.</p> <p>The Committee failed to clarify whether the appropriate category was used for a payment totaling \$5,100.00 that was categorized on Schedule H4 as an Administrative expense with a purpose indicating it was a Generic Voter Drive expense.</p> |
| Allocated Federal and Non-Federal Activity | 2005 M10 | <p>Schedule B disclosed payments to the non-federal account totaling \$5,300.98 for the "federal share of allocable expenses mistakenly made from Non-federal account."</p> <p>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 \$8,705.80.</p> <p>The Committee disclosed a payment for "Inaugural Gifts" on Schedule H4, which did not appear to meet the definition of an allocable expense, resulting in an apparent impermissible transfer-in from the non-federal account of \$466.10.</p> |
| Allocated Federal and Non-Federal Activity | 2005 YE | <p>The Committee failed to clarify whether the appropriate category was used for a payment totaling \$10,000.00 that was categorized on Schedule H4 as an Administrative expense with a purpose indicating it was a Generic Voter Drive expense.</p> |

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