

REPORTS ANALYSIS REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: February 27, 2008

ANALYST: Julie Fleming

I. COMMITTEE: Pennsylvania Democratic Party
C00167130
Ann M. Bursis, Treasurer (10/23/06 – present)
James Byrnes, Treasurer (6/20/98 – 10/22/06)
300 North Second Street, 8th Floor
Harrisburg, PA 17101

TYPE OF COMMITTEE Party

II. REGISTRATION: April 29, 1983

III. BACKGROUND:

The Committee was sent twenty-five (25) Requests for Additional Information (RFAIs) for reporting errors involving excessive, prohibited and other impermissible contributions and 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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Pennsylvania Democratic Party
C00167130

VIOLATION DESCRIPTION	REPORT(S)	DETAILS OF VIOLATION
Excessive, Prohibited and Other Impermissible Contributions and Transfers	2006 12G	<p>Schedule A of the Committee's report disclosed the receipt of excessive contributions and the disbursement of excessive coordinated expenditures totaling \$43,680.95. The excessive contributions were received from one (1) individual and one (1) multicandidate committee, and the coordinated expenditures were made on behalf of one (1) federal candidate.</p> <p>Schedule F supporting Line 25 of the Detailed Summary Page disclosed an apparent reimbursement to a non-federal account for "Local Taxes," "Payroll Fees," "Federal State & Unemployment Taxes," and "Worker's Compensation" totaling \$920.15, resulting in a non-federal account financing federal election activity.</p>
Excessive, Prohibited and Other Impermissible Contributions and Transfers	2006 30G and Amended 2006 30G, received 3/27/07	<p>Schedule A of the Committee's report disclosed the receipt of apparent impermissible contributions totaling \$66,936.12 from one (1) unregistered political organization and one (1) local party committee.</p> <p>The Committee disclosed a transfer-in totaling \$26,031.76 on Schedule A supporting Line 12 from a local party committee for the apparent misdeposit of contributions originally intended for the non-federal account.</p>
Mathematical Discrepancies	2006 M10	The aggregate general election expenditure total on Schedule F does not appear to accurately reflect the coordinated expenditures made to support one (1) federal candidate, creating a discrepancy of \$27,017.93.
Mathematical Discrepancies	2006 12G	The aggregate general election expenditure total on Schedule F does not appear to accurately reflect the coordinated expenditures made to support one (1) federal candidate, creating a discrepancy of \$28,821.30.
Mathematical Discrepancies	2006 30G	The aggregate general election expenditure totals on Schedule F do not appear to accurately reflect the coordinated expenditures made to support two (2) federal candidates, creating a discrepancy of \$78,406.86.
Failure to Provide Supporting Schedules	2006 M7	Schedule A supporting Line 12 of the Committee's reports for a three-month period disclosed \$60,556.63 in transfers received from a joint fundraiser. However, the supporting itemized memo entries provided on Schedule A total \$44,835.73, creating a discrepancy of \$15,720.90.

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<p>Failure to Provide Supporting Schedules</p>	<p>2006 YE</p>	<p>Schedule A supporting Line 12 of the Committee's reports for a three-month period disclosed \$56,111.96 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 \$909,447.99 in transfers received from a joint fundraiser. However, the supporting itemized memo entries provided on Schedule A total \$156,800.00, creating a discrepancy of \$752,647.99.</p>
<p>Failure to Properly Itemize Contributions from Individuals</p>	<p>2005 YE</p>	<p>The Committee failed to provide adequate identification for 17 of 51 contributions from individuals that require itemization.</p>
<p>Failure to Properly Itemize Contributions from Individuals</p>	<p>2006 30G</p>	<p>The Committee failed to provide adequate identification for 22 of 78 contributions from individuals that require itemization.</p>
<p>Failure to Properly Itemize Contributions and Transfers from Political Committees</p>	<p>2006 M8</p>	<p>The Committee failed to provide the purpose for three (3) receipts from federal candidates totaling \$158,540.00.</p>
<p>Federal Election Activity/Levin Funds</p>	<p>2006 12G</p>	<p>On Schedule B, the Committee disclosed \$526,914.54 in disbursements made for "Design Mail House Production" and "Postage for Absentee Ballot Mail," 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.</p>
<p>Federal Election Activity/Levin Funds</p>	<p>2006 30G</p>	<p>On Schedule L, the Committee's beginning cash balance for the "PALevinNFV06" account, \$60,921.41, was greater than the ending cash balance disclosed for this account on the Committee's previous report, \$50,752.62, a discrepancy of \$10,168.79.</p>
<p>Federal Election Activity/Levin Funds</p>	<p>2006 YE</p>	<p>The Committee's report contained mathematical discrepancies on Schedule L totaling \$40,000.00.</p> <p>On Schedule L, the Committee's beginning cash balance for the "PALevinNFV06" account, \$66,136.86, was greater than the ending cash balance disclosed for this account on the Committee's previous report, \$50,752.62, a discrepancy of \$15,384.24.</p>
<p>Allocated Federal and Non-Federal Activity</p>	<p>2006 M8</p>	<p>The Committee failed to address an apparent impermissible transfer of \$25,238.16 from the non-federal account that occurred as a result of allocating payments on Schedule H4 between the federal and non-federal accounts for apparent Federal Election</p>

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		Activity (FEA). The apparent FEA Voter Identification activity was conducted in connection with an election in which one or more candidates for Federal office appeared on the ballot.
Allocated Federal and Non-Federal Activity	2006 M10	The Committee failed to address an apparent impermissible transfer of \$23,700.00 from the non-federal account that occurred as a result of allocating payments on Schedule H4 between the federal and non-federal accounts for apparent Federal Election Activity (FEA). The apparent FEA Voter Identification activity was conducted in connection with an election in which one or more candidates for Federal office appeared on the ballot.
Allocated Federal and Non-Federal Activity	2006 12G	<p>The Committee failed to clarify transfers made to an apparent non-federal account disclosed on Schedule B totaling \$8,716.15.</p> <p>The Committee failed to address an apparent impermissible transfer of \$4,740.00 from the non-federal account that occurred as a result of allocating payments on Schedule H4 between the federal and non-federal accounts for apparent Federal Election Activity (FEA). The apparent FEA Voter Identification activity was conducted in connection with an election in which one or more candidates for Federal office appeared on the ballot.</p>

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