

REPORTS ANALYSIS REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: March 7, 2008

ANALYST: Rosa G. Lewis

I. COMMITTEE: South Dakota Republican Party
C00044990
Paul Knecht, Treasurer (3/20/07-Present)
Thomas G. Leckey (3/6/03-3/19/07)
415 South Pierre Street
Pierre, SD 57501

TYPE OF COMMITTEE Party

II. REGISTRATION: July 14, 1975

III. BACKGROUND:

The Committee was sent twenty-two (22) Requests for Additional Information (RFAs) 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, Federal Election Activity/Levin funds, allocated federal and non-federal activity, and coordinated party expenditure reporting problems. Furthermore, the Committee was sent non-filer notices for failing to timely file two (2) reports.

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VIOLATION DESCRIPTION	REPORT(S)	DETAILS OF VIOLATION
Failure to File Reports and Late Filing	2005 M8	The Committee filed the 2005 August Monthly Report thirty (30) days late.
Failure to File Reports and Late Filing	2005 M11	The Committee filed the 2005 November Monthly Report thirty (30) days late.
Prohibited Contributions and Other Impermissible Contributions and Transfers	2006 M4	Schedule A of the Committee's report disclosed the receipt of impermissible contributions totaling \$6,977.50 from six (6) unregistered political organizations.
Prohibited Contributions and Other Impermissible Contributions and Transfers	2006 M6	Schedule A of the Committee's report disclosed the receipt of impermissible contributions totaling \$4,306.90 from six (6) unregistered political organizations.
Prohibited Contributions and Other Impermissible Contributions and Transfers	2006 M8	Schedule A of the Committee's report disclosed the receipt of an excessive contribution totaling \$5,000.00 from one (1) multicandidate committee.
Mathematical Discrepancies	2006 M3	<p>The Committee's report contained mathematical discrepancies totaling \$12,576.40.</p> <p>Line 8, Column A of the Summary Page, \$1,033,501.91, did not equal Line 8, Column B of the Summary Page, \$1,036,646.01, a discrepancy of \$3,144.10.</p>
Mathematical Discrepancies	2006 M4	<p>The Committee's report contained mathematical discrepancies totaling \$21,967.67, as detailed below:</p> <ul style="list-style-type: none"> • The Committee's beginning cash balance, \$1,036,646.01, is greater than the ending cash balance of the Committee's previous report, \$1,033,501.91, a discrepancy of \$3,144.10. • The Committee's report contained Column B discrepancies totaling \$15,200.20. • Line 8, Column A of the Summary Page, \$1,031,765.00, did not equal Line 8, Column B of the Summary Page, \$1,035,388.37, a discrepancy of \$3,623.37.
Mathematical Discrepancies	2006 M5	<p>The Committee's report contained mathematical discrepancies totaling \$15,502.67, as detailed below:</p> <ul style="list-style-type: none"> • The Committee's beginning cash balance, \$1,035,388.37, is greater than the ending cash balance of the Committee's previous report, \$1,031,765.00, a discrepancy of \$3,623.37.

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		<ul style="list-style-type: none"> • The Committee's report contained Column B discrepancies totaling \$9,503.44. • Line 8, Column A of the Summary Page, \$1,047,565.31, did not equal Line 8, Column B of the Summary Page, \$1,049,941.17, a discrepancy of \$2,375.86.
Mathematical Discrepancies	2006 M6	The Committee's beginning cash balance, \$1,049,941.17, is greater than the ending cash balance of the Committee's previous report, \$1,047,565.31, a discrepancy of \$2,375.86.
Mathematical Discrepancies	2006 M7	<p>The Committee's report contained mathematical discrepancies totaling \$5,400.64.</p> <p>Line 8, Column A of the Summary Page, \$1,013,617.47, did not equal Line 8, Column B of the Summary Page, \$1,014,967.63, a discrepancy of \$1,350.16.</p>
Mathematical Discrepancies	2006 M8	<p>The Committee's report contained mathematical discrepancies totaling \$69,332.19, as detailed below:</p> <ul style="list-style-type: none"> • The Committee's beginning cash balance, \$1,014,967.63, is greater than the ending cash balance of the Committee's previous report, \$1,013,617.47, a discrepancy of \$1,350.16. • The Committee's report contained Column B discrepancies totaling \$57,260.79. • Line 8, Column A of the Summary Page, \$917,088.52, did not equal Line 8, Column B of the Summary Page, \$927,809.76, a discrepancy of \$10,721.24
Mathematical Discrepancies	2006 M9	<p>The Committee's report contained mathematical discrepancies totaling \$21,096.54, as detailed below:</p> <ul style="list-style-type: none"> • The Committee's beginning cash balance, \$927,809.76, is greater than the ending cash balance of the Committee's previous report, \$917,088.52, a discrepancy of \$10,721.24. • The Committee's report contained Column B discrepancies totaling \$8,300.24. • Line 8, Column A of the Summary Page, \$660,583.27, did not equal Line 8, Column B of the Summary Page, \$662,658.33, a discrepancy of \$2,075.06.

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Mathematical Discrepancies	2006 12G	The Committee's report contained mathematical discrepancies totaling \$4,954.04. Line 8, Column A of the Summary Page, \$300,829.54, did not equal Line 8, Column B of the Summary Page, \$107,809.20, a discrepancy of \$193,020.34.
Failure to Provide Supporting Schedules	Amended 2005 M4, received 4/21/05	Schedule A of the Committee's report disclosed an offset to an operating expenditure totaling \$165,464.32. However, the Committee failed to disclose any payments to this vendor on its disbursement schedules.
Failure to Provide Supporting Schedules	2005 M5	Schedule A of the Committee's report disclosed an offset to an operating expenditure totaling \$12,415.00. However, the Committee failed to disclose any payments to this vendor on its disbursement schedules.
Failure to Properly Itemize Contributions from Individuals	Amended 2005 M2, received 4/20/05	The Committee failed to provide adequate identification for 13 of 49 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	Amended 2005 M3, received 4/20/05	The Committee failed to provide adequate identification for 12 of 30 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2005 M5	The Committee failed to provide adequate identification for 12 of 59 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2005 M6	The Committee failed to provide adequate identification for 17 of 81 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2005 M8	The Committee failed to provide adequate identification for 12 of 53 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2005 M9	The Committee failed to provide adequate identification for 18 of 68 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2006 M8	The Committee failed to provide adequate identification for 23 of 94 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2006 M9	The Committee failed to provide adequate identification for 21 of 65 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions from Individuals	2006 M10	The Committee failed to provide adequate identification for 27 of 78 contributions from individuals that require itemization.

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Failure to Properly Itemize Contributions from Individuals	2006 12G	The Committee failed to provide adequate identification for 12 of 52 contributions from individuals that require itemization.
Federal Election Activity/Levin Funds	2005 M8	On Schedule B, the Committee disclosed \$66,227.88 in disbursements made for "GOTV 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.
Federal Election Activity/Levin Funds	2005 M11	On Schedule B, the Committee disclosed \$5,847.02 in disbursements made for "printing" and "mailing cost for any fed. Candidate," 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	2005 YE	On Schedule B, the Committee disclosed \$6,320.30 in disbursements made for "Mailing Cost for Any Fed Candidate," 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	2006 M2	On Schedule B, the Committee disclosed \$7,138.89 in disbursements made for "Mailing Cost for Any Fed Candidate," 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	2006 M3	On Schedule B and H4, the Committee disclosed \$10,099.07 in disbursements made for "Mailing Cost for Any Fed Candidate," 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	2006 M5	On Schedule B, the Committee disclosed \$5,127.86 in disbursements made for "Mailing Cost for Any Fed Candidate," 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	2006 M7	On Schedule B, the Committee disclosed \$5,337.81 in disbursements made for "Mailing Cost for Any Fed Candidate," but failed to clarify whether these

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		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	2006 M8	On Schedule B, the Committee disclosed \$10,526.51 in disbursements made for "Mailing Cost for Any Fed Candidate," 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	2006 M9	On Schedule B, the Committee disclosed \$13,304.98 in disbursements made for "Mailing Cost for Any Fed Candidate," "Direct Mailings," and "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.
Federal Election Activity/Levin Funds	2006 M10	On Schedule B and H4, the Committee disclosed \$27,042.69 in disbursements made for "Mailing Cost for Any Fed Candidate" and "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.
Federal Election Activity/Levin Funds	2006 12G	On Schedule B, the Committee disclosed \$12,889.04 in disbursements made for "Mailing Cost for Any Fed Candidate," 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	Amended 2005 M2, received 4/20/05	On Schedule H1, the Committee checked an incorrect fixed percentage for allocated federal and non-federal administrative, generic voter drive, and exempt activity costs.
Allocated Federal and Non-Federal Activity	2005 YE	On Schedule H1, the Committee checked an incorrect fixed percentage for allocated federal and non-federal administrative, generic voter drive, and exempt activity costs.
Allocated Federal and Non-Federal Activity	2006 M2	On Schedule H1, the Committee checked an incorrect fixed percentage for allocated federal and non-federal administrative, generic voter drive, and exempt activity costs.

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Allocated Federal and Non-Federal Activity	2006 M6	<p>The Committee failed to provide an adequate purpose for disbursements to one (1) vendor totaling \$3,800.00.</p> <p>Schedule B disclosed \$539.00 in disbursements for apparent travel reimbursements to individuals; however, the Committee failed to provide supporting MEMO entries.</p> <p>Schedule B disclosed \$2,500 in disbursements for apparent non-travel reimbursements to individuals; however, the Committee failed to provide supporting MEMO entries.</p> <p>Schedule H4 of the Committee's report disclosed \$221.78 in payments for apparent credit card expenses. However, the Committee failed to provide a memo Schedule H4 itemizing the name and address of the original vendors for these payments.</p>
Allocated Federal and Non-Federal Activity	2006 M7	Schedule H4 of the Committee's report disclosed \$78,000.00 in transfers to its non-federal account which do not appear to qualify as shared expenses to be allocated between the federal and non-federal accounts.
Allocated Federal and Non-Federal Activity	2006 M8	Schedule H4 of the Committee's report disclosed \$130,000.00 in transfers to its non-federal account which do not appear to qualify as shared expenses to be allocated between the federal and non-federal accounts.
Allocated Federal and Non-Federal Activity	2006 M9	Schedule H4 of the Committee's report disclosed \$250,000.00 in transfers to its non-federal account which do not appear to qualify as shared expenses to be allocated between the federal and non-federal accounts.
Allocated Federal and Non-Federal Activity	2006 12G	Schedule H4 of the Committee's report disclosed \$174,000 in transfers to its non-federal account which do not appear to qualify as shared expenses to be allocated between the federal and non-federal accounts.
Coordinated Expenditure Reporting Problems	2006 M9	Schedule F of the Committee's report disclosed \$6,393.49 in coordinated expenditures made on behalf of a federal candidate; however, the Committee failed to disclose the identification of the candidate supported, the office sought, and state and district (where applicable).

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