

REPORTS ANALYSIS REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: December 12, 2008

ANALYST: Maureen Benitz

I. COMMITTEE: Democratic Party of Virginia  
C00155952  
Abbi Easter, Treasurer  
1710 E. Franklin Street  
Richmond, VA 23223

TYPE OF COMMITTEE Party

II. REGISTRATION: May 17, 1982

III. BACKGROUND:

The Committee was sent thirty one (31) Requests for Additional Information (RFAs) and failed to respond, responded inadequately or responded late to sixteen (16) of these requests which included 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, Federal Election Activity/Levin funds, allocated federal and non-federal activity, coordinated expenditure reporting problems and failure to clarify public communication expenses and possible candidate fundraising expenses.

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VIOLATION DESCRIPTION	REPORT(S)	DETAILS OF VIOLATION
Excessive, Prohibited and Other Impermissible Contributions or Transfers	2005 M8	Schedule A of the Committee's report disclosed the receipt of an excessive contribution totaling \$5,000.00, received from one (1) multicandidate committee.
Excessive, Prohibited and Other Impermissible Contributions or Transfers	2006 M10	Schedule A of the Committee's report disclosed the receipt of an excessive contribution totaling \$5,000.00, received from one (1) multicandidate committee.
Excessive, Prohibited and Other Impermissible Contributions or Transfers	2006 Amended 30G, received 5/18/07	Schedule F supporting Line 25 of the Detailed Summary Page disclosed apparent excessive coordinated expenditures totaling \$9,400.00, made on behalf of one (1) federal candidate.
Mathematical Discrepancies	2005 M12	The Committee's report contained mathematical discrepancies totaling \$265,762.76.
Mathematical Discrepancies	2005 YE	The Committee's beginning cash balance, \$73,902.43, was less than the ending cash balance of the Committee's previous report, \$111,698.04, a discrepancy of \$37,795.61.
Mathematical Discrepancies	2006 Amended 12G, received 1/24/07	The Committee's report contained mathematical discrepancies totaling \$10,615.00.
Failure to Provide Supporting Schedules	2005 M4	Schedule A supporting Line 12 of the Committee's reports for a 3-month period disclosed \$27,839.89 in memo entries on Schedule A received from a joint fundraiser. However, the Committee failed to disclose corresponding transfers-in from the related joint fundraising committee.
Failure to Provide Supporting Schedules	2005 Amended YE, received 3/30/06	The Committee's report disclosed a negative ending cash balance of \$8,267.59.
Failure to Provide Supporting Schedules	2006 Amended M3, received 5/5/06	The Committee's report disclosed additional receipts totaling \$16,215.00 for the reporting period.
Failure to Provide Supporting Schedules	2006 30G	Schedule D of the Committee's previous report disclosed one (1) debt totaling \$2,178.37 with an outstanding ending balance; however, this debt was not disclosed as outstanding on this report.
Failure to Provide Supporting Schedules	2006 Amended 30G, received 3/22/07	The Committee's report disclosed additional disbursements totaling \$155,971.70 for the reporting period.
Failure to Properly Itemize Contributions from Individuals	2006 M3	The Committee failed to provide adequate identification for 70 of 128 of the contributions from individuals that require itemization.

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Federal Election Activity/Levin Funds	2006 12G	On Schedule B, the Committee disclosed \$27,929.24 in disbursements made for "Federal Fundraising Mail Postage", and "Postage - Exempt Candidate Mail/Webb" 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 30G	On Schedule B the Committee disclosed \$137,840.01 in disbursements made for "Exempt Candidate Mail Postage", "Exempt Grassroots Campaign Materials", "GOTV Direct Mail Production", "Media???", "Postage for Sample Ballot", and "Postage - Exempt Candidate Mail/Webb" 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 M6	On Schedule H4, the Committee failed to timely transfer \$5,328.38 to the non-federal account for the federal account's share of an in-kind corporate donation.
Allocated Federal and Non-Federal Activity	2005 M12	<p>Schedule H4 disclosed an event year-to-date total for Administrative expenses of \$1,095,651.82; however, FEC calculations disclose this total to be \$1,096,076.01, resulting in a discrepancy of \$424.19.</p> <p>The Committee failed to provide an adequate purpose for disbursements to twenty-seven (27) individuals and one (1) vendor totaling \$25,647.32.</p> <p>On Schedule H4, the Committee failed to provide the full name and/or mailing address for \$323.63 in disbursements disclosed.</p>
Coordinated Expenditure Reporting Problems	2006 Amended 30G, received 3/22/07	Schedule F of the Committee's report failed to disclose the mailing address of the payee and the identification of the candidate for two (2) coordinated party expenditures totaling \$86,362.89.
Failure to Clarify Public Communication Expenses and Possible Candidate Fund-Raising Expenses	2006 M9	The Committee disclosed \$24,958.58 in disbursements made for "Fundraising Consulting" on Schedule B, but failed to clarify whether these disbursements were made on behalf of specifically identified federal candidates.

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