

REPORTS ANALYSIS REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: December 23, 2008

ANALYST: Corbin T. Jones

I. COMMITTEE: Monterey County Republican Central Committee Fed
C00389981
Chris Steinbruner, Treasurer
P.O. Box 322
Salinas, CA 93902

TYPE OF COMMITTEE Party

II. REGISTRATION: September 2, 2003

III. BACKGROUND:

The Committee was sent fourteen (14) Requests for Additional Information (RFAs) and failed to adequately respond to thirteen (13) of these requests which included reporting errors involving excessive, prohibited and other impermissible contributions or transfers, mathematical discrepancies, Federal Election Activity/Levin funds, and allocated federal and non-federal activity. Furthermore, the Committee failed to timely file one (1) report for which an Administrative Fine (AF 1410) was assessed.

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VIOLATION DESCRIPTION	REPORT(S)	DETAILS OF VIOLATION
Failure to File Reports and Late Filing	2005 M5	The Committee filed the 2005 May Monthly Report twelve (12) days late.
Excessive, Prohibited and Other Impermissible Contributions or Transfers	2006 M4	Schedule A of the Committee's report disclosed three (3) receipts for "January Rent for Office Space Rental," "February Rent for Office Space Rental" and "March Rent for Office Space" from an apparent unregistered political committee without clarifying whether the usual and normal charge was assessed for the services provided. The apparent impermissible receipt totals \$6,000.00.
Mathematical Discrepancies	2005 M3	<p>The Committee's report contained mathematical discrepancies totaling \$35,100.03, as detailed below:</p> <ul style="list-style-type: none"> • The Committee's beginning cash balance, \$19,165.16, is greater than the ending cash balance of the Committee's previous report, \$19,215.16, a discrepancy of \$50.00. • Line 6(a) of the Summary Page, \$3,961.77, representing the total cash-on-hand as of January 1, 2005, is less than the figure disclosed on Line 6(a) of the Committee's 2005 February Monthly Report, \$4,011.77, a discrepancy of \$50.00. • The Committee's report contained mathematical discrepancies totaling \$35,000.03.
Mathematical Discrepancies	2005 M4	<p>The Committee's report contained mathematical discrepancies totaling \$20,850.03, as detailed below:</p> <ul style="list-style-type: none"> • Line 6(a) of the Summary Page, \$3,961.77, representing the total cash-on-hand as of January 1, 2005, is less than the figure disclosed on Line 6(a) of the Committee's 2005 February Monthly Report, \$4,011.77, a discrepancy of \$50.00. • The Committee's report contained mathematical discrepancies totaling \$20,800.03.
Mathematical Discrepancies	2005 M5	<p>The Committee's report contained mathematical discrepancies totaling \$70,720.00, as detailed below:</p> <ul style="list-style-type: none"> • Line 6(a) of the Summary Page, \$3,961.77, representing the total cash-on-hand as of January 1, 2005, is less than the figure disclosed on Line 6(a) of the Committee's 2005 February Monthly Report, \$4,011.77, a discrepancy of \$50.00. • The Committee's report contained mathematical discrepancies totaling \$70,670.00.

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Mathematical Discrepancies	2005 M6	<p>The Committee's report contained mathematical discrepancies totaling \$45,750.06, as detailed below:</p> <ul style="list-style-type: none"> • Line 6(a) of the Summary Page, \$3,961.77, representing the total cash-on-hand as of January 1, 2005, is less than the figure disclosed on Line 6(a) of the Committee's 2005 February Monthly Report, \$4,011.77, a discrepancy of \$50.00. • The Committee's report contained mathematical discrepancies totaling \$45,700.06.
Mathematical Discrepancies	2005 M8	The Committee's report contained mathematical discrepancies totaling \$34,802.00.
Mathematical Discrepancies	2005 M9	The Committee's report contained mathematical discrepancies totaling \$58,200.00.
Mathematical Discrepancies	2005 M11	<p>The Committee's report contained mathematical discrepancies totaling \$337,922.00 as detailed below:</p> <ul style="list-style-type: none"> • Line 6(a) of the Summary Page, \$3,961.77, representing the total cash-on-hand as of January 1, 2005, is less than the figure disclosed on Line 6(a) of the Committee's 2005 February Monthly Report, \$4,011.77, a discrepancy of \$50.00. • The Committee's Report contained mathematical discrepancies totaling \$337,872.00.
Mathematical Discrepancies	2005 M12	<p>The Committee's report contained mathematical discrepancies totaling \$5,162.35, as detailed below:</p> <ul style="list-style-type: none"> • The Committee's beginning cash balance, \$90,769.49, is greater than the ending cash balance of the Committee's previous report, \$90,537.02, a discrepancy of \$232.47. • The Committee's report contained mathematical discrepancies totaling \$4,929.91.
Mathematical Discrepancies	2006 M10	The Committee's report contained mathematical discrepancies totaling \$70,000.03.
Mathematical Discrepancies	2006 12G	The Committee's report contained mathematical discrepancies totaling \$59,908.17.
Mathematical Discrepancies	2006 30G	The Committee's report contained mathematical discrepancies totaling \$56,500.08.
Federal Election Activity/Levin Funds	2005 M4	The Committee disclosed disbursements totaling \$25,548.50; however, the report failed to disclose payments for salary or wages as Federal Election Activity on Schedule B for Line 30(b) of the Detailed Summary Page.

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Federal Election Activity/Levin Funds	2006 M6	On Schedule B, the Committee disclosed \$6,000.00 in disbursements made for "FEA 100% Federal: Slate Card mailer," but failed to clarify whether the activity met the definition of Federal Election Activity and if the activity met the conditions of exempt party activity.
Federal Election Activity/Levin Funds	2006 30G	<p>On Schedule B, the Committee disclosed \$24,660.07 in disbursements made for "Reimbursement for office & postage," "Reimbursement for Printing & Postage," "FEA 100% Federal: Printing," "FEA 100% Federal: Postage" and "Phone bankers & walkers," 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>Schedule B, Line 30(b), disclosed \$17,531.05 in MEMO entries for apparent reimbursements to a consulting firm; however, there were only \$16,762.90 in payments reflected on Schedule B, a \$768.15 discrepancy.</p>
Allocated Federal and Non-Federal Activity	2005 M12	Schedule H4 disclosed an event year-to-date total for Administrative expenses of \$4,219.96; however, FEC calculations disclose this total to be \$12,514.85, resulting in a discrepancy of \$8,294.89.
Allocated Federal and Non-Federal Activity	2006 12G	<p>On Schedule H4, the Committee failed to provide the purpose for \$12,696.60 in disbursements disclosed.</p> <p>The Committee failed to provide an adequate purpose for a disbursement to one (1) vendor totaling \$123.44.</p> <p>Schedule H4 of the Committee's report disclosed memo entries totaling \$1,532.62 that did not appear to correspond with any itemized transaction(s).</p>
Allocated Federal and Non-Federal Activity	2006 30G	Schedule H4 disclosed \$14,938.15 in reimbursements to a consulting firm for administrative expenses; however, there were only \$4,938.15 in MEMO entries disclosing the original vendors for these payments, a \$10,000.00 discrepancy.

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