

REPORTS ANALYSIS REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: January 6, 2009

ANALYST: Kristin DeCarmin

I. COMMITTEE: Maryland Republican State Central Committee  
C00120055  
Robert Christopher Rosenthal, Treasurer (4/27/06 - present)  
Steven Wiseman, Treasurer (3/17/04 - 4/26/06)  
15 West Street  
Annapolis, MD 21401

TYPE OF COMMITTEE Party

II. REGISTRATION: February 1, 1980

III. BACKGROUND:

The Committee was sent twenty eight (28) Requests for Additional Information (RFAs) and failed to adequately respond or responded late to thirteen (13) of these requests which included 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 to political committees, failure to properly itemize disbursements, Federal Election Activity/Levin funds and allocated federal and non-federal activity.

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VIOLATION DESCRIPTION	REPORT(S)	DETAILS OF VIOLATION
Mathematical Discrepancies	Amended 2006 12G, received 3/23/07	Schedule A of the Committee's report disclosed memo entries totaling \$12,400 that did not appear to correspond with any itemized transaction(s).
Failure to Provide Supporting Schedules	2006 M7	Schedule B of the Committee's report disclosed disbursements "To correct charge error" totaling \$15,000.00; however, the Committee failed to clarify the prior disclosure of the receipt related to this activity.
Failure to Properly Itemize Contributions from Individuals	2005 M12	The Committee failed to provide the adequate identification for 14 of 58 contributions from individuals that require itemization.
Failure to Properly Itemize Contributions and Transfers to Political Committees	2006 M6	The Committee failed to clarify the ultimate recipient for two (2) disbursements to a bank for "To correct ADP Mistake (Salaries)" and "To correct ADP Mistake (Payroll Taxes)" totaling \$35,125.08.
Failure to Properly Itemize Disbursements	2006 M5	On Schedule B, the Committee disclosed a \$24,841.95 disbursement made for "Bumper Stickers, Signs, Etc." and clarified the activity met the conditions of exempt party activity; however, they failed to clarify whether the transfers-in on Schedule A from a national party committee were used for this disbursement.
Failure to Properly Itemize Disbursements	2006 M6	The Committee failed to provide an adequate purpose for a disbursement to one (1) vendor totaling \$25,015.57.
Federal Election Activity/Levin Funds	2005 M4	The Committee disclosed disbursements totaling \$72,612.17; however, reports for the 3 month period failed to disclose payments for salary or wages as Federal Election Activity on Schedule B for Line 30(b) of the Detailed Summary Page.
Federal Election Activity/Levin Funds	2005 M7	The Committee disclosed disbursements totaling \$84,936.27; however, reports for the 3 month period failed to disclose payments for salary or wages as Federal Election Activity on Schedule B for Line 30(b) of the Detailed Summary Page.
Federal Election Activity/Levin Funds	2006 M7	<p>The Committee failed to provide an adequate purpose for disbursements to two (2) vendors totaling \$6,049.10.</p> <p>The Committee failed to provide an adequate name and address of the original vendor for non-travel reimbursements to individuals for two (2) of the disbursements requiring itemization.</p>
Federal Election Activity/Levin Funds	Amended 2006 M8, received 9/29/06	<p>The Committee failed to provide an adequate purpose for disbursement to two (2) vendors totaling \$20,182.66.</p> <p>The Committee failed to provide an adequate name and address of the original vendor for travel and non-travel reimbursements to individuals for eleven (11) of the</p>

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		disbursements requiring itemization.
Federal Election Activity/Levin Funds	Amended 2006 M10, received 11/16/06	<p>The Committee failed to provide an adequate purpose for disbursements to two (2) vendors totaling \$1,916.47.</p> <p>The Committee disclosed \$52,856.88 in disbursements made for "Facility &amp; Catering" and "invitations-first lady lunch" on Schedule B, but failed to clarify whether these disbursements were made on behalf of specifically identified federal candidates.</p> <p>On Schedule B, the Committee disclosed \$229.40 in disbursements made for "Printing" and "Phone Banks" but failed to clarify whether these disbursements were Federal Election Activity 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>The Committee failed to provide an adequate name and address of the original vendor for travel and non-travel reimbursements to individuals for twenty-five (25) of the disbursements requiring itemization.</p>
Federal Election Activity/Levin Funds	Amended 2006 12G, received 1/9/07	<p>The Committee failed to provide an adequate name and address of the original vendor for travel and non-travel reimbursements to individuals for eight (8) of the disbursements requiring itemization.</p> <p>The Committee failed to provide the name and address of the original vendors for credit card payments to one (1) vendor.</p>
Federal Election Activity/Levin Funds	Amended 2006 12G, received 3/23/07	<p>On Schedule B, the Committee disclosed \$155,976.94 in disbursements made for "absentee ballot request 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.</p>
Federal Election Activity/Levin Funds	Amended 2006 30G, received 3/23/07	<p>The Committee failed to provide an adequate name and address of the original vendor for travel and non-travel reimbursements to individuals for twenty-two (22) of the disbursements requiring itemization.</p>
Allocated Federal and Non-Federal Activity	2005 M4	<p>On Schedule H3, the Committee failed to clarify the name of account for \$8,197.51 in transfers received from an apparent non-federal account for activity allocated between its federal and non-federal accounts.</p> <p>The Committee disclosed disbursements totaling \$72,612.17; however, the reports for the 3 month period disclosed limited payments for administrative expenses.</p> <p>The Committee failed to provide the name and address of the</p>

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		original vendors for credit card payments to one (1) vendor.
Allocated Federal and Non-Federal Activity	2005 M7	The Committee disclosed disbursements totaling \$84,936.27; however, the reports for the 3 month period disclosed limited payments for administrative expenses.
Allocated Federal and Non-Federal Activity	2006 M3	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 \$14,855.55.
Allocated Federal and Non-Federal Activity	Amended 2006 M6, received 7/18/06	On Schedule H3, the Committee failed to clarify the name of account for \$20,913.12 in transfers received from an apparent non-federal account for activity allocated between its federal and non-federal accounts.
Allocated Federal and Non-Federal Activity	2006 M7	The Committee failed to clarify transfers made to an apparent non-federal account disclosed on Schedule B totaling \$35,253.94.

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