

REPORTS ANALYSIS REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: October 14, 2009

ANALYST: Nicole Della Rocco

I. COMMITTEE: Democratic State Committee (Delaware)  
C00211763  
Helene Keeley, Treasurer (5/26/09 - present)  
Patricia Blevins, Treasurer (7/10/01 - 5/25/09)  
P.O. Box 2065  
Wilmington, DE 19899

TYPE OF COMMITTEE: Party

II. REGISTRATION: January 8, 1987

III. BACKGROUND:

The Committee was sent nineteen (19) Requests for Additional Information (RFAs) for reporting errors including excessive and prohibited contributions and other impermissible contributions and transfers, mathematical discrepancies, Federal Election Activity/Levin funds, and allocated federal and non-federal activity.

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VIOLATION DESCRIPTION	REPORT(S)	DETAILS OF VIOLATION
Excessive, Prohibited and Other Impermissible Contributions and Transfers	M10 2008	<ul style="list-style-type: none"> <li>• Schedule A of the Committee's report disclosed the receipt of a deposit apparently made in error from a prohibited source (a corporation) totaling \$10,000.00.</li> <li>• Schedule A of the Committee's report disclosed receipts for "Voter File" and "Postage" from two (2) unregistered sources without clarifying whether the usual and normal charge was assessed for the services provided. The apparent impermissible receipts totaled \$781.02.</li> </ul>
Excessive, Prohibited and Other Impermissible Contributions and Transfers	12G 2008	Schedule A of the Committee's report disclosed the receipt of a deposit apparently made in error totaling \$15,000.00 from two (2) individuals.
Mathematical Discrepancies	M8 2008	The Committee's report contained mathematical discrepancies totaling \$24,845.94.
Federal Election Activity/Levin Funds	YE 2007	<p>The Committee's report contained mathematical discrepancies on Schedule L totaling \$32,622.67, as detailed below:</p> <ul style="list-style-type: none"> <li>• The Committee's report contained Column B discrepancies totaling \$20,360.00.</li> <li>• The Committee's report disclosed a negative ending cash-on-hand balance of \$12,262.67 on Line 11, Column A of Schedule L of the Aggregation Page: Levin Funds.</li> </ul>
Federal Election Activity/Levin Funds	M8 2008	<p>The Committee's report contained mathematical discrepancies on Schedule L totaling \$110,938.00.</p> <ul style="list-style-type: none"> <li>• The Committee's report contained Column B discrepancies totaling \$8,280.00.</li> <li>• On Schedule L, the Committee's beginning cash balance for the "NonFederal" account, negative \$16,487.67, is less than the ending cash balance disclosed for this account on the Committee's previous report, negative \$11,487.67, a discrepancy of \$5,000.00.</li> <li>• Line 11, Column A of the Schedule L Aggregation Page, negative \$16,487.67, did not equal Line 11, Column B of the Schedule L Aggregation Page, \$81,170.33, a discrepancy of \$97,658.00.</li> </ul>
Federal Election Activity/Levin Funds	M10 2008	<p>The Committee's report contained mathematical discrepancies on Schedule L totaling \$121,205.67, as detailed below:</p> <ul style="list-style-type: none"> <li>• The Committee's report contained Column B discrepancies totaling \$12,200.00.</li> <li>• On Schedule L, the Committee's beginning cash balance for the "NonFederal" account, negative \$16,487, was less than</li> </ul>

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Democratic State Committee (Delaware)

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		<p>the ending cash balance disclosed for this account on the Committee's previous report, negative \$14,987.67, a discrepancy of \$1,500.00.</p> <ul style="list-style-type: none"> <li>Line 11, Column A of the Schedule L Aggregation Page, negative \$11,397.67, did not equal Line 11, Column B of the Schedule L Aggregation Page, \$84,710.33, a discrepancy of \$96,108.00.</li> <li>The Committee's report disclosed a negative ending cash-on-hand balance of \$11,397.67 on Line 11, Column A of Schedule L of the Aggregation Page: Levin Funds.</li> </ul>
Federal Election Activity/Levin Funds	12G 2008	<p>The Committee's report contained mathematical discrepancies on Schedule L totaling \$106,288.00.</p> <ul style="list-style-type: none"> <li>On Schedule L, the Committee's beginning cash balance for the "NonFederal" account, negative \$16,487.67, is less than the ending cash balance disclosed for this account on the Committee's previous report, negative \$11,397.67, a discrepancy of \$5,090.00.</li> <li>Line 11, Column A, \$21,002.33, of the Schedule L Aggregation Page did not equal Line 11, Column B, \$122,200.33, of the Schedule L Aggregation Page, a discrepancy of \$101,198.00.</li> </ul>
Allocated Federal and Non-Federal Activity	M10 2008	<ul style="list-style-type: none"> <li>The Committee failed to clarify transfers made to an apparent non-federal account disclosed on Schedule B totaling \$10,000.00.</li> <li>On Schedule H3, the Committee disclosed transfers-in from the non-federal account which may exceed the non-federal share of allocable administrative/voter drive expenditures by as much as \$8,154.66.</li> </ul>
Allocated Federal and Non-Federal Activity	12G 2008	<p>The Committee failed to clarify transfers made to an apparent non-federal account disclosed on Schedule B totaling \$15,000.00.</p>
Allocated Federal and Non-Federal Activity	30G 2008	<p>On Schedule H2, the Committee disclosed the ratio as being the same as previously reported for one (1) fundraising event; however, this event was not previously reported.</p>