

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: November 7, 2011

ANALYST: Quy Vuong

I. COMMITTEE: Minnesota Democratic-Farmer-Labor Party  
C00025254  
Thomas Hamilton, Treasurer (2/9/11 – present)  
Lori Sellner, Treasurer (2/18/09 – 2/8/11)  
William Davis, Treasurer (9/15/06 – 2/17/09)  
255 Plato Blvd E.  
St. Paul, MN 55107

TYPE OF COMMITTEE: Party

II. REGISTRATION: November 17, 1975

III. BACKGROUND:

The Committee was sent twenty-five (25) Requests for Additional Information ("RFAI") for reporting errors including excessive, prohibited and other impermissible contributions or transfers, failure to provide supporting schedules, and allocated federal and non-federal activity.

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DESCRIPTION	REPORT(S)	DESCRIPTION OF VIOLATION
Excessive, Prohibited Contributions and Other Impermissible Contributions and Transfers	2009 M5	Schedule A of the Committee's report disclosed receipts for "Payroll" and "Email Charge" from a federal candidate without clarifying whether the usual and normal charge was assessed for the services provided. The apparent impermissible receipt totals \$9,165.91 or 52.5% of the total offsets to operating expenditures (Line 15, Column A, of the Detailed Summary Page).
Excessive, Prohibited Contributions and Other Impermissible Contributions and Transfers	2009 Amended M6, received 8/3/09	Schedule A of the Committee's report disclosed receipts for "Payroll Service" and "Payroll Services" from a federal candidate without clarifying whether the usual and normal charge was assessed for the services provided. The apparent impermissible receipts total \$8,804 or 74.2% of the total offsets to operating expenditures (Line 15, Column A, of the Detailed Summary Page).
Excessive, Prohibited Contributions and Other Impermissible Contributions and Transfers	2009 Amended M7, received 8/18/09	Schedule A of the Committee's report disclosed receipts for "Payroll Service" from a federal candidate without clarifying whether the usual and normal charge was assessed for the services provided. The apparent impermissible receipts total \$9,782.36 or 90.5% of the total offsets to operating expenditures (Line 15, Column A, of the Detailed Summary Page).
Excessive, Prohibited Contributions and Other Impermissible Contributions and Transfers	2009 M8	Schedule A of the Committee's report disclosed receipts for "Payroll Service" and "Voter File Access Fee" from a federal candidate without clarifying whether the usual and normal charge was assessed for the services provided. The apparent impermissible receipts total \$16,414.81 or 66.5% of the total offsets to operating expenditures (Line 15, Column A, of the Detailed Summary Page).
Failure to Provide Supporting Schedules	2009 Amended M2, received 8/1/09	The Committee's report disclosed additional receipts totaling \$21,932.51 and additional debts incurred totaling \$61,110.24 for the reporting period. These both constitute an increase of more than 5% and \$10,000 over the activity of the original report.
Failure to Provide Supporting Schedules	2009 Amended M3, received 8/1/09	The Committee's report disclosed additional debts incurred totaling \$13,982.27 for the reporting period. These all constitute an increase of more than 5% and \$10,000 over the activity of the original report.
Failure to Provide Supporting Schedules	2009 Amended M4, received 8/1/09	The Committee's report disclosed additional debts incurred totaling \$18,112.75 for the reporting period. This constitutes an increase of more than 5% and \$10,000 over the activity of the original report.
Failure to Provide Supporting Schedules	2009 M8	Schedule A of the Committee's report disclosed offsets to operating expenditures totaling \$6,783.65. However, the Committee failed to disclose any payments to this vendor on its disbursement schedules.

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Allocated Federal and Non-Federal Activity	2009 M3	<p>The Committee failed to clarify whether a negative transfer totaling \$18,100.86 on Schedule H3 to its non-federal account was for the non-federal share of a refund or rebate of a previously allocated expense.</p> <p>The Committee failed to provide a Schedule H2 to disclose the allocation ratio and unique identifier code for fundraising expenditures listed on Schedule H4.</p>
Allocated Federal and Non-Federal Activity	2009 M4	The Committee failed to provide a Schedule H2 to disclose the allocation ratio and unique identifier code for fundraising expenditures listed on Schedule H4.
Allocated Federal and Non-Federal Activity	2009 M5	The Committee failed to clarify whether a negative transfer totaling \$6,307.12 on Schedule H3 to its non-federal account was for the non-federal share of a refund or rebate of a previously allocated expense.
Allocated Federal and Non-Federal Activity	2009 Amended M6, received 8/3/09	The Committee failed to provide a Schedule H2 to disclose the allocation ratio and unique identifier code for fundraising expenditures listed on Schedule H4.
Allocated Federal and Non-Federal Activity	2009 Amended M7, received 8/18/09	<p>The Committee failed to provide a Schedule H2 to disclose the allocation ratio and unique identifier code for fundraising expenditures listed on Schedule H4.</p> <p>Schedule H3 disclosed \$31,490 in transfers from the non-federal account for allocable fundraising activity for a 3 month period. However, Schedule H4 disclosed \$5,625.80 as the non-federal share of fundraising disbursements, resulting in an apparent excessive transfer of approximately \$25,864.20 from the non-federal account.</p>
Allocated Federal and Non-Federal Activity	2009 Amended M9, received 10/12/09	The Committee failed to provide a Schedule H2 to disclose the allocation ratio and unique identifier code for fundraising expenditures listed on Schedule H4.
Allocated Federal and Non-Federal Activity	2010 M9	The Committee failed to provide an adequate purpose for two (2) disbursements to one (1) vendor totaling \$13,494.32.

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