

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: October 30, 2013

ANALYST: Paul Stoetzer

- I. COMMITTEE: North Carolina Republican Party
C00038505
Jeffrey A. Morse, Jr., Treasurer
(6/18/13 - Present)
H. Kenneth Dickson, Jr. Treasurer
(6/15/11 - 6/17/13)
1506 Hillsborough Street
Raleigh, NC 27605
- II. RELEVANT STATUTE: 2 U.S.C. § 434(b)(2)
11 CFR § 104.3(a)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)

The North Carolina Republican Party ("the Committee") filed an Amended 2012 30 Day Post-General Report to disclose additional receipts totaling \$172,521.14, which were not disclosed on the original 2012 30 Day Post-General Report (Attachment 2).

On December 4, 2012, the Committee filed the 2012 30 Day Post-General Report covering the period from October 18, 2012 through November 26, 2012. The original report disclosed \$167,705.06 in on Line 12 (Transfers from Affiliated/Other Party Committees) of the Detailed Summary Page (Image 12940788733, Attachment 2).

On April 30, 2013, a Request for Additional Information (RAFI) was sent to the Committee referencing the 2012 30 Day Post-General Report. Among other issues, the RAFI requested that the Committee amend its report to disclose in-kind transfers received

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totaling \$172,521.14 that were disclosed on reports filed by the Republican National Committee, but not disclosed on the Committee's report (Image 13330030212).

On May 16, 2013, Karen Langham, Accounting Director for the Committee, called the Reports Analysis Division (RAD) Analyst regarding the RFAI and requested guidance on where to find the transfers on the Republican National Committee's report. Ms. Langham said that she would get in touch with the Republican National Committee to determine where the mistake occurred. The Analyst said that the Committee should either amend their report to disclose the transfers or, if the transfers were not received by the Committee, they should file a Miscellaneous Electronic Submission ("Form 99") to explain that the transfers were not received (Attachment 3).

On May 24, 2013, the Committee filed a Form 99 in response to the RFAI. The Committee stated, in part, "The in-kind transfers from the Republican National Committee for Security Services have been disclosed on the amendment. These transfers were inadvertently omitted from the original report" (Image 13962705580).

Additionally on May 24, 2013, the Committee filed an Amended 2012 30 Day Post-General Report, which disclosed \$340,226.20 on Line 12 of the Detailed Summary Page, a total increase in receipts of \$172,521.14 from the original report (Image 13962705257, Attachment 2).

On June 24, 2013, an RFAI was sent to the Committee referencing the Amended 2012 30 Day Post-General Report, received May 24, 2013. The RFAI requested clarification regarding the substantial increase in receipts disclosed on the report that were not disclosed in the original filing (Image 13330033745).

On July 24, 2013, the Committee filed a Form 99 stating, in part:

"In reference to your letter dated June 24, 2013, the amended [2012 30 Day Post-General Report] includes three in-kind transfers from the Republican National Committee that were inadvertently omitted from the original report. The transfers disclosed on the amended report were in-kind transfers for security as follows:

10/19/12 \$84,640.75
11/16/12 \$36,412.90
11/26/12 \$51,467.49
TOTAL \$172,521.14

Item 2 of our letter dated May 24, 2013 in response to your letter dated April 30, 2013 states that the in-kind transfers from the Republican National Committee for security that were inadvertently omitted from the original report had been disclosed on the amendment" (Image 13964442757).

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On July 30, 2013, Ms. Langham called the RAD Analyst. Among other issues discussed, the Analyst explained that the increase in receipts disclosed on the Amended 2012 30 Day Post-General Report was referable for further action to the Commission. The Analyst stated that if the Committee wanted to provide further clarification on why the in-kind receipts were not originally disclosed, they could file a Form 99 to do so. Ms. Langham said that she would check with the Executive Director to find out why the documentation of the in-kind receipts did not make it to her desk in time to be included in the filing and would then file a Form 99 (Attachment 3).

On September 10, 2013, Ms. Langham called to discuss the potential referral for further action regarding the undisclosed in-kind contributions from the 2012 30 Day Post-General Report, among other items. She stated that she wished to file an additional Form 99 to provide further clarifying information, but wanted to ensure it was not too late to file a response. The Analyst told her she could file the Form 99 to be placed on the public record if she wished to do so at this time (Attachment 3).

To date, no further communications have been received from the Committee regarding this matter.

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