

REPORTS ANALYSIS REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: November 19, 2013

ANALYST: Christopher Morse

I. COMMITTEE: North Dakota Republican Party  
C00018929  
Shane Goettle, Treasurer (6/26/13 - Present)  
Robert Harms, Treasurer (7/13/09 - 6/25/13)  
1029 N. 5<sup>th</sup> St.  
Bismarck. ND 58501

TYPE OF COMMITTEE: Party

II. REGISTRATION DATE: July 10, 1976

III. MULTICANDIDATE STATUS: Qualified

IV. BACKGROUND:

The Committee was sent thirty-two (32) Requests for Additional Information (RFAs) for reporting errors including excessive, prohibited and other impermissible contributions or transfers, mathematical discrepancies, and allocated federal and non-federal activity.

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**North Dakota Republican Party (C00018929)**  
**ADRO Referral Response Guide**

**Excessive, Prohibited and Other Impermissible Contributions or Transfers**

Report	RFAI Due Date	Response Date(=)	Reason for code
2012 Amended M2, received 4/20/12	6/21/12	6/22/12	<p>The Committee disclosed prohibited receipts from unregistered committees on Line 12 totaling \$16,789.32.</p> <p>The Committee filed a Form 99 on 6/22/12 that included copies of refund checks issued outside the designated 45-day timeframe for refund of prohibited receipts.</p>
2012 Amended M3, received 4/20/12	6/21/12	6/22/12	<p>The Committee disclosed a prohibited receipt from an unregistered committee on Line 12 totaling \$2,755.00.</p> <p>The Committee filed a Form 99 on 6/22/12 that included a copy of the refund check issued outside the designated 45-day timeframe for refund of prohibited receipts.</p>
2012 Amended M10, received 1/18/13	3/29/13	4/2/13	<p>The Committee disclosed a prohibited receipt from an unregistered committee on Line 12 totaling \$10,000.00 and receipts on Lines 11(c) and 12 totaling \$74,000.00 that were not disclosed on the donor report. The Committee disclosed receipts on Line 17 totaling \$233.34 that were missing a purpose and required clarification.</p> <p>The Committee filed an Amended 2012 M10 on 4/2/13 that indicated a refund check was issued for the receipt from the unregistered committee, removed one transfer not disclosed on the donor report, corrected the donor name of the other receipt not disclosed on the donor report and provided clarifying purposes for the receipts on Line 17. The Committee also filed a Form 99 on 4/2/13 that states in part: "The \$10,000.00 from the ND Oil PAC has been refunded as it should have been deposited into our state account. I tried to attach a copy of the check, for your records but it would not paste into this document, therefore, I have photocopied it and will mail it to you. I have also disclosed this on line 28 for my April report."</p>
2012 Amended 12G, received 1/18/13	3/29/13	4/2/13	<p>The Committee disclosed receipts on Lines 11(c) and 12 totaling \$32,500.00 that were not disclosed on the donor report.</p> <p>The Committee filed a Form 99 on 4/2/13 that states in part: "Ques. #1 was in reference to contributions from other committees which had not been disclosed on their reports. I looked at the reports filed from the respective committees and found that they were disclosed, however, would like to point out the following: a. Litnite Energy Council reported on page 8 our name incorrectly. They have listed GOP-Victory Mail Account (Line 29) with our address. They should have reported our correct name as the North Dakota Republican Party. b. The National Republican Congressional Committee reported this contribution on their October Monthly Report (Page 1917, Schedule B, line 22), however we did not receive their letter until October 3rd, therefore it's listed on our 12 -Day Pre-General Report. c. Great Rivor Energy Action Team also reported theirs on their October Quarterly report, (Line 29)."</p>

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### Mathematical Discrepancies

Report	RFAI Due Date	Response Date(s)	Reason for code
2011 Amended M12, received 6/20/12	10/11/12	7/15/13	<p>The report contained mathematical discrepancies on several lines in Column B totaling \$1,060.42.</p> <p>The Committee filed an Amended 2011 M12 on 7/15/13 that corrected these discrepancies.</p>

### Allocated Federal and Non-Federal Activity

Report	RFAI Due Date	Response Date(s)	Reason for code
2011 Amended M7, received 1/30/12	4/13/12	7/12/13	<p>The Committee failed to provide a Schedule H2 to disclose the allocation ratio and unique activity or event identifier for fundraising expenditures listed on Schedule H4.</p> <p>The committee filed an Amended 2011 M7 on 7/12/13 that moves the fundraising disbursements to Schedule B supporting Lie 21(b).</p>
2011 Amended M12, received 4/19/12	6/21/12	7/15/13	<p>The report disclosed a mathematical discrepancy for the event year-to-date total for administrative expenses on Schedule H4 totaling \$10,793.50.</p> <p>The Committee filed an Amended 2011 M12 on 7/15/13 that corrected the discrepancy.</p>
Amended 2011 YE, received 1/30/12	4/20/12	7/15/13	<p>The report disclosed a mathematical discrepancy for the event year-to-date total for administrative expenses on Schedule H4 totaling \$10,793.50.</p> <p>The Committee filed an Amended 2011 YE on 7/15/13 that corrected the discrepancy.</p>
2012 M4	7/5/12	7/15/13	<p>The report disclosed a mathematical discrepancy for the event year-to-date total for administrative expenses on Schedule H4 totaling \$3,828.80.</p> <p>The Committee disclosed disbursements totaling \$136,275.09 for a 3-month period, but only disclosed limited administrative expenses</p> <p>Schedule H4 supporting line(s) 21(a)(i) and 21(a)(ii) failed to provide clarifying information or the original vendor(s) regarding reimbursements to individual(s) totaling \$973.48.</p> <p>The Committee filed an Amended 2012 M4 on 7/15/13 that corrected the event year-to-date discrepancy. The Committee did not provide clarifying vendor information for the travel reimbursements and did not clarify the limited administrative expenses.</p>
2012 Amended M6, received	10/16/12	7/16/13	<p>The report disclosed a Schedule H2 for one (1) fundraising event; however, an Schedule H4 was not filed to disclose payments for the fundraising activity.</p>

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6/21/12			<p>The report disclosed a mathematical discrepancy for the event year-to-date total for administrative expenses on Schedule H4 totaling \$3,183.46.</p> <p>The report disclosed a disbursement on Schedule H4 totaling \$1,643.31, but failed to clarify whether this disbursement was made on behalf of specifically identified federal candidates or was associated with fundraising activity.</p> <p>The Committee filed an Amended 2012 M6 on 7/16/13 that added the missing fundraising expenses on Schedule H4, corrected the math discrepancies and corrected the category code for the fundraising expenses categorized as administrative.</p>
2012 Amended M10, received 1/18/13	3/29/13	4/2/13	<p>The report disclosed disbursements for salary, wages and/or fringe benefits on Schedule H4 resulting in an apparent impermissible transfer-in of non-federal funds totaling \$6,730.39.</p> <p>The report disclosed apparent allocated GOTV expenses resulting in an impermissible transfer of non-federal funds totaling \$285.44.</p> <p>The Committee filed an Amended 2012 M10 on 4/2/13 that moved the apparent allocable salary and GOTV disbursements to Schedule B.</p>
2012 Amended 12G, received 1/18/13	3/29/13	4/2/13	<p>The report disclosed disbursements for salary, wages and/or fringe benefits, on Schedule H4, resulting in an apparent impermissible transfer-in of non-federal funds totaling \$7,666.29.</p> <p>The committee filed an Amended 2012 12G on 4/2/13 that moved the apparent allocable salary disbursements to Schedule B.</p>
2012 Amended 30G, received 1/18/13	4/9/13	7/17/13	<p>The report disclosed a Schedule H2 for one (1) fundraising event; however, a Schedule H4 was not filed to disclose payments for the fundraising activity.</p> <p>The committee filed an Amended 2012 30G on 7/17/13 to correct the Schedule H2 and Schedule H4 so the fundraising event and disbursements match</p>