

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: March 28, 2014

ANALYST: Quy Vuong

I. COMMITTEE:

Nevada State Democratic Party  
C00208991  
Jan Churchill, Treasurer (6/16/06 – Present)  
409 Horn Street  
Las Vegas, NV 89107

II. RELEVANT STATUTE:

2 U.S.C. § 434(b)(8)  
11 CFR § 104.3(d)

III. BACKGROUND:

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

The Nevada State Democratic Party (“the Committee”) amended its 2012 Year-End Report to disclose additional debts incurred during the reporting period totaling \$164,020.35, which were not disclosed in the original report (Attachment 2).

On January 31, 2013, the Committee filed the original 2012 Year-End Report covering the period from November 27, 2012 through December 31, 2012. The report disclosed \$38,017.05 on Line 10 (Debts and Obligations Owed by the Committee) of the Summary Page (Image 13960601719).

On June 18, 2013, the Committee filed an Amended 2012 Year-End Report. The report disclosed \$281,069.76 in debts on Line 10 of the Summary Page (Image 13962958171). Of that amount, \$164,020.35 were disclosed on Schedule D as newly incurred debts for the reporting period that were not disclosed in the original report (Image 13962958261-63, Attachment 2).

14L-09-001-141

On August 16, 2013, a Request for Additional Information (RAFI) was sent to the Committee referencing the Amended 2012 Year-End Report, received June 18, 2013. The RAFI requested clarification regarding the increase in newly incurred debt disclosed on the Amended 2012 Year- End Report that was not disclosed in the original filing (Image 13330036093).

On September 20, 2013, the Committee filed an Amended 2012 Year-End Report with no change in newly incurred debts from the previous amendment (Images 13941649569-71, Attachment 2). The Committee attached memo text to the report which stated, in part:

“This is in response to your letter dated 8/16/13 asking for additional information on the Amended Year-End-Report (11/27/2012 - 12/31/2012) of the Nevada State Democratic Party (the Party). You asked about increased debt shown on the above-referenced report. The Nevada State Democratic Party had an extraordinarily high volume of activity during the 2012 election cycle, with large numbers of both staff and vendors. After the election, the quick departure of many staff left the Party with an incomplete picture of the financial commitments that had been incurred on its behalf. On its post-election reports, the Party reported those commitments for which it had records, but continued to receive invoices from vendors. The Party accordingly amended its reports to account for the newly obtained information. While the debts added were few in number, they were proportionally large in amount owed. The Party has reviewed its procedures for tracking debt and will put in place procedures to better track obligations made on its behalf. If you have any additional questions, please contact the Committee” (Image 13941649483).

On December 5, 2013, the Reports Analysis Division (RAD) Analyst called Jan Churchill, the Committee Treasurer, to inform her that the Committee may be referred for additional action to the Commission for the increase in activity disclosed on the Amended 2012 Year-End Report. The Analyst explained to Ms. Churchill the purpose of the call was to give the Committee an opportunity to provide further clarification regarding the increase in activity disclosed on the report (Attachment 3).

To date, no further communication has been received from the Committee regarding this matter.

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