

**RAD REFERRAL #: A17-16**

**DATE:** July 13, 2017  
**ANALYST:** Jack Baisden

**REPORTS ANALYSIS AUDIT REFERRAL**

**I. COMMITTEE:** Nevada Republican Central Committee  
C00082925  
Michael J. Bertrand, Treasurer  
PO BOX 95125  
Las Vegas, NV 89193

**TYPE OF COMMITTEE:** Party

**II. REGISTRATION DATE:** November 23, 1977

**III. MULTICANDIDATE STATUS:** Qualified

**IV. TOTAL POINTS ASSESSED:**

**V. SUMMARY OF AUDIT POINTS BY STANDARD:**

**VI. NOTICES SENT TO AND RESPONSES RECEIVED FROM THE COMMITTEE:**

See attached O-Index for the Committee.

## VII. PROBLEMS FOR WHICH AUDIT POINTS WERE ASSESSED:

### A. Standard 6 - Mathematical Discrepancies:

Report Type	Violation (Description)
2016 M3	<p>The Committee's report contained mathematical discrepancies totaling \$5,200, as detailed below:</p> <p>The report contained mathematical discrepancies on several lines in Column B totaling \$200.00.</p> <p>The aggregate year-to-date total did not appear to accurately reflect the contributions received during the calendar year for one (1) political committee, creating a discrepancy of \$5,000.00.</p>
2016 Amended M5, received 5/26/16	<p>The Committee's report contained mathematical discrepancies totaling \$49,351.26, as detailed below:</p> <p>The beginning cash balance, \$148,231.43, was greater than the ending cash balance on the previous report, \$144,228.73, a discrepancy of \$4,002.70.</p> <p>The report contained mathematical discrepancies on several lines in Column B totaling \$15,348.56.</p> <p>Schedule A supporting Line 12 disclosed memo entries totaling \$30,000.00 that did not appear to correspond with any itemized transaction(s).</p>
2016 Amended M6, received 7/12/16	<p>The Committee's report contained mathematical discrepancies totaling \$30,200.00, as detailed below:</p> <p>The beginning cash balance, \$235,585.70, was less than the ending cash balance on the previous report, \$235,685.70, a discrepancy of \$100.00.</p> <p>The report contained mathematical discrepancies on several lines in Column B totaling \$100.00.</p> <p>Schedule A supporting Line 12 disclosed memo entries totaling \$30,000.00 that did not appear to correspond with any itemized transaction(s).</p>

2016 Amended M7, received 9/7/16 Schedule A supporting Line 12 disclosed memo entries totaling \$30,000.00 that did not appear to correspond with any itemized transaction(s).

**B. Standard 7 - Failure to Provide Supporting Schedules:**

<b>Report Type</b>	<b>Violation (Description)</b>
2016 YE	Schedule A supporting Line 12 disclosed \$197,500.00 in transfers received from a joint fundraiser during the 2016 calendar year. However, the supporting itemized memo entries provided on Schedule A during 2016 total \$135,310.98, creating a discrepancy of \$62,189.91.

**C. Standard 8 - Failure to Properly Itemize Contributions from Individuals:**

<b>Report Type</b>	<b>Violation (Description)</b>
2015 M3	Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 23 of 23 of the contributions from individuals that require itemization.
2015 M4	Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 15 of 39, or 38.5%, of the contributions from individuals that require itemization.
2016 Amended M5, received 5/26/16	Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 70 of 343, or 20.4%, of the contributions from individuals that require itemization.
2016 Amended 12G, received 12/2/16	Schedule A supporting Lines 11(a)(i) and 12 failed to disclose adequate identification for 19 of 85, or 22.4%, of the contributions from individuals that require itemization.

**D. Standard 12 – Federal Election Activity/Levin Funds:**

<b>Report Type</b>	<b>Violation (Description)</b>
2016 M3	<p>Schedule B supporting Line 30(b) disclosed \$5,407.51 in disbursements for “Advertising” and “January Ads” but failed to clarify whether these disbursements were FEA public communications that promoted, supported, attacked or opposed federal candidates or if they expressly advocated the election or defeat of clearly identified federal candidates, which would require additional disclosure.</p> <p>Schedule B supporting Line 30(b) failed to provide clarifying information or the original vendor regarding reimbursements to individuals in the amount of \$6,828.09.</p> <p>Schedule B supporting Line 30(b) failed to disclose an adequate purpose of disbursement to eight (8) vendors totaling \$2,935.67.</p>
2016 M4	<p>Schedule B supporting Line 30(b) disclosed \$55,259.99 in disbursements for “February Ads,” “Printing,” and “Printing &amp; Postage” but failed to clarify whether these disbursements were FEA public communications that promoted, supported, attacked or opposed federal candidates or if they expressly advocated the election or defeat of clearly identified federal candidates, which would require additional disclosure.</p> <p>Schedule B supporting Line 30(b) failed to disclose an adequate purpose of disbursement to four (4) vendors totaling \$12,348.46.</p>
2016 Amended M5, received 5/26/16	<p>Schedule B supporting Line 30(b) failed to provide clarifying information or the original vendor regarding reimbursements to individuals in the amount of \$25,706.06.</p> <p>Schedule B supporting Line 30(b) failed to disclose an adequate purpose of disbursement to twenty (20) vendors totaling \$6,211.86.</p>

2016	Amended M6, received 7/12/16	Schedule B supporting Line 30(b) failed to provide clarifying information or the original vendor regarding reimbursements to individuals in the amount of \$6,116.58.  Schedule B supporting Line 30(b) failed to disclose an adequate purpose of disbursement to eleven (11) vendors totaling \$2,850.97.
2016	Amended M7, received 9/7/16	Schedule B supporting Line 30(b) failed to provide clarifying information or the original vendor regarding reimbursements to individuals in the amount of \$5,958.60.  Schedule B supporting Line 30(b) failed to disclose an adequate purpose of disbursement to eight (8) vendors totaling \$1,595.12.

#### **E. Standard 13 - Allocated Federal and Non-Federal Activity:**

<b>Report Type</b>	<b>Violation (Description)</b>
2016 Amended M6, received 07/12/16	Schedule H4 failed to disclose an adequate purpose of disbursement to two (2) vendors totaling \$4,330.00.
	Schedule H4 failed to provide clarifying information or the original vendor(s) regarding reimbursements to individuals totaling \$7,421.35

#### **VIII. MATTERS REQUIRING REFERRAL TO OGC/ADRO:**

##### **A. OGC –**

None.

**B. ADRO –**

None.

**IX. OTHER COMMISSION ACTIONS DURING THE 2013-2014 AND 2015-2016 ELECTION CYCLES**

None.

**X. OTHER RELEVANT INFORMATION:**

None.

Treasurer Name: BERTRAND, MICHAEL J Address: PO BOX 95125, LAS VEGAS, NV 89193

Cmte. Type: Y (QUALIFIED PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: MONTHLY FILER

O-Index (2015-2016)

Cmte. ID: C00082925 Cmte. Name: NEVADA REPUBLICAN CENTRAL COMMITTEE  
 Treasurer Name: BERTRAND, MICHAEL J Address: PO BOX 95125, LAS VEGAS, NV 89193  
 Cmte. Type: Y (QUALIFIED PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: MONTHLY FILER

2/18/2016	1	201602189008485732
5/26/2016	1	201605269017298954
7/12/2016	1	201607129020405942
8/20/2016	1	201608209022650650
8/28/2016	1	201608289023756192
9/7/2016	1	201609079030749801
9/29/2016	1	201609299032147101
10/7/2016	1	201610279034649840
10/27/2016	1	201610279034651128
10/30/2016	1	201610309037010049
12/1/2016	1	201612019037593710
12/2/2016	1	201612029037603948
8/25/2016	2	201608250300057632
11/2/2015	3	201511020300006528
11/2/2015	3	201511020300006531
9/7/2016	2	201609079030058098
9/19/2016	3	201609190300058717
9/28/2016	2	201609280300062679
2/1/2017	4	201702010300076680
2/1/2017	3	201702010300076643
2/1/2017	2	201702010300076655
3/16/2017	2	201703160300082674
3/23/2017	3	201703230300083027
3/23/2017	7	201703230300083030
3/23/2017	6	201703230300083037
4/11/2017	2	201704110300084123
6/6/2017	2	201706060300087046
4/11/2017	3	201704110300084125
2/11/2015	16	15970263720
3/8/2015	22	15950847208
4/6/2015	23	15951111407
5/7/2015	28	15951365041
6/5/2015	10	15951454093
7/6/2015	20	201507069000058509
8/10/2015	22	201508109000811077
8/11/2015	23	201508119000814560
9/15/2015	36	201509159002672664
11/16/2015	38	201511169003350567
10/8/2015	26	201510089002822696
11/16/2015	26	201511169003350607
11/17/2015	40	201511179003363765
12/16/2015	41	201512169004246440
1/28/2016	39	201601289004693799
9/29/2016	61	201609299032147040
2/11/2016	38	201602119008455179
2/18/2016	40	201602189008485590
10/27/2016	49	201610279034649250

O-Index (2013-2014)

Cmte. ID: C00082925 Cmte. Name: NEVADA REPUBLICAN CENTRAL COMMITTEE  
 Treasurer Name: BERTRAND, MICHAEL J Address: PO BOX 95125, LAS VEGAS, NV 89193  
 Cmte. Type: Y (QUALIFIED PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: MONTHLY FILER



6/3/2014	23	14941281692	5/1/2014	5/31/2014	\$10,360	\$42,744	\$14,500	\$38,604	\$0
7/2/2014	23	14941723504	5/1/2014	5/31/2014	\$13,282	\$42,744	\$14,500	\$41,526	\$0
7/3/2014	23	14941723745	5/1/2014	5/31/2014	\$10,360	\$42,744	\$14,500	\$38,604	\$0
7/3/2014	17	14961494606	6/1/2014	6/30/2014	\$38,604	\$12,146	\$13,650	\$37,100	-
8/8/2014	18	14970000089	6/1/2014	6/30/2014	\$38,604	\$12,146	\$13,650	\$37,100	-
8/11/2014	15	14950005172	7/1/2014	7/31/2014	\$37,100	\$12,213	\$7,344	\$41,969	-
9/9/2014	17	14970727553	8/1/2014	8/31/2014	\$37,100	\$1,023	\$9,782	\$28,341	-
9/9/2014	17	14970747570	8/1/2014	8/31/2014	\$41,969	\$1,023	\$9,782	\$33,209	-
10/6/2014	18	14978067244	9/1/2014	9/30/2014	\$33,209	\$4,134	\$14,121	\$23,223	-
10/13/2014	22	14978177085	9/1/2014	9/30/2014	\$33,209	\$28,549	\$14,121	\$47,638	\$15,671
10/21/2014	12	14951874467	10/1/2014	10/15/2014	\$47,638	\$2,039	\$17,591	\$32,086	\$0
11/15/2014	12	14952589128	10/1/2014	10/15/2014	\$47,638	\$2,014	\$17,591	\$32,061	\$0
11/26/2014	21	14952623009	10/16/2014	11/24/2014	\$32,061	\$2,714	\$11,726	\$23,048	-
1/8/2015	17	15950011949	11/25/2014	12/31/2014	\$23,048	\$466	\$10,337	\$13,177	-
2/25/2014	4	14960481517			-	-	-	-	-
2/21/2013	4	13940137360			\$379,955	\$421,339			

**Response Codes, Due Dates, and Receipt Dates for  
Nevada Republican Central Committee  
(C00082925)**

**Standard 6**

Report	Response Code	Description	Due Date	Response Date
2016 M3	LAR	Column B Totals Incorrect (U6-7)	10/24/16	10/27/16
	LIR	Aggregation Problem on Schedule A (U6-22)		
2016 Amended M5, received 5/26/16	LAR	Cash Discrepancy (U6-11)	3/08/17	3/22/17
		Column B Totals Incorrect (U6-7)		
		Memo Entries Do Not Correspond with any Transaction (U6-31)		
2016 Amended M6, received 7/12/16	LAR	Cash Discrepancy (U6-11)	3/08/17	3/22/17
		Column B Totals Incorrect (U6-7)		
		Memo Entries Do Not Correspond with any Transaction (U6-31)		
2016 Amended M7, received 9/7/16	LAR	Memo Entries Do Not Correspond with any Transaction (U6-31)	3/08/17	3/24/17

**Standard 7**

Report	Response Code	Description	Due Date	Response Date
2016 YE	IR	Insufficient Memo Schedules for Joint Fundraising (U7-31)	5/16/17	5/12/17

**Standard 8**

Report	Response Code	Description	Due Date	Response Date
2015 M3	IR	Inadequate Employer/Occupation (U8-2)	12/07/15	11/12/15
2015 M4	IR	Inadequate Employer/Occupation (U8-2)	12/07/15	11/12/15
2016 Amended M5, received 5/26/16	LAR	Inadequate Employer/Occupation (U8-2)	3/08/17	3/22/17
2016 Amended 12G, received 12/2/16	IR	Inadequate Employer/Occupation (U8-2)	4/27/17	4/26/17

**Standard 12**

Report	Response Code	Description	Due Date	Response Date
2016 M3	LAR	No Candidate Identification Provided for Public Communication Cost (30b) (U12-56)	10/24/16	10/27/16
		Reimbursements to Individuals with Non-Travel Purposes (30b) (U12-84)		
		Inadequate Purpose (B, H6 and/or L-B for Line 5) (U12-23)		
2016 M4	LAR	No Candidate Identification Provided for Public Communication Cost (30b) (U12-56)	11/02/16	12/01/16
		Inadequate Purpose (B, H6 and/or L-B for Line 5) (U12-23)		

2016 Amended M5, received 5/26/16	LAR	Reimbursements to Individuals with Non-Travel Purposes (30b) (U12-84)	3/08/17	3/22/17
		Inadequate Purpose (B, H6 and/or L-B for Line 5) (U12-23)		
2016 Amended M6, received 7/12/16	LAR	Reimbursements to Individuals with Non-Travel Purposes (30b) (U12-84)	3/08/17	3/22/17
		Inadequate Purpose (B, H6 and/or L-B for Line 5) (U12-23)		
2016 Amended M7, received 9/7/16	LAR	Reimbursements to Individuals with Non-Travel Purposes (30b) (U12-84)	3/08/17	3/24/17
		Inadequate Purpose (B, H6 and/or L-B for Line 5) (U12-23)		

### Standard 13

Report	Response Code	Description	Due Date	Response Date
2016 Amended M6, received 7/12/16	LAR	Inadequate Purpose (Schedules B and/or H4) (U13-57)	3/08/07	3/22/17
		Reimbursements to Individuals with Non-Travel Purposes (H4) (U13-108)		

**NEVADA REPUBLICAN CENTRAL COMMITTEE  
(C00082925)**

**1. List of Affiliated Committees:**

None.

**2. List of Pseudonyms:**

None.

**3. Coordinated Expenditure Report:**

None.

**4. List of 24/48-Hour Reports Filed:**

None.