

RAD REFERRAL #: A15-09

DATE: July 15, 2015

ANALYST: Paul Stoetzer

REPORTS ANALYSIS AUDIT REFERRAL

I. COMMITTEE: Democratic Party of South Carolina
C00007658
Kendra Dove (6/26/15 - Present)
Allison B. Bullard, Treasurer (2/19/13 - 6/25/15)
Dan D'Alberto, Treasurer (6/17/11 - 2/18/13)
P. O. Box 5965
Columbia, SC 29250

TYPE OF COMMITTEE: Party

II. REGISTRATION DATE: July 10, 1976

III. MULTICANDIDATE STATUS: Qualified

IV. TOTAL POINTS ASSESSED:

V. SUMMARY OF AUDIT POINTS BY STANDARD:

Standard	#	Description
Standard	5	Excessive, Prohibited and Other Impermissible Contributions and Transfers
Standard	6	Mathematical Discrepancies
Standard	7	Failure to Provide Supporting Schedules
Standard	8	Failure to Properly Itemize Contributions from Individuals
Standard	10	Failure to Properly Itemize Contributions and Transfers to Political Committees
Standard	11	Failure to Properly Itemize Disbursements
Standard	12	Federal Election Activity/Levin Funds
Standard	13	Allocated Federal and Non-Federal Activity
Standard	15	Coordinated Expenditure Reporting Problems
		TOTAL

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 5 – Excessive, Prohibited and Other Impermissible Contributions and Transfers:

Report Type	Violation (Description)
2013 M4	Schedule A supporting Line 11(a)(i) disclosed the receipt of an excessive contribution totaling \$2,647.40, or 5.4% of the Committee's total contributions from individuals. This contribution was received from one (1) individual.
2013 M5	Schedule A supporting Line 11(a)(i) disclosed the receipt of a prohibited contribution totaling \$5,000.00, or 4.4% of the total contributions from individuals. This contribution was received from one (1) corporation.

B. Standard 6 - Mathematical Discrepancies:

Report Type	Violation (Description)
2014 YE	<p>The Committee's report contained mathematical discrepancies totaling \$164,450.54, as detailed below:</p> <p>The beginning cash balance, \$32,807.00, was greater than the ending cash balance on the previous report, \$32,651.42, a discrepancy of \$155.58.</p> <p>The report contained mathematical discrepancies on several lines in Column B totaling \$164,294.96.</p>

C. Standard 7 - Failure to Provide Supporting Schedules:

Report Type	Violation (Description)
2013 M2	Schedule A supporting Line 15 disclosed offsets to operating expenditures totaling \$3,750.00. However, the Committee failed to disclose any payments to these vendors.
2013 M4	Schedule A supporting Line 15 disclosed offsets to operating expenditures totaling \$23,050.66. However, the Committee failed to disclose any payments to these vendors.

2014	M7	Schedule A supporting Line 15 disclosed offsets to operating expenditures totaling \$36,014.35. However, the Committee failed to disclose any payments to these vendors.
2014	M8	Schedule A supporting Line 15 disclosed offsets to operating expenditures totaling \$20,611.10. However, the Committee failed to disclose any payments to these vendors.
2014	M9	Schedule A supporting Line 15 disclosed offsets to operating expenditures totaling \$36,095.13. However, the Committee failed to disclose any payments to these vendors.

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

Report Type		Violation (Description)
2013	M4	Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 37 of 54, or 68.5%, of the contributions from individuals that require itemization.

E. Standard 10 - Failure to Properly Itemize Contributions and Transfers to Political Committees:

Report Type		Violation (Description)
2014	30G	Schedule B supporting Line 22 failed to disclose the address for a transfer to one (1) political committee totaling \$30,000.00.

F. Standard 11 - Failure to Properly Itemize Disbursements:

Report Type		Violation (Description)
2013	M5	Schedule B supporting Line 30(b) disclosed \$110,270.54 in disbursements for "Volunteer Exempt Mail" and "Volunteer Exempt Mailing", which were paid to an apparent direct mail firm. However, the Committee failed to clarify whether the activities met the conditions of exempt party activity.

2013 M6 Schedule A supporting Line 12 disclosed a transfer-in from a national party committee; however, Schedule B supporting Line 30(b) disclosed payments for exempt party activities totaling \$98,684.38. The transferred funds may have specifically funded the exempt activities.

G. Standard 12 – Federal Election Activity/Levin Funds:

Report Type	Violation (Description)
2013 M5	Schedule B supporting Lines 21(b) and 30(b) failed to disclose the address for twenty (20) disbursements totaling \$126,825.57.
2013 M6	Schedule B supporting Lines 21(b) and 30(b) failed to disclose the address for thirty-nine (39) disbursements totaling \$118,857.45.

H. Standard 13 - Allocated Federal and Non-Federal Activity:

Report Type	Violation (Description)
2013 M4	Schedules H4 and B supporting Lines 21(a) and 21(b) failed to disclose the mailing address for \$10,339.48 in disbursements.
2013 M7	Schedules H4 and B supporting Lines 21(a) and 21(b) failed to disclose the mailing address for \$8,542.82 in disbursements.
2013 M10	Line 18(a) of the Detailed Summary Page disclosed \$134,902.82 in transfers from the non-federal account for allocable administrative activity for a 3-month period. However, Line 21(a)(ii) disclosed \$120,178.80 in the non-federal share of allocable administrative disbursements, resulting in an apparent excessive transfer of approximately \$14,724.02 from the non-federal account.
2014 M8	Schedule A supporting Line 12 disclosed a transfer-in from a national party committee; however, Schedule H4 disclosed payments for exempt party activities, totaling \$23,000.00. The transferred funds may have specifically funded the exempt activities. Schedule H4 supporting Line 21(a) failed to disclose the mailing address for \$55.78 in disbursements.
2014 30G	Schedule H4 disclosed disbursements for salary, wages and/or fringe benefits, resulting

in an apparent impermissible transfer-in from the non-federal account of \$38,842.00.

2014 YE Line 18(a) of the Detailed Summary Page disclosed \$301,665.83 in transfers from the non-federal account for allocable administrative activity for a 3-month period. However, Line 21(a)(ii) disclosed \$132,058.34 in the non-federal share of allocable administrative disbursements, resulting in an apparent excessive transfer of approximately \$169,607.49 from the non-federal account.

Schedule H4 disclosed an event year-to-date total for administrative expenses of \$1,118,619.81; however, FEC calculations disclose this total to be \$1,037,567.92, resulting in a discrepancy of \$81,051.89.

Schedule H4 failed to disclose the mailing address for \$588.05 in disbursements.

Schedule H4 disclosed voided or returned checks totaling \$5,675.44. However, the Committee failed to clarify if the check had been reissued or what steps were taken to avoid the acceptance of a prohibited in-kind contribution.

I. Standard 15 - Coordinated Expenditure Reporting Problems:

Report Type	Violation (Description)
2013 M6	Schedule F failed to clarify two (2) coordinated expenditures totaling \$19,217.80, which were made after the date of the election.

VIII. MATTERS REQUIRING REFERRAL TO OGC/ADRO:

A. OGC –

Allocated Federal and Non-Federal Activity (Standard 13)

The Committee can be referred to the Office of General Counsel (OGC) for receiving apparent excessive transfers from the non-federal account totaling \$169,607.49 on the 2014 12 Day Pre-General, 30 Day Post-General, and Year-End Reports.

B. ADRO –

None.

**IX. OTHER COMMISSION ACTIONS DURING THE 2011-2012 AND 2013-2014
ELECTION CYCLES**

(ADRO #667): The Committee was referred to the Alternative Dispute Resolution Office (ADRO) on November 19, 2013 for cumulative errors during the 2011-2012 election cycle (closed).

X. OTHER RELEVANT INFORMATION:

The Committee was audited for the 2009-2010 election cycle (A11-19). The audit case was closed on March 18, 2014.

O-Index (2013-2014)

Cmte. ID: C00007658 Cmte. Name: DEMOCRATIC PARTY OF SOUTH CAROLINA

Treasurer Name: DOVE, KENDRA Address: PO BOX 5965, COLUMBIA, SC 29250

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

Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T			3/26/2013	1	13961223917				-	-	-	-	-	-	-
MS-T			9/25/2013	1	13941663498				-	-	-	-	-	-	-
MS-T			2/21/2014	1	14940533632				-	-	-	-	-	-	-
MS-T			2/21/2014	1	14960479832				-	-	-	-	-	-	-
MS-T			5/21/2014	1	14941248987				-	-	-	-	-	-	-
MS-T			12/19/2014	1	14953216175				-	-	-	-	-	-	-
MS-T			12/19/2014	1	14983685032				-	-	-	-	-	-	-
RQ2	M2	N	7/22/2013	2	13330034609	1/1/2013	1/31/2013	7/22/2013	-	-	-	-	-	-	-
RQ2	M4	N	7/22/2013	5	13330034611	3/1/2013	3/31/2013	7/22/2013	-	-	-	-	-	-	-
RQ2	M5	N	7/22/2013	5	13330034616	4/1/2013	4/30/2013	7/22/2013	-	-	-	-	-	-	-
RQ2	M6	N	7/30/2013	3	13330034768	5/1/2013	5/31/2013	7/30/2013	-	-	-	-	-	-	-
RQ2	M7	N	7/28/2013	2	13330034754	6/1/2013	6/30/2013	7/28/2013	-	-	-	-	-	-	-
RQ2	M10	N	1/9/2014	2	14330041959	9/1/2013	9/30/2013	1/9/2014	-	-	-	-	-	-	-
RQ2	YE	N	4/17/2014	2	14330048629	12/1/2013	12/31/2013	4/17/2014	-	-	-	-	-	-	-
RQ2	M6	N	7/30/2014	2	14330055550	5/1/2014	5/31/2014	7/30/2014	-	-	-	-	-	-	-
RQ2	M7	N	8/17/2014	2	14330059556	6/1/2014	6/30/2014	8/17/2014	-	-	-	-	-	-	-
RQ2	M8	N	10/19/2014	2	14330062631	7/1/2014	7/31/2014	10/19/2014	-	-	-	-	-	-	-
RQ2	M9	N	11/6/2014	2	14330085913	8/1/2014	8/31/2014	11/6/2014	-	-	-	-	-	-	-
RQ2	30G	N	3/10/2015	2	15330078275	10/16/2014	11/24/2014	3/10/2015	-	-	-	-	-	-	-
RQ2	YE	N	3/10/2015	3	15330078277	11/25/2014	12/31/2014	3/10/2015	-	-	-	-	-	-	-
F3XN	M2	N	2/20/2013	28	13961068851	1/1/2013	1/31/2013		\$49,137	\$50,944	\$35,776	\$64,305	-	-	\$0
F3XN	M3	N	3/20/2013	25	13961197064	2/1/2013	2/28/2013		\$64,305	\$19,806	\$49,341	\$34,770	-	-	\$0
F3XN	M4	N	4/20/2013	52	13940609993	3/1/2013	3/31/2013		\$34,770	\$83,332	\$78,937	\$39,165	-	-	\$0
F3XA	M4	A	9/25/2013	53	13941663499	3/1/2013	3/31/2013		\$34,770	\$83,332	\$78,937	\$39,165	-	-	\$0
F3XN	M5	N	5/20/2013	68	13962650353	4/1/2013	4/30/2013		\$39,165	\$413,425	\$268,621	\$183,969	-	-	\$0
F3XA	M5	A	9/25/2013	70	13941663552	4/1/2013	4/30/2013		\$39,165	\$413,425	\$268,621	\$183,969	-	-	\$0
F3XN	M6	N	6/20/2013	95	13963153595	5/1/2013	5/31/2013		\$183,969	\$296,692	\$291,192	\$189,469	-	-	\$0
F3XA	M6	A	9/27/2013	95	13941670758	5/1/2013	5/31/2013		\$183,969	\$296,692	\$291,192	\$189,469	-	-	\$0
F3XN	M7	N	7/20/2013	53	13964427816	6/1/2013	6/30/2013		\$189,469	\$59,537	\$79,450	\$169,555	-	-	\$0
F3XA	M7	A	9/27/2013	54	13941670853	6/1/2013	6/30/2013		\$189,469	\$59,537	\$79,450	\$169,555	-	-	\$0
F3XN	M8	N	8/20/2013	55	13941476269	7/1/2013	7/31/2013		\$169,555	\$126,273	\$59,416	\$236,413	-	-	\$0
F3XN	M9	N	9/20/2013	50	13941637826	8/1/2013	8/31/2013		\$236,413	\$57,669	\$70,307	\$223,775	-	-	\$0
F3XN	M10	N	10/20/2013	57	13942159947	9/1/2013	9/30/2013		\$223,775	\$69,717	\$72,622	\$220,870	-	-	\$0
F3XN	M11	N	11/20/2013	60	13942590353	10/1/2013	10/31/2013		\$220,870	\$104,989	\$68,793	\$257,065	-	-	\$0
F3XN	M12	N	12/20/2013	34	13944254250	11/1/2013	11/30/2013		\$257,065	\$68,807	\$58,336	\$267,536	-	-	\$0
F3XN	YE	N	1/31/2014	66	14940245681	12/1/2013	12/31/2013		\$267,536	\$9,049	\$68,499	\$208,085	-	-	\$0
F3XN	M2	N	2/20/2014	57	14960473170	1/1/2014	1/31/2014		\$208,085	\$108,949	\$95,993	\$221,041	-	-	\$0
F3XN	M3	N	3/20/2014	39	14960535575	2/1/2014	2/28/2014		\$221,041	\$23,353	\$84,268	\$160,125	-	-	\$0
F3XN	M4	N	4/19/2014	66	14960854336	3/1/2014	3/31/2014		\$160,125	\$42,213	\$85,034	\$117,304	-	-	\$0
F3XN	M5	N	5/20/2014	63	14941239907	4/1/2014	4/30/2014		\$117,304	\$68,246	\$74,829	\$110,722	-	-	\$0
F3XN	M6	N	6/20/2014	84	14941625596	5/1/2014	5/31/2014		\$110,722	\$91,744	\$175,062	\$27,403	-	-	\$0

F3XA	M6	A	9/3/2014	84	14950095875	5/1/2014	5/31/2014	\$110,722	\$91,744	\$175,062	\$27,403	-	-	\$0
F3XN	M7	N	7/20/2014	117	14961690390	6/1/2014	6/30/2014	\$27,403	\$115,543	\$133,078	\$9,869	-	-	\$0
F3XN	M8	N	8/20/2014	75	14970725127	7/1/2014	7/31/2014	\$9,869	\$214,059	\$174,377	\$49,552	-	-	\$0
F3XA	M8	A	12/19/2014	76	14953216176	7/1/2014	7/31/2014	\$9,869	\$214,059	\$174,377	\$49,552	-	-	\$0
F3XN	M9	N	9/20/2014	71	14970932472	8/1/2014	8/31/2014	\$49,552	\$85,651	\$119,686	\$15,517	-	-	\$0
F3XN	M10	N	10/20/2014	156	14951856155	9/1/2014	9/30/2014	\$15,517	\$212,782	\$185,929	\$42,369	-	-	\$0
F3XN	12G	N	10/23/2014	26	14952540083	10/1/2014	10/15/2014	\$42,369	\$130,971	\$69,152	\$104,189	-	-	\$0
F3XN	30G	N	12/4/2014	90	14953165590	10/16/2014	11/24/2014	\$104,189	\$446,870	\$518,408	\$32,651	-	-	\$0
F3XN	YE	N	1/31/2015	97	15950577012	11/25/2014	12/31/2014	\$32,607	\$41,777	\$37,881	\$16,702	-	-	\$0
F1A		A	2/19/2013	6	13960946815			-	-	-	-	-	-	-
Totals									\$2,942,407	\$2,974,997				

**Response Codes, Due Dates, and Receipt Dates for
Democratic Party of South Carolina
(C00007658)**

Standard 5

Report	Response Code	Description	Due Date	Response Date
2013 M4	LAR	State, District or Local Party Receives > \$10,000 from Individual or Non-Qualified Committee (U5-18)	8/26/13	9/25/13
2013 M5	LAR	Receipt from Corporation AND/OR LLC (U5-5)	8/26/13	9/25/13

Standard 6

Report	Response Code	Description	Due Date	Response Date
2014 YE	NR	Cash Discrepancy (U6-11)	4/14/15	N/A
		Column B Totals Incorrect (U6-7)		

Standard 7

Report	Response Code	Description	Due Date	Response Date
2013 M2	LAR	Offset on Schedule A / No Disbursement Disclosed (U7-64)	8/26/13	9/25/13
2013 M4	LAR	Offset on Schedule A / No Disbursement Disclosed (U7-64)	8/26/13	9/25/13
2014 M7	LAR	Offset on Schedule A / No Disbursement Disclosed (U7-64)	9/22/14	12/19/14
2014 M8	LAR	Offset on Schedule A / No Disbursement Disclosed (U7-64)	11/24/14	12/19/14
2014 M9	LAR	Offset on Schedule A / No Disbursement Disclosed (U7-64)	12/11/14	12/19/14

Standard 8

Report	Response Code	Description	Due Date	Response Date
2013 M4	LIR	Inadequate Employer/Occupation (U8-2)	8/26/13	9/25/13

Standard 10

Report	Response Code	Description	Due Date	Response Date
2014 30G	NR	Contributions/Transfers Made Missing Information (U10-1)	4/14/15	N/A

Standard 11

Report	Response Code	Description	Due Date	Response Date
2013 M5	LAR	Clarification of Exempt Activities in General (U11-8)	8/26/13	9/25/13
2013 M6	LAR	Exempt Activity with Prior Transfer-In from National Party Committee (U11-5)	9/3/13	9/27/13

Standard 12

Report	Response Code	Description	Due Date	Response Date
2013 M5	LIR	Omitted Information (B, H6 and/or L-B) (U12-25)	8/26/13	9/25/13
2013 M6	LIR	Omitted Information (B, H6 and/or L-B) (U12-25)	9/3/13	9/27/13

Standard 13

Report	Response Code	Description	Due Date	Response Date
2013 M4	LAR	Omitted Information (Schedules B and/or H4) (U13-59)	8/26/13	9/25/13
2013 M7	LIR	Omitted Information (Schedules B and/or H4) (U13-59)	9/3/13	9/27/13
2013 M10	LAR	Line 18(a) and 21(a)(ii), Column A Discrepancy (U13-73)	2/13/14	2/21/14
2014 M8	LAR	Omitted Full Name and/or Mailing Address (U13-47)	11/24/14	12/19/14
		Exempt Activity with prior Transfer-In from National Party Committee (U13-62)		
2014 30G	NR	Payments for Salary/Wages Allocated on Schedule H4 (U13-75)	4/14/15	N/A
2014 YE	NR	Line 18(a) and 21(a)(ii), Column A Discrepancy (U13-73)	4/14/15	N/A
		Event Year-to-Date Totals Incorrect (H4) (U13-44)		
		Omitted Full Name and/or Mailing Address (U13-47)		
		Voided/Returned Checks on Schedule H4 (U13-88)		

Standard 15

Report	Response Code	Description	Due Date	Response Date
2013 M6	LAR	Coordinated Expenditures Made After General Election Date (U15-5)	9/3/13	9/27/13

**Democratic Party of South Carolina
(C00007658)**

1. List of Affiliated Committees:

None

2. List of Pseudonyms:

None

3. Coordinated Expenditure Report:

See attached

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

None

SUMMARY REPORT OF COORDINATED EXPENDITURES

LIST OF COORDINATED EXPENDITURES FOR:

C00007658 DEMOCRATIC PARTY OF SOUTH CAROLINA

ASSIGNED TO ANALYST: 320

RELATED COORDINATED EXPENDITURES WERE ALSO MADE BY THE FOLLOWING COMMITTEES:

C00000935 DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE

ASSIGNED TO ANALYST: 317

5/20/2015

COORDINATED EXPENDITURES

CMTE ID	TRANS CODE	TRANS DATE	TRANS AMOUNT	RPT TYPE	IMAGE NUMBER	MEMO TEXT
H2SC02042	CLYBURN, JAMES E.					
C00007658	24C	10/03/2014	\$ 9,000.00	12G	14952540102	
C00007658	24C	10/10/2014	\$ 392.84	12G	14952540102	
TOTAL:			9,392.84			

H4SC01172	COLBERT BUSCH, ELIZABETH					
C00007658	24C	04/02/2013	\$ 40,000.00	M5	13941663612	
C00000935	24C	04/15/2013	\$ 5,000.00	M5	13941629037	
C00000935	24C	05/03/2013	\$ 5,000.00	M6	13964893536	
C00000935	24C	05/07/2013	\$ 600.00	M6	13964893536	
C00007658	24C	05/07/2013	\$ 60.00	M6	13941670836	
C00007658	24C	05/10/2013	\$ 10,040.80	M6	13941670836	
C00007658	24C	05/17/2013	\$ 9,177.00	M6	13941670836	
C00000935	24C	05/22/2013	\$ 13.75	M6	13964893536	
C00000935	24C	06/17/2013	\$ 22.08	M7	13964883910	
C00007658	24C	08/29/2013	\$ 618.57	M9	13941637850	
TOTAL:			70,532.20			

S4SC00364	HUTTO, CHARLES BRADLEY					
C00007658	24C	10/10/2014	\$ 59.43	12G	14952540102	
TOTAL:			59.43			