

## REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: October 25, 2006

ANALYST: Rosa G. Lewis

- I. COMMITTEE: Arizona Republican Party  
(C00008227)  
Kirk Adams, Treasurer (3/13/06-Present)  
Woody Martin, Treasurer (4/29/05-3/12/06)  
3501 North 24th Street  
Phoenix, AZ 85016
- II. RELEVANT STATUTE: 2 U.S.C. §434(b)(2)(A)  
2 U.S.C. §434(b)(2)(D)  
2 U.S.C. §434(b)(2)(F)  
11 C.F.R. §104.3(a)(2)(i)(A) and (B)  
11 C.F.R. §104.3(a)(2)(iii)  
11 C.F.R. §104.3(a)(2)(v)

## III. BACKGROUND:

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

The Arizona Republican Party ("the Committee") filed an Amended 2006 April Monthly Report to disclose additional receipts totaling \$232,238.00 (Attachment 2).

On April 20, 2006, the Committee filed the 2006 April Monthly Report covering the period from March 1, 2006 to March 31, 2006 (Image 26930091287). This original report disclosed \$54,002.58 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals/Persons Other than Political Committees), \$19,644.00 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals/Persons Other than Political Committees), \$12,800.00 in receipts on Line 11(c) (Contributions from Other Political Committees), and \$0.00 in receipts on Line 12 (Transfers from Affiliated/Other Party Committees) of the Detailed Summary Page (Image 26930091289).

On May 17, 2006, the Committee filed an Amended 2006 April Monthly Report covering the period from March 1, 2006 to March 31, 2006 (Image 26930138274). The report disclosed \$237,375.00 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals/Persons Other than Political Committees), \$47,709.58 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals/Persons Other than Political

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Committees), \$5,000 in receipts on Line 11(c) (Contributions from Other Political Committees), and \$23,600 in receipts on Line 12 (Transfers from Affiliated/Other Party Committees) of the Detailed Summary Page (Image 26930138276).

On July 5, 2006, a Request for Additional Information ("RFAI") was sent to the Committee referencing the Amended 2006 April Monthly Report, received May 17, 2006. Among other discrepancies, the RFAI asked for clarification regarding the \$227,238.00 in additional receipts on Lines 11(a)(i), 11(a)(ii), and 12 that were not disclosed on the Committee's original 2006 April Monthly Report (Image 26039104531).

On August 2, 2006, the Committee filed an Amended 2006 April Monthly Report covering the period from March 1, 2006 to March 31, 2006 (Image 26960282446). The report disclosed \$242,375.00 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals/Persons Other than Political Committee), 28,065.54 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals/Persons Other than Political Committees), \$7,800 in receipts on Line 11(c) (Contributions from Other Political Committees)<sup>1</sup>, and \$23,600 in receipts on Line 12 (Transfers from Affiliated/Other Party Committees) of the Detailed Summary Page (Image 26960282448). In a memo text attached to the report, the Committee stated, "The difference in the original [report] filed and the amendment in receipts and disbursements was due to a late discovery of lack of date entered into the reporting software. We filed the original report with what was entered at the time of the due date, entered and corrected the remaining data for the month and submitted an amendment. This occurrence has not happened before and measures have been taken to ensure the data entry is finished correctly in a timely manner." (Image 26960282508)

On August 22, 2006, the RAD analyst called Kirk Adams, the Committee Treasurer. The Analyst left a message on Mr. Adams' voicemail which stated that the Committee's increase in receipts on its Amended 2006 April Monthly Report was referable to the Office of General Counsel (Attachment 3).

Also on August 22, 2006, the RAD analyst contacted Corie Chan, a representative of the Committee. The Analyst informed Ms. Chan that the increase in receipts disclosed on the Amended 2006 April Monthly Report was referable to the Office of General Counsel. Ms. Chan explained that a new employee had filed the report and that she thought it was better for the Committee to file the information they had, instead of filing late. The Analyst explained that the Committee's reports should disclose all activity and be filed timely to avoid any fines or referrals. The Analyst highlighted that she had left a message with the treasurer and also asked Ms. Chan to submit any additional information regarding this activity in the form of a miscellaneous electronic submission (Form 99) (Attachment 3).

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

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FEDERAL ELECTION COMMISSION  
OGC INDEX - (0) (2005-2006)

DATE 10/25/2006  
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ARIZONA REPUBLICAN PARTY  
Mark Adams  
FILING FREQUENCY: MONTHLY

3501 North 24th Street

Phoenix

PARTY QUALIFIED  
AZ 85016

ID #C00008227

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
1		A		4/29/2005	4	25980490926						
1		A		3/13/2006	4	26970115507						
MS		T		5/06/2005	1	25990713140						
MS		T		3/13/2006	1	26970115318						
MS		T		8/04/2006	1	26940284370						
RQ	M2	2		7/27/2005	4	25038861230	1/01/2005 1/31/2005					
RQ	M2	2		10/12/2005	2	25038903967	1/01/2005 1/31/2005					
RQ	M3	2		7/27/2005	3	25038861234	2/01/2005 2/28/2005					
RQ	M3	2		10/12/2005	3	25038903969	2/01/2005 2/28/2005					
RQ	M4	2		8/03/2005	6	25038874447	3/01/2005 3/31/2005					
RQ	M4	2		10/12/2005	3	25038903972	3/01/2005 3/31/2005					
RQ	M5	2		8/03/2005	4	25038874443	4/01/2005 4/30/2005					
RQ	M5	2		10/19/2005	4	25038912789	4/01/2005 4/30/2005					
RQ	M6	2		10/19/2005	4	25038912785	5/01/2005 5/31/2005					
RQ	M7	2		10/26/2005	3	25038915046	6/01/2005 6/30/2005					
RQ	M8	2		10/26/2005	3	25038915043	7/01/2005 7/31/2005					
RQ	M12	2		1/25/2006	4	26038960315	11/01/2005 11/30/2005					
RQ	M12	2		4/12/2006	3	26039032599	11/01/2005 11/30/2005					
RQ	M12	2		4/19/2006	3	26039052988	11/01/2005 11/30/2005					
RQ	YE	2		3/01/2006	3	26039004310	12/01/2005 12/31/2005					
RQ	M3	2		4/26/2006	6	26039061303	2/01/2006 2/28/2006					
RQ	M4	2		5/24/2006	7	26039084838	3/01/2006 3/31/2006					
RQ	M4	2		7/05/2006	5	26039104531	3/01/2006 3/31/2006					
RQ	M5	2		7/05/2006	4	26039104536	4/01/2006 4/30/2006					
RQ	M6	2		7/12/2006	3	26039113781	5/01/2006 5/31/2006					

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FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
RQ	M7	2		9/13/2006	6	26039182404	6/01/2006 6/30/2006					
RQ	M8	2		10/04/2006	5	26039193582	7/01/2006 7/31/2006					
RQ	M9	2		10/20/2006	7	26039240862	8/01/2006 8/31/2006					
3	M2	N	P	2/18/2005	54	25990078964	1/01/2005 1/31/2005	232587	122923	106717	248792	11829
3	M2	A	P	3/21/2005	53	25980452096	1/01/2005 1/31/2005	232587	122923	106717	248792	11829
3	M2	A	P	8/23/2005	52	25970972695	1/01/2005 1/31/2005	232587	122923	106717	248792	11829
3	M2	A	P	10/24/2005	52	25971399518	1/01/2005 1/31/2005	232587	122923	106717	248792	11829
27044170733	M3	N	P	3/18/2005	50	25980451646	2/01/2005 2/28/2005	248792	94455	123159	220088	0
	M3	A	P	3/21/2005	49	25980452149	2/01/2005 2/28/2005	248792	94455	123159	220088	0
	M3	A	P	8/23/2005	50	25970972747	2/01/2005 2/28/2005	248792	94455	123159	220088	0
	M3	A	P	10/24/2005	50	25971399570	2/01/2005 2/28/2005	248792	94455	123159	220088	0
	M4	N	P	4/20/2005	72	25990534343	3/01/2005 3/31/2005	220088	194475	58489	356074	3115
	M4	A	P	9/01/2005	74	25970990706	3/01/2005 3/31/2005	220088	194475	58489	356074	782
	M4	A	P	10/24/2005	73	25971399620	3/01/2005 3/31/2005	220088	194475	58489	356074	782
	M5	N	P	5/19/2005	68	25990888589	4/01/2005 4/30/2005	356074	109217	81439	383852	0
	M5	A	P	9/01/2005	69	25970990480	4/01/2005 4/30/2005	356074	109217	81439	383852	0
	M5	A	P	9/20/2005	68	25980628623	4/01/2005 4/30/2005	356074	109217	81439	383852	0
	M5	A	P	10/27/2005	68	25971405697	4/01/2005 4/30/2005	356074	109217	81439	383852	0
3	M6	N	P	6/20/2005	52	25970411919	5/01/2005 5/31/2005	383852	41100	121452	303500	0
3	M6	A	P	9/20/2005	52	25980628691	5/01/2005 5/31/2005	383852	41100	121452	303500	0
3	M6	A	P	10/27/2005	53	25971405765	5/01/2005 5/31/2005	383852	41100	121452	303500	0
3	M7	N	P	7/19/2005	37	25970699403	6/01/2005 6/30/2005	303500	39090	83765	258825	1432
3	M7	A	P	9/20/2005	37	25980628743	6/01/2005 6/30/2005	303500	39090	83765	258825	1432
3	M7	A	P	11/08/2005	37	25971444183	6/01/2005 6/30/2005	303500	39090	83765	258825	1432
3	M8	N	P	8/19/2005	59	25970930321	7/01/2005 7/31/2005	258825	38390	131044	166171	6736
3	M8	A	P	9/20/2005	59	25980628780	7/01/2005 7/31/2005	258825	38390	131044	166171	6736
3	M8	A	P	11/08/2005	59	25971444220	7/01/2005 7/31/2005	258825	38390	131044	166171	6736
3	M9	N	P	9/20/2005	57	25971072490	8/01/2005 8/31/2005	166171	68939	63884	171226	9406

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3	M10	N	P	10/21/2005	37	25971397783	9/01/2005 9/30/2005	171226	39075	96611	113690	0
3	M10	A	P	10/27/2005	51	25971405364	9/01/2005 9/30/2005	171226	39075	96611	113690	0
3	M11	N	P	11/18/2005	64	25980675085	10/01/2005 10/31/2005	113690	75609	134638	54661	3098
3	M12	N	P	12/20/2005	57	25971659184	11/01/2005 11/30/2005	54661	150017	43445	161233	3098
3	M12	A	P	2/24/2006	58	26970061408	11/01/2005 11/30/2005	54661	150017	43445	161233	0
3	M12	A	P	5/12/2006	57	26950108304	11/01/2005 11/30/2005	54661	150017	43445	161233	0
3	YE	N	P	1/31/2006	51	26980065882	12/01/2005 12/31/2005	161233	38980	97153	103060	0
3	M2	N	P	2/17/2006	58	26990329039	1/01/2006 1/31/2006	103060	117009	105524	114545	0
3	M2	A	P	5/17/2006	59	26950112863	1/01/2006 1/31/2006	103060	119509	108024	114545	0
3	M3	N	P	3/20/2006	53	26920027007	2/01/2006 2/28/2006	114545	132844	74818	172571	0
3	M3	A	P	5/17/2006	56	26940142552	2/01/2006 2/28/2006	114545	132844	74818	172571	0
3	M4	N	P	4/20/2006	46	26930091287	3/01/2006 3/31/2006	172571	108055	90478	190148	0
3	M4	A	P	5/17/2006	62	26930138274	3/01/2006 3/31/2006	172571	335293	83739	424126	0
3	M4	A	P	8/02/2006	63	26960282446	3/01/2006 3/31/2006	172571	340293	88739	424126	0
3	M5	N	P	5/19/2006	65	26930144881	4/01/2006 4/30/2006	424126	243029	98785	568369	0
3	M5	A	P	8/02/2006	66	26930305078	4/01/2006 4/30/2006	424126	243029	98785	568369	0
3	M6	N	P	6/19/2006	89	26930181912	5/01/2006 5/31/2006	568369	123300	136514	555156	0
3	M6	A	P	8/04/2006	89	26960288810	5/01/2006 5/31/2006	568369	133300	146514	555156	0
3	M7	N	P	7/20/2006	99	26930293412	6/01/2006 6/30/2006	555156	121685	203775	473066	0
3	M7	A	P	7/31/2006	101	26960280608	6/01/2006 6/30/2006	555156	121685	203775	473066	0
3	M7	A	P	8/18/2006	101	26940303156	6/01/2006 6/30/2006	555156	121685	203775	473066	0
3	M7	A	P	10/11/2006	105	26940402012	6/01/2006 6/30/2006	555156	121685	203775	473066	0
3	M8	N	P	8/18/2006	76	26960334072	7/01/2006 7/31/2006	473066	370195	281168	562093	0
3	M9	N	P	9/20/2006	119	26930401770	8/01/2006 8/31/2006	562093	413210	309289	666014	0
3	M10	N	P	10/20/2006	143	26940508230	9/01/2006 9/30/2006	667770	623948	353095	938622	0
TOTAL									3510283	2806003		

**Arizona Republican Party (C00008227)**

2006 April Monthly Report/Amended 2006 April Monthly Report

Overview of Additional Receipts

Report Line	Original 2006 April Monthly Report (Image 26930091289)	Amended 2006 April Monthly Report, received 8/2/2006 (Image 26960282448)	Receipt Variance Amount
11(a)(i)	54,002.58	\$242,375.00	\$188,372.42
11(a)(ii)	19,644.00	\$47,709.58	\$28,065.58
11(c)	12,800.00	\$5,000	-\$7,800.00
12	0.00	\$23,600.00	\$23,600.00
<b>Total:</b>			<b>\$232,238.00</b>