



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

08L-21

May 6, 2008

**MEMORANDUM**

TO: THOMASENIA P. DUNCAN  
GENERAL COUNSEL

THROUGH: PATRINA M. CLARK *gmc*  
STAFF DIRECTOR

FROM: JOHN D. GIBSON *JDG*  
CHIEF COMPLIANCE OFFICER

PATRICIA CARMONA *PC*  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

BY: DEBBIE CHACONA/LAURA SINRAM *DC* *JS*  
PARTY/NON-PARTY BRANCH

SUBJECT: REFERRAL OF CALIFORNIA REPUBLICAN PARTY/V8

The Reports Analysis Division (RAD) is referring California Republican Party/V8 ("the Committee") to the Office of General Counsel (OGC) for failure to transfer-out the non-federal portion of activity allocated between federal and non-federal accounts, which appears to meet the definition of Federal Election Activity ("FEA"), from the federal account during the 2005-2006 election cycle. This activity totals \$1,930,314.24. In addition, the Committee received apparent excessive non-federal transfers into its federal account totaling approximately \$386,345.02 for allocated Administrative expenses during the 2005-2006 election cycle.

If you have any questions regarding this matter, please contact Debbie Chacona at 694-1145 or Laura Sinram at 694-1157.

Attachments

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REPORTS ANALYSIS REFERRAL  
TO  
OFFICE OF GENERAL COUNSEL

DATE: May 6, 2008

ANALYST: Laura Sinram

- I. COMMITTEE: California Republican Party/V8  
C00140590  
Keith Carlson, Treasurer  
1903 West Magnolia Blvd  
Burbank, CA 91506
- II. RELEVANT STATUTE(S): 2 U.S.C. §431(20)  
2 U.S.C. §441i(b)  
11 C.F.R. §100.24  
11 C.F.R. §104.17  
11 C.F.R. §106.7(b), (c), (d), (e) and (f)  
11 C.F.R. §300.32 (a) and (b)

III. BACKGROUND:

California Republican Party/V8 ("the Committee") is being referred for failure to transfer-out the non-federal portion of activity allocated between the federal and non-federal accounts totaling \$1,930,314.24 on its 2006 October Monthly and 12 Day Pre-General Reports, which appears to meet the definition of Federal Election Activity ("FEA") (Attachment 2) and for receiving excessive non-federal transfers into the federal account totaling \$386,345.02 for allocated Administrative expenses disclosed during calendar year 2006 (Attachment 3).

**Failure to Transfer-out the Non-Federal Portion of Apparent FEA Allocated between the Federal and Non-Federal Accounts**

On its 2006 October Monthly and 12 Day Pre-General Reports, the Committee disclosed activity identified as "F&M D.C.S. Piece" on Schedule H4 (Disbursements for Allocated Federal and Non-Federal Activity) that appears to be activity which does not meet the definition of

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allocable activity. Further, the Committee's responses indicate that this activity meets the definition of FEA, and therefore, must be paid with one hundred (100) percent federal funds or allocated, if appropriate, between federal and Levin funds using the correct allocation ratio. In addition, the Committee categorized the activity as Direct Candidate Support and applied an incorrect allocation ratio based on the time and space method rather than a fixed ratio. The Committee transferred in a total of \$1,930,314.24 from the non-federal account for the event "F&M D.C.S. Piece" on its 2006 October Monthly and 12 Day Pre-General Reports (Attachment 2).

### **2006 October Monthly Report**

On October 29, 2006, the Committee filed the 2006 October Monthly Report covering the period from September 1, 2006 through September 30, 2006. Schedule H4 disclosed three (3) disbursements for "Exempt Party Mailer" for which the federal share totaled \$189,658.91 and the non-federal share totaled \$1,459,548.98 (Attachment 4), representing activity that did not appear to meet the definition of activity that can be allocated between the federal and non-federal accounts (Images 26960574843-44). Further, these disbursements appear to meet the definition of FEA, as this reporting period falls within all FEA time frames for the State of California.<sup>1</sup> In addition, these three (3) entries were categorized as Direct Candidate Support for an event titled "F&M D.C.S. Piece." The Committee also disclosed four (4) transfers from the non-federal account(s) on Schedule H3 supporting Line 18(a) (Transfers from Non-Federal Account for Allocated Activity) totaling \$1,451,795.24 (Attachment 2), which were categorized as Direct Candidate Support for the event titled "F&M D.C.S. Piece" (Images 26960574567, 26960574570 and 26960574573). In addition, Schedule H2 (Allocation Ratios) disclosed a Direct Candidate Support event titled "F&M D.C.S. Piece" (Image 26960574562) and a memo text attached to the report disclosed the following, in part:

"Please note that none of the activity on Line 21(b) or on the H4 schedule is FEA or contains express advocacy...Direct candidate payment reflected on H2, H3 and page [blank] of H4 reflects conservative allocation of federal dollar percentage (11.5%) although no federal candidate is directly identified" (Image 26960574846).

Furthermore, on October 28, 2006, Fred Arjani, Consultant and Designated Agent for the Committee, called the Reports Analysis Division Analyst ("RAD") Analyst.<sup>2</sup> Mr. Arjani asked a hypothetical question. He said that he wanted to allocate an absentee ballot but not according to the prevailing allocation ratio. The Analyst explained that California had a Senate but no Presidential election in 2006; thus, the appropriate allocation ratio is twenty-one (21) percent federal to seventy-nine (79) percent non-federal or Levin, depending on the type of activity. Mr.

<sup>1</sup> The Federal Election Activity ("FEA") time frames for the State of California for the 2005-2006 election cycle are as follows: Voter Registration time frames – from February 6, 2006 through June 6, 2006 and from July 10, 2006 through November 7, 2006; Voter Identification, Get-Out-The-Vote activity, and Generic Campaign Activity timeframe – from March 10, 2006, through November 7, 2006.

<sup>2</sup> Mr. Arjani was not listed on the Committee's Statement of Organization (FEC FORM 1) as the Designated Agent during the reporting periods in question; however, as of 3/20/07, he is disclosed as a Designated Agent.

Arjani wanted to use a ratio of eleven (11) percent federal to eighty-eight (88) percent non-federal. Mr. Arjani said that he was trying to attach a document to the absentee mailer, and this is how he arrived at his percentage. He also wanted to know if this activity would be FEA. The Analyst informed Mr. Arjani that this would be considered FEA. The Analyst told Mr. Arjani that he needed to utilize the appropriate allocation ratio and that his method did not appear to be something the Committee could do. However, since the question was hypothetical, the Analyst transferred Mr. Arjani to the Information Department for further inquiry (Attachment 5).

On October 21, 2006, the Committee filed a Miscellaneous Electronic Submission (FEC FORM 99) which disclosed the same statements as were included in the memo text of the original 2006 October Monthly Report. This submission referenced pages 710-711 of Schedule H4. These page numbers were not included in the memo text attached to the 2006 October Monthly Report (Image 26960574960).

On October 26, 2006, the Committee filed an Amended 2006 October Monthly Report. The amended report reflected no changes to the relevant entries on Schedules H3 and H4. This report also disclosed the same memo text that was included with the original 2006 October Monthly Report (Images 26960644438-39, 26960644875, 26960644878, 26960644881, 26960645151-52 and 26960645154).

On January 31, 2007, a Request for Additional Information ("RFAI") was sent to the Committee referencing the Amended 2006 October Monthly Report, received October 26, 2006. Among other discrepancies, the RFAI asked for clarification regarding the three (3) disbursements disclosed on Schedule H4 for "Exempt Party Mailer." The Committee was asked to clarify whether the activity disclosed met the conditions of exempt party activity, whether the activity referenced a federal candidate, what type of FEA this activity represented, or why the activity did not meet the definition of FEA (Images 27039371841-42).

On March 5, 2007, the Committee filed two (2) Amended 2006 October Monthly Reports. There were no changes in the amounts of the transfers disclosed on Schedule H3 or the three (3) entries on Schedule H4 previously disclosed as "Exempt Party Mailer." However, the Committee changed the purpose of disbursement for the Schedule H4 entries from "Exempt Party Mailer" to "Party Mailer NO Fed. CAND Identified," and the entries were still categorized as Direct Candidate Support. Furthermore, the Committee listed three (3) apparently related entries on Schedule B supporting Line 23 (Contributions to Federal Candidates/Committees and Other Political Committees) paid to the same vendor and disclosed amounts equal to the federal portions of the entries that were disclosed on Schedule H4 supporting Line 21(a)(i). These Schedule B, Line 23 entries were disclosed as "IN KIND" and for a "Federal" election, but did not include a purpose or identify a federal candidate (Images 27930219037-38, 27930219476, 27930219479, 27930219482, 27930219752, and 27930219458).

Also, on March 5, 2007, the Committee filed an FEC FORM 99 which referenced the Amended 2006 October Monthly Reports, received on March 5, 2007. This response addressed the RFAI sent January 31, 2007, regarding the disbursements on Schedule H4 previously disclosed as "Exempt Party Mailer" and currently disclosed as "Party Mailer NO Fed. CAND

Identified." The Committee stated, "the expenditures do not require any non-federal or Levin reimbursement of the Federal account. The mailings in question were state candidate related, mostly involving non-federal 'issue advocacy.'" The Committee also explained,

"[N]o Federal candidate appeared on any California Republican Party/Victory 06 mailing or communication during the 2006 election cycle other than one specific mailing using coordinated expenditure authority largely due to the impact of such identification on the funding requirements imposed for FEA under BCRA. A small portion of the piece included an element that was "voter drive" but not Federal Election Activity."

Also in this response, the Committee affirmed that the activity was categorized as Direct Candidate Support on Schedule H2 due to software limitations in trying to enter an "unusual allocation" ratio of eleven and a half (11.5) percent federal to eighty-eight and a half (88.5) percent non-federal for "F&M D.C.S. Piece." (Images 27930219769-70).

On March 30, 2007, Mr. Arjani called the Analyst regarding the latest Amended 2006 October Monthly Report, received on March 5, 2007. Mr. Arjani said that he noticed the Committee's software vendor had used a split transaction feature and had moved the federal portion of some of the allocable activity on Schedule H4 to Schedule B for Line 23. The Analyst explained that this is a problem and must be fixed. Mr. Arjani asked if he could submit an FEC FORM 99 explaining the situation. The Analyst explained that this would only partially fix the problem and that the report would actually have to be amended to correct this issue. Mr. Arjani said that he might have a similar problem on the latest Amended 2006 12 Day Pre-General Report (Attachment 5).

On March 31, 2007, the Committee filed an FEC FORM 99 that referenced the Amended 2006 October Monthly Reports, received March 5, 2007. The Committee explained the discrepancies related to Line 23 and restated that the Committee made no contributions to Federal candidates or committees (Image 27930395296).

On April 6, 2007, an RFAI was sent to the Committee referencing the Amended 2006 October Monthly Report, received March 5, 2007. The Committee was asked, among other issues, to further clarify payments originally disclosed as "Exempt Party Mailer" on Schedule H4, which were now disclosed as "Party Mailer NO fed. CND Identified," as the activity appeared to meet the definition of FEA. Further, the RFAI recommended that the Committee transfer the funds received by the federal account for this apparent FEA back to the non-federal account. The Committee was also asked to provide the name of the candidate or committee for the in-kind contributions disclosed on Schedule B for Line 23, which appeared to be related to the disbursements on Schedule H4 for "Party Mailer NO fed. CND Identified." The RFAI went on to state that for any contributions made in excess of \$5,000.00, a refund must be requested and made within sixty (60) days of receipt (Images 27039413820-22).

Also on April 6, 2007, the Committee filed an Amended 2006 October Monthly Report. In this amended report, the Committee responded to some of the issues addressed in the RFAI

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that had been sent on this same day. The entries on Line 23 were removed, and the Line 21(a)(i) total disclosed on the Detailed Summary Page now equaled the supporting Schedule H4 entries. In addition, there were no changes in the relevant amounts of the non-federal transfers or in the activity disclosed on Schedule H4 (Images 27930470458 and 27930470902-27930471171).

On April 26, 2007, Mr. Arjani called about the RFAI referencing the Amended 2006 October Monthly Reports, received March 5, 2007 and the Amended 12 Day Pre-General Report, filed on April 6, 2007. He wanted the Analyst to check the adequacy of the Committee's responses and asked how to adequately respond to the question of whether the activity could be allocated between the federal and non-federal accounts, as he had already submitted a response to that issue. The Analyst explained that the Committee had previously responded to the situation, but the response was not adequate to clear the situation. The Analyst explained that based on the Committee's responses to date, the Committee still has to transfer the non-federal portion of those funds out of the federal account. Mr. Arjani mentioned sending another FEC FORM 99 further explaining the situation. The Analyst explained that if the non-federal funds are not transferred-out of the federal account, the Committee would be referred to the Office of General Counsel (OGC). Mr. Arjani then asked if the Committee could respond at all. The Analyst said the Committee could respond if Mr. Arjani has further information regarding the situation; however, at this point, there was very little that could be done, other than having the funds transferred-out. Mr. Arjani was very concerned about the amount of federal funds the party currently had on hand versus the amount that would have to be transferred-out. The Analyst said that between the 2006 October Monthly and 2006 12 Day Pre-General Reports, the violation amounted to about \$1.9 million. The Analyst explained that based on the Committee's responses, the activity did not appear to be allocated between the federal and non-federal accounts. Mr. Arjani asked about allocating with Levin funds. The Analyst said that the Committee had indicated that the activity was voter drive but not FEA, which posed a problem as well, given that the reporting periods are solidly within FEA time frames. The Analyst said she would call Mr. Arjani tomorrow regarding the adequacy of the Committee's responses (Attachment 5).

On April 27, 2007, the Analyst returned Mr. Arjani's call regarding the adequacy of the Committee's responses to the issues on the latest Amended 2006 October Monthly and 12 Day Pre-General Reports. The Analyst told Mr. Arjani that the Committee had adequately responded to most of the discrepancies in the RFAI referencing the Amended 2006 October Monthly Reports, received March 5, 2007. The Analyst stated that the remaining issue was the three (3) entries on Schedule H4 for "Party Mailer NO fed. CND Identified." Mr. Arjani wanted to know the Commission's position on the issue. The Analyst said that based on the current responses, the activity appeared to be FEA and, therefore, could not be allocated between federal and non-federal accounts. The Analyst further stated that the Committee needed to transfer-out the non-federal portion of funds received by the federal account for those purposes. Mr. Arjani then asked why the disbursements were not allocable. The Analyst explained that, first of all, the activity is not allocable because the Committee has not identified a federal component. The Committee has clarified that the activity was for 'state candidate related' items that were 'mostly involving non-federal issue advocacy.' The Analyst explained that to be allocable, the activity must have both a federal and a non-federal component. Mr. Arjani said he thought that the federal component was

established by showing the eleven (11) percent federal ratio on Schedule H2. The Analyst said merely paying for an item with federal funds does not establish a federal component. Second, the Committee said that the disbursements were for "voter drive" but are not FEA. The Analyst explained that if voter drive activities were conducted within the State's FEA time frame, they were FEA, and that voter drive activities conducted outside of FEA time frames could be allocated on Schedule H4. The Analyst further explained that voter drive activity conducted within FEA time frames must be paid for with one hundred (100) percent federal funds on Line 30(b) or, if no federal candidates are referenced, allocated between federal and Levin funds on Schedule H6. Mr. Arjani also asked about exempt activity and FEA. The Analyst explained that there are several places where these activities overlap due to the Bipartisan Campaign Reform Act of 2002 ("BCRA"). The Analyst said that if part of an expense was FEA, the entire expense must be paid as if it were FEA. The Analyst told Mr. Arjani that the Committee could provide additional clarification if there was something material that had not been included. The Analyst told Mr. Arjani that he had until May 6, 2007 to respond to the issue which was referable to OGC. The Analyst further stated that the same issue exists on the 2006 12 Day Pre-General Report. The Analyst explained that if the Committee determines this activity to be FEA, the amounts can be allocated with Levin funds on Schedule H6. However, since the seventy (70) day window for transferring Levin funds revolves around the date of the payment, the Committee could not transfer-in Levin funds for these activities. In addition, the Analyst noted that if they chose to classify the activity as FEA, the Committee must still transfer out the non-federal portion of the funds. Mr. Arjani concluded that the only option appeared to be to transfer-out the funds. Mr. Arjani said that Chuck Bell, the Committee's Counsel, wanted to speak with RAD Management in the near future (Attachment 5).

On May 7, 2007, the Committee filed an FEC FORM 99 regarding the latest Amended 2006 October Monthly Reports and the FEC FORM 99 filed March 5, 2007. The response stated, in part, that the Committee "may have inadvertently used the term 'voter drive.'" The Committee also clarified that the expenditures for "Party Mailer NO fed. CAND Identified" were not for FEA. This response further stated that the Committee was trying to comply with Advisory Opinion ("AO") 2006-19 and not to trigger FEA. The Committee stated, in part,

"[T]he expenditure was for activity mentioning only state candidates and measures, was disseminated between 30 and 15 days before the November election, did not urge recipients to vote, and did not contain any personalized information that would assist the voter to vote...[The Committee paid for] a portion of the mailings with 'hard' federal funds under 11 CFR 300.30(a)(3)...[These] expenditures could have been paid directly from the Committee's federal account and reported on Schedule B, Line 21(b) of the report. We believe that this payment of a portion of the expense with federal dollars did not convert the mailing into 'federal election activity' under the AO 2006-19 conclusion and analysis."

The Committee further stated that it would have paid for the expenditure with non-federal dollars, which the Committee stated it had on-hand at the time (Image 27990040633).

On May 10, 2007, Chuck Bell, the attorney representing the California Republican Party, called RAD Management regarding the above matter. Mr. Bell stated that he did not feel that the party mailer activity disclosed on the 2006 October Monthly and 12 Day Pre-General Reports met the definition of FEA, and that while there was a "voter drive" component to the mailer, it was minimal. RAD Management explained to him that based on responses provided by the Committee to Commission inquiries, the activity appeared to qualify as FEA and therefore could not be allocated between federal and non-federal funds. RAD Management went on to say that the responses indicate that the mailer included an element of "voter drive" and that it was mostly state candidate-related. Mr. Bell referenced AO 2006-19 as justification that the activity did not qualify as FEA. RAD Management stated that while this AO did address voter communications which were considered to be generic in nature and did not meet the definition of FEA, the AO did not conclude that these communications could be allocated between federal and non-federal funds, but rather concluded that these communications could be paid for with one hundred (100) percent non-federal funds. In addition, RAD Management added that the facts of the situation in this case, such as the timing of the communication, were not the same as the facts of the situation addressed in the AO. Mr. Bell asked if there was anything the Committee could do to resolve the situation other than transfer the non-federal portion of the activity back to the non-federal account. RAD Management stated that at this point, transferring out the funds would be the only action that would prevent the matter from being referred to OGC (Attachment 5).

On May 11, 2007, the Committee met briefly with the Analyst and RAD Management at the FEC Conference for party committees. The Committee was given the same advice as during previous conversations, to transfer-out the funds received into the federal account for the "Party Mailer NO fed. CND Identified" activity.

On August 22, 2007, the Committee filed an Amended 2006 October Monthly Report. There were no changes on this report from the previous amendment related to the issues being referred (Image 27931146709).

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

#### **2006 12 Day Pre-General Report**

On October 26, 2006, the Committee filed a 12 Day Pre-General Report covering the period from October 1, 2006 through October 18, 2006. Schedule H4 disclosed one (1) disbursement for "Exempt Party Mailer" for which the federal share totaled \$62,180.39 and the non-federal share totaled \$478,518.61 (Attachment 4), representing activity that did not appear to meet the definition of activity that could be allocated between federal and non-federal accounts (Image 26960647937). Further, this disbursement appears to meet the definition of FEA, as this reporting period falls within all FEA timeframes for the State of California. In addition, this disbursement was categorized as Direct Candidate Support activity for an event titled "F&M D.C.S. Piece." The Committee also disclosed one (1) transfer from a non-federal account(s) on Schedule H3 (Transfers from Non-Federal Account for Allocated Activity) totaling \$478,519.00 (Attachment 2), which was categorized as Direct Candidate Support for the event titled "F&M



D.C.S. Piece;" however, a Schedule H2 (Allocation Ratios) was not included in this report (Image 26960647706). Additionally, a memo text attached to the report disclosed, in part, the following:

"Please note that none of the activity on Line 21(b) or on the H4 schedule is FEA or contains express advocacy...Direct candidate payment reflected on H2, H3 and page 710-711 of H4 reflects conservative allocation of federal dollar percentage (11.5%) although no federal candidate is directly identified" (Image 26960647940).

On March 7, 2007, an RFAI was sent to the Committee referencing the 2006 12 Day Pre-General Report. Among other discrepancies, the RFAI asked for clarification regarding the disbursement disclosed on Schedule H4 for "Exempt Party Mailer." The Committee was asked to clarify whether the activity disclosed met the conditions of exempt party activity, whether federal candidates were referenced, what type of FEA this activity represented, or why it did not meet the definition of FEA (Images 27039400896-97).

On April 6, 2007, the Committee filed an Amended 2006 12 Day Pre-General Report covering the period from October 1, 2006 through October 18, 2006. There were no changes in the amount of the transfer disclosed on Schedule H3 (Image 27930471463) or the entry on Schedule H4 previously disclosed as "Exempt Party Mailer" (Image 27930471695). However, the Committee changed the purpose of disbursement for this entry from "Exempt Party Mailer" to "Party Mailer NO Fed. CAND Identified." Additionally, unlike on the original 2006 12 Day Pre-General Report, this amended report disclosed an event titled "F&M D.C.S. Piece" on Schedule H2 categorized as Direct Candidate Support (Image 27930471459).

Additionally, on April 6, 2007, the Committee filed an FEC FORM 99 which referenced the latest Amended 2006 12 Day Pre-General Report, received April 6, 2007. The response stated, in part,

"[T]he mailings in question were state candidate related, mostly involving "issue advocacy" as defined in California Government Code 85310. No federal candidate appeared on any California Republican Party/Victory 06 mailing or communication during the 2006 election cycle other than one specific mailing using coordinated expenditure authority largely due to the impact of such identification on the funding requirements imposed for FEA under BCRA. A small portion of the piece included an element that was "voter drive" but no Federal Election Activity" (Image 27930470295).

On April 26, 2007, Mr. Arjani called about the RFAI referencing the Amended 2006 October Monthly Reports, received March 5, 2007 and the Amended 12 Day Pre-General Report, filed on April 6, 2007. He wanted the Analyst to check the adequacy of the Committee's responses and asked how to adequately respond to the question of whether the activity could be allocated between the federal and non-federal accounts, as he had already submitted a response to that issue. The Analyst explained that the Committee had previously responded to the situation,

but the response was not adequate to clear the situation. The Analyst explained that based on the Committee's responses to date, the Committee still has to transfer the non-federal portion of those funds out of the federal account. Mr. Arjani mentioned sending another FEC FORM 99 further explaining the situation. The Analyst explained that if the non-federal funds are not transferred-out of the federal account, the Committee would be referred to OGC. Mr. Arjani then asked if the Committee could respond at all. The Analyst said the Committee could respond if Mr. Arjani has further information regarding the situation; however, at this point, there was very little that could be done, other than having the funds transferred-out. Mr. Arjani was very concerned about the amount of federal funds the party currently had on hand versus the amount that would have to be transferred-out. The Analyst said that between the 2006 October Monthly and 2006 12 Day Pre-General Reports, the violation amounted to about \$1.9 million. The Analyst explained that based on the Committee's responses, the activity did not appear to be allocable between the federal and non-federal accounts. Mr. Arjani asked about allocating with Levin funds. The Analyst said that the Committee had indicated that the activity was water drive but not FEA, which posed a problem as well, given that the reporting periods are solidly within FEA time frames. The Analyst said she would call Mr. Arjani tomorrow regarding the adequacy of the Committee's responses (Attachment 5).

On April 27, 2007, the Analyst returned Mr. Arjani's phone call from April 26, 2007, regarding the adequacy of the Committee's responses to the issues on the latest Amended 2006 October Monthly and 12 Day Pre-General Reports. The Analyst advised the Committee to transfer-out the non-federal portion of funds received into the federal account for the "Party Mailer NO fed. CND Identified" activity (Attachment 5).

On May 11, 2007, the Committee met briefly with the Analyst and RAD Management at the FEC Conference for party committees. The Committee was given the same advice as during previous conversations, to transfer-out the funds received into the federal account for the "Party Mailer NO fed. CND Identified" activity.

On June 15, 2007, an RFAI was sent to the Committee referencing the Amended 2006 12 Day Pre-General Report, received April 6, 2007. Among other discrepancies, the RFAI asked for clarification regarding the disbursement on Schedule H4 for "Party Mailer NO Fed. CND Identified," as the activity appeared to meet the definition of FEA. Further, the RFAI recommended that the Committee transfer the funds received by the federal account for this activity back to the non-federal account (Images 27039453349-51).

On July 11, 2007, Mr. Arjani called about the RFAI the Committee received referencing the Amended 2006 12 Day Pre-General Report, received April 6, 2007. The Analyst explained that this RFAI is a follow-up letter based on the Committee's previous response. Mr. Arjani wanted to clarify that the Committee had already addressed the non-allocable activity issue for the "Exempt Party Mailer" entry. The Analyst said that the issue had been addressed inadequately and that the Committee's only remaining option was to transfer-out the money. The Analyst explained that the same procedure was followed on the 2006 12 Day Pre-General Report as was used with the 2006 October Monthly Report. After discussing the letters, Mr. Arjani asked about the pending referral. The Analyst said that the referral was currently on hold.

pending completion of some items related to the 2005-2006 federal election cycle (Attachment 5).

On July 16, 2007, the Committee filed an FEC FORM 99 in response to the RFAI referencing the Amended 2006 12 Day Pre-General Report, received April 6, 2007. In response to the inquiry on the party mailer, the submission stated, in part, that the Committee's "previous responses have dealt with this matter" (Image 27990304837).

On August 23, 2007, the Committee filed an Amended 2006 12 Day Pre-General Report. There were no changes on this report from the previous amendment related to the issues being referred (Image 27990518334).

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

#### **Failure to Transfer-out Excessive Non-Federal Funds Received by Federal Account**

The Committee disclosed apparent excessive transfers-in from the non-federal account totaling approximately \$386,345.02 during the 2006 12 Day Pre-General Report covering the period from October 1, 2006 through October 18, 2006; the 2006 30 Day Post-General Report covering the period from October 18, 2006 through November 27, 2006; and the 2006 Year End Report covering the period from November 28, 2006 through December 31, 2006 (Attachment 3).

On October 26, 2006, the Committee filed a 2006 12 Day Pre-General Report covering the period from October 1, 2006 through October 18, 2006. The report disclosed \$623,662.41 in transfers from the non-federal account for allocated Administrative activity on Schedule H3 for Line 18(a), and \$542,926.58 in the non-federal share of allocated Administrative activity on Schedule H4 for Line 21(a)(ii) (Images 26960647432-33). The following portion of memo text was included in the report:

"The transfers shown reflect variations due to timing of transfers based upon reimbursements from the non-federal and Levin accounts the federal account at different points in the 70-day window provided in {sic} Reg. 10-6.7(f)(2). No transfers were made outside the 70-day window" (Image 26960647940).

On December 7, 2006, the Committee filed a 2006 30 Day Post-General Report covering the period from October 19, 2006 through November 27, 2006. The report disclosed \$1,162,223.28 in transfers from the non-federal account for allocated Administrative activity on Schedule H3 for Line 18(a), and \$824,194.02 in the non-federal share of allocated Administrative activity on Schedule H4 for Line 21(a)(ii) (Images 26980186753-54). The following portion of memo text was included in the report:

"The transfers shown reflect variations due to timing of transfers based upon reimbursements from the non-federal and Levin accounts the federal account at

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different points in the 70-day window provided in {sic} Reg. 10-6.7(f)(2). No transfers were made outside the 70-day window" (Image 26980187671).

On January 31, 2007, the Committee filed a 2006 Year End Report covering the period from November 28, 2006 through December 31, 2006. The report disclosed \$476,738.02 in transfers from the non-federal account for allocated Administrative activity on Schedule H3 for Line 18(a), and \$461,966.01 in the non-federal share of allocated Administrative activity on Schedule H4 for Line 21(a)(ii) (Images 27950044194-95). The following portion of memo text was included on the report:

"The transfers shown reflect variations due to timing of transfers based upon reimbursements from the non-federal and Levin accounts the federal account at different points in the 70-day window provided in {sic} Reg. 10-6.7(f)(2). No transfers were made outside the 70-day window" (Image 27950044619).

On April 6, 2007, the Committee filed an Amended 2006 12 Day Pre-General Report. There were no changes in the amounts from the original report (Images 27930471187-88).

On April 18, 2007, an RFAI was sent to the Committee referencing the 2006 Year End Report. Among other discrepancies, the RFAI addressed the issue of apparent excessive non-federal transfers into the federal account for allocated Administrative activity and recommended that the Committee immediately transfer the excessive amount received by the federal account back to the non-federal account (Images 27039424905-06).

On May 3, 2007, Mr. Arjani called the Analyst. Among other issues, Mr. Arjani wanted to discuss the excessive non-federal transfers received by the federal account, included in the RFAI referencing the 2006 Year End Report. He said that the transfers might be associated with the issues previously questioned on the Amended 2006 October Monthly and 12 Day Pre-General Reports. The Analyst told Mr. Arjani that he would need to explain the discrepancy in the Committee's response<sup>3</sup> (Attachment 6).

On May 8, 2007, the Committee filed an Amended 2006 30 Day Post-General Report. The amount of non-federal transfers reported on Schedule H3 for Line 18(a) of the Detailed Summary Page did not change; however, the Committee moved activity from Schedule H4 to Schedule H6 (Allocated FEA). Therefore, the total allocated Administrative activity on Line 21(a)(ii) of the Detailed Summary Page has decreased to \$787,067.60. The amendment included the following portion of memo text: "The payment on 10/30/06 has been moved from the H4 to H6. Assuming all other open issues with the Fec {sic} are resolved, we do not believe the committee has over transferred funds, and therefore no corrective action would be necessary" (Images 27930696096-97 and 27930697014).

<sup>3</sup> After reassessing the situation, the Analyst determined that the apparent excessive transfer of non-federal funds for allocated Administrative expenses was a separate issue. The transfers for the first issue addressed in this referral for the "F&M D.C.S. Piece" activity were separate from the transfers for the allocated Administrative activity.

On May 15, 2007, the Committee filed an Amended 2006 30 Day Post-General Report. The Committee provided a copy of a wire transfer made from the federal account to the non-federal account for unrelated activity questioned in the RFAI referencing the 2006 30 Day Post-General Report (Images 27039442031-32).

On May 18, 2007, the Committee filed an Amended 2006 Year End Report. There were no changes in the amounts from the original report (Images 27990086473-74).

Also, on May 18, 2007, the Committee filed a Miscellaneous Electronic Submission (FEC FORM 99) regarding the 2006 Year End Report. The Committee stated, in part, "we believe the over transfer [of non-federal funds] only deals with the expenditures that were the basis of the previous RFAI's. The committee had previously responded to that matter" (Image 27990087062).

On June 20, 2007, the Committee filed a 2007 June Monthly Report that included a \$44,318.50 corrective transfer from the federal account to the non-federal account. This corrective transfer was for activity initially disclosed on Schedule H4 of the 2006 30 Day Post-General Report which is unrelated to the issues included in this referral<sup>4</sup> (Image 27930830099).

On August 23, 2007, the Committee filed an Amended 2006 12 Day Pre-General Report. There were no changes in the amounts from the original report (Images 27990518336-37).

On August 27, 2007, the Committee filed an Amended 2006 30 Day Post-General Report. There were no changes in the amounts from the previous amendment (Images 27990541331-32).

Also on August 27, 2007, the Committee filed an Amended 2006 Year End Report. There were no changes in the amounts from the previous amendment (Images 27990540899-900).

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

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<sup>4</sup> This corrective transfer has been factored into the \$386,345.02 violation amount for the excessive non-federal transfers received by the federal account for allocated Administrative activity.

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MS			T	1/18/2005	1	25980174114						
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3	M10	A	P	4/06/2007	718	27930470459	9/01/2006 9/30/2006	99190	3413443	3235896	276937	14941
3	M10	A	P	8/22/2007	718	27931146709	9/01/2006 9/30/2006	99190	3413443	3235896	276937	14941
3	12G	N	P	10/26/2006	511	27960847430	10/01/2006 10/18/2006	276937	1688488	1792089	165337	14941
3	12G	A	P	4/06/2007	513	27930471185	10/01/2006 10/18/2006	276937	1680488	1792089	165337	14941
3	12G	A	P	8/23/2007	513	27990518884	10/01/2006 10/18/2006	276937	1688488	1792089	165337	14941
3	30G	N	P	12/07/2006	921	26980186751	10/19/2006 11/27/2006	165337	1990809	2127181	28965	14941
3	30G	A	P	5/08/2007	921	27930696094	10/19/2006 11/27/2006	165337	1990809	2127181	28965	14941
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3	30G	A	P	8/27/2007	920	27990541329	10/19/2006 11/27/2006	165337	1990809	2127181	28965	14941
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3	YE	A	P	5/18/2007	427	27990088471	11/28/2006 12/31/2006	28965	682555	642036	69433	14941
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CA 91506

ID #C00140590

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
1			A	3/20/2007	4	27930357062						
1			A	11/20/2007	4	27931612277						
1			A	12/13/2007	54	27931651803						
MS			T	1/17/2007	1	27990010984						
MS			T	3/05/2007	1	27930219769						
MS			T	3/05/2007	1	27930219779						
MS			T	3/05/2007	2	27930219771						
MS			T	3/31/2007	1	27930395296						
MS			T	4/06/2007	1	27930470295						
MS			T	4/06/2007	1	27930470296						
MS			T	4/06/2007	1	27930470297						
MS			T	4/20/2007	1	27930664277						
MS			T	5/07/2007	1	27990080833						
MS			T	5/18/2007	1	27990087063						
MS			T	6/20/2007	1	27990184029						
MS			T	6/20/2007	1	27930889819						
MS			T	6/20/2007	1	27930880820						
MS			T	7/13/2007	1	27990221075						
MS			T	7/16/2007	1	27990304837						
MS			T	2/29/2008	1	28990535742						
MS			T	3/14/2008	2	28930769320						
MS			T	3/14/2008	2	28990569118						
MS			T	4/01/2008	1	28931005167						
MS			T	4/04/2008	1	28931059322						
RQ			1	11/07/2007	3	27039581837	11/07/2007					
RQ	M2	2		11/09/2007	4	27039562446	1/01/2007 1/31/2007					
RQ	M3	2		11/09/2007	5	27039562441	2/01/2007 2/28/2007					
RQ	M4	2		11/18/2007	5	27039563633	3/01/2007 3/31/2007					
RQ	M4	2		2/13/2008	3	28039689784	3/01/2007 3/31/2007					
RQ	M5	2		11/18/2007	4	28039581185	4/01/2007 4/30/2007					
RQ	M6	2		2/13/2008	4	28039632797	5/01/2007 5/31/2007					

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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		2/13/2008	3	28039633801	6/01/2007 6/30/2007					
RQ	M8	2		2/13/2008	4	28039653005	7/01/2007 7/31/2007					
RQ	M9	2		2/27/2008	3	28039644829	8/01/2007 8/31/2007					
RQ	M10	2		2/27/2008	4	28039644019	9/01/2007 9/30/2007					
RQ	M11	2		3/05/2008	3	28039651584	10/01/2007 10/31/2007					
RQ	M12	2		3/05/2008	4	28039651580	11/01/2007 11/30/2007					
3	M2	N	P	2/20/2007	124	27950089047	1/01/2007 1/31/2007	80433	215287	223993	60727	14941
3	M2	A	P	12/08/2007	121	27990994781	1/01/2007 1/31/2007	69433	218532	227238	60727	14941
3	M3	N	P	3/20/2007	149	27980358961	2/01/2007 2/28/2007	30727	353858	377962	67092	187911
3	M3	A	P	4/19/2007	144	27990012336	2/01/2007 2/28/2007	30727	356597	377552	70073	187911
3	M3	A	P	6/20/2007	145	27930830174	2/01/2007 2/28/2007	60727	386897	377552	70073	187911
3	M3	A	P	12/10/2007	139	27931641435	2/01/2007 2/28/2007	60727	386897	377552	70073	187911
3	M3	A	P	2/29/2008	139	28930737852	2/01/2007 2/28/2007	60727	386897	377552	70073	187911
3	M4	N	P	4/19/2007	140	27930863834	3/01/2007 3/31/2007	70073	355026	405572	22627	78857
3	M4	A	P	9/20/2007	158	27990163821	3/01/2007 3/31/2007	70073	350026	405572	22627	78857
3	M4	A	P	12/17/2007	189	27991028712	3/01/2007 3/31/2007	78073	358908	405572	22627	78857
3	M5	N	P	5/18/2007	137	27990089898	4/01/2007 4/30/2007	32527	298427	244151	77873	40128
3	M5	A	P	6/20/2007	138	27990163753	4/01/2007 4/30/2007	22527	298497	244151	77873	40128
3	M5	A	P	12/17/2007	139	27931668522	4/01/2007 4/30/2007	22527	298497	244151	77873	40128
3	M6	N	P	6/20/2007	173	27930830001	5/01/2007 5/31/2007	77873	339528	385838	31563	40128
3	M6	A	P	1/30/2008	172	28990159096	5/01/2007 5/31/2007	77873	339528	385838	31563	40128
3	M7	N	P	7/20/2007	155	27990337829	6/01/2007 6/30/2007	81983	518806	482529	59902	63218
3	M7	A	P	1/31/2008	153	28930290644	6/01/2007 6/30/2007	31563	510868	482529	59902	63218
3	M8	N	P	8/20/2007	187	27990514993	7/01/2007 7/31/2007	30962	324220	227588	56534	272410
3	M8	A	P	1/31/2008	166	28990258432	7/01/2007 7/31/2007	59902	324220	327588	56534	272410
3	M9	N	P	9/20/2007	126	27931213177	8/01/2007 8/31/2007	56534	242422	242201	56755	394548

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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
3		M9		A	P	1/31/2008		126	28930317022		8/01/2007	8/31/2007	56534		242422	242201	56755		394548	
3		M10		N	P	10/18/2007		221	27890847355		9/01/2007	9/30/2007	56755		471371	453074	75052		975089	
3		M10		A	P	1/31/2008		221	28930323297		9/01/2007	9/30/2007	56755		471371	453074	75052		318789	
3		M11		N	P	11/20/2007		135	27931611618		10/01/2007	10/31/2007	78852		281517	324258	32314		459432	
3		M11		A	P	1/31/2008		135	28990286194		10/01/2007	10/31/2007	75052		281517	324255	32314		459432	
3		M12		N	P	12/20/2007		205	27931688138		11/01/2007	11/30/2007	32314		282507	280779	34042		459565	
3		M12		A	P	1/31/2008		205	28990267028		11/01/2007	11/30/2007	32314		282509	280779	34044		459565	
3		M12		A	P	4/04/2008		205	28931059383		11/01/2007	11/30/2007	32314		282509	380779	34044		459565	
3		YE		N	P	1/31/2008		169	28930358656		12/01/2007	12/31/2007	34044		237314	188388	83169		590066	
3		M2		N	P	2/18/2008		168	28930592728		1/01/2008	1/31/2008	83169		335125	320474	97820		884980	
3		M3		N	P	3/19/2008		254	28930815011		2/01/2008	2/29/2008	97820		583723	553086	128458		705271	
3		M4		N	P	4/18/2008		160	28990877210		3/01/2008	3/31/2008	128458		353796	419259	62995		721329	
TOTAL															5225545	5231984				

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