

**REPORTS ANALYSIS DIVISION REFERRAL**  
**TO**  
**ALTERNATIVE DISPUTE RESOLUTION OFFICE**

**DATE:** July 21, 2017

**ANALYST:** Kaitlin Seufert

**I. COMMITTEE:**

Colorado Republican Committee  
(C00033134)  
Marty Neilson, Treasurer (11/20/15-  
Present)  
Robert Balink, Treasurer (5/9/14-  
11/19/15)  
5950 S Willow Drive, Suite 302  
Greenwood Village, CO 80111

**II. RELEVANT STATUTE:**

52 U.S.C. §30104(b)(2)  
11 CFR §104.3 (a)

**III. BACKGROUND:**

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

Colorado Republican Committee ("the Committee") amended its 2016 12 Day Pre-General Report to disclose additional receipts totaling \$132,560.00, which were not disclosed on the original report (Attachment 2).

On October 27, 2016, the Committee filed the original 2016 12 Day Pre-General Report covering the period from October 1, 2016 through October 19, 2016. The report disclosed \$378,810.00 in receipts on Line 12 (Transfers from Affiliated/Other Party Committees) of the Detailed Summary Page (Image 201610279036937641).

On January 31, 2017, the Committee filed an Amended 2016 12 Day Pre-General Report. The Report disclosed \$511,370.00 in receipts on Line 12 of the Detailed Summary Page, an increase of \$132,560.00 from the original report (Image 201701319042380211).

On April 16, 2017, a Request for Additional Information ("RFAI") was sent to the Committee referencing the Amended 2016 12 Day Pre-General Report, received January 31, 2017. The RFAI requested clarification regarding the substantial increase in receipts disclosed on the Amended 2016 12 Day Post-General Report (Image 201704160300084632).

On June 5, 2017, the Reports Analysis Division (RAD) Analyst called Mike McCauley, consultant for the Committee. The Analyst stated that the Committee had failed to provide a response to the RFAI for the Amended 12 Day Pre-General Report, received January 31, 2017. The Analyst further explained that the substantial increase in activity is an issue that could be referred for further action. Mr. McCauley stated that he had been traveling and was working on the responses. The Analyst advised the Committee to file their response within one week (Attachment 3).

On June 15, 2017 and June 21, 2017, The Analyst spoke with Mr. McCauley. Among other issues, the Analyst reminded the Committee that their response to the RFAI for the Amended 12 Day Pre-General Report, received January 31, 2017, was still outstanding. The Analyst encouraged the Committee to file the response as soon as possible (Attachment 3).

On June 22, 2017, the Committee filed a Miscellaneous Electronic Submission ("FEC Form 99") in response to the RFAI referencing the Amended 2016 12 Day Pre-General Report, received January 31, 2017. The Committee stated:

"We are in receipt of your letter dated April 16, 2017 regarding our amended 12 Day Pre General report in which our receipts increased by \$132,560 from the originally filed report. This increase is a result of a transfer made from the RNC that was not included in the financial records of the party until a bank reconciliation was performed. That reconciliation, performed in the normal course of business at the end of the month, was after the reporting period making and ammendment necessary" (Image 201706229065072450).

To date, no further communications have been received from the Committee regarding this matter.

| O-Index (2017-2018)                                                                                       |        |     |           |     |                     |            |            |             |            |           |           |           |        |       |                |
|-----------------------------------------------------------------------------------------------------------|--------|-----|-----------|-----|---------------------|------------|------------|-------------|------------|-----------|-----------|-----------|--------|-------|----------------|
| Cmte. ID: C00033134    Cmte. Name: COLORADO REPUBLICAN COMMITTEE                                          |        |     |           |     |                     |            |            |             |            |           |           |           |        |       |                |
| Treasurer Name: NEILSON, MARTY    Address: 5950 S. WILLOW DRIVE SUITE 302, GREENWOOD VILLAGE, CO 80111    |        |     |           |     |                     |            |            |             |            |           |           |           |        |       |                |
| Cmte. Type: Y (QUALIFIED PARTY)    Cmte. Designation: U (UNAUTHORIZED)    Filing Frequency: MONTHLY FILER |        |     |           |     |                     |            |            |             |            |           |           |           |        |       |                |
| Form Tr                                                                                                   | Rpt Tr | Avl | Recpt Dt  | Pgs | Begin Img#          | Beg Cvg Dt | End Cvg Dt | Ltr Mail Dt | Begin Cash | Receipts  | Disb      | End Cash  | Debits | Loans | Debits & Loans |
| MS-T                                                                                                      |        |     | 6/22/2017 | 1   | 201706220605072450  |            |            |             |            |           |           |           |        |       |                |
| MS-T                                                                                                      |        |     | 6/22/2017 | 1   | 201706220605080580  |            |            |             |            |           |           |           |        |       |                |
| F3XN                                                                                                      | M2     | N   | 2/20/2017 | 23  | 2017022005049745379 | 1/1/2017   | 1/31/2017  |             | \$133,883  | \$98,092  | \$54,451  | \$177,524 |        |       | \$0            |
| F3XN                                                                                                      | M3     | N   | 3/20/2017 | 19  | 2017032005050560122 | 2/1/2017   | 2/28/2017  |             | \$177,524  | \$50,364  | \$36,599  | \$191,288 |        |       | \$0            |
| F3XN                                                                                                      | M4     | N   | 4/20/2017 | 28  | 2017042005052365406 | 3/1/2017   | 3/31/2017  |             | \$191,289  | \$87,612  | \$51,886  | \$227,015 |        |       | \$0            |
| F3XN                                                                                                      | M5     | N   | 5/19/2017 | 42  | 2017051905054067132 | 4/1/2017   | 4/30/2017  |             | \$227,015  | \$33,251  | \$51,007  | \$209,259 |        |       | \$0            |
| F3XN                                                                                                      | M6     | N   | 6/20/2017 | 25  | 201706200505070572  | 5/1/2017   | 5/31/2017  |             | \$209,259  | \$52,475  | \$58,419  | \$203,316 |        |       | \$0            |
| Totals                                                                                                    |        |     |           |     |                     |            |            |             | \$331,797  | \$321,797 | \$252,364 |           |        |       |                |

| O-Index (2015-2016)                                                                                 |        |     |            |     |                     |            |            |             |            |           |           |           |           |           |                |
|-----------------------------------------------------------------------------------------------------|--------|-----|------------|-----|---------------------|------------|------------|-------------|------------|-----------|-----------|-----------|-----------|-----------|----------------|
| Cmte. ID: C00033134 Cmte. Name: COLORADO REPUBLICAN COMMITTEE                                       |        |     |            |     |                     |            |            |             |            |           |           |           |           |           |                |
| Treasurer Name: NEILSON, MARTY Address: 5950 S. WILLOW DRIVE SUITE 302, GREENWOOD VILLAGE, CO 80111 |        |     |            |     |                     |            |            |             |            |           |           |           |           |           |                |
| Cmte. Type: Y (QUALIFIED PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: MONTHLY FILER |        |     |            |     |                     |            |            |             |            |           |           |           |           |           |                |
| Form Tr                                                                                             | Rpt Tr | Avl | Recpt Dt   | Pgs | Begin Img#          | Beg Cvg Dt | End Cvg Dt | Ltr Mail Dt | Begin Cash | Receipts  | Disb      | End Cash  | Debits    | Loans     | Debits & Loans |
| MS-T                                                                                                |        |     | 7/22/2015  | 17  | 201507220300012735  | 1/1/2015   | 1/31/2015  |             |            |           |           |           |           |           |                |
| MS-T                                                                                                |        |     | 7/22/2015  | 17  | 201507220300012717  | 2/1/2015   | 2/28/2015  |             |            |           |           |           |           |           |                |
| MS-T                                                                                                |        |     | 8/11/2015  | 1   | 201509110001637054  |            |            |             |            |           |           |           |           |           |                |
| MS-T                                                                                                |        |     | 3/7/2016   | 1   | 2016030700009681648 |            |            |             |            |           |           |           |           |           |                |
| MS-T                                                                                                |        |     | 3/7/2016   | 1   | 2016030700009681655 |            |            |             |            |           |           |           |           |           |                |
| MS-T                                                                                                |        |     | 3/7/2016   | 1   | 2016030700009681656 |            |            |             |            |           |           |           |           |           |                |
| MS-T                                                                                                |        |     | 9/28/2016  | 1   | 201609280032141772  |            |            |             |            |           |           |           |           |           |                |
| MS-T                                                                                                |        |     | 9/28/2016  | 1   | 201609280032142488  |            |            |             |            |           |           |           |           |           |                |
| RQ2                                                                                                 | M2     | N   | 6/17/2015  | 2   | 15330083817         | 1/1/2015   | 1/31/2015  | 6/17/2015   |            |           |           |           |           |           |                |
| RQ2                                                                                                 | M3     | A   | 1/31/2016  | 2   | 201601310300009884  | 2/1/2015   | 2/28/2015  | 1/31/2016   |            |           |           |           |           |           |                |
| RQ2                                                                                                 | M3     | N   | 6/25/2015  | 2   | 15330084010         | 2/1/2015   | 2/28/2015  | 8/25/2015   |            |           |           |           |           |           |                |
| RQ2                                                                                                 | M3     | A   | 8/4/2015   | 2   | 201508040300001547  | 2/1/2015   | 2/28/2015  | 8/4/2015    |            |           |           |           |           |           |                |
| RQ2                                                                                                 | M9     | A   | 2/2/2016   | 2   | 201602020300010104  | 8/1/2015   | 8/31/2015  | 2/2/2016    |            |           |           |           |           |           |                |
| RQ2                                                                                                 | YE     | N   | 2/16/2016  | 2   | 2016021603000035483 | 12/1/2015  | 12/31/2015 | 2/16/2016   |            |           |           |           |           |           |                |
| RQ2                                                                                                 | M2     | N   | 4/14/2016  | 2   | 201604140300041634  | 1/1/2016   | 1/31/2016  | 4/14/2016   |            |           |           |           |           |           |                |
| RQ2                                                                                                 | M2     | A   | 8/24/2016  | 4   | 201608240300057522  | 1/1/2016   | 1/31/2016  | 8/24/2016   |            |           |           |           |           |           |                |
| RQ2                                                                                                 | M4     | A   | 8/24/2016  | 2   | 201608240300057477  | 3/1/2016   | 3/31/2016  | 8/24/2016   |            |           |           |           |           |           |                |
| RQ2                                                                                                 | 12G    | A   | 4/16/2017  | 2   | 201704160300084632  | 10/1/2016  | 10/19/2016 | 4/16/2017   |            |           |           |           |           |           |                |
| RQ2                                                                                                 | 30G    | A   | 4/16/2017  | 4   | 201704160300084622  | 10/20/2016 | 11/28/2016 | 4/16/2017   |            |           |           |           |           |           |                |
| RQ2                                                                                                 | YE     | N   | 4/16/2017  | 2   | 201704160300084592  | 11/29/2016 | 12/31/2016 | 4/16/2017   |            |           |           |           |           |           |                |
| F3XN                                                                                                | M2     | N   | 2/20/2015  | 36  | 159508202553        | 1/1/2015   | 1/31/2015  |             | \$145,283  | \$180,190 | \$112,046 | \$183,427 | \$60,000  | \$60,000  | \$0            |
| F3XA                                                                                                | M2     | A   | 7/17/2015  | 36  | 201507170000265688  | 1/1/2015   | 1/31/2015  |             | \$145,283  | \$220,190 | \$112,046 | \$253,427 | \$120,000 | \$120,000 | \$60,000       |
| F3XA                                                                                                | M2     | A   | 11/20/2015 | 37  | 2015112009003417885 | 1/1/2015   | 1/31/2015  |             | \$8,976    | \$220,190 | \$112,046 | \$117,119 | \$60,990  | \$60,000  | \$120,990      |
| F3XN                                                                                                | M3     | N   | 9/20/2015  | 28  | 15951093742         | 2/1/2015   | 2/28/2015  |             | \$183,427  | \$91,883  | \$178,906 | \$106,404 |           |           | \$0            |
| F3XA                                                                                                | M3     | A   | 7/17/2015  | 32  | 201507170000265688  | 2/1/2015   | 2/28/2015  |             | \$253,427  | \$102,186 | \$178,906 | \$176,717 | \$70,312  | \$70,312  | \$143,911      |
| F3XA                                                                                                | M3     | A   | 1/20/2015  | 34  | 2015112009003419325 | 2/1/2015   | 2/28/2015  |             | \$117,119  | \$102,186 | \$178,906 | \$40,409  | \$70,312  | \$70,312  | \$143,911      |
| F3XN                                                                                                | M4     | N   | 4/20/2015  | 44  | 15970673576         | 3/1/2015   | 3/31/2015  |             | \$106,404  | \$80,079  | \$113,779 | \$72,703  |           |           | \$0            |
| F3XN                                                                                                | M4     | A   | 7/17/2015  | 42  | 201507170000265688  | 3/1/2015   | 3/31/2015  |             | \$176,717  | \$80,079  | \$113,779 | \$143,016 |           |           | \$0            |
| F3XA                                                                                                | M4     | A   | 7/21/2015  | 45  | 201507210000352803  | 3/1/2015   | 3/31/2015  |             | \$176,717  | \$109,299 | \$113,779 | \$172,238 |           |           | \$70,312       |
| F3XA                                                                                                | M4     | A   | 1/20/2015  | 47  | 2015112009003419498 | 3/1/2015   | 3/31/2015  |             | \$40,409   | \$109,299 | \$113,779 | \$35,928  | \$70,312  | \$70,312  | \$148,380      |
| F3XN                                                                                                | M5     | N   | 5/20/2015  | 34  | 15951415856         | 4/1/2015   | 4/30/2015  |             | \$72,703   | \$108,197 | \$90,231  | \$80,659  |           |           | \$0            |

| O-Index (2013-2014)             |    |    |    |     |       |    |      |      |       |   |     |     |    |                                                                      |     |     |    |     |      |    |      |      |         |      |     |      |        |       |                |
|---------------------------------|----|----|----|-----|-------|----|------|------|-------|---|-----|-----|----|----------------------------------------------------------------------|-----|-----|----|-----|------|----|------|------|---------|------|-----|------|--------|-------|----------------|
| Cmte. ID: C00033134             |    |    |    |     |       |    |      |      |       |   |     |     |    | Cmte. Name: COLORADO REPUBLICAN COMMITTEE                            |     |     |    |     |      |    |      |      |         |      |     |      |        |       |                |
| Treasurer Name: NEILSON, MARTY  |    |    |    |     |       |    |      |      |       |   |     |     |    | Address: 5950 S. WILLOW DRIVE SUITE 302, GREENWOOD VILLAGE, CO 80111 |     |     |    |     |      |    |      |      |         |      |     |      |        |       |                |
| Cmte. Type: Y [QUALIFIED PARTY] |    |    |    |     |       |    |      |      |       |   |     |     |    | Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: MONTHLY FILER  |     |     |    |     |      |    |      |      |         |      |     |      |        |       |                |
| Form                            | Ip | Rq | To | Avl | Recpt | Dt | Pos. | Exam | Instr | # | Beg | Cva | Dt | I                                                                    | End | Cva | Dt | Ltr | Mall | Dt | Begm | Cash | Results | Disb | End | Cash | Debits | Loans | Debits & Loans |

[illegible]

[illegible]

Colorado Republican Committee (C00033134)  
2016 12 Day Pre-General Report/Amended 2016 12 Day Pre-General Report

Overview of Additional Receipts

| Report Line                                                      | 2016 12 Day Pre-General<br>(Image<br>201610279036937641) | Amended 2016 12 Day<br>Pre-General, received<br>1/31/17<br>(Image<br>201701319042380211) | Variance<br>Amount |
|------------------------------------------------------------------|----------------------------------------------------------|------------------------------------------------------------------------------------------|--------------------|
| Line 12 (Transfers from<br>Affiliated/Other Party<br>Committees) | \$378,810.00                                             | \$511,370.00                                                                             | \$132,560.00       |
| Total Variance:                                                  |                                                          |                                                                                          | \$132,560.00       |