

21L-35

REPORTS ANALYSIS DIVISION REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: June 2, 2021

ANALYST: Sarah Vivian

- I. COMMITTEE: Hawaii Republican Party
C00085506
Stephen C. Holck, Treasurer
725 Kapiolani Blvd.
Ste C105
Honolulu, HI 96813
- II. RELEVANT STATUTE: 52 U.S.C. § 30104(b)(2) and (4)
11 CFR § 104.3(a) and (b)

III. BACKGROUND:

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

Hawaii Republican Party (“the Committee”) amended its 2020 30-Day Post-General Report to disclose additional receipts totaling \$1,579,818.99 and additional disbursements totaling \$1,579,818.99, which were not disclosed in the original report. The Committee also amended its 2020 Year-End Report to disclose additional receipts totaling \$116,490.15 and additional disbursements totaling \$116,490.15, which were not disclosed in the original report (Attachment 2).

2020 30-Day Post-General Report

On December 3, 2020, the Committee filed the original 2020 30-Day Post-General Report covering the period from October 15, 2020 through November 23, 2020. The report disclosed \$51,250.00 in receipts on Line 12 (Transfers from Affiliated/Other Party Committees) of the Detailed Summary Page (Image 202012039338331569, Attachment 2). The report also disclosed \$0.00 in disbursements on Line 22 (Transfers to Affiliated/Other Party Committees) of the Detailed Summary Page (Image 202012039338331570, Attachment 2).

On February 28, 2021, the Committee filed an Amended 2020 30-Day Post-General Report. The report disclosed \$1,631,068.99 in receipts on Line 12 of the Detailed Summary Page, an increase in receipts of \$1,579,818.99 from the original report (Image 202102289429110727, Attachment 2). The report also disclosed \$1,579,818.99 in disbursements on Line 22 of the Detailed Summary Page, an increase of \$1,579,818.99 from the original report (Image 202102289429110728, Attachment 2). Additionally, the report included memo text stating in part:

“Amended to include JF transfers and associated memos as well as corresponding transfers to the RNC. These transactions were initially not reported due to a misunderstanding regarding reporting requirements and responsibilities” (Image 202102289429110730).

On March 21, 2021, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2020 30-Day Post-General Report, received February 28, 2021. The RFAI referenced the memo text attached to the report and requested additional clarification regarding the substantial increase in receipts and disbursements disclosed in the Amended 2020 30-Day Post-General Report (Images 202103210300113378-79).

2020 Year-End Report

On January 30, 2021, the Committee filed the original 2020 Year-End Report covering the period from November 24, 2020 through December 31, 2020. The Report disclosed \$0.00 on Line 12 of the Detailed Summary Page (Image 202101309418335438, Attachment 2). The report also disclosed \$0.00 on Line 22 of the Detailed Summary Page (Image 202101309418335439, Attachment 2).

On February 28, 2021, the Committee filed an Amended 2020 Year-End Report. The report disclosed \$116,490.15 on Line 12 of the Detailed Summary Page, an increase in receipts of \$116,490.15 from the original report (Image 202102289429110957, Attachment 2). The report also disclosed \$116,490.15 in disbursements on Line 22 of the Detailed Summary Page, an increase of \$116,490.15 from the original report (202102289429110958, Attachment 2). Additionally, the report included memo text stating in part:

“Amended to include JF transfer, associated memos, and corresponding transfer to the RNC. These transactions were initially not reported due to a misunderstanding regarding reporting requirements and responsibilities” (Image 202102289429110960).

On March 21, 2021, an RFAI was sent to the Committee referencing the Amended 2020 Year-End Report, received February 28, 2021. The RFAI referenced the memo text attached to the report and requested additional clarification regarding the substantial increase in receipts and disbursements disclosed in the Amended 2020 Year-End Report (Images 202103210300113380-81).

On April 27, 2021, the Reports Analysis Division (RAD) Analyst called Mimi Taylor, a representative for the Committee. The RAD Analyst explained that the increases in receipts and disbursements on the Amended 2020 30-Day Post-General Report and Amended 2020 Year-End Report, both received February 28, 2021, may be referred to another Commission office for potential further action. The Analyst told Ms. Taylor that the Committee could provide additional clarification for the public record if it wished to do so (Attachment 3).

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

O-Index (2021-2022)															
Cmte. ID: C00085506 Cmte. Name: HAWAII REPUBLICAN PARTY															
Treasurer Name: HOLCK, STEPHEN C. Address: 725 KAPIOLANI BLVD STE C105, HONOLULU, HI 96813															
Cmte. Type: Y (QUALIFIED PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY 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	Debts	Loans	Debts & Loans
MS-M			1/30/2021	1	202101309418335411				-	-	-	-	-	-	-
MS-O			2/3/2021	2	202102030300104231				-	-	-	-	-	-	-
MS-T			4/26/2021	1	202104269445376803				-	-	-	-	-	-	-
F1A		A	2/24/2021	6	202102249428820120				-	-	-	-	-	-	-
Totals										\$0		\$0			

O-Index (2019-2020)															
Cmte. ID: C00085506 Cmte. Name: HAWAII REPUBLICAN PARTY															
Treasurer Name: HOLCK, STEPHEN C. Address: 725 KAPIOLANI BLVD STE C105, HONOLULU, HI 96813															
Cmte. Type: Y (QUALIFIED PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltrr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			4/24/2019	1	201904249149584293				-	-	-	-	-	-	-
MS-T			1/6/2020	1	202001069167022756				-	-	-	-	-	-	-
RQ2	M11	N	12/1/2019	2	201912010300052511	10/1/2019	10/31/2019	12/1/2019							
RQ2	30G	A	3/21/2021	2	202103210300113378	10/15/2020	11/23/2020	3/21/2021							
RQ2	YE	A	3/21/2021	2	202103210300113380	11/24/2020	12/31/2020	3/21/2021							
F3XN	M2	N	2/20/2019	11	201902209145552665	1/1/2019	1/31/2019		\$14,146	\$529	\$6,450	\$8,225	-	-	\$0
F3XN	M3	N	3/20/2019	8	201903209145882665	2/1/2019	2/28/2019		\$8,225	\$4,278	\$5,422	\$7,082	-	-	\$0
F3XN	M4	N	4/18/2019	14	201904189149491815	3/1/2019	3/31/2019		\$7,082	\$7,865	\$4,473	\$10,473	-	-	\$0
F3XN	M5	N	5/20/2019	42	201905209149810104	4/1/2019	4/30/2019		\$10,473	\$58,156	\$27,572	\$41,057	-	-	\$0
F3XN	M6	N	6/20/2019	16	201906209150156772	5/1/2019	5/31/2019		\$41,057	\$9,523	\$7,380	\$43,200	-	-	\$0
F3XN	M7	N	7/15/2019	19	201907159150820941	6/1/2019	6/30/2019		\$43,200	\$3,928	\$7,600	\$39,527	-	-	\$0
F3XN	M8	N	8/20/2019	21	201908209162996514	7/1/2019	7/31/2019		\$39,527	\$7,066	\$8,734	\$37,859	-	-	\$0
F3XN	M9	N	9/19/2019	18	201909199163418412	8/1/2019	8/31/2019		\$37,859	\$8,342	\$15,160	\$31,040	-	-	\$0
F3XN	M10	N	10/17/2019	16	201910179165008082	9/1/2019	9/30/2019		\$31,040	\$1,775	\$8,105	\$24,710	-	-	\$0
F3XN	M11	N	11/20/2019	20	201911209165668477	10/1/2019	10/31/2019		\$24,710	\$12,574	\$7,458	\$29,825	-	-	\$0
F3XN	M12	N	12/20/2019	21	201912209166631631	11/1/2019	11/30/2019		\$29,825	\$1,879	\$6,164	\$25,539	-	-	\$0
F3XN	YE	N	1/31/2020	36	202001319185093274	12/1/2019	12/31/2019		\$25,539	\$3,308	\$12,381	\$16,467	-	-	\$0
F3XN	M2	N	2/20/2020	14	202002209186905181	1/1/2020	1/31/2020		\$16,467	\$2,001	\$5,362	\$13,105	-	-	\$0
F3XN	M3	N	3/20/2020	71	202003209204652832	2/1/2020	2/29/2020		\$13,105	\$10,695	\$12,051	\$11,749	-	-	\$0
F3XN	M4	N	4/20/2020	53	202004209220099741	3/1/2020	3/31/2020		\$11,749	\$2,514	\$6,572	\$7,691	-	-	\$0
F3XN	M5	N	5/19/2020	94	202005199232795037	4/1/2020	4/30/2020		\$7,691	\$6,008	\$6,657	\$7,042	\$4,650	-	\$4,650
F3XN	M6	N	6/19/2020	154	202006199240081770	5/1/2020	5/31/2020		\$7,042	\$12,546	\$9,033	\$10,556	\$3,100	-	\$3,100
F3XN	M7	N	7/19/2020	124	202007199250407551	6/1/2020	6/30/2020		\$10,556	\$9,833	\$11,513	\$8,875	\$0	-	\$0
F3XN	M8	N	8/20/2020	97	202008209261716752	7/1/2020	7/31/2020		\$8,875	\$8,535	\$9,935	\$7,475	-	-	\$0
F3XN	M9	N	9/20/2020	149	202009209275580258	8/1/2020	8/31/2020		\$7,475	\$14,401	\$10,373	\$11,503	-	-	\$0
F3XN	M10	N	10/20/2020	205	202010209298239741	9/1/2020	9/30/2020		\$11,503	\$11,607	\$10,780	\$12,330	-	-	\$0
F3XN	12G	N	10/22/2020	84	202010229332720824	10/1/2020	10/14/2020		\$12,330	\$3,834	\$5,216	\$10,948	-	-	\$0
F3XN	30G	N	12/3/2020	159	202012039338331567	10/15/2020	11/23/2020		\$10,948	\$68,760	\$63,608	\$16,099	-	-	\$0
F3XA	30G	A	2/28/2021	230	202102289429110725	10/15/2020	11/23/2020		\$10,948	\$1,648,579	\$1,643,427	\$16,099	-	-	\$0
F3XN	YE	N	1/30/2021	43	202101309418335436	11/24/2020	12/31/2020		\$16,099	\$1,444	\$12,269	\$5,274	-	-	\$0
F3XA	YE	A	2/28/2021	51	202102289429110955	11/24/2020	12/31/2020		\$16,099	\$117,934	\$128,760	\$5,274	-	-	\$0
F1A		A	2/12/2019	6	201902129145505365				-	-	-	-	-	-	-
F1A		A	2/20/2019	6	201902209145535286				-	-	-	-	-	-	-

FJA	A	5/24/2019	6	201905249149836151	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FJA	A	6/19/2019	6	201906199150100674					-	-	-	-	-	-	-	-	-	-	-
FJA	A	6/19/2020	4	202006199240081717					-	-	-	-	-	-	-	-	-	-	-
Totals															\$1,967,719	\$1,976,591			

O-Index (2017-2018)															
Cmte. ID: C00085506 Cmte. Name: HAWAII REPUBLICAN PARTY															
Treasurer Name: HOLCK, STEPHEN C. Address: 725 KAPIOLANI BLVD STE C105, HONOLULU, HI 96813															
Cmte. Type: Y (QUALIFIED PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY 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	Debts	Loans	Debts & Loans
RQ2	M8	N	10/11/2018	2	201810110300021366	7/1/2018	7/31/2018	10/11/2018	-	-	-	-	-	-	-
RQ2	YE	N	4/4/2019	2	201904040300036559	11/27/2018	12/31/2018	4/4/2019							
F3XN	M2	N	2/17/2017	20	201702179049717623	1/1/2017	1/31/2017		\$75,254	\$14,634	\$20,088	\$69,800	-	-	\$0
F3XN	M3	N	3/16/2017	15	201703169050871386	2/1/2017	2/28/2017		\$69,800	\$1,147	\$15,974	\$54,973	-	-	\$0
F3XN	M4	N	4/13/2017	14	201704139052087766	3/1/2017	3/31/2017		\$54,973	\$14,729	\$10,879	\$58,823	-	-	\$0
F3XN	M5	N	5/10/2017	18	201705109053515191	4/1/2017	4/30/2017		\$58,823	\$9,527	\$16,840	\$51,509	-	-	\$0
F3XN	M6	N	6/19/2017	15	201706199061016651	5/1/2017	5/31/2017		\$51,509	\$5,266	\$11,536	\$45,240	-	-	\$0
F3XN	M7	N	7/19/2017	21	201707199066807119	6/1/2017	6/30/2017		\$45,240	\$7,787	\$26,834	\$26,194	-	-	\$0
F3XN	M8	N	8/19/2017	18	201708199070471598	7/1/2017	7/31/2017		\$26,194	\$8,172	\$11,763	\$22,602	-	-	\$0
F3XN	M9	N	9/19/2017	22	201709199074767637	8/1/2017	8/31/2017		\$22,602	\$14,694	\$14,108	\$23,189	-	-	\$0
F3XA	M9	A	1/11/2018	22	201801119090392479	8/1/2017	8/31/2017		\$22,602	\$14,701	\$14,108	\$23,195	-	-	\$0
F3XN	M10	N	10/19/2017	27	201710199075814591	9/1/2017	9/30/2017		\$23,195	\$46,976	\$7,363	\$62,808	-	-	\$0
F3XN	M11	N	11/20/2017	50	201711209086760990	10/1/2017	10/31/2017		\$62,808	\$58,483	\$11,686	\$109,604	-	-	\$0
F3XN	M12	N	12/18/2017	21	201712189089218212	11/1/2017	11/30/2017		\$109,604	\$15,016	\$46,770	\$77,851	-	-	\$0
F3XN	YE	N	1/31/2018	20	201801319091062129	12/1/2017	12/31/2017		\$77,851	\$11,347	\$11,034	\$78,164	-	-	\$0
F3XN	M2	N	2/20/2018	16	201802209094611842	1/1/2018	1/31/2018		\$78,164	\$8,573	\$12,696	\$74,041	-	-	\$0
F3XA	M2	A	3/15/2018	16	201803159096560622	1/1/2018	1/31/2018		\$78,164	\$8,573	\$12,696	\$74,041	-	-	\$0
F3XN	M3	N	3/20/2018	14	201803209096651151	2/1/2018	2/28/2018		\$74,041	\$2,198	\$19,399	\$56,841	-	-	\$0
F3XN	M4	N	4/20/2018	19	201804209111674218	3/1/2018	3/31/2018		\$56,841	\$22,206	\$21,120	\$57,926	-	-	\$0
F3XN	M5	N	5/18/2018	24	201805189112135895	4/1/2018	4/30/2018		\$57,926	\$47,953	\$40,136	\$65,744	-	-	\$0
F3XN	M6	N	6/20/2018	22	201806209114165976	5/1/2018	5/31/2018		\$65,744	\$25,951	\$26,440	\$65,255	-	-	\$0
F3XN	M7	N	7/20/2018	27	201807209119256683	6/1/2018	6/30/2018		\$65,255	\$28,883	\$36,125	\$58,014	-	-	\$0
F3XA	M7	A	8/20/2018	28	201808209121460448	6/1/2018	6/30/2018		\$65,255	\$35,133	\$36,125	\$64,264	-	-	\$0
F3XN	M8	N	8/20/2018	26	201808209121460514	7/1/2018	7/31/2018		\$64,264	\$28,197	\$40,899	\$51,563	-	-	\$0
F3XA	M8	A	11/14/2018	26	201811149133679561	7/1/2018	7/31/2018		\$64,264	\$28,197	\$40,899	\$51,563	-	-	\$0
F3XN	M9	N	9/19/2018	19	201809199121966527	8/1/2018	8/31/2018		\$51,563	\$29,828	\$17,345	\$64,046	-	-	\$0
F3XN	M10	N	10/19/2018	34	201810199125786011	9/1/2018	9/30/2018		\$64,046	\$32,131	\$18,568	\$77,608	-	-	\$0
F3XA	M10	A	10/20/2018	34	201810209125959717	9/1/2018	9/30/2018		\$64,046	\$32,131	\$18,568	\$77,608	-	-	\$0
F3XN	12G	N	10/24/2018	17	201810249130856900	10/1/2018	10/17/2018		\$77,608	\$13,673	\$21,397	\$69,885	-	-	\$0
F3XN	30G	N	12/6/2018	31	201812069134786534	10/18/2018	11/26/2018		\$69,885	\$29,490	\$84,740	\$14,634	-	-	\$0
F3XN	YE	N	1/31/2019	17	201901319145315772	11/27/2018	12/31/2018		\$14,634	\$7,497	\$7,985	\$14,146	-	-	\$0
F1A		A	6/8/2017	6	201706089056333353				-	-	-	-	-	-	-
Totals										\$490,627	\$551,735				

Hawaii Republican Party (C00085506)

2020 30-Day Post-General Report/Amended 2020 30-Day Post-General Report

Overview of Additional Receipts and Disbursements

Report Line	Original 2020 30-Day Post-General Report (Images 202012039338331569- 70)	Amended 2020 30-Day Post-General Report, Received 2/28/2021 (Images 202102289429110727- 28)	Variance Amount
Receipts			
Line 12: Transfers from Affiliated/Other Party Committees	\$51,250.00	\$1,631,068.99	\$1,579,818.99
Disbursements			
Line 22: Transfers to Affiliated/Other Party Committees	\$0.00	\$1,579,818.99	\$1,579,818.99

Hawaii Republican Party (C00085506)

2020 Year-End Report/Amended 2020 Year-End Report

Overview of Additional Receipts and Disbursements

Report Line	Original 2020 Year-End Report (Images 202101309418335438- 39)	Amended 2020 Year-End Report, Received 2/28/21 (Images 202102289429110957 -58)	Variance Amount
Receipts			
Line 12: Transfers from Affiliated/Other Party Committees	\$0.00	\$116,490.15	\$116,490.15
Disbursements			
Line 22: Transfers to Affiliated/Other Party Committees	\$0.00	\$116,490.15	\$116,490.15