



# Draft Final Audit Report of the Audit Division on the Ohio Republican Party State Central & Executive Committee

(January 1, 2007 - December 31, 2008)

## Why the Audit Was Done

Federal law permits the Commission to conduct audits and field investigations of any political committee that is required to file reports under the Federal Election Campaign Act (the Act). The Commission generally conducts such audits when a committee appears not to have met the threshold requirements for substantial compliance with the Act. The Commission determines whether the committee complied with the limitations, prohibitions, and disclosure requirements of the Act.

## Future Action

The Commission may initiate an enforcement action, at a later time, with respect to the matter discussed in this report.

## About the Committee

The Ohio Republican Party State Central & Executive Committee is a state party committee headquartered in Columbus, Ohio. For more information, see the Attachment Committee Organization, p. 2.

## Financial Activity

<b>Receipts</b>	
○ Contributions from Individuals	\$ 3,058,229
○ Contributions from Political Committees	1,666,512
○ Contributions from Affiliates	11,851,559
○ Transfers from Non-Federal Accounts	2,385,909
○ Office/Other Receipts	1,310,775
<b>Total Receipts</b>	<b>\$ 20,272,984</b>
<b>Disbursements</b>	
○ Operating Expenditures	\$ 5,304,397
○ Refunds of Contributions	1,747,000
○ Independent Expenditures	50,000
○ Coordinated Expenditures	13,003
○ Federal Election Activity	10,710,668
○ Other Disbursements	1,345,414
<b>Total Disbursements</b>	<b>\$ 19,170,482</b>

## Finding and Recommendation (p. 3)

- Reporting of Debts and Obligations

<sup>1</sup> 2 U.S.C. §438(b).

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# Table of Contents

	<b>Page</b>
<b>Part I. Background</b>	
Authority for Audit	1
Scope of Audit	1
<b>Part II. Overview of Committee</b>	
Committee Organization	2
Overview of Financial Activity	2
<b>Part III. Summary</b>	
Finding and Recommendation	3
<b>Part IV. Finding and Recommendation</b>	
Reporting of Debts and Obligations	4

# Part I

## Background

### Authority for Audit

This report is based on an audit of the Ohio Republican Party State Central & Executive Committee (ORP), undertaken by the Audit Division of the Federal Election Commission (the Commission) in accordance with the Federal Election Campaign Act of 1971, as amended (the Act). The Audit Division conducted the audit pursuant to 2 U.S.C. §438(b), which permits the Commission to conduct audits and field investigations of any political committee that is required to file a report under 2 U.S.C. §434. Prior to conducting any audit under this subsection, the Commission must perform an internal review of reports filed by selected committees to determine if the reports filed by a particular committee meet the threshold requirements for substantial compliance with the Act. 2 U.S.C. §438(b).

### Scope of Audit

Following Commission approved procedures, the Audit Division evaluated various risk factors and as a result, this audit examined:

1. The disclosure of individual contributors' occupational and name of employer.
2. The disclosure of disbursements, including obligations.
3. The disclosure of expenses allocated to federal and non-federal accounts.
4. The consistency between reported figures and actual figures.
5. The completeness of the records.
6. Other committee operations necessary to the review.

## Part II Overview of Committee

### Committee Organization

<b>Important Dates</b>	
• Date of Registration	October 5, 1982
• Audit Coverage	January 1, 2007 - December 31, 2008
<b>Headquarters</b>	
Columbus, Ohio	
<b>Bank Information</b>	
• Bank Depositories	Two
• Bank Accounts	10 Federal, Six Non-federal
<b>Treasurer</b>	
• Treasurer When Audit Was Conducted	Mr. Paul Hoag January 23, 2007 - present (attached to this report)
• Treasurer During Period Covered by Audit	Ms. Susan Brown January 28, 1999 - January 23, 2007
<b>Management Information</b>	
• Attended FEC Campaign Finance Seminar	Yes
• Who Handled Accounting and Recordkeeping Tasks	Paul Hoag

### Overview of Financial Activity (Audited Amounts)

Cash on hand @ January 1, 2007	\$ 172,248
<b>Receipts</b>	
o Contributions from Individuals	3,058,229
o Contributions from Political Committees	1,666,512
o Transfers from Affiliates	11,851,559
o Transfers from Non-federal Accounts	2,385,909
o Offsets/Other Receipts	1,310,775
<b>Total Receipts</b>	<b>\$ 20,272,984</b>
<b>Disbursements</b>	
o Operating Expenditures	5,304,397
o Refunds of Contributions	1,747,000
o Independent Expenditures	50,000
o Coordinated Expenditures	13,003
o Federal Election Activity	10,710,668
o Other Disbursements	1,345,414
<b>Total Disbursements</b>	<b>\$ 19,170,482</b>
Cash on hand @ December 31, 2008	\$ 1,274,750

## **Part III Summary**

### **Finding and Recommendation**

#### **Reporting of Debts and Obligations**

Audit fieldwork identified debts to five vendors that ORP failed to report. The debts totaled \$1,195,892. In response to the Interim Audit Report recommendation, ORP amended its reports to disclose these debts. (For more detail see p. 4)

## Part IV

# Finding and Recommendation

### Reporting of Debts and Obligations

#### Summary

Audit fieldwork identified debts to five vendors that ORP failed to report. The debts totaled \$1,195,892. In response to the Interim Audit Report recommendation, ORP amended its reports to disclose these debts.

#### Legal Standard

**A. Continuous Reporting Required.** A political committee must disclose the amount and nature of outstanding debts and obligations until those debts are extinguished. 2 U.S.C §434(b)(8) and 11 CFR §§104.3(d) and 104.11(a).

**B. Separate Schedules.** A political committee must file separate schedules for debts owed by and to the committee with a statement explaining the circumstances and conditions under which each debt and obligation was incurred or extinguished. 11 CFR §104.11(a).

#### C. Itemizing Debts and Obligations.

- Once it has been outstanding 60 days from the date incurred, a debt of \$500 or less must be reported on the next regularly scheduled report.
- A debt exceeding \$500 must be disclosed in the report that covers the date on which the debt was incurred. 11 CFR §104.11(b).

#### Facts and Analysis

##### A. Facts

Disclosure reports filed by ORP during the audit period did not disclose any debts owed. Although ORP paid the majority of invoices timely, it carried outstanding balances with five vendors that were not disclosed as debts. During audit fieldwork, a review of vendor invoices and computer files identified debts totaling \$1,195,892 that should have been disclosed on Schedule D (Debts and Obligations).<sup>2</sup> The vendors consistently invoiced ORP for the balance due. Some of the undisclosed debts were outstanding prior to the beginning of the audit period.

##### B. Interim Audit Report & Audit Division Recommendation

The Audit staff informed ORP representatives of this matter at the exit conference and provided schedules detailing the undisclosed debts for each reporting period for the audited cycle. ORP representatives indicated that amended reports would be filed.

<sup>2</sup> Each debt in this amount was counted once. In order for ORP to correctly file amended reports, the schedule provided included the amount of each debt required to be reported for each reporting period.

In the Interim Audit Report, the Audit staff recommended that ORP amend its reports to disclose the debts and obligations addressed above.

**C. Committee Response to Interim Audit Report**

In response to the Interim Audit Report, ORP filed amended reports disclosing the debts and obligations.