

**1. Submitting inconsistent documentation \$500**

A Campaign must obtain and furnish to the Board any information and/or documentation that the Board may request relating to the Campaign's expenditures. *See* Admin. Code §§ 3-703(1)(d), (g) and Board Rule 4-01(a).

The Campaign's two petty cash logs were inconsistent, as were some of its employment records. The Campaign has not explained the inconsistencies, and therefore CFB staff lacks sufficient assurance that the Campaign's employment records are accurate. The Board assessed a penalty of \$500 for this violation.

**2. Debit variance of 9.5% \$250**

Campaigns are required to report every disbursement they make. *See* Admin. Code § 3-703(6) and Board Rule 3-03. Campaigns are also required to provide the Board with bank records, including periodic bank statements. *See* Admin. Code §§ 3-703(1)(d), (g), and Board Rules 4-01(a) and (f).

There is a variance of \$11,084.86 between the total amount of disbursements reported by the Campaign (\$105,372.14), and the total amount of debits on the Campaign's bank statements (\$116,457.00). A large proportion of this 9.5% debit variance is caused by the Campaign's failure, in the months preceding the primary election, to report withdrawals from its bank account. Such reporting should have been timely. The Board assessed a penalty of \$250 for this violation.