

Allan W. Jennings, CD #28 (Special Election – November, 2010)

1. Failing to provide bank statements \$250

Campaigns are required to provide bank records, including periodic bank statements. *See* Admin. Code §§ 3-703(1)(d), (g), and Board Rules 4-01(a), (f).

The Campaign did not submit bank statements for the period from January 1, 2011 to December 31, 2011.

The Board assessed a penalty of \$250 for this violation.

2. Failing to accurately report disbursements and receipts \$1,000

Candidates must accurately report all Campaign disbursements and receipts. *See* Admin. Code §§ 3-703(1)(d), (g), (6), (11); Board Rules 3-03(c), (d), (e).

A review of the Campaign's bank records indicated a 37.10% variance (\$6,618.46) between reported disbursements and submitted documentation (\$24,458.60 in disbursements was reported but only \$17,840.14 was documented). The bank records also indicated a 26.67% (\$4,951) variance between reported receipts and submitted documentation (\$23,513 in receipts was reported but only \$18,562 was documented).

The Board assessed a penalty of \$1,000 for this violation.

3. Failing to report employment information for contributions in excess of \$99 \$400

Campaigns are required to report the occupation, employer, and business address of a contributor whose total contributions exceed \$99. *See* Admin. Code §§ 3-703(6)(a), (11), (12); Board Rules 3-03(c)(1), (6).

The Campaign did not provide the required employment information for 25 of 49 (51.02%) contributions in excess of \$99.

The Board assessed a penalty of \$400 for this violation.

4. Failing to document three transactions \$150

Candidates are required to document all transactions. *See* Admin. Code § 3-703(1)(d), (g), (11); Board Rule 4-01.

The Campaign failed to document three separate transactions with Priestly Taylor: 1) a \$2,000 loan received on October 26, 2010, 2) a \$1,000 loan repayment on November 5, 2010, and 3) a \$1,000 loan repayment on November 8, 2010.

The Board assessed a penalty of \$150 for these violations.

5. Maintaining a petty cash fund greater than \$500 \$195

Candidates may not maintain petty cash funds in excess of \$500. Board Rule 4-01(e)(2).

On October 27, 2010, the Campaign made a cash withdrawal of \$2,458, which exceeds the \$500 limit by \$1,958.

The Board assessed a penalty of \$195 for this violation.

6. Making cash payments greater than \$100 \$50

Candidates may not make cash expenditures in excess of \$100 per transaction or purchase. Board Rule 4-01(e)(2). Expenditures in excess of \$100 must be paid using a check from the Campaign's bank account. Board Rules 1-08(i), 4-01(e)(1).

The Campaign made a \$200 cash payment on November 1, 2010.

The Board assessed a penalty of \$50 for this violation.

7. Failing to respond to the notice of inadequate response to the Initial Request for Documentation \$224

Candidates must timely furnish any information the Board requests relating to campaign expenditures and contributions, including a response to post-election audit notices. *See* Admin. Code §§ 3-703(1)(d), (g), 3-710(1); Board Rule 4-05(a).

CFB staff sent the Campaign an initial request for documentation and records on January 28, 2011, and a Notice of Inadequate Response to the IDR on March 3, 2011. The Campaign did not respond.

The Board assessed a penalty of \$224 for this violation.

8. Failing to respond to Draft Audit Report \$224

Candidates must timely furnish any information the Board requests relating to campaign expenditures and contributions, including a response to post-election audit notices. *See* Admin. Code §§ 3-703(1)(d), (g), 3-710(1); Board Rule 4-05(a).

CFB staff sent the Campaign the Draft Audit Report on January 3, 2012. The Campaign requested and received an extension of the due date, but did not respond.

The Board assessed a penalty of \$224 for this violation.