

# Marco Rubio for US Senate

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April 11, 2015

Tyler Culberson  
Senior Campaign Finance Analyst  
Federal Election Commission  
c/o Secretary of the Senate  
232 Hart Senate Office Building  
Washington, DC 20510

ID Number: C00458844

Reference: April Quarterly Report (1/1/14-3/31/14)

Dear Mr. Culberson:

This letter is in response to your request for additional information, dated May 28, 2014. Please note that this letter was never received by the Committee. It was recently discovered while reviewing the Committee's filings on the FEC website.

1. Your letter indicates that the Committee disclosed one or more contributions that appear to exceed the limits set forth in the act. The Committee is aware of the contribution limits. In the case of an individual, if the contribution cannot be presumptively reattributed to a spouse or redesignated to a subsequent election, the Committee either sends a verified reattribution letter or refunds the excessive portion within 60 days of receipt. The Committee sends all presumptive reattribution and redesignation letters within 30 days of receipt and always gives the donor the option of making a change or requesting a refund. When the Committee receives contributions from other political committees that cause an excessive total, the Committee contacts the other political committee and requests a verified redesignation. If this is not received, the Committee issues a refund. The following is a response to each contributor listed in your letter:

Arthur Choate: The excessive portion of this contribution was returned to the Rubio Victory Committee and disclosed in the 9/30/14 distribution detail.

Cynthia Lautenbach: On 4/30/14, \$2500 of this contribution was redesignated to the 2016 General. This was disclosed on the July 2014 Quarterly Report.

Ned Lautenbach: On 4/30/14, \$2600 of this contribution was redesignated to the 2016 General. This was disclosed on the July 2014 Quarterly Report.

Daniel Murphy: The excessive portion of this contribution was returned to the Rubio Victory Committee and disclosed in the 6/30/14 distribution detail.

Maurice Perkins: On 4/16/14, \$1000 of this contribution was redesignated to the 2016 General. This was disclosed on the July 2014 Quarterly Report.

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## Marco Rubio for US Senate

Joseph Samora: On 5/30/14, \$2600 of this contribution was redesignated to the 2016 General. This was disclosed on the July 2014 Quarterly Report.

Crowley Maritime Corporation Federal PAC: On 6/6/14, \$2500 was refunded. This was disclosed on the July 2014 Quarterly Report.

The Geo Group PAC: On 4/1/14, \$5000 was redesignated to the 2016 General. This was disclosed on the July 2014 Quarterly Report.

The Committee now de-dupes and performs reviews of the data weekly to identify any excessive contributions that may have been missed during the initial processing. Once excessive contributions are identified, the Committee takes steps to either reattribute, redesignate or refund if necessary. For presumptive reattributions and redesignations, the Committee notifies the contributors in writing within 60 days of receipt and gives the contributor the opportunity to change this designation or request a refund as required by the Commission regulations. For excessive contributions that cannot be presumptively reattributed or redesignated, the excessive portion of the contribution is refunded within 60 days of receipt of the original contribution, with most being issued within the same reporting period.

In addition, we have asked our database vendor to review the files to make sure it has de-duped the records. We have also asked that they retrain their staff to properly input contribution data in the first instance. We are also reviewing our processes to ensure that we are taking every step to avoid these issues in the future.

2. Your letter indicates that the above referenced report discloses contributions that appear to be from a corporation or labor organization. BGR LLC and Little River Plantation Holding LLC are both partnerships. Partner attribution has been requested and will be disclosed on future reports if it is received.

Sincerely,



Lisa Lisker  
Assistant Treasurer

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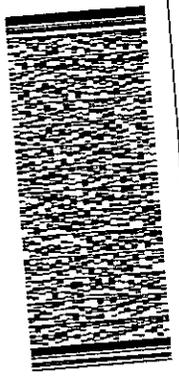
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# United States Senate

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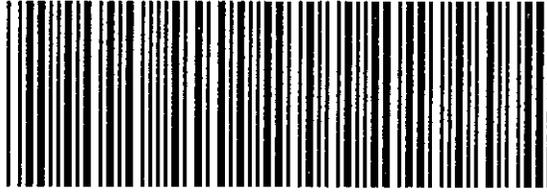
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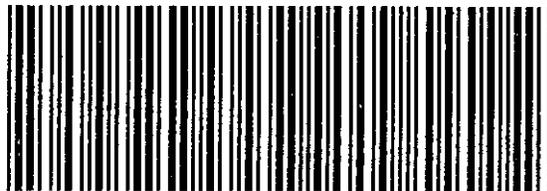
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