



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 7, 2018

DAVID L. GOULD, TREASURER
WESTSIDE DEMOCRATIC HQ FEDERAL
249 E. OCEAN BLVD. SUITE 685
LONG BEACH, CA 90802

Response Due Date
12/12/2018

IDENTIFICATION NUMBER: C00673590

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2018 - 09/30/2018)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in enforcement action.** Additional information is needed for the following 3 item(s):

1. Schedule A (see attached) discloses one or more contributions which appear to be from a corporation. Please be advised that 52 U.S.C. §30118(a) (formerly 2 U.S.C. §441b(a)) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation. Limited liability companies (LLCs) that choose to be treated as corporations under the Internal Revenue Service rules, or have shares that are traded publicly, are considered corporations. In the event that the LLC is treated as a partnership under IRS rules, the aforementioned contributions are to be attributed to each member in direct proportion to his or her share of the LLC's profit or by agreement of its members. Each member who has contributed in excess of \$200 for the calendar year should be identified by name, address, amount of contribution, name of employer, occupation and aggregate total on Schedule A. (11 CFR §110.1(g)(1) through (5))

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received prohibited contributions, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any

WESTSIDE DEMOCRATIC HQ FEDERAL

Page 2 of 4

request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. (11 CFR §103.3(b)(1))

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of your check for any transfer out or refund. In addition, any transfers out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to transfer out or refund the amount will be taken into consideration.

2. Schedule A supporting Line 11(a)(i) of your report discloses contributions received through "Actblue" totaling \$7,193 and contributions received through "Square" totaling \$3,091 marked as memo entries. Line 11(a)(i) of your report also discloses \$8,765.64 in non-memo receipts received from "Actblue" and \$6,299 in non-memo receipts received through "Square," which appear to relate to the memo entries disclosed. Please be advised that the total amount of contributions transferred by a conduit should not be included in your Schedule A total to avoid inflating your cash on hand. Please amend your report or provide additional clarifying information regarding this apparent discrepancy.

3. Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. Please be advised that 52 U.S.C. §30116(f) (formerly 2 U.S.C. §441a(f)) and 11 CFR §§110.1(d) and 110.2(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return

WESTSIDE DEMOCRATIC HQ FEDERAL

Page 3 of 4

of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

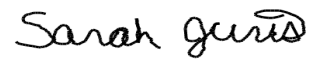
Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1175.

WESTSIDE DEMOCRATIC HQ FEDERAL

Page 4 of 4

Sincerely,

A handwritten signature in black ink that reads "Sarah Juris". The signature is written in a cursive, slightly slanted style.

Sarah Juris
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

324

Impermissible, Excessive, and Prohibited Contributions
WESTSIDE DEMOCRATIC HQ FEDERAL (C00673590)

Contributions from Possible Prohibited Entities (Corporations, Labor Organization, LLCs)

Contributor Name	Date	Amount	Report
Square	7/1/18	\$50.00	2018 October Quarterly
Square	7/5/18	\$130.00	2018 October Quarterly
Square	7/9/18	\$2.00	2018 October Quarterly
Square	7/11/18	\$27.00	2018 October Quarterly
Square	7/12/18	\$75.00	2018 October Quarterly
Square	7/13/18	\$6.00	2018 October Quarterly
Square	7/15/18	\$80.00	2018 October Quarterly
Square	7/18/18	\$25.00	2018 October Quarterly
Square	7/20/18	\$76.00	2018 October Quarterly
Square	7/22/18	\$517.00	2018 October Quarterly
Square	7/23/18	\$31.00	2018 October Quarterly
Square	7/24/18	\$106.00	2018 October Quarterly
Square	7/29/18	\$347.00	2018 October Quarterly
Square	7/29/18	\$97.00	2018 October Quarterly
Square	7/31/18	\$40.00	2018 October Quarterly
Square	8/1/18	\$50.00	2018 October Quarterly
Square	8/5/18	\$25.00	2018 October Quarterly
Square	8/5/18	\$50.00	2018 October Quarterly
Square	8/12/18	\$372.00	2018 October Quarterly
Square	8/12/18	\$124.00	2018 October Quarterly
Square	8/15/18	\$164.00	2018 October Quarterly
Square	8/16/18	\$109.00	2018 October Quarterly
Square	8/19/18	\$351.00	2018 October Quarterly
Square	8/19/18	\$85.00	2018 October Quarterly
Square	8/21/18	\$78.00	2018 October Quarterly
Square	8/22/18	\$81.00	2018 October Quarterly
Square	8/23/18	\$222.00	2018 October Quarterly
Square	8/26/18	\$138.00	2018 October Quarterly
Square	8/28/18	\$51.00	2018 October Quarterly
Square	8/29/18	\$25.00	2018 October Quarterly
Square	8/30/18	\$2.00	2018 October Quarterly
Square	9/2/18	\$275.00	2018 October Quarterly
Square	9/5/18	\$1,025.00	2018 October Quarterly
Square	9/5/18	\$30.00	2018 October Quarterly
Square	9/6/18	\$50.00	2018 October Quarterly

**Impermissible, Excessive, and Prohibited Contributions
WESTSIDE DEMOCRATIC HQ FEDERAL (C00673590)**

Contributions from Possible Prohibited Entities (Corporations, Labor Organization, LLCs) (cont

Contributor Name	Date	Amount	Report
Square	9/9/18	\$131.00	2018 October Quarterly
Square	9/9/18	\$545.00	2018 October Quarterly
Square	9/10/18	\$35.00	2018 October Quarterly
Square	9/11/18	\$825.00	2018 October Quarterly
Square	9/12/18	\$154.00	2018 October Quarterly
Square	9/13/18	\$99.00	2018 October Quarterly
Square	9/16/18	\$33.00	2018 October Quarterly
Square	9/16/18	\$266.00	2018 October Quarterly
Square	9/17/18	\$38.00	2018 October Quarterly
Square	9/18/18	\$62.00	2018 October Quarterly
Square	9/19/18	\$208.00	2018 October Quarterly
Square	9/20/18	\$25.00	2018 October Quarterly
Square	9/23/18	\$56.00	2018 October Quarterly
Square	9/23/18	\$1,076.00	2018 October Quarterly
Square	9/26/18	\$259.00	2018 October Quarterly
Square	9/30/18	\$245.00	2018 October Quarterly

Excessive Contributions from Committees

Contributor Name	Date	Amount	Report
CODEBLUE PAC	4/10/18	\$2,500.00	2018 July Quarterly
CODEBLUE PAC	8/14/18	\$2,500.00	2018 October Quarterly
CODEBLUE PAC	9/4/18	\$2,500.00	2018 October Quarterly