



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 23, 2018

RITA COPELAND, TREASURER
PLACER COUNTY DEMOCRATIC CENTRAL
COMMITTEE
5429 MADISON AVENUE
SACRAMENTO, CA 95841

Response Due Date
05/29/2018

IDENTIFICATION NUMBER: C00433318

REFERENCE: MID-YEAR REPORT (01/01/2017 - 06/30/2017)

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. On Schedule H1, you have failed to check a fixed percentage for your allocated federal and non-federal administrative, generic voter drive and exempt activity costs. For State, District and Local party committees, Schedule H1 must disclose a fixed percentage on the first report of each calendar year that discloses an allocable disbursement. Further, all shared administrative, generic voter drive and exempt activity costs incurred during the two-year cycle must be allocated according to the appropriate fixed ratio, unless the federal account elects to pay a higher percentage of its cost. Please amend your report to include a corrected Schedule H1. (11 CFR §106.7(d)(2) and (3))
2. Line 18(a), Column A of the Detailed Summary Page on your Mid-Year Report (1/1/17 – 6/30/17), discloses \$34,868.74 in transfers from the non-federal account for allocated activity for the reporting period. However, Line 21 (a)(ii) Column A discloses \$29,954.13 as the non-federal share for allocated activity for the reporting period. While the non-federal account is permitted to transfer funds to the federal account for allocated activity, transfers for allocated activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. (11 CFR §§106.6(e)(2) and 106.7(f)(2)) Please clarify the nature of the transfers-in from the non-federal account.

The Commission recommends that you immediately transfer back to the

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non-federal account, the total excessive amount which was received by your federal account outside the 70-day time period. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

3. Schedule H4 supporting Line 21(a) of your report discloses a payment(s) for "Digital Ads," "Office Supplies and Equipment, **Promotional Materials**, Charity Program Items," "Promotional Material," "**Promotional Material**, Office Supplies/Equipment, Food and Beverages," and "Promotional Materials." Please be advised that pursuant to 11 CFR §300.33(c)(1), expenditures for public communications (as defined by 11 CFR §100.26) that refer to a clearly identified candidate for Federal office and that promote, support, attack or oppose any such candidate for Federal office must not be allocated between or among federal and non-federal accounts. Only federal funds may be used.

Further, expenditures and disbursements for public communications that refer to a clearly identified candidate for Federal office and that promote, support, attack or oppose any candidate for Federal office, meet the definition of Federal Election Activity under 11 CFR §100.24 and should be disclosed on Schedule B for Line 30(b) along with the identity of the candidate(s). However, public communications that meet the definition of Federal Election Activity and that also contain express advocacy as defined under 11 CFR §100.22, but do not meet the conditions of exempt activity, would constitute an in-kind contribution, an independent expenditure or a coordinated party expenditure and should be properly disclosed on a Schedule B, E or F supporting Lines 23, 24 or 25, as appropriate, rather than on Schedule B for Line 30(b). Please amend your report to properly disclose this activity or provide clarifying information.

If this activity was categorized incorrectly, the Commission recommends that you immediately transfer the funds received by your federal account for this activity back to the non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action 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.**

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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) 694-1136.

Sincerely,

A handwritten signature in black ink, appearing to read "Joshua Rebollozo". The signature is fluid and cursive, with the first name "Joshua" being more prominent and the last name "Rebollozo" following in a similar style.

Joshua Rebollozo
Campaign Finance Analyst
Reports Analysis Division