



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

July 8, 2013

JUDY MOUNT, TREASURER  
DEMOCRATIC EXECUTIVE COMMITTEE OF  
FLORIDA  
214 SOUTH BRONOUGH STREET  
TALLAHASSEE, FL 32301

**Response Due Date**  
**08/12/2013**

IDENTIFICATION NUMBER: C00005561

REFERENCE: FEBRUARY MONTHLY REPORT (01/01/2013 - 01/31/2013)

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 an audit or enforcement action.** Additional information is needed for the following 4 item(s):

1. Schedule A, supporting Line 12 of your report discloses a transfer, totaling \$50,000 from "ASDC/Dollars For Democrats," that appear to be received through joint fundraising efforts. However, "ASDC/Dollars For Democrats" is not disclosed as a joint fundraising representative on your Statement of Organization. Please amend your Statement of Organization to disclose the joint fundraising representative or amend your report to provide clarifying information. (11 CFR §102.2)
2. Schedule A supporting Line 15 of the Detailed Summary Page discloses a refund(s) or rebate(s) of what appears to be a previously disclosed allocable expense(s) from "2 Oakland Three, LLC," "Biscayne Plaza II, LLC," "Blue Cross and Blue Shield of Florida," "Palm Springs Mile Associates Ltd," and "TECO Energy Inc." Please be advised that when a committee receives a refund or rebate of an allocable expense, it must be allocated between the federal and non-federal accounts according to the same allocation ratio used to allocate the original disbursement. Furthermore, the federal account must transfer the non-federal portion to the non-federal account and disclose this transfer-out on Schedule H4. Your report does not appear to disclose a transfer-out of the non-federal portion of this refund(s) or rebate(s). Please provide clarification regarding this apparent omission. (11 CFR §104.17 and Advisory Opinion 1995-22)

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3. Schedule H4 supporting Line 21(a) of your report discloses an apparent refund(s) to an individual of a federal contribution originally received by your committee. Please be advised this disbursement should be disclosed on Schedule B supporting Line 28(a) of the Detailed Summary Page. Refunds of federal contributions do not qualify as shared expenses to be allocated between your federal and non-federal accounts. Any reimbursement from your committee's non-federal account for any portion of this activity is not permissible. 11 CFR §102.5(a)(1)(i) Please amend your report(s) to properly disclose this activity or provide clarifying information.

4. Schedule H4 of your report discloses disbursements for the Administrative category which use a ratio that is inconsistent with the ratio disclosed on Schedule H1. The fixed ratio for the allocation of administrative, generic voter drive and exempt activity expenses by State, district and local party committees should be the same for the full two-year election cycle, unless a Special election is scheduled during an odd numbered year. Please amend your report to clarify this apparent discrepancy.

Please note that if your non-federal account has overpaid your federal account because of this miscalculation, it will be necessary to immediately transfer these funds back to the non-federal account. While the Commission may take further legal action concerning any impermissible overpayments by the non-federal account, your prompt action will be taken into consideration. (11 CFR §§106.7(d))

- Please be advised that you have used incorrect committee identification numbers for contributions disclosed on Schedule A, supporting Line 12. For your information and consideration for further filings, please file all future reports using correct identification numbers for contributions from other committees, where applicable.

**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)

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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. 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) 694-1164.

Sincerely,

A handwritten signature in black ink that reads "Nicole Miller". The signature is written in a cursive style with a large initial "N" and a long, sweeping underline.

Nicole Miller  
Senior Campaign Finance Analyst  
Reports Analysis Division

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