



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

June 3, 2018

WILLA PORTER, TREASURER
SOUTH ORANGE COUNTY DEMOCRATIC
CLUB
PO BOX 7292
CAPISTRANO BEACH, CA 92624

Response Due Date
07/09/2018

IDENTIFICATION NUMBER: C00421057

REFERENCE: YEAR-END REPORT (01/01/2017 - 12/31/2017)

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 8 item(s):

1. Your report contains financial activity disclosed on a previous report. Overlapping coverage dates create difficulties in tracking the committee's cash flow. Please amend this report to include only the financial transactions that occurred between 7/1/17 and 12/31/17. (52 U.S.C. §30104(b) (formerly 2 U.S.C. § 434(b)))
2. Your report(s) was not signed by the treasurer or designated agent listed on your Statement of Organization (FEC Form 1). Please amend your report(s) by providing the signature of an individual that is authorized to sign the report(s). If a new treasurer has been appointed, please file an amended Statement of Organization or a letter (if not an electronic filer) to reflect this change. (52 U.S.C. §30104(a)(1) (formerly 2 U.S.C. §434(a)(1)) and 11 CFR §104.14(a) and (d))
3. Please provide a Schedule A to support the total amounts disclosed on Lines 11(b) and 11(c) of the Detailed Summary Page. All contributions from political committees must be itemized on Schedule A regardless of the amount. (52 U.S.C. §30104(b)(3)(B) (formerly 2 U.S.C. §434(b)(3)(B)) and 11 CFR § 104.3(a)(4)(ii))
4. A review of the reports filed by your committee indicates that your committee

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received one or more contributions from "DEMOCRATIC PARTY OF ORANGE COUNTY" which has not been disclosed on their report(s) of receipts and disbursements. Please clarify if the contribution was received from the disclosed donor's federal account and amend your report(s) if necessary.

5. On Schedule B supporting Line 21(b), you have itemized disbursements for which you have failed to include the purpose. Please amend your report to include the missing information. (11 CFR § 104.3(b)(3))

6. Schedule B of your report discloses reimbursements to individuals for "REIMBURSEMENT FOR MEETING SUPPLIES" and "REIMBURSEMENT FOR OFFICE SUPPLIES AND FL." Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information and clearly identify on the Schedule B, which reimbursement each memo entry relates to. If itemization is not necessary, you must indicate so in an amendment to this report. 11 CFR §§104.3(b)(3)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3

7. Schedule B supporting Line 21(b) discloses disbursements from petty cash for "WITHDRAWAL FOR PETTY CASH." Please be advised that cash disbursements to any person or vendor for any single purchase or transaction may not exceed \$100. If payments to the original vendor exceed \$200 in a calendar year, a memo entry including the name of the original vendor as well as address, date, amount, and purpose of the original purchase must be provided. Please amend your report to include the missing information or provide clarifying information if memo items are not required. (52 U.S.C. §30102(h)(2) (formerly 2 U.S.C. § 432(h)(2)) and 11 CFR §102.11)

8. On Schedule B supporting Line 21(b) of the Detailed Summary Page, your committee discloses a disbursement for "TRANSFER TO CALIF. STATE PAC" and lists itself "SOUTH ORANGE COUNTY DEMOCRATIC CLUB" as the payee. Please clarify the nature of this transaction or amend Schedule B by providing the correct name and mailing address of the payee.

If this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

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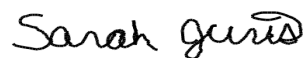
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- Your report discloses certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. For your information and consideration when preparing future filings, contributions received from federal candidates and committees should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page, and contributions made to federal candidates and committees should be properly disclosed on a separate Schedule B, supporting Line 23 of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (52 U.S.C. §30104(b) (formerly 2 U.S.C §434(b)) and FORM 3X Instructions)

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.

Sincerely,



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