

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

May 22, 2013

DAVID DONNELLY, TREASURER FRIENDS OF DEMOCRACY 1133 19TH ST. NW 9TH FLOOR WASHINGTON, DC 20036

IDENTIFICATION NUMBER: C00520080

Response Due Date 06/26/2013

REFERENCE: AMENDED OCTOBER QUARTERLY REPORT (07/01/2012 - 09/30/2012), RECEIVED 04/12/2013

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 $\underline{1}$ item(s):

1. Your amended report discloses an increase in disbursements totaling \$148,425.75 on Line(s) 21(b) and 29 of the Detailed Summary Page and an increase in debts totaling \$26,467.85 on Line(s) 9 of the Summary Page from those disclosed on your original report. Please provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)

- Schedule B of your report discloses an expenditure(s) for "phone survey", "polling" and "radio ad." For your information and consideration when preparing future filings, if a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and would be disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate would be reported on Schedule B for Line 21(b) of the Detailed Summary Page.

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

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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. 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) 694-1141.

Sincerely,

Pour Buckly

Daniel Buckley Senior Campaign Finance Analyst Reports Analysis Division

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