



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 18, 2010

Alma Gonzalez, Treasurer  
Democratic Executive Committee of Florida  
214 South Bronough Street  
Tallahassee, FL 32301

Response Due Date:  
April 22, 2010

Identification Number: C00005561

Reference: Amended October Monthly Report (9/1/09 – 9/30/09), received 12/20/09

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) 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 5 items:

1. The totals listed on Lines 11(a)(i) and 11(a)(ii), Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. When an individual's aggregate exceeds the \$200 threshold, the amount should not be deducted from the Column B figure for Line 11(a)(ii). Please amend your report and any subsequent reports that may be affected by this correction.
2. Schedule H4 discloses a disbursement(s) which is categorized as a fundraising expense(s); however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the direct costs of each fundraising event in which the committee collects both federal and non-federal funds. The costs are allocated according to the funds received ratio and reported on Schedule H2. 11 CFR §§106.6(d) and 106.7(d)(4). Please file a Schedule H2 to disclose the ratio for the fundraising event(s).
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

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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 a reimbursement(s) to an individual(s) "Arceneaux, Scott" for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by committee staff that make up the reimbursement have to be itemized as memo entries regardless of the amount. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and an adequate purpose. Please amend your report to include the missing information and clearly identify on the Schedule H4, which reimbursement each memo entry relates to. 11 CFR §§104.10 and 104.17, and Advisory Opinion 1996-20, footnote 3

5. Schedule H4 of your report discloses payments to "Maurino, Michael," "Maurino, Michael," "Fantasy of Flight," "Liquors, Big Game," "Broward County AFL-CIO," "ABC Liquors, Inc." and "Fantasy of Flight" which are categorized as Administrative expenses; however, the purposes of disbursement disclosed are "Consulting/Event Coordinator," "Consulting/Event Coordinator," "Event /Catering," "Event/Catering," "Event/Tickets," "Event Catering" and "Event Site Rental." Please be advised that payments made for your committee's fundraising activities must be allocated according to the funds received method and the ratio reflected on Schedule H2. Please amend your report to clarify the appropriate category for this activity or provide clarifying information regarding this apparent discrepancy.

**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. 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) 694-1393.

Sincerely,



Sylvette S. Garnes  
Senior Campaign Finance Analyst  
Reports Analysis Division

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