



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 3, 2015

TYLER CLARK, TREASURER  
DEMOCRATIC PARTY OF ARKANSAS  
1300 WEST CAPITOL AVENUE  
LITTLE ROCK, AR 72201

**Response Due Date**  
**04/07/2015**

IDENTIFICATION NUMBER: C00024372

REFERENCE: YEAR-END REPORT (11/25/2014 - 12/31/2014)

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 3 item(s):

1. Schedule A of your 2014 Reports combined, discloses transfers totaling \$250,604.17 from "Grassroots Victory 2014" and \$19,610.54 from "AR Senate Victory," which is a joint fundraising committee(s) affiliated with your committee. You must provide a memo Schedule A disclosing your share of gross receipts. The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the calendar year, and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount. Please amend your report by providing the omitted memo schedule(s). (11 CFR §102.17(c)(8)(i)(B))
2. Schedule A of your 2014 Reports combined, discloses transfers totaling \$37,789.76 from the "AR Party Victory Fund", which is a joint fundraising committee affiliated with your committee. The sum of memo Schedule A is less than the total amount transferred. Please note that the sum of memo Schedule A supporting a transfer(s) from a joint fundraising committee should be greater than or equal to the amount of the transfer(s).

Each participating committee shall report its share for net proceeds received from the joint fundraising committee as a transfer-in on Schedule A. A memo Schedule A must be provided to itemize your committee's share of the gross contributions received through the joint fundraiser. The memo schedule should

## DEMOCRATIC PARTY OF ARKANSAS

Page 2 of 3

itemize each individual who has contributed an aggregate in excess of \$200 during the calendar year and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount. (11 CFR § 102.17(c)(8)(i)(B)) Please amend your report to include the missing Schedule A or provide an explanation for this apparent discrepancy.

3. The Detailed Summary Page, on Line 18(a) Column A of your 12 Day Pre-General (10/1/14 - 10/15/14), 30 Day Post-General (10/16/14 - 11/25/14), and Year End (11/26/14 - 12/31/14) Reports combined, discloses \$358,315.22 in transfers from the non-federal account for allocated activity for the reporting period. However, Line 21 (a)(ii) Column A discloses \$340,341.93 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 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.

**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. 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.

DEMOCRATIC PARTY OF ARKANSAS

Page 3 of 3

Sincerely,

A handwritten signature in black ink, appearing to read "Paul R. Stuetz". The signature is written in a cursive style with a large, stylized initial "P" and "S".

Paul Stuetz  
Senior Campaign Finance Analyst  
Reports Analysis Division

320