



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

September 15, 2014

ART COPLESTON, TREASURER  
DEMOCRATIC HEADQUARTERS OF THE DESERT  
(DHQD)  
1581 CONCHA CIRCLE  
PALM SPRINGS, CA 92264

**Response Due Date**  
**10/20/2014**

IDENTIFICATION NUMBER: C00496679

REFERENCE: AMENDED YEAR-END REPORT (07/01/2013 - 12/31/2013), RECEIVED  
01/28/2014

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 report (see attached) discloses one or more contributions which appears to be from a labor organization(s). Please be advised that 2 U.S.C. §441b(a) prohibits the receipt of contributions from labor organizations unless made from a separate segregated fund established by the labor organization.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received a prohibited contribution, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. (11 CFR §103.3(b)(1))

DEMOCRATIC HEADQUARTERS OF THE DESERT (DHQD)

Page 2 of 4

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

2. Schedule A of your report (see attached) discloses one or more contributions from an organization(s), which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. § 441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible.

To the extent that your committee has received prohibited funds, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. (11 CFR §103.3(b)(1))

DEMOCRATIC HEADQUARTERS OF THE DESERT (DHQD)

Page 3 of 4

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of your check for any transfer- out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

**3.** Schedule A supporting Line 11(a)(i) of your report discloses receipts identified as "Various cash, contributors (date)" Please be advised that federal regulations require the itemization of all contributions from individuals/persons that aggregate greater than \$200 in the calendar year. Contributions from individuals/persons that aggregate \$200 or less need only be disclosed on Line 11(a)(ii) of the Detailed Summary Page.

Please clarify whether the receipts disclosed on Schedule A includes any contributions that aggregate greater than \$200 from an individual/person in the calendar year. If this is the case, please amend your report by itemizing the contributions from each individual/person on Schedule A. (11 CFR §104.3(a)(2))

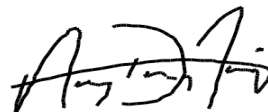
**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions 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) 694-1176.

DEMOCRATIC HEADQUARTERS OF THE DESERT (DHQD)

Page 4 of 4

Sincerely,

A handwritten signature in black ink, appearing to read "Arman Tarzi". The signature is stylized with a large, looped "A" and a "T" that extends into a flourish.

Arman Tarzi  
Campaign Finance Analyst  
Reports Analysis Division

323

**Excessive, Prohibited, and Impermissible Contributions**  
**DEMOCRATIC HEADQUARTERS OF THE DESERT (C00496679)**

**Contributions from Possible Prohibited Entities**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Report</b>
C.O.P.E. San Bernardino/Rivers	9/13/13	\$250.00	2013 Year End, received 1/28/14
IBEW 440	9/4/13	\$2,500.00	2013 Year End, received 1/28/14

**Contributions from Non-Federal/ Unregistered Organizations**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Report</b>
Democrats in Trilogy La Quinta	11/11/13	\$100.00	2013 Year End, received 1/28/14
Democrats in Trilogy La Quinta	11/26/13	\$45.00	2013 Year End, received 1/28/14
Democrats in Trilogy La Quinta	11/26/13	\$150.00	2013 Year End, received 1/28/14
Democrats of Shadow Hills	9/14/13	\$116.40	2013 Year End, received 1/28/14
RCDCC - State Political Party	7/14/13	\$64.00	2013 Year End, received 1/28/14
RCDCC - State Political Party	7/31/13	\$64.00	2013 Year End, received 1/28/14
RCDCC - State Political Party	9/10/13	\$64.00	2013 Year End, received 1/28/14
RCDCC - State Political Party	11/16/13	\$85.00	2013 Year End, received 1/28/14
RCDCC - State Political Party	11/16/13	\$85.00	2013 Year End, received 1/28/14
RCDCC - State Political Party	12/5/13	\$85.00	2013 Year End, received 1/28/14
RCDCC - State Political Party	12/17/13	\$85.00	2013 Year End, received 1/28/14