



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

January 2, 2020

JOAN STEARNS, TREASURER  
FRIENDS OF CLIFF STEARNS  
PO BOX 308  
SILVER SPRINGS, FL 34489

**Response Due Date**  
**02/06/2020**

IDENTIFICATION NUMBER: C00229377

REFERENCE: APRIL QUARTERLY REPORT (1/1/2019 - 3/31/2019) AND  
JULY QUARTERLY REPORT (4/1/2019 - 6/30/2019)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests clarification concerning the disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in further Commission review. Additional information is requested for the following item(s):

Your most recent report discloses a significant amount of residual cash on hand. Please explain the committee's intended use of the residual campaign funds. If the candidate intends to terminate the committee, redesignate the committee as a principal campaign committee for a future election or convert it to a multicandidate political committee, please note this for the public record.

Be aware that committee assets, including cash-on-hand, may not be converted to personal use. Personal use is any use of funds in a campaign account of a present or former candidate to fulfill a commitment, obligation or expense of any person that would exist irrespective of the candidate's campaign or duties as a federal office holder. 11 CFR §113.1.

In addition to defraying expenses in connection with a campaign for federal office, the funds in a campaign account may be used to defray the costs of winding down the campaign, including winding down the office of a former federal officeholder for a period of six months after he or she leaves office. 11 CFR §113.2. A campaign committee that no longer receives any contributions or makes any disbursements that would otherwise qualify it as a political committee may terminate, provided that such committee has no outstanding debts or obligations. The committee may file a termination report or request with the Commission, providing a statement concerning the disposition of residual funds. 11 CFR §102.3.

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Please review the purposes of the attached disbursements and clarify their nature. If the disbursements constitute personal use, the committee should seek reimbursement for the appropriate amount of the personal use violation from the beneficiary. In addition, you should show this reimbursement on Schedule A supporting Line 15 of the Detailed Summary Page of the report covering the period in which the reimbursement is received. If any of the disbursements on the attachment were incompletely or incorrectly reported, please amend your original report(s) with the complete and correct information. If the expenses were incurred because candidate is testing the waters for a future election, please specify to which election the disbursements relate.

Please respond within 35 days of this letter. **NOTE**, you will not receive an additional notice from the Commission on this matter. **Requests for extensions of time in which to respond will not be considered.** Any response submitted by your entity will be placed on the public record and will be considered by the Commission prior to initiating any further review of this matter.

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 information about the report review process or specific filing information for your committee type, please visit [www.fec.gov/help-candidates-and-committees](http://www.fec.gov/help-candidates-and-committees). For more information about Requests for Additional Information (RFAI), why you received a letter, and how to respond, please visit [www.fec.gov/help-candidates-and-committees/request-additional-information](http://www.fec.gov/help-candidates-and-committees/request-additional-information). Should you 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) 694-1163.

Sincerely,



Nataliya Ioffe  
Chief, Authorized Branch  
Reports Analysis Division

**Disbursements in Question**  
**Friends of Cliff Sterns (C00229377)**

<b>Name</b>	<b>Date</b>	<b>Amount</b>	<b>Purpose</b>
Card Services (Barclays)	2/1/19	\$163.68	Printer
Card Services (Barclays)	4/9/19	\$256.00	Internet upgrade
Clark Hill	6/10/19	\$4,737.50	Attorney fees
Clark Hill	4/9/19	\$320.00	Attorney fees
Cox Communications, Inc.	1/8/19	\$98.74	Internet
Cox Communications, Inc.	2/10/19	\$98.74	Internet
Cox Communications, Inc.	3/5/19	\$98.74	Internet
Neighborhood Storage	4/4/19	\$680.94	Storage
Purvis Gray & Company	4/6/19	\$1,750.00	Accounting services, prep
Stearns, Joan	1/10/19	\$1,000.00	Accounting services
Stearns, Joan	2/12/19	\$1,000.00	Accounting services
Stearns, Joan	3/12/19	\$1,000.00	Accounting services
Stearns, Joan	4/10/19	\$1,000.00	Accounting, FEC prep
Stearns, Joan	5/21/19	\$1,000.00	Accounting, FEC prep
Stearns, Joan	6/11/19	\$1,000.00	Accounting, FEC prep