



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

RQ-2

June 5, 2024

KATIE TERRY, TREASURER
FRIENDS OF DAVE MCCORMICK
PO BOX 23537
PITTSBURGH, PA 15222

Response Due Date
07/10/2024

IDENTIFICATION NUMBER: C00851980

REFERENCE: 12 DAY PRE-PRIMARY REPORT (01/01/2024 - 04/03/2024)

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 4 item(s):

1. Schedule A of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached). The Commission notes your additional explanation regarding the committee's corrective action taken for **all** of these contributions.

An individual or a political committee other than an authorized committee or a qualified multi-candidate committee may not make a contribution(s) to a candidate for federal office in excess of \$3,300 per election. An authorized committee may not make a contribution(s) to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (52 U.S.C. § 30116(a) and (f) (formerly 2 U.S.C. § 441a(a) and (f)); 11 CFR §§ 110.1(b), (e) and (k), and 102.13(c))

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

Please be reminded that all refunds, redesignations and reattributions must be made within 60 days of receipt of the contribution. To date, one or more of the

FRIENDS OF DAVE MCCORMICK

Page 2 of 5

apparent excessive contributions have not been refunded, redesignated, or reattributed.

For reattributions, the funds can be retained if, within 60 days of receipt, the excessive amount was properly reattributed to another person. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written documentation, signed by each contributor, authorizing a reattribution and indicating the amount of the contribution to be attributed to each contributor; or (2) the committee reattributes by presumption the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor who signed the check an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

For redesignations, the funds can be retained if, within 60 days of receipt, the excessive amount was properly designated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election; or (2) the committee redesignates by presumption the excessive portion of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) A contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt, the excessive amount must be refunded. (11 CFR § 103.3(b)(1))

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/ or letters reattributing or redesignating the contributions in question. Refunds are reported on Line 20(a), (b), or (c), as applicable, of the Detailed Summary Page and on a supporting Schedule B of the report covering the period

FRIENDS OF DAVE MCCORMICK

Page 3 of 5

in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR § 104.8(d)(2), (3) and (4))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund or redesignate and/or reattribute the excessive amount will be taken into consideration.

2. Schedule A of your report discloses one or more contributions from an organization(s) which is not a political committee registered with the Commission (see attached). In order for your committee to accept contributions from unregistered organizations, your committee should take steps to ensure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 52 U.S.C. §§ 30116(f) and 30118 (formerly 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.

If you have received prohibited contributions, you must make a refund. (11 CFR § 103.3(b)(1)) The refund must be made within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(2))

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide a photocopy of any refund checks. Refunds must be reported on a Schedule B supporting Line 20(b) or (c), as applicable, of the report covering the period in which the refund was made. (11 CFR § 104.8(d)(4))

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, your prompt action to refund the prohibited amount will be taken into consideration.

FRIENDS OF DAVE MCCORMICK

Page 4 of 5

3. Schedule A supporting Line 11(a)(i) discloses a chargeback of a contribution received from Curzio, Pat Sealey. However, it appears that your committee did not report the receipt of the original contribution. Please amend the appropriate report(s) to disclose the original contribution or provide clarifying information. (52 U.S.C. § 30104(b) (formerly 2 U.S.C. § 434(b)) and 11 CFR § 104.3(a) & (b))

4. The Commission notes the redesignation or reattribution of several contributions. Please amend your report to disclose the proper format for redesignations or reattributions. The first entry must disclose the information for the contribution as it was originally received. **The second entry must disclose, as a memo entry, the amount of the redesignation or reattribution as a negative amount.** The third entry must disclose, as a memo entry, the information on the contribution as it was redesignated or reattributed, including the date the redesignation or reattribution was made and, in the case of a redesignation, the election for which the contribution was redesignated. (11 CFR § 104.8(d)(2), (3), and (4)) Please refer to the Campaign Guide for Congressional Candidates and Committees for further guidance on how to report redesignations and reattributions.

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. For information about the report review process or specific filing information for your committee type, please visit www.fec.gov/help-candidates-and-committees. For more information about Requests for Additional Information (RAFI), why you received a letter, and how to respond, please visit 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) 694-1252.

FRIENDS OF DAVE MCCORMICK

Page 5 of 5

Sincerely,

A handwritten signature in dark ink, appearing to read 'Ian Pritchard', with a stylized, sweeping flourish extending to the right.

Ian Pritchard
Campaign Finance Analyst

455

Apparent Excessive, Prohibited, and Impermissible Contributions
Friends of Dave McCormick (C00851980)

Apparent Excessive Contributions from Individuals

Contributor Name	Date	Amount	Election
Armacost, Samuel	2/13/24	\$6,600.00	P2024
Barg, Steven	3/16/24	\$5,000.00	P2024
Barkman, Lars Martin	3/5/24	\$3,300.00	P2024
Barkman, Lars Martin	3/5/24	\$3,300.00	P2024
Barve, Neil	3/22/24	\$6,600.00	P2024
Baum, David	4/3/24	\$5,000.00	P2024
Bessent, Scott	3/28/24	\$6,600.00	P2024
Bidwill, Michael	3/18/24	\$5,000.00	P2024
Billingsley, Lucy C. Mrs.	10/4/23	\$1,250.00	P2024
Billingsley, Lucy C. Mrs.	2/2/24	\$2,500.00	P2024
Billingsley, Lucy C. Mrs.	4/2/24	-\$450.00	P2024
Billingsley, Lucy C. Mrs.	4/2/24	\$2,500.00	P2024
Bossidy, Lawrence A.	3/14/24	\$10,000.00	P2024
Bossidy, Lawrence A.	3/15/24	-\$5,000.00	P2024
Bossidy, Nancy Jo	3/15/24	\$5,000.00	P2024
Brown, Drew	3/7/24	\$5,000.00	P2024
Carter, Robert B.	2/13/24	\$6,600.00	P2024
Casey, Helen Hanna Mrs.	3/14/24	\$6,600.00	P2024
Choi, Emilie	2/5/24	\$3,300.00	P2024
Choi, Emilie	2/16/24	\$3,300.00	P2024
Cohen, Steve	3/25/24	\$6,600.00	P2024
Crocker, Charles	12/1/23	\$3,300.00	P2024
Crocker, Charles	3/11/24	\$500.00	P2024

Apparent Excessive, Prohibited, and Impermissible Contributions
Friends of Dave McCormick (C00851980)

Currie, Neill	2/20/24	\$6,600.00	P2024
Dandrea, Rick	3/4/24	\$6,600.00	P2024
De Simone, Anthony	3/18/24	\$5,000.00	P2024
Deon, Pasquale T. Sr.	2/26/24	\$6,600.00	P2024
Detwiler, Donald L. Mr.	3/21/24	\$5,000.00	P2024
Ducker, Michael L. Mr.	2/13/24	\$6,600.00	P2024
Dunlap, Robert	3/11/24	\$5,000.00	P2024
Elliott, David	11/30/23	\$3,300.00	P2024
Elliott, David	2/27/24	\$500.00	P2024
English, Patrick	3/5/24	\$5,000.00	P2024
Feig, Jeff	3/26/24	\$6,600.00	P2024
Florkiewicz, Laurie	3/20/24	\$5,000.00	P2024
Gearon, Michael	11/21/23	\$3,300.00	P2024
Gearon, Michael	2/27/24	\$0.21	P2024
Gearon, Michael	2/28/24	-\$0.21	P2024
Gearon, Michael	3/5/24	\$3,300.00	P2024
Gerson, Mark	3/26/24	\$6,600.00	P2024
Glaser, Alan	9/27/23	\$509.00	P2024
Glaser, Alan	9/27/23	\$130.00	P2024
Glaser, Alan	10/27/23	\$509.00	P2024
Glaser, Alan	11/27/23	\$509.00	P2024
Glaser, Alan	12/27/23	\$509.00	P2024
Glaser, Alan	1/27/24	\$509.00	P2024
Glaser, Alan	2/27/24	\$509.00	P2024
Glaser, Alan	3/27/24	\$509.00	P2024
Goldfarb, Michael	3/26/24	\$6,600.00	P2024

Apparent Excessive, Prohibited, and Impermissible Contributions
Friends of Dave McCormick (C00851980)

Griffin, Kenneth	2/29/24	\$6,600.00	P2024
Hegarty, Michael	2/29/24	\$6,600.00	P2024
Hess, David	3/25/24	\$6,600.00	P2024
Holtz, Gerald	12/21/23	\$3,300.00	P2024
Holtz, Gerald	3/5/24	\$3,400.00	P2024
Hudock, Gabriel J. Mr.	4/1/24	\$10,000.00	P2024
Ingram, Michael	3/26/24	\$6,600.00	P2024
Javdan, David	3/13/24	\$10,000.00	P2024
Johnson, Sylvia	3/12/24	\$5,000.00	P2024
Karsner, Alexander	2/28/24	\$6,600.00	P2024
Kassling, W. E.	3/31/24	\$6,600.00	P2024
Kohlhepp, Robert	2/26/24	\$6,600.00	P2024
Kotick, Bobby	2/26/24	\$6,600.00	P2024
Lavinia, Robert	3/25/24	\$5,000.00	P2024
Lavinia, Robert	3/25/24	\$10.00	P2024
Leach, Howard	3/6/24	\$6,600.00	P2024
Lee, Terry	3/4/24	\$5,000.00	P2024
Levine, Eric	3/15/24	\$6,600.00	P2024
Lewinsohn, Jonathan	3/22/24	\$6,600.00	P2024
Lewis, Edward	1/3/24	\$5.00	P2024
Lewis, Edward	2/26/24	\$6,600.00	P2024
Lewis, Edward	3/12/24	\$10.00	P2024
Lewis, Edward	4/3/24	-\$3,300.00	P2024

Apparent Excessive, Prohibited, and Impermissible Contributions
Friends of Dave McCormick (C00851980)

Loeb, Bonnie	3/21/24	\$6,600.00	P2024
Lubert, Jon	2/16/24	\$6,600.00	P2024
Luckey, Palmer	3/1/24	\$6,600.00	P2024
Luebke, Richard	3/21/24	\$6,600.00	P2024
Mahoney, Dan	3/22/24	\$5,000.00	P2024
Manley, Pat	3/20/24	\$6,600.00	P2024
Miller, Dave J. Mr.	3/23/24	\$6,600.00	P2024
Mizel, Larry A. Mr.	12/7/23	-\$3,300.00	P2024
Mizel, Larry A. Mr.	12/7/23	\$3,300.00	P2024
Mizel, Larry A. Mr.	3/31/24	\$6,600.00	P2024
Moffett, James R. Mr. Jr	3/18/24	\$5,000.00	P2024
Moskowitz, Michael	3/27/24	\$6,600.00	P2024
Noto, Anthony	3/7/24	\$6,600.00	P2024
Peltz, Matt	3/15/24	\$4,500.00	P2024
Peykoff, Andy II	3/31/24	\$6,600.00	P2024
Pierce, Mitch	3/4/24	\$5,000.00	P2024
Pollock, Jon	3/22/24	\$6,600.00	P2024
Preston, Henry	2/18/24	\$16.75	P2024
Preston, Henry	2/18/24	\$3,600.00	P2024
Queenan, Charles J. Jr.	11/1/23	\$1,000.00	P2024
Queenan, Charles J. Jr.	3/14/24	\$5,000.00	P2024
Quick, Christopher C.	2/13/24	\$6,600.00	P2024

Apparent Excessive, Prohibited, and Impermissible Contributions
Friends of Dave McCormick (C00851980)

Reeves, Samuel	2/15/24	\$6,600.00	P2024
Reiman, Scott	3/11/24	\$5,000.00	P2024
Reynolds, Robert	3/30/24	\$6,600.00	P2024
Richards, Daniel	3/12/24	\$6,600.00	P2024
Ritchie, Cody	3/18/24	\$3,300.00	P2024
Ritchie, Cody	3/18/24	\$3,300.00	P2024
Sabin, Andrew Mr.	3/4/24	\$6,600.00	P2024
Sachnoff, Bruce	9/22/23	\$500.00	P2024
Sachnoff, Bruce	9/30/23	\$500.00	P2024
Sachnoff, Bruce	10/10/23	\$1,041.02	P2024
Sachnoff, Bruce	11/29/23	\$520.51	P2024
Sachnoff, Bruce	12/22/23	\$520.51	P2024
Sachnoff, Bruce	2/22/24	\$520.51	P2024
Sachnoff, Bruce	2/27/24	\$520.51	P2024
Sachnoff, Bruce	3/13/24	\$520.51	P2024
Schorr, Paul C. IV	3/14/24	\$6,600.00	P2024
Setzman, Daniel	3/18/24	\$6,600.00	P2024
Shapiro, Steven	3/29/24	\$6,600.00	P2024
Shemilt, Heather	2/12/24	\$6,600.00	P2024
Simpson, William H. Mr. Jr.	2/1/24	\$52.05	P2024
Simpson, William H. Mr. Jr.	2/27/24	\$26.03	P2024
Simpson, William H. Mr. Jr.	3/1/24	\$52.05	P2024
Simpson, William H. Mr. Jr.	3/8/24	\$3,300.00	P2024
Simpson, William H. Mr. Jr.	3/27/24	\$26.03	P2024
Simpson, William H. Mr. Jr.	4/1/24	\$52.05	P2024
Stamas, George	3/5/24	\$6,600.00	P2024
Subramaniam, Rajesh	2/13/24	\$6,600.00	P2024

Apparent Excessive, Prohibited, and Impermissible Contributions
Friends of Dave McCormick (C00851980)

Sutliff, Greg	9/22/23	\$1,000.00	P2024
Sutliff, Greg	11/26/23	\$1,000.00	P2024
Sutliff, Gregory	1/31/24	\$1,000.00	P2024
Sutliff, Gregory	2/21/24	\$100.00	P2024
Sutliff, Gregory	3/8/24	\$1,000.00	P2024
Sutliff, Gregory	3/10/24	\$1,000.00	P2024
Sutliff, Gregory	3/12/24	\$1,000.00	P2024
Taylor, Margaretta J.	3/31/24	\$6,600.00	P2024
Thomas, Jonathan	3/20/24	\$5,000.00	P2024
Thompson, Alex	11/27/23	\$1,500.00	P2024
Thompson, Alex	2/29/24	\$3,300.00	P2024
Tryhus, Gregg	3/18/24	\$5,000.00	P2024
Uihlein, Elizabeth A.	3/31/24	\$6,600.00	P2024
Ward, Bruce	3/12/24	\$5,000.00	P2024
Waxman, Charlotte	3/26/24	\$6,600.00	P2024
Weil, Louis A. Mr. III	3/18/24	\$5,000.00	P2024
Weiser, Ronald	2/22/24	\$6,600.00	P2024
Wendt, Greg	2/12/24	\$6,600.00	P2024
Wilcox, Norman	2/23/24	\$6,600.00	P2024
Witter, William	1/14/24	\$3,300.00	P2024
Witter, William	3/28/24	\$3,300.00	P2024

Contributions from Possible Unregistered Organizations

Contributor Name	Date	Amount	Election
Committee to Elect Leslie Osche	2/6/24	\$250.00	P2024
Committee to Elect Wade Root	2/6/24	\$1,000.00	P2024
Friends of Kim Geyer	2/6/24	\$500.00	P2024
Friends of Stephanie Scialabba	2/6/24	\$500.00	P2024
Freedom PA - PAC	3/25/24	\$1,000.00	P2024