



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

February 13, 2020

GREG SCHULTZ, TREASURER
BIDEN FOR PRESIDENT
1120 20TH STREET NW SUITE 250
WASHINGTON, DC 20036

Response Due Date
03/19/2020

IDENTIFICATION NUMBER: C00703975

REFERENCE: YEAR-END REPORT (10/01/2019 - 12/31/2019)

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 B-P supporting Line 28(a) of your report discloses refunds to individuals. It appears that your committee has not reported the receipt of the original contributions for the attached contributors. Please clarify these refunds and amend your report(s) as necessary. (52 U.S.C. § 30104(b) (formerly 2 U.S.C. § 434(b)) and 11 CFR § 104.3(a))
2. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B-P supporting Line 23 of your report to clarify the following description(s): "Field Services." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(4)(i)(A).

Additional clarification regarding inadequate purposes of disbursement and a non-exhaustive list of acceptable purposes are available on the FEC website at <http://www.fec.gov/help-candidates-and-committees/purposes-disbursement/>.

3. Schedule B-P of your report discloses reimbursements to individuals for the following disbursement(s): "Equipment Rental reimbursement," "Event Supplies" and "Office Supplies."

Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in an election cycle, a memo entry including the name and address of the original

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vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information on Schedule B-P and clearly identify each memo entry supporting a reimbursement. If itemization is not necessary, you must indicate so in an amendment to this report. (11 CFR §§104.3(b)(4)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3)

4. Schedule B-P of your report discloses reimbursements to individuals for the following travel related disbursement(s): "Travel" and "Travel reimbursement."

When the reimbursement amount to individuals for travel and subsistence advances exceeds \$500, the payments by staff to any one vendor that make up the reimbursement may have to be itemized. For example, if the related payments to any one vendor aggregate in excess of \$200 for the election cycle, the staff advance payment to the vendor must also be itemized in a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and detailed purpose of the advance. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must indicate so in an amendment to this report. Please amend your report to include the missing or clarifying information. See Advisory Opinion 1996-20 for additional clarification. (11 CFR § 104.9)

- Your report fails to provide election designations for some contributions disclosed on Schedule(s) A-P for Line(s) 17(a). Authorized committees should indicate the election for which the contribution was designated. If no election is designated, the contribution is applied to the next election for the federal office the candidate is seeking after the contribution date. Please amend your report to provide the missing election designations. (11 CFR §§ 110.1(b)(2) and 110.2(b)(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. For information about the report

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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 (RAI), 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-[Analysis Extension].

Sincerely,

A handwritten signature in black ink, appearing to read "J. Grainger". The signature is written in a cursive, flowing style.

Jessica Grainger
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

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**Refunds Itemized, No Original Contributions Disclosed
Biden for President (C00703975)**

| Contributor Name | Date | Amount | Election |
|-------------------------|-------------|---------------|-----------------|
| Fletcher O'Brien, Lynne | 12/30/19 | \$100.00 | P2020 |
| Munoz, Maria | 10/22/19 | \$1,000.00 | P2020 |
| Waldo, Mary Helen | 10/22/19 | \$450.00 | P2020 |