

# HOLTZMAN VOGEL JOSEFIK PLLC

Attorneys at Law

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Warrenton, VA 20186  
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January 28, 2014

Office of General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re: *Sua Sponte* Submission

PRE-MUR # 570

OFFICE OF GENERAL COUNSEL  
FEDERAL ELECTION COMMISSION  
2014 JAN 29 PM 3:14

Dear Office of General Counsel,

The Republican Party of Florida, by and through the undersigned counsel, does hereby bring the following matter to the attention of the Federal Election Commission pursuant to the Commission's Policy Regarding Self-Reporting of Campaign Finance Violations (*Sua Sponte* Submissions), 72 Fed. Reg. 16,695 (April 5, 2007).

Between December 6, 2013, and January 17, 2014, the Republican Party of Florida, made eleven (11) independent expenditures in connection with the March 11, 2014 special general election in Florida's 13th Congressional District, but failed to report these expenditures on 48-hour notification reports. A 48-hour report reflecting these independent expenditures was filed on January 28, 2014. A copy of this report is attached. These expenditures will also be reflected on the Party's January 31, 2014 Year-End report.

The independent expenditures at issue are detailed below:

1419029426

<b>Date</b>	<b>Payee</b>	<b>Purpose</b>	<b>Amount</b>
12/06/2013	Political Ink, LLC	IE Mail Piece	\$22,584.29
12/06/2013	Political Ink, LLC	IE Mail Piece	\$15,502.90
12/13/2013	Political Ink, LLC	IE Mail Piece	\$23,150.79
12/13/2013	Political Ink, LLC	IE Mail Piece	\$16,069.40
12/19/2013	Political Ink, LLC	IE Mail Piece	\$15,786.15
12/19/2013	Political Ink, LLC	IE Mail Piece	\$22,867.54
01/10/2014	Political Ink, LLC	IE Mail Piece	\$30,599.06
01/10/2014	Political Ink, LLC	IE Mail Piece	\$15,827.90
01/10/2014	Political Ink, LLC	IE Mail Piece	\$3,183.87
01/17/2014	Political Ink, LLC	IE Mail Piece	\$15,549.62
01/17/2014	Political Ink, LLC	IE Mail Piece	\$32,783.54

We note that six of these expenditures were made before President Obama signed the new administrative fines legislation (H.R. 3487) into law on December 26, 2013, and five were made after that date. It is our understanding that the new law extends the administrative fines program to a state political party committee's independent expenditure report filings. We request that this entire matter be considered within the administrative fines program.

The failure to file these reports was an inadvertent oversight. Working with our firm, the Republican Party of Florida has reviewed its internal procedures, implemented processes to ensure that all expenditures are brought to the attention of the appropriate personnel in a timely manner, and worked to train its staff about the importance of these reports. The Party is confident that it now has in place processes that will ensure that independent expenditure reports are timely filed in the future.

The Republican Party of Florida intends to cooperate fully with the Commission in resolving this matter.

Sincerely,



Jason Torchinsky  
Michael Bayes  
Lauren Battey

Counsel to the Republican Party of Florida

Enclosure

14190294A27

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

PAGE 1 OF 6 FOR SE OF FORM 24/48

NAME OF COMMITTEE (In Full) Republican Party of Florida
FEC IDENTIFICATION NUMBER C C00099259
Check if 24-hour report 48-hour report New report Amends report filed on 01 / 28 / 2014

Full Name of Payee Political Ink, LLC
Mailing Address 2924 Bells Road
City Richmond State VA Zip Code 23234-
Purpose of Expenditure Mail Piece Category/Type
Name of Federal Candidate ALEX SINK Support Oppose Office Sought: House District: 13 State: FL
Calendar Year-To-Date Per Election for Office Sought 213905.06
Disbursement For: Other (specify) General

Full Name of Payee Political Ink, LLC
Mailing Address 2924 Bells Road
City Richmond State VA Zip Code 23234-
Purpose of Expenditure Mail Piece Category/Type
Name of Federal Candidate ALEX SINK Support Oppose Office Sought: House District: 13 State: FL
Calendar Year-To-Date Per Election for Office Sought 213905.06
Disbursement For: Other (specify) General

Table with 3 rows: (a) SUBTOTAL of Itemized Independent Expenditures 45451.83, (b) SUBTOTAL of Unitemized Independent Expenditures, (c) TOTAL Independent Expenditures

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.
Signature: Jeff Howell Date: 01 / 28 / 2014

14190294428

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

NAME OF COMMITTEE (In Full) Republican Party of Florida
FEC IDENTIFICATION NUMBER C C00099259
Check if [ ] 24-hour report [X] 48-hour report [X] New report [ ] Amends report filed on 01 / 28 / 2014

Full Name of Payee Political Ink, LLC
Mailing Address 2924 Bells Road
City Richmond State VA Zip Code 23234-
Purpose of Expenditure Mail piece Category/ Type
Name of Federal Candidate ALEX SINK [ ] Support [X] Oppose Office Sought: [X] House District: 13 State: FL
Calendar Year-To-Date Per Election for Office Sought 213905.06
Disbursement For: [ ] Primary [ ] General 2014 [X] Other (specify) General

Full Name of Payee Political Ink, LLC
Mailing Address 2924 Bells Road
City Richmond State VA Zip Code 23234-
Purpose of Expenditure Mail Piece Category/ Type
Name of Federal Candidate ALEX SINK [ ] Support [X] Oppose Office Sought: [X] House District: 13 State: FL
Calendar Year-To-Date Per Election for Office Sought 213905.06
Disbursement For: [ ] Primary [ ] General 2014 [X] Other (specify) General

Table with 3 rows: (a) SUBTOTAL of Itemized Independent Expenditures 31289.05, (b) SUBTOTAL of Unitemized Independent Expenditures, (c) TOTAL Independent Expenditures

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.
Signature: Jeff Howell [Electronically Filed] Date: 01 / 28 / 2014

14190294429

**24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES**  
(Schedule E)

NAME OF COMMITTEE (In Full) <b>Republican Party of Florida</b>	FEC IDENTIFICATION NUMBER ▼ <b>C C00099259</b>
Check if <input type="checkbox"/> 24-hour report <input checked="" type="checkbox"/> 48-hour report <input checked="" type="checkbox"/> New report <input type="checkbox"/> Amends report filed on	
M M / D D / Y Y Y Y 01 / 28 / 2014	

Full Name of Payee <b>Political Ink, LLC</b>	Date of Public Distribution/Dissemination M M / D D / Y Y Y Y 12 / 13 / 2013
Mailing Address <b>2924 Bells Road</b>	Amount 23150.79
City <b>Richmond</b> State <b>VA</b> Zip Code <b>23234-</b>	Transaction ID : <b>31211.E195276</b> Date of Disbursement or Obligation M M / D D / Y Y Y Y
Purpose of Expenditure Mail Piece      Category/Type	Name of Federal Candidate <b>ALEX SINK</b> <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
Calendar Year-To-Date Per Election for Office Sought 213905.06	Office Sought: <input checked="" type="checkbox"/> House    District: <u>13</u> <input type="checkbox"/> President <input type="checkbox"/> Senate    State: <u>FL</u>
Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) ► <u>General</u>	

Full Name of Payee <b>Political Ink, LLC</b>	Date of Public Distribution/Dissemination M M / D D / Y Y Y Y 12 / 13 / 2013
Mailing Address <b>2924 Bells Road</b>	Amount 16069.40
City <b>Richmond</b> State <b>VA</b> Zip Code <b>23234-</b>	Transaction ID : <b>31211.E195277</b> Date of Disbursement or Obligation M M / D D / Y Y Y Y
Purpose of Expenditure Mail Piece      Category/Type	Name of Federal Candidate <b>ALEX SINK</b> <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
Calendar Year-To-Date Per Election for Office Sought 213905.06	Office Sought: <input checked="" type="checkbox"/> House    District: <u>13</u> <input type="checkbox"/> President <input type="checkbox"/> Senate    State: <u>FL</u>
Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) ► <u>General</u>	

(a) SUBTOTAL of Itemized Independent Expenditures..... ►	39220.19
(b) SUBTOTAL of Unitemized Independent Expenditures ..... ►	:
(c) TOTAL Independent Expenditures..... ►	:

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Signature Jeff Howell      [Electronically Filed]      Date M M / D D / Y Y Y Y  
 01 / 28 / 2014

14190294430

**24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES**  
(Schedule E)

NAME OF COMMITTEE (In Full) <b>Republican Party of Florida</b>	FEC IDENTIFICATION NUMBER ▼ <b>C C00099259</b>
Check if <input type="checkbox"/> 24-hour report <input checked="" type="checkbox"/> 48-hour report <input checked="" type="checkbox"/> New report <input type="checkbox"/> Amends report filed on	
M M / D D / Y Y Y Y 01 28 2014	

Full Name of Payee <b>Political Ink, LLC</b>	Date of Public Distribution/Dissemination M M / D D / Y Y Y Y 01 10 2014
Mailing Address <b>2924 Bells Road</b>	Amount 30599.06 Transaction ID : <b>40121.E196535</b> Date of Disbursement or Obligation M M / D D / Y Y Y Y
City State Zip Code Richmond VA 23234-	
Purpose of Expenditure Mail Piece Category/Type	
Name of Federal Candidate <b>ALEX SINK</b>	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose Office Sought: <input checked="" type="checkbox"/> House District: <u>13</u> <input type="checkbox"/> President <input type="checkbox"/> Senate State: <u>FL</u>
Calendar Year-To-Date Per Election for Office Sought 213905.06	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) ▶ <u>General</u>

Full Name of Payee <b>Political Ink, LLC</b>	Date of Public Distribution/Dissemination M M / D D / Y Y Y Y 01 17 2014
Mailing Address <b>2924 Bells Road</b>	Amount 15549.62 Transaction ID : <b>40121.E196632</b> Date of Disbursement or Obligation M M / D D / Y Y Y Y
City State Zip Code Richmond VA 23234-	
Purpose of Expenditure Mail Piece Category/Type	
Name of Federal Candidate <b>ALEX SINK</b>	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose Office Sought: <input checked="" type="checkbox"/> House District: <u>13</u> <input type="checkbox"/> President <input type="checkbox"/> Senate State: <u>FL</u>
Calendar Year-To-Date Per Election for Office Sought 213905.06	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) ▶ <u>General</u>

(a) <b>SUBTOTAL</b> of Itemized Independent Expenditures.....▶	46148.68
(b) <b>SUBTOTAL</b> of Unitemized Independent Expenditures.....▶	:
(c) <b>TOTAL</b> Independent Expenditures.....▶	:

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

*Jeff Howell*  
 Signature [Electronically Filed] Date

M M / D D / Y Y Y Y  
 01 28 2014

14190294431

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

NAME OF COMMITTEE (In Full) Republican Party of Florida
FEC IDENTIFICATION NUMBER C C00099259

Check if 24-hour report 48-hour report New report Amends report filed on 01 28 2014

Full Name of Payee Political Ink, LLC
Mailing Address 2924 Bells Road
City Richmond State VA Zip Code 23234-
Purpose of Expenditure Mail Piece Category/Type
Date of Public Distribution/Dissemination 01 10 2014
Amount 15827.90
Transaction ID: 40121.E196536
Date of Disbursement or Obligation

Name of Federal Candidate ALEX SINK
Support Oppose
Office Sought: House District: 13
President Senate State: FL

Calendar Year-To-Date Per Election for Office Sought 213905.06
Disbursement For: 2014 Other (specify) General

Full Name of Payee Political Ink, LLC
Mailing Address 2924 Bells Road
City Richmond State VA Zip Code 23234-
Purpose of Expenditure Mail Piece Category/Type
Date of Public Distribution/Dissemination 01 17 2014
Amount 32783.54
Transaction ID: 40121.E196631
Date of Disbursement or Obligation

Name of Federal Candidate ALEX SINK
Support Oppose
Office Sought: House District: 13
President Senate State: FL

Calendar Year-To-Date Per Election for Office Sought 213905.06
Disbursement For: 2014 Other (specify) General

Table with 3 rows: (a) SUBTOTAL of Itemized Independent Expenditures 48611.44, (b) SUBTOTAL of Unitemized Independent Expenditures, (c) TOTAL Independent Expenditures

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.
Signature: Jeff Howell [Electronically Filed] Date: 01 28 2014

14190294432

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

NAME OF COMMITTEE (In Full) Republican Party of Florida
FEC IDENTIFICATION NUMBER C C00099259

Check if 24-hour report 48-hour report New report Amends report filed on 01 28 2014

Full Name of Payee Political Ink, LLC
Mailing Address 2924 Bells Road
City Richmond State VA Zip Code 23234-
Purpose of Expenditure Mail Piece Category/Type
Date of Public Distribution/Dissemination 01 10 2014
Amount 3183.87
Transaction ID: 40121.E196537
Date of Disbursement or Obligation

Name of Federal Candidate ALEX SINK
Support Oppose
Office Sought: House District: 13
President Senate State: FL
Calendar Year-To-Date Per Election for Office Sought 213905.06
Disbursement For: 2014 Other (specify) General

Full Name of Payee
Mailing Address
City State Zip Code
Purpose of Expenditure Category/Type
Date of Public Distribution/Dissemination
Amount
Date of Disbursement or Obligation
Name of Federal Candidate
Support Oppose
Office Sought: House District:
President Senate State:
Calendar Year-To-Date Per Election for Office Sought
Disbursement For: Primary General
Other (specify)

Table with 3 rows: (a) SUBTOTAL of Itemized Independent Expenditures 3183.87; (b) SUBTOTAL of Unitemized Independent Expenditures; (c) TOTAL Independent Expenditures 213905.06

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.
Signature: Jeff Howell [Electronically Filed] Date: 01 28 2014

14190294433



FEDERAL ELECTION COMMISSION  
 999 E Street, NW  
 Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL  
 Please use one form for each Respondent/Entity/Treasurer  
 FAX (202) 219-3923

MUR # <sup>\*\*\*</sup> \_\_\_\_\_

NAME OF COUNSEL: Jason Torchinsky, Michael Bayes, Lauren Battey

FIRM: Holtzman Vogel Josefiak PLLC

ADDRESS: 45 North Hill Drive, Suite #100

Warrenton, VA 20186

TELEPHONE- OFFICE ( 540 ) 341-8808

FAX ( 540 ) 341-8809

\*\*\* Matter pertaining to 48-hour independent expenditure reports submitted on January 28, 2014.

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

1/28/14  
Date

[Signature]  
Respondent/Agent - Signature

Executive Director  
Title (Treasurer/Candidate/Owner)

NAMED RESPONDENT: Republican Party of Florida

MAILING ADDRESS: 420 E. Jefferson Street  
 (Please Print)

Tallahassee, FL 32301

TELEPHONE- HOME ( \_\_\_\_\_ ) \_\_\_\_\_

BUSINESS ( 866 ) 222-7920

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation

14190294434