

15L-08

REPORTS ANALYSIS DIVISION REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: April 15, 2015

ANALYST: Jill Sugarman

I. COMMITTEE: Friends of George Demos  
C00549816  
Robert Cole, Treasurer  
P.O. Box 378  
Ronkonkoma, NY 11779

II. RELEVANT STATUTES: 52 U.S.C. 30116(a)  
11 CFR § 102.9(e)  
11 CFR § 110.1(b)

III. BACKGROUND:

**Excessive, Prohibited and Other Impermissible Contributions (Failure to Refund or Redesignate General Election Contributions within the Permissible Timeframe after the Candidate's Primary Election Loss)**

Friends of George Demos ("the Committee") received 2014 General Election contributions from twenty (20) individuals that were not refunded or redesignated within the permissible timeframe from the date George Demos ("the Candidate") lost in the 2014 Primary Election. The contributions total \$46,400.00 as disclosed on the 2013 Year-End, 2014 April Quarterly, and 2014 12 Day Pre-Primary Reports (Attachment 2).

2013 Year-End Report

On January 31, 2014, the Committee filed the 2013 Year-End Report covering the period from October 1, 2013 to December 31, 2013 (Image 14940307874). This report disclosed the receipt of \$42,000.00 in General Election contributions from sixteen (16) individuals.

On May 12, 2014, the Committee filed an Amended 2013 Year-End Report (Image 14960886246). This report disclosed the receipt of \$39,400.00 in General Election contributions from sixteen (16) individuals (Attachment 2).

On January 30, 2015, the Committee filed the 2014 Year-End Report covering the period from October 1, 2014 to December 31, 2014 (Image 15970152624). This report disclosed the refunds of \$39,400.00 in General Election contributions from sixteen (16) individuals that were made outside of the permissible timeframe (Attachment 2).

#### 2014 April Quarterly Report

On April 15, 2014, the Committee filed the 2014 April Quarterly Report covering the period from January 1, 2014 to March 31, 2014 (Image 14960795252). This report disclosed the receipt of a \$400.00 General Election contribution from one (1) individual (Attachment 2).

On July 16, 2014, the Committee filed an Amended 2014 April Quarterly Report (Image 14961641764). This report disclosed no change regarding the receipt of General Election contributions.

On January 30, 2015, the Committee filed the 2014 Year-End Report covering the period from October 1, 2014 to December 31, 2014 (Image 15970152624). This report disclosed the refund of a \$400.00 General Election contribution from one (1) individual that was made outside of the permissible timeframe (Attachment 2).

#### 2014 12 Day Pre-Primary Report

On June 12, 2014, the Committee filed the 2014 12 Day Pre-Primary Report covering the period from April 1, 2014 to June 4, 2014 (Image 14961258753). This report disclosed the receipt of \$2,600.00 in General Election contributions from two (2) individuals.

On June 24, 2014, the Candidate lost in the Primary Election for New York's 1<sup>st</sup> Congressional District.

On July 15, 2014, the Committee filed the 2014 July Quarterly Report covering the period from June 5, 2014 to June 30, 2014 (Image 14961636487).

On October 21, 2014, a Request for Additional Information ("RFAI") was sent to the Committee referencing the 2014 July Quarterly Report. Among other issues, it noted the Committee's receipt of General Election contributions throughout the 2013-2014 election cycle and requested that the Committee refund the contributions since the Candidate would not participate in the General Election (Image 14330062773).

On November 3, 2014, the Committee filed an Amended 2014 12 Day Pre-Primary Report (Image 14952568336). This report disclosed the receipt of \$6,600.00 in General Election contributions from four (4) individuals (Attachment 2).

On November 25, 2014, the Committee filed an Amended 2014 July Quarterly Report. Within that report, the Committee provided a Miscellaneous Electronic Submission (Form 99) in response to the RFAI, dated October 21, 2014. The Form 99 stated, in full: "In response to Item 1 on the FEC Request for Additional Information dated October 21, 2014, all General Election contributions were refunded on October 1, 2014, and will be reflected in the Year End Report" (Image 14952617606).

On multiple occasions between September 29, 2014 and January 13, 2015, the Reports Analysis Division (RAD) Analyst spoke to the Treasurer, Robert Cole, regarding the General Election contributions received during the 2013-2014 election cycle. The Analyst explained that General Election contributions not refunded or refunded late would be referred for further Commission action. The Analyst encouraged the Committee to take additional corrective action and provide an explanation for the public record (Attachment 3).

On January 30, 2015, the Committee filed the 2014 Year-End Report covering the period from October 1, 2014 to December 31, 2014 (Image 15970152624). This report disclosed the refunds of \$6,600.00 in General Election contributions from four (4) individuals that were made outside of the permissible timeframe (Attachment 2).

To date, no further communication has been received from the Committee regarding this matter.

O-Index (2015-2016)															
Cmte. Type: H (HOUSE)			Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE)			Filing Frequency: QUARTERLY FILER									
FormTp	RptTp	All	RecptDt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
F3N	Q1	N	4/12/2015	10	15970337539	1/1/2015	3/31/2015		\$9	30	\$0	\$9	\$2,500,000	\$2,500,000	
Totals									\$0	\$0					

O-Index (2013-2014)															
Cmte. Type: H (HOUSE)			Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE)			Filing Frequency: QUARTERLY FILER									
FormTp	RptTp	All	RecptDt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
RQ2	YE	N	4/8/2014	5	14330048227	10/1/2013	12/31/2013	4/8/2014							
RO2	12P	N	9/28/2014	5	14330061548	4/1/2014	6/4/2014	9/28/2014							
RQ2	12P	N	9/28/2014	5	14330062777	4/1/2014	6/4/2014	9/28/2014							
F3N	Q3	N	10/3/2013	8	13941680633	7/1/2013	9/30/2013		\$0	\$1,000,000	\$0	\$1,000,000	\$0	\$1,000,000	
F3A	YE	A	5/12/2014	79	14950886248	10/1/2013	12/31/2013		\$1,000,000	\$1,198,910	\$149,121	\$2,049,788	\$2,000,000	\$2,000,000	
F3A	Q1	A	7/16/2014	58	14951641764	1/1/2014	3/31/2014		\$2,049,788	\$35,245	\$815,688	\$1,269,346	\$2,000,000	\$2,000,000	
F3A	12P	A	11/3/2014	90	14952558336	4/1/2014	6/4/2014		\$1,269,346	\$59,470	\$945,027	\$383,769	\$2,000,000	\$2,000,000	
F3A	Q2	A	11/15/2014	92	14951686456	5/3/2014	6/30/2014		\$383,769	\$507,280	\$387,455	\$383,769	\$2,000,000	\$2,000,000	
F3A	Q2	A	11/25/2014	46	14952617602	6/5/2014	6/30/2014		\$383,769	\$507,280	\$827,445	\$63,624	\$2,750,000	\$2,500,000	
F3N	Q3	N	10/15/2014	9	14978402558	7/1/2014	9/30/2014		\$61,824	\$0	\$61,800	\$61,824	\$2,500,000	\$2,500,000	
F3N	YE	N	13/0/2015	20	15970152624	10/1/2014	12/31/2014		\$61,824	\$0	\$61,815	\$59	\$2,500,000	\$2,500,000	
F2		N	9/25/2013	3	13031120504										
F1		N	9/25/2013	6	13031120504										
F6N			8/12/2014	1	14951685951										
Totals									\$2,800,905	\$2,800,895					

O-Index (2011-2012)															
Cmte. Type: H (HOUSE)			Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE)			Filing Frequency: QUARTERLY FILER									
FormTp	RptTp	All	RecptDt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	-Debts & Loans
F2		N	8/8/2011	2	11030651802										
Totals									\$0	\$0					

1-0-1-0-0-0-2-8-7-6  
**Friends of George Demos (C00549816)**

2014 General Election Contributions Not Refunded/Redesignated Within Permissible Timeframe, Listed by Contributor

Contributor Name	Date	Amount	Amount Not Refunded Within Timeframe	Refunded Outside of Timeframe	Refunded # Days After 6/24/14 Primary
Bardis, Katherine	12/18/13	\$400.00	\$400.00	\$400.00	100
Chacopoulos, Patricia	5/13/14	\$2,600.00	\$2,600.00	\$2,600.00	100
Jaharis, Mary	5/20/14	\$400.00	\$400.00	\$400.00	100
Jaharis, Michael	5/20/14	\$2,600.00	\$2,600.00	\$2,600.00	100
Marcus, George	11/25/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Pappas, Cathy	12/13/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Pappas, Irene	12/12/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Pappas, James	12/12/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Pappas, Lisa	12/12/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Pappas Jr, Peter J	12/12/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Pappas Sr, Peter J	12/13/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Stanek, John	12/15/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Tavlarides, Christopher	3/18/14	\$400.00	\$400.00	\$400.00	100
Tavlarides, Christopher	4/18/14	\$1,000.00	\$1,000.00	\$1,000.00	100
Tsakopoulos, Angelo	12/30/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Tsakopoulos, Athena	12/30/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Tsakopoulos, Brianne	12/27/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Tsakopoulos, Katina	12/30/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Tsakopoulos, Kyriakos	12/20/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Tsakopoulos, Sofia	12/30/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Tsakopoulos-Kounalakis, Eleni	12/17/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Total Amount Not Refunded/Redesignated within Permissible Timeframe:					\$46,400.00

Attachment 2

1610030287  
**Friends of George Demos (C00549816)**

2014 General Election Contributions Not Refunded/Redesignated Within Permissible Timeframe, Listed by Report

Contributor Name	Date	Amount	Amount Not Refunded Within Timeframe	Refunded Outside of Timeframe	Refunded # Days After 6/24/14 Primary
<b>2013 Year-End Report</b>					
Bardis, Katherine	12/18/13	\$400.00	\$400.00	\$400.00	100
Marcus, George	11/25/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Pappas, Cathy	12/13/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Pappas, Irene	12/12/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Pappas, James	12/12/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Pappas, Lisa	12/12/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Pappas Jr, Peter J	12/12/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Pappas Sr, Peter J	12/13/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Stanck, John	12/15/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Tsakopoulos, Angelo	12/30/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Tsakopoulos, Athena	12/30/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Tsakopoulos, Brianne	12/27/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Tsakopoulos, Katina	12/30/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Tsakopoulos, Kyriakos	12/20/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Tsakopoulos, Sofia	12/30/13	\$2,600.00	\$2,600.00	\$2,600.00	100
Tsakopoulos-Kounalakis, Eleni	12/17/13	\$2,600.00	\$2,600.00	\$2,600.00	100
<b>2014 April Quarterly Report</b>					
Tavlarides, Christopher	3/18/14	\$400.00	\$400.00	\$400.00	100

Attachment 2

2014-12-Day Pre-Primary Report					
Chacopulos, Patricia	5/13/14	\$2,600.00	\$2,600.00	\$2,600.00	100
Tavlarides, Christopher	4/18/14	\$1,000.00	\$1,000.00	\$1,000.00	100
Jaharis, Mary	5/20/14	\$400.00	\$400.00	\$400.00	100
Jaharis, Michael	5/20/14	\$2,600.00	\$2,600.00	\$2,600.00	100
<b>Total Amount Not Refunded/Redesignated within Permissible Timeframe:</b>					
				<b>\$46,400.00</b>	

Attachment 2