

**RECEIVED**

By Office of the Commission Secretary at 5:30 pm, Feb 09, 2021

**SENSITIVE**

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**MEMORANDUM**

February 9, 2021

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista J. Roche *KJR*  
Director, ADR Office

SUBJECT: Informational Memo on Assignment  
ADR 991 – Leon County Democratic Executive Committee and  
Kevin Richard Carpenter, Treasurer (C00766964)

The Office of General Counsel (OGC) transferred P-MUR 647 for processing on January 19, 2021, and the ADR Office designated the referral ADR 991. This office intends to notify Respondents after five business days. If you have any questions or concerns, please contact the ADR Office.

**Summary of Case:** On December 14, 2020, John Hedrick of the Leon County Democratic Executive Committee (the Committee or Respondent) filed a *sua sponte* submission stating that the Committee should have registered and reported as political committee by September 2020, after it had raised over \$5,000 in contributions and made \$33,617 in independent expenditures for mailings in support of federal candidates during the 2020 general election. The Committee asserts that, as a county-level party organization, it was unaware that its activities would trigger federal reporting obligations. The Committee also states that it did not accept any prohibited contributions. The Committee asserts that other spending during the 2020 pre-primary for fundraising flyers and for radio and Facebook ads are not expenditures because the former qualifies for the slate card exemption and the latter as GOTV activity. Finally, the Committee states it has taken corrective action by having its records reviewed, consulting with the Florida Democratic Party, and proposing changes to its bylaws to require compliance with Florida and federal campaign finance law. Subsequent to its submission, the Committee filed a Form 1 on January 21, 2021, and has begun reporting with the FEC.

Informational Memo on Assignment  
ADR 991 (P-MUR 647)