



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 17, 2021

Kevin Carpenter, Treasurer  
P.O. Box 1751  
Tallahassee, FL 32302

**Response Due Date**  
**March 10, 2021**

Re: ADR 991 (P-MUR 647) Leon County Democratic Executive Committee  
and Kevin Carpenter, Treasurer

Dear Kevin Carpenter:

The Federal Election Commission (FEC or Commission) referred a compliance issue to the FEC's Alternative Dispute Resolution Office (ADR Office) for processing. The referral by the Office of General Counsel was based on a *sua sponte* submission filed on December 14, 2021.

The FEC established the ADR Program to provide an informal means for resolving matters that come before the Commission and to facilitate negotiations directly with Leon County Democratic Executive Committee and Kevin Carpenter, Treasurer (Respondents or the Committee). The ADR Program provides Respondents with an opportunity to negotiate settlement of a matter that is mutually agreeable. The negotiations occur prior to any Commission consideration of whether there is reason to believe a violation has occurred. If negotiations are successful, the resulting settlement would conclude the matter.

The Commission, in referring the matter to the ADR Office, determined that the case is eligible for processing in the ADR program. If Respondents decide to participate in the ADR Program, you must: 1) indicate in writing a willingness to have your case submitted for ADR processing; 2) agree to participate in the bilateral interest based negotiations; and 3) waive the statute of limitations while the matter is being processed under the FEC's ADR program.

The issues referred to the ADRO, and the focus of our subsequent negotiations are summarized as follows:

**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

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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.

If after reviewing this letter and the enclosed ADR Frequently Asked Questions, which describe the ADR program, Respondent(s) would like to participate in ADR processing, you need to affirmatively indicate that on the enclosed Commitment to Submit Matter to ADR form. **Failure to respond affirmatively within fifteen (15) business days from the date of this letter will be taken as a notice of disinterest in the program and your case will be dropped from further consideration for ADR.** In that event, your case will be sent to the FEC's Office of General Counsel for further processing, and the likelihood that the Committee will be audited during the next election cycle will increase.

This matter has been designated as **ADR 991**. Please refer to this number in future correspondence with the FEC. If you have questions about the ADR Program, please contact the ADRO at my direct dial as indicated below

Sincerely,

A handwritten signature in black ink, appearing to read "K. Roche", with a horizontal line extending to the right.

Krista J. Roche  
Director  
Alternative Dispute Resolution Office