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COMMISSION

2011 MAR 29 AM 11:48

Lanneau H. Siegling, Sr.

Sullivan's Island, SC 29482

OFFICE OF GENERAL
COUNSEL
March 22, 2011

Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

MUR # 6464

RE: Complaint Against South Carolina Democratic Party

Dear Sir or Madam:

My name is Lanneau H. Siegling, Sr. I am a citizen of and registered voter in the State of South Carolina. I write to alert the Commission of what I believe to be a violation of the restrictions on soft money expenditures on "Federal Election Activities" by the South Carolina Democratic Party.

According to the South Carolina Democratic Party's January 10, 2011 filing with the South Carolina Ethics Commission that detailed expenditures from the Party's state operating account, the Party incurred the following state-level expenditures in October 2010:

<u>Date</u>	<u>Vendor</u>	<u>Description of Expenditure</u>	<u>Amount</u>
October 29, 2010	Wampold Strategies	Direct Mail—Party Development	\$16,609.36
October 27, 2010	Mack Crounse Group	Direct Mail—Party Development	\$32,491.13
October 22, 2010	Buying Time, LLC	Direct Mail—Issue Advocacy	\$500,000.00
October 21, 2010	Harris Lithographic	Direct Mail—Party Development	\$7,958.79
October 21, 2010	Mack Crounse Group	Direct Mail—Party Development	\$32,960.00
October 21, 2010	Mount Vernon Printing Company	Direct Mail—Party Development	\$2,088.59
October 18, 2010	Mack Crounse Group	Direct Mail—Party Development	\$33,611.37
October 12, 2010	Mount Vernon Printing Company	Direct Mail—Party Development	\$2,604.23
<u>Total</u> 8 Expenditures			\$628,323.47

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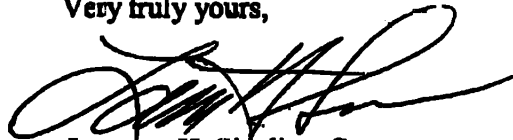
A copy of the South Carolina Democratic Party's filing with the State Ethics Commission, from which the above information was obtained, is attached for your reference.

According to the Federal Election Commission's website (http://www.fec.gov/pages/bcra/rulemakings/charts_fea_dates_2010.shtml), the period for funding restrictions on the South Carolina Democratic Party's "generic campaign activities" began on March 30, 2010, and ran through November 2, 2010. Similarly, the restrictions on the Party's "voter registration activities" began on July 5, 2010, and also ran through November 2, 2010.

Based on the excessively high costs of these expenditures, the descriptions provided by the South Carolina Democratic Party, and their timing, I believe that these eight expenditures are in violation of the restrictions on soft money expenditures by state political parties contained in 2 U.S.C. § 441i. For instance, the description "Party Development" could only relate to either generic campaign activity or voter registration activity, both of which are Federal Election Activities that may not be financed by nonfederal funds. Based on the Party's filings with the South Carolina Ethics Commission, however, it appears that it has violated this federal restriction on soft money expenditures.

As a result, I ask the Commission to investigate this matter and to penalize the South Carolina Democratic Party in the amount provided for by federal law for these violations. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Very truly yours,



Lanneau H. Siegling, Sr.

Enclosure (South Carolina Democratic Party's January 10, 2011 Operating Account Disclosure
Filed with the South Carolina Ethics Commission)

Sworn and subscribed before me on
March 22, 2011



Notary Public for the State of South Carolina

My Commission expires:

March 17, 2020

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**SC.GOV - SC State Ethics Commission: Public Disclosure and Accountability
Reporting
Individual Reports
Committees**

2011 January 10th

Committee: South Carolina Democratic Party
Committee Type: Political Party Committee
Report: Operating Disclosure
Filing Type: Original
Filing Date: 01/10/2011

Demographic Information

PO Box 5965
Columbia, SC 29250
803.799.7798
Richland County

Report Type

2011 January 10th

Contributions	This Period
A. Individual Contributions or other (+)	\$906,765.87
B. In-Kind Contributions (+)	\$0.00
C. Total Contributions (=)	\$906,765.87

Expenditures	This Period
A. In-Kind Expenditures	\$0.00
B. Expenditures (+)	\$983,325.75
C. Total Expenditures (=)	\$983,325.75

Balance of Contributions	This Period
A. Contributions on Hand (Beginning this Period)	\$83,345.84
B. Total Contributions (This Period) (+)	\$906,765.87
C. Total Expenditures (This Period) (-)	\$983,325.75
D. Contributions On Hand (Period End) (=)	\$6,785.96

Contributions

Date	Contributor	Address	Occupation	Amount
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12/31/2010	Unitemized 100 ore less	PO Box 5965 Columbia, SC 29250		\$204.44
11/23/2010	SCDP - Committee Account	1529 Hampton Avenue Columbia, SC 29250		\$5,862.43
11/3/2010	Richland County Democratic Party	P.O. Box 12038 Columbia, SC 29211		\$2,000.00
11/1/2010	Joseph A Erwin	208 Idonia Dr. Taylors, SC 29687	Advertising/marketing	\$20,000.00
10/29/2010	Richard A Harpootian	1410 Laurel St. Columbia, SC 29202	Attorney	\$14,000.00
10/29/2010	Sheheen for Governor	P.O. Drawer 10 Camden, SC 29021		\$25,000.00
10/29/2010	Sheheen for Governor	P.O. Drawer 10 Camden, SC 29021		\$25,000.00
10/25/2010	The Hyman Law Firm	PO Box 1770 Florence, SC 29503		\$1,000.00
10/28/2010	Kathryn Williams	619 North Main Street Greenville, SC 29601	Attorney	\$10,000.00
10/29/2010	Kathryn Williams	619 North Main Street Greenville, SC 29601	Attorney	\$30,000.00
10/28/2010	York County Democratic Party	P.O. Box 3016 Rock Hill, SC 29732		\$7,500.00
10/27/2010	F. Squared DDM	777 Main Street Fort Worth, TX 76102		\$25,000.00
10/26/2010	Dwight Drake for Governor	PO Box 1090 Columbia, SC 29202		\$25,000.00
10/26/2010	Ohio Democratic Party	340 East Fulton Street Columbus, OH 43215		\$23,000.00
10/26/2010	Pfizer, Inc.	400 Perimeter Ctr. Terrace Atlanta, GA 30345		\$3,500.00
10/26/2010	Walker Legal & Consulting Services	PO Box 949 Lexington, SC 29071		\$5,000.00
10/25/2010	Active Properties Management	PO Box 5714 Columbia, SC 29250		\$199.00

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10/25/2010	Richard A Harpootian	1410 Laurel St. Columbia, SC 29202	Attorney	\$1,000.00
10/25/2010	Lourie for Senate Campaign Fund	P.O. Box 6212 Columbia, SC 29260		\$20,000.00
10/25/2010	Ann M Micke	PO Box 18751 Rock Hill, SC 29731	Attorney	\$1,000.00
10/25/2010	SC Democratic Senate Caucus	P.O. Box 11484 Columbia, SC 29211		\$20,000.00
10/23/2010	Steinberg Law Firm	57 on the Harbor Drive Mt. Pleasant, SC 29464		\$2,500.00
10/22/2010	Mia Butler for SC House	PO Box 290692 Columbia, SC 29229		\$8,000.00
10/22/2010	SC House Democratic Caucus	P.O. Box 573 St. George, SC 29477		\$9,000.00
10/21/2010	Democratic Governors Association	1401 K Street, NW, Suite 200 Washington, DC 20005		\$500,000.00
10/20/2010	Terry Richardson	449 Heathwood St. Barnwell, SC 29812	Attorney	\$5,000.00
10/20/2010	SC Democratic Senate Caucus	P.O. Box 11484 Columbia, SC 29211		\$50,000.00
10/20/2010	Kathryn Williams	619 North Main Street Greenville, SC 29601	Attorney	\$6,500.00
10/14/2010	McLeod for Governor	PO Box 12755 Charleston, SC 29422		\$10,000.00
10/14/2010	McLeod for Governor	PO Box 12755 Charleston, SC 29422		\$1,500.00
10/14/2010	Joseph F Rice	777 Bradburn Drive Mt. Pleasant, SC 29464	Attorney	\$5,000.00
10/12/2010	Fluor Enterprises Inc	One Fluor Daniel Dr Aliso Viejo, CA 92698		\$25,000.00
10/5/2010	SC Democratic Senate Caucus	P.O. Box 11484 Columbia, SC 29211		\$20,000.00
Total				\$906,765.87

Expenditures

Date	Vendor	Address	Description	Amount
12/7/2010	Bank of America	440 Knox Abbott Dr. Cayce, SC 29033	Bank Fee	\$10.00
11/29/2010	SCDP - Federal CC	1529 Hampton Street, Suite 200 Columbia, SC 29201	Transfer to Federal Account	\$500.00
11/23/2010	SCDP - BOA - Federal	1529 Hampton St. Ste 200 Columbia, SC 29201	Transfer to Federal Account	\$18,130.00
11/23/2010	SCDP - Federal CC	1529 Hampton Street, Suite 200 Columbia, SC 29201	Transfer to Federal Account	\$3,200.00
11/18/2010	SCDP - Federal CC	1529 Hampton Street, Suite 200 Columbia, SC 29201	Transfer to Federal Account	\$12,947.63
11/18/2010	SCDP - Federal CC	1529 Hampton Street, Suite 200 Columbia, SC 29201	Transfer to Federal Account	\$15,644.55
11/16/2010	SCDP - BOA - Federal	1529 Hampton St. Ste 200 Columbia, SC 29201	Transfer to Federal Account	\$26,330.35
11/9/2010	Wachovia Bank	1426 Main St. Columbia, SC 29201	Bank Fee	\$121.00
11/5/2010	Bank of America	440 Knox Abbott Dr. Cayce, SC 29033	Bank Fee	\$10.00
11/1/2010	Lexington County Democratic Party	P.O. Box 1806 Lexington, SC 29071	Transfer	\$300.00
11/1/2010	Marion County Democratic Party	P.O. Box 569 Marion, SC 29571-0569	Transfer	\$175.00
11/1/2010	SCDP - BOA - Federal	1529 Hampton St. Ste 200 Columbia, SC 29201	Transfer to Federal Account	\$60,519.74
11/1/2010	SCDP - BOA - Federal	1529 Hampton St. Ste 200 Columbia, SC 29201	Transfer to Federal Account	\$51,000.00
10/31/2010	701 Whaley	701 Whaley Street Columbia, SC 29571	Election Night Watch Party	\$1,500.00
10/29/2010	Alken County Democratic Party	317 Sessions Dr. Aiken, SC 29803	Transfer	\$250.00
10/29/2010	Banco/Bannister Company	PO Box 3427 Columbia, SC 29230	Radio Ads	\$20,000.00
10/29/2010	Bank of America	440 Knox Abbott Dr. Cayce, SC 29033	Bank Fee	\$4.44
10/29/2010	Calhoun County Dem. Party	717 S. Harry C Raysor Dr St. Matthews, SC 29135	Transfer	\$500.00
10/29/2010	Wampold Strategies	429 5th Street, NE Washington, DC 20002	Direct Mail - Party Development	\$16,609.36
10/29/2010	Williamsburg County Democratic Party	29 Willie Millan Drive Kingstree, SC 29556	Transfer	\$500.00

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10/28/2010	Banco/Bannister Company	PO Box 3427 Columbia, SC 29230	Radio Ads	\$12,000.00
10/27/2010	Banco/Bannister Company	PO Box 3427 Columbia, SC 29230	Radio Ads	\$10,000.00
10/27/2010	Mack Crouse Group	2100 N. Beauregard Street, Suite 420 Alexandria, VA 20001	Direct Mail - Party Development	\$32,491.13
10/27/2010	Mark Weiss Associates	PO Box 34407 Bethesda, MD 20827	Bumper Stickers	\$99.00
10/26/2010	Bank of America	440 Knox Abbott Dr. Cayce, SC 29033	Bank Fee	\$12.00
10/26/2010	SCDP - BOA - Federal	1529 Hampton St. Ste 200 Columbia, SC 29201	Transfer to Federal Account	\$22,563.97
10/22/2010	Bank of America	440 Knox Abbott Dr. Cayce, SC 29033	Bank Fee	\$25.00
10/22/2010	Buying Time, LLC	650 Massachusetts Ave, NW Washington, DC 20001	Direct Mail - Issue Advocacy	\$500,000.00
10/21/2010	Bank of America	440 Knox Abbott Dr. Cayce, SC 29033	Bank Fee	\$12.00
10/21/2010	Harris Lithographic	8516 Rainswood Drive Landover, MD 20785	Direct Mail - Party Development	\$7,958.79
10/21/2010	Mack Crouse Group	2100 N. Beauregard Street, Suite 420 Alexandria, VA 20001	Direct Mail - Party Development	\$32,960.00
10/21/2010	Mount Vernon Printing Company	3229 Hubbard Road Landover, MD 20785	Direct Mail - Party Development	\$2,088.59
10/19/2010	Ann B. Smith	2933 Blossom St. Columbia, SC 29205	State Fair Tickets	\$500.00
10/18/2010	Mack Crouse Group	2100 N. Beauregard Street, Suite 420 Alexandria, VA 20001	Direct Mail - Party Development	\$33,611.37
10/18/2010	Mark Weiss Associates	PO Box 34407 Bethesda, MD 20827	Bumper Stickers	\$395.00
10/18/2010	SCDP - BOA - Federal	1529 Hampton St. Ste 200 Columbia, SC 29201	Transfer to Federal Account	\$24,559.60
10/14/2010	Banco/Bannister Company	PO Box 3427 Columbia, SC 29230	Radio Ads	\$50,000.00
10/12/2010	Mount Vernon Printing Company	3229 Hubbard Road Landover, MD 20785	Direct Mail - Party Development	\$2,604.23
10/6/2010	Demary, Jeff	2201 Battleford Road, Apt E Columbia, SC 29210	Sign Delivery	\$200.00
10/4/2010	SCDP - Federal CC	1529 Hampton Street, Suite 200 Columbia, SC 29201	Transfer to Federal Account	\$22,993.00
Total				\$983,325.75