



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

OCT 24 2014

William Todd Long
Todd Long For Congress
339 Carolina Ave., Ste. 210
Winter Park, FL 32789-3150

Re: MUR 6721
William Todd Long, individually, and
Todd Long for Congress and William Todd
Long in his official capacity as treasurer

Dear Mr. Long:

The Federal Election Commission, the regulatory agency that administers and enforces the Federal Election Campaign Act, received a complaint alleging violations of the Act or Commission regulations. A copy of that complaint is enclosed. Although the complaint does not identify you by name, it appears that your activities—individually and in your official capacity as treasurer of your principal campaign committee—may fall within the scope of the alleged violations described in the complaint. You therefore are being provided this notice of the complaint and an opportunity to respond to its allegations, if you wish to do so. *See* 52 U.S.C. § 30109(a)(1) (formerly 2 U.S.C. § 437g(a)(1)).

Specifically, the Commission has received information indicating that, while you were the opponent of Alan Grayson in the 2012 general election to represent the Ninth Congressional District of Florida, you requested that Ms. Beth Steele pay and record a robocall attacking Grayson as well as the translation of that call into Spanish. Allegedly, you provided her with the script for the call, which included a disclaimer that inaccurately stated that the call was paid for by a fictitious group called Women Advocating Respect, an idea that you reportedly conceived. It also allegedly omitted the fact that you authorized the call and paid for a portion of its costs, including the costs of placing its English and Spanish language versions to a list of recipients obtained by you or your committee. If true, these allegations would result in the following violations: (A) failure to disclose an in-kind \$700 contribution by Ms. Steele to your committee in violation of 52 U.S.C. § 30104(b) (formerly 2 U.S.C. § 434(b)); (B) knowing acceptance of \$599.05 in in-kind contributions in excess of the Act's limits from Ms. Steele in light of her unrelated \$2,399.05 in disclosed in-kind contributions in violation of 52 U.S.C. § 30116(f) (formerly 2 U.S.C. § 441a(f)); (C) an incomplete and false disclaimer in violation of 52 U.S.C. § 30120 (formerly 2 U.S.C. § 441d(a)(1)-(3)) and 11 C.F.R. § 110.11(b)(1)-(3), and (D) the possible failure to report additional expenditures relating to the calls in violation of 52 U.S.C. § 30104(b) (formerly 2 U.S.C. § 434(b)). Additionally, based on your experience as a

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third-time candidate and evident knowledge of the Act's requirements regarding the disclosure of contributions, in-kind contributions, and the use of disclaimers, there is potentially a basis to conclude that your alleged actions were knowing and willful, and therefore subject to the enhanced penalties provided by 52 U.S.C. § 30109(a)(5)(B), (6)(C), and (d)(1) (formerly 2 U.S.C. § 437g(a)(5)(B), (6)(C), and (d)(1)).

The Office of General Counsel is reviewing this information to determine whether we should recommend to the Commission that there is reason to believe that you violated the Act or Commission regulations. A "reason to believe" finding is not a finding that any person violated the Act; rather, it means only that the Commission believes a violation may have occurred. In the event the Commission finds that there is reason to believe, it may authorize the Office of General Counsel to conduct an investigation to determine whether, in fact, a violation occurred or to assess the scope of the alleged violation. *See* 52 U.S.C. § 30109(a)(2) (formerly 2 U.S.C. § 437g(a)(2)).

Before we make a recommendation to the Commission, we offer you the opportunity to provide in writing a response to the allegations in the complaint. Should you choose to respond, you may also submit any materials — including documents or affidavits from persons with relevant knowledge — that you believe may be relevant or useful to the Commission's consideration of this matter. The Commission will take into account any additional information you provide in determining whether to find reason to believe that you violated the Act or Commission regulations.

Your response, if you choose to make one, must be submitted in writing within 15 days of this letter's receipt. You should address any response to the Office of General Counsel, and the response should reference MUR 6721. After 15 days, we will make our recommendations to the Commission. The Commission will then consider the recommendations and take appropriate action.

This matter will remain confidential unless you notify the Commission in writing that you wish the matter to be made public. *See* 52 U.S.C. §§ 30109(a)(4)(B) and 30109(a)(12) (formerly 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)). If you intend to be represented by counsel in this matter, please complete the enclosed form and return it to the Commission. You are required to preserve all documents, records, and materials relating to the subject matter of the complaint until we notify you that the Commission has closed its file in this matter. *See* 18 U.S.C. § 1519.

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If you have any questions, please call me at (202) 694-1341 or toll free at 1-800-424-9530. Information is also available on the Commission's website, www.fec.gov.

Sincerely,



Michael A. Columbo
Attorney

1-800-424-9530