



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

NOV. 17 2017

Oakland County Democratic Party
Phillip W. Reid, Treasurer
17100 W. 12 Mile Road, Suite 5
Southfield, MI 48076

Dear Mr. Reid:

The Federal Election Commission ("Commission") has ascertained information in the normal course of carrying out its supervisory responsibilities indicating that Oakland County Democratic Party and you, in your official capacity as treasurer ("Committee"), may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). The Committee has been referred by the Commission to the Office of General Counsel for possible enforcement action under 52 U.S.C. § 30109.¹ Specifically, the Committee has been referred for the following issues that may be in violation of the Act and Commission regulations:

1. 2015 Amended Year-End Report: Schedule A supporting Line 11(a)(i) disclosed the receipt of prohibited contributions totaling \$7,500.00, or 8.5% of the total contributions from individuals. This contribution was received from one (1) labor organization.
2. 2015 November Monthly Report: The report contained mathematical discrepancies on several lines in Column B totaling \$6,639.87.
3. 2015 Amended February Monthly Report: The Committee's report disclosed additional disbursements totaling \$180,866.72 on Schedule B supporting Line 21(b), resulting in an increase of more than 5% and \$10,000.00 over the original report.
4. 2015 Amended March Monthly Report: The Committee's report disclosed additional disbursements totaling \$355,689.84 on Schedule B supporting Line 21(b), resulting in an increase of more than 5% and \$10,000.00 over the original report.
5. 2015 Amended April Monthly Report: The Committee's report disclosed additional disbursements totaling \$225,355.59 on Schedule B supporting Line 21(b), resulting in an increase of more than 5% and \$10,000.00 over the original report.
6. 2015 Amended May Report: The Committee's report disclosed additional disbursements totaling \$35,689.23 on Schedule B supporting Line 21(b), resulting in an increase of more than 5% and \$10,000.00 over the original report.
7. 2015 Amended June Monthly Report: The Committee's report disclosed additional disbursements totaling \$26,860.51 on Schedule B supporting Line 21(b), resulting in an increase of more than 5% and \$10,000.00 over the original report.
8. 2015 February Monthly Report: Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 245 of 365, or 67.1%, of the contributions from individuals that require itemization.
9. 2015 Amended March Monthly Report: Schedule A supporting Line 11(a)(i) failed to

¹ Notification of this referral is being provided to you pursuant to the Commission's Agency Procedure for Notice to Respondents in Non-Complaint Generated Matters, as published in the Federal Register on August 4, 2009 (74 Fed. Reg. 38,617).

- disclose adequate identification for 235 of 341, or 68.9%, of the contributions from individuals that require itemization.
10. 2015 Amended April Monthly Report: Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 383 of 533, or 71.9%, of the contributions from individuals that require itemization.
 11. 2015 Amended May Monthly Report: Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 385 of 542, or 71.0%, of the contributions from individuals that require itemization.
 12. 2015 Amended Year-End Report: Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 784 of 1,435, or 54.6%, of the contributions from individuals that require itemization.
 13. 2016 Amended March Monthly Report: Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 575 of 1,162, or 49.5%, of the contributions from individuals that require itemization.
 14. 2016 Amended April Monthly Report: Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 77 of 1,439, or 53.8%, of the contributions from individuals that require itemization.
 15. 2016 Amended May Monthly Report: Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 962 of 1,834, or 52.5%, of the contributions from individuals that require itemization.
 16. 2016 Amended June Monthly Report: Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 877 of 1,725, or 50.8%, of the contributions from individuals that require itemization.
 17. 2015 Amended February Monthly Report: Schedule B supporting Line 21(b) disclosed thirty-four (34) payments to "Non-Voucher Prize Winners" for the purpose of "Non Voucher Prize Payouts" but failed to itemize the individuals who received payment totaling \$73,353.30.
 18. 2015 Amended March Monthly Report: Schedule B supporting Line 21(b) disclosed forty (40) payments to "Non-Voucher Prize Winners" for the purpose of "Non Voucher Prize Payouts" but failed to itemize the individuals who received payment totaling \$95,831.80.
 19. 2015 Amended April Monthly Report: Schedule B supporting Line 21(b) disclosed twenty-seven (27) payments to "Non-Voucher Prize Winners" for the purpose of "Non Voucher Prize Payouts" but failed to itemize the individuals who received payment totaling \$66,786.40.
 20. 2015 Amended May Monthly Report: Schedule B supporting Line 21(b) disclosed twenty-five (25) payments to "Non-Voucher Prize Winners" for the purpose of "Non Voucher Prize Payouts" but failed to itemize the individuals who received payment totaling \$64,830.40.
 21. 2015 Amended March Monthly Report: Schedule H1 failed to disclose the correct ratio for the allocated federal and non-federal activity.

We have numbered this referral

The Act affords you the opportunity to demonstrate in writing that no action should be taken against Oakland County Democratic Party and you, in your official capacity as treasurer, in this matter. If you wish to file a response, you may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Where appropriate, statements should be submitted under oath by persons with relevant knowledge. Your response,

which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 52 U.S.C. §§ 30109(a)(4)(B) and 30109(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. Please be advised that, although the Commission cannot disclose information regarding an investigation to the public, it may share information on a confidential basis with other law enforcement agencies.²

Please note that you have a legal obligation to preserve all documents, records, and materials relating to the subject matter of the referral until such time as you are notified that the Commission has closed its file in this matter. See 18 U.S.C. § 1519.

Any correspondence sent to the Commission, such as a response, must be addressed to one of the following (note, if submitting via email this Office will provide an electronic receipt by email):

Mail
Federal Election Commission
Office of Complaints Examination
and Legal Administration
Attn: Christal Dennis, Paralegal
999 E Street, NW
Washington, DC 20463

OR **Email**
CELA@fec.gov

If you have any questions, please contact Christal Dennis at (202) 694-1650 or toll free at 1-800-424-9530. For your information, we have enclosed a brief description of the Commission's preliminary procedures for processing possible violations discovered by the Commission.

Sincerely,



Jeff S. Jordan
Assistant General Counsel
Complaints Examination &
Legal Administration

² The Commission has the statutory authority to refer knowing and willful violations of the Act to the Department of Justice for potential criminal prosecution, 52 U.S.C. § 30109(a)(5)(C), and to report information regarding violations of law not within its jurisdiction to appropriate law enforcement authorities. *Id.* § 30107(a)(9).