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April 15, 2022

Via E-MailRoy Q. Lockett, Esq.
Acting Associate General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463**Re: RR 22L-13**

Dear Mr. Lockett:

The undersigned serves as counsel to the Michigan Democratic State Central Committee (“MDSCC”) and Traci Kornak, in her official capacity as Treasurer. I am writing in response to the Commission’s letter of March 30, 2022, in connection with the above-referenced referral.

For the reasons set forth below, the MDSCC respectfully requests that the Office of General Counsel recommend that no further action be taken in this matter or, in the alternative, that this matter be referred to the Alternative Dispute Resolution Division for further proceedings.

This matter relates to a referral from the Commission’s Reports Analysis Division and specifically related to the late refund of excessive contributions. Most of these excessive contributions were due not to direct contributions to the party, but rather, because of joint fundraising allocations, that, in the aggregate, caused an excessive contribution to the committee. Although the MDSCC had procedures in place to handle such situations, a series of miscommunications during a period of unprecedented high volume of contributions caused a delay in processing refunds to these donors.

In response to this problem the MDSCC has taken several steps to ensure that any such contributions are refunded in a timely matter, including real time monitoring of joint fundraising allocations, additional review of data prior to importation into its compliance software, improved digital communication between staff related to these contributions and a more organized workflow between staff and outside consultants related to incoming contributions.

It should be further noted that the Reports Analysis referral included two donors whose excessive contributions appear to have not been remedied. Please note that both donor’s excessive contributions had been remedied in 2021, but due to the small amounts, the remedy was not itemized on MDSCC reports.

Based upon the above, most importantly, the significant resources devoted by the MDSCC to corrective action and the improvement of its internal processes, the Commission should either determine to take no further action in this matter, or, in the alternative, refer this matter to its Alternative Dispute Resolution Division to work with the MDSCC to come up with comprehensive steps to ensure future compliance.

If you have any further questions, please contact me at (202) 479-1111.

Respectfully submitted,



Neil P. Reiff
Counsel for the Michigan Democratic State
Central Committee and Traci Kornak in her
official capacity as Treasurer