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March 30, 2022

Via E-MailRoy Q. Lockett, Esq.
Acting Associate General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463**Re: RR 22L-07**

Dear Mr. Lockett:

The undersigned serves as counsel to the Democratic Executive Committee of Florida Party (“DECF”) and Fran Garcia, in her official capacity as Treasurer. I am writing in response to the Commission’s letter of February 24, 2022, in connection with the above-referenced referral.

For the reasons set forth below, the DECF 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 relates to two issues: 1) additional debts reported by the DECF in connection with its 2020 30 Day Post-General Report and 2) the late refund of excessive contributions.

As a general matter, the DECF faced several challenges during the 2020 election cycle related to its compliance operations and hired a new, outside compliance firm in late 2020 to undertake these services. The new firm has undertaken a comprehensive review of 2020 contributions and disbursements and the amendments filed related to 2020 election cycle reports during the calendar year 2021 are a direct result of their comprehensive review of 2020 cycle activities.

With respect to the unresolved contributions identified in the Reports Analysis Referral, the committee notes that the contribution from Kirkland Hicks was, in fact, initially refunded on September 30, 2020, and was ultimately reissued on September 30, 2021. With respect to the contribution from “unknown”, the committee has been unable to verify the source of this contribution, nor is it able to confirm any refund related to this contribution. Consequently, the DECF has transferred \$500 from its federal account to its non-federal account to mitigate issues related to this contribution.

Based upon the above, most importantly, the significant resources devoted by the DECF to auditing and correcting the committee's 2020 election cycle activities, 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 DECF 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 Democratic Executive
Committee of Florida and Fran Garcia in her
official capacity as Treasurer