



AGENDA DOCUMENT NO. 15-16-A
APPROVED MARCH 19, 2015

MINUTES OF AN OPEN MEETING
OF THE
FEDERAL ELECTION COMMISSION
TUESDAY, MARCH 10, 2015
(ORIGINALLY SCHEDULED FOR MARCH 5, 2015)

PRESENT:

Ann M. Ravel, Chair, presiding

Matthew S. Petersen, Vice Chairman

Lee E. Goodman, Commissioner

Caroline C. Hunter, Commissioner

Steven T. Walther, Commissioner

Ellen L. Weintraub, Commissioner

Alec Palmer, Staff Director

Lisa J. Stevenson, Deputy General Counsel - Law

Shawn Woodhead Werth, Secretary and Clerk

Chair Ann M. Ravel called the Federal Election Commission to order in an open meeting at 1:25 P.M. on Tuesday, March 10, 2015 with a quorum present.

Chair Ravel recognized Vice Chairman Petersen who

MOVED to waive the rules on the timely submission of agenda documents in order to consider Agenda Document Nos. 15-10-B-2 and 15-10-C.

The motion carried by a vote of 6-0 with Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voting affirmatively for the decision.

I. CORRECTION AND APPROVAL OF MINUTES

**Minutes for February 12, 2015
Agenda Document No. 15-14-A**

Chair Ravel recognized Vice Chairman Petersen who

MOVED to approve the minutes for the meeting on February 12, 2015 as set forth in Agenda Document No. 15-14-A.

The motion carried by a vote of 6-0 with Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voting affirmatively for the decision.

II. DRAFT ADVISORY OPINION 2014-20

**Make Your Laws PAC, Inc.
by Sai, President and Treasurer**

(Held over from the February 12, 2015 meeting)

Agenda Document No. 15-10-A (Draft A)

Agenda Document No. 15-10-B (Draft B)

**Agenda Document No. 15-10-B-2 (Revised Draft B)
(Submitted Late)**

**Agenda Document No. 15-10-C (Draft C)
(Submitted Late)**

Chair Ravel recognized Sai, the requestor's representative, who was available by telephone to answer Commissioners' questions.

Chair Ravel recognized Mr. Neven Stipanovic of the General Counsel's Office who provided an update on the matter and asked for authority to make technical and conforming changes if a Draft is approved by the Commission.

Because the Commissioners had just received Draft C, Chair Ravel asked Sai if he would be available to discuss this matter at the next open meeting in order to provide Commissioners with sufficient time to review it. Sai confirmed that he would be available to participate by telephone.

Chair Ravel stated that this matter would be held over to the March 19, 2015 open meeting.

**III. AUDIT DIVISION RECOMMENDATION MEMORANDUM ON THE
REPUBLICAN PARTY OF ORANGE COUNTY (FEDERAL)
(RPOC) (A11-23)**

**Memorandum from the Chief Compliance Officer and
Audit Division dated January 20, 2015**

Agenda Document No. 15-05-A

(Held over from the February 12, 2015 meeting)

**Chair Ravel introduced the matter. Mr. Robert Morcomb of the Audit
Division and Ms. Margaret Forman of the General Counsel's Office participated
in the discussion that followed.**

Chair Ravel recognized Commissioner Weintraub who

**MOVED to approve the Audit Division recommendations
as set forth in the Audit Division Recommendation
Memorandum on the Republican Party of Orange County
(Federal) (RPOC) (A11-23), Agenda Document No. 15-05-A.**

Discussion followed.

**The motion carried by a vote of 6-0 with Commissioners Goodman,
Hunter, Petersen, Ravel, Walther, and Weintraub voting affirmatively for the
decision.**

**IV. AUDIT DIVISION RECOMMENDATION MEMORANDUM ON THE
SOUTH DAKOTA DEMOCRATIC PARTY (SDDP) (A11-20)**

**Memorandum from the Chief Compliance Officer and
Audit Division dated January 29, 2015**

Agenda Document No. 15-11-A

Chair Ravel recognized Mr. Jim Miller of the Audit Division who summarized the five Findings in the Memorandum: 1) misstatement of financial activity; 2) recordkeeping for employees; 3) reporting of coordinated party expenditures; 4) contributions from unregistered political organizations; and 5) disclosure of occupation/name of employer.

Chair Ravel recognized Commissioner Weintraub who

MOVED to approve Finding 1 (Misstatement of Financial Activity), Finding 3 (Reporting of Coordinated Party Expenditures), Finding 4 (Contributions from Unregistered Political Organizations), and Finding 5 (Disclosure of Occupation/Name of Employer) as set forth in Agenda Document No. 15-11-A.

The motion carried by a vote of 6-0 with Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voting affirmatively for the decision.

Chair Ravel recognized Commissioner Weintraub who

MOVED to approve Finding 2 (Recordkeeping for Employees) as set forth in Agenda Document No. 15-11-A subject to an amendment to include the \$17,770 paid to contract workers.

The motion failed by a vote of 3-3 with Commissioners Ravel, Walther, and Weintraub voting affirmatively for the motion. Commissioners Goodman, Hunter, and Petersen dissented.

Chair Ravel recognized Commissioner Weintraub who

MOVED to take the following actions:

- 1. Approve Finding 2 (Recordkeeping for Employees) as set forth in Agenda Document No. 15-11-A related to the \$42,557 that the committee disclosed as having been paid with an allocation of federal and non-federal funds and \$2,399 that was paid from an exclusively non-federal account during the periods in which the employee was also paid with federal funds.**
- 2. Direct the Audit Division to include in the Proposed Final Audit Report an Additional Issues section addressing the \$15,187 for 100% non-federal payments.**

The motion carried by a vote of 6-0 with Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voting affirmatively for the decision.

V. AUDIT DIVISION RECOMMENDATION MEMORANDUM ON THE KENTUCKY STATE DEMOCRATIC CENTRAL EXECUTIVE COMMITTEE (KDC) (A12-05)

Memorandum from the Chief Compliance Officer and Audit Division dated February 3, 2015

Agenda Document No. 15-12-A

Chair Ravel recognized Mr. Scott Dotzler of the Audit Division who introduced the matter.

Chair Ravel recognized Commissioner Weintraub who

MOVED to approve the recommendation for the Recordkeeping for Employees Finding as set forth in Agenda Document No. 15-12-A subject to an amendment to include the \$257,794.78 paid to contract workers.

The motion failed by a vote of 3-3 with Commissioners Ravel, Walther, and Weintraub voting affirmatively for the motion. Commissioners Goodman, Hunter, and Petersen dissented.

Chair Ravel recognized Commissioner Weintraub who

MOVED to take the following actions:

- 1. Approve the recommendation for the Recordkeeping for Employees Finding as set forth in Agenda Document No. 15-12-A related to the \$820,979 that the committee disclosed as having been paid with an allocation of federal and non-federal funds.**
- 2. Direct the Audit Division to include in the Proposed Final Audit Report an Additional Issues section addressing the \$12,283 for 100% non-federal payments.**

The motion carried by a vote of 6-0 with Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voting affirmatively for the decision.

VI. AUDIT DIVISION RECOMMENDATION MEMORANDUM ON THE 2012 DEMOCRATIC NATIONAL CONVENTION COMMITTEE, INC.

Memorandum from the Chief Compliance Officer and Audit Division dated February 6, 2015

Agenda Document No. 15-13-A

Chair Ravel recognized Ms. Camilla Reminsky of the Audit Division who summarized the Finding in the Memorandum concerning net outstanding convention expenses.

Chair Ravel thanked Ms. Reminsky and stated that this matter had been approved by tally vote prior to the meeting.

VII. MANAGEMENT AND ADMINISTRATIVE MATTERS

**There being no further business to come before the Commission,
the meeting adjourned at 1:49 P.M.**

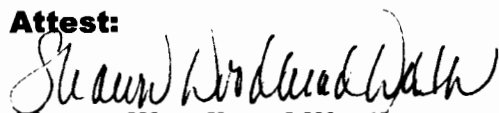
Signed:



Ann M. Ravel

Chair of the Commission

Attest:



Shawn Woodhead Werth

Secretary and Clerk of the Commission