Marco Rubio for US Senate

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April 11, 2015

Jill Sugarman
Senior Campaign Finance & Reviewing Analyst
Federal Election Commission
c/o Secretary of the Senate
232 Hart Senate Office Building
Washington, DC 20510

ID Number: C00458844

Reference: October Quarterly Report (7/1/14-9/30/14)

Dear Ms. Sugarman:

This letter is in response to your request for additional information, dated March 12, 2015.

1. Your letter indicates that the Committee disclosed one or more contributions that appear to exceed the limits set forth in the act. The Committee is aware of the contribution limits. In the case of an individual, if the contribution cannot be presumptively reattributed to a spouse or redesignated to a subsequent election, the Committee either sends a verified reattribution letter or refunds the excessive portion within 60 days of receipt. The Committee sends all presumptive reattribution and redesignation letters within 30 days or receipt and always gives the donor the option of making a change or requesting a refund. When the Committee receives contributions from other political committees that cause an excessive total, the Committee contacts the other political committee and requests a verified redesignation. If this is not received, the Committee issues a refund. The following is a response to each contributor listed in your letter:

Yvonne Berry: The contribution on 8/7/14 was actually for $200, not $2000. This was correctly disclosed on the October Quarterly Report. This donor is not excessive.

Robert Diener: This donor was a duplicate entry in our system. The corrected entry will be disclosed on the April 2015 Quarterly Report. In addition, a refund in the amount of $800 was issued on 3/31/15 and will be disclosed on the April 2015 Quarterly Report.

James Heavener: This donor was a duplicate entry in our system. A refund in the amount of $2000 was issued on 3/31/15 and will be disclosed on the April 2015 Quarterly Report.

Douglas Leone: The excessive portion of the contribution was redesignated on 10/31/14. This was disclosed on the 2014 Year End Report.

Patricia Leone: The excessive portion of the contribution was redesignated on 10/31/14. This was disclosed on the 2014 Year End Report.

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Marco Rubio for US Senate

Thomas Smith: This donor was a duplicate entry in our system. A refund in the amount of $1980 was issued on 3/31/15 and will be disclosed on the April 2015 Quarterly Report.

Dian Graves Stai: A refund in the amount of $7800 was issued on 12/29/14. This was disclosed on the 2014 Year End Report.

Mary Wolf: Refunds in the amount of $250 were issued on 7/28/14 and an additional $1040 refund was issued on 12/23/14. These were disclosed on the October 2014 Quarterly Report and the 2014 Year End Report.

The Committee now de-dupes and performs reviews of the data weekly to identify any excessive contributions that may have been missed during the initial processing. Once excessive contributions are identified, the Committee takes steps to either reattribute, redesignate or refund if necessary. For presumptive reattributions and redesignations, the Committee notifies the contributors in writing within 60 days of receipt and gives the contributor the opportunity to change this designation or request a refund as required by the Commission regulations. For excessive contributions that cannot be presumptively reattributed or redesignated, the excessive portion of the contribution is refunded within 60 days of receipt of the original contribution, with most being issued within the same reporting period.

In addition, we have asked our database vendor to review the files to make sure it has de-duped the records. We have also asked that they retrain their staff to properly input contribution data in the first instance. We are also reviewing our processes to ensure that we are taking every step to avoid these issues in the future.

2. Your letter indicates that the above referenced report discloses contributions that appear to be from a corporation or labor organization. Campos Land Company, Neurosurgical Associates of St. Augustine LLC, Secure Health Tech LLC and Titan Production Company LLC are all partnerships. Partner attribution has been requested and will be disclosed on future reports if it is received.

Sincerely,

Lisa R. Lisker

Lisa Lisker
Assistant Treasurer

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SECRETARY

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