

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

December 20, 2010

ADAM ROZANSKY, TREASURER CLUB FOR GROWTH PAC 2001 L ST NW, SUITE 600 WASHINGTON, DC 20036

IDENTIFICATION NUMBER: C00432260

Response Due Date 01/24/2011

REFERENCE: AUGUST MONTHLY REPORT (07/01/2010 - 07/31/2010)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following $\underline{3}$ item(s):

1. Schedule E of your report indicates that your committee may have failed to timely file one or more of the required 24 hour notices regarding "last minute" independent expenditures (see attached). A political committee must file a 24 hour report with the Federal Election Commission as specified in 11 CFR §104.4(c), within 24 hours of any independent expenditures of \$1,000 or more with respect to a given election, made between two and twenty days before an election. The notice must be received by the Commission by 11:59 p.m. on the day following the date on which independent expenditures that aggregate \$1,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. 11 CFR §104.3(b)

2. Schedule B of your report discloses earmarked contributions totaling \$2,400, with no corresponding entries on Schedule A. Pursuant to 11 CFR §110.6(c), all earmarked contributions, that have passed through a conduit's account, must be itemized on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of the amount. All earmarked contributions that have been forwarded in the form of the contributor's check or written instrument must be itemized as memo entries on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of the amount. Please identify the original contributors for the earmarked contributions disclosed on Schedule B.

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3. Schedule A of your report discloses earmarked contributions totaling \$4,850, with no corresponding entries on Schedule B. Pursuant to 11 CFR \$110.6(c)(1) (v), all earmarked contributions that have passed through a conduit's account must be itemized on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of amount. All earmarked contributions that have been forwarded in the form of the contributor's check or written instrument must be itemized as memo entries on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of the amount. Please amend your report to clarify these discrepancies.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1157.

Sincerely,

Jaura E. Sinran

Laura Sinram Senior Campaign Finance Analyst Reports Analysis Division

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Late 24 Hour Notice (Schedule E):

| Name of Payee | Date | Amount | Purpose | Candidate |
|-----------------|---------|--------------|------------------------|------------------|
| Club for Growth | 7/20/10 | \$83.70 | press release (from | James A. Barnett |
| | | | advance line 21) | |
| Club for Growth | 7/20/10 | \$595.63 | tv ad production costs | James A. Barnett |
| | | | (from advance line 21) | |
| Red Sea, LLC | 7/20/10 | \$109,982.00 | tv ad air buy, | James A. Barnett |
| | | | production costs | |