



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 23, 2017

STEVEN ROSENTHAL, TREASURER
WORKING FOR US POLITICAL ACTION
COMMITTEE INC
1725 I STREET, NW
SUITE 900
WASHINGTON, DC 20006

Response Due Date
04/27/2017

IDENTIFICATION NUMBER: C00430876

REFERENCE: JULY QUARTERLY REPORT (04/07/2016 - 06/30/2016)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 5 item(s):

1. Schedule B of your report discloses reimbursements to individuals for "Reimbursement: Filing Fee." Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information and clearly identify on the Schedule B, which reimbursement each memo entry relates to. If itemization is not necessary, you must indicate so in an amendment to this report. 11 CFR §§104.3(b)(3)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3
2. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "Strategic Services." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf.

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3. Schedule E, supporting Line 24 of your report, discloses an independent expenditure on behalf of Donna Fern Edwards which has been designated for the 2016 Maryland Runoff election. Please be advised that this candidate is not participating in a Runoff election in 2016. Please amend your report to provide further clarifying information regarding this independent expenditure disclosed in support of Donna Fern Edwards. (11 CFR §104.3(b)(3)(vii))

4. Your committee has filed a 24 hour report for an independent expenditure supporting Donna Fern Edwards (see attached) which has not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on 24 hour reports must also be itemized on a corresponding Schedule E or MEMO Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend your report and any subsequent reports that may be affected by this correction. (11 CFR §104.4)

5. Schedule E of your report indicates that your committee may have failed to file one or more of the required 24 hour report(s) 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 report 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))

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**

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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) 694-1185.

Sincerely,

A handwritten signature in black ink that reads "Samantha Hay". The signature is written in a cursive, flowing style.

Samantha Hay
Campaign Finance Analyst
Reports Analysis Division

Missing Schedule E (24 Hour Report)**WORKING FOR US POLITICAL ACTION COMMITTEE INC (C00430876)**

Name of Payee	Dissemination Date	Amount	Candidate	Election
Mundy Katowitz Media, Inc.	4/15/16	\$5,000.00	DONNA FERN EDWARDS	P2016
Mundy Katowitz Media, Inc.	4/15/16	\$539,974.30	DONNA FERN EDWARDS	P2016

*The transactions above appear on two 24 Hour Reports (filed on 4/16/16 and 4/22/16), but only once on Schedule E of this report.

Missing 24 Hour Report (Schedule E)**WORKING FOR US POLITICAL ACTION COMMITTEE INC (C00430876)**

Name of Payee	Dissemination Date	Amount	Candidate	Election
Block by Block	4/21/2016	\$55,000.00	DONNA FERN EDWARDS	P2016
Switchboard Communications	4/21/2016	\$1,356.80	DONNA FERN EDWARDS	P2016
The Strategy Group, Inc.	4/21/2016	\$23,151.68	DONNA FERN EDWARDS	P2016
The Strategy Group, Inc.	4/21/2016	\$9,000.00	DONNA FERN EDWARDS	P2016