



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

July 11, 2008

Joan Steckler, Treasurer  
WomenCount PAC  
1016 Lincoln Blvd., Suite 303  
San Francisco, CA 94129

**Response Due Date:**  
**August 11, 2008**

Identification Number: C00450098

Reference: June Monthly Report (5/1/08-5/31/08)

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 2 items:

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. Your committee has filed a 24 hour notice for an independent expenditure supporting Hillary Clinton (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 notices must also be itemized on a corresponding Schedule E or MEMO

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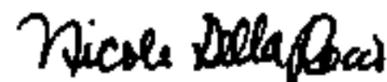
Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend your report and any subsequent reports that may be affected by this correction.

-Schedule B supporting Line 23 discloses contributions to federal candidates for which no election designation has been provided. Please note that if no designation is included in your report, the contributions will be attributed to the next upcoming election for the recipient candidate. Thus, for future reporting purposes, it is in your committee's interest to designate the appropriate election in order to avoid the appearance of excessive contributions made to federal candidates by your committee.

**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) 694-1139.

Sincerely,



Nicole Della Rocco  
Campaign Finance Analyst  
Reports Analysis Division

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## 24 Hour Notice Not Timely Filed

Name of Payee	Date	Amount	24-hour notice	Candidate
The Davis Group, Inc.	5/16/2008	\$16,827.67	5/19/2008	Hillary Clinton

## Missing Expenditures on Schedule E:

Name of Payee	Date	Amount	Purpose	Candidate
The Davis Group, Inc.*	05/25/2008	\$68,373.53	New York Times National Newspaper Advertisement	Hillary Clinton

\* 24-Hour Notices were filed on 5/26/08 and 5/30/08 to disclose two separate payments of \$68,373.53 to "The Davis Group, Inc." However, Schedule E of your report only discloses one payment for \$68,373.53 to this vendor on 5/25/08.

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