



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 15, 2018

THOMAS A. CRAMER, TREASURER  
DEMOCRATIC ADVANCEMENT PAC  
15600 NE 8TH ST B1, BOX 931  
BELLVUE, WA 98008

**Response Due Date**  
**04/19/2018**

IDENTIFICATION NUMBER: C00381517

REFERENCE: YEAR-END REPORT (07/01/2017 - 12/31/2017)

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 enforcement action.** Additional information is needed for the following 2 item(s):

1. Your reports for 2017 contain(s) information disclosed on Schedules H1, and H4. These schedules are used by committees which have separate federal and non-federal accounts to disclose the allocation of funds for expenditures between the two types of accounts. However, your reports do not show payments from a non-federal account on a Schedule H3, as would be customary for committees who allocate between accounts. If your committee does not maintain a non-federal account, all disbursements should be disclosed on a Schedule B and no allocation schedules filed. Please clarify the procedures you are currently using to allocate shared expenses if any, and report future transactions appropriately.

Please note that transfers for allocated activity must be made within a 70-day time period: no more than 10 days before and no more than 60 days after payment to the vendor. (11 CFR §§106.6(e)(2) and 106.7(f)(2))

2. Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 to clarify the following description(s): "Consulting Fee." (11 CFR §§104.3(b)(3) and 104.10(a)(4))

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at:  
<https://www.fec.gov/help-candidates-and-committees/purposes-disbursement>

DEMOCRATIC ADVANCEMENT PAC

Page 2 of 2

**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. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. 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) 694-1133.

Sincerely,



Christopher Morse  
Senior Campaign Finance Analyst  
Reports Analysis Division