



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 15, 2011

NANCY CUSHMAN, TREASURER  
VIACOM INTERNATIONAL, INC. POLITICAL  
ACTION COMMITTEE  
1501 M STREET SUITE 1100  
WASHINGTON, DC 20005

**Response Due Date**  
**04/19/2011**

IDENTIFICATION NUMBER: C00167759

REFERENCE: YEAR-END REPORT (11/23/2010 - 12/31/2010)

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 1 item(s):

- Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §§110.1(d) and 110.2(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

The Commission notes the attached text on your report: "Please note the following six individuals have exceeded their \$5000 contribution limit: Michael Fricklas, Loretha Jones, Debra Lee, Judith McGrath, William Roedy & Andra Shapiro. We will be issuing refund checks and they will be reported as such on our next FEC filing." Please provide the date of this refund and provide a photocopy of the refund check sent to the individual(s).

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

Alternatively, the funds can be retained if within 60 days of receipt you (1)

VIACOM INTERNATIONAL, INC. POLITICAL ACTION COMMITTEE

Page 2 of 3

transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

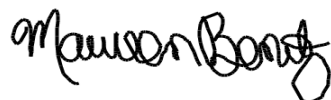
**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions 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) 694-1147.

VIACOM INTERNATIONAL, INC. POLITICAL ACTION COMMITTEE

Page 3 of 3

Sincerely,

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

Maureen Benitz  
Senior Campaign Finance and Reviewing Analyst  
Reports Analysis Division

294

## Excessive Contribution From a Committee/Individual

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Report</b>
Loretha Jones	1/29/2010	\$570	2010 February Monthly
Loretha Jones	2/4/2010	\$380	2010 March Monthly
Loretha Jones	3/2/2010	\$760	2010 April Monthly
Loretha Jones	4/16/2010	\$380	2010 May Monthly
Loretha Jones	5/21/2010	\$380	2010 June Monthly
Loretha Jones	6/30/2010	\$380	2010 July Monthly
Loretha Jones	7/27/2010	\$380	2010 August Monthly
Loretha Jones	8/25/2010	\$570	2010 September Monthly
Loretha Jones	10/12/2010	\$380	2010 12 Day Pre-General
Loretha Jones	10/18/2010	\$760	2010 30 Day Post-General
Loretha Jones	12/16/2010	\$380	2010 Year End
<b>Debra Lee</b>			
Debra Lee	1/29/2010	\$570	2010 February Monthly
Debra Lee	2/4/2010	\$380	2010 March Monthly
Debra Lee	3/2/2010	\$760	2010 April Monthly
Debra Lee	4/16/2010	\$380	2010 May Monthly
Debra Lee	5/21/2010	\$380	2010 June Monthly
Debra Lee	6/30/2010	\$380	2010 July Monthly
Debra Lee	7/27/2010	\$380	2010 August Monthly
Debra Lee	8/25/2010	\$570	2010 September Monthly
Debra Lee	10/12/2010	\$380	2010 12 Day Pre-General
Debra Lee	10/18/2010	\$760	2010 30 Day Post-General
Debra Lee	12/16/2010	\$380	2010 Year End
<b>Michael Fricklas</b>			
Michael Fricklas	1/6/2010	\$1,140	2010 February Monthly
Michael Fricklas	3/2/2010	\$380	2010 April Monthly
Michael Fricklas	5/21/2010	\$950	2010 June Monthly
Michael Fricklas	6/4/2010	\$760	2010 July Monthly
Michael Fricklas	7/27/2010	\$380	2010 August Monthly
Michael Fricklas	8/25/2010	\$380	2010 September Monthly
Michael Fricklas	9/29/2010	\$380	2010 October Monthly

Michael Fricklas	10/12/2010	\$190	2010 12 Day Pre-General
Michael Fricklas	10/28/2010	\$570	2010 30 Day Post-General
Michael Fricklas	12/3/2010	\$380	2010 Year End
<b> </b>			
Judith McGrath	1/6/2010	\$950	2010 February Monthly
Judith McGrath	2/24/2010	\$380	2010 March Monthly
Judith McGrath	3/30/2010	\$760	2010 April Monthly
Judith McGrath	5/21/2010	\$380	2010 June Monthly
Judith McGrath	6/4/2010	\$950	2010 July Monthly
Judith McGrath	7/27/2010	\$190	2010 August Monthly
Judith McGrath	8/5/2010	\$380	2010 September Monthly
Judith McGrath	9/7/2010	\$570	2010 October Monthly
Judith McGrath	10/18/2010	\$570	2010 30 Day Post-General
Judith McGrath	12/3/2010	\$380	2010 Year End
<b> </b>			
William Roedy	1/6/2010	\$950	2010 February Monthly
William Roedy	2/24/2010	\$380	2010 March Monthly
William Roedy	3/30/2010	\$760	2010 April Monthly
William Roedy	5/21/2010	\$380	2010 June Monthly
William Roedy	6/4/2010	\$950	2010 July Monthly
William Roedy	7/27/2010	\$190	2010 August Monthly
William Roedy	8/5/2010	\$380	2010 September Monthly
William Roedy	9/7/2010	\$570	2010 October Monthly
William Roedy	10/18/2010	\$570	2010 30 Day Post-General
William Roedy	12/3/2010	\$380	2010 Year End
<b> </b>			
Andra Shapiro	1/6/2010	\$950	2010 February Monthly
Andra Shapiro	2/24/2010	\$380	2010 March Monthly
Andra Shapiro	3/30/2010	\$760	2010 April Monthly
Andra Shapiro	5/21/2010	\$380	2010 June Monthly
Andra Shapiro	6/4/2010	\$950	2010 July Monthly
Andra Shapiro	7/27/2010	\$190	2010 August Monthly
Andra Shapiro	8/5/2010	\$380	2010 September Monthly

Andra Shapiro	9/7/2010	\$570	2010 October Monthly
Andra Shapiro	10/18/2010	\$570	2010 30 Day Post- General
Andra Shapiro	12/3/2010	\$380	2010 Year End