



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 14, 2006

Carol Davis, Treasurer  
Sanders for Senate  
P.O. Box 391  
Burlington, VT 05402

**Response Due Date:**  
**April 13, 2006**

Identification Number: C00411330

Reference: Year End Report (10/1/05 – 12/31/05)

Dear Ms. Davis:

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. **An adequate response must be received at the Senate Public Records Office by the response date noted above.** An itemization of the information needed follows:

-Your report contains incorrect Column B figures for Lines 6(a), 6(b), 6(c), 7(a), 7(b), 7(c), 11(a)(iii), 11(e), 12, 14, 16, 17, 20(c), 20(d), 21, 22 of the Summary and Detailed Summary Page information. When aggregating and reporting receipts and disbursements, candidate committees are required to disclose their activity on an election-cycle basis, from 11/3/04 to 11/7/06. Please amend your report to show election cycle-to-date figures for all aggregate amounts. (2 U.S.C. §434(b))

-Your report fails to include an FEC Form 3Z-1. Form 3Z-1 is used to disclose the total gross receipts of the candidate's authorized committees available to be expended as of December 31, 2005 in connection with the 2006 Primary and General elections. Please provide a completed Form 3Z-1 with this report. (2 U.S.C. §434(B) and 11 CFR §104.19(b))

-On Schedule B of your report, you failed to provide the purpose for all itemized expenditures. Federal Election Commission (FEC) regulations require that you disclose the purpose for each expenditure made by your committee to a person/vendor in which the aggregate amount of payments made to that person/vendor exceeds \$200 for the election cycle. Please amend Schedule B of your report to include the missing information. (11 CFR 104.3(b)(4))

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-Commission Regulations define the term "purpose" to mean a brief statement or description of why a disbursement was made. Examples are "dinner expense", "media", "salary", "polling", "travel", "party fees", "phone banks", "travel expenses", "travel expense reimbursement" and "catering costs". Examples of election day and voter registration activity include "exit polling", "door-to-door get out the vote", "get out the vote phone calls" and "driving voters to the polls". Unacceptable descriptions, which require additional clarification, include but are not limited to "advance", "consulting", "commission", "contract labor", "retainer", "election day expense", "expenses", "invoice", "support", "expense reimbursement", "miscellaneous", "professional services", "get-out-the-vote", "voter registration", "contract", "gen. camp. exp". (11 CFR §104.3(b)(4)(A)) Please amend Schedule B of your report to correct the descriptions that do not meet the requirements of the Regulations.

-Schedule B of your report discloses disbursements to credit card companies. When reporting payments to credit card companies, if the payment to the original vendor aggregates in excess of \$200 in an election cycle, you must itemize, as a memo entry, the name and address of the original vendor, together with the date, amount and purpose of the expenditure. If itemization is not necessary, you must indicate so in an amendment to this report. Please correct your report to include the missing information. (11 CFR §104.9)

-Schedule B of your report discloses reimbursements to individuals for expenses other than travel and subsistence. 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 an election cycle, 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. If itemization is not necessary, you must indicate so in an amendment to this report. Please correct your report to include the missing information. (11 CFR §§ 104.3(b)(4)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20)

-Schedule B of your report discloses reimbursements to staff for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by staff to any one vendor that make up the reimbursement may have to be itemized. For example, if the campaign related payments to any one vendor by the campaign/staff aggregate in excess of \$200 for the election cycle, the staff

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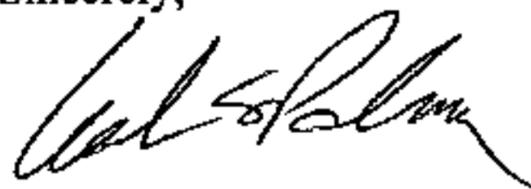
advance payment to the vendor must also be itemized in a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and detailed purpose of the advance. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must indicate so in an amendment to this report. Please amend your report to include the missing or clarifying information. See AO 1996-20 for additional clarification. (11 CFR §104.9)

-Schedule A of your report contains entries for contributions made by more than one person. For contributions made by more than one individual in a single written instrument, you must report the amount attributed to each contributor along with all the required contributor information (full name, address, occupation and employer) in a separate entry for each person. See 11 CFR §§100.12, 104.8(a), (b) and (d)(1) and the Campaign Guide for Congressional Candidates for additional clarification.

**Please note you will not receive an additional notice from the Commission on this matter.** Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. 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.

A written response or an amendment to your original report(s) correcting the above problems should be filed with the Senate Public Records Office. Please contact the Senate Public Records Office at (202) 224-0322 for instructions on how and where to file an amendment. 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) 694-1154.

Sincerely,



Leah S. Palmer  
Senior Campaign Finance Analyst  
Reports Analysis Division

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