



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

April 16, 2013

RYAN HECKER, TREASURER  
FREEDOMWORKS FOR AMERICA  
400 N CAPITOL STREET NW SUITE 765  
WASHINGTON, DC 20001

**Response Due Date****05/21/2013**

IDENTIFICATION NUMBER: C00499020

REFERENCE: AMENDED 30 DAY POST-GENERAL REPORT (10/18/2012 -  
11/26/2012), RECEIVED 01/31/2013

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 A supporting Line 11(a)(i) of your report discloses negative entries for the apparent refund(s) of contributions originally received by your committee. Please be advised that if your committee wrote a refund check from your account, this disbursement should be disclosed on Schedule B supporting Line 28 of the Detailed Summary Page. Further, negative entries on Schedule A should only be used to disclose voided checks that were not cashed or cleared by a bank. This method of reporting would clarify for the public record the total amount of receipts/disbursements and more accurately disclose the cash-on-hand amount. Please amend your report(s) to properly disclose this activity or provide clarifying information.
2. Schedule E of your report indicates that your committee may have failed to file and timely 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

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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))

**3.** Your committee has filed a 24 hour report for an independent expenditure supporting Connie Mack (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)

**4.** The independent expenditure schedule (Schedule E) should disclose the following information: the name and mailing address of the payee, the purpose of the expenditure, the date of payment, the amount of payment, the name and office sought, state and district (if applicable) of the federal candidate, the calendar year-to-date, per election, for office sought total, the election designation, an indication of whether the candidate was supported or opposed and the signature of the treasurer. Please amend Schedule E by providing the address. (11 CFR §104.3(b)(3)(vii))

**5.** Schedule E discloses Independent Expenditures supporting Michael Coffman, Colorado's Sixth District, and Garland "Andy" Barr, Kentucky's Six District, for the 2012 General election. However, you disclosed office information for Colorado's Senate for Michael Coffman and office sought for Kentucky's Senate for Garland "Andy" Barr. Please amend the Schedule E of the Report to provide the correct state information for the candidate supported. (11 CFR §104.3(b) (3)(viii))

- Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. For your information and consideration when preparing future filings, contributions from other political committees should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (2 U.S.C § 434(b) and FORM 3X Instructions)

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**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) 694-1169.

Sincerely,



Kevin Fortkiewicz  
Campaign Finance Analyst  
Reports Analysis Division

**Late 24 Hour Report (Schedule E)****Freedomworks for America (C00499020)**

<b>Name of Payee</b>	<b>Date</b>	<b>Amount</b>	<b>Candidate</b>	<b>Election</b>	<b>Report Received</b>
Imagine This Company	10/27/12	\$3,300.00	Danny Tarkanian	G2012	11/2/12
Imagine This Company	10/27/12	\$6,375.00	Barack Obama	G2012	11/2/12
Imagine This Company	10/27/12	\$1,250.00	Jeff Flake	G2012	11/2/12
Connection Strategy	10/24/12	\$657.01	Connie Mack	G2012	11/3/12
Connection Strategy	10/31/12	\$782.78	Connie Mack	G2012	11/6/12
Freedomworks	11/4/12	\$1,036.36	Connie Mack	G2012	11/6/12
Imagine This Company	10/27/12	\$5,100.00	Shelley Berkley	G2012	11/2/12
Connection Strategy	10/31/12	\$608.18	Josh Mandel	G2012	11/6/12
Giovanni's Pizza	10/18/12	\$68.93	Tom Smith	G2012	10/25/12
WaWa	10/18/12	\$13.74	Tom Smith	G2012	10/25/12
Freedomworks	10/24/12	\$28.00	Tom Smith	G2012	10/25/12
Arena Communications	10/29/12	\$24,824.00	Adam Hasner	G2012	10/31/12

**Missing 24 Hour Report (Schedule E)****Freedomworks for America (C00499020)**

<b>Name of Payee</b>	<b>Date</b>	<b>Amount</b>	<b>Candidate</b>	<b>Election</b>
Adcoprint.com	10/20/12	\$21,817.30	Barack Obama	G2012
Freedomworks	10/31/12	\$119.51	Barack Obama	G2012
Connection Strategy	10/31/12	\$40.95	J Robert Kerrey	G2012
AOL	10/22/12	\$7,545.45	Joseph S Donnelly	G2012
AOL	10/22/12	\$7,545.45	Richard E Mourdock	G2012
Connection Strategy	10/31/12	\$37.54	Ann Marie Buerkle	G2012
Freedomworks	10/31/12	\$10.06	Ann Marie Buerkle	G2012
AOL	10/22/12	\$4,133.73	Bill Nelson	G2012
AOL	10/22/12	\$4,133.73	Connie Mack	G2012
Connection Strategy	10/31/12	\$36.76	Debbie Stabenow	G2012
Freedomworks	10/31/12	\$31.07	Debbie Stabenow	G2012
Freedomworks	10/31/12	\$88.19	Debra S Fischer	G2012
Political Gravity	11/1/12	\$900.00	Debra S Fischer	G2012
Connection Strategy	10/31/12	\$110.33	George Allen	G2012
Connection Strategy	10/31/12	\$37.67	Jason Plummer	G2012
Connection Strategy	10/31/12	\$37.67	Jason Plummer	G2012
Connection Strategy	10/31/12	\$116.10	Jeff Flake	G2012
Freedomworks	10/18/12	\$3,000.00	Jeffrey M Landry	G2012
Freedomworks	10/22/12	\$235.16	Jeffrey M Landry	G2012
Lowry's Printing	10/29/12	\$1,088.11	Jeffrey M Landry	G2012
Freedomworks	10/31/12	\$150.42	Jeffrey M Landry	G2012
Freedomworks	10/18/12	\$3,000.00	Joe Walsh	G2012
Harris Media	10/28/12	\$18,415.52	Joe Walsh	G2012
Connection Strategy	10/31/12	\$54.59	Joe Walsh	G2012
Freedomworks	10/18/12	\$676.98	Danny Tarkanian	G2012

**Missing 24 Hour Report (Schedule E)****Freedomworks for America (C00499020)**

<b>Name of Payee</b>	<b>Date</b>	<b>Amount</b>	<b>Candidate</b>	<b>Election</b>
AOL	10/22/12	\$7,176.67	Josh Mandel	G2012
Freedomworks	10/23/12	\$971.90	Josh Mandel	G2012
Harris Media	10/28/12	\$30,510.77	L. Tammy Duckworth	G2012
Harris Media	10/28/12	\$450.72	Lois J Frankel	G2012
Mungo LLC	10/26/12	\$578.50	Michael Coffman	G2012
AOL	10/29/12	\$14,500.00	Robert P Casey, Jr	G2012
Freedomworks	10/31/12	\$61.35	Shelley Berkley	G2012
AOL	10/22/12	\$7,176.67	Sherrod Brown	G2012
Freedomworks	10/31/12	\$91.36	Timothy Michael Kaine	G2012
AOL	10/22/12	\$14,500.00	Tom Smith	G2012
Connection Strategy	10/31/12	\$39.77	Tom Smith	G2012
Freedomworks	10/31/12	\$13.83	Tom Smith	G2012

**Missing Schedule E (24 Hour Report)**

**Freedomworks for America (C00499020)**

<b>Name of Payee</b>	<b>Date</b>	<b>Amount</b>	<b>Candidate</b>	<b>Election</b>
Adcoprint.com	10/20/12	\$21,817.30	Connie Mack	G2012

**Missing Information - 24 Hour Report  
Freedomworks for America (C00499020)**

<b>Name of Payee</b>	<b>Date</b>	<b>Amount</b>	<b>Candidate</b>
Big Daddy's Signs	11/16/12	\$4,704.13	Jeffrey M Landry
Patrick Hedger	10/27/12	\$45.76	Connie Mack
Lukoil	11/3/12	\$83.01	Tom Smith
Anastasia Przybylski	11/3/12	\$153.12	Tom Smith
Sunoco	11/6/12	\$74.01	Tom Smith
The Standard Club	11/6/12	\$3,891.74	Tom Smith