



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 12, 2014

CHARLOTTE BENJAMIN, TREASURER
CLINT DIDIER FOR CONGRESS
PO BOX 157
ELTOPIA, WA 99301

Response Due Date
12/17/2014

IDENTIFICATION NUMBER: C00558502

REFERENCE: AMENDED OCTOBER QUARTERLY REPORT (07/17/2014 - 09/30/2014),
RECEIVED 10/21/2014

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 3 item(s):

1. Schedule A of your report discloses one or more contributions that appear to be from a corporation(s) and/or labor organization(s) (see attached). 52 U.S.C. § 30118(a) (formerly 2 U.S.C. § 441b(a)) and 11 CFR § 103.3(b) prohibit the receipt of contributions from corporations and labor organizations unless made from separate segregated funds established by the corporations and labor organizations.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you must amend your original report with clarifying information.

If you have received prohibited contributions, you must make a refund within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(1) and (2))

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide a photocopy of any refund checks. Refunds must be reported on a Schedule B supporting Line 20(a) of the report covering the period in which the refund is made. (11 CFR § 104.8(d)(4))

Although the Commission may take further legal action concerning the

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acceptance of prohibited contributions, your prompt action to refund the prohibited amount will be taken into consideration.

2. Schedule A of your report discloses one or more contributions that appear to be from limited liability corporation(s) (LLC) (see attached). The Commission notes your additional explanation regarding the committee's corrective action taken for all of these contributions. 11 C.F.R. §110.1(g) allows the receipt of contributions from LLCs providing the LLC is treated as a partnership for tax purposes, and has not elected to be treated as a corporation by the Internal Revenue Service (IRS). Both LLCs that claim corporate status and those that publicly traded would be treated as corporations for FECA purposes.

Please amend your report to clarify if the LLCs in question are treated as partnerships. If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you must amend your original report with clarifying information.

If you have received prohibited contributions, you must make a refund. (11 CFR § 103.3(b)(1)) The refund must be made within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(2))

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide a photocopy of any refund checks. Refunds must be reported on a Schedule B supporting Line 20(a) of the report covering the period in which the refund was made. (11 CFR § 104.8(d)(4))

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, your prompt action to refund the prohibited amount will be taken into consideration.

3. Schedule B of your report discloses reimbursements to individuals for the following disbursement: "Reimb For Radio Ads & Prof'L Svces." 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. Please amend your report to include the missing information on Schedule B and clearly identify each memo entry supporting a reimbursement. If itemization is not necessary, you must indicate so in an amendment to this report. (11 CFR §§ 104.3(b)(4)(i) and 104.9, and Advisory Opinions 1992-1

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and 1996-20, footnote 3)

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) 694-1167.

Sincerely,



Tyler Culberson
Senior Campaign Finance Analyst
Reports Analysis Division

**Excessive, Prohibited, and Impermissible Contributions
Clint Didier For Congress (C00558502)**

Contributions from Possible Prohibited Entities

Contributor Name	Date	Amount	Election
Cloud 9 Farms, LLC	8/18/2014	\$1,500.00	G2014
Eltopia Irrigation, LLC	7/22/2014	\$350.00	P2014
Help-U-Move	9/17/2014	\$800.00	G2014
Irwin Research & Development, Inc	8/20/2014	\$500.00	G2014
Middleton Orchrds, Inc	8/18/2014	\$750.00	G2014
No 9 Hay Trading Co	9/15/2014	\$1,000.00	G2014
Paul A Bouchey Ranch, Inc	9/18/2014	\$750.00	G2014
Phipps Farms LLLC	9/1/2014	\$250.00	G2014
Ron Asmus Homes Inc	9/30/2014	\$2,500.00	G2014
Salt Institute	8/18/2014	\$500.00	P2014
SMI Group XII, LLC	9/15/2014	\$2,500.00	G2014
SMI Group XV, LLLC	9/15/2014	\$2,500.00	G2014
Stahl Hutterian Brethren	8/15/2014	\$500.00	G2014
Worsham Farms LLC	9/16/2014	\$1,500.00	G2014