

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

July 12, 2012

ANDREW BARNETT, TREASURER STRENGTH & LIBERTY PAC 10251 SUNRISE LANE SANTA ANA, CA 92705

IDENTIFICATION NUMBER: C00513366

Response Due Date 08/16/2012

REFERENCE: APRIL QUARTERLY REPORT (01/01/2012 - 03/31/2012)

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 $\underline{4}$ item(s):

1. Schedule E of your report indicates that your committee may have failed to 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 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))

2. 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 state. (11 CFR 104.3(b)(3)(vii))

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3. Itemized independent expenditures must include a brief statement or description of why the expenditures were made. Please amend Schedule E of your report to clarify the following description(s): "Fundraising Services" and "Legal." For further guidance regarding acceptable purposes, please refer to 11 CFR §104.3(b)(3).

Note, if these represent committee administrative and fundraising expenses, please be advised that the amount of such activity should be subtracted from Line 24 and itemized on Schedule B supporting Line 21(b). This method of reporting would clarify for the public record the total amount of committee administrative and fundraising expenses by reflecting them on Line 21(b) of the Detailed Summary Page.

4. Itemized independent expenditures must include a brief statement or description of why the expenditures were made. Please amend Schedule E of your report to clarify the following description(s): "Messaging dissemination-to oppose Romney." For further guidance regarding acceptable purposes, please refer to 11 CFR §104.3(b)(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) 694-1133.

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Sincerely,

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Christopher Morse Senior Campaign Finance Analyst Reports Analysis Division

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Late 24 Hour Report (Schedule E) Strength Liberty PAC (C00513366)

Name of Payee	Date	Amount	Purpose	Candidate	Report Received
Telennium Ventures	3/8/12	\$20,000.00	Messaging	Romney	3/12/12
Inc.			dissemination-to		
			oppose Romney		
Telennium Ventures	3/8/12	\$15,000.00	Messaging	Romney	3/12/12
Inc.			dissemination-to		
			oppose Romney		