



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

January 16, 2013

WES BOYD, TREASURER
MOVEON.ORG POLITICAL ACTION
P.O. BOX 9218
BERKELEY, CA 94709

Response Due Date**02/20/2013**

IDENTIFICATION NUMBER: C00341396

REFERENCE: AMENDED JULY QUARTERLY REPORT (04/01/2012 - 06/30/2012),
RECEIVED 10/06/2012

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 6 item(s):

1. Schedule A supporting Line 11(a)(i) discloses a voided check(s) for "Credit Card Chargeback" (see attached), however, it appears that the original contribution(s) has not been reported by your committee. Please amend the report covering the period(s) during which the contribution(s) was disbursed and disclose the original date of the contribution.
2. Schedule B of your report discloses disbursements with the purpose "Per Diem" that appear to be made from petty cash. Please be advised that disbursements from a petty cash fund to any person or vendor for any single purchase or transaction may not exceed \$100. If payments to the original vendor exceed \$200 in a calendar year, a memo entry including the name of the original vendor as well as address, date, amount, and purpose of the original purchase must be provided. Please amend your report to include the missing information or provide clarifying information if memo items are not required. (2 U.S.C. § 432(h)(2) and 11 CFR § 102.11)
3. Schedule B supporting Line 21(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 a calendar year, 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

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amend your report to include the missing information or provide clarifying information if memo items are not required. (11 CFR §§ 104.3(b)(3)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20)

4. Your report discloses the apparent disbursement of earmarked contributions outside the permissible time period. As a conduit or intermediary for an authorized committee, your committee must forward any earmarked contribution, along with a transmittal report, no later than ten (10) days after receiving the earmarked contribution. (11 CFR §§102.8(a) and (c) and 110.6(c)(1)(iii))

If the earmarked contributions were incompletely or incorrectly disclosed, you should amend your report with clarifying information.

Although the Commission may take further legal action regarding the untimely forwarding of earmarked contributions, your prompt action in addressing the concerns raised will be taken into consideration.

5. Schedule B 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(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

The Commission notes, "Forward Earmarked Contributions," however there does not appear to be any earmarks that correspond with these transactions.

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

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount. (11 CFR §103.3(b)(1) and (3))

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on

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Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

6. Schedule E supporting Line 24 of your report discloses an independent expenditure(s) opposing "MITT ROMNEY" which appears to have been publicly disseminated or distributed after the primary date(s) in the respective state(s). Please be advised that if a communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated or distributed, and on a Schedule D if it is a reportable debt under 11 CFR §104.11. When the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable.

Please amend your report to provide further clarifying information regarding the independent expenditures disclosed after the primary date(s).

- Schedule B of your report discloses an expenditure(s) for "Advertising," "Media Consulting," "Media Productdion," "Media Production," and "Printing." For your information and consideration when preparing future filings, if a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) containing express advocacy as defined under 11 CFR §100.22, this would constitute an independent expenditure and would be disclosed on a Schedule E supporting Line 24. Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate would be reported on Schedule B for Line 21(b) of the Detailed Summary Page.

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.**

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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) 694-1164.

Sincerely,

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

Nicole Miller
Senior Campaign Finance Analyst
Reports Analysis Division

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Voided Contributions
MOVEON.ORG POLITICAL ACTION (C00341396)

Name	Date	Amount	Purpose
Wheeler, Lynn	4/29/12	-\$200.00	Credit Card Chargeback
Ellis, Bob	5/25/12	-\$25.00	Credit Card Chargeback
Swain, Mary	6/23/12	-\$25.00	Credit Card Chargeback
Swain, Mary	6/23/12	-\$25.00	Credit Card Chargeback
Swain, Mary	6/23/12	-\$25.00	Credit Card Chargeback
Santry, Mary	4/29/12	-\$20.00	Credit Card Chargeback
Santry, Mary	4/29/12	-\$20.00	Credit Card Chargeback
Santry, Mary	4/29/12	-\$20.00	Credit Card Chargeback
Santry, Mary	4/29/12	-\$20.00	Credit Card Chargeback
Santry, Mary	4/29/12	-\$20.00	Credit Card Chargeback
Santry, Mary	4/29/12	-\$20.00	Credit Card Chargeback
Santry, Mary	4/29/12	-\$20.00	Credit Card Chargeback
Santry, Mary	4/29/12	-\$20.00	Credit Card Chargeback
Swain, Mary	6/23/12	-\$20.00	Credit Card Chargeback
Swain, Mary	6/23/12	-\$20.00	Credit Card Chargeback
Swain, Mary	6/23/12	-\$20.00	Credit Card Chargeback
Swain, Mary	6/23/12	-\$20.00	Credit Card Chargeback
Swain, Mary	6/23/12	-\$20.00	Credit Card Chargeback
Erickson, Robert S	6/3/12	-\$15.00	Credit Card Chargeback
Erickson, Robert S	6/3/12	-\$15.00	Credit Card Chargeback
Erickson, Robert S	6/3/12	-\$15.00	Credit Card Chargeback
Erickson, Robert S	6/3/12	-\$15.00	Credit Card Chargeback
Erickson, Robert S	6/3/12	-\$15.00	Credit Card Chargeback
Erickson, Robert S	6/3/12	-\$15.00	Credit Card Chargeback
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Erickson, Robert S	6/3/12	-\$15.00	Credit Card Chargeback
Erickson, Robert S	6/3/12	-\$15.00	Credit Card Chargeback
Erickson, Robert S	6/3/12	-\$15.00	Credit Card Chargeback
Erickson, Robert S	6/3/12	-\$15.00	Credit Card Chargeback
Ost, Linda	4/29/12	-\$15.00	Credit Card Chargeback
Twight, Ben W	5/25/12	-\$15.00	Credit Card Chargeback
Twight, Ben W	5/25/12	-\$15.00	Credit Card Chargeback

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Twight, Ben W	5/25/12	-\$15.00	Credit Card Chargeback
Twight, Ben W	5/25/12	-\$15.00	Credit Card Chargeback
Twight, Ben W	5/25/12	-\$15.00	Credit Card Chargeback
Twight, Ben W	5/25/12	-\$15.00	Credit Card Chargeback
Nelson, Joan	6/23/12	-\$10.00	Credit Card Chargeback
Nelson, Joan	6/23/12	-\$10.00	Credit Card Chargeback
Nelson, Joan	6/23/12	-\$10.00	Credit Card Chargeback
Nordholm, Marianne	4/29/12	-\$10.00	Credit Card Chargeback
Nordholm, Marianne	4/29/12	-\$10.00	Credit Card Chargeback
Nordholm, Marianne	4/29/12	-\$10.00	Credit Card Chargeback
Welling, Joann	5/25/12	-\$8.00	Credit Card Chargeback
Welling, Joann	5/25/12	-\$8.00	Credit Card Chargeback
Welling, Joann	5/25/12	-\$8.00	Credit Card Chargeback

**Excessive, Prohibited, and Impermissible Contributions
MOVEON.ORG POLITICAL ACTION (C00341396)****Excessive Contributions to a Candidate Committee**

Recipient Name	Date	Amount	Election	Report
GRIEGO FOR CONGRESS	3/26/2012	\$5,000.00	P2012	2012 April Quarterly
GRIEGO FOR CONGRESS	4/6/2012	\$1,195.00	P2012	2012 July Quarterly
GRIEGO FOR CONGRESS	4/14/2012	\$870.00	P2012	2012 July Quarterly
GRIEGO FOR CONGRESS	4/29/2012	\$809.00	P2012	2012 July Quarterly
GRIEGO FOR CONGRESS	5/18/2012	\$2,487.00	P2012	2012 July Quarterly
GRIEGO FOR CONGRESS	5/31/2012	\$546.50	P2012	2012 July Quarterly
GRIEGO FOR CONGRESS	5/31/2012	\$5,616.02	P2012	2012 July Quarterly
GRIEGO FOR CONGRESS	6/4/2012	\$1,992.00	P2012	2012 July Quarterly