



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

October 10, 2018

NATHANAEL PENDLEY, TREASURER  
CLUB FOR CONSERVATIVES  
435 MERCHANT WALK SQUARE SUITE300 #516  
CHARLOTTESVILLE, VA 22902

**Response Due Date**  
**11/14/2018**

IDENTIFICATION NUMBER: C00658302

REFERENCE: JULY QUARTERLY REPORT (04/01/2018 - 06/30/2018)

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 enforcement action.** Additional information is needed for the following 2 item(s):

1. Schedule B supporting Line 23 discloses one or more contributions to a candidate(s) for the 2018 Primary election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. (11 CFR §§110.1(b)(3) and 110.2(b)(3))

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund 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. (11 CFR §103.3(b)(1) and (3))

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund or redesignation request sent to the recipient

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committee(s). In addition, any refunds should be disclosed on 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 this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

2. Your committee filed 48-hour reports informing the Commission of independent expenditures made in support or opposition of federal candidates with "DANIEL CRENSHAW" as the payee(s). However, the amounts and dates of public dissemination disclosed on these reports do not appear to correlate with the entries on Schedule E, supporting Line 24 for the reporting period. If your committee has filed 48-hour reports supporting independent expenditures not reflected on your reports, you must file Schedule E during the appropriate reporting period to disclose these payments. Please amend your report to clarify this discrepancy and provide further information concerning these reports. (11 CFR §104.4)

**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. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. 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) 694-1143.

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Sincerely,

A handwritten signature in black ink that reads "Kaitlin E. Seufert". The signature is written in a cursive style with a large initial 'K'.

Kaitlin Seufert  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division

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**Impermissible, Excessive, and Prohibited Contributions**  
**CLUB FOR CONSERVATIVES (C00658302)**

**Contributions Made After Election Date**

<b>Recipient Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>	<b>Election (State-Date)</b>
CRAMER FOR SENATE	6/30/18	\$2,000.00	P2018	ND-6/12/18
ROSENDALE, MATT	6/30/18	\$2,000.00	P2018	MT-6/5/18
TARKANIAN, DANNY	6/30/18	\$2,700.00	P2018	NV-6/12/18
TAYLOR, NICHOLAS V.	6/30/18	\$1,250.00	P2018	TX-3/6/18
TENNEY, CLAUDIA	6/30/18	\$2,700.00	P2018	NY-6/26/18