



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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November 13, 2018

LORI COLVIN, TREASURER
SOUTHWEST GAS CORPORATION POLITICAL
ACTION COMMITTEE
5241 SPRING MOUNTAIN ROAD
LAS VEGAS, NV 89150

Response Due Date
12/18/2018

IDENTIFICATION NUMBER: C00076737

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2018 - 09/30/2018)

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

SOUTHWEST GAS CORPORATION POLITICAL ACTION COMMITTEE

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provide a photocopy of the refund or redesignation request sent to the recipient 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. Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. Please be advised that 52 U.S.C. §30116(a) (formerly 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.

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.

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 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 the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration. (11 CFR §103.3(b)(1) and (3))

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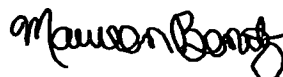
SOUTHWEST GAS CORPORATION POLITICAL ACTION COMMITTEE

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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. 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) 694-1147.

Sincerely,



Maureen Benitz
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

Impermissible, Excessive, and Prohibited Contributions
SOUTHWEST GAS CORPORATION POLITICAL ACTION COMMITTEE
(C00076737)

Contributions Made After Election Date

Recipient Name	Date	Amount	Election	Election (State-Date)
SUSIE LEE FOR CONGRESS	7/30/18	\$2,500.00	P2018	NV - 6/12/18

Excessive Contributions to a Committee/Candidate Committee

Recipient Name	Date	Amount	Election	Report
SINEMA FOR ARIZONA	8/1/18	\$5,500.00	G2018	2018 October Quarterly

2018 OCT 10 10:00 AM



P.O. Box 98510, Las Vegas, NV 89193-8510 • 702-878-7163 • FAX: 702-873-3820

December 14, 2018

Sinema for Arizona
P.O. Box 7586
Phoenix, AZ 85011-7586

The Southwest Gas Political Action Committee provided a donation to you on August 1, 2018, in the amount of \$5500 TO Sinema for Arizona. We have re-designated the contribution of \$500 toward primary and \$5,000 towards the general election. We recently received a communication from the Federal Election Commission indicating that this designation was in error and we need to re-designate the contribution correctly. The changes have been amended to the October Quarterly Report to the Federal Election Commission and designate the contribution appropriately for the 2018 General Election.

Thank you for your understanding this matter. We apologize for any confusion this may have caused.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Leedom".

Scott Leedom
Director, Public Affairs



P.O. Box 98510, Las Vegas, NV 89193-8510 • 702-878-7163 • FAX: 702-873-3820

**Southwest Gas
Political
Action
Committee**

December 14, 2018

Susie Lee for Congress
5130 S Fort Apache Rd
Ste 215-382
Las Vegas, NV 89148

The Southwest Gas Political Action Committee provided a donation to you on July 30, 2018, in the amount of \$2500 that we designated for the 2018 Primary Election cycle. We recently received a communication from the Federal Election Commission indicating that this designation was in error and we need to re-designate the contribution to the 2018 General Election since the contribution was made after the 2018 Primary Election. The changes have been made to an amended October Quarterly Report to the Federal Election Commission and designated the contribution appropriately as Susie Lee for Congress for the 2018 General Election.

Thank you for your understanding this matter. We apologize for any confusion this may have caused.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Leedom".

Scott Leedom
Director, Public Affairs



SOUTHWEST GAS CORPORATION

Lori L. Colvin, VP/Controller/Chief Accounting Officer

December 17, 2018

Ms. Maureen Benitz
Senior Campaign Finance Analyst
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Ms. Benitz:

Re: Southwest Gas Corporation Political Action Committee #C00076737
October Quarterly Report (07/01/2018 - 09/30/2018)

I received an e-mail dated November 14, 2018 from the Federal Election Commission that the October quarterly report included a contribution that was made after the election date for Susie Lee for Congress (originally designated to the 2018 primary election) as well as an excessive contribution to Sinema for Congress.

This letter serves as confirmation that we have re-designated the contribution for Susie Lee for Congress to the 2018 general election.

The excessive contribution of \$5,500 to Sinema for Arizona, has been re-designated as \$500 towards the 2018 primary and \$5,000 towards the 2018 general election.

Attached are copies of the letters that have been sent to the treasurers of their respective committees stating that we have done so. The entries were corrected, and our October quarterly report was amended to reflect that change on December 4, 2018.

Please let me know if you have any questions or need any additional information.

Sincerely

Lori Colvin
Treasurer, SWG PAC

Attachments

c Selva Montoya, Assistant Treasurer

PAC
Southwest Gas
Political
Action
Committee

P.O. Box 98510, Las Vegas, NV 89193-8510

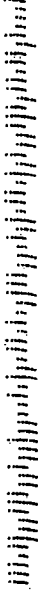
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Federal Election Commission
Attn: Maureen Benitz
1050 First Street, NE
Washington, DC 20463



Federal Election Commission
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 The FEC added this page to the end of this filing to indicate how it was received.

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(3/2015)

MP

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