



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

January 4, 2015

STEVE RALLS, TREASURER
COMSTOCK FOR CONGRESS
PO BOX 831
MC LEAN, VA 22101

Response Due Date

02/09/2015

IDENTIFICATION NUMBER: C00554261

REFERENCE: AMENDED 30 DAY POST-GENERAL REPORT (10/16/2014 -
11/24/2014), RECEIVED 12/10/2014

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 2 item(s):

1. Schedule A supporting Line 12 of the Detailed Summary Page(s) of your combined 2014 reports disclose transfers totaling \$186,158.72 from "Winning Women" and \$48,752.90 from "Victory Trust 2014," which are joint fundraising committees affiliated with your committee. The sum of memo Schedule A is less than the total amount transferred for both entities. Please note that the sum of memo Schedule A supporting a transfer(s) from a joint fundraising committee should be greater than or equal to the amount of the transfer(s).

Each participating committee shall report its share for **net** proceeds received from the joint fundraising committee as a transfer-in on Schedule A. A memo Schedule A must be provided to itemize your committee's share of the **gross** contributions received through the joint fundraiser. The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the election cycle and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount. (11 CFR § 102.17(c)(8)(i)(B)) Please amend your report to include the missing Schedule A or provide an explanation for this apparent discrepancy.

2. Schedule A of your report indicates that your committee may have failed to

COMSTOCK FOR CONGRESS

Page 2 of 3

file one or more of the required 48-hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-General Report (see attached). A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. The failure to file 48-hour notices may result in civil money penalties or legal enforcement action. (11 CFR § 104.5(f))

If any contribution of \$1,000 or more was incorrectly reported, you must amend your original report with the clarifying information. For each contribution received by a joint fundraising representative and subsequently transferred to your committee, please ensure that your report discloses the original date of receipt of the contribution by the joint fundraising representative in a memo entry supporting the transfer. The entry for the transfer itself should show the date the contribution was transferred to your committee by the joint fundraising representative.

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) 694-1138.

COMSTOCK FOR CONGRESS

Page 3 of 3

Sincerely,

A handwritten signature in black ink that reads "Carolina Mongeon". The signature is written in a cursive style with a large, prominent 'C' and 'M'.

Carolina Mongeon
Senior Campaign Finance Analyst
Reports Analysis Division

427

Missing 48-Hour Notices
Comstock for Congress (C00554261)

Contributor Name	Date	Amount	Election
America's First PAC	10/16/14	\$1,000.00	G2014
Kaneb, John M Mr	10/24/14	\$5,200.00	G2014