



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

December 7, 2014

ERIC CAMPBELL, TREASURER
SULLIVAN FOR US SENATE
3705 ARCTIC BLVD #447
ANCHORAGE, AK 99503-5774

Response Due Date
01/12/2015

IDENTIFICATION NUMBER: C00551093

REFERENCE: 12 DAY PRE-PRIMARY REPORT (07/01/2014 - 07/30/2014)

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. **An adequate response must be received at the Senate Public Records Office by the response date noted above. 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 4 item(s):

1. The totals listed on Lines 6(a), 6(b), 6(c), 7(a), 7(c), 11(a)(iii), 11(e), 12, 15, 16, 17, 20(a), 20(d), and 22, Column B of the Summary and Detailed Summary Pages appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the election cycle-to-date totals (11/5/08 through 11/4/14). (52 U.S.C. § 30104(b) (formerly 2 U.S.C. § 434(b)) and 11 CFR § 104.3)
2. The beginning cash balance of this report does not equal the ending balance of your Amended July Quarterly Report, received 11/3/14. Please correct this discrepancy and amend all subsequent reports that may be affected by the correction. (52 U.S.C. § 30104(b)(1) (formerly 2 U.S.C. § 434(b)(1)) and 11 CFR § 104.3(a)(1))
3. Schedule A of your report discloses contributions on line 11(a)(i) that appear to be the result of joint fundraising efforts by the "Victory Trust 2014" committee. Please be advised that when a committee receives a transfer from a joint fundraising representative, the committee must report its share of net

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proceeds received from the representative as a transfer-in on Schedule A supporting Line 12. A memo schedule A must be provided to itemize the 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 all political committees, regardless of the amount of the contribution. (11 CFR § 102.17(c)(8)(i)(B)) Memo entries are used to provide supplemental information on a reporting schedule. **The dollar value of a memo entry should not be included in the total amount for each schedule.** Please amend your report to correct this discrepancy if the entries on line 11(a)(i) are associated with the joint fundraiser transfer. (11 CFR § 104.3(a)(3))

4. Schedule A of your report discloses earmarked contributions through a conduit. Please be reminded that when a committee receives an earmarked contribution(s) through an allowable conduit, each individual contribution must be itemized when the individual's total contributions to your committee aggregate over \$200 per election cycle. This itemization must include the full name, address, occupation, and employer of the individual contributor along with the date the contribution(s) was received by the conduit. Any un-itemized contributions received through the conduit must be included in your totals on Line 11(a)(ii) of the Detailed Summary Page.

In addition, information regarding the conduit or intermediary for each contribution must be itemized on Schedule A as a memo entry. The conduit's full name and address (and occupation and employer if the conduit is an individual) must also be provided, along with the date the contribution(s) was received by your committee and the total amount of earmarked contributions received from the conduit.

Please amend your report to disclose the proper format for earmarked contributions received from a conduit or intermediary. You can refer to the FEC Campaign Guide for Congressional Candidates and Committees for further guidance on how to report earmarked contributions through a conduit (11 CFR § 110.6(c)(2))

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

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taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

A written response or an amendment to your original report(s) correcting the above problems should be filed with the Senate Public Records Office. Please contact the Senate Public Records Office at (202) 224-0322 for instructions on how and where to file an amendment. 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.

Sincerely,

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

Carolina Mongeon
Senior Campaign Finance Analyst
Reports Analysis Division