



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

February 21, 2013

DAVID L. GOULD, TREASURER
PASADENA AREA UNITED DEMOCRATIC
HEADQUARTERS
3700 WILSHIRE BLVD SUITE 1050B
LOS ANGELES, CA 90010

Response Due Date
03/28/2013

IDENTIFICATION NUMBER: C00380568

REFERENCE: 12 DAY PRE-GENERAL REPORT (10/01/2012 - 10/17/2012)

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 5 item(s):

1. Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$19,642.37 in Contributions from Individuals/Persons Other Than Political Committees. The sum of the entries itemized on Schedule A, however, indicates the total to be \$4,171.05. Please amend your report to clarify the discrepancy. (2 U.S.C. § 434(b) and 11 CFR §104.3))
2. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following: "Merchandise," "Postage & Sales Receipts," "Sales Receipts," "Consulting Fees," "Stamps, Food & Supplies," "Consulting," "Supplies," "Merchandise, Food & Supplies," "Consulting Services 2012," "Supplies, Postage" and "Office Supplies." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf.

3. Schedule B supporting Line 21(b) of your report discloses reimbursements to individuals for expenses other than travel and subsistence. Please be advised

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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 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. Schedule C of your report fails to include information required by Commission regulations. With every report submitted, you must provide the date incurred, the original source and amount of the loan, the due date, the interest rate, the cumulative payment, and the outstanding balance. In addition, if there are any endorsers or guarantors, their mailing address, along with the name of their employer and occupation, must be disclosed. Please amend your report to include the due date. (11 CFR §§ 100.52(a), 100.52(b) and 104.3(d))

5. Schedule D of your report itemizes debt owed to "Max Hobbs Political Memorabilia" with an outstanding beginning balance(s) not included on your previous report. Please file an amendment to your report(s) to correct this discrepancy. (11 CFR § 104.11(b))

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) 694-1172.

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Sincerely,

A handwritten signature in black ink, appearing to read 'AB', with a stylized flourish at the end.

Alexandra Broomhead
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

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