



Real Programs. Real Service. Real Value.

*Van G. Miller & Associates*

RECEIVED  
FEC MAIL  
OPERATIONS CENTER

2006 JUL 27 A 7:30

July 18, 2006

FEC  
999 E St. NW  
Washington, DC 20463

To Whom It May Concern:

It came to our attention during the validation process of our 2Q 2006 FEC Form 3X filing on 7/17/06 that our organization had exceeded some receipt/expenditure limits. Please see attached for a copy of page 2 of our Form 3X filing validation. We immediately called the FEC and spoke with Business Analysis rep Jennifer in regards to correcting our errors. Attached you will find a copy of Miscellaneous Electronic Submission (Form 99) detailing Jennifer's recommendations as well as actions VGMPAC has taken to correct our mistakes. We have also included a copy of the letter and supporting documentation sent to Whalen for Congress requesting redesignation/reimbursement of excess contribution for your records.

On behalf of VGMPAC we apologize for the errors we made and are taking corrective action so this does not happen in the future.

Sincerely,

Mike Mallaro  
Representing VGMPAC

2603915354



## **ETEXT ATTACHMENT**

VGMPAC (C00402545) received notice of exceeding receipt/expenditure limits during the validation process of the 2Q 2006 FEC Form 3X filing (see below for filing errors).

### **Filing Errors:**

#### **Receipts**

Miller, Van - Limit \$5000 - Actual \$11000

Walsh, Jim - Limit \$5000 - Actual \$7250

#### **Disbursements**

Whalen for Congress (primary) - Limit \$2100 - Actual \$5000

VGMPAC called FEC Business Analysis rep Jennifer immediately for thoughts on how to remedy our errors and her recommendations were as follows:

- 1) Refund excess contributions received and report this on line 28(a) of the 3Q 2006 Form 3X filing
- 2) Redesignate \$2100 of the \$5000 Whalen for Congress disbursement to the general fund & request reimbursement for the remaining \$800 excess contribution

- Notify Whalen in writing of redesignation/reimbursement & send copy of this same correspondence with a cover letter to the FEC at:

FEC

999 E St. NW

Washington, DC 20463

- Report redesignation on the 3Q 2006 Form 3X filing as 2 separate memo disbursement entries on line 23 with the 1st memo entry listing all info the same as originally entered on 2Q 2006 filing except update description to note redesignation. The 2nd memo entry should have the same info with these exceptions:

Date - Change to redesignation date

Amount - Change to redesignation amount

Election - Change to 'General'

Description - Change to 'Redesignation'

- Report \$800 refund from Whalen for Congress on line 16 of the 2006 Form 3X filing in the period in which the check is received

- 4) Immediately file Misc Electronic Submission (Form 99) to notify FEC of our intentions to correct the above errors.

### **Actions taken by VGMPAC:**

- 1) Refund checks were issued 7/18/06 to Van Miller for \$6000 (ck# 1042) & Jim Walsh for \$2250 (ck# 1043)
- 2) Letter dated 7/18/06 prepared notifying Whalen for Congress of the redesignation and request for \$800 reimbursement
- 3) Cover letter and supporting documentation dated 7/18/06 prepared notifying FEC of Whalen redesignation/reimbursement request
- 4) Filed Form 99 on 7/18/06 to notify FEC of our intentions to correct errors
- 5) Internally notifying responsible parties of receipt/disbursement limits to prevent these issues from reoccurring

Although these errors were not intentional, VGMPAC will continue to do everything we can to correct them immediately and prevent future reoccurrences.

\*\*\*\*\*



*Van G. Miller & Associates*

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July 18, 2006

Mike Whalen for Congress  
Attn: Andrea  
PO Box 750  
Bettendorf, IA 52722-9932

To Whom It May Concern:

I am writing to inform you of notification VGMPAC received from the FEC in regards to a payment we made to you in excess of contribution limits. Please see attached for a copy of this notice. On 4/24/06 VGMPAC check number 1030 was issued to Mike Whalen for Congress as a political contribution for the Primary election in the amount of \$5000. The 2005-2006 contribution limit for a non-multicandidate PAC such as ours is \$2100 per election.

Per recommendation of the FEC to correct this error, we are requesting you redesignate \$2100 of the above contribution from the Primary election to the General election campaign fund as of today's date, July 18, 2006. In addition, we are requesting you refund VGMPAC \$800 for the remaining excess contribution.

We apologize for our lack of understanding in regards to contribution limits and for any additional work this will cause your committee.

Sincerely,

Mike Mallaro  
Representing VGMPAC

2006071807



Federal Election Commission  
**ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS**  
 The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> USPS First Class Mail	Postmarked 7/20/06
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
Delivery Confirmation™ or Signature Confirmation™ Label <input type="checkbox"/>	
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
Next Business Day Delivery <input type="checkbox"/>	
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked

*lll*  
 PREPARER  
 (3/2005)

7/27/06  
 DATE PREPARED

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