

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

October 9, 2009

Betty Presley, Treasurer Our Country Deserves Better PAC 30151 Tomas Rancho Santa Marga, CA 92688

Response Due Date: November 13, 2009

Identification Number: C00454074

Reference: Mid-Year Report (4/1/09 - 6/30/09)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) 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 4 items:

- 1. The totals listed on Lines 7, 11(a)(i) and 11(a)(ii), Column B of the Summary and Detailed Summary Pages appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.
- 2. Schedule E discloses payments for several independent expenditures which were previously disclosed as debts on Schedule D of your April Quarterly Report (1/1/09-3/31/09), received 7/29/09. However, the dates of payment fall outside of the coverage dates for this reporting period. Please amend your report to clarify the dates of payment for these independent expenditures.
- 3. "Schedule E for Line 24 of your report discloses MEMO entries to "STUDIO Z RECORDING, INC.," "KKFT-TV," "KRNV-TV," "KTVN-TV," "KVBC-TV," "SPOT-ON," "KDWN RADIO," "KENV-TV," "KKOH-AM," "KLAS-TV," "KOLO-TV," "KRJC-KTSN," "KTNV-TV," "RUSSO MARSH + ASSOCIATES, INC.," "HUMAN EVENTS" and "PARAMOUNT COMMUNICATION GROUP" as the payees which require further clarification. If these MEMO entries were intended to

disclose additional information about the payments to "Russo Marsh + Associates, Inc," please amend your report to clarify the mathematical discrepancy. Please be advised that the sum of all memo entries supporting a specific disbursement on Schedule E should equal the amount of that disbursement. If this activity is an independent expenditure(s) disseminated this reporting period that will be paid in a later reporting period, please amend your report to also disclose this activity on a Schedule D supporting Line 10 if it is a reportable debt.

- 4. Schedule E of your report indicates that your committee may have failed to file one or more of the required 48 hour notices for independent expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more with respect to a given election, made any time during the calendar year up to and including the 20th day before an election. The notice must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. 11 CFR §104.3(b)
- -Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Other disbursements should be properly disclosed on a separate Schedule B, supporting Line 29 of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing.

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

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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) 694-1143.

Sincerely,

Kaitlin Eger

Campaign Finance Analyst Reports Analysis Division

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Missing 48 Hour Notices (Schedule E)

Name of Payee	Date	Amount	Purpose	Candidate
Russo Marsh +			Production Costs- Ad	:
Associates, Inc.	4/28/09	\$1,412.42	Against Harry Reid	Harry Reid
		72,	8	
			Graphic Design Costs for	
Creative Culcha	5/4/09	\$850.00	Ad	Harry Reid
California Image				:
Associates	5/12/09	\$1,423.52	Media Production Costs	Harry Reid
Endeavor Media				
Group, LLC	5/13/09	\$5,000.00	Email Newsletter Costs	Harry Reid
Russo Marsh +			Internet Newsletter Costs-	:
Associates, Inc.	5/15/09	\$32,352.94	Candidate Specific	Harry Reid
Endeavor Media			Email Newsletter- Candidate	
Group, LLC	5/17/09	\$4,000.00	Specific Anti Harry Reid	Harry Reid
Endeavor Media			Email Newsletter- Candidate	:]
Group, LLC	5/19/09	\$5,000.00	Specific Anti Harry Reid	Harry Reid
Endeavor Media			Email Newsletter- Candidate	į
Group, LLC	5/21/09	\$5,000.00	Specific	Harry Reid
Russo Marsh +		417.000.00	Media Buy- Candidate	
Associates, Inc.	5/21/09	\$15,000.00	Specific	Harry Reid
Russo Marsh +	5/01/00	625,000,00	Media Buy- Candidate	T D :
Associates, Inc.	5/21/09	\$25,000.00	Specific Ad	Harry Reid
			Malia Caralli	
D . D	5/00/00	Ø1 000 00	Media Consulting-	
Barton, Bryan	5/29/09	\$1,000.00	Candidate Specific	Harry Reid
			Wahaita Ad Cardid	
Smot O-	CIEIOO	የ ለ ንናር ርር	Website Ad- Candidate	IIow D - : 3
Spot-On	6/5/09	\$4,250.00	Specific	Harry Reid
			Media Consultina	
Barton Prior	6/10/09	\$1,000.00	Media Consulting- Candidate Specific	Horne Daid
Barton, Bryan	0/10/09	φ1,000.00	Candidate Specific	Harry Reid
Russo Marsh +			Internet Newsletter Costs-	
Associates, Inc.	6/16/09	\$21,601.73	Candidate Specific	Harry Reid
rissociates, inc.	0/10/09	Ψ21,001./3	Candidate Specific	Hally Keld