



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 25, 2020

MR. MIKE MALLARO, TREASURER
VGM MANAGEMENT LTD PAC (VGM PAC)
1111 W. SAN MARNAN DR.
WATERLOO, IA 50701

Response Due Date
04/29/2020

IDENTIFICATION NUMBER: C00402545

REFERENCE: YEAR-END REPORT (07/01/2019 - 12/31/2019)

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 1 item(s):

1. On Schedule B, you have disclosed disbursements to federal candidate committees. Commission regulations require that these itemized disbursements include the recipient's full name, complete address, date, amount, state of election, office sought (House, Senate, or President), and district (if applicable). Please amend your report to include the state of election, office sought and district (if applicable). (11 CFR §104.3 (b)(3))

- Your report discloses certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. For your information and consideration when preparing future filings, non-federal contributions 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. (52 U.S.C. §30104(b) and FORM 3X Instructions)

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.**

VGM MANAGEMENT LTD PAC (VGMPAC)

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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. For information about the report review process or specific filing information for your committee type, please visit www.fec.gov/help-candidates-and-committees. For more information about Requests for Additional Information (RAI), why you received a letter, and how to respond, please visit www.fec.gov/help-candidates-and-committees/request-additional-information. Should you 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) 694-1164.

Sincerely,

A handwritten signature in black ink that reads "Clyde Hinton". The signature is written in a cursive style with a horizontal line underneath the name.

Clyde Hinton
Campaign Finance Analyst
Reports Analysis Division