



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 21, 2008

Mara Vanderslice, Treasurer
Matthew 25 Network
25 E Street NW, Suite 200
Washington, DC 20001

Response Due Date:
December 22, 2008

Identification Number: C00449801

Reference: October Quarterly Report (7/1/08-9/30/08)

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 8 items:

1. Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30

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days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2))
The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

2. The identification of each contributor, including an adequate occupation and name of employer for each, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry inadequately identified as "Episcopal Diocese of California/rosalee@everyvoice.net," "self/self-employed," and "Self/Self Employed."

3. Please clarify all expenditures made for "Beverages," "Catering," and "Food" on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B or E supporting Lines 23 or 24 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

4. Schedule B discloses an expenditure(s) for "Ad Production," "Audio Visual for Event," "T-Shirt Design," and "Web Advertising." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as

appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

5. Schedule E of your report discloses the Calendar Year-To-Date Per Election for Office Sought total for President to be \$2,265.60 and \$43,082.74. However, FEC calculations disclose this amount(s) to be \$45,348.37. Please amend your report to clarify this discrepancy.

6. 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)

7. Your committee has filed a 48 hour notice for an independent expenditure supporting Barack Obama (see attached) which has not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on 48 hour notices must also be itemized on a corresponding Schedule E or MEMO Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend your report and any subsequent reports that may be affected by this correction.

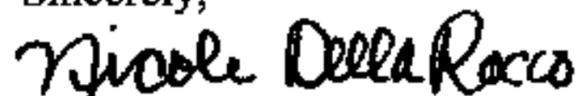
8. Your committee filed 48 hour notices informing the Commission of independent expenditures made in support or opposition of federal candidates with "National Catholic Reporter" and "Eleison Group" as the payee(s). However, the amounts or payee names disclosed on these notices

do not appear to correlate with the entries on Schedule E, supporting Line 24 for the reporting period. If your committee has filed 48 hour notices supporting independent expenditures not reflected on your reports, you must file Schedule E during the appropriate reporting period to disclose these payments. Please amend your report to clarify this discrepancy and provide further information concerning these notices.

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) 694-1139.

Sincerely,



Nicole Della Rocco
Campaign Finance Analyst
Reports Analysis Division

MATTHEW 25 NETWORK

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Missing 48 Hour Notices

Name of Payee	Date	Amount	Purpose	Candidate
Rotondaro, Alfred M.	7/14/08	\$1,186.67	Newspaper Advertisement	Obama, Barack
Sapp, Eric	7/22/08	\$2,851.36	Radio Ad Production	Obama, Barack
Sapp, Eric	7/22/08	\$2,641.14	Radio Ad Production	Obama, Barack
Eleison Group	7/23/08	\$5,000.00	Radio Ad Production	Obama, Barack

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MATTHEW 25 NETWORK

25 E STREET NW SUITE 200

WASHINGTON

DC 20001

FEC ID No. C00449801

24-Hour Notice 48-Hour Notice

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

PAGE OF 1/3
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) MATTHEW 25 NETWORK	FEC IDENTIFICATION NUMBER C C00449801
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Check if 24-hour notice 48-hour notice

Full Name (Last, First, Middle, Initial) of Payee Buying Time, LLC	Date MM / DD / YYYY 08 / 15 / 2008
Mailing Address 2715 M Street, NW	Amount 5344.80

City Washington	State DC	Zip Code 20007	Office Sought: <input type="checkbox"/> House State: DC <input type="checkbox"/> Senate District: _____ <input checked="" type="checkbox"/> Presidential
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Purpose of Expenditure TV Ad - Disseminated 8/16/08	Category/ Type	Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
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Name of Federal Candidate supported or Opposed by expenditure: BARACK OBAMA	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2008 <input type="checkbox"/> Other (specify): _____
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Calendar Year-To-Date Per Election for Office Sought	21394.94	Transaction ID: SE.4530
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Full Name (Last, First, Middle, Initial) of Payee Eleson Group	Date MM / DD / YYYY 07 / 18 / 2008
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Mailing Address 1665 North Fort Meyer; Suite 700	Amount 1061.14
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City Arlington	State VA	Zip Code 22209	Office Sought: <input type="checkbox"/> House State: DC <input type="checkbox"/> Senate District: _____ <input checked="" type="checkbox"/> Presidential
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Purpose of Expenditure Radio Ad Production	Category/ Type	Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
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Name of Federal Candidate supported or Opposed by expenditure: BARACK OBAMA	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General 2008 <input type="checkbox"/> Other (specify): _____
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Calendar Year-To-Date Per Election for Office Sought	6351.14	Transaction ID: SE.4531
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(a) SUBTOTAL of Itemized Independent Expenditures	6405.94
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

MARA VANDERSLICE
Signature
MM / DD / YYYY
08 / 18 / 2008

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ND

24 / 48 HOUR NOTICE OF INDEPENDENT / COORDINATED EXPENDITURE, on :

FEC ID No.

24-Hour Notice 48-Hour Notice

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

PAGE OF 2 / 3
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) MATTHEW 25 NETWORK	FEC IDENTIFICATION NUMBER C C00449801
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Check if 24-hour notice 48-hour notice

Full Name (Last, First, Middle, Initial) of Payee

Elison Group

Mailing Address

1665 North Fort Meyer; Suite 700

City	State	Zip Code
Arlington	VA	22209

Purpose of Expenditure

Radio Ad

Category/
Type

Name of Federal Candidate supported or Opposed by expenditure:

BARACK OBAMA

Calendar Year-To-Date Per Election
for Office Sought

6351.14

Date

M M / D D / Y Y Y Y
07 / 18 / 2008

Amount

1580.00

Office Sought:

House State: DC
 Senate District: _____
 Presidential

Check One:

Support Oppose

Disbursement For:

Primary General 2008

Other (specify) : _____

Transaction ID: SE.4532

Full Name (Last, First, Middle, Initial) of Payee

Elison Group

Mailing Address

1665 North Fort Meyer; Suite 700

City	State	Zip Code
Arlington	VA	22209

Purpose of Expenditure

Radio Ad

Category/
Type

Name of Federal Candidate supported or Opposed by expenditure:

BARACK OBAMA

Calendar Year-To-Date Per Election
for Office Sought

9062.14

Date

M M / D D / Y Y Y Y
08 / 02 / 2008

Amount

2711.00

Office Sought:

House State: DC
 Senate District: _____
 Presidential

Check One:

Support Oppose

Disbursement For:

Primary General 2008

Other (specify) : _____

Transaction ID: SE.4533

(a) SUBTOTAL of Itemized Independent Expenditures

4291.00

(b) SUBTOTAL of Unitemized Independent Expenditures

(c) TOTAL Independent Expenditures

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

MARA VANDERSLICE

Signature

M M / D D / Y Y Y Y
08 / 18 / 2008

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