



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

April 28, 2011

WES BOYD, TREASURER  
MOVEON.ORG POLITICAL ACTION  
PO BOX 9218  
BERKELEY, CA 94709

**Response Due Date****06/02/2011**

IDENTIFICATION NUMBER: C00341396

REFERENCE: 30 DAY POST-GENERAL REPORT (10/14/2010 - 11/22/2010)

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 5 item(s):

1. Schedule E of your report discloses the Calendar Year-To-Date Per Election for Office Sought total for Barbra Boxer/Carly Fiorina to be \$229,632.72, Robin Carnahan to be \$4,207.36, Alexander Giannoulis to be \$176,745.36. However, FEC calculations disclose this amount(s) to be \$52,887.36, \$4,599.36, and \$142,745.36, respectfully. Please amend your report to clarify this discrepancy.
2. Schedule A supporting Line 15 of your report discloses an offset to an operating expenditure(s) totaling \$34,730.48 from "ALEXI FOR ILLINOIS," "BENNET FOR COLORADO," "COMMITTEE TO ELECT ALAN GRAYSON," "FEINGOLD SENATE COMMITTEE," "FRIENDS FOR HARRY REID," "KUSTER FOR CONGRESS," "PEOPLE FOR PATTY MURRAY U S SENATE CAMPAIGN," "PERRIELLO FOR CONGRESS," however, your report(s) does not appear to disclose a disbursement to this entity. Please provide clarifying information regarding this activity and amend your report(s) if necessary.
3. Your committee filed 24 hour notices informing the Commission of independent expenditures made in support or opposition of federal candidates with "Buying Time, LLC," and "Charged" as the payees. However, the dates of public dissemination 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 24 hour notices supporting independent expenditures

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not reflected on your reports, you must file Schedule E during the appropriate reporting period to disclose these payments.

In addition, the Commission notes the Miscellaneous Electronic Submissions that were filed on October 22, 2010. However, the payments made in support of "PERRIELLO, THOMAS STUART PRICE" and "GIANNOULIAS, ALEXANDER" to "Buying Time, LLC" amounts do not match the independent expenditures reflected on Schedule E of your report. Please amend your report to clarify this discrepancy and provide further information concerning these notices.

4. Please clarify all expenditures made for "Catering" and "Lodging/Catering" 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 supporting Lines 23 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

5. Schedule B discloses an expenditure(s) for "Media Production," "Web Advertising," "Postage," "Media Consulting," "Printing," "List Management Services," and "List Purchase." 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.

**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

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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) 694-1164.

Sincerely,

A handwritten signature in black ink that reads "Nicole Miller". The signature is written in a cursive, flowing style.

Nicole Miller  
Campaign Finance Analyst  
Reports Analysis Division

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