

March 5, 2010

Karen Pichkhadze, Treasurer NORPAC P.O. Box 5595 Englewood, NJ 07631

Response Due Date:

April 9, 2010

Identification Number:

C00247403

Reference:

Amended Year End Report (12/1/09 – 12/31/09), received 1/29/10

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 items:

1. Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a committee and its affiliates from making contributions to another political committee and its affiliates in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an excessive contribution, you must notify the recipient and request a refund of the amount in excess of \$5,000. The refund of the excessive amount must be made within sixty (60) days of receipt of the contribution.

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund will be taken into consideration.

2. Your report discloses the apparent disbursement of earmarked contributions outside the permissible time period. As a conduit or intermediary for an authorized committee, your committee must forward any earmarked contribution, along with a transmittal report, no later than ten (10) days after receiving the earmarked contribution. 11 CFR §§102.8(a) and (c) and 110.6(c)(1)(iii) Further, your report appears to disclose an earmarked contribution to Harry Reid that was forwarded prior to being received.

If the earmarked contributions were incompletely or incorrectly disclosed, you should amend your report with clarifying information.

Although the Commission may take further legal action regarding the untimely forwarding of earmarked contributions, your prompt action in addressing the concerns raised will be taken into consideration.

- 3. Schedule A of your report discloses earmarked contributions totaling \$2,550, with no corresponding entries on Schedule B. Pursuant to 11 CFR \$110.6(c)(1)(v), all earmarked contributions that have passed through a conduit's account must be itemized on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of amount. All earmarked contributions that have been forwarded in the form of the contributor's check or written instrument must be itemized as memo entries on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of the amount. Please amend your report to clarify these discrepancies.
- 4. Schedule A of your report discloses earmarked contributions to Ros-Lehtinen for Congress totaling \$400 from Richard Finkel; however, you appear to have only forwarded \$100 to the candidate on Schedule B. Pursuant to 11 CFR §110.6(c)(1)(v), all earmarked contributions that have passed through a conduit's account must be itemized on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of amount. All earmarked contributions that have been forwarded in the form of the contributor's check or written instrument must be itemized as memo entries on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of the amount. Please amend your report to clarify these discrepancies.

5. Schedule B of your report discloses earmarked contributions totaling \$2,300, with no corresponding entries on Schedule A. Pursuant to 11 CFR §110.6(c), all earmarked contributions, that have passed through a conduit's account, must be itemized on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of the amount. All earmarked contributions that have been forwarded in the form of the contributor's check or written instrument must be itemized as memo entries on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of amount. Please identify the original contributors for the earmarked contributions disclosed on Schedule B.

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) 694-1157.

Sincerely,

Laura E. Sinram

Senior Campaign Finance Analyst

Jama E. Sonaro

Reports Analysis Division

Excessive Contribution to a Candidate

Recipient Name	Date	Amount	Election	Report
Leahy for U.S. Senator	11/22/09	\$5,000	G-2010	2009 December
Committee				Monthly
Leahy for U.S. Senator	12/21/09	\$711	G-2010	2009 Year End
Committee				