



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

July 26, 2018

CHRISTOPHER P. ROE, TREASURER
CUNA MUTUAL HOLDING COMPANY POLITICAL
ACTION COMMITTEE (CUNA MUTUAL PAC)
5910 MINERAL POINT RD, PO BOX 747
MAIL STOP 5910 4 A2
MADISON, WI 53701-0747

Response Due Date
08/30/2018

IDENTIFICATION NUMBER: C00402107

REFERENCE: JULY QUARTERLY REPORT (04/01/2018 - 06/30/2018)

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 enforcement action.** Additional information is needed for the following 1 item(s):

1. Schedule B supporting Line 23 discloses one or more contributions to candidates for the 2018 Primary election; however, the funds were disbursed after the election dates (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. (11 CFR §§110.1(b)(3) and 110.2(b)(3))

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contributions in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund. (11 CFR §103.3(b)(1) and (3))

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Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund or redesignation request sent to the recipient committees. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contributions will be taken into consideration.

- 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, contributions to federal candidates and committees should be properly disclosed on a separate Schedule B, supporting Line 23 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) (formerly 2 U.S.C §434(b)) and FORM 3X Instructions)

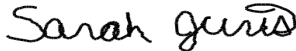
Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions 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.**

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 additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. 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) 694-1175.

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Sincerely,

A handwritten signature in black ink that reads "Sarah Juris". The signature is written in a cursive style with a loop at the end of the last name.

Sarah Juris
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

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Impermissible, Excessive, and Prohibited Contributions**CUNA Mutual Holding Company Political Action Committee (CUNA Mutual PAC) (C00402107)****Contributions Made After Election Date**

Recipient Name	Date	Amount	Election	Election (State-Date)
KEVIN MCCARTHY FOR CONGRESS	6/12/18	\$1,500.00	P2018	CA - 6/5/18
MCHENRY FOR CONGRESS	5/17/18	\$2,000.00	P2018	NC - 5/8/18
STIVERS FOR CONGRESS	6/11/18	\$1,000.00	P2018	OH - 5/8/18