



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

July 30, 2014

DONNIE MILLER, TREASURER  
EUGENE YU FOR CONGRESS, INC.  
PO BOX 2000  
EVANS, GA 30809

**Response Due Date**  
**09/03/2014**

IDENTIFICATION NUMBER: C00547158

REFERENCE: JULY QUARTERLY REPORT (05/01/2014 - 06/30/2014)

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 7 item(s):

1. Please provide a Schedule A to support the amount disclosed on Line 11(a) (i) of the Detailed Summary Page. Contributions from individuals/persons other than political committees that aggregate in excess of \$200 per election cycle must be itemized on Schedule A. (11 CFR §104.3(a)(4)(i))
2. Your committee filed a 48-hour notice disclosing a "last minute" contribution from The Right Group on 5/14/14. This contribution does not appear on a Schedule A of this report. Please amend your report to include this contribution or provide an explanation of this apparent discrepancy. (11 CFR § 104.3(a)(4)(i))
3. The loan payment(s) disclosed on Schedule B does not equal the loan payment(s) itemized on Schedule C. Each loan payment made by the committee must be itemized on Schedule B, regardless of the amount of the payment, and included in the payment to date calculation on Schedule C. Please correct this discrepancy and file an amendment to your report. (11 CFR § 104.3(b)(4)(iii))
4. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 17 of your report to clarify the following description(s): "Consulting," "Consulting Fee," "Facebook," "Grasshopper," "Mail Chimp," and "Twitter." For further guidance regarding acceptable purposes of disbursement, please

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refer to 11 CFR 104.3(b)(4)(i)(A).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register is available on the FEC website at [www.fec.gov/law/policy/purposeofdisbursement/inadequate\\_purpose\\_list\\_3507.pdf](http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf). A non-exhaustive list of acceptable purposes is also available on the FEC website at <http://www.fec.gov/rad/pacs/documents/ExamplesofAdequatePurposes.pdf>.

**5.** Schedule B of your report discloses reimbursements to individuals for the following disbursement(s): "Campaign Sign Materials." Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in an election cycle, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information on Schedule B and clearly identify each memo entry supporting a reimbursement. If itemization is not necessary, you must indicate so in an amendment to this report. (11 CFR §§ 104.3(b)(4)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3)

**6.** Schedule B of your report discloses reimbursements to individuals for the following travel-related disbursement(s): "Campaign Travel, Coffee County Debate" and "Campaign Travel Expenses." When the reimbursement amount to individuals for travel and subsistence advances exceeds \$500, the payments by staff to any one vendor that make up the reimbursement may have to be itemized. For example, if the related payments to any one vendor aggregate in excess of \$200 for the election cycle, the staff advance payment to the vendor must also be itemized in a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount, and detailed purpose of the advance. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must indicate so in an amendment to this report. Please amend your report to include the missing or clarifying information. See Advisory Opinion 1996-20 for additional clarification. (11 CFR § 104.9)

**7.** Schedule C of your report discloses loans from the candidate where the aggregate amount outstanding in excess of \$250,000.00 was not repaid within 20 days after the primary election.

Outstanding loan amounts from the personal funds of the candidate aggregating

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in excess of \$250,000.00 and designated to the primary election must be repaid within 20 days after that election. If loans are not repaid by the twenty-day deadline, the committee must treat the portion of the aggregate outstanding balance that exceeds \$250,000.00 as a contribution from the candidate, which cannot be repaid. (11 CFR § 116.11)

If any of the apparent loans in question were incompletely or incorrectly disclosed, you must amend your original report with the clarifying information. Otherwise, you must amend your report to show the outstanding balance of candidate loans for the primary election exceeding \$250,000.00 as a contribution from the candidate.

**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) 694-1395.

Sincerely,



Ben Holly  
Senior Campaign Finance Analyst  
Reports Analysis Division