



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

February 26, 2015

REED SPANGLER, TREASURER  
CAPITO FOR WEST VIRGINIA  
P.O. BOX 11519  
CHARLESTON, WV 25339

**Response Due Date**  
**04/02/2015**

IDENTIFICATION NUMBER: C00539825

REFERENCE: 30 DAY POST-GENERAL REPORT (10/16/2014 - 11/24/2014)

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. **An adequate response must be received at the Senate Public Records Office by the response date noted above. 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 2 item(s):

1. Schedule A of your report discloses a transfer(s) from the joint fundraising representative committee "Friends of Winning Women." However, your report lacks memo entries supporting the transfer(s).

Please be advised that when a committee receives a transfer from a joint fundraising representative, the committee must report its share of net proceeds received from the representative as a transfer-in on Schedule A supporting Line 12. A memo schedule A must be provided to itemize the committee's share of the gross contributions received through the joint fundraiser. The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the election cycle and all political committees, regardless of the amount of the contribution. (11 CFR § 102.17(c)(8)(i)(B)) When itemizing gross contributions, the committee must report the date of receipt as the day the joint fundraising representative received the contribution. (11 CFR § 102.17(c)(3)(iii)) Please amend your report or clarify the omission of memo entries.

2. Schedule A of your report indicates that your committee may have failed to file a required 48-hour notices regarding a "last minute" contribution received by your committee after the close of books for the 12 Day Pre-General Report.

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You have an explanation for the contribution received from Jack C. Taylor received on 10/21/14 in the amount of \$2600. You note that "contribution incorrectly reported on 10/." Please explain in more detail why the 48 hour notice is missing for this contribution. A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. The failure to file 48-hour notices may result in civil money penalties or legal enforcement action. (11 CFR § 104.5(f))

If any contribution of \$1,000 or more was incorrectly reported, you must amend your original report with the clarifying information. For each contribution received by a joint fundraising representative and subsequently transferred to your committee, please ensure that your report discloses the original date of receipt of the contribution by the joint fundraising representative in a memo entry supporting the transfer. The entry for the transfer itself should show the date the contribution was transferred to your committee by the joint fundraising representative.

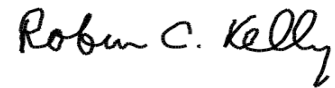
**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions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

A written response or an amendment to your original report(s) correcting the above problems should be filed with the Senate Public Records Office. Please contact the Senate Public Records Office at (202) 224-0322 for instructions on how and where to file an amendment. 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) 694-1170.

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Sincerely,

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

Robin Kelly  
Senior Campaign Finance Analyst  
Reports Analysis Division

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