



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

October 30, 2009

Ms. Maureen M. Ryan, Treasurer  
EdisonLearning Inc Political Action Committee  
485 Lexington Avenue  
2<sup>nd</sup> Floor  
New York, NY 10017-2630

Response Due Date:  
December 4, 2009

Identification Number: C00413583

Reference: Mid-Year Report (1/1/09-6/30/09)

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 3 items:

1. Your committee has filed a report that contains financial activity already disclosed on another report. Overlapping coverage dates create difficulties in accounting for cash flow from one report to another. Please amend this report by including only the financial transactions that occurred between 2/1/09 and 6/30/09. 2 U.S.C. §434(b)
2. Schedule A of your report discloses a receipt from EdisonLearning Inc. Political Action Committee, with the purpose "transfer to non federal PAC redposited" totaling \$5,000 for the apparent misdeposit of contributions originally intended for the non-federal account. Please be advised, contributions deposited in a federal account must meet the following conditions: the contributions are designated or expressly solicited for use in connection with federal elections and contributors are informed that their contributions are subject to the limits and prohibitions of the Act. 11 CFR §102.5(a)

The Commission notes the transfer-out of the misdeposited funds disclosed on your Mid-Year Report. Although the Commission may take further legal action regarding the misdeposited funds, your prompt action will be taken into consideration.

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3. Schedule B supporting Line 23 of your report discloses a \$5,000 disbursement for "Transfer to other PAC that was mistakenly redeposited to federal PAC". You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. Previously filed reports by your committee do not appear to disclose the original receipt of the apparent impermissible contribution on Schedule A. Please amend the report covering the period during which the transaction occurred to disclose the receipt of these funds.

**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) 694-1153.

Sincerely,



for:

Kristin DeCarminé  
Senior Campaign Finance Analyst  
Reports Analysis Division

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