



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 29, 2015

ZACK BOOTH SIMPSON, TREASURER
COUNTERPAC
2150 ALLSTON WAY SUITE 340
BERKELEY, CA 94704

Response Due Date
06/03/2015

IDENTIFICATION NUMBER: C00566778

REFERENCE: AMENDED 30 DAY POST-GENERAL REPORT (10/16/2014 -
11/24/2014), RECEIVED 12/05/2014

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 1 item(s):

- Schedule E of your report indicates that your committee may have failed to timely file one or more of the required 24 hour report(s) regarding "last minute" independent expenditures (see attached). A political committee must file a 24 hour report with the Federal Election Commission as specified in 11 CFR §104.4(c), within 24 hours of any independent expenditures of \$1,000 or more with respect to a given election, made between two and twenty days before an election. The report must be received by the Commission by 11:59 p.m. on the day following the date on which independent expenditures that aggregate \$1,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. (11 CFR §104.3(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

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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) 694-1173.

Sincerely,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, positioned below the word "Sincerely,".

Elliot Matthews
Campaign Finance Analyst
Reports Analysis Division

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Late 24 Hour Report (Schedule E)
CounterPAC (C00566778)

Name of Payee	Dissemination Date	Amount	Candidate	Election	Report Received
Groundswell Public Strategies	10/17/14	\$100,000	Nick J. Rahall II	G2014	10/23/14
Groundswell Public Strategies	10/20/14	\$100,000	Nick J. Rahall II	G2014	10/23/14