



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 26, 2012

MR. RANDALL BROZ, TREASURER
EDPAC
499 SOUTH CAPITOL ST. SW, SUITE 422
WASHINGTON, DC 20003

Response Due Date
05/31/2012

IDENTIFICATION NUMBER: C00467837

REFERENCE: YEAR-END REPORT (07/01/2011 - 12/31/2011)

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 1 item(s):

- Your report discloses a reimbursement(s) for "Reimbursement - Food and Beverage Expense, "Reimbursement - Travel Expense," "Reimbursement - Travel and Lodging Expense," "Reimbursement - Office Supplies," and "Reimbursement - Postage" to "Political Development Group, LLC," an apparent corporation. This appears to be an in-kind contribution made on behalf of your committee, as the original payment for the goods and services has been made by an entity other than your committee. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, salaries, telephone service, office equipment and supplies.

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), unaffiliated political committee, or any other entity would be considered an in-kind contribution from that person, committee or entity, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 C.F.R. §104.3, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b. Please be advised that 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation. Limited liability companies (LLC's) that choose to be treated as corporations under the Internal Revenue Service rules, or have shares that are traded publicly, are considered corporations.

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Please clarify the reimbursement(s) for apparent administrative expenses made to "Political Development Group, LLC" by your committee and provide the date(s) the goods/services were provided.

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) 694-1173.

Sincerely,

A handwritten signature in black ink that reads "Ashley Carter". The signature is written in a cursive, flowing style.

Ashley Carter
Senior Campaign Finance Analyst
Reports Analysis Division