



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

January 22, 2013

KELLY LAWLER, TREASURER  
CONSERVATIVE CAMPAIGN COMMITTEE  
PO BOX 984  
WILLOWS, CA 95988-0984

**Response Due Date**  
**02/26/2013**

IDENTIFICATION NUMBER: C00495010

REFERENCE: OCTOBER MONTHLY REPORT (09/01/2012 - 09/30/2012)

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 4 item(s):

1. Line 24 of the Detailed Summary Page of your report discloses a total of \$173,506.18 in expenditures. The sum of the entries itemized on Schedule E, however, indicates the total to be \$194,636.16. Please amend your report to clarify the discrepancy. (11 CFR § 104.3(a) and (b))
2. Schedule D supporting Line 10 of your report discloses debts incurred this period totaling \$5,958.18 owed to Russo Marsh & Associates, Inc. for apparent independent expenditures. However, a MEMO Schedule E has not been provided. Please be advised that if a communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated or distributed, and on a Schedule D if it is a reportable debt under 11 CFR §104.11. Subsequently, when the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable. Please amend your report to clarify this apparent discrepancy or provide clarifying information regarding the nature of this debt. (11 CFR §104.4)
3. Schedule E of your report indicates that your committee may have failed to file one or more of the required 48 hour report(s) for independent expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more with

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respect to a given election, made any time during the calendar year up to and including the 20th day before an election. The report must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 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))

4. Your committee has filed **24 and 48** hour reports for independent expenditures **opposing Barack Obama and supporting Mitt Romney** (see attached) which has not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on **24 and 48** hour reports must also be itemized on a corresponding Schedule E or MEMO Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend your report and any subsequent reports that may be affected by this correction. (11 CFR §104.4)

**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) 694-1169.

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Sincerely,

A handwritten signature in black ink that reads "Kevin Fortkiewicz". The signature is written in a cursive style with a large initial "K" and "F".

Kevin Fortkiewicz  
Campaign Finance Analyst  
Reports Analysis Division

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**Missing 48 Hour Report (Schedule E)**  
**Conservative Campaign Committee (C00495010)**

| <b>Name of Payee</b>           | <b>Date</b> | <b>Amount</b> | <b>Candidate</b> | <b>Election</b> |
|--------------------------------|-------------|---------------|------------------|-----------------|
| Russo Marsh & Associates, Inc. | 9/18/12     | \$7,129.98    | Mitt Romney      | G2012           |

**Missing Schedule E (24 and 48 Hour Report)****Conservative Campaign Committee (C00495010)**

| <b>Name of Payee</b>           | <b>Date</b> | <b>Amount</b> | <b>Candidate</b> | <b>Election</b> |
|--------------------------------|-------------|---------------|------------------|-----------------|
| Premiere Transportation        | 9/7/12      | \$77,000.00   | Barack Obama     | G2012           |
| Russo Marsh & Associates, Inc. | 9/18/12     | \$3,269.02    | Barack Obama     | G2012           |
| Russo Marsh & Associates, Inc. | 9/18/12     | \$13,085.90   | Barack Obama     | G2012           |
|                                |             |               |                  |                 |
| Russo Marsh & Associates, Inc. | 9/4/12      | \$2,689.16    | Mitt Romney      | G2012           |
| Relevant Productions, LLC      | 9/17/12     | \$5,950.00    | Mitt Romney      | G2012           |
| Russo Marsh & Associates, Inc. | 9/18/12     | \$13,085.90   | Mitt Romney      | G2012           |