



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

August 5, 2015

LOGAN D. DELANY JR, TREASURER
CARSON AMERICA
1800 DIAGONAL ROAD STE 140
ALEXANDRIA, VA 22314

Response Due Date

09/09/2015

IDENTIFICATION NUMBER: C00573519

REFERENCE: JULY QUARTERLY REPORT (04/01/2015 - 06/30/2015)

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 6 item(s):

1. Schedule A-P of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached). The Commission notes your additional explanation regarding the committee's corrective action taken for some of these contributions.

An individual or a political committee other than an authorized committee or a qualified multi-candidate committee may not make a contribution(s) to a candidate for federal office in excess of \$2,700 per election. An authorized committee may not make a contribution(s) to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (52 U.S.C. § 30116(a) and (f) (formerly 2 U.S.C. § 441a(a) and (f)); 11 CFR §§ 110.1(b), (e) and (k), and 102.13(c))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with clarifying information.

Please be reminded that all refunds, redesignations and reattributions must be

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made within 60 days of receipt of the contribution. To date, one or more of the apparent excessive contributions have not been refunded, redesignated, or reattributed.

For reattributions, the funds can be retained if, within 60 days of receipt, the excessive amount was properly reattributed to another person. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written documentation, signed by each contributor, authorizing a reattribution and indicating the amount of the contribution to be attributed to each contributor; or (2) the committee reattributes by presumption the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor who signed the check an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

For redesignations, the funds can be retained if, within 60 days of receipt, the excessive amount was properly designated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election; or (2) the committee redesignates by presumption the excessive portion of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) A contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt, the excessive amount must be refunded. (11 CFR § 103.3(b)(1))

Please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/or letters reattributing or

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redesignating the contributions in question. Refunds are reported on Line 28(a), (b), or (c), as applicable, of the Detailed Summary Page and on a supporting Schedule B-P of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A-P of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR § 104.8(d)(2), (3) and (4))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund or redesignate and/or reattribute the excessive amount will be taken into consideration.

2. Schedule A-P (see attached) discloses a contribution(s) from an individual(s) who has a mailing address outside of the United States of America. Please be advised that 52 U.S.C. § 30121(a) (formerly 2 U.S.C. § 441e(a)) and 11 CFR § 110.20 prohibit foreign nationals from making contributions in connection with any election for political office or in connection with any primary election, convention, or caucus held to select candidates for any political office.

If the apparently prohibited contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If your committee follows the safe harbor guidelines outlined under 11 CFR § 110.20(a)(7) for all contributions received from a foreign address to ensure that the sources of these contributions are not foreign nationals, please provide a detailed description of your procedures. These procedures must be used in all cases where a contributor or donor uses a foreign passport or passport number for identification purposes, provides a foreign address, makes a contribution or donation by means of a check or other written instrument drawn on a foreign bank or by wire transfer from a foreign bank, or resides abroad. A committee is deemed to have conducted a reasonable inquiry into the contributor or donor's nationality if you seek and obtain copies of current and valid U.S. passport papers for U.S. citizens. No person may rely on this safe harbor if he or she has actual knowledge that the source of the funds solicited, accepted, or received is a foreign national.

If you have received a contribution from a foreign national, you must refund the impermissible contribution to the donor in accordance with 11 CFR § 103.3(b). Please inform the Commission of your corrective action immediately

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in writing and provide a photocopy of your check for the refund. In addition, any refunds should be disclosed on Schedule B supporting Line 28(a) of the report during which the transaction was made. Although the Commission may take further legal action concerning the acceptance of a prohibited contribution(s), prompt action on your part to refund or provide clarifying information concerning these contributions will be taken into consideration.

3. Commission Regulations require the continuous reporting of all outstanding loans. This report omits the loan(s) itemized on your previous report(s). Please amend your report(s) to indicate the current status of the following loan(s): Dr. Benjamin S. Carson Sr. - \$25,000.00. (11 CFR §§ 104.3(d) and 104.11)

4. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B-P supporting Line 23 of your report to clarify the following description(s): "Publications." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(4)(i)(A).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf.

5. Schedule B-P of your report discloses a reimbursement to an individual, "Barry Bennett," for the following disbursement(s): "Pens/Paper/Ink." Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in an election cycle, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information on Schedule B-P and clearly identify each memo entry supporting a reimbursement. If itemization is not necessary, you must indicate so in an amendment to this report. (11 CFR §§104.3(b)(4)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3)

6. Schedule B-P of your report discloses a reimbursement to an individual, "Brian Haley," for the following travel related disbursement(s): "Travel." When the reimbursement amount to individuals for travel and subsistence advances exceeds \$500, the payments by staff to any one vendor that make up the reimbursement may have to be itemized. For example, if the related payments to any one vendor aggregate in excess of \$200 for the election cycle, the staff advance payment to the vendor must also be itemized in a memo entry

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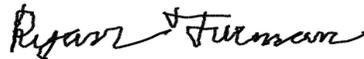
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for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and detailed purpose of the advance. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must indicate so in an amendment to this report. Please amend your report to include the missing or clarifying information. See Advisory Opinion 1996-20 for additional clarification. (11 CFR § 104.9)

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) 694-1151.

Sincerely,



Ryan Furman
Senior Campaign Finance Analyst
Reports Analysis Division

Excessive, Prohibited, and Impermissible Contributions
Carson America (C00573519)

Excessive Contributions from Individuals

Contributor Name	Date	Amount	Election
Bainum, Jane L. Ms.	6/30/15	\$5,000.00	P2016
Bergkamp Sr, James L	4/23/15	\$1,000.00	P2016
Bergkamp Sr, James L	5/13/15	\$2,500.00	P2016
Bergkamp Sr, James L	6/30/15	\$2,700.00	P2016
Canon, Jo	3/12/15	\$250.00	P2016
Canon, Jo	3/24/15	\$200.00	P2016
Canon, Jo	3/25/15	\$500.00	P2016
Canon, Jo	4/22/15	\$500.00	P2016
Canon, Jo	5/4/15	\$1,000.00	P2016
Canon, Jo	5/9/15	\$500.00	P2016
Canon, Jo	5/22/15	\$25.00	P2016
Canon, Jo	5/23/15	-\$250.00	P2016
Canon, Jo	5/27/15	\$250.00	P2016
Canon, Jo	5/31/15	\$500.00	P2016
Canon, Jo	6/21/15	\$100.00	P2016
Canon, Jo	6/26/15	\$100.00	P2016
Canon, Jo	6/26/15	\$100.00	P2016
Chernesky, Richard J. Mr.	4/14/15	\$2,700.00	P2016
Chernesky, Richard J. Mr.	6/30/15	\$100.00	P2016
Clapp, Macie Mrs.	3/30/15	\$600.00	P2016
Clapp, Macie Mrs.	4/13/15	\$600.00	P2016
Clapp, Macie Mrs.	4/20/15	\$600.00	P2016
Clapp, Macie Mrs.	4/27/15	\$600.00	P2016
Clapp, Macie Mrs.	5/5/15	-\$1,050.00	P2016
Clapp, Macie Mrs.	5/5/15	\$1,350.00	P2016
Clapp, Macie Mrs.	5/18/15	-\$900.00	P2016
Clapp, Macie Mrs.	5/18/15	\$900.00	P2016
Clapp, Macie Mrs.	6/15/15	-\$750.00	P2016
Clapp, Macie Mrs.	6/15/15	\$900.00	P2016
Clapp, Macie Mrs.	6/19/15	\$100.00	P2016
Collins, Thelma	3/31/15	\$500.00	P2016
Collins, Thelma	6/13/15	\$2,700.00	P2016

Excessive, Prohibited, and Impermissible Contributions**Carson America (C00573519)**

Crusoe, Agnes Pesti Ms.	4/2/15	\$115.00	P2016
Crusoe, Agnes Pesti Ms.	5/12/15	\$145.00	P2016
Pesti-Crusoe, Agnes Ms.	5/12/15	\$1,000.00	P2016
Crusoe, Agnes Pesti Ms.	6/9/15	\$500.00	P2016
Pesti-Crusoe, Agnes Ms.	6/9/15	\$500.00	P2016
Crusoe, Agnes Pesti Ms.	6/19/15	\$175.00	P2016
Pesti-Crusoe, Agnes Ms.	6/22/15	\$1,000.00	P2016
Figge, Patricia	3/31/15	\$1,000.00	P2016
Figge, Patricia Ms.	4/28/15	-\$1,000.00	P2016
Figge, Patricia Ms.	4/28/15	\$2,700.00	P2016
Figge, Patricia Ms.	5/7/15	-\$1,700.00	P2016
Figge, Patricia Ms.	5/7/15	\$5,000.00	P2016
Gates, Tom	5/24/15	\$5,400.00	P2016
Gilbert, Lambert O. Mr.	4/8/15	\$600.00	P2016
Gilbert, Lambert O. Mr.	5/8/15	\$1,500.00	P2016
Gilbert, Lambert O. Mr.	6/17/15	\$2,250.00	P2016
Gust, Judith A. Mrs.	5/4/15	\$1,000.00	P2016
Gust, Judith A. Mrs.	5/19/15	\$100.00	P2016
Gust, Judith A. Mrs.	6/24/15	\$100.00	P2016
Gust, Judith A. Mrs.	6/28/15	\$100.00	P2016
Gust, Judith A. Mrs.	6/30/15	\$500.00	P2016
Gust, Judith A. Mrs.	6/30/15	\$1,000.00	P2016
Gust, Judith A. Mrs.	6/30/15	\$1,500.00	P2016
Hanford, Dorothy J. Ms.	5/11/15	\$1,000.00	P2016
Hanford, Dorothy J. Ms.	5/11/15	\$1,000.00	P2016
Hanford, Dorothy J. Ms.	5/13/15	\$100.00	P2016
Hanford, Dorothy J. Ms.	6/8/15	\$125.00	P2016
Hanford, Dorothy J. Ms.	6/12/15	\$1,023.00	P2016
Hanford, Dorothy J. Ms.	6/17/15	\$1,100.00	P2016
Hanford, Dorothy J. Ms.	6/29/15	\$2,000.00	P2016
Hardin, Virginia F. Ms.	4/8/15	\$500.00	P2016
Hardin, Virginia F. Ms.	5/11/15	\$500.00	P2016
Hardin, Virginia F. Ms.	6/9/15	\$1,000.00	P2016
Hardin, Virginia F. Ms.	6/25/15	\$1,000.00	P2016

Excessive, Prohibited, and Impermissible Contributions
Carson America (C00573519)

Hoogendoorn, Kevin	6/26/15	\$5,400.00	P2016
Johnson, Justin Mr.	5/15/15	\$1,000.00	P2016
Johnson, Justin Mr.	6/15/15	\$1,000.00	P2016
Johnson, Justin Mr.	6/27/15	\$1,000.00	P2016
Katz, Adam Mr.	4/29/15	\$5,400.00	P2016
Kimball, Dyrel L.	3/11/15	\$500.00	P2016
Kimball, Dyrel L.	3/23/15	\$500.00	P2016
Kimball, Dyrel L. Mr.	5/4/15	\$300.00	P2016
Kimball, Dyrel L. Mr.	5/7/15	\$500.00	P2016
Kimball, Dyrel L. Mr.	5/11/15	\$500.00	P2016
Kimball, Dyrel L. Mr.	5/15/15	\$500.00	P2016
Kimball, Dyrel L. Mr.	5/25/15	-\$100.00	P2016
Kimball, Dyrel L. Mr.	6/12/15	\$1,000.00	P2016
Kimball, Dyrel L. Mr.	6/30/15	\$500.00	P2016
Lebewohl, Alice O. Ms.	4/13/15	\$2,000.00	P2016
Lebewohl, Alice O. Ms.	5/12/15	\$200.00	P2016
Lebewohl, Alice O. Ms.	5/18/15	\$500.00	P2016
Lebewohl, Alice O. Ms.	5/27/15	-\$2,200.00	P2016
Lebewohl, Alice O. Ms.	5/27/15	\$6,000.00	P2016
Lebewohl, Alice O. Ms.	6/1/15	-\$500.00	P2016
Lebewohl, Alice O. Ms.	6/1/15	\$500.00	P2016
Lebewohl, Alice O. Ms.	6/17/15	\$1,000.00	P2016
Loring, Janet	3/30/15	\$1,000.00	P2016
Loring, Janet	5/4/15	\$1,000.00	P2016
L, Janet	6/30/15	\$1,000.00	P2016
Lotyanu, Emil Ms.	4/15/15	\$1,000.00	P2016
Lotyanu, Emil Ms.	5/12/15	-\$2,700.00	P2016
Lotyanu, Emil Ms.	5/12/15	\$5,000.00	P2016
Madden, Wales H. Mr. Jr.	6/29/15	\$5,400.00	P2016
Marshall, George F. Mr.	6/30/15	\$1,000.00	P2016
Marshall, George F. Mr.	6/30/15	\$2,000.00	P2016
Martin, Robert T. Mr.	5/26/15	\$2,000.00	P2016

Excessive, Prohibited, and Impermissible Contributions
Carson America (C00573519)

Martin, Robert T. Mr.	6/29/15	\$1,000.00	P2016
Mathews, Gilbert	3/5/15	\$1,000.00	P2016
Mathews, Gilbert	3/12/15	\$2,000.00	P2016
Mathews, Gilbert	3/27/15	\$1,000.00	P2016
Mathews, Gilbert	3/27/15	-\$1,000.00	P2016
Mathews, Gilbert	3/31/15	\$1,000.00	P2016
Mathews, Gilbert	4/2/15	\$1,000.00	P2016
Mathews, Gilbert	4/9/15	\$500.00	P2016
Mathews, Gilbert	4/27/15	-\$1,000.00	P2016
Mathews, Gilbert	4/27/15	-\$300.00	P2016
Mathews, Gilbert	5/5/15	\$1,000.00	P2016
Mathews, Gilbert	5/7/15	\$1,000.00	P2016
Mathews, Gilbert	5/19/15	-\$1,000.00	P2016
Mathews, Gilbert	5/19/15	-\$500.00	P2016
Mathews, Gilbert	5/19/15	-\$1,000.00	P2016
Mathews, Gilbert	5/19/15	-\$200.00	P2016
Mathews, Gilbert	6/30/15	\$500.00	P2016
May, Robert	3/31/15	\$250.00	P2016
May, Robert	3/31/15	\$250.00	P2016
May, Robert A. Mr.	6/1/15	\$2,000.00	P2016
May, Robert A. Mr.	6/30/15	\$250.00	P2016
Mayer, Sandra Mrs.	4/27/15	\$100.00	P2016
Mayer, Sandra Mrs.	6/1/15	\$2,600.00	P2016
Mayer, Sandra Mrs.	6/30/15	\$25.00	P2016
McPeek, Lawrence A.	3/19/15	\$1,000.00	P2016
McPeek, Lawrence A.	5/7/15	\$1,000.00	P2016
McPeek, Lawrence A.	6/29/15	\$1,000.00	P2016
Moran, Michael E. Mr.	3/17/15	\$300.00	P2016
Moran, Michael E. Mr.	3/24/15	\$300.00	P2016
Moran, Michael E. Mr.	4/3/15	\$200.00	P2016
Moran, Michael E. Mr.	4/20/15	\$300.00	P2016
Moran, Michael E. Mr.	5/11/15	\$200.00	P2016
Moran, Michael E. Mr.	5/27/15	\$450.00	P2016
Moran, Michael E. Mr.	6/1/15	\$400.00	P2016
Moran, Michael E. Mr.	6/9/15	\$500.00	P2016
Moran, Michael E. Mr.	6/23/15	\$400.00	P2016

Excessive, Prohibited, and Impermissible Contributions
Carson America (C00573519)

Murphy, Daniel	3/17/15	\$1,000.00	P2016
Murphy, Daniel	5/28/15	\$2,700.00	P2016
Nix, Tom E. Mr. Jr.	4/1/15	\$250.00	P2016
Nix, Tom E. Mr. Jr.	4/20/15	\$1,000.00	P2016
Nix, Tom E. Mr. Jr.	6/2/15	\$2,000.00	P2016
Parker, Howard F.	3/3/15	\$2,700.00	P2016
Parker, Howard F.	6/2/15	\$2,700.00	P2016
Peters, Renee Mrs.	3/11/15	\$5,000.00	P2016
Peters, Renee Mrs.	3/11/15	-\$2,300.00	P2016
Peters, Renee Mrs.	5/8/15	\$150.00	P2016
Peters, Renee Mrs.	5/8/15	-\$150.00	P2016
Peters, Renee Mrs.	6/18/15	-\$100.00	P2016
Peters, Renee Mrs.	6/18/15	\$100.00	P2016
Peters, Renee Mrs.	6/29/15	\$500.00	P2016
Pifer, Sylvia	5/20/15	\$2,700.00	P2016
Pifer, Sylvia	6/27/15	\$20.16	P2016
Purkey, Fredna S. Mr.	4/20/15	\$2,700.00	P2016
Purkey, Fredna S. Mr.	6/17/15	\$2,700.00	P2016
Quilhot, Jeanette S. Ms.	4/9/15	\$5,000.00	P2016
Quilhot, Jeanette S. Ms.	5/6/15	-\$2,300.00	P2016
Quilhot, Jeanette S. Ms.	5/13/15	-\$2,700.00	P2016
Quilhot, Jeanette S. Ms.	5/13/15	\$5,000.00	P2016
Rosenberg, Gary L. Mr.	5/11/15	\$1,000.00	P2016
Rosenberg, Gary L. Mr.	6/22/15	\$2,000.00	P2016
Stoker, Richard Mr.	3/24/15	\$300.00	P2016
Stoker, Richard C. Mr.	4/12/15	\$1,000.00	P2016
Stoker, Richard C. Mr.	5/5/15	\$2,700.00	P2016
Stoker, Richard C. Mr.	6/23/15	\$5,400.00	P2016
Sumida, Alice E. Mrs.	4/6/15	\$2,000.00	P2016
Sumida, Alice E. Mrs.	5/22/15	\$3,000.00	P2016
Sumida, Alice E. Mrs.	6/18/15	\$1,000.00	P2016

**Excessive, Prohibited, and Impermissible Contributions
Carson America (C00573519)**

Von Wupperfeld, Peter	6/27/15	\$5,000.00	P2016
Wiggins, June C. Ms.	6/18/15	\$4,500.00	P2016
Wood Zenthoef er, Kathryn Dr.	3/6/15	\$2,700.00	P2016
Wood Zenthoef er, Kathryn Dr.	5/6/15	\$250.00	P2016
Wood Zenthoef er, Kathryn Dr.	5/13/15	\$100.00	P2016
Wood Zenthoef er, Kathryn Dr.	5/18/15	\$100.00	P2016
Wood Zenthoef er, Kathryn Dr.	6/12/15	\$1,350.00	P2016
Wood Zenthoef er, Kathryn Dr.	6/16/15	\$100.00	P2016
Yanney, James Dr. M.D.	3/5/15	\$250.00	P2016
Yanney, James Dr. M.D.	3/12/15	\$1,000.00	P2016
Yanney, James Dr. M.D.	3/29/15	\$250.00	P2016
Yanney, James Dr. M.D.	3/31/15	\$1,000.00	P2016
Yanney, James Dr.	4/9/15	\$500.00	P2016
Yanney, James Dr.	4/16/15	\$250.00	P2016
Yanney, James Dr.	4/21/15	\$250.00	P2016
Yanney, James Dr.	4/26/15	-\$300.00	P2016
Yanney, James Dr.	4/29/15	\$250.00	P2016
Yanney, James Dr.	5/5/15	\$250.00	P2016
Yanney, James Dr.	5/16/15	\$250.00	P2016
Yanney, James Dr.	5/18/15	-\$250.00	P2016
Yanney, James Dr.	5/18/15	-\$250.00	P2016
Yanney, James Dr.	5/18/15	-\$250.00	P2016
Yanney, James Dr.	5/18/15	-\$250.00	P2016
Yanney, James Dr.	5/19/15	\$500.00	P2016
Yanney, James Dr.	5/21/15	-\$500.00	P2016
Yanney, James Dr.	5/21/15	-\$250.00	P2016
Yanney, James Dr.	6/16/15	\$250.00	P2016
Yanney, James Dr.	6/29/15	\$250.00	P2016
Yanney, James Dr.	6/30/15	-\$250.00	P2016
Yanney, James Dr.	6/30/15	\$100.00	P2016

Contributions from Individuals with Foreign Addresses

Contributor Name	Date	Amount	Election
Packwood, Rod	5/6/15	\$50.00	P2016
Packwood, Rod	5/13/15	\$50.00	P2016
Packwood, Rod	6/19/15	\$50.00	P2016
Packwood, Rod	6/29/15	\$25.00	P2016

Excessive, Prohibited, and Impermissible Contributions**Carson America (C00573519)**

Steinke, Betty	4/16/15	\$100.00	P2016
Steinke, Betty	5/16/15	\$100.00	P2016
Steinke, Betty	6/29/15	\$100.00	P2016