



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

February 21, 2014

BRYAN GALLARDE, TREASURER  
ESPERO FOR CONGRESS  
P.O. BOX 60397  
EWA BEACH, HI 96706

**Response Due Date**  
**03/28/2014**

IDENTIFICATION NUMBER: C00547067

REFERENCE: YEAR-END REPORT (10/01/2013 - 12/31/2013)

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 2 item(s):

1. Schedules A and B of your report disclose expenditures from the candidate's personal funds on behalf of the committee. Authorized committees must disclose all expenditures from personal funds made by the candidates on behalf of their committees, just as they would disclose any other disbursements that they may make. Out-of-pocket spending by candidates, as agents of their authorized committees, requires memo entry itemization of the ultimate vendor if the aggregate amount of payments to that vendor exceeds \$200 for the election cycle. The memo entry must include the date, amount, and purpose of the out-of-pocket payments, as well as the name and address of the vendor to which payment was made. Please amend your report to include the missing information on Schedule B or indicate that memo entry itemization is not required. (2 U.S.C. §§ 434(b)(4), (5), (6)(A); 11 CFR § 104.3(b)(4); Federal Register Notice 2013-09)

2. Schedule B of your report discloses reimbursements to individuals for the following disbursements: "Reimbursement for Catering Items" and "Reimbursement for Office Supplies." 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 and clearly

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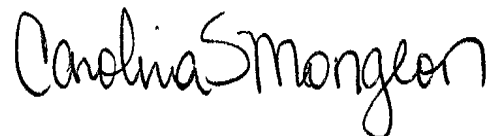
identify each memo entry supporting a reimbursement. If itemization is not necessary, you must indicate so in an amendment to this report. (11 CFR §§ 104.3(b)(4)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3)

**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) 694-1138.

Sincerely,

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

Carolina Mongeon  
Senior Campaign Finance Analyst  
Reports Analysis Division