



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

February 20, 2009

Wes Boyd, Treasurer
Moveon.Org Political Action
P.O. Box 9218
Berkeley, CA 94709

Response Due Date:
March 23, 2009

Identification Number: C00341396

Reference: Amended 30-Day Post-General Report (10/16/08-11/24/08), received
12/19/08

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 5 items:

1. Schedule A supporting Line 15 of your report discloses an offset to an operating expenditure(s) totaling \$37,428.95 from "ALASKANS FOR BEGICH," "COMMITTEE TO ELECT ALAN GRAYSON," "DARCY BURNER FOR CONGRESS," "HAGAN SENATE COMMITTEE INC," "JEANNE SHAHEEN FOR SENATE," "JEFF MERKLEY FOR OREGON," "JIM HIMES FOR CONGRESS," "MARKEY FOR CONGRESS," "MARTIN FOR SENATE INC," "MURTHA FOR CONGRESS COMMITTEE," "PERRIELLO FOR CONGRESS" and "UDALL FOR COLORADO"; however, your report(s) does not appear to disclose a disbursement to this entity. Please provide clarifying information regarding this activity and amend your report(s) if necessary.
2. Schedule B supporting Line 21(b) discloses a voided check(s) to "80/20 Consulting" for -\$15,000.00 for which it appears that an original disbursement for this total has not been reported by your committee. Please amend the report covering the period(s) during which the disbursement was made and disclose the original date of the disbursement.
3. Please clarify all expenditures made for "Catering" on Schedule B. If a portion or all of these expenditures were made on behalf of specifically

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identified federal candidates, this amount should be disclosed on Schedules B or E supporting Lines 23 or 24 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

4. Schedule B discloses an expenditure(s) for "GOTV Consulting," "List Management Services," "List Purchase," "Media Consulting," "Media Production," "Pictures," "Postage" and "Printing." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

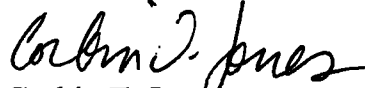
5. Schedule E of your report indicates that your committee may have failed to file one or more of the required 24 hour notices regarding "last minute" independent expenditures (see attached). A political committee must file a 24 hour report with the Federal Election Commission as specified in 11 CFR §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 notice 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 taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

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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) 694-1177.

Sincerely,



Corbin T. Jones

Senior Campaign Finance Analyst
Reports Analysis Division

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| Name of Payee | Date | Amount | Purpose | Candidate |
|-----------------------|----------|-------------|------------------|----------------|
| 80/20 Consulting | 10/17/08 | \$15,000.00 | Media Production | MCCAIN, JOHN S |
| Buying Time, LLC | 10/17/08 | \$4,444.00 | TV Advertising | MCCAIN, JOHN S |
| Fenton Communications | 10/17/08 | \$45,899.02 | TV Advertising | MCCAIN, JOHN S |
| 750 Industries | 10/17/08 | \$20,000.00 | GOTV Advertising | OBAMA, BARACK |
| Americablog | 10/17/08 | \$7,800.00 | Blog Ads | OBAMA, BARACK |
| Fine Designs | 10/17/08 | \$60,000.00 | Buttons | OBAMA, BARACK |
| Moonlight Design | 10/17/08 | \$250.00 | Web Ad design | OBAMA, BARACK |
| Google | 10/20/08 | \$29,522.30 | Web Ads | OBAMA, BARACK |
| Hotjob.com | 10/20/08 | \$5,000.00 | Web Ads | OBAMA, BARACK |

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