



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 4, 2006

John F. X. Mannion, Treasurer
Friends of Hillary
1717 K Street Northwest, Suite 309A
Washington, DC 20036

Response Due Date:
May 4, 2006

Identification Number: C00358895

Reference: Year End Report (10/1/05 - 12/31/05)

Dear Mr. Mannion:

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. **An adequate response must be received at the Senate Public Records Office by the response date noted above.** An itemization of the information needed follows:

-Schedule A of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached). You should examine all of your contributions to check for additional excessive contributions. The Committee's procedures for processing contributions should also be reviewed.

An individual or a political committee other than an authorized committee or a qualified multi-candidate committee may not make a contribution to a candidate for federal office in excess of \$2,100 per election. An authorized committee may not make a contribution 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. (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 reported, you must amend your original report with clarifying information.

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The Commission notes your request for the redesignation and/or reattribution of all of these contributions. Please be reminded that all refunds, redesignations and reattributions must be made within sixty (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 sixty (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 sixty (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))

Schedule B of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A 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))

The acceptance of excessive contributions is a serious problem. Again, the committee's procedures for processing contributions should be examined and corrected in order to avoid this problem. Although the Commission may take further legal action, prompt action by you to refund or redesignate and/or reattribute of the excessive amount will be taken into consideration.

-A review of your itemized receipts indicates a discrepancy in your aggregate election cycle-to-date totals. The reported aggregate totals on your report should include all contributions from an individual or committee given in the election cycle. Please review your procedures for compliance with this requirement and amend your report(s) as necessary. (11 CFR §104.3(a)(3))

Please note you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. 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.

A written response or an amendment to your original report(s) correcting the above problems should be filed with the Senate Public Records Office. Please contact the Senate Public Records Office at (202) 224-0322 for instructions on how and where to file an amendment. 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) 694-1168.

Sincerely,



Michelle Lee Grant
Senior Campaign Finance Analyst
Reports Analysis Division

Excessive and/or Prohibited Contributions
 Friends of Hillary (C00358895)
 Year End Report (10/1/05-12/31/05)

P = Primary Election
 G = General Election

CONTRIBUTOR NAME		DATE	AMOUNT	ELECTION
Adler	Sara	1/24/05	\$1,000.00	P2006
Adler	Sara	12/14/05	\$2,000.00	P2006
Beckwith	Robert	3/6/03	\$500.00	P2006
Beckwith	Robert	1/14/04	\$500.00	P2006
Beckwith	Robert	2/22/05	\$1,000.00	P2006
Beckwith	Robert	7/20/05	\$1,000.00	P2006
Beckwith	Robert	8/2/05	(\$1,000.00)	P2006
Beckwith	Robert	12/30/05	\$500.00	P2006
Bregman	Davis	9/30/03	\$500.00	G2006
Bregman	Davis	12/26/03	\$1,000.00	G2006
Bregman	Davis	12/10/05	\$51.00	G2006
Bregman	Davis	12/14/05	\$1,000.00	G2006
Cherry	Myron	3/24/03	\$1,000.00	P2006
Cherry	Myron M.	12/3/05	\$1,000.00	P2006
Constantinople	Anthony	12/9/05	\$3,690.00	G2006
Creel	Debbie	1/31/04	\$2,000.00	P2006
Creel	Deborah	10/29/05	\$100.00	P2006
Creel	Deborah	10/29/05	\$2,000.00	P2006
Dubin	Glenn	12/1/05	\$3,100.00	G2006
Effron	Craig W.	5/10/04	\$500.00	G2006
Effron	Craig W.	12/11/01	\$1,900.00	G2006
Epstein	Randi	9/27/05	\$2,100.00	G2006
Epstein	Randi	11/15/05	\$1,000.00	G2006
Flora	Michael	12/5/05	\$2,200.00	G2006

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CONTRIBUTOR NAME		DATE	AMOUNT	ELECTION
Galbally	Elizabeth M.	6/20/05	\$2,100.00	P2006
Galbally	Elizabeth M.	12/29/05	\$2,100.00	P2006
Gardy	Mark C.	12/7/05	\$2,900.00	G2006
Gelber	Brian	12/19/05	\$3,900.00	G2006
Huang	Sze-Jing	11/7/05	\$2,100.00	G2006
Huang	Sze-Jing	11/7/05	\$4,200.00	G2006
Jacobs	Joseph	11/25/05	\$2,400.00	G2006
Jakes	Peter	6/6/05	\$900.00	G2006
Jakes	Peter	12/6/05	\$2,500.00	G2006
Jawad	Tariq	11/4/05	\$2,200.00	G2006
Kayne	Suzanne L.	12/21/04	\$1,000.00	G2006
Kayne	Suzanne L.	12/5/05	\$2,400.00	G2006
Layton	Barbara Ann	8/6/05	\$150.00	G2006
Layton	Barbara Ann	12/13/05	\$3,000.00	G2006
Lennon	Karen	3/21/03	\$2,000.00	P2006
Lennon	Karen	11/10/05	\$210.00	P2006
Lennon	Karen	12/7/05	\$40.00	P2006
Lichtenstein	Dorothy	11/17/05	\$4,100.00	G2006
Lyons	James	1/14/04	\$500.00	P2006
Lyons	James	2/24/05	\$1,000.00	P2006
Lyons	James	10/17/05	\$1,000.00	P2006
Marcuss	Stanley J.	7/28/04	\$1,000.00	P2006

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CONTRIBUTOR NAME		DATE	AMOUNT	ELECTION
Marcuss	Stanley	12/28/05	\$1,200.00	P2006
Mattin	Helen	1/14/04	\$1,000.00	P2006
Mattin	Helen	6/23/04	\$1,000.00	P2006
Mattin	Helen	12/30/05	\$500.00	P2006
Mclroy	Hayden	11/25/03	\$1,000.00	P2006
Mclroy	Hayden	12/9/04	\$1,000.00	P2006
Mclroy	Hayden	12/29/05	\$250.00	P2006
Milstein	Edward	10/17/02	\$1,000.00	G2006
Milstein	Edward	11/29/05	\$2,900.00	G2006
Moore	William H.	4/15/05	\$300.00	G2006
Moore	William H.	12/12/05	\$2,000.00	G2006
Murphy	Arthur J.	4/15/05	\$2,100.00	P2006
Murphy	Arthur	12/3/05	\$1,000.00	P2006
O'Dwyer	Brian	8/5/04	\$1,000.00	G2006
O'Dwyer	Brian	12/2/05	\$4,100.00	G2006
Otterstein	Sven A.	3/6/03	\$200.00	P2006
Otterstein	Sven A.	9/22/03	\$200.00	P2006
Otterstein	Sven A.	2/25/04	\$250.00	P2006
Otterstein	Sven A.	3/5/04	\$250.00	P2006
Otterstein	Sven A.	3/29/04	\$250.00	P2006
Otterstein	Sven A.	4/22/04	\$200.00	P2006
Otterstein	Sven A.	5/11/04	\$200.00	P2006
Otterstein	Sven A.	8/11/04	\$250.00	P2006
Otterstein	Sven A.	9/29/04	\$100.00	P2006
Otterstein	Sven A.	12/7/05	\$350.00	P2006
Otterstein	Sven A.	12/30/05	\$500.00	P2006

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CONTRIBUTOR NAME		DATE	AMOUNT	ELECTION
Schupf	Sara	3/5/04	\$1,500.00	G2006
Schupf	Sara	5/25/05	\$400.00	G2006
Schupf	Sara	12/27/05	\$1,000.00	G2006
Smith	Richard A	12/12/05	\$2,200.00	P2006
Starr	Kenneth	4/10/05	\$900.00	G2006
Starr	Kenneth	11/29/05	\$4,000.00	G2006
Steiner	David S.	9/12/05	\$1,900.00	G2006
Steiner	David S.	12/12/05	\$2,200.00	G2006
Steiner	Sylvia L.	12/12/05	\$3,100.00	G2006
Stringer	Howard	7/8/05	\$1,000.00	P2006
Stringer	Howard	12/9/04	\$1,000.00	P2006
Stringer	Howard	12/30/05	\$2,000.00	P2006
Thypin	Marylin	4/27/04	\$2,000.00	P2006
Thypin	Marylin	12/9/05	\$500.00	P2006
Wagner	Marsha	11/15/05	\$3,100.00	G2006
Yerman	Frederick W.	6/24/04	\$1,000.00	P2006
Yerman	Frederick W.	9/8/05	\$1,000.00	P2006
Yerman	Frederick W.	12/5/05	\$1,100.00	P2006
Yerman	Frederick W.	12/5/05	\$2,100.00	G2006
Yerman	Frederick W.	12/13/05	\$100.00	G2006

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