

RQ-2

January 26, 2015

JAMES S. GRIEN, TREASURER NUNN FOR SENATE INC PO BOX 78936 ATLANTA, GA 30357

Response Due Date 03/02/2015

IDENTIFICATION NUMBER: C00547414

REFERENCE: 30 DAY POST-GENERAL REPORT (10/16/2014 - 11/24/2014)

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. An adequate response must be received at the Senate Public Records Office by the response date noted above. 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 item(s):

- 1. Column B figures for the Summary and Post-Election Detailed Summary Page information should equal the sum of the Column B figures on your previous report and the Column A figures on this report minus the Column C figures. Please file an amendment to your report to correct the Column B discrepancies for Line(s) 6(a), 6(b), 6(c), 7(a), 7(b), 7(c), 11(a)(iii), 11(e), 16, 17, 22, and all subsequent report(s) that may be affected by this correction. Note that Column B should reflect only the election cycle-to-date totals (11/5/08 through 11/4/14). (52 U.S.C. § 30104(b) (formerly 2 U.S.C. § 434(b)) and 11 CFR § 104.3)
- 2. Schedule A supporting Line 12 of the Detailed Summary Page(s) of your combined 2014 reports discloses transfer(s) totaling \$12,526.97 from the Georgia New Hampshire Victory Fund, which is a joint fundraising committee affiliated with your committee. The sum of memo Schedule A is less than the total amount transferred. Please note that the sum of memo Schedule A supporting a transfer(s) from a joint fundraising committee should be greater than or equal to the amount of the transfer(s).

Each participating committee shall report its share for net proceeds received from the joint fundraising committee as a transfer-in on Schedule A. A memo Schedule A must be provided to itemize your committee's share of the gross

NUNN FOR SENATE INC

Page 2 of 3

contributions received through the joint fundraiser. The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the election cycle and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount. (11 CFR § 102.17(c)(8)(i)(B)) Please amend your report to include the missing Schedule A or provide an explanation for this apparent discrepancy.

3. Schedule A of your report indicates that your committee may have failed to file one or more of the required 48-hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-General Report (see attached). A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. The failure to file 48-hour notices may result in civil money penalties or legal enforcement action. (11 CFR § 104.5(f))

If any contribution of \$1,000 or more was incorrectly reported, you must amend your original report with the clarifying information. For each contribution received by a joint fundraising representative and subsequently transferred to your committee, please ensure that your report discloses the <u>original</u> date of receipt of the contribution by the joint fundraising representative in a memo entry supporting the transfer. The entry for the transfer itself should show the date the contribution was transferred to your committee by the joint fundraising representative.

- **4.** Your committee filed 48-hour notices reporting the following "last minute" contributions (see attached). However, these contributions do not appear on Schedule A of this report. Please amend your report to include these contributions or provide an explanation of these apparent discrepancies. (11 CFR § 104.3(a)(4)(i))
- **5.** Your committee filed 48-hour notices disclosing "last minute" contributions (see attached). However, only partial amounts of these contributions have been disclosed on Schedule A of this report. Please amend your report to include the entire amounts of these contributions or provide an explanation of the apparent discrepancies. (11 CFR § 104.3(a)(4)(i)) For each contribution received by a

NUNN FOR SENATE INC

Page 3 of 3

joint fundraising representative and subsequently transferred to your committee, please ensure that your report discloses the <u>original</u> date of receipt of the contribution by the joint fundraising representative in a memo entry supporting the transfer. The entry for the transfer itself should show the date the contribution was transferred to your committee by the joint fundraising representative.

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.

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) 694-1395.

Sincerely,

Ben Holly

Senior Campaign Finance Analyst

Baywin G. Holly

Reports Analysis Division

Missing 48-Hour Notices Nunn for Senate, Inc. (C00547414)

Contributor Name	Date	Amount	Election
SMITH, FREDA	10/20/14	\$1,000.00	G2014
SIMONS, RICHARD	10/22/14	\$1,000.00	G2014
WHITTEN, KENNETH W	10/22/14	\$1,000.00	G2014
IRVANI, BAHMAN	10/23/14	\$2,600.00	G2014
MARTIN, ERIC	10/27/14	\$2,300.00	G2014
MONTAGUE, JOHN	10/29/14	\$1,000.00	G2014
FELDMAN, DIANE	10/30/14	\$1,000.00	G2014
FELDMAN, MOSES	10/30/14	\$1,000.00	G2014

Incorrectly Reported Receipts on 48-Hour Notices Nunn for Senate, Inc. (C00547414)

48 Hour Notices Filed/Contributions Not Disclosed on Schedule A

Contributor Name	Date	Amount
DIAZ-VERSON, SALVADOR	10/27/14	\$1,000.00
HAWK, JON	10/20/14	\$1,000.00
KOVAR, PETER	10/20/14	\$1,000.00
LEGRAND, ETIENNE R.	10/27/14	\$1,000.00
RAIZEN, ABRAHAM	10/27/14	\$1,000.00
SHAPIRO, CARL	11/1/14	\$1,000.00
WEGMAN, DAVID	10/20/14	\$1,000.00

48 Hour Notices Filed/Only Partial Contributions Disclosed on Schedule A

Contributor Name	Date	Amount
ASHE, LAWRENCE	10/28/14	\$3,000.00
COOPER, LAWRENCE	10/28/14	\$2,000.00
DRANKOSKI, BERNADETTE	10/23/14	\$2,600.00
FAHEY, JANE	10/27/14	\$1,000.00
LOVELAND, JOE JOSEPH	10/21/14	\$1,000.00
WIELAND, JOHN JR.	10/27/14	\$2,500.00