



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

November 26, 2012

ADAM GREEN, TREASURER  
PROGRESSIVE CHANGE CAMPAIGN  
COMMITTEE  
1630 R STREET NW #703  
WASHINGTON, DC 20009

**Response Due Date**  
**12/31/2012**

IDENTIFICATION NUMBER: C00458000

REFERENCE: AMENDED YEAR-END REPORT (07/01/2011 - 12/31/2011), RECEIVED  
04/15/2012

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 6 item(s):

1. Your Amended Year-End Report (11/23/10 - 12/31/10), received 8/1/11, and Amended Year-End Report (7/1/11 - 12/31/11), received 4/15/12, disclose a substantial increase in certain categories of receipts from the amounts disclosed on your original reports (see attached). Please amend your reports or provide an explanation to clarify why this additional activity was not provided with your original reports. (11 CFR § 104.3)
2. Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §§110.1(d) and 110.2(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

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

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each

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person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

**3.** Your report discloses \$68,712.23 from "PCCC Recall Committee (Wisconsin)," "PCCC Recall Fund (Wisconsin IE)," and "Shaunna Thomas" in Offsets to Operating Expenditures on Line 15 of the Detailed Summary Page. Please be advised that if there are not corresponding expenditures for these entries, it may constitute an excessive or prohibited contribution. Please amend your report or provide an explanation for this apparent discrepancy. (2 U.S.C 434(b) & 11 CFR § 104.3(a) and (b))

**4.** Schedule A supporting Line 16 discloses refunds of contributions made to "Bill Hedrick for Congress" and "Emily Sirota for Denver School Board." However, it appears that these contributions were not previously reported by your committee. Please amend the appropriate reports(s) to disclose the original contributions or provide clarifying information. (2 U.S.C. § 434(b) and 11 CFR § 104.3(a) & (b))

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**5.** Schedule A of your report discloses a receipt of \$10,000 from the "PCCC Non-Federal Account." Please clarify whether this transfer is from an account maintained by your committee for non-federal activity. If so, be advised that such a transfer is prohibited by 11 CFR §102.5(a)(1)(i) and the full amount of the transfer should be returned to the non-federal account. Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on Schedule B supporting Line 22 of your next report.

If this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the impermissible funds or clarification of the transaction, will be taken into consideration. (2 U.S.C. §441b(a) & 11 CFR §103.3(b)(1) and (2))

**6.** Schedule B supporting Lines 21(b) and 23 disclose disbursements to "Petty Cash" for "Per Diem," "Per diem," "Rent Stipend," and "Technology Stipend." Please be advised that cash disbursements to any person or vendor for any single purchase or transaction may not exceed \$100. If payments to the original vendor exceed \$200 in a calendar year, a memo entry including the name of the original vendor as well as address, date, amount, and purpose of the original purchase must be provided. Please amend your report to include the missing information or provide clarifying information if memo items are not required. (2 U.S.C. § 432(h)(2) and 11 CFR § 102.11)

- Schedule B of your report discloses expenditures for "Advertising." For your information and consideration when preparing future filings, 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 would be 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 would be reported on Schedule B for Line 21(b) of the Detailed Summary Page.

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**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) 694-1162.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Butler', with a stylized flourish at the end.

David Butler  
Senior Campaign Finance Analyst  
Reports Analysis Division

**Increase in Activity on Amended Reports and Excessive Contributions  
Progressive Change Campaign Committee (C00458000)**

*Overview of Additional Receipts*

<b>Report Name</b>	<b>Total Additional Receipts</b>	<b>Line Number(s)</b>
2010 Year-End/Amended 2010 Year-End, received 8/1/11	\$15,321.15	11(a)(ii)
2011 Year-End/Amended 2011 Year-End, received 4/15/12	\$36,915.17	15 and 17
<b>Total Additional Receipts</b>	<b>\$52,236.32</b>	

**Total Increase in Activity on Amended Reports: \$52,236.32**

*Excessive Contributions from an Individual*

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Report</b>
Stanley Eskin	1/21/11	\$100.00	2011 Mid-Year
Stanley Eskin	3/29/11	\$250.00	2011 Mid-Year
Stanley Eskin	4/1/11	\$500.00	2011 Mid-Year
Stanley Eskin	4/9/11	\$500.00	2011 Mid-Year
Stanley Eskin	4/12/11	\$200.00	2011 Mid-Year
Stanley Eskin	6/9/11	\$500.00	2011 Mid-Year
Stanley Eskin	6/14/11	\$500.00	2011 Mid-Year
Stanley Eskin	6/23/11	\$500.00	2011 Mid-Year
Stanley Eskin	7/11/11	\$1,000.00	2011 Year-End
Stanley Eskin	7/15/11	\$500.00	2011 Year-End
Stanley Eskin	8/24/11	\$1,000.00	2011 Year-End
Stanley Eskin	9/14/11	\$500.00	2011 Year-End
Stanley Eskin	9/27/11	\$37.50	2011 Year-End
Stanley Eskin	10/21/11	\$2,000.00	2011 Year-End
Stanley Eskin	11/10/11	\$1,000.00	2011 Year-End
Stanley Eskin	11/23/11	\$200.00	2011 Year-End
Stanley Eskin	12/4/11	\$50.00	2011 Year-End
Stanley Eskin	12/12/11	\$1,000.00	2011 Year-End
Stanley Eskin	12/14/11	\$25.00	2011 Year-End
Stanley Eskin	12/26/11	\$750.00	2011 Year-End