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October 13, 2015

REBECCA NEWMAN, TREASURER EVERPOWER WIND HOLDING INC PAC 1251 WATERFRONT PLACE 3RD FLOOR PITTSBURGH, PA 15222

Response Due Date 11/17/2015

IDENTIFICATION NUMBER: C00490904

REFERENCE: MID-YEAR REPORT (01/01/2015 - 06/30/2015)

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. Your filings disclose that your committee may have satisfied the criteria for becoming a multicandidate committee; however, the Commission has no record 1M (Notification of Multicandidate Status) filed by your of a FORM Please be advised that once a political committee meets the committee. certification requirements of 11 CFR §100.5(e)(3) or becomes affiliated with an existing multicandidate committee, whether or not that political committee has certified its status as a multicandidate committee, it automatically attains multicandidate status and must file a **FORM** 1M (Notification Multicandidate Status) within ten (10) calendar days. (11 CFR §102.2 (a)(3))

For further guidance on multicandidate status by affiliation, see 11 CFR §110.2(a)(1). Please submit a FORM 1M to disclose the required information for the public record. A copy of FEC FORM 1M can be downloaded from the FEC website at http://www.fec.gov, or requested through the FEC Fax line at (202) 501-3413.

- 2. Line 7, Columns A and B of the Summary Page do not equal Line 31, Columns A and B of the Detailed Summary Page. Please amend your report to correct this discrepancy. (11 CFR § 104.3(c))
- For your information and consideration when preparing future filings, Schedule A supporting Line 11(a)(i) of your report discloses contributions

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received through what appears to be a payroll deduction plan. Be advised that payroll deductions should also include the frequency of the deduction and the amount deducted per pay period. (11 CFR §104.8(b). Please refer to the enclosed sample of properly reported payroll deductions.

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) 694-1175.

Sincerely,

Sarah guris

Sarah Juris Senior Campaign Finance Analyst Reports Analysis Division

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| Payroll Deducti | ions | |
|--|-----------------------------------|---|
| SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS Any information copied from such Reports and Statements nor for commercial purposes, other than using the name and | | |
| NAME OF COMMITTEE (In Full) Critical Reason Inc. PAC Full Name (Last, First, Middle Initial) A. Kant, Immanuel Mailing Address 3 Critiques Ave. City City Konigsburg VA FEC ID number of contributing | Zip Code 33333 | Date of Receipt payroll deduction Amount of Each Receipt this Period |
| Name of Employer Occupation Critical Reason Inc. Bra | and Manager e Year-to-Date 285.00 | (\$15.00 biweekly)** |
| *Adding Extra Text/Explanation: When using FECFile electronic filing software, this information can be entered using the "memo text" window. To make a memo text entry, select the "view" menu on the FECFile toolbar. Select "All Transactions." Single click (highlight) the transaction to which the memo text will be attached. Then select the "Edit" menu on the toolbar and select "memo text." | | |
| **When using FECFile electronic filing software, enter this information in the "description" field. | | |

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See the illustration above.)

In-Kind Contributions

When determining whether to itemize an *in-kind* contribution received, follow the same guidelines listed above under "When to Itemize Receipts." See page 9 for information on how to determine the dollar value of an *in-kind* contribution.

In addition, add the value of the *in-kind contribution* to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the *in-kind contribution* must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration on page 56.

Appreciated Goods

When a committee receives an in-kind contribution whose value may appreciate over time, such as stock or artwork, special reporting rules apply:

- Itemize the initial gift, if necessary, as a memo entry on Schedule A (see "When to Itemize Receipts," on page 53). Under "Amount," report the fair market value of the contribution on the date the item was received. Do not include that amount in the total for Line II(a)(i) on the Detailed Summary Page.
- Once the item is sold, report the sale price as a contribution on Line II(a)(i) if the purchaser is known or as an "other receipt" on Line I5 if the purchaser is unknown.

Itemize the transaction on Schedule A if necessary. 104.13(b). See also AO 1989–6.

Joint Contributions

A joint contribution is made by a single check that bears two signatures. A check with one signature may also be a joint contribution if an accompanying form or letter, signed by both contributors, instructs the committee to treat it as a joint contribution. (A check drawn on a joint bank account but signed by only one person does not qualify as a joint contribution. Attribute the full amount of such a check only to the person who signed it. Alternatively, a reattribution may be sought using the procedures described below.)

For the purposes of itemization, report a *joint* contribution as though the joint contributors had given separately.

A joint contribution is itemized in items A and B in the illustration on page 57. In this case, the committee received a \$1,000 check from a married couple, signed by both spouses. Because there were no

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