



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 27, 2014

KATHRYN KAY, TREASURER
MONTANANS FOR LIMITED GOVERNMENT
PO BOX 1154
LOLO, MT 59847

Response Due Date
07/01/2014

IDENTIFICATION NUMBER: C00563155

REFERENCE: 48-HOUR NOTIFICATION REPORT, RECEIVED 05/14/2014

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. **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 committee filed a 48 Hour Report (see attached) informing the Commission of independent expenditures made in support or opposition of federal candidates. Please be advised that itemized independent expenditures disclosed on 24 and 48 Hour Reports should disclose the following information: the name and mailing address of the payee, the purpose of the expenditure, the date the communication is publicly disseminated or distributed, the amount, the name and office sought, state and district (if applicable) of the federal candidate, the calendar year-to-date, per election, for office sought total, the election designation, an indication of whether the candidate was supported or opposed and the signature of the treasurer. Please provide a complete amended 48 Hour Report and provide the calendar year-to-date, per election, for office sought total and the signature of the treasurer. (11 CFR §104.4(b) and (c))

2. Your committee filed a 48 Hour Report of independent expenditures made but disclosed multiple federal candidates within a single entry. Please be advised that itemized independent expenditures disclosed on 24 and 48 Hour Reports should refer to only one candidate per entry. The cost of independent expenditures made referencing more than one candidate should be allocated among the candidates in proportion to the benefit each is expected to receive (see attached). This will better clarify the year-to-date spent per office sought for a particular election. Please amend your report to separate the portion of

MONTANANS FOR LIMITED GOVERNMENT

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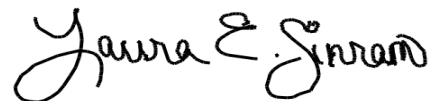
costs attributable to each candidate and provide the correct year-to-date total(s) on Schedule E. (2 U.S.C. § 434(b)(4) and 11 CFR §104.4(f))

- For your information and consideration when preparing future 24 and 48 Hour Reports of Independent Expenditures, please note that your committee need only file the Schedule E pages on which you have itemized independent expenditures. The Summary and Detailed Summary Pages only need to be filed with your regularly filed quarterly reports. For your next 24 or 48 Hour Report filing, please refer to the attached instructions.

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) 694-1157.

Sincerely,



Laura Sinram
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

**SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES**

PAGE OF
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) Montanans for Limited Government		FEC IDENTIFICATION NUMBER C Applied for	
Check if <input type="checkbox"/> 24-hour report	<input checked="" type="checkbox"/> 48-hour report	<input checked="" type="checkbox"/> New report	<input type="checkbox"/> Amends report filed on

Full Name of Payee Bee Broadcasting		Date of Public Distribution/Dissemination 05 / 13 / 2014	
Mailing Address P.O. Box 5409		Amount 4050.00	
City Kalispell	State MT	Zip Code 59903	Date of Disbursement or Obligation 05 / 12 / 2014
Purpose of Expenditure Radio Advertising		Category/Type 004	
Name of Federal Candidate Champ Edmunds, Matt Rosendale		<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President <input type="checkbox"/> State
Calendar Year-To-Date Per Election for Office Sought		Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	

Full Name of Payee Town Square Media		Date of Public Distribution/Dissemination 05 / 20 / 2014	
Mailing Address 3250 S. Reserve		Amount 5900.00	
City Missoula	State MT	Zip Code 59801	Date of Disbursement or Obligation 06 / 12 / 2014
Purpose of Expenditure Radio Advertising		Category/Type 004	
Name of Federal Candidate Champ Edmunds, Matt Rosendale		<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President <input type="checkbox"/> State
Calendar Year-To-Date Per Election for Office Sought		Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	

(a) SUBTOTAL of Itemized Independent Expenditures.....	9950.00
(b) SUBTOTAL of Unitemized Independent Expenditures.....	
(c) TOTAL Independent Expenditures.....	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Signature

Date

____ / ____ / ____

14031240022

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

PAGE OF
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) Montanans for Limited Government	FEC IDENTIFICATION NUMBER Applied for
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Check if 24-hour report 48-hour report New report Amends report filed on

Full Name of Payee
Pete DeBeault

Date of Public Distribution/Dissemination
[] / [] / []

Mailing Address
147 New Meadows Dr.

Amount
350.00

City State Zip Code
Missoula MT 59808

Date of Disbursement or Obligation
05 / 13 / 2014

Purpose of Expenditure
Consulting for Radio Ads

Category/Type
0.04

Name of Federal Candidate
Champ Edmunds, Matt Rosendale

Office Sought: House Senate
 President District: _____ State: _____

Calendar Year-To-Date Per Election for Office Sought
[]

Disbursement For: Primary General
 Other (specify) ▶

Full Name of Payee
Brad Molnar, BSM Communications

Date of Public Distribution/Dissemination
[] / [] / []

Mailing Address
Box 517

Amount
350.00

City State Zip Code
Laurel MT 59044

Date of Disbursement or Obligation
05 / 13 / 2014

Purpose of Expenditure
Prep of advertising

Category/Type
0.04

Name of Federal Candidate
Champ Edmunds

Office Sought: House Senate
 President District: _____ State: _____

Calendar Year-To-Date Per Election for Office Sought
[]

Disbursement For: Primary General
 Other (specify) ▶

(a) SUBTOTAL of Itemized Independent Expenditures.....▶	7,000.00
(b) SUBTOTAL of Unitemized Independent Expenditures.....▶	[]
(c) TOTAL Independent Expenditures.....▶	[]

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Signature _____ Date [] / [] / []

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14031240023

SCHEDULE E (FEC Form 3X) ITEMIZED INDEPENDENT EXPENDITURES

PAGE OF FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) **Montanans For Limited Government** FEC IDENTIFICATION NUMBER **C**

Check if 24-hour report 48-hour report New report Amends report filed on

Full Name of Payee: **Kenneth Kay** Date of Public Distribution/Dissemination: **05/13/2014**

Mailing Address: **P.O. Box 1209** Amount: **1,000.00**

City: **Lolo** State: **MT** Zip Code: **59847** Date of Disbursement or Obligation: **05/13/2014**

Purpose of Expenditure: **Long distance telephone charges, copies, office supplies** Category/Type: **001**

Name of Federal Candidate: **Champ Edmunds, Matt Rosendale** Support Oppose Office Sought: House Senate District: _____ State: _____

Calendar Year-To-Date Per Election for Office Sought: _____ Disbursement For: Primary General Other (specify) _____

Full Name of Payee: _____ Date of Public Distribution/Dissemination: _____

Mailing Address: _____ Amount: _____

City: _____ State: _____ Zip Code: _____ Date of Disbursement or Obligation: _____

Purpose of Expenditure: _____ Category/Type: _____

Name of Federal Candidate: _____ Support Oppose Office Sought: House Senate District: _____ State: _____

Calendar Year-To-Date Per Election for Office Sought: _____ Disbursement For: Primary General Other (specify) _____

(a) SUBTOTAL of Itemized Independent Expenditures..... **1,000.00**

(b) SUBTOTAL of Unitemized Independent Expenditures.....

(c) TOTAL Independent Expenditures..... **1,075.00**

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Kathryn Kay Date **05/14/2014**

Signature

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14031240024

Campaign Guide for Nonconnected Committees

7. Independent Expenditures

Schedule E

Itemize any independent expenditure which, by itself or when added to other independent expenditures made to the same payee during the same calendar year, exceeds \$200. The date that a communication is publicly disseminated serves as the date that a committee must use to determine whether the total amount of independent expenditures has, in the aggregate, reached or exceeded the threshold reporting amount of \$200.

Independent expenditures are itemized on Schedule E. A subtotal for itemized independent expenditures is entered on Line (a). Independent expenditures made (i.e., publicly disseminated) prior to payment should be disclosed as memo entries on Schedule E and on Schedule D as a reportable debt under 104.11.

Independent expenditures of \$200 or less do not need to be itemized, though the committee must report the total of those expenditures on Line (b). 104.3(b)(3)(vii)(C) and 104.4(a).

Enter the total of itemized and unitemized independent expenditures on Line (c) of Schedule E and on Line 24 of the Detailed Summary Page.

48-Hour Independent Expenditure Reports

Political committees and other persons who make independent expenditures at any time during a calendar year—up to and including the 20th day before an election—must disclose this activity within 48 hours each time that the expenditures aggregate \$10,000 or more. This reporting requirement is in addition to the requirement to file 24-hour reports of independent expenditures each time that disbursements for independent expenditures aggregate to or above \$1,000 during the last 20 days—up to 24-hours—before an election. 2 U.S.C. §§434(b), (d) and (g). For information on such last-minute independent expenditure reports, see below.

Note: expenditures that have already been disclosed in a previous report do not have to be included on the 48-hour report.

The committee must report a last-minute expenditure a second time on a Schedule E filed with its next regular report. 104.4(a).

Electronic filers must file these reports electronically. Paper filers may file by fax or email. Additionally, electronic filers and paper filers may file 48-hour reports using the FEC web site's online program. 104.4(b)(2), 109.10(c) and 100.19(d)(3).

Independent expenditures aggregating less than \$10,000.

Committees must report on Schedule E, as part of their regularly scheduled filing, independent expenditures that aggregate less than \$10,000 with respect to a given election during the calendar year that are made up to and including the 20th day before an election. 104.4(a) and (b)(1).

Independent expenditures aggregating \$10,000 and above.

Once an individual's or committee's independent expenditures in connection with a given election reach or exceed \$10,000 in the aggregate at any time up to and including the 20th day before an election, they must be reported within 48 hours of the date that the expenditure is publicly distributed. All 48-hour reports must be filed with and received by the Commission at the end of the second day after the independent expenditure is publicly distributed.

Aggregating independent expenditures for reporting purposes.

Independent expenditures are aggregated toward the various reporting thresholds on a per-election and per-office sought basis within the calendar year. Consider, as examples, the following scenarios, all of which occur outside of the 20-day window before an election when 24-hour reports are required:

- If a committee makes \$5,000 in independent expenditures with respect to a Senate candidate, and \$5,000 in independent expenditures with respect to a House candidate, then the committee is not required to file 48-hour

Completing FEC Form 3X

INDEPENDENT EXPENDITURES (SCHEDULE E)

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

PAGE 1 OF 1
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full)
Civil Republic PAC

FEC IDENTIFICATION NUMBER
C 00000001

Check if 24-hour notice 48-hour notice

Full Name (Last, First, Middle Initial) of Payee
Athens Sentinel

Date
09 / 09 / 2008

Mailing Address
301 Peach Street

Amount
2535.69

City State Zip Code
City ST 00000

Purpose of Expenditure
Newspaper Ad

Category/Type
004

Office Sought: House State: ST
 Senate District: 03
 President

Name of Federal Candidate Supported or Opposed by Expenditure:
Ginnie Mannon

Check One: Support Oppose

Calendar Year-To-Date Per Election for Office Sought
3585.69

Disbursement For: Primary General
 Other (specify)

Full Name (Last, First, Middle Initial) of Payee
Laughing Man Communications

Date
09 / 23 / 2008

Mailing Address
101 Keystone Ave.

Amount
10555.00

City State Zip Code
City ST 00000

Purpose of Expenditure
Billboards

Category/Type
004

Office Sought: House State: ST
 Senate District: 13
 President

Name of Federal Candidate Supported or Opposed by Expenditure:
John Gedsudski

Check One: Support Oppose

Calendar Year-To-Date Per Election for Office Sought
15810.00

Disbursement For: Primary General
 Other (specify)

(a) SUBTOTAL of Itemized Independent Expenditures 13090.69

(b) SUBTOTAL of Unitemized Independent Expenditures 0.00

(c) TOTAL Independent Expenditures 13090.69

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Seymour Glass
Signature

Date
10 / 10 / 2008

tion, then the committee must file a 48-hour report.

The date that a communication is publicly disseminated serves as the date that a committee must use to determine whether the total amount of independent expenditures has, in the aggregate, reached or exceeded the threshold reporting amount of \$10,000. Independent expenditures publicly disseminated prior to payment must be disclosed as memo entries on Schedule E and on Schedule D as a reportable debt under 104.11. A 48-hour report is required for each additional \$10,000 in aggregate expenditures.

The calculation of the aggregate amount of the independent expenditures must include both disbursements for independent expenditures and all contracts obliging funds for disbursements of independent expenditures. 11 CFR 104.4(f). Expenditures that have already been disclosed in a previous report do not have to be included on the 48-hour report.

Last-Minute Independent Expenditure Reports (24 Hour Notices)

Any independent expenditures aggregating \$1,000 or more and made after the 20th day but more than 24 hours before the day of an election must be reported and the report must be received within 24 hours after the expenditure is made. A 24-hour report is required for each additional \$1,000 that aggregates. The 24-hour report must be filed on a Schedule E. 104.4(c) and 104.5(g). The date that a communication is publicly disseminated serves as the date that a committee must use to determine whether the total amount of independent expendi-

reports, but must disclose this activity on its next regularly scheduled report.

- If the committee makes \$5,000 in independent expenditures with respect to a clearly identified candidate in the primary, and an additional \$5,000 in independent expenditures with respect to the same candidate in the general, then again no 48-hour report is required and the expenditures are disclosed on the committee's next report.
- If the committee makes \$6,000 in independent expenditures supporting a Senate candidate in the primary election and \$4,000 opposing that Senate candidate's opponent in the same elec-

Campaign Guide for Nonconnected Committees

tures has, in the aggregate, reached or exceeded the threshold reporting amount of \$1,000.

The committee must report a last-minute expenditure a second time on a Schedule E filed with its next regular report. 104.4(a).

Electronic filers must file these reports electronically, and paper filers may file by fax or email. Additionally, electronic filers and paper filers may file 24-hour reports using the FEC web site's online program. 11 CFR 104.4(c) and 109.10(d).

Certification

All 24- and 48-hour reports must contain, among other things, a verification under penalty of perjury as to whether the expenditure was made in cooperation, consultation or concert with a candidate, a candidate's committee, a political party committee or an agent of any of these. 11 CFR 104.4(d)(1) and 109.10(e)(1)(v).

For reports filed on paper, the treasurer must sign the Schedule E. For reports filed by email, the treasurer must type his or her name on the Schedule E following the certification.

8. Reporting Loans

Continuously itemize all loans received and made by the committee until they are repaid. All repayments made or received on a loan must also be itemized. 104.3(a)(4)(iv); 104.3(b)(3)(iii) and (vi); 104.3(d); 104.11. Procedures for reporting loans and loan repayments are explained below.

Reminder: Loans are considered contributions to the extent of the outstanding balance of the loan. Loans from banks, however, are not considered contributions if made in the ordinary course of business. Endorsements and guarantees of bank loans, however, do count as contributions. 100.52(b).

Loans Received by the Committee

Schedule A: Initial Receipt of Loan

Itemize the receipt of a loan, regardless of amount, on a separate Schedule A for Line 13 ("Loans Received").

Schedule B: Interest and Principal Payments

Report the interest paid on a loan as an operating expenditure, itemizing the payment on a Schedule B for Line 21(b) ("Operating Expenditures") once interest payments to the payee aggregate over \$200 in a calendar year. 100.111(b) and 104.3(b)(3)(i).

Payments to reduce the principal must be itemized, regardless of amount, on a separate Schedule B for Line 26 ("Loan Repayments Made"). 104.3(b)(3)(iii).

Schedule C: Continuous Reporting

In addition, report both the original loan and payments made to repay the loan on Schedule C each reporting period until the loan is fully repaid. 104.3(d) and 104.11. Instructions for Schedule C explain what information must be disclosed. Use separate Schedule C forms to itemize loans received and loans made.

The Schedule C balance of the total amount owed on loans is entered on Line 10 of the Summary Page ("Debts and Obligations Owed by the Committee") or, if the committee has other debts, the balance is carried over to Schedule D (see page 76).