



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 11, 2013

BROGHAMER, KEVIN, TREASURER
REINVENTING A NEW DIRECTION -
RANDPAC
PO BOX 72598
NEWPORT, KY 41072

Response Due Date
04/15/2013

IDENTIFICATION NUMBER: C00493924

REFERENCE: AMENDED 12 DAY PRE-GENERAL REPORT (10/01/2012 -
10/17/2012), RECEIVED 01/31/2013

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 2 item(s):

1. Schedule E of your report indicates that your committee may have failed to timely file one or more of the required 48 hour report(s) for independent expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more with respect to a given election, made any time during the calendar year up to and including the 20th day before an election. The report must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. (11 CFR §104.3(b))

2. Schedule D supporting Line 10 of your report discloses debts incurred this period totaling \$1,500.00 owed to "Saber Communications, Inc." for apparent independent expenditures. However, a MEMO Schedule E has not been provided. Please be advised that if a communication is aired in one reporting

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period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated or distributed, and on a Schedule D if it is a reportable debt under 11 CFR §104.11. Subsequently, when the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable. Please amend your report to clarify this apparent discrepancy or provide clarifying information regarding the nature of this debt. (11 CFR §104.4)

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) 694-1133.

Sincerely,



Christopher Morse
Senior Campaign Finance Analyst
Reports Analysis Division

Late 48 Hour Report (Schedule E)
Reinventing A New Direction - RANDPAC (C00493924)

Name of Payee	Date	Amount	Candidate	Election	Report Received
Strategic Media Placement, Inc.	10/5/12	\$75,000.00	Joe Manchin III	G2012	10/9/12
Strategic Media Placement, Inc.	10/5/12	\$125,000.00	Bill Nelson	G2012	10/9/12