



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

October 5, 2014

JEROME F. O'NEILL, TREASURER  
GREEN MOUNTAIN PAC  
PO BOX 1142  
MONTPELIER, VT 05601

**Response Due Date**  
**11/10/2014**

IDENTIFICATION NUMBER: C00409110

REFERENCE: JULY QUARTERLY REPORT (04/01/2014 - 06/30/2014)

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 3 item(s):

1. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "admin retainer," "political retainer," and "retainer." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at [http://www.fec.gov/law/policy/purposeofdisbursement/inadequate\\_purpose\\_list\\_3507.pdf](http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf).

2. Schedule B supporting Line 23 discloses one or more contributions to a candidate(s) for the 2014 Primary election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. (11 CFR §§110.1(b)(3) and 110.2(b)(3))

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement,"

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along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund. (11 CFR §103.3(b) (1) and (3))

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

**3.** Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. Please be advised that 52 U.S.C. §30116(a) (formerly 2 U.S.C. §441a(a)) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

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

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

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Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration. (11 CFR §103.3(b)(1) and (3))

- For your information and consideration when preparing future filings, Schedule B supporting Line 23 of your report discloses contributions to federal candidates for which multiple election designations have been provided. Commission regulations encourage committees making contributions to federal candidates to designate their contributions in writing for a particular election. Contributions not designated for a particular election will be attributed to the next election for Federal office in which the candidate is participating. (11 CFR §§ 110.1(b)(2) and 110.2(b)(2)) For future filings, please include only one election designation for each contribution, if applicable.

**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.

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Sincerely,

A handwritten signature in black ink, appearing to read "D. Butler", written in a cursive style.

David Butler  
Senior Campaign Finance Analyst  
Reports Analysis Division

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**Excessive, Prohibited, and Impermissible Contributions  
Green Mountain PAC (C00409110)**

**Contributions Made After Election Date**

<b>Recipient Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>	<b>Election (State-Date)</b>
Alison for Kentucky	6/23/14	\$5,000.00	P2014	KY-5/20/14
Braley for Iowa	6/23/14	\$5,000.00	P2014	IA-6/3/14
Natalie Tennant for Senate	6/23/14	\$5,000.00	P2014	WV-5/13/14
Walsh for Montana	6/23/14	\$2,500.00	P2014	MT-6/3/14

**Excessive Contributions to a Committee/Candidate Committee**

<b>Recipient Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>	<b>Report</b>
Alison for Kentucky	3/24/14	\$2,500.00	P2014	2014 April Quarterly
Alison for Kentucky	5/19/14	\$2,500.00	P2014	2014 July Quarterly
Alison for Kentucky	6/23/14	\$5,000.00	P2014	2014 July Quarterly
Braley for Iowa	12/22/13	\$2,500.00	P2014	2013 Year-End
Braley for Iowa	3/24/14	\$2,500.00	P2014	2014 April Quarterly
Braley for Iowa	6/23/14	\$5,000.00	P2014	2014 July Quarterly
Natalie Tennant for Senate	12/22/13	\$2,500.00	P2014	2013 Year-End
Natalie Tennant for Senate	3/24/14	\$2,500.00	P2014	2014 April Quarterly
Natalie Tennant for Senate	6/23/14	\$5,000.00	P2014	2014 July Quarterly
Peters for Michigan	9/26/13	\$2,500.00	P2014	2013 Year-End
Peters for Michigan	12/22/13	\$2,500.00	P2014	2013 Year-End
Peters for Michigan	6/23/14	\$2,500.00	P2014	2014 July Quarterly
Walsh for Montana	12/22/13	\$5,000.00	P2014	2013 Year-End
Walsh for Montana	6/23/14	\$2,500.00	P2014	2014 July Quarterly