

RQ-2

February 6, 2013

JAMES M. SMITH, TREASURER
STATE OF HAWAII ORGANIZATION OF POLICE
OFFICERS (SHOPO POLITICAL ACTION
FUND)
1717 HOE STREET
HONOLULU, HI 96819

Response Due Date 03/13/2013

IDENTIFICATION NUMBER: C00510974

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2012 - 09/30/2012)

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 3 item(s):

- 1. Schedule A of your report discloses aggregate year-to-date totals for contributions received from individuals which appear to be incorrect. Please be advised that federal regulations require aggregate year-to-date totals to include only those contributions which are received during the calendar year. In the event that the aggregate year-to-date total is correct, please note that federal regulations also require the disclosure of all contributions received from individuals who have contributed over \$200. (11 CFR §104.3(a)(4)) Please amend your report to provide the correct aggregate year-to-date totals.
- 2. Schedule A supporting Line 11(a)(i) of your report discloses receipts identified as "Dues Shopo." Please be advised that federal regulations require the itemization of all contributions from individuals/persons that aggregate greater than \$200 in the calendar year. Contributions from individuals/persons that aggregate \$200 or less need only be disclosed on Line 11(a)(ii) of the Detailed Summary Page.

Please clarify whether the receipts disclosed on Schedule A includes any contributions that aggregate greater than \$200 from an individual/person in the calendar year. If this is the case, please amend your report by itemizing the contributions from each individual/person on Schedule A. (11 CFR §104.3(a) (2))

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3. Schedule E of your report indicates that your committee may have failed to file one or more of the required 24 hour report(s) regarding "last minute" independent expenditures (see attached). A political committee must file a 24 hour report with the Federal Election Commission as specified in 11 CFR §104.4(c), within 24 hours of any independent expenditures of \$1,000 or more with respect to a given election, made between two and twenty days before an election. The report must be received by the Commission by 11:59 p.m. on the day following the date on which independent expenditures that aggregate \$1,000 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))

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) 694-1176.

Sincerely,

Arman Tarzi Campaign Finance Analyst

Reports Analysis Division

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Missing 24 Hour Report (Schedule E)

State of Hawaii Organization of Police Officers (SHOPO Political Action Fund) (C00510974)

Name of Payee	Date	Amount	Candidate	Election
The Honolulu Star Advertiser	8/1/12	\$1,790.58	LINDA LINGLE	P2012
The Honolulu Star Advertiser	8/1/12	\$1,790.58	MULIUFI F "MUFI" HANNEMANN	P2012
The Honolulu Star Advertiser	8/1/12	\$1,790.58	COLLEEN WAKAKO HANABUSA	P2012