



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

October 5, 2012

ABRAHAM DAVID NIEDERHAUSER, TREASURER
ENDORSE LIBERTY, INC
1625 SUNSET OAKS DR
SALT LAKE CITY, UT 84108

Response Due Date

11/09/2012

IDENTIFICATION NUMBER: C00508002

REFERENCE: AMENDED FEBRUARY MONTHLY REPORT (01/01/2012 - 01/31/2012),
RECEIVED 04/20/2012

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 6 item(s):

1. Schedule B of your report discloses reimbursements to staff for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by staff to any one vendor that make up the reimbursement may have to be itemized. For example, if the related payments to any one vendor aggregate in excess of \$200 for the calendar year, the staff advance payment to the vendor must also be itemized in a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and detailed purpose of the advance. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must indicate so in an amendment to this report. Please amend your report to include the missing or clarifying information. See Advisory Opinion 1996-20 for additional clarification. (11 CFR § 104.9)

2. 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): "Fees." 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

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http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf.

3. On Schedule B supporting Line 21(b) of your report, you have itemized disbursements for which you have failed to include the address. Please amend your report to include the missing information. (11 CFR § 104.3(b)(3))

4. Schedule E of your report indicates that your committee may have failed to file or timely 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))

5. Schedule E of your report indicates that your committee may have failed to 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))

6. Your committee has filed a 24 and 48 hour reports for independent expenditures supporting Ron Paul (see attached) which have not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on 24 and 48 hour reports

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must also be itemized on a corresponding Schedule E or MEMO Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend your report and any subsequent reports that may be affected by this correction. (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) 694-1172.

Sincerely,



Alexandra Broomhead
Senior Campaign Finance Analyst
Reports Analysis Division

Late 24 Hour Report (Schedule E)
Endorse Liberty, Inc. (C00508002)

Name of Payee	Date	Amount	Candidate	Election	Report Received
Google	1/1/2012	\$33,831.42	Ron Paul	P2012 - IA	*1/3/2012
Google	1/1/2012	\$33,817.30	Ron Paul	P2012 - IA	4/6/2012
Google	1/1/2012	\$33,817.30	Ron Paul	P2012 - IA	5/24/2012
Google	1/7/2012	\$31,485.37	Ron Paul	P2012 - IA	5/24/2012
Smiley Media	1/1/2012	\$33,221.45	Ron Paul	P2012 - IA	1/3/2012
Smiley Media	1/1/2012	\$34,882.53	Ron Paul	P2012 - IA	4/6/2012
StumbleUpon	1/1/2012	\$565.40	Ron Paul	P2012 - IA	1/3/2012
StumbleUpon	1/1/2012	\$565.40	Ron Paul	P2012 - IA	4/6/2012
Google	1/9/2012	\$27,462.84	Ron Paul	P2012 - NH	5/24/2012
Smiley Media	1/9/2012	\$10,431.48	Ron Paul	P2012 - NH	4/6/2012
Smith's	1/9/2012	\$12.84	Ron Paul	P2012 - NH	4/6/2012
StumbleUpon	1/9/2012	\$1,785.05	Ron Paul	P2012 - NH	4/6/2012

* Notice amended 5/24/12 to include candidate state and adjust amount of the independent expenditure to \$33,817.30.

Missing 48 Hour Report (Schedule E)

Endorse Liberty, Inc. (C00508002)

Name of Payee	Date	Amount	Candidate	Election
Google	1/15/12	\$18,607.10	Ron Paul	P2012 - CA

Missing Schedule E**Endorse Liberty, Inc. (C00508002)**

Name of Payee	Date	Amount	Election	Candidate
Chris Hanson	1/3/2012	\$300.00	P2012 - IA	Ron Paul
Google	1/1/2012	\$33,817.30	P2012 - IA	Ron Paul
Google	1/1/2012	\$33,817.30	P2012 - IA	Ron Paul
Google	1/3/2012	\$32,714.93	P2012 - IA	Ron Paul
Smiley Media	1/3/2012	\$27,109.77	P2012 - IA	Ron Paul
Smiley Media	1/1/2012	\$34,882.53	P2012 - IA	Ron Paul
StumbleUpon	1/3/2012	\$2,833.45	P2012 - IA	Ron Paul
StumbleUpon	1/1/2012	\$565.40	P2012 - IA	Ron Paul
Google	1/9/2012	\$27,462.84	P2012-NH	Ron Paul
Smiley Media	1/9/2012	\$10,431.48	P2012-NH	Ron Paul
Smith's	1/9/2012	\$12.84	P2012-NH	Ron Paul
StumbleUpon	1/9/2012	\$1,785.05	P2012-NH	Ron Paul
Google	1/15/2012	\$18,607.10	P2012 - SC	Ron Paul
Ridley's	1/20/2012	\$7.69	P2012 - SC	Ron Paul
WHDT	1/14/2012	\$94,188.00	P2012 - SC	Ron Paul

Missing 24 Hour Report (Schedule E)**Endorse Liberty, Inc. (C00508002)**

Name of Payee	Date	Amount	Purpose	Candidate	Election
Chris Hanson	1/3/12	\$300.00	Video Production	Ron Paul	P2012 - NH
Facebook	1/16/12	\$778.29	Online Advertising	Ron Paul	P2012 - FL
Facebook	1/16/12	\$18,270.57	Online Advertising	Ron Paul	P2012 - SC
Google	1/3/12	\$32,714.93	Online Advertising	Ron Paul	P2012 - NH
Plaid Social	1/17/12	\$6,037.83	Video Production	Ron Paul	P2012 - SC
Smiley Media	1/3/12	\$25,818.83	Online Advertising	Ron Paul	P2012 - NH
StumbleUpon	1/3/12	\$2,833.45	Online Advertising	Ron Paul	P2012 - NH
StumbleUpon	1/13/12	\$431.60	Online Advertising	Ron Paul	P2012 - SC