

VGMPAC (C00402545) received notice of exceeding receipt/expenditure limits during the validation process of the 2Q 2006 FEC Form 3X filing (see below for filing errors).

Filing Errors:

Receipts

Miller, Van - Limit \$5000 - Actual \$11000

Walsh, Jim - Limit \$5000 - Actual \$7250

Disbursements

Whalen for Congress (primary) - Limit \$2100 - Actual \$5000

VGMPAC called FEC Business Analysis rep Jennifer immediately for thoughts on how to remedy our errors and her recommendations were as follows:

- 1) Refund excess contributions received and report this on line 28(a) of the 3Q 2006 Form 3X filing
- 2) Redesignate \$2100 of the \$5000 Whalen for Congress disbursement to the general fund & request reimbursement for the remaining \$800 excess contribution

- Notify Whalen in writing of redesignation/reimbursement & send copy of this same correspondence with a cover letter to the FEC at:

FEC
999 E St. NW
Washington, DC 20463

- Report redesignation on the 3Q 2006 Form 3X filing as 2 separate memo disbursement entries on line 23 with the 1st memo entry listing all info the same as originally entered on 2Q 2006 filing except update description to note redesignation. The 2nd memo entry should have the same info with these exceptions:

- Date - Change to redesignation date
- Amount - Change to redesignation amount
- Election - Change to "General"
- Description - Change to "Redesignation"

- Report \$800 refund from Whalen for Congress on line 16 of the 2006 Form 3X filing in the period in which the check is received

- 4) Immediately file Misc Electronic Submission (Form 99) to notify FEC of our intentions to correct the above errors.

Actions taken by VGMPAC:

- 1) Refund checks were issued 7/18/06 to Van Miller for \$6000 (ck# 1042) & Jim Walsh for \$2250 (ck# 1043)
- 2) Letter dated 7/18/06 prepared notifying Whalen for Congress of the redesignation and request for \$800 reimbursement
- 3) Cover letter and supporting documentation dated 7/18/06 prepared notifying FEC of Whalen redesignation/reimbursement request
- 4) Filed Form 99 on 7/18/06 to notify FEC of our intentions to correct errors
- 5) Internally notifying responsible parties of receipt/disbursement limits to prevent these issues from reoccurring

Although these errors were not intentional, VGMPAC will continue to do everything we can to correct them immediately and prevent future reoccurrences.
