



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

June 16, 2016

LOMA WHITEAKER, TREASURER
CLIVE GREY FOR US SENATE
PO BOX 520
PISMO BEACH, CA 93448

Response Due Date

07/21/2016

IDENTIFICATION NUMBER: C00600742

REFERENCE: APRIL QUARTERLY REPORT (10/01/2015 - 03/31/2016)

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. **An adequate response must be received at the Senate Public Records Office by the response date noted above. 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 4 item(s):

1. Please provide a Schedule A to support the amount reported on Line 13(a) of the Detailed Summary Page. Each person who makes a loan to your committee, or to the candidate acting as an agent of the committee, must be itemized on Schedule A and Schedule C. The itemization on Schedule A must include the person's full name, mailing address and zip code, along with the name of his/her employer, his/her occupation, the date of the contribution/loan and the election cycle-to-date amount of contributions made by the person. Schedule C must include any endorser or guarantor of the loan, the date the loan was made and all other terms of the loan. If the loan is from the candidate, you must indicate whether it is from his/her personal funds, or was obtained by the candidate from a bank loan, brokerage account, credit card, home equity line of credit or other line of credit. (52 U.S.C. § 30104(b)(3)(E) (formerly 2 U.S.C. § 434(b)(3)(E)) and 11 CFR § 104.3(a)(4)(iv))

2. Schedule C of your report fails to include information required by Commission Regulations. With every report submitted, you must provide the name and address of the loan source, the date incurred, the original amount of the loan, the due date, the interest rate, the cumulative payment, and the outstanding balance. In addition, if there are any endorsers or guarantors, their mailing address, along with the name of their employer and occupation, must be disclosed. Please amend your report to include the due date for the following

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loan(s): Clive G Grey, 2/29/16, \$25,000. (11 CFR §§ 100.52(a), 100.52(b) and 104.3(d))

3. Your report discloses a loan from the candidate that he or she obtained from a lending institution. However, you have not submitted a Schedule C-1. You must disclose the terms, including the due date and interest rate, between the candidate and the lending institution on Schedule C-1. Schedule C-1 can be downloaded from the FEC website at <http://www.fec.gov>, or requested through the FEC Faxline at (202) 501-3413. Please amend your report to include a Schedule C-1. (11 CFR § 104.3(d)(1))

4. Schedule C of your report discloses that the loan from "Clive G Grey - personal credit card" is a line of credit. When a committee establishes a line of credit or receives a loan from the candidate derived from a line of credit, the committee must file a Schedule C-1 with its next report to disclose the initial terms of the credit line (guarantors or endorsers, if any; name of the lending institution; interest rate). In succeeding reporting periods, the committee must file a Schedule C-1 each time any draws are made on the line of credit and each time the line of credit is restructured to change repayment terms. (11 CFR § 104.3(d)(1), (2), and (3))

After the initial terms of the credit line are disclosed, the credit line should be reported on Schedules A and C as it is used. Each time the credit line is activated, the amount drawn should be reported either on Line 13(a) of the Detailed Summary Page for all lines of credit obtained by the candidate (including those guaranteed or endorsed by the candidate), or on Line 13(b) of the Detailed Summary Page for lines of credit obtained by the committee. A new Schedule C should be provided disclosing the date incurred, due date, interest rate, original amount of the loan, cumulative payment, outstanding balance, and any guarantor or endorser of the line of credit. Payments made to the candidate to repay a candidate loan derived from a line of credit should be reported on Line 19(a) of the Detailed Summary Page and itemized on a supporting Schedule B as loan payments. Payments made on a credit line obtained by the committee from a lending institution should be reported on Line 19(b) and itemized on a supporting Schedule B as loan payments.

Please file an amendment to your report that includes schedule C-1.

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

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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.**

A written response or an amendment to your original report(s) correcting the above problems should be filed with the Senate Public Records Office. Please contact the Senate Public Records Office at (202) 224-0322 for instructions on how and where to file an amendment. 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) 694-1142.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon Ringgold". The signature is written in a cursive, flowing style.

Shannon Ringgold
Campaign Finance Analyst
Reports Analysis Division