



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

April 10, 2017

SHAWN O'NEAIL, TREASURER  
NOVARTIS CORPORATION POLITICAL ACTION  
COMMITTEE  
701 PENNSYLVANIA AVE. NW SUITE 725  
WASHINGTON, DC 20004

**Response Due Date**  
**05/15/2017**

IDENTIFICATION NUMBER: C00033969

REFERENCE: 30 DAY POST-GENERAL REPORT (10/20/2016 - 11/28/2016)

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. **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 1 item(s):

- Schedule B supporting Line 29 of your Detailed Summary Page discloses a disbursement for "Cash on Hand Adjustment ? See note." for \$13,830.83. In a Miscellaneous Electronic Submission ("FEC Form 99"), filed 12/8/16, you state, "This adjustment is the end result of the completion of a voluntary audit of our records and a desired effort to correct past mistakes made in the collection and deposit of payroll deduction funds intended for the PAC. During the review of records, we were able to confirm that more deductions were collected than were ultimately deposited into the PAC account. Thus, the PAC has disclosed more funds than exist in our bank account over time. The PAC believed it was receiving details of deductions collected for reporting purposes; however, the deposits to the PAC account by the corporation were not made in a manner that made it easy for either party to confirm which deductions were deposited and when. At no time, did the PAC have more funds in our bank account than disclosed, and thus we were not in danger of failing to disclose contributions received to the public." Please provide any clarifying information as to the details of this disbursement and why this activity was not disclosed on the original report covering the period during which it took place.

**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

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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. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. 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,

A handwritten signature in black ink, appearing to read "Jack Baisden". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Jack Baisden  
Senior Campaign Finance Analyst  
Reports Analysis Division