



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

July 3, 2013

STACEY BERNARDS, TREASURER
HONEYWELL INTERNATIONAL POLITICAL
ACTION COMMITTEE
101 CONSTITUTION AVE., NW, SUITE 500 WEST
WASHINGTON, DC 20001

Response Due Date
08/07/2013

IDENTIFICATION NUMBER: C00096156

REFERENCE: MARCH MONTHLY REPORT (02/01/2013 - 02/28/2013)

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 of your report discloses one or more contributions to federal candidate committees (see attached) for the retirement of debts incurred by the 2012 Primary election and 2012 General election campaigns; however, it appears that the recipient committee(s) had insufficient debts to warrant such a contribution. Please note that a committee may only designate contributions to retire a candidate's debts if those debts exist. (11 CFR §§ 110.1(b) and 110.2(b))

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund. (11 CFR §103.3(b) (1) and (3))

Please inform the Commission of your corrective action promptly in writing

HONEYWELL INTERNATIONAL POLITICAL ACTION COMMITTEE

Page 2 of 2

and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, refunds are reported on Line 16 of the Detailed Summary Page and on Schedule A of the report covering the period during which they are received. Redesignations are reported as memo entries on Schedule B of the report covering the period during which the redesignation is made.

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

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) 694-1177.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Jones".

Brian Jones
Senior Campaign Finance Analyst
Reports Analysis Division

**Impermissible Contributions
Honeywell International Political Action Committee (C00096156)**

Contributions to Retire Debts but No Debt Declared by Candidate

Recipient Name	Date	Amount	Election	Report
Denny Heck for Congress	2/5/13	\$2,000.00	Debt P2012	2013 March Monthly
Friends of Chris Stewart	2/5/13	\$3,000.00	Debt P2012	2013 March Monthly
Friends of Pete Gallego	2/5/13	\$2,000.00	Debt G2012	2013 March Monthly
Jim Renacci for Congress	2/5/13	\$1,500.00	Debt P2012	2013 March Monthly
Thomas Massie for Congress	2/5/13	\$3,000.00	Debt P2012	2013 March Monthly