



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

August 16, 2005

Carol Davis, Treasurer
Sanders for Senate
P.O. Box 391
Burlington, VT 05402

Response Due Date:
September 15, 2005

Identification Number: C00411330

Reference: July Quarterly Report (4/1/05 – 6/30/05)

Dear Ms. Davis:

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. **An adequate response must be received at the Senate Public Records Office by the response date noted above.** An itemization of the information needed follows:

-Line 1 of FEC Form 3Z-1 discloses \$300,048.34 in gross receipts for the Primary Election and \$5,000.00 in gross receipts for the General Election. However, information provided on this report and in prior reports discloses additional activity that should be included in this total. Gross receipts includes all receipts disclosed on Lines 11, 12, 13, 14 and 15 of the Detailed Summary Page by all of the candidate's authorized committees. Please correct this discrepancy and file an amendment to your report. (11 CFR §104.19(b))

-Please amend your report to include a *complete* supporting Schedule A for the amount reported on Line 12 of the Detailed Summary Page. All transfers to your committee from authorized committees of the same candidate must be itemized on Schedule A, regardless of the amount transferred. (11 CFR §104.3(a)(4)(iii))

-Your report discloses \$253,476.34 in un-itemized individual contributions on Line 11(a)(ii), Column A, of the Detailed Summary Page. When contributions from an individual reach \$200 for an election cycle, each subsequent contribution from that individual must be itemized, regardless

2503030315

of the amount. The itemization should include the full name, mailing address and zip code of the person, along with the name of his/her employer, the date of the contribution, his/her occupation, the election designation and the election cycle-to-date amount of contributions made by the person. Please amend your report to provide a Schedule A if necessary, or to clarify that for the contributions in question, the aggregate total for the election cycle for each contributor does not exceed \$200. (11 CFR §104.3(a)(4)(i))

-Commission Regulations define the term "purpose" to mean a brief statement or description of why a disbursement was made. Examples are "dinner expense", "media", "salary", "polling", "travel", "party fees", "phone banks", "travel expenses", "travel expense reimbursement" and "catering costs". Examples of election day and voter registration activity include "exit polling", "door-to-door get out the vote", "get out the vote phone calls" and "driving voters to the polls". Unacceptable descriptions, which require additional clarification, include but are not limited to "advance", "consulting", "commission", "contract labor", "retainer", "election day expense", "expenses", "invoice", "support", "expense reimbursement", "miscellaneous", "professional services", "get-out-the-vote", "voter registration", "consultation", "campaign general". (11 CFR §104.3(b)(4)(A)) Please amend Schedule B of your report to correct the descriptions that do not meet the requirements of the Regulations.

-Schedule B of your report discloses disbursements to credit card companies. When reporting payments to credit card companies, if the payment to the original vendor aggregates in excess of \$200 in an election cycle, you must itemize, as a memo entry, the name and address of the original vendor, together with the date, amount and purpose of the expenditure. If itemization is not necessary, you must indicate so in an amendment to this report. Please correct your report to include the missing information. (11 CFR §104.9)

-Schedule B of your report discloses reimbursements to individuals for expenses other than travel and subsistence. Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in an election cycle, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. If itemization is not necessary, you must indicate so in an

2025 RELEASE UNDER E.O. 14176

amendment to this report. Please correct your report to include the missing information. (11 CFR §§ 104.3(b)(4)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20)

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. 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.

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 1, then press 2 to reach the Reports Analysis Division) or my local number (202) 694-1154.

Sincerely,



Leah S. Palmer
Senior Campaign Finance Analyst
Reports Analysis Division

25038883316