RQ-2

September 25, 2014

CHERYL FRASCA, TREASURER TREADWELL ALASKA INC PO BOX 200125 ALASKA, AK 99520

Response Due Date 10/30/2014

IDENTIFICATION NUMBER: C00546135

REFERENCE: 12 DAY PRE-PRIMARY REPORT (07/01/2014 - 07/30/2014)

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 5 item(s):

- 1. The totals listed on Lines 6(a), 6(c), 7(a), 7(c), 11(a)(iii), 11(e), 16, 17, and 22, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the election cycle-to-date totals (11/5/08 through 11/4/14). (52 U.S.C.§ 30104(b) (formerly 2 U.S.C.§ 434(b)) and 11 CFR § 104.3)
- 2. On Schedule B supporting Line 17 of your report, you have itemized disbursements for which you have failed to include the address. Please amend your report to include the missing information. (11 CFR § 104.3(b)(4))
- **3.** Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 17 of your report to clarify the attached descriptions. For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(4)(i)(A).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register is available on the FEC website at

TREADWELL ALASKA INC

Page 2 of 4

www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_350 7.pdf. A non-exhaustive list of acceptable purposes is also available on the FEC website at http://www.fec.gov/rad/pacs/documents/ExamplesofAdequate Purposes.pdf.

- **4.** Schedule B of your report discloses reimbursements to individuals for the attached disbursements: "Reimbursement for Contribution to General Fund," "Reimbursement for Events," and "Reimbursement for Food." 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. Please amend your report to include the missing information on Schedule B and clearly identify each memo entry supporting a reimbursement. If itemization is not necessary, you must indicate so in an amendment to this report. (11 CFR §§ 104.3(b)(4)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3)
- **5.** Debt payments for this period (disclosed on Schedule D) are greater than the payments itemized on Schedule B. Each expenditure to a person, which in the aggregate exceeds \$200 for the election cycle, must be reported on Schedule B. "Person" includes an individual, partnership, corporation, association, and public or private organization -- other than an agency of the United States Government. Please amend your report to correct the discrepancies in the payments made to "Mead Treadwell." (11 CFR §§ 104.3(b)(4)(i) and 100.10)
- For your information and consideration, since the candidate will not participate in the general election, any contribution received for the general election must be returned to the donors or redesignated to the primary if your committee has net debts outstanding for the primary election. To redesignate a contribution, the committee must either (1) obtain signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election, or (2) redesignate the contribution by presumption to the primary election, for undesignated contributions made after the primary but before the general election, provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing. The notification must give the contributor an opportunity to request a refund. A contribution can only be redesignated to a previous election to the extent that the contribution does

TREADWELL ALASKA INC

Page 3 of 4

not exceed net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i) and (5)(ii)(C)) Any subsequent report(s) filed with the Commission must disclose the refund or redesignation of any general election contribution. Refunds or redesignations must be done within 60 days after the 2014 Primary Election.

- Your report includes a loan owed to the candidate with a due date of 6/15/14. Please note that an overdue loan from the candidate's personal funds may be considered a contribution from the candidate if new terms are not disclosed. (11 CFR § 104.3(d))
- Your report disclosed a category of financial activity that appears to be disclosed on the wrong line of the Detailed Summary Page. For your information and consideration when preparing future filings, refunds of individual contributions should be properly disclosed on a separate Schedule B, supporting Line 20(a) of the Detailed Summary Page. Please refer to the Form 3 instructions for each line when determining the proper categorization(s) for your next filing. (11 CFR § 104.3(a) and (b))

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.

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) 694-1138.

TREADWELL ALASKA INC

Page 4 of 4

Sincerely,

Carolina Mongeon

Senior Campaign Finance Analyst

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Reports Analysis Division

427

Incorrectly Reported Disbursements Treadwell Alaska Inc. (C00546135)

Inadequate Purposes

Inadequate Purposes			
Name	Date	Amount	Purpose
A. Milano Strategies	7/15/14	\$1,801.65	Administrative/Salary/Overhead Expenses
Alaska Airlines	7/7/14	\$456.50	Administrative/Salary/Overhead Expenses
Alaska Airlines	7/16/14	\$306.50	Administrative/Salary/Overhead Expenses
Alaska Airlines	7/29/14	\$462.70	Administrative/Salary/Overhead Expenses
Alaska Airlines	7/29/14	\$534.80	Administrative/Salary/Overhead Expenses
Bohnert, Jack	7/7/14	\$102.00	Administrative/Salary/Overhead Expenses
Brady, Kennis	7/1/14	\$1,641.60	Administrative/Salary/Overhead Expenses
Brady, Kennis	7/15/14	\$1,641.60	Administrative/Salary/Overhead Expenses
Cale Green	7/9/14	\$825.30	Administrative/Salary/Overhead Expenses
Cale Green	7/9/14	\$825.30	Administrative/Salary/Overhead Expenses
Cale Green	7/15/14	\$1,571.60	Administrative/Salary/Overhead Expenses
Carlyle LLC	7/9/14	\$3,457.60	Administrative/Salary/Overhead Expenses
Custom Designed	7/2/14	\$2,050.00	Administrative/Salary/Overhead Expenses
Dittman	7/9/14	\$500.00	Administrative/Salary/Overhead Expenses
Eddie Mahe Consulting LLC	7/23/14	\$4,038.57	Administrative/Salary/Overhead Expenses
Era Aviation	7/9/14	\$170.00	Administrative/Salary/Overhead Expenses
Era Aviation	7/28/14	\$239.00	Administrative/Salary/Overhead Expenses
GCI	7/9/14	\$275.00	Administrative/Salary/Overhead Expenses
GCI	7/30/14	\$235.57	Administrative/Salary/Overhead Expenses
Great Originals	7/9/14	\$440.05	Administrative/Salary/Overhead Expenses
Home Depot	7/9/14	\$223.24	Administrative/Salary/Overhead Expenses
Home Depot	7/30/14	\$157.92	Administrative/Salary/Overhead Expenses
Lowe's Hardware	7/8/14	\$1,283.86	Administrative/Salary/Overhead Expenses
Nation Builder	7/22/14	\$199.00	Administrative/Salary/Overhead Expenses
Office Depot	7/7/14	\$280.77	Administrative/Salary/Overhead Expenses
Office Depot	7/9/14	\$215.88	Administrative/Salary/Overhead Expenses
Piccolino's Restaurant	7/30/14	\$268.85	Administrative/Salary/Overhead Expenses
Squires Resource Development	7/9/14	\$2,000.00	Administrative/Salary/Overhead Expenses
Technipress Printing LLC	7/7/14	\$510.05	Administrative/Salary/Overhead Expenses
Trail Blazer	7/2/14	\$1,746.88	Administrative/Salary/Overhead Expenses
United States Treasury	7/1/14	\$1,931.96	Administrative/Salary/Overhead Expenses
United States Treasury	7/3/14	\$1,363.00	Administrative/Salary/Overhead Expenses
United States Treasury	7/17/14	\$1,687.00	Administrative/Salary/Overhead Expenses
Wells Fargo Bank	7/8/14	\$500.00	Administrative/Salary/Overhead Expenses

Incorrectly Reported Disbursements Treadwell Alaska Inc. (C00546135)

Wells Fargo Bank	7/9/14	\$200.00	Administrative/Salary/Overhead Expenses
Wells Fargo Bank	7/11/14	\$836.21	Administrative/Salary/Overhead Expenses
WilandDirect	7/8/14	\$375.00	Administrative/Salary/Overhead Expenses
Brady, Kennis	7/7/14	\$130.46	Campaign Materials
Kenai Safari Peninsula Chapter	7/11/14	\$240.00	Event
Alaska Outdoor Council	7/11/14	\$275.00	Event
Gorka, Rick	7/7/14	\$500.00	Final Payment
Chris Russell Consulting LLC	7/10/14	\$1,500.00	Final Payment
Technipress Printing LLC	7/15/14	\$232.30	Invoice #10915
Motznik Information Systems	7/15/14	\$2,000.00	Invoice # 42754
Alaska Printing	7/15/14	\$1,338.62	Invoice #135926 135937 135938
Phillips, Robin	7/15/14	\$1,521.60	July 1 - July 15th 2014
Harmony Shields	7/15/14	\$500.00	July 15 Invoice
Eagle Icommunications LLC	7/7/14	\$2,300.00	Professional Fee
Johnson, Charles C	7/8/14	\$2,000.00	Professional Fees
Christopher Nelson &	_		
Associates	7/2/14	\$2,500.00	Professional Fees #2300