



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

July 11, 2019

PAUL EGERMAN, TREASURER
WARREN FOR PRESIDENT, INC.
124 WASHINGTON STREET SUITE 101
FOXBORO, MA 02035

Response Due Date
08/15/2019

IDENTIFICATION NUMBER: C00693234

REFERENCE: APRIL QUARTERLY REPORT (01/01/2019 - 03/31/2019)

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 4 item(s):

1. Line 17(a)(ii) of the Detailed Summary Page discloses \$4,229,723.85 in unitemized receipts from individuals/persons other than political committees during the reporting period. When contributions from an individual reach \$200 for an election cycle, each subsequent contribution from that individual must be itemized, regardless 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-P 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))
2. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B-P supporting Line 23 of your report to clarify the following descriptions: "Consultation Services." 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 and a non-exhaustive list of acceptable purposes are available on the FEC website at <http://www.fec.gov/help-candidates-and-committees/purposes-disbursement/>.

3. Schedule B-P of your report discloses reimbursements to individuals for the

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following travel related disbursement(s): "Travel." When the reimbursement amount to individuals for travel and subsistence advances exceeds \$500, the payments by staff to any one vendor that make up the reimbursement may have to be itemized. For example, if the related payments to any one vendor aggregate in excess of \$200 for the election cycle, the staff advance payment to the vendor must also be itemized in a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and detailed purpose of the advance. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must indicate so in an amendment to this report. Please amend your report to include the missing or clarifying information. See Advisory Opinion 1996-20 for additional clarification. (11 CFR § 104.9)

4. Schedules A-P and B-P of your report disclose expenditures from the candidate's personal funds on behalf of the committee. Authorized committees must disclose all expenditures from personal funds made by the candidates on behalf of their committees, just as they would disclose any other disbursements that they may make. Out-of-pocket spending by candidates, as agents of their authorized committees, requires memo entry itemization of the ultimate vendor if the aggregate amount of payments to that vendor exceeds \$200 for the election cycle. The memo entry must include the date, amount, and purpose of the out-of-pocket payments, as well as the name and address of the vendor to which payment was made. Please amend your report to include the missing information on Schedule B or indicate that memo entry itemization is not required. (52 U.S.C. §30104(b)(4), (5), (6)(A) (formerly 2 U.S.C. §§ 434(b)(4), (5), (6)(A)); 11 CFR § 104.3(b)(4); Federal Register Notice 2013-09)

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. For more information about the report review process or specific filing information for your committee type, please visit <http://transition.fec.gov/rad/>. 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

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(800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1174.

Sincerely,

A handwritten signature in black ink, appearing to read "Jaime", with a stylized flourish extending to the right.

Jaime Amrhein
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

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