



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

December 9, 2018

MARGARET B. GUPTA, TREASURER  
WINDEM  
198 VAN BUREN ST. SUITE 200  
HERDON, VA 20170

**Response Due Date**  
**01/14/2019**

IDENTIFICATION NUMBER: C00678870

REFERENCE: 12 DAY PRE-GENERAL REPORT (10/01/2018 - 10/17/2018)

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 enforcement action.** Additional information is needed for the following 3 item(s):

1. Schedule A of your report discloses earmarked contributions totaling \$2,700, with no corresponding entries on Schedule B. Pursuant to 11 CFR §110.6(c)(1)(v), all earmarked contributions that have passed through a conduit's account must be itemized on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of amount. All earmarked contributions that have been forwarded in the form of the contributor's check or written instrument must be itemized as memo entries on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of the amount. Please amend your report to clarify these discrepancies.

2. Schedule B of your report discloses earmarked contributions totaling \$2,700, with no corresponding entries on Schedule A. Pursuant to 11 CFR §110.6(c), all earmarked contributions, that have passed through a conduit's account, must be itemized on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of the amount. All earmarked contributions that have been forwarded in the form of the contributor's check or written instrument must be itemized as memo entries on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of the amount. Please identify the original contributors for the earmarked contributions disclosed on Schedule B.

3. Please be advised that for each earmarked contribution forwarded must provide the information required by 11 CFR §110.6(c)(1)(iv)(A) through (C). Pursuant to 11 CFR §110.6(c), all earmarked contributions, that have passed

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through a conduit's account, must be itemized on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of the amount. On your report, the dates of the forwarded earmarks on Schedule B are preceding the dates of the receipts on Schedule A. Please clarify this discrepancy and provide the exact date the earmarked contribution was received by your committee (Schedule A) and forwarded to the recipient candidate (Schedule B). Please see attached for the entries on Schedule B that have been forwarded before the Committee received them on Schedule A.

**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 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) 694-1169.

Sincerely,



Kevin Fortkiewicz  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division

**Impermissible, Excessive, and Prohibited Contributions  
WINDEM (C00678870)**

**Earmarks Transferred Before Received**

<b>Committee Name</b>	<b>Date</b>	<b>Amount</b>	<b>Earmarked by</b>
BETO FOR TEXAS	10/4/18	\$2,700.00	Earmarked by Margaret Gupta
BETO FOR TEXAS	10/4/18	\$2,700.00	Earmarked by Shashi Gupta
BILL NELSON FOR U S SENATE	10/4/18	\$2,700.00	Earmarked by Margaret Gupta
BILL NELSON FOR U S SENATE	10/4/18	\$2,700.00	Earmarked by Shashi Gupta
BREDESEN FOR SENATE	10/4/18	\$2,700.00	Earmarked by Margaret Gupta
BREDESEN FOR SENATE	10/4/18	\$2,700.00	Earmarked by Shashi Gupta
CINDY AXNE FOR CONGRESS	10/11/18	\$2,700.00	Earmarked by Albert Dwoskin
DONNELLY FOR INDIANA	10/4/18	\$2,700.00	Earmarked by Margaret Gupta
DONNELLY FOR INDIANA	10/4/18	\$2,700.00	Earmarked by Shashi Gupta
FINKENAUER FOR CONGRESS	10/5/18	\$2,700.00	Earmarked by Nancy Rice
FINKENAUER FOR CONGRESS	10/11/18	\$2,700.00	Earmarked by Albert Dwoskin
FRIENDS OF DANA BALTER	10/5/18	\$2,700.00	Earmarked by Nancy Rice
HEIDI FOR SENATE	10/4/18	\$2,700.00	Earmarked by Margaret Gupta
HEIDI FOR SENATE	10/4/18	\$2,700.00	Earmarked by Shashi Gupta
JILL SCHILLER FOR CONGRESS	10/5/18	\$2,700.00	Earmarked by Nancy Rice
KATIE PORTER FOR CONGRESS	10/11/18	\$2,700.00	Earmarked by Albert Dwoskin
MANCHIN FOR WEST VIRGINIA	10/4/18	\$2,700.00	Earmarked by Margaret Gupta
MANCHIN FOR WEST VIRGINIA	10/4/18	\$2,700.00	Earmarked by Shashi Gupta
MCCASKILL FOR MISSOURI	10/4/18	\$2,700.00	Earmarked by Margaret Gupta
MCCASKILL FOR MISSOURI	10/4/18	\$2,700.00	Earmarked by Shashi Gupta
MIKE ESPY FOR SENATE CAMPAIGN COMMITTEE	10/4/18	\$2,700.00	Earmarked by Margaret Gupta
MIKE ESPY FOR SENATE CAMPAIGN COMMITTEE	10/4/18	\$2,700.00	Earmarked by Shashi Gupta
ROSEN FOR NEVADA	10/4/18	\$2,700.00	Earmarked by Margaret Gupta
ROSEN FOR NEVADA	10/4/18	\$2,700.00	Earmarked by Shashi Gupta
SINEMA FOR ARIZONA	10/4/18	\$2,700.00	Earmarked by Margaret Gupta
SINEMA FOR ARIZONA	10/4/18	\$2,700.00	Earmarked by Shashi Gupta
WILLIAMS FOR MONTANA	10/5/18	\$2,700.00	Earmarked by Nancy Rice