



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

RQ-2

March 19, 2024

RICK BETTGER, TREASURER
PETE RICKETTS FOR SENATE
11235 DAVENPORT ST STE 107
OMAHA, NE 68154

Response Due Date**04/23/2024**

IDENTIFICATION NUMBER: C00832436

REFERENCE: YEAR-END REPORT (10/01/2023 - 12/31/2023)

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. Schedule A supporting Line 12 of the Detailed Summary Pages of your combined **2023** reports discloses transfer(s) that exceed the sum of memo Schedule A entries (see attached). Please note that the sum of memo Schedule A supporting a transfer(s) from a joint fundraising committee should be greater than or equal to the amount of the transfer(s).

Each participating committee shall report its share for **net** proceeds received from the joint fundraising committee as a transfer-in on Schedule A. A memo Schedule A must be provided to itemize your committee's share of the **gross** contributions received through the joint fundraiser. The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the election cycle and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount. (11 CFR § 102.17(c)(8)(i)(B)) Please amend your report to include the missing Schedule A or provide an explanation for this apparent discrepancy.

2. Schedule A supporting Line 11(c) of your report discloses contributions from political committees and fails to include the complete address. Please amend your report to include the missing information. (11 CFR § 104.3(a)(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

PETE RICKETTS FOR SENATE

Page 2 of 3

your report to clarify the following description(s): "Dismal Event Trip Reimbursement" and "Event Reimbursements." 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/>.

4. Schedules A and B 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)

- 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, joint fundraising transfers should be properly disclosed on a separate Schedule A, supporting Line 12 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.**

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 information about the report

PETE RICKETTS FOR SENATE

Page 3 of 3

review process or specific filing information for your committee type, please visit www.fec.gov/help-candidates-and-committees. For more information about Requests for Additional Information (RFAI), why you received a letter, and how to respond, please visit www.fec.gov/help-candidates-and-committees/request-additional-information. Should you 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) 694-1411.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Mastropasqua", with a stylized flourish at the end.

Grace Mastropasqua
Campaign Finance Analyst

Joint Fundraising Transfers Exceed Memo Entries
Pete Ricketts for Senate (C00832436)

2024 Republican Senate Victory

Report	Transfers	Memo Entries
2023 Year-End	\$90,675.00	\$82,675.96
Total	\$90,675.00	\$82,675.96