



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 19, 2018

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

Response Due Date
12/24/2018

IDENTIFICATION NUMBER: C00678870

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2018 - 09/30/2018)

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 1 item(s):

- 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 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

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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

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

Earmarks Transferred Before Received

Committee Name	Date	Amount	Earmarked by
ANGIE CRAIG FOR CONGRESS	9/6/18	\$2,700.00	Earmarked by Thomson Hirst
FLACCAVENTO FOR CONGRESS	9/6/18	\$2,700.00	Earmarked by Frederick Schaufeld
FLACCAVENTO FOR CONGRESS	9/6/18	\$2,700.00	Earmarked by Karen Schaufeld
CONNOLLY FOR CONGRESS	7/31/18	\$2,700.00	Earmarked by Karen Schaufeld
FRIENDS OF DANA BALTER	9/6/18	\$2,700.00	Earmarked by Karen Schaufeld
FINKENAUER FOR CONGRESS	9/6/18	\$2,700.00	Earmarked by Thomson Hirst
COMMITTEE TO ELECT FRANK MCNEILL	9/6/18	\$2,700.00	Earmarked by Karen Schaufeld
JASON CROW FOR CONGRESS	9/6/18	\$2,700.00	Earmarked by Magaly Hirst
WILLIAMS FOR MONTANA	9/6/18	\$2,700.00	Earmarked by Thomson Hirst
LIZ FOR INDIANA	9/6/18	\$2,700.00	Earmarked by Magaly Hirst
LIZ FOR INDIANA	9/6/18	\$2,700.00	Earmarked by Frederick Schaufeld
LIZ FOR INDIANA	9/6/18	\$2,700.00	Earmarked by Karen Schaufeld
ELIZABETH PANNILL FLETCHER FOR CONGRESS	9/6/18	\$2,700.00	Earmarked by Magaly Hirst
ELIZABETH PANNILL FLETCHER FOR CONGRESS	9/6/18	\$2,700.00	Earmarked by Thomson Hirst
MJ FOR TEXAS	9/6/18	\$2,700.00	Earmarked by Frederick Schaufeld
COMMITTEE TO ELECT RICHARD OJEDA	9/6/18	\$2,700.00	Earmarked by Frederick Schaufeld
PERRY GERSHON FOR CONGRESS	9/6/18	\$2,700.00	Earmarked by Frederick Schaufeld
SPANBERGER FOR CONGRESS	9/6/18	\$2,700.00	Earmarked by Magaly Hirst
SUSAN WILD FOR CONGRESS	9/6/18	\$2,700.00	Earmarked by Magaly Hirst
SUSAN WILD FOR CONGRESS	9/6/18	\$2,700.00	Earmarked by Karen Schaufeld
SUSIE LEE FOR CONGRESS	9/6/18	\$2,700.00	Earmarked by Magaly Hirst
FRIENDS OF TABITHA ISNER	9/6/18	\$2,700.00	Earmarked by Frederick Schaufeld
WEXTON FOR CONGRESS	9/6/18	\$2,700.00	Earmarked by Thomson Hirst
WEXTON FOR CONGRESS	9/6/18	\$2,700.00	Earmarked by Karen Schaufeld