

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

October 16, 2016

ROBERT H. FRANK, TREASURER THE 2016 COMMITTEE 370 MAPLE AVENUE W SUITE 4 VIENNA, VA 22180-5615

Response Due Date 11/21/2016

IDENTIFICATION NUMBER: C00569905

REFERENCE: JULY QUARTERLY REPORT (04/01/2016 - 06/30/2016)

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 $\underline{7}$ item(s):

1. The totals listed on Line(s) 21(b), 21(c), 28(a) and 28(d), Column B of the Detailed Summary Page 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 Calendar Year-to-Date totals. (52 U.S.C. §30104(b) (formerly 2 U.S.C. § 434(b)))

2. On Schedule B supporting Line 21(b), you have itemized disbursements for which you have failed to include the address. Please amend your report to include the missing information. $(11 \text{ CFR } \S 104.3(b)(3))$

3. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "FULFILLMENT ITEMS," "CONSULTING," and "BACK-END COST." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate disbursement purposes of Federal Register found published in the can be at

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http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list _3507.pdf.

4. Schedule B discloses reimbursements to individuals for "TRAVEL." When the reimbursement amount to individuals for travel and subsistence advances exceeds \$500, the payments by individuals 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 calendar year, the individual 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 Advisory Opinion 1996-20 for clarifying information. See additional clarification. (11 CFR § 104.9)

5. Schedule B supporting Line 21(b) discloses disbursements to credit card companies. When reporting payments to credit card companies, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, you must itemize the name of the original vendor, address, date, amount, and purpose as a memo entry as well as clearly identify the credit card payment to which each memo entry relates. Please amend your report to include the missing information or provide clarifying information if memo items are not required. (11 CFR § 104.9)

6. Your report discloses debts with outstanding beginning balances that do not equal the corresponding closing balances of your previous report (see attached). These should be the Please amounts same. correct these discrepancies and file an amendment to your report(s). (52 U.S.C. §30104(b)(8) (formerly 2 U.S.C. §434(b)(8)) and 11 CFR §104.11)

7. Schedule D supporting Line 10 of your report discloses a debt(s) owed by your committee to "DirecTV" and "RST Marketing" with a negative closing balance(s). You are advised that any debt(s) with a negative closing balance requires further clarification. A negative closing balance suggests that you have either made a mathematical error or overpaid the debt which would result in the vendor incurring a debt owed to your committee and should be reported on Schedule D supporting Line 9 of your report. Further, a credit from a vendor should be reported as a negative entry in the "amount incurred this period" field of the original debt and not as a separate debt transaction. In addition, credits

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from vendors require clarifying information to ensure that your committee did not receive a prohibited in-kind contribution per 11 CFR. \$100.52 (d)(1). Please amend your report to clarify the nature of this transaction(s).

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.

<u>Electronic filers must file amendments (to include statements, designations and reports)</u> 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. 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) 694-1172.

Sincerely,

Jud Brise

Jack Baisden Senior Campaign Finance Analyst Reports Analysis Division

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Debts with Balance Discrepancies The 2016 Committee (C00569905)

Name	Closing Balance [Previous Report]	Opening Balance [Current Report]
Campaign Funding Direct	\$0.00	\$79,968.44
Campaign Funding Direct	\$0.00	\$12,000.00
Campaign Funding Direct	\$0.00	\$556.48
Campaign Funding Direct	\$0.00	\$25.00
Campaign Funding Direct	\$0.00	\$119.45
Chocklett Press, Inc.	\$0.00	\$4,154.94
Chocklett Press, Inc.	\$0.00	\$20,956.65
Colortree Group, Inc.	\$0.00	\$23,578.58
CP Direct	\$0.00	\$54,451.75
D & D Unlimited, Inc.	\$0.00	\$6,870.91
D & D Unlimited, Inc.	\$0.00	\$1,395.81
DirectMail.com	\$0.00	\$5,335.55
DirectMail.com	\$0.00	\$1,438.58
DirectMail.com	\$0.00	\$749.72
ECG Data Center	\$0.00	\$7,887.18
ECG Data Center	\$0.00	\$15,829.08
ECG Data Center	\$0.00	\$7,024.60
ECG Data Center	\$0.00	\$2,305.65
EZTVspots.com	\$0.00	\$900.00
International Data Management, Inc.	\$0.00	\$1,921.08
KACO	\$0.00	\$690.02
MDI Imaging & Mail	\$0.00	\$144.67
MediaUSA	\$0.00	\$4,800.00
Omega List Company	\$0.00	\$68,792.91
Omega List Company	\$0.00	\$23,428.28
Pinkston Digital Inc	\$0.00	\$12,045.69
RST Marketing	\$0.00	\$53,056.10
RST Marketing	\$0.00	\$643.02
RST Marketing	\$0.00	\$21,781.00
RST Marketing	\$0.00	\$3,455.56
Sisk Fulfillment Services	\$0.00	\$255.00
Sisk Fulfillment Services	\$0.00	\$11,955.33
Sisk Fulfillment Services	\$0.00	\$285.00
Southeastern Freight Lines	\$0.00	\$1,090.91
Southwest Publishing & Mailing	\$0.00	\$9,488.55
Southwest Publishing & Mailing	\$0.00	\$12,513.35
The UPS Store	\$0.00	\$12,040.34
Tri State Envelope Corp.	\$0.00	\$15,725.54

Debts with Balance Discrepancies The 2016 Committee (C00569905)

Name	Closing Balance [Previous Report]	Opening Balance [Current Report]
Washington Intelligence Bureau	\$0.00	\$2,289.20
Washington Intelligence Bureau	\$0.00	\$6,614.41
Washington Intelligence Bureau	\$0.00	\$596.41
Washington Intelligence Bureau	\$0.00	\$596.41
William J. Olson, p.c.	\$0.00	\$15,734.87
ZIP Mailing Services, Inc.	\$0.00	\$21,222.90