



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 31, 2020

LORNA KUNEY, TREASURER
STEVE DAINES FOR MONTANA
PO BOX 1598
HELENA, MT 59624-1598

Response Due Date
05/05/2020

IDENTIFICATION NUMBER: C00491357

REFERENCE: YEAR-END REPORT (10/01/2019 - 12/31/2019)

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 2 item(s):

1. Schedule A supporting Line 12 of the Detailed Summary Page(s) of your combined **2019** 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 12 of your report discloses transfers from Senate Conservative Fund, that appear to be received through joint fundraising efforts. However, Senate Conservative is not disclosed as a joint fundraising representative on your Statement of Organization. Please amend your Statement of Organization to disclose the joint fundraising representative as an authorized committee of the candidate or amend your report to provide clarifying

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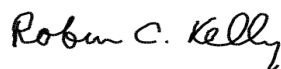
information. (11 CFR §102.2(b)(1)(i) and 11 CFR §102.17(b)(2))

- 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, contributions from political party committees should be properly disclosed on a separate Schedule A, supporting Line 11(b) of the Detailed Summary Page, in addition, **all** contributions from other political committees (such as PACs) should be itemized on a Schedule A, supporting Line 11(c). 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 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 (RAI), 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) 694-1170.

Sincerely,



Robin Kelly
Senior Campaign Finance Analyst
Reports Analysis Division

**Joint Fundraising Transfers Exceed Memo Entries
Steve Daines for Montana (C00491357)**

Defend the Senate

Report	Transfers	Memo Entries
2019 April Quarterly	\$106,715.20	\$107,000.00
2019 July Quarterly	\$12,130.90	\$11,200.00
2019 Year End	\$5,651.92	\$5,600.00
Total	\$124,498.02	\$123,800.00

Daines Big Sky Committee

Report	Transfers	Memo Entries
2019 July Quarterly	\$15,500.00	\$0.00
2019 October	\$17,668.00	\$23,700.00
2019 Year End	\$9,400.00	\$12,300.00
Total	\$42,568.00	\$36,000.00

Freedom Works Victory

Report	Transfers	Memo Entries
2019 July Quarterly	\$21,474.91	\$0.00
Total	\$21,474.91	\$0.00

Senate Conservative Fund

Report	Transfers	Memo Entries
2019 Year End	\$12,200.00	\$0.00
Total	\$12,200.00	\$0.00

White Fish Victory

Report	Transfers	Memo Entries
2019 October Quarterly	\$16,028.37	\$8,080.00
Total	\$16,028.37	\$8,080.00