



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 11, 2018

RYAN ZYNDA, TREASURER
BOLD CONSERVATIVES PAC
P.O. BOX 7601 PMB 28772
WASHINGTON, DC 20044

Response Due Date
04/16/2018

IDENTIFICATION NUMBER: C00631382

REFERENCE: YEAR-END REPORT (07/01/2017 - 12/31/2017)

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 6 item(s):

1. The totals listed on Line(s) 6(c), 7, 15, 19, 20, 28(a), 28(d), 31, and 32, Column B of the Summary and Detailed Summary Page(s) 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. Your calculations for Line 8 appear to be incorrect. Cash on hand at the close of the current reporting period should always equal the closing calendar year to date cash on hand amount. Please provide the corrected total on the Summary Page. (52 U.S.C. §30104(b) (formerly 2 U.S.C. § 434(b)))
3. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer name and occupation entries appear on your report and

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are not considered acceptable: "ACM / Mgr," "Ban Mechael MD PC / Ban Mechael MD PC," "Pegasus P / Self Emp," "Self / Heary Equip," and "Self / Self Employed."

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

4. 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): "Agency Fee," "Back-End Cost," and "Mailhouse/Laser." For further guidance regarding acceptable

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purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at <https://www.fec.gov/help-candidates-and-committees/purposes-disbursement>

5. Schedule B of your report discloses reimbursements to individuals for "Expenses Repayment." Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information and clearly identify on the Schedule B, which reimbursement each memo entry relates to. If itemization is not necessary, you must indicate so in an amendment to this report. 11 CFR §§104.3(b)(3)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3

6. Your report discloses debts with outstanding beginning balances that do not equal the corresponding closing balances of your previous report (see attached). These amounts should be the same. Please 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)

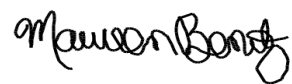
Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions 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) 694-1147.

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Sincerely,

A handwritten signature in black ink that reads "Maureen Benitz". The signature is written in a cursive, flowing style.

Maureen Benitz
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

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Debts with Balance Discrepancies
BOLD CONSERVATIVES PAC (C00631382)

Name	Closing Balance [Previous Report]	Opening Balance [Current Report]
Bobbleheads.com LLC	\$6,000.00	\$0.00
Daly, Jack W	\$1,000.00	\$0.00
Daly, Jack W	\$2,000.00	\$0.00
Daly, Jack W	\$300.00	\$0.00
Daly, Kay R	\$500.00	\$0.00
Daly, Kay R	\$500.00	\$0.00
Daly, Kay R	\$545.00	\$0.00
Daly, Kay R	\$500.00	\$0.00
Politechs, Inc.	\$5,000.00	\$0.00
Right Country Lists	\$1,500.00	\$0.00
Viguerie Political Lists	\$948.00	\$0.00
Zip Mailing Services	\$1,757.00	\$0.00