

RECEIVED  
FEC MAIL CENTER  
2015 DEC 15 AM 10:33

December 14, 2015

VIA OVERNIGHT DELIVERY

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463  
Reports Analysis Division  
Attn: Joshua Rebollozo, Campaign Finance Analyst  
Tel: 202-694-1172

**Re:** The Center; FEC Identification Number: C00488585

Dear Mr. Rebollozo,

Reference is made to your letter dated November 11, 2015 (a copied of which is attached here). Enclosed is an amended mid-year campaign finance report (01/01/2015-06/30/2015) for the Center, addressing the items noted in your letter.

Your letter is correct in stating that the Center is not a non-multicandidate political committee, and therefore, the \$10,000 contribution to Bob Casey for Senate, Inc., exceeded the per-election contribution limit for a non-multicandidate committee. We realized our error shortly after the contribution was made, and obtained a partial refund from Bob Casey for Senate, Inc. in the amount of \$4,600.00. I had initially intended to have the refunded reflected in the year-end report, but it is now indicated in the attached amended report, along with a copy of the refund check and accompanying letter from Bob Casey for Senate, Inc.

I believe that all items are now in order, but if any issues remain unresolved based on your review of the amended report, please do not hesitate to contact me at (215) 575-7144 with any questions.

Best regards,

A handwritten signature in black ink, appearing to read 'Alex Braden', is written over the typed name.

Alex Braden  
Treasurer

Enclosures



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

November 11, 2015

ALEX BRADEN, TREASURER  
THE CENTER  
1500 MARKET STREET SUITE 3500E  
PHILADELPHIA, PA 19102

**Response Due Date**

**12/16/2015**

IDENTIFICATION NUMBER: C00488585

REFERENCE: MID-YEAR REPORT (01/01/2015 - 06/30/2015)

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. For your report to be considered complete, it must include a Detailed Summary Page. Please provide the missing Detailed Summary Page for this report. (52 U.S.C. §30104(b) (formerly 2 U.S.C. §434(b)) and 11 CFR §104.3(c))
2. Please provide the amounts for Line 6, Columns A and B of the Summary Page and amend your report and any subsequent reports that may be affected by this correction. (52 U.S.C. §30104(b) (formerly 2 U.S.C. §434(b)))
3. Your calculations for Line 32, Columns A and B appear to be incorrect. Please provide the correct totals on the Detailed Summary Page. (52 U.S.C. §30104(b) (formerly 2 U.S.C. §434(b)(7)))
4. Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. Please be advised that 52 U.S.C. §30116(a) (formerly 2 U.S.C. §441a(a)) prohibits a non-multicandidate political committee and its affiliates, from making a contribution to a candidate for federal office in excess of \$2,700 per election. Please refer to the Campaign Guide for information on how a committee qualifies for multicandidate status.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying

201511110300007624

CENTER; THE

Page 2 of 3

information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

If your committee has met the criteria for multicandidate status, please file FEC FORM 1M "Notification of Multicandidate Status" with the Commission. The treasurer must file FEC FORM 1M no later than ten (10) calendar days after qualifying for multicandidate committee status. (11 CFR §102.2(a)(3))

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration. (11 CFR §103.3(b)(1) and (3))

- Schedule B supporting Line 23 discloses a contribution to "Bob Casey for Senate" which is designated to both the primary and general elections. Please be advised, it is in your committee's interest to designate the appropriate amount which should be attributed to each election in order to avoid the appearance of an excessive contribution to a federal candidate. Please amend your report to clarify the amount attributable for each election designated for this contribution.

**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

201511110300007625



**Excessive Contributions  
THE CENTER (C00488585)**

**Excessive Contributions to a Candidate Committee**

<b>Recipient Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>	<b>Report</b>
BOB CASEY FOR SENATE	6/23/15	\$10,000.00	*P2016/G2016	2015 Mid-Year

\*Schedule B supporting Line 23 discloses this contribution as designated to both the primary and general elections.

NON-FINANCIAL DISCLOSURE

**FEC FORM 3X**

**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For Other Than An Authorized Committee

RECEIVED  
FEC MAIL CENTER  
2015 DEC 15 AM 10:33

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

THE CENTER

ADDRESS (number and street) 1500 MARKET STREET

Check if different than previously reported. (ACC) SUITE 3500E

PHILADELPHIA PA 19102

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

C00488585

3. IS THIS REPORT  NEW (N) OR  AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Year-End Report (YE)
- July 31 Mid-Year Report (Non-election Year Only) (MY)
- Termination Report (TER)

- (b) Monthly Report Due On:
- |                                      |                                      |                                       |  |
|--------------------------------------|--------------------------------------|---------------------------------------|--|
| <input type="checkbox"/> Feb 20 (M2) | <input type="checkbox"/> May 20 (M5) | <input type="checkbox"/> Aug 20 (M8)  | <input type="checkbox"/> Nov 20 (M11) (Non-Election Year Only) |
| <input type="checkbox"/> Mar 20 (M3) | <input type="checkbox"/> Jun 20 (M6) | <input type="checkbox"/> Sep 20 (M9)  | <input type="checkbox"/> Dec 20 (M12) (Non-Election Year Only) |
| <input type="checkbox"/> Apr 20 (M4) | <input type="checkbox"/> Jul 20 (M7) | <input type="checkbox"/> Oct 20 (M10) | <input type="checkbox"/> Jan 31 (YE)                           |

- (c) 12-Day PRE-Election Report for the:
- |   |  |                                       |
|---|--|---------------------------------------|
| <input type="checkbox"/> Primary (12P)    | <input type="checkbox"/> General (12G) | <input type="checkbox"/> Runoff (12R) |
| <input type="checkbox"/> Convention (12C) | <input type="checkbox"/> Special (12S) |                                       |

Election on MM / DD / YYYYYY in the State of   

- (d) 30-Day POST-Election Report for the:
- |  |                                       |  |
|--|---------------------------------------|--|
| <input type="checkbox"/> General (30G) | <input type="checkbox"/> Runoff (30R) | <input type="checkbox"/> Special (30S) |
|--|---------------------------------------|--|

Election on MM / DD / YYYYYY in the State of   

5. Covering Period MM / DD / YYYYYY through MM / DD / YYYYYY

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer ALEX BRADEN

Signature of Treasurer *Alex Braden* Date MM / DD / YYYYYY

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

Office Use Only									
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**FEC FORM 3X**  
Rev. 12/2004

**SUMMARY PAGE  
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

THE CENTER

Report Covering the Period: From:  /  /  To:  /  /

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, <input type="text" value="2015"/>		<input type="text" value="4144308"/>
(b) Cash on Hand at Beginning of Reporting Period.....	<input type="text" value="4144308"/>	
(c) Total Receipts (from Line 19).....	<input type="text" value="460000"/>	<input type="text" value="460000"/>
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	<input type="text" value="4604308"/>	<input type="text" value="4604308"/>
7. Total Disbursements (from Line 31).....	<input type="text" value="1760000"/>	<input type="text" value="1760000"/>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)).....	<input type="text" value="2844308"/>	<input type="text" value="2844308"/>
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D).....	<input type="text" value=""/>	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D).....	<input type="text" value=""/>	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

**For further information contact:**

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463  
  
Toll Free 800-424-9530  
Local 202-694-1100

**DETAILED SUMMARY PAGE**  
of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

THE CENTER

Report Covering the Period: From:

MM / DD / YYYY  
01 / 01 / 2015

To:

MM / DD / YYYY  
06 / 30 / 2015

**I. Receipts**

**COLUMN A**  
Total This Period

**COLUMN B**  
Calendar Year-to-Date

11. Contributions (other than loans) From:

(a) Individuals/Persons Other Than Political Committees

(i) Itemized (use Schedule A).....

(ii) Unitemized.....

(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶

(b) Political Party Committees.....

(c) Other Political Committees (such as PACs).....

(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶

12. Transfers From Affiliated/Other Party Committees.....

13. All Loans Received.....

14. Loan Repayments Received.....

15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....

16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....

17. Other Federal Receipts (Dividends, Interest, etc.).....

18. Transfers from Non-Federal and Levin Funds

(a) Non-Federal Account (from Schedule H3).....

(b) Levin Funds (from Schedule H5).....

(c) Total Transfers (add 18(a) and 18(b))..

19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶

20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....		
(ii) Unitemized.....		
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶		
(b) Political Party Committees.....		
(c) Other Political Committees (such as PACs).....		
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶		
12. Transfers From Affiliated/Other Party Committees.....		
13. All Loans Received.....		
14. Loan Repayments Received.....		
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....		
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	4,600.00	4,600.00
17. Other Federal Receipts (Dividends, Interest, etc.).....		
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....		
(b) Levin Funds (from Schedule H5).....		
(c) Total Transfers (add 18(a) and 18(b))..		
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	4,600.00	4,600.00
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	4,600.00	4,600.00

NON-FEDERAL AND LEVIN FUNDS



**DETAILED SUMMARY PAGE**  
of Disbursements

**II. Disbursements**

**COLUMN A**  
Total This Period

**COLUMN B**  
Calendar Year-to-Date

21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share .....		
(ii) Non-Federal Share .....		
(b) Other Federal Operating Expenditures .....		
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b)) .....		
22. Transfers to Affiliated/Other Party Committees .....		
23. Contributions to Federal Candidates/Committees and Other Political Committees .....	12,600.00	12,600.00
24. Independent Expenditures (use Schedule E) .....		
25. Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F) .....		
26. Loan Repayments Made .....		
27. Loans Made .....		
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees .....		
(b) Political Party Committees .....		
(c) Other Political Committees (such as PACs) .....		
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)) .....		
29. Other Disbursements .....	5,000.00	5,000.00
30. Federal Election Activity (52 U.S.C. § 30101(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share .....		
(ii) "Levin" Share .....		
(b) Federal Election Activity Paid Entirely With Federal Funds .....		
(c) Total Federal Election Activity (add .. Lines 30(a)(i), 30(a)(ii) and 30(b)) .....		
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) ..	17,600.00	17,600.00
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31) .....	17,600.00	17,600.00

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**DETAILED SUMMARY PAGE**  
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

**III. Net Contributions/Operating Expenditures**

**COLUMN A**  
Total This Period

**COLUMN B**  
Calendar Year-to-Date

33. Total Contributions (other than loans) (from Line 11(d), page 3) .....		
34. Total Contribution Refunds (from Line 28(d)) .....		
35. Net Contributions (other than loans) (subtract Line 34 from Line 33) .....		
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b)) .....		
37. Offsets to Operating Expenditures (from Line 15, page 3) .....		
38. Net Operating Expenditures (subtract Line 37 from Line 36) .....		

NON-FINANCIAL INFORMATION

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER: (check only one)

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 17
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

**THE CENTER**

Full Name (Last, First, Middle Initial)

**A. Bob Casey For Senate Inc.**

Mailing Address

P.O. Box 58746

City

PHILADELPHIA

State

PA

Zip Code

19102

FEC ID number of contributing federal political committee.

000431056

Name of Employer

N/A

Occupation

N/A

Receipt For:

Primary  General  
 Other (specify) ▼

Aggregate Year-to-Date ▼

REFUND OF EXCESS CONTRIBUTION

Date of Receipt

07 / 09 / 2015

Amount of Each Receipt this Period

4600.00

**B.**

Full Name (Last, First, Middle Initial)

Mailing Address

City

State

Zip Code

FEC ID number of contributing federal political committee.

C

Name of Employer

Occupation

Receipt For:

Primary  General  
 Other (specify) ▼

Aggregate Year-to-Date ▼

Date of Receipt

Amount of Each Receipt this Period

**C.**

Full Name (Last, First, Middle Initial)

Mailing Address

City

State

Zip Code

FEC ID number of contributing federal political committee.

C

Name of Employer

Occupation

Receipt For:

Primary  General  
 Other (specify) ▼

Aggregate Year-to-Date ▼

Date of Receipt

Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional).....▶

TOTAL This Period (last page this line number only).....▶

4600.00

20150709 10:00:00 AM

**SCHEDULE B (FEC Form 3X)  
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE 1 OF 1				
	<input type="checkbox"/> 21b <input type="checkbox"/> 27	<input type="checkbox"/> 22 <input type="checkbox"/> 28a	<input type="checkbox"/> 23 <input type="checkbox"/> 28b	<input type="checkbox"/> 24 <input type="checkbox"/> 28c	<input type="checkbox"/> 25 <input type="checkbox"/> 29	<input type="checkbox"/> 26 <input type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)  
**THE CENTER**

**A. HILLARY CLINTON FOR AMERICA**

Full Name (Last, First, Middle Initial)

Mailing Address: **P.O. Box 1367**

City: **New York** State: **NY** Zip Code: **10185-1367**

Purpose of Disbursement: **CAMPAIGN CONTRIBUTION**

Candidate Name: **HILLARY CLINTON**

Office Sought:  House  Senate  President

Disbursement For:  Primary  General  Other (specify) ▼

State: \_\_\_\_\_ District: \_\_\_\_\_

Date of Disbursement: **04 / 21 / 2015**

Amount of Each Disbursement this Period: **2600.00**

**B. BOB CASEY FOR SENATE INC.**

Full Name (Last, First, Middle Initial)

Mailing Address: **P.O. Box 58746**

City: **PHILADELPHIA** State: **PA** Zip Code: **19102**

Purpose of Disbursement: **CAMPAIGN CONTRIBUTION**

Candidate Name: **BOB CASEY**

Office Sought:  House  Senate  President

Disbursement For:  Primary  General  Other (specify) ▼

State: **PA** District: \_\_\_\_\_

Date of Disbursement: \_\_\_\_\_

Amount of Each Disbursement this Period: **10000.00**

**C. ANTHONY HARDY WILLIAMS FOR MAYOR**

Full Name (Last, First, Middle Initial)

Mailing Address: **P.O. Box 34845**

City: **PHILADELPHIA** State: **PA** Zip Code: **19101**

Purpose of Disbursement: **CAMPAIGN CONTRIBUTION**

Candidate Name: **ANTHONY HARDY WILLIAMS**

Office Sought: **MAYOR**  House  Senate  President

Disbursement For:  Primary  General  Other (specify) ▼

State: **PA** District: \_\_\_\_\_

Date of Disbursement: **03 / 25 / 2015**

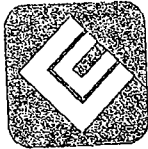
Amount of Each Disbursement this Period: **5000.00**

**SUBTOTAL** of Disbursements This Page (optional).....

**TOTAL** This Period (last page this line number only).....

**17600.00**

2015 RELEASE UNDER E.O. 13526



THE CAMPAIGN COMPLIANCE FIRM, LLC.

July 9, 2015

The Center  
Attn: Ajay Raju  
1650 Market Street  
Philadelphia, PA 19103

To Whom It May Concern:

Thank you for your contribution to Bob Casey for Senate on 6/30/2015 in the amount of \$10,000.

At the time of your contribution, The Center, was not registered with the Federal Election Commission as a qualified multi-candidate committee, and therefore is limited to contributions of \$2,700 per election to candidates seeking federal office.

As Bob Casey for Senate is only permitted to accept a total of \$5,400 from your committee (\$2,700 for the 2018 Primary and \$2,700 for the 2018 General Elections), please find enclosed check number 2365 in the amount of \$4,600.00 as a refund of the excess contribution.

Thank you again for your generous contribution, and please don't hesitate to call if you have any additional questions.

In service,

*A. Montgomery*

**BOB CASEY FOR SENATE, INC.**  
P. O. BOX 58746  
PHILADELPHIA, PA 19102-8746

PNC Bank, N.A. 020

2373

3-5/310  
670

August 3, 2015

PAY TO THE  
ORDER OF

**The Center**

\$4,600.00

Four Thousand Six Hundred and 00/100

DOLLARS

MEMO

Refund of Excess Contribution

*A. Montgomery*  
AUTHORIZED SIGNATURE

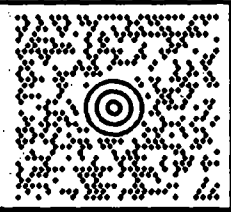
Details on Back Security Features Included

2015 DEC 15

LAUREN A. CRANMER  
215-575-7170 7170  
DILWORTH PAXSON - PHILADELPHIA  
1500 MARKET STREET  
PHILADELPHIA PA 19102

0.0 LBS LTR 1 OF 1

SHIP TO:  
JOSHUA REBOLLOZO  
202-694-1172  
FEDERAL ELECTION COMMISSION  
REPORTS ANALYSIS DIVISION  
999 E STREET, NW  
WASHINGTON DC 20463-0001



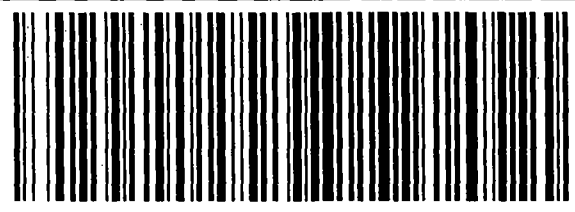
MD 201 9-83



UPS NEXT DAY AIR

TRACKING #: 1Z V69 50R 01 9057 0188

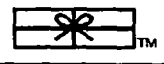
1



BILLING: P/P

Client/Matter: 99940/00000  
Attorney Name: Alex Braden

CS 17.6.06. WNTNVS0 69.0A 10/2015



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UPS 2nd Day Air®

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under window from the top.

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- Standard
- 2nd Day Select®
- Expedited®

X-RAYED BY FEC SECURITY

Serving you for more than 100 years  
United Parcel Service.



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