



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2845

DATE SCANNED 5/11/15

SCANNER NO. 2

SCAN OPERATOR JB



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2014 DEC 10 AM 10:54

December 9, 2014

MEMORANDUM

SENSITIVE

TO: The Commission

THROUGH: Alec Palmer *APCO*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Debbie Chacona *DC/mic*
Assistant Staff Director
Reports Analysis Division

BY: Kristin D. Roser/Sari Pickeral *KDP*
Reports Analysis Division
Compliance Branch

SUBJECT: Reason To Believe Recommendation – 2014 October Quarterly Report (Non-Election Sensitive) for the Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2014 October Quarterly Report in accordance with 52 U.S.C. § 30104(a) (formerly 2 U.S.C. 434(a)). The 2014 October Quarterly Report was due on October 15, 2014.

The committees listed in the attached RTB Circulation Report either failed to file the report, no more than thirty (30) days after the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 CFR 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

Recommendation

- 1.
2. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
3. Send the appropriate letters.

Federal Election Commission
Reason to Believe Circulation Report
2014 OCTOBER QUARTERLY Not Election Sensitive 10/15/2014 H_S_P_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2845	C00556555	BARBARA MULVANEY FOR CONGRESS	MULVANEY, BARBARA	JANA MULVANEY	\$301,016	0		Not Filed	\$9,803	\$330

2848	C00543173	CORRY WESTBROOK FOR CONGRESS	WESTBROOK, CORRY	CATHERINE E. WFN7ING	\$333,044	0		Not Filed	\$66,609 (est)	\$2,970
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2853	C00550665	FRIENDS OF TERRY ADAMS	ADAMS, TERRY GLEN JR	ROBERT D. TUKE	\$193,468	0		Not Filed	\$48,367 (est)	\$1,090
2854	C00555631	HIRFS FOR CONGRESS	HIRFS, REVERLY JOY	ROY WILLIY	\$194,087	0	11/8/2014	24	\$51,933	\$2,550

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reason To Believe Recommendation –)
2014 October Quarterly Report (Non-)
Election Sensitive) for the Administrative)
Fine Program:)
BARBARA MULVANEY FOR) AF# 2845
CONGRESS, and JANA MULVANEY as)
treasurer;)

CORRY WESTBROOK FOR CONGRESS,) AF# 2848
and CATHERINE E. WENZING as)
treasurer;)

FRIENDS OF TERRY ADAMS, and) AF# 2853
ROBERT D TUKE as treasurer;)
HIRES FOR CONGRESS, and ROY) AF# 2854
WILEY as treasurer;)

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on December 11, 2014 the Commission took the following actions on the Reason To Believe Recommendation – 2014 October Quarterly Report (Non-Election Sensitive) for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated December 09, 2014, on the following committees:

AF#2845 Decided by a vote of 6-0 to: (1) find reason to believe that BARBARA MULVANEY FOR CONGRESS, and JANA MULVANEY as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2848 Decided by a vote of 6-0 to: (1) find reason to believe that CORRY WESTBROOK FOR CONGRESS, and CATHERINE E. WENZING as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2853 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF TERRY ADAMS, and ROBERT D TUKE as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

Federal Election Commission
Certification for Administrative Fines
December 11, 2014

Page 4

AF#2854 Decided by a vote of 6-0 to: (1) find reason to believe that HIRES FOR CONGRESS, and ROY WILEY as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

11/12/2014 10:00 AM


Federal Election Commission
Certification for Administrative Fines
December 11, 2014

Page 5

15062102770

THE CONVENT

Attest:


Shawn Woodhead Werth
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 12, 2014

Jana Mulvaney, in official capacity as Treasurer
Barbara Mulvaney for Congress
P.O. Box 1293
Venice, CA 90291

C00556555
AF#: 2845

Dear Ms. Mulvaney:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file an October Quarterly Report of Receipts and Disbursements every calendar year. This report, covering the period July 1, 2014 through September 30, 2014, shall be filed no later than October 15, 2014. 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)). Records at the Federal Election Commission ("FEC") indicate that this report was not filed within thirty (30) days of the due date. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)). 52 U.S.C. § 30109(a)(4) (formerly 2 U.S.C. § 437g(a)(4)). On December 11, 2014, the FEC found that there is reason to believe ("RTB") that Barbara Mulvaney for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) by failing to file timely this report on or before October 15, 2014. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$330. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$330 is due within forty (40) days of the finding, or by January 20, 2015, and is based on these factors:

Sensitivity of Report: Not Election Sensitive
Level of Activity: \$9,803
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found at the top of page 1 under your

committee's identification number, to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must be received within forty (40) days of the Commission's RTB finding, or January 20, 2015. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. district court under 52 U.S.C. § 30109 (formerly 2 U.S.C. § 437g). 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Barbara Mulvaney for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate

action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

5. Settlement Offers

If you make a payment in an amount less than the calculated civil money penalty as an offer to settle or compromise a debt owed to the Commission, the offer is herewith rejected despite any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2) (formerly 2 U.S.C. § 437g(a)(2)). It will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) (formerly 2 U.S.C. § 437g(a)(4)(B)) and 30109(a)(12)(A) (formerly 437g(a)(12)(A)) until it is placed on the public record in accordance with 11 CFR § 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Sari Pickerall in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Lee E. Goodman
Chairman

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$330 for the 2014 October Quarterly Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission
P.O. Box 979058
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

The remittance and your payment are due by January 20, 2015. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Barbara Mulvaney for Congress

FEC ID#: C00556555

AF#: 2845

PAYMENT DUE DATE: January 20, 2015

PAYMENT AMOUNT DUE: \$330

Barbara Mulvaney
11451 West Rd
Potter Valley, Ca 95469
310 220 9535

RECEIVED
THE SECRETARY OF THE
U.S. MAIL CENTER

Re: Barbara Mulvaney for Congress
FEC # C00556555
AF# 2845
Request for Reconsideration

13 Jan 2015

Dear Mr Goodman:

I have been assessed with a fine because our October filing was submitted in hardcopy instead of an electronic copy. I respectfully request that the fine be waived because of extenuating circumstances. I am the candidate and the only staff. The campaign staff left after the June primary and I have moved to a very rural area in Northern California where the internet is sporadic. The access to the computer program that generated the reports has been off for months, which is why the report was filed in hardcopy form in October. I apologize for my lack of understanding that we were required to file electronically. I have called in and spoken to Bradley Mathieson and David Garr about the situation and they instructed me to send in a new hard copy of the October F 3 that is clearer - the previous one was dark and hard to read. I am enclosing that with this letter. I was also told I could file an F 3 in hardcopy to terminate the account. That F 3 is also included in this package.

The activity in the bank account and on the campaign has been next to nothing since June. I hope that it is within your purview to grant my request for reconsideration on the fine. I am currently in debt and unemployed - so every small kindness adds a smile to my day.

If I have failed to answer or address an issue - please let me know before your final decision.

Thank you!

Barbara

ENCLOSURES

1. F-3 - October
2. F-3 - Dec.
3. Forgiveness letter.

RECEIVED
JAN 20 1964
EC MAIL CENTER

20 MAIL CENTER

I, Barbara Mulvaney, hereby forgive the Barbara Mulvaney for Congress Committee (Committee) for the loans I have given the committee in 2014 in the amount of \$121,863.55. This amount represents the total amount that I have loaned the Committee.

13 January 2015

FEC FORM 3

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee

RECEIVED

Office Use Only

1. NAME OF
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type
over the lines.

2015 JAN 20 AM 11:44
12FE4M5
FEC MAIL CENTER

BARBARA MULVANEY for Congress

ADDRESS (number and street)

11451 WEST RD

Check if different
than previously
reported. (ACC)

POTTER Valley

CA

95469

CITY ▲

STATE ▲

ZIP CODE ▲

FEC IDENTIFICATION NUMBER ▼

00556555

3. IS THIS
REPORT

NEW
(N) OR

AMENDED
(A)

STATE ▼ DISTRICT

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)

X Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

M M / D D / Y Y Y Y

in the
State of

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

M M / D D / Y Y Y Y

in the
State of

5. Covering Period

09 30 2014

through

12 31 2014

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

BARBARA MULVANEY

Signature of Treasurer



Date

01 13 2015

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

FEC FORM 3
(Revised 02/2003)

SUMMARY PAGE
of Receipts and Disbursements

FEC Form 3 (Revised 02/2003)

Page 2

Write or Type Committee Name

BARBARA MULVANEY for Congress

Report Covering the Period: From:

00 00 2014

To:

12 31 2014

	COLUMN A This Period	COLUMN B Election Cycle-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	0	0
(b) Total Contribution Refunds (from Line 20(d))	0	0
(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a))	0	0
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	438.00	438.00
(b) Total Offsets to Operating Expenditures (from Line 14)	0	0
(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a))	438.00	438.00
8. Cash on Hand at Close of Reporting Period (from Line 27)	0	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	0	

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

Page 3

Barbara Mulvaney for Congress

Report Covering the Period: From: ^{M M' D D' Y Y Y Y} 1 0 0 1 2 0 1 4 To: ^{M M' D D' Y Y Y Y} 1 2 3 1 2 0 1 4

I. RECEIPTS		COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)		0	0
(ii) Unitemized		0	0
(iii) TOTAL of contributions from individuals		0	0
(b) Political Party Committees			
(c) Other Political Committees (such as PACs)		0	0
(d) The Candidate			
(e) TOTAL CONTRIBUTIONS (other than loans) (add Lines 11(a)(iii), (b), (c), and (d))..		0	0
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES			
13. LOANS:			
(a) Made or Guaranteed by the Candidate			
(b) All Other Loans		0	0
(c) TOTAL LOANS (add Lines 13(a) and (b))		0	0
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			
15. OTHER RECEIPTS (Dividends, Interest, etc.)			
16. TOTAL RECEIPTS (add Lines 11(e), 12, 13(c), 14, and 15) (Carry Total to Line 24, page 4)			

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3 (Revised 02/2003)

Page 4

II. DISBURSEMENTS

COLUMN A
Total This Period

COLUMN B
Election Cycle-to-Date

17. OPERATING EXPENDITURES.....	, 438.00	, 438.00
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	, 0	, 0
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate.....		1,386.45
(b) Of All Other Loans		0
(c) TOTAL LOAN REPAYMENTS (add Lines 19(a) and (b)).....		1,386.45
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		0
(b) Political Party Committees.....		0
(c) Other Political Committees (such as PACs)		0
(d) TOTAL CONTRIBUTION REFUNDS (add Lines 20(a), (b), and (c)).....		0
21. OTHER DISBURSEMENTS		0
22. TOTAL DISBURSEMENTS (add Lines 17, 18, 19(c), 20(d), and 21) ►		1,824.45

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD.....	1,824.45
24. TOTAL RECEIPTS THIS PERIOD (from Line 16, page 3).....	0
25. SUBTOTAL (add Line 23 and Line 24).....	1,824.45
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22).....	1,824.45
27. CASH ON HAND AT CLOSE OF REPORTING PERIOD (subtract Line 26 from Line 25).....	0

Duplicate -
Except for address change.

**FEC
FORM 3**

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

RECEIVED

2015 JAN 23 10:44 AM

1. NAME OF
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type
over the lines.

12 FEB 4 2015
FEC MAIL CENTER

BARBARA MULIVANEY FOR CONGRESS

ADDRESS (number and street)

11451 WEST RD

POTTER VALLEY

POTTER VALLEY

KA

195469-1

CITY ▲

STATE ▲

ZIP CODE ▲

FEC IDENTIFICATION NUMBER ▼

000556555

3. IS THIS
REPORT

NEW
(N) OR

✓ AMENDED
(A)

STATE ▼ DISTRICT

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)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

M M / D D / Y Y Y Y

in the
State of

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

M M / D D / Y Y Y Y

in the
State of

5. Covering Period

07 01 2014

through

09 30 2014

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

BARBARA MULIVANEY

Signature of Treasurer

Date

12 01 2015

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

FEC FORM 3
(Revised 02/2003)

SUMMARY PAGE
of Receipts and Disbursements

FEC Form 3 (Revised 02/2003)

Page 2

Write or Type Committee Name

Report Covering the Period:

From:

07 / 01 / 2014

To:

09 / 30 / 2014

	COLUMN A This Period	COLUMN B Election Cycle-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))....	0	0
(b) Total Contribution Refunds (from Line 20(d))	0	0
(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a)).....	0	0
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	786.18	1,979.08
(b) Total Offsets to Operating Expenditures (from Line 14).....	5,017.15	5,259.91
(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a)).....	4,230.97	4,630.17
8. Cash on Hand at Close of Reporting Period (from Line 27).....	1,824.45	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	124,250.00	

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

Write or Type Committee Name

Report Covering the Period:

From:

07 01 2014

To:

09 30 20 14

I. RECEIPTS

COLUMN A
Total This Period

COLUMN B
Election Cycle-to-Date

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

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

(ii) Unitemized

(iii) TOTAL of contributions
from individuals

(b) Political Party Committees.....

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

(d) The Candidate

(e) **TOTAL CONTRIBUTIONS**
(other than loans)
(add Lines 11(a)(iii), (b), (c), and (d))..

12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES

13. LOANS:

(a) **Made or Guaranteed by the Candidate.....**

(b) All Other Loans.....

(c) **TOTAL LOANS**
(add Lines 13(a) and (b)).....

14. OFFSETS TO OPERATING EXPENDITURES
(Refunds, Rebates, etc.)

15. OTHER RECEIPTS
(Dividends, interest, etc.)

16. TOTAL RECEIPTS (add Lines 11(e), 12, 13(c), 14, and 15)
(Carry Total to Line 24, page 4).....

[illegible]

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3 (Revised 02/2003)

Page 4

II. DISBURSEMENTS

COLUMN A
Total This Period

COLUMN B
Election Cycle-to-Date

17. OPERATING EXPENDITURES.....	, 786.18	, 5,979.08
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	, . 0	, . 0
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate.....	, 4,000.00	, 4,000.00
(b) Of All Other Loans	, . 0	, . 0
(c) TOTAL LOAN REPAYMENTS (add Lines 19(a) and (b)).....	, 4,000.00	, 4,000.00
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	, . 0	, . 0
(b) Political Party Committees.....	, . 0	, . 0
(c) Other Political Committees (such as PACs)	, . 0	, . 0
(d) TOTAL CONTRIBUTION REFUNDS (add Lines 20(a), (b), and (c)).....	, . 0	, . 0
21. OTHER DISBURSEMENTS	, . 0	, . 0
22. TOTAL DISBURSEMENTS (add Lines 17, 18, 19(c), 20(d), and 21) ►	, 4,786.18	, 5,979.08

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD.....	, 1,593.11
24. TOTAL RECEIPTS THIS PERIOD (from Line 16, page 3).....	, 5,017.52
25. SUBTOTAL (add Line 23 and Line 24).....	, 6,610.63
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22).....	, 4,786.18
27. CASH ON HAND AT CLOSE OF REPORTING PERIOD (subtract Line 26 from Line 25).....	, 1,824.45



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 20, 2015

Barbara Mulvaney, Candidate
Barbara Mulvaney for Congress
11451 West Road
Potter Valley, CA 95469

C00556555
AF#: 2845

Dear Ms. Mulvaney,

On January 20, 2015, the Commission's Office of Administrative Review ("OAR") received your written response ("challenge") for Barbara Mulvaney for Congress and Jana Mulvaney, in her official capacity as Treasurer, which is being reviewed by OAR. If you have any questions regarding your challenge, please contact this Office on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

Sincerely, .:

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

Rhiannon Magruder
Reviewing Officer
Office of Administrative Review



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEB 12 2014
FEB 12 2014 12:23

February 12, 2014

MEMORANDUM

SENSITIVE

To: The Commission

Through: Alec Palmer *AP*
Staff Director

From: Patricia C. Orrock *PCO*
Chief Compliance Officer

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Subject: Reviewing Officer Recommendation in AF# 2845 – Barbara Mulvaney for
Congress and Jana Mulvaney, in her official capacity as Treasurer (C00556555)

The attached Reviewing Officer Recommendation is being circulated on an informational basis. A copy was also sent to the respondents in accordance with 11 C.F.R. § 111.36(f). The respondents may file with the Commission Secretary a written response within 10 days of transmittal of the recommendation. After the 10 day period, the Reviewing Officer Recommendation and the respondents' written response, if any, will be circulated to the Commission to make a final determination.

Please note, the Committee is eligible to terminate once this matter is closed.

Attachment



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 12, 2015

**REVIEWING OFFICER RECOMMENDATION
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 2845 – Barbara Mulvaney for Congress and Jana Mulvaney, in her official capacity as Treasurer (C00556555)

Summary of Recommendation

Make a final determination that the respondents violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a \$330 civil money penalty.

Reason-to-Believe Background

The 2014 October Quarterly Report was due on October 15, 2014. The respondents filed a paper version of the 2014 October Quarterly Report on October 15, 2014. The report was required to be in an electronic format, thus it was considered not filed at the time of the RTB finding. 52 U.S.C. § 30104(a)(11) (formerly 2 U.S.C. § 434(a)(11)) and 11 C.F.R. § 104.18(a). The report is not election sensitive and has not yet been electronically filed; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1).

On December 11, 2014, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) for failing to timely file the 2014 October Quarterly Report and made a preliminary determination that the civil money penalty was \$330 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was mailed to the respondents' address of record from the Reports Analysis Division ("RAD") on December 12, 2014 to notify them of the Commission's RTB finding and civil money penalty. The RTB Letter was remailed to an alternate address on December 23, 2014 and successfully delivered on December 24, 2014.

Legal Requirements

The Federal Election Campaign Act ("Act") states that the treasurer of a principal campaign committee shall file a report for the quarter ending September 30 no later than October 15. 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and 11 C.F.R. § 104.5(a)(1)(i). Political committees required to file reports with the Commission must file in an electronic format if they have received contributions or made expenditures or expect to receive contributions or make expenditures in a calendar year aggregating in excess of \$50,000. 52 U.S.C. § 30104(a)(11) (formerly 2 U.S.C. § 434(a)(11)) and 11 C.F.R. § 104.18(a). Reports electronically filed must be received and validated at or before 11:59 p.m. Eastern Standard/Daylight Time on the filing date to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

Respondents' Challenge

On January 20, 2015, the Commission received the written response ("challenge") from the Candidate requesting that the Commission waive the civil money penalty for extenuating circumstances. The Candidate states that all staff left the campaign after the June Primary Election, and she has since moved to a rural location "where the internet is sporadic." She further states: "The access to the computer program that generated the reports has been off for months, which is why the report was filed in hardcopy form in October. I apologize for my lack of understanding that we were required to file electronically." The Candidate concludes by stating there has been minimal campaign activity since June, 2014 and mentioning that she is currently in debt and unemployed.

As instructed by RAD Analysts, the Candidate included a legible paper copy of the 2014 October Quarterly Report, paper Termination Report, and candidate loan forgiveness letter with the challenge.

Analysis

Political committees required to file reports with the Commission must file in an electronic format if they have received contributions or made expenditures totaling over \$50,000 in a calendar year. 52 U.S.C. § 30104(a)(11) (formerly 2 U.S.C. § 434(a)(11)) and 11 C.F.R. § 104.18(a). Pages 83-84 of the Commission's *Campaign Guide for Congressional Candidates* explain the electronic filing requirements:

"...If a committee required to file electronically files a paper report instead of an electronic report, the report will be considered not filed...

...Campaign committees of House...candidates must file all reports and statements electronically if their total contributions or total expenditures exceed, or are expected to exceed, \$50,000 in a calendar year. 104.18(a). Once committees actually exceed the \$50,000 yearly threshold they have 'reason to expect to exceed' the threshold in the following two calendar years. 104.18(a)(3)(i). Consequently, committees must continue to file electronically for the next two calendar years (January through December)."

While 11 C.F.R. § 104.18(a)(3) provides for certain qualifying campaign committees to be exempt from the requirement to continue to electronically file for the following two calendar years, page 84 of the *Campaign Guide for Congressional Candidates* clarifies that "committees must finish filing electronically for the calendar year in which they exceeded the threshold."

The Committee crossed the mandatory electronic filing threshold with its first filed report, the 2014 April Quarterly Report. The Committee appropriately filed the 2014 April Quarterly, 12 Day Pre-Primary, and July Quarterly Reports in an electronic format. Because the Committee crossed the electronic filing threshold in 2014, it must electronically file for at least the remainder of 2014.

On October 15, 2014, the 2014 October Quarterly Report filing deadline, the Committee filed a paper version of the report covering the period of July 1 through September 30, 2014. According to the Manager of the Information Systems and Design Branch in the Commission's Office of the Chief Information Officer, the Electronic Filing Office ("EFO") sent a late notification email to "carmyn.egge@gmail.com," an email address previously provided by the Committee to EFO.¹ The email notified the Committee that it had failed to electronically file the 2014 October Quarterly Report.

On November 17, 2014, RAD notified the respondents that the paper version of the report was not considered filed and must be filed in an electronic format. The notification was sent via email to "barbara@barbaramulvaneyforcongress.com," the email address listed on the Committee's Statement of Organization.

According to RAD telecoms (written records of telephone conversation), on December 22, 2014, the Candidate contacted the RAD Compliance Analyst regarding the notice. The Candidate indicated that a campaign staff member had informed her that paper filings were acceptable. The Compliance Analyst confirmed that the Committee had crossed the mandatory electronic filing threshold, and thus was required to electronically file. During the conversation, the Candidate mentioned that the Committee was inactive. The Compliance Analyst explained the termination process and noted that RAD would accept a paper version of the Termination Report. He then advised the Candidate to contact her RAD Reviewing Analyst for further reporting assistance.

On January 5, 2015, the Candidate contacted the RAD Reviewing Analyst for assistance with terminating the Committee. The Reviewing Analyst confirmed that the Committee could file on paper if she intends to terminate the Committee. He also explained that the paper 2014 October Quarterly Report received on October 15, 2014 was illegible and requested that the Committee resubmit a legible copy. The Candidate asked if the fine for the 2014 October Quarterly Report would be waived once these paper reports were filed, and the Reviewing Analyst clarified that the fine was assessed because that report was required to be electronically filed at the time it was due.

On January 20, 2015, along with the challenge, the Committee submitted a legible paper copy of the 2014 October Quarterly Report and a paper Termination Report covering September 30 through December 31, 2014. As the RAD Analysts indicated in the previous telephone conversations, the paper reports were considered acceptable because the Committee made their intent to terminate official by filing the Termination Report.

At the time the 2014 October Quarterly Report was due, the Committee had not yet filed a Termination Report or otherwise indicated their intent to terminate. Therefore, the report was required to be timely filed in an electronic format pursuant to 52 U.S.C. § 30104(a)(11) (formerly 2 U.S.C. § 434(a)(11)) and 11 C.F.R. § 104.18(a). The fact that the paper filings received on January 20, 2015 have been accepted for the purpose of processing the respondents' termination request does not negate the respondents' requirement to timely file the 2014 October Quarterly Report in an electronic format.

¹ The Committee also provided EFO with an invalid email address, "adam@barbaramulvaneyforcongr."

THEODORE ROOSEVELT

OAR Recommendations

- 1) Adopt the Reviewing Officer recommendation for AF# 2845 involving Barbara Mulvaney for Congress and Jana Mulvaney, in her official capacity as Treasurer, in making the final determination;
- 2) Make a final determination in AF# 2845 that Barbara Mulvaney for Congress and Jana Mulvaney, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a \$330 civil money penalty; and
- 3) Send the appropriate letter.

Attachment 1 –
Attachment 2 – Pages 83-84 of *Campaign Guide for Congressional Candidates*
Attachment 3 –
Attachment 4 – Declaration from RAD
Attachment 5 – Declaration from OAR

Reporting Deadlines

Report Type	Covering	Due
Quarterly	January 1 — March 31 April 1 — June 30 July 1 — September 30 October 1 — December 31	April 15 July 15 October 15 January 31
Pre-Election (Both Pre-Primary and Pre-General as well as Pre-Runoff, if appropriate)	First day of the current reporting period through the 20th day before the election	12 days before the election
Post-General	First day of the current reporting period through the 20th day after the general election	30 days after the general election
48 Hour Notices (Reporting contributions of \$1,000 or more)	Contributions received less than 20 days but more than 48 hours before the election	Within 48 hours of receipt of contribution

viewing officer's recommendation and the committee's response, if any, the Commission will determine whether the committee violated 52 U.S.C. §30104(a) and, if so, will assess a civil money penalty based on the schedules of penalties. The committee will then have 30 days to pay the penalty or seek court review of the case.⁶ See 111.34 and 111.35.

Respondents must demonstrate one of the following situations in their challenge:

- The RTB filing is based on factual errors;
- The RTB civil money penalty is improperly calculated; or
- They could not file due to reasonably unforeseen circumstances beyond their control, and they filed the late report within 24 hours after those circumstances ended (also called the "best efforts" defense).

Excuses involving negligence, illness, inexperience, unavailability of committee staff or treasurer, failure to know filing dates, failure to use Commission soft-

ware properly, delays caused by vendors or failure of the committee's computers, software or Internet service provider do not qualify for the "best efforts" defense. 111.35(c) and (d).⁷

5. ELECTRONIC FILING

Campaign committees of House and Presidential candidates must file all reports and statements electronically if their total contributions or total expenditures exceed, or are expected to exceed, \$50,000 in a calendar year. 104.18(a). The requirement to file electronically does not apply to Senate candidate committees (or other committees that support only Senate candidates), who are required to file their reports on paper with the Secretary of the Senate.⁸

⁷ These rules are effective as of April 30, 2007. See 72 Fed. Reg. 14662 (March 29, 2007).

⁸ Senate candidates are encouraged to file an unofficial, electronic copy of their reports with the FEC (in addition to their official paper copy with the Secretary of the Senate) to ensure faster disclosure.

⁶ For more information on the Administrative Fine Program, see 11 CFR 111.30 to 111.46, and the Commission's website at www.fec.gov/af/af.shtml.

Any committees that are required to file electronically, but that file on paper or fail to file, may be subject to enforcement action as nonfilers. 104.18(a)(2). See the previous section, "Administrative Fines for Late Filers and Nonfilers."

Because electronic filing is more efficient and cost effective than paper filing, even House and Presidential committees that do not meet the \$50,000 threshold requirement are encouraged to voluntarily file their reports electronically. Please note, however, that voluntary electronic filers must continue to file electronically for the remainder of the calendar year unless the Commission determines that extraordinary and unforeseeable circumstances make continued electronic filing impractical. 104.18(b).

Methods of Electronic Filing

Most committees filing electronically find it convenient to do so via an Internet connection with a password. Committees may, however, submit their electronic reports on CDs, either hand delivered or sent by other means such as U.S. Postal Service. Electronic filers must file all their reports, notices, designations and statements electronically, and the reports must adhere to the FEC's Electronic Filing Specifications Requirements.⁹ 104.18(d).

Calculating the Threshold

Committees should use the following formulas to determine whether their total expenditures or total contributions are over \$50,000 per calendar year:

Total Contributions Received¹⁰
- Refunds of Contributions
= Total Contributions

or

Total Operating Expenditures
+ Contributions Made
= Total Expenditures

⁹ Available online at www.fec.gov/elecfil/vendors.shtml or on paper from the FEC.

¹⁰ Including the outstanding balance of any loans made, guaranteed or endorsed by the candidate or other person.

Have Reason to Expect to Exceed the Threshold

Once committees actually exceed the \$50,000 yearly threshold they have "reason to expect to exceed" the threshold in the following two calendar years. 104.18(a)(3)(i). Consequently, committees must continue to file electronically for the next two calendar years (January through December).

Exception

A campaign committee that met or exceeded the \$50,000 threshold and began filing electronically is not required to file electronically for the following two calendar years if it meets all three of the following requirements:

- Has \$50,000 or less in net debts outstanding on January 1 of the year following an election;
- Anticipates terminating prior to the next election year; and
- Supports a candidate who has not qualified for the next election and does not intend to become a candidate in the next election.

104.18(a)(3)(i).

Note that such committees must finish filing electronically for the calendar year in which they exceeded the threshold.

Committees with No History

New committees with no history of campaign finance activity on which to base their expectations have reason to expect to exceed the \$50,000 yearly threshold if:

- The committee receives contributions or makes expenditures that exceed one-quarter of the threshold amount in the first calendar quarter of the calendar year (i.e., exceeds \$12,500 by the end of March); or
- The committee receives contributions or makes expenditures that exceed one-half of the threshold amount in the first half of the calendar year (i.e., exceeds \$25,000 by the end of June).

104.18(a)(3)(ii).

Verification Requirements

The political committee's treasurer must verify the electronically filed reports by submitting either:

- A signed, written certification along with the CD; or

DECLARATION OF KRISTIN D. ROSER

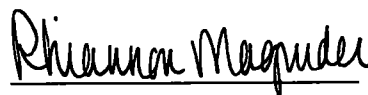
1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Barbara Mulvaney for Congress:
 - A) Notice of requirement to file electronically, dated November 17, 2014, referencing the 2014 October Quarterly Report (sent via electronic mail to: barbara@barbaramulvaneyforcongress.com);
 - B) Reason-to-Believe Letter, dated December 12, 2014 referencing the 2014 October Quarterly Report (sent via overnight mail to the address of record).
3. I hereby certify that I have searched the Commission's public records and find that Barbara Mulvaney for Congress has not filed an electronic version of the 2014 October Quarterly Report with the Commission. Barbara Mulvaney for Congress did, however, file a paper version of the report with the Commission on October 15, 2014.
4. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 30th day of January, 2015.



Kristin D. Roser
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission

DECLARATION OF RHIANNON MAGRUDER

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) The principal campaign committee of a candidate must file a report for the quarter ending September 30 no later than October 15. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on October 15 for the October Quarterly Report to be timely filed.
- 3) It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the administrative fine regulations, including due dates of reports and filing requirements.
- 4) I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of:
 - a) Page 1 of the Statement of Organization filed by Barbara Mulvaney for Congress and Jana Mulvaney, in her official capacity as Treasurer. According to the Commission's records, the document was received on February 7, 2014 and lists "barbara@barbaramulvaneyforcongress.com" as the Committee's email address;
 - b) Cover Page, Summary Page, and Detailed Summary Pages of the 2014 October Quarterly Report filed on paper by Barbara Mulvaney for Congress and Jana Mulvaney, in her official capacity as Treasurer. According to the Commission's records, the document was received on October 15, 2014.
 - c) Cover Page, Summary Page, and Detailed Summary Pages of the 2014 October Quarterly Report filed on paper by Barbara Mulvaney for Congress and Jana Mulvaney, in her official capacity as Treasurer. According to the Commission's records, the document was received on January 20, 2015.
 - d) Cover Page, Summary Page, and Detailed Summary Pages of the Termination Report filed on paper by Barbara Mulvaney for Congress and Jana Mulvaney, in her official capacity as Treasurer. According to the Commission's records, the document was received on January 20, 2015.
- 5) Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on the 12th day of February, 2015.



Rhiannon Magruder
Reviewing Officer
Office of Administrative Review
Federal Election Commission

FEC
FORM 1

STATEMENT OF
ORGANIZATION

RECEIVED

2014 FEB 10 AM 9:50

Office Use Only
FEC MAIL CENTER

1. NAME OF
COMMITTEE (In full)

☐

(Check if name
is changed)

Example: If typing, type
over the lines.

12FE4M5

Barbara Mulvaney for Congress

ADDRESS (number and street)

2730 Dayton Road

☐

(Check if address
is changed)

San Marino

CA

91108

CITY

STATE

ZIP CODE

COMMITTEE'S E-MAIL ADDRESS (Please provide only one e-mail address)

☐

(Check if address
is changed)

barbara@barbaramulvaneyforcongress.com

COMMITTEE'S WEB PAGE ADDRESS (URL)

☐

(Check if address
is changed)

www.barbaramulvaneyforcongress.com

2. DATE

02 / 03 / 2014

3. FEC IDENTIFICATION NUMBER

C

4. IS THIS STATEMENT

☒

NEW (N)

OR

☐

AMENDED (A)

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

Type or Print Name of Treasurer

Jana Mulvaney

Signature of Treasurer

Jana Mulvaney

Date

02 / 06 / 2014

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office
Use
Only

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-694-1100

FEC FORM 1
(Revised 02/2008)

**FEC
FORM 3**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**

For An Authorized Committee

1. NAME OF
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type
over the lines.

12FE4M57

BARBARA MCGRAW FOR CONGRESS

ADDRESS (number and street)

PO BOX 11451 WEST RD

Check if different
than previously
reported. (AO)

WHEELER DUTTER VALLEY

CA CA

95469

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

STATE ▼ DISTRICT

C00555555

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)

X October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

In the
State of

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

In the
State of

5. Covering Period

07 01 2014

through

09 30 2014

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

Barbara McGraw

Signature of Treasurer

[Signature]

Date

10 15 2014

NOTE: Submission of false, incorrect, or incomplete information may subject the person signing this Report to the penalties of 2 USC § 4372.

Office
Use
Only

FEC FORM 3
(Revised 02/2009)

SUMMARY PAGE

of Receipts and Disbursements

Page 2

Write or Type Committee Name

Report Covering the Period:

From:

to:

	COLUMN A This Period	COLUMN B Election Cycle-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e)) ...	0	0
(b) Total Contribution Refunds (from Line 20(d))	0	0
(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a))	0	0
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	78,118	197,102
(b) Total Offsets to Operating Expenditures (from Line 14)	50,115	6,777
(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a))	28,003	190,325
8. Cash on Hand at Close of Reporting Period (from Line 27)	18,259	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	124,250.00	

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

Page 3

I. RECEIPTS

COLUMN A
Total This Period

COLUMN B
Excess Over to Date

II. RECEIPTS FROM

1. SALES OF GOODS
2. SALES OF SERVICES
3. SALES OF OTHER ASSETS

4. SALES OF INVESTMENTS
5. SALES OF REAL ESTATE
6. SALES OF OTHER ASSETS

7. SALES OF FINANCIAL ASSETS
8. SALES OF OTHER ASSETS
9. SALES OF OTHER ASSETS

10. SALES OF OTHER ASSETS
11. SALES OF OTHER ASSETS
12. SALES OF OTHER ASSETS

III. RECEIPTS FROM

1. SALES OF GOODS
2. SALES OF SERVICES
3. SALES OF OTHER ASSETS

4. SALES OF INVESTMENTS
5. SALES OF REAL ESTATE
6. SALES OF OTHER ASSETS

7. SALES OF FINANCIAL ASSETS
8. SALES OF OTHER ASSETS
9. SALES OF OTHER ASSETS

10. SALES OF OTHER ASSETS
11. SALES OF OTHER ASSETS
12. SALES OF OTHER ASSETS

IV. TOTAL RECEIPTS

1. SALES OF GOODS
2. SALES OF SERVICES
3. SALES OF OTHER ASSETS

4. SALES OF INVESTMENTS
5. SALES OF REAL ESTATE
6. SALES OF OTHER ASSETS

7. SALES OF FINANCIAL ASSETS
8. SALES OF OTHER ASSETS
9. SALES OF OTHER ASSETS

10. SALES OF OTHER ASSETS
11. SALES OF OTHER ASSETS
12. SALES OF OTHER ASSETS

DETAILED SUMMARY PAGE
of Disbursements

Page 4

II. DISBURSEMENTS

COLUMN A
Total This Period

COLUMN B
Ending Cycle Balance

17. OPERATING EXPENDITURES.....

715.00

18. TRANSFERS TO OTHER
AUTHORIZED COMMITTEES.....

0.00

19. LOAN REPAYMENTS:

(a) Of Loans Made or Guaranteed
by the Candidate.....

400.00

(b) Of All Other Loans.....

0.00

(c) TOTAL LOAN REPAYMENTS
(add Lines 19(a) and (b)).....

400.00

20. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other
Than Political Committees.....

0.00

(b) Political Party Committees.....

0.00

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

0.00

(d) TOTAL CONTRIBUTION REFUNDS
(add Lines 20(a), (b), and (c)).....

0.00

21. OTHER DISBURSEMENTS.....

0.00

22. TOTAL DISBURSEMENTS
(add Lines 17, 18, 19(c), 20(c), and 21) ▶

425.00

500.00

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD.....

150.00

24. TOTAL RECEIPTS THIS PERIOD (from Line 16, page 3).....

500.50

25. SUBTOTAL (add Line 23 and Line 24).....

650.50

26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22).....

425.00

27. CASH ON HAND AT CLOSE OF REPORTING PERIOD
(subtract Line 26 from Line 25).....

225.50

**FEC
FORM 3**

Duplicate -
Except for address change.

**REPORT OF RECEIPTS
AND DISBURSEMENTS**

For An Authorized Committee

RECEIVED

2015 JUN 10 Office Use Only: 14

1. NAME OF
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type
over the lines.

12 FEB 4 2015
FEC MAIL CENTER

FEC - RAD

Reports Analysis Div.

BARBARA MULVANEY FOR CONGRESS

20 JAN '15 RCVD

ADDRESS (number and street)

11145 West Rd

POTTER VALLEY

POTTER VALLEY

CA

95469-1

CITY ▲

STATE ▲

ZIP CODE ▲

2. FEC IDENTIFICATION NUMBER ▼

000556555

3. IS THIS
REPORT

NEW
(N)

OR

✓ AMENDED
(A)

STATE ▼ DISTRICT

1 1

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

X October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

M M / D D / Y Y Y Y

in the
State of

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

M M / D D / Y Y Y Y

in the
State of

5. Covering Period

07 ' 01 ' 2014

through

09 ' 30 ' 2014

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

BARBARA MULVANEY

Signature of Treasurer

[Signature]

Date

12 ' 01 ' 2015

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

FEC FORM 3
(Revised 02/2003)

SUMMARY PAGE

of Receipts and Disbursements

Write or Type Committee Name

Report Covering the Period:

From:

07/01/2014

To:

09/30/2014

	COLUMN A This Period	COLUMN B Election Cycle-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	0	0
(b) Total Contribution Refunds (from Line 20(d))	0	0
(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a))	0	0
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	786.18	1,979.08
(b) Total Offsets to Operating Expenditures (from Line 14)	5,017.15	5,259.91
(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a))	4,230.97	4,630.17
8. Cash on Hand at Close of Reporting Period (from Line 27)	1,824.45	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	1,2425.00	

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

2014-11-14 14:44:11

FEC Form 3 (Revised 12/2003)

Page 3

Write or Type Committee Name

Report Covering the Period:

From:

MM ' DD ' YYYY
07 01 2014

To:

0.9 3.0 20.14

COLUMN A
Total This Period

COLUMN 8
Election Cycle-to-Date

11. CONTRIBUTIONS (other than loans) FROM:


- (a) **Individuals/Persons Other Than Political Committees**
 (i) **Itemized (Use Schedule A)**
 (ii) **Unitemized**
 (iii) **TOTAL of contributions from individuals**
 (b) **Political Party Committees**
 (c) **Other Political Committees (such as PACs)**
 (d) **The Candidate**
 (e) **TOTAL CONTRIBUTIONS (other than loans)**
(add Lines 11(a)(ii), (b), (c), and (d))

This image shows a single page of blank musical manuscript paper. It features ten horizontal staves, each consisting of five lines. The staves are arranged vertically and are separated by small gaps. On the right side of each staff, there is a large, stylized letter 'D' or a similar symbol, which appears to be a placeholder for a key signature or a specific notation. The paper is otherwise completely blank, with no notes, clefs, or other markings.

A series of seven horizontal strips showing the progression of a handwritten letter 'c' from a simple stroke to a more complex, stylized form.

**12. TRANSFERS FROM OTHER
AUTHORIZED COMMITTEES**

6



13. LOANS:

- (a) Made or Guaranteed by the Candidate.....
- (b) All Other Loans.....
- (c) TOTAL LOANS
(add Lines 13(a) and (b)).....

Handwriting practice lines with three circles at the end of each row.

124,250.00

14. OFFSETS TO OPERATING EXPENDITURES
(Refunds, Rebates, etc.)

501715

525991

15. OTHER RECEIPTS

- (Dividends, Interest, etc.)

37

43

16. TOTAL RECEIPTS (add Lines 11(e), 12, 13(c), 14, and 15)
(Carry Total to Line 24, page 4)

5.017.52

526034

1944-1-17-3051

FEC Form 3 (Revised 02/2003)

Page 4

COLUMN A
Total This Period

COLUMN B
Election Cycle-to-Date

7-8.6.18

5,979.08

4,000.00

4,000.00

4,000.00

4,000.00

[illegible]

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED
DATE 08-10-2001 BY 60322 UCBAW

0

478618

59.79.08

1593

50.17.5.2

6.610.63

4,786.18

18.24.45

FEC
FORM 3

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

RECEIVED

Office Use Only

1. NAME OF
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type
over the lines.

2015 JAN 20 AM 11:44
12 FEB 4M5
FEC MAIL CENTER

BARBARA MULVANEY for Congress

FEC-RAD

Reports Analysis Div.

ADDRESS (number and street)

11451 WEST RD

20 JAN '15 RCVD

Check if different
than previously
reported. (ACC)

PATTER Valley

CA

95469-

CITY ▲

STATE ▲

ZIP CODE ▲

2. FEC IDENTIFICATION NUMBER ▼

C00556555

3. IS THIS
REPORT

NEW
(N) OR

AMENDED
(A)

STATE ▼ DISTRICT

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)

X Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on M M / D D / Y Y Y Y

in the
State of

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on M M / D D / Y Y Y Y

in the
State of

5. Covering Period

09 ' 30 ' 2014

through

12 ' 31 ' 2014

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

BARBARA MULVANEY

Signature of Treasurer

[Signature]

Date

01 ' 13 ' 2015

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. §30108.

Office
Use
Only

FEC FORM 3
(Revised 02/2003)

SUMMARY PAGE

of Receipts and Disbursements

Write or Type Committee Name

BARBARA Mulvaney for Congress

Report Covering the Period: From:

08/01/2014

To:

12/31/2014

6. Net Contributions (other than loans)

(a) Total Contributions
(other than loans) (from Line 11(e))

0

0

(b) Total Contribution Refunds
(from Line 20(d))

0

0

(c) Net Contributions (other than loans)
(subtract Line 6(b) from Line 6(a))

0

0

7. Net Operating Expenditures

(a) Total Operating Expenditures
(from Line 17)

438.00

438.00

(b) Total Offsets to Operating
Expenditures (from Line 14)

0

0

(c) Net Operating Expenditures
(subtract Line 7(b) from Line 7(a))

438.00

438.00

8. Cash on Hand at Close of
Reporting Period (from Line 27)

0

9. Debts and Obligations Owed TO
the Committee (itemize all on
Schedule C and/or Schedule D)

0

10. Debts and Obligations Owed BY
the Committee (itemize all on
Schedule C and/or Schedule D)

0

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

2014-11-11 14:44:11
COUNTDOWN

Page 4

COLUMN 8
Election Cycle-to-Date

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD.....	1,824.45
24. TOTAL RECEIPTS THIS PERIOD (from Line 16, page 3).....	0
25. SUBTOTAL (add Line 23 and Line 24).....	1,824.45
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22).....	1,824.45
27. CASH ON HAND AT CLOSE OF REPORTING PERIOD (subtract Line 26 from Line 25).....	0



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 12, 2015

Jana Mulvaney
Barbara Mulvaney for Congress
11451 West Road.
Potter Valley, CA 95469

C00556555
AF#: 2845

Dear Ms. Mulvaney:

On December 11, 2014, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Barbara Mulvaney for Congress and you, in your official capacity as Treasurer ("respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2014 October Quarterly Report. The Commission also made a preliminary determination that the civil money penalty was \$330 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing the written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 999 E Street, NW, Washington, DC 20463 or via facsimile (202-208-3333). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1660 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Rhiannon Magruder".

Rhiannon Magruder
Reviewing Officer
Office of Administrative Review



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 20, 2015

MEMORANDUM

To: The Commission

Through: Alec Palmer *ewh for*
Staff Director

From: Patricia C. Orrock *PCO*
Chief Compliance Officer

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 2845 – Barbara Mulvaney for Congress and Jana Mulvaney, in her official capacity as Treasurer (C00556555)

On December 11, 2014, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) for failing to timely file the 2014 October Quarterly Report and made a preliminary determination that the civil money penalty was \$330 based on the schedule of penalties at 11 C.F.R. § 111.43.

On January 20, 2015, the Commission received their written response ("challenge"). After reviewing the challenge, the Reviewing Officer Recommendation ("ROR") dated February 12, 2015 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. They submitted no evidence that a factual error was made in the RTB finding, that the penalty was miscalculated at RTB, or that they used best efforts to file on time. 11 C.F.R. § 111.35(b). Therefore, the Reviewing Officer recommended that the Commission make a final determination that they violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a \$330 civil money penalty.

Within 10 days of transmittal of the recommendation, they may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). On February 18, 2015, the Candidate contacted the Reviewing Officer and indicated she would not be submitting a response to the ROR.

MISSION

- 1) Adopt the Reviewing Officer recommendation for AF# 2845 involving Barbara Mulvaney for Congress and Jana Mulvaney, in her official capacity as Treasurer, in making the final determination;
- 2) Make a final determination in AF# 2845 that Barbara Mulvaney for Congress and Jana Mulvaney, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a \$330 civil money penalty; and
- 3) Send the appropriate letter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Final Determination Recommendation -) AF 2845
Barbara Mulvaney for Congress and Jana)
Mulvaney, in her official capacity as)
Treasurer (C00556555))

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on April 14, 2015, the Commission decided by a vote of 6-0 to take the following actions in AF 2845:

1. Adopt the Reviewing Officer recommendation for AF# 2845 involving Barbara Mulvaney for Congress and Jana Mulvaney, in her official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 2845 that Barbara Mulvaney for Congress and Jana Mulvaney, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a \$330 civil money penalty.
3. Send the appropriate letter.

Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

Attest:

April 14, 2015
Date

Shawn Woodhead Werth
Shawn Woodhead Werth
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 15, 2015

Jana Mulvaney
Barbara Mulvaney for Congress
11451 West Road
Potter Valley, CA 95469

C00556555
AF#: 2845

Dear Ms. Mulvaney:

On December 11, 2014, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Barbara Mulvaney for Congress and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) for failing to file the 2014 October Quarterly Report. By letter dated December 12, 2014, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$330 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On January 20, 2015, the Office of Administrative Review received your written response challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and your written response. Based on this review, the Reviewing Officer recommended that the Commission make a final determination that Barbara Mulvaney for Congress and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a civil money penalty in the amount of \$330 in accordance with 11 C.F.R. § 111.43. A copy of the Reviewing Officer Recommendation was sent to you on February 12, 2015.

On April 14, 2015, the Commission adopted the Reviewing Officer's recommendation and made a final determination that Barbara Mulvaney for Congress and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assessed a civil money penalty in the amount of \$330. A copy of the Final Determination Recommendation is attached.

At this juncture, the following courses of action are available to you:

- 1. If You Choose to Appeal the Final Determination and/or Civil Money Penalty**
If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the U.S. District Court for the district in which the committee or you reside, or transact business, requesting that the final determination be modified

or set aside. See 52 U.S.C. § 30109(a)(4)(C)(iii) (formerly 2 U.S.C. § 437g(a)(4)(C)(iii)). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 52 U.S.C. § 30109 (formerly 2 U.S.C. § 437g). 11 CFR § 111.38.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Appeal

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 *et seq.* If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 28% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the civil money penalty, send the enclosed remittance form, along with your payment, to the address on page 4 within 30 days of receipt of this letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assessed upon making a final determination.

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted

payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assessed upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) (formerly 2 U.S.C. § 437g(a)(12)) no longer apply and this matter is now public. Pursuant to 11 C.F.R. §§ 111.42(b) and 111.20(c), the file will be placed on the public record within 30 days from the date of this notification.

If you have any questions regarding the payment of the civil money penalty, please contact Rhiannon Magruder on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Ann M. Ravel
Chair

ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. § 111.43, the civil money penalty is \$330 for the 2014 October Quarterly Report.

This penalty should be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
PO Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox
FEC # 979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

The form and payment are due within 30 days of receipt of this letter.

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Barbara Mulvaney for Congress

FEC ID#: C00556555

AF#: 2845

PAYMENT AMOUNT DUE: \$330