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OFFICE OF GENERAL  
COUNSEL

January 3, 2011

Federal Election Commission  
Office of General Counsel  
Attn: Kathleen Guith, Acting Associate General Counsel, Enforcement  
999 E Street, N.W.  
Washington, D.C. 20463

PRE-MUR # 514

RE: Sua Sponte Submission Pursuant to FEC Notice 2007-8

Dear Ms. Guith,

We represent Mr. Michael E. Weaver ("Mike Weaver") and Mrs. Rebecca J. Weaver ("Becky Weaver") (collectively the "Weavers"), of 10671 Winterwood, Carmel, Indiana 46032, who asked us to audit and then report two minor violations of federal campaign finance laws that came to their attention while reviewing their year-end finances.

As a starter, let me assure you these violations were not intentional or willful. These mistakes were the result of improper bookkeeping practices that have now been corrected, which – we have been assured – will prevent such inadvertent errors from occurring in the future. While we believe you will find these violations to be minor, the Weavers nonetheless take these errors very seriously and have authorized us to make full disclosure of our audit and investigative work product that would otherwise be privileged and confidential.

The Weavers have authorized these disclosures pursuant to the self-reporting procedures outlined in FEC Notice 2007-8. See 72 Fed. Reg. 16695. It is our hope that in making such disclosures so quickly after they were discovered, you will decide to take no further action, or at least, consider this matter for Fast-Track Resolution ("FTR"). You should also be aware that we have already taken steps to ensure that both violations are corrected, and believe that has satisfactorily occurred.

Initially, we have created and attached for your review schedules of all federal campaign contributions made by the Weavers in the last biennium (2009-2010). Mike Weaver's schedule is attached to this letter as Exhibit A and Becky Weaver's schedule is attached to this letter as Exhibit B. We have noted on each schedule for each individual contribution, the corresponding identification number for the report containing that contribution in the FEC's online database. We have also collected copies of the actual proof of payment – some of which are checks, others are credit card transactions – that correspond to each contribution. Those were Bates labeled and attached hereto as Exhibit C. We have also added the Bates label for each proof of payment on the Weavers' contribution schedules.

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Kathleen Guith, Acting Associate General Counsel, Enforcement  
January 3, 2011  
Page 2

You will see that when Mike Weaver made a \$1000 contribution to the "Hoosiers for Rokita" campaign committee (FEC ID # 10992307927) on November 1, 2010, it caused him to exceed by \$300 the biennial aggregate contribution limit on contributions to individual candidates of \$45,600. When we identified this error, we requested, on Mike's behalf, that the "Hoosiers for Rokita" committee return the full contribution of \$1,000. This request letter is attached as Exhibit D.

Second, the Weavers also discovered that Becky Weaver inadvertently contributed in excess of the individual candidate committee limit of \$2400 to the "Friends of Todd Young" campaign committee during the 2010 general election. In total, Becky made three contributions to the Friend Todd Young campaign committee during the last biennium.

First, during the primary election, Becky Weaver contributed \$2400 on September 30, 2009 (FEC ID # 10930855562). Her second contribution of \$2400, this time in the general election, occurred on March 22, 2010 (FEC ID #10990569475). Finally, she inadvertently made a third contribution of \$2400 on June 29, 2010 (FEC ID #10931011516) during the general election, placing her over the individual candidate committee limit in the 2009-2010 biennium.

In the course of our audit, we discovered that the "Friends of Todd Young" committee reported a fourth contribution of \$2400 from Becky Weaver on September 30, 2010. This was a reporting error by the candidate's committee. *Becky Weaver made no such contribution.* We brought this error to the attention of the "Friends of Todd Young" committee and they have acknowledged that it was their error, and they are in the process of submitting an amended reporting form to the FEC to correct the error.

We nonetheless sent a letter, on Becky Weaver's behalf, to the "Friends of Todd Young" committee, asking that they both return Becky's inadvertent excess \$2,400 contribution from June 29, 2010 and remove the wrongly reported September 30, 2010 contribution from their FEC contribution forms. This request letter is attached as Exhibit E. The committee has already processed a refund check for \$2400, a copy of which is attached as Exhibit F.

In evaluating a possible disposition to these two violations, please consider the remedial steps the Weavers have already taken. They hired this law firm to conduct a complete audit of all of their 2009-2010 contributions to identify any other potential violations that may have occurred, they sent letters to correct and recover the offending contributions, and they have fully reported and disclosed these violations under the FEC's self-reporting program.

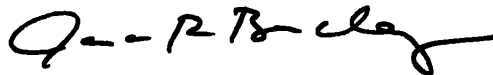
The Weavers also have no prior violations of campaign finance laws with the FEC or any state election regulatory body. As noted, they have also already taken steps to implement a more rigorous tracking system of campaign contributions to avoid such mistakes in the future.

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Kathleen Guith, Acting Associate General Counsel, Enforcement  
January 3, 2011  
Page 3

We appreciate your consideration of this matter. You can contact me directly at (317) 231-7250 to discuss what additional steps we can take to achieve a full resolution.

Sincerely,



Jason R. Barclay

JRB/wka  
Enclosures

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