

Federal Election Commission
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OFFICE OF GENERAL
COUNSEL

From: Stephen Eichler – Treasurer
Minuteman Victory PAC - C00458109
9468 Magnolia Ave. #203
Riverside, Ca. 92503-3746

Response date: March 9, 2011
Re: RR 11L-04

To Whom this May Concern:

This letter is in response to the correspondence from Jeff S. Jordan Supervisory Attorney/Complaints Examination & Legal Administration, dated February 25, 2011 and received by the Minuteman Victory PAC on March 5th, 2011 by regular U.S. Postal Service.

I am deeply concerned regarding this matter and desire to clear up any issue regarding this concern.

The three failures to file the 48-Hour Notices, as noted in your correspondence, was an unintentional mistake on my part, no one else's. Had I known about this reporting requirement I would have complied. This is evident by the fact I self-reported the entries and thereby unknowingly created these errors, therefore, I used every attempt to be compliant, but failed.

Furthermore, I have placed many telephone calls to, and received much instruction from, my Finance Analyst, Allan Norfleet from the beginning of the PAC. He has guided me into a better understanding of the requirements of filing and proper use of the F.E.C. software.

However, I could not find in-depth written support, YouTube style videos or outside material to even know what questions I should be asking. As a grass-roots activist I do not have the experience of being a professional political consultant. I have no background in politics and no formal guidance in these matters, except from your Analyst, Allan Norfleet. I have sought educational support for the proper filing procedures, tips and guidelines and found little. Public information regarding the F.E.C. filing deadlines and regulations were scant at best. I have worked on a best efforts basis with full due diligence, calling on a regular basis to my Analyst, yet, I have inadvertently failed to file properly, as noted by your letter.

These errors were fully corrected when brought to my attention with the help of my Analyst. Furthermore, I have learned from these errors and for a fact, they will not be repeated.

I have asked my Analyst if I could fly to Washington to visit the F.E.C. and receive specific training, but I discovered there is no provision for such 'one on one' training. Why not?

I searched the F.E.C. website, but could not find any educational seminars that would help me. In addition to my search for help I was left with only one course of action and that was many telephone calls to my Analyst, however, he is not a mind reader and voice only communications are grossly insufficient when dealing with numerical filing of such importance.

When I created this PAC I was unaware of the complex FEC filing software and filing regulations necessary to sustain a PAC. There was no expanded explanation on how to file and what to do with the exception of the F.E.C. pdf guidelines, which did not fully address my specific questions and concerns. Not having a full understanding of

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the complexities of running a PAC with the required intricacies of the unique filing process, created unseen circumstances beyond my control, simply because of my lack of training.

Therefore, I entered into a process which there was little disclosure to the magnitude and intensity of F.E.C. compliance.

I have searched for schedules, guidelines of regulatory filing perimeters and found very little. The result was my unknowing violation of 48-Hour Notice filing dates, which upon discovery; I quickly corrected and took action as to never letting these errors happen again.

Once again, Allan Norfleet is an excellent Analyst, but he can never take the place of printed understandable guidelines, or specialized classes, especially as understood by a grass-roots activist with no political experience.

The letter I received from Jeff S. Jordan Supervisory Attorney/Complaints Examination & Legal Administration dated February 25, 2011, attachment 3 titled: 2010 Supplement Filing Information Congressional Committees, has more useful information in that letter than I could find on the FEC website. If I could have had this information from day one we would not be having this conversation.

To add substance to my comments, please refer to Allan Norfleet, for in recent weeks. I became so concerned with proper reporting procedures that I suspended contributions to any candidate and have greatly reduced my fund raising efforts in fear of violating any F.E.C. regulations. Until I can either receive adequate training on the proper filing requirements, I must only deal with political issues and NOT candidates. Using this method I can stay on issue without the short term notice requirements. Once proper training can be obtained, then and only then, I will be able to operate within F.E.C. guidelines in regards to candidate independent expenditures and direct donations to candidates.

Therefore, it is obvious that the problems have been rectified, but not only through the guidance of Allan Norfleet and the amended filings, but also my ceasing of actions which could create a short term filing requirements and thereby unknowingly creating more filing errors of different types.

In summary, I want to reiterate the 48-Hour Notice filing errors will not be repeated, I am under the continue instruction of my Analyst. I am willing to attend any F.E.C. educational seminars and have taken preventative steps so that proper filing is insured.

Had I known the intricacies of the filings and FEC software interaction we would not be having this discussion, however, the filing errors I inadvertently created was totally unforeseen and without the proper knowledge, unforeseeable on my part.

I hope that my explanation will carry with it a sense of urgency for not only myself, but for others who find themselves struggling to be compliant in an arena of regulations which are unknown until either disclosed by the Analyst or violated in error.

Please accept my apologies for these filing errors and I hope that we can come to an amenable solution.

Sincerely,



Stephen Eichler, Treasurer
Minuteman Victory PAC - C00458109

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