SENSITIVE

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

MUR: 5785
DATE OF NOTIFICATIONS: August 9, 2006
RESPONSE RECEIVED: September 28, 2006
DATE ACTIVATED: October 18, 2006

EXPIRATION OF STATUTE OF LIMITATIONS:
April 1, 2011

COMPLAINANT: Glenn Hamer, Executive Director
Arizona Republican Party

RESPONDENTS: James E. Pederson
Pederson 2006 and Carter Olson, in his official capacity as treasurer

RELEVANT STATUTES AND REGULATIONS:
2 U.S.C. §§ 434(a)(6)(B)(iii) and (iv)
11 C.F.R. § 100.19(g)
11 C.F.R. § 104.5
11 C.F.R. § 400.21(a)
11 C.F.R. § 400.22(a)
11 C.F.R. § 400.25

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

RAD REFERRAL: 07L-02
DATE ACTIVATED: February 16, 2007

EXPIRATION OF STATUTE OF LIMITATIONS:
April 1, 2011

RESPONDENTS: James E. Pederson
Pederson 2006 and Carter Olson, in his official capacity as treasurer

RELEVANT STATUTE AND REGULATIONS: 2 U.S.C. § 434(a)(6)(B)(iii)
11 C.F.R. § 400.21(a)
11 C.F.R. § 400.25
11 C.F.R. § 104.5

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. INTRODUCTION

MUR 5785 is about five 24-Hour Notices of Expenditures from Personal Funds ("Forms 10s") filed by James E. Pederson, a candidate for U.S. Senator from Arizona in 2006, pursuant to the so-called "Millionaires' Amendment" of the Bipartisan Campaign Reform Act of 2002. The Respondents concede that their initial Form 10, disclosing $2,000,000 in expenditures from Pederson's personal funds, was filed six days late, and a subsequent Form 10, disclosing $275,000 in expenditures by Pederson, was filed three days late. Reports Analysis Division ("RAD") Referral 07L-02 concerns only the initial late notification, which had been the subject of a Request for Additional Information ("RFAI") dated September 19, 2006.

Three other Form 10s, disclosing more than $1,900,000 in expenditures from personal funds, were received timely by the Commission, but not by the Secretary of the Senate. Respondents protest that they sent the notice to the Secretary by overnight mail. However, the Secretary did not receive them in the prescribed time frame because they stopped first at a Senate offsite mail irradiation facility. The applicable regulation calls for Form 10s to be transmitted by either facsimile or electronic mail, not overnight mail. However, because the Instructions for Form

10 provide only postal addresses for the Secretary, we recommend the Commission dismiss the complaint as to these three Form 10s and find reason to believe and conciliate as to the other two.[1]

II. DISCUSSION

A. Late Reporting of Personal Funds Expenditures to Both the Commission and the Secretary of the Senate

1. Facts

Pederson exceeded the $648,720 threshold for Arizona senatorial candidates on March 31, 2006, when he contributed $2,000,000 to his Committee, triggering the obligation to notify the Commission and the Secretary of the Senate on Form 10s within 24 hours of the expenditure, and again triggered the notification obligation with a subsequent candidate expenditure of $275,000 on June 30, 2006.[2] However, such notifications were not received, respectively, until April 7, 2006, six days late, and July 4, 2006, three days late. Respondents concede these filings were untimely.

Respondents explain their initial late notification as stemming from a misunderstanding of the Millionaires' Amendment's requirements. They read Form 10—which is headed "24 Hour Notice of Expenditure From Candidate's Personal Funds"—to mean that their notification obligation was not triggered until 24 hours after the Committee expended more than $648,720 of the candidate's funds, rather than 24 hours after the candidate expended personal funds by giving it to the Committee. *See* Exhibit B to the Response (Affidavit of Pederson Committee Compliance Officer Darryl Tattrie); *see also* Committee's identical October 11 and 16, 2006 Responses to RFAI, referencing the initial late notification and maintaining that it "makes every effort to file

[1] The cover letter to the complaint refers to, and attaches, a news article published on *The Arizona Republic's* website, www.az.com, reporting that the Pederson Committee did not use "best efforts" when it failed to initially identify the occupations of the candidate's spouse and his campaign manager in connection with their contributions. The cover letter "notes[s]" the article, stating that it is "another issue we hope the FEC will take under consideration," but does not reference it in the complaint itself. As the Committee has amended its reports to provide the proper information concerning these two contributors, we do not believe this matter warrants additional consideration and do not address it further in this Report.

[2] Pederson was unopposed in the primary.

reports in a timely manner and ha[s] implemented procedures to ensure timely filing in the future." As for the second late filing, Respondents assert that both the treasurer and assistant treasurer were traveling on June 30, 2006 for the July 4, 2006 weekend and could not be reached in time to avoid a late filing. *See* Exhibit B to the Response, *supra*.

2. Analysis

A Senate candidate or his or her principal campaign committee must notify the Commission, the Secretary of the Senate, and each opposing candidate when the candidate makes an expenditure from personal funds exceeding two times the threshold amount.[3] 2 U.S.C. § 434(a)(6)(B)(iii); 11 C.F.R. § 400.21(a). This notification must be received within 24 hours of the time such expenditure is made. *Id.* For additional expenditures aggregating more than $10,000, the candidate is required to notify the Secretary of the Senate, the Commission and each opposing candidate in a Form 10 filing within 24 hours of the time such expenditure is made. *See* 2 U.S.C. § 434(a)(6)(B)(iv) and 11 C.F.R. § 400.22(a).

In response to the complaint, Respondents concede that they failed to timely file the initial notification of the candidate's $2,000,000 expenditure and subsequently failed to timely file the notification of the candidate's expenditure of $275,000. Respondents' misunderstanding of the legal requirements and failure to ensure the Form 10s would be timely signed hardly negates the violations. Therefore, we recommend the Commission find reason to believe that Pederson 2006 and Carter Olson, in his official capacity as treasurer, violated 2 U.S.C. §§ 434(a)(6)(B)(iii) and (iv), and 11 C.F.R. §§ 400.21(a) and 400.22(a), in connection with their untimely filings of Form 10s with the Commission and the Secretary of the Senate for candidate expenditures made on

[3] The threshold amount for United States Senate candidates is the sum of $150,000 plus an amount equal to the voting age population ("VAP") of the state multiplied by 4 cents. *See* 11 C.F.R. § 400.9. In the case of Arizona in 2006, the threshold amount was $324,360 ($150,000 + (4,359,000 VAP x .04, or $174,360). Thus, an amount that is two times the threshold amount is $648,720 ($324,360 x 2).

Because the Form 10s pertained to the primary election, in which Pederson was unopposed, notification of opposing candidates is not an issue in this matter.

March 31, 2006 and June 30, 2006. Since the candidate was responsible for ensuring that these Form 10s were filed in a timely manner, *see* 11 C.F.R. § 400.25, this Office also recommends that the Commission find reason to believe that James B. Pederson violated 2 U.S.C. §§ 434(a)(6)(B)(iii) and (iv).

B. <u>Late Filing of Personal Funds Expenditures with the Secretary of the Senate</u>

The complaint also alleges that Pederson failed to file timely three additional Form 10s with the Secretary of the Senate, even though it acknowledges these forms were timely filed with the Commission. The forms disclosed expenditures by Pederson amounting to $1,200,000 on May 8, 2006, $250,000 on June 14, 2006, and $459,098 on July 20, 2006. Date and time stamps affixed by the Secretary of the Senate's office indicate that office received the filings several days late. Respondents claim they timely filed these Form 10s with the Secretary of the Senate because they sent them by overnight mail, and produced the supporting shipping receipts.[4]

Section 100.19(g) provides that Form 10s are considered timely filed if they are received by each of the "appropriate parties," as identified in 11 C.F.R. §§ 400.21 and 400.22, by facsimile or electronic mail ("e-mail") within 24 hours of the time the expenditures triggering the notification obligations are made. The applicable regulations at sections 400.21 and 400.22, in turn, identify the Secretary of the Senate, as well as the Commission and each opposing candidate, as the "appropriate parties" referenced in 11 C.F.R. § 100.19(g). Thus, a Senate candidate's Form 10 is timely filed only if received by both the Commission and the Secretary of the Senate within 24 hours, and the regulations prescribe transmission by facsimile or e-mail. The regulations do not, by

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[4] According to Respondents, the Instructions for FEC Form 10 require that such forms should be delivered to the Secretary by hand or mail, and if sent, are timely as long as they are postmarked by the due date. They acknowledge that pursuant to 11 C.F.R. § 100.19, such forms are considered timely if those parties required to receive them electronically do so within 24 hours, but wrongly construe such parties to exclude the Secretary of the Senate. *See* discussion *infra*.

contrast, prescribe transmission by overnight mail. Unlike some other provisions of section 100.19 prescribing timely filing of other reports, the focus of section 100.19(g) is on receipt, not transmission. Moreover, as a practical matter, overnight mail is unlikely to reach the Secretary of State within 24 hours, due to the Senate's practice of sending mailings offsite for irradiation prior to accepting delivery of them.

The Instructions for Form 10, however, provide only a physical address and a P.O. box for the Secretary of the Senate, not a facsimile number or an e-mail address. *See* Attachment 1.[5] Therefore, a committee consulting the Instructions to Form 10 might assume that hand-delivery or overnight mail are the only ways to timely file Form 10s with the Secretary of the Senate. But, as noted, even if the "overnighting" route is chosen, it is unlikely that the Secretary of the Senate will receive the Form 10s in 24 hours because all outside mail is first irradiated, a process that can take several days. Therefore, we recommend that the Commission, as a matter of prosecutorial discretion, dismiss the allegations pertaining to the Form 10s that were timely provided to the Commission, but not to the Secretary of the Senate. *See Heckler v. Chaney*, 470 U.S. 831 (1985).[6]

[5] In contrast, the Instructions for Form 6, for 48-Hour Notice[s] of Contributions/Loans Received, provide the Secretary of the Senate's facsimile number. *See* Attachment 2.

[6] Complainant also maintains that there may be an issue whether the July 20, 2006 Pederson expenditure might have been made earlier than that date, based on a news report about a Pederson advertising campaign starting on July 21, 2006 that was purportedly funded by Pederson's expenditure. As this purported issue is purely speculative and Respondents have confirmed that the expenditure was made on July 20, 2006, as reported, we do not think that it warrants any further attention by the Commission.

IV. RECOMMENDATIONS

1. Open a MUR with respect to RAD Referral 07L-02, and merge the new MUR into MUR 5785.

2. Find reason to believe Pederson 2006, and Carter Olson, in his official capacity as treasurer, violated 2 U.S.C. §§ 434(a)(6)(B)(iii) and (iv) and 11 C.F.R. §§ 400.21(a) and 400.22(a).

3. Find reason to believe James B. Pederson violated 2 U.S.C. §§ 434(a)(6)(B)(iii) and (iv).

4.

5. Approve the attached Factual and Legal Analyses.

6. Dismiss the allegations in the complaint concerning late filings with the Secretary of the Senate for candidate expenditures from personal funds made on May 8, 2006, June 14, 2006, and July 20, 2006.

7. Approve the appropriate letters.

Thomasenia P. Duncan
Acting General Counsel

Lawrence L. Calvert, Jr.
Deputy Associate General Counsel
for Enforcement

2/22/07
Date

BY: Susan L. Lebeaux
Susan L. Lebeaux
Assistant General Counsel

Ruth Heilizer
Ruth I. Heilizer
Attorney

Attachments:
1. Instructions for Form 10
2. Instructions for Form 6

FEDERAL ELECTION COMMISSION

Instructions for FEC FORM 10, 24-Hour Notice of Expenditure of Personal Funds (11 CFR 400.21 and 400.22 (Millionaires' Amendment))

Who Must File

Senate Candidates. A committee for the U.S. Senate must file this form initially when the candidate makes or obligates to make expenditures from personal funds aggregating in excess of 2 times the threshold amount published by the Commission in connection with any election. The committee must also file this form each time the candidate makes, or obligates to make, expenditures from personal funds that, in the aggregate, exceed $10,000 since the last time that the committee was required to file this report. 11 CFR 400.21(a) and 400.22(a).

House Candidates. A committee for the U.S. House must file this form initially when the candidate makes or obligates to make expenditures from personal funds aggregating in excess of $350,000 in connection with any election. The committee must also file this form each time the candidate makes, or obligates to make, expenditures from personal funds that, in the aggregate, exceed $10,000 since the last time that the committee was required to file this report. 11 CFR 400.21(b) and 400.22(b).

When to File

Senate Candidates. The Commission must receive this report no later than 11:59 p.m. Eastern Standard/Daylight Time of the day following the date on which a candidate for the U.S. Senate makes or obligates to make expenditures from personal funds aggregating in excess of 2 times the threshold amount published by the Commission in connection with any election. Note: if the candidate makes expenditures that trigger the threshold for both the primary and general elections, submit a separate Form 10 for each election. Also, the Commission must receive this report no later than 11:59 Eastern Standard/Daylight Time of the day following the date on which the candidate makes or obligates to make subsequent expenditures from personal funds aggregating in excess of $10,000. 11 CFR 400.21(a) and 400.22(a).

House Candidates. The Commission must receive this report no later than 11:59 p.m. Eastern Standard/Daylight Time of the day following the date on which a candidate for the U.S. House makes or obligates to make expenditures aggregating in excess of $350,000 in connection with any election. Note: If the candidate makes expenditures that trigger the threshold for both the primary and general elections, submit a separate Form 10 for each election. Also, the Commission must receive this report no later than 11:59 p.m. Eastern Standard/Daylight Time of the day following the date on which the candidate makes or obligates to make subsequent expenditures from personal funds aggregating in excess of $10,000. 11 CFR 400.21(b) and 400.22(b).

Where to File

Senate Candidates. The principal campaign committee of a candidate seeking nomination or election to the United States Senate must file Form 10 with the Secretary of the Senate, Office of Public Records, 232 Hart Senate Office Building, Washington, DC 20510-7116. Mail addressed to the Secretary of the Senate should read: "Office of Public Records, P.O. Box 5109, Alexandria, VA 22301-0109." The principal campaign committee must also send a copy of Form 10 (or the information contained therein) to the Commission by facsimile machine (to 202-219-0174) or by electronic mail to (2022190174@fec.gov). The committee must also simultaneously send a copy via facsimile machine or electronic mail to each opposing candidate. For purposes of a primary election, opposing candidate means another candidate seeking the nomination of the same political party. For purposes of the general election, opposing candidate means another candidate seeking election to the same office. See 11 CFR 400.3. Fax numbers and electronic mail addresses for opposing candidates should be available on the Statement of Organization (FEC Form 1) filed by the principal campaign committee (PCC) of each opposing candidate. The Statements of Organization can be viewed on the FEC's web site at www.fec.gov. 11 CFR 400.24(a).

House Candidates. The principal campaign committee of a candidate seeking nomination or election to the United States House must file Form 10 electronically with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463. The committee must also simultaneously send a copy of Form 10 (or the information contained within) via facsimile machine or electronic mail to each opposing candidate and the national party committee of each opposing candidate. For purposes of a primary election, opposing candidate means another candidate seeking the nomination of the same political party. For purposes of the general election, opposing candidate means another candidate seeking election to the same office. See 11 CFR 400.3. Fax numbers and electronic mail addresses for opposing candidates and their national party committees should be available on the Statement of Organization (FEC Form 1) filed by the principal campaign committee (PCC) of each opposing candidate and the national party committees, respectively. The Statements of Organization can be viewed on the FEC's web site at www.fec.gov. 11 CFR 400.24(b).

State Filing. House candidates in Guam and Puerto Rico must file a copy of this form with those territories. (As of August 2005, these territories had not qualified for the state filing waiver program.)

1 2

Limited Circumstance Under Which Filing of FEC Form 10 Will Also Satisfy FEC Form 6 (48-Hour Notice of Contributions/Loans Received) Filing Requirement. Please note that if FEC Form 10 is filed for candidate contributions, candidate personal loans, candidate advances, or endorsements of loans from a lending institution by the candidate of $1,000 or more received after the 20th day but more than 48 hours before 12:01 a.m. on the day of the election, the filing of FEC Form 10 will satisfy the FEC Form 6 (48-Hour Notice of Contributions/Loans Received) filing requirement for those same receipts. This limited exception to the requirement to file a separate FEC Form 6 in such circumstances is only applicable when the FEC Form 10 is filed within the 48 hour filing time frame for the FEC Form 6.

Example: Eighteen days before his primary election, Joe Candidate loans $500,000 from his personal funds to his campaign. Because the amount is over $1,000 and the loan was made after the 20th day but more than 48 hours before the election, Joe's campaign must file Form 6 to disclose the last minute contribution. 11 CFR 104.5(f). Since the candidate's loan exceeds the personal funds threshold amount (i.e., $350,000 for a House campaign), Joe's campaign must also file Form 10 within 24 hours to disclose his expenditure of personal funds. 11 CFR 400.21. In this limited circumstance, where the same expenditure triggers the requirement to file both Form 6 and Form 10, the campaign need only file Form 10 (within 24 hours), checking box 13(a) and providing the required information to fulfill the Form 6 filing requirement.

Line-by-Line Instructions

LINE 1. Name of Candidate. List the name of the candidate.

LINE 2. Office Sought. List the office the candidate is seeking (House or Senate).

LINE 3. State. List State.

LINE 4. District. List district if applicable.

LINE 5. Candidate ID Number. List the identification number (beginning with H for a House candidate or S for a Senate candidate) issued to the candidate by the FEC after his or her Statement of Candidacy was filed.

LINE 6. Name of Principal Campaign Committee. List the name of the committee the candidate named as his or her principal campaign committee on FEC Forms 1 and 2 (the Statement of Organization and Statement of Candidacy, respectively).

LINE 7. Committee ID Number. List the identification number (beginning with C) issued to the principal campaign committee by the FEC after its Statement of Organization was filed.

LINE 8. Address. List the address of the principal campaign committee.

LINE 9. City, State and Zip Code. Provide the requested information for the principal campaign committee.

LINE 10. Expenditures of Personal Funds. In the box for "Aggregate Expenditures Previously Reported During the Election Cycle," list the total amount reported on Line 11 of the most recent Form 10 filed. For purposes of this form, "election cycle" means the period beginning on the day after the date of the most recent election for the specific office or seat that a candidate is seeking and ending on the date of the next election for that office or seat. A primary election and a general election are considered to be separate election cycles, but a runoff election is considered to be part of the election cycle of the election necessitating the runoff election. 11 CFR 400.2. For each expenditure of personal funds made, list the required information (date, election made for, as described above, and amount). Note: Do not combine election cycles on a single Form 10. If the candidate has made expenditures for different elections, submit a separate Form 10 for each election. If the expenditure was made in the form of a loan from the candidate to his or her committee, check the appropriate box.

LINE 11. Total Expenditures This Notice. Total the expenditures listed on the notice.

LINE 12. Total Expenditures Election Cycle to Date. If this is the first notice filed for the election cycle, carry the total forward from Line 11 to Line 12. If this is not the first notice filed during the election cycle, add the total from Line 11 to the total listed at the top of Line 10 as "Aggregate Expenditures Previously Reported During the Election Cycle."

LINE 13. 48-Hour Notice of Last-Minute Contributions. In some cases, Form 10 may be used to satisfy both Form 10 and Form 6 filing requirements. See "Limited Circumstance Under Which Filing of FEC Form 10 Will Also Satisfy FEC Form 6 (48-Hour Notice of Contributions/Loans Received) Filing Requirement" above for more information on when to fill out this Line.

13(a). Check box if using Form 10 to satisfy the requirement to file FEC Form 6 to disclose a last-minute contribution or loan of $1,000 or more. Otherwise, leave Line 13 blank.

13(b). Provide the name of employer for the candidate. "Employer" means the organization or person by whom an individual is employed, and not the name of his or her supervisor. Use "self-employed" if applicable.

13(c). Provide the occupation of the candidate. "Occupation" means the principal job title or position of an individual.

The committee treasurer must sign and date the form. 11 CFR 400.25.

FEDERAL ELECTION COMMISSION

Instructions For FEC FORM 6
(48-Hour Notice of Contributions/Loans Received)

Who Must File FEC Form 6

Principal campaign committees must file 48-hour notices on contributions of $1,000 or more received after the 20th day, but more than 48 hours before 12:01 a.m. of the day of any election in which the candidate participates.

Committees may disclose these contributions on FEC Form 6 or in a letter containing the same information. Note: Principal campaign committees (except for those of Senate candidates) must file reports in an electronic format under 11 CFR 104.18 if they have either received contributions or made expenditures in excess of $50,000, or if they have reason to expect that they will exceed either of those thresholds during the calendar year. See the instructions for Form 3, Report of Receipts and Disbursements, for more information about when committees have reason to expect they will exceed the electronic filing thresholds. If the committee has reached this level of activity, DO NOT FILE THIS FORM ON PAPER. Instead, you must file this form in an electronic format. Contact the FEC for more information on filing electronically.

The 48-hour notice requirement applies to all types of elections—primary, convention, general, runoff and special—and even when a candidate is unopposed in an election.

This requirement applies to all contributions of $1,000 or more, including:

- Monetary and in-kind contributions;
- Guarantees and endorsements of bank loans;
- Loans (other than bank loans);
- Advances;
- Contributions, personal loans, endorsements of bank loans and advances made by the candidate; and
- Candidate draws on personal credit cards.

The 48-hour notice requirement does not apply to contributions that have been previously disclosed on reports filed by the committee.

Special Notice When Millionaires' Amendment is in Effect: The 48-hour notice requirement for candidate contributions, candidate personal loans, candidate advances, or endorsements of loans from a lending institution by the candidate of $1,000 or more received after the 20th day but more than 48 hours before 12:01 a.m. on the day of the election, may be satisfied by filing an FEC Form 10, 24-Hour Notice of Expenditure of Personal Funds, in the limited circumstance where those same receipts are instead disclosed on FEC Form 10 within the same time frame. Please note that FEC Form 10 must be filed within 24 hours after the date of receipt if the threshold for the Millionaires' Amendment is exceeded. See 11 CFR 400.21, 400.22 and the instructions for FEC Form 10 for more information. (Please note that the Millionaires' Amendment only applies to House and Senate candidates.)

Example: Eighteen days before his primary election, Joe Candidate loans $500,000 from his personal funds to his campaign. Because the amount is over $1,000 and the loan was made after the 20th day but more than 48 hours before the election, Joe's campaign must file Form 6 to disclose the last-minute contribution. 11 CFR 104.5(f). Since the candidate's loan exceeds the personal funds threshold amount (i.e., $350,000 for a House campaign), Joe's campaign must also file Form 10 within 24 hours to disclose his expenditure of personal funds. 11 CFR 400.21. In this limited circumstance, where the same expenditure triggers the requirement to file both Form 6 and Form 10, the campaign need only file Form 10 (within 24 hours), checking box 13a and providing the required information to fulfill the Form 6 filing requirement.

When to File

FEC Form 6 must be received by the federal and state (where required) filing offices within 48 hours after a campaign's receipt of any contribution of $1,000 or more received after the 20th day, but more than 48 hours before, the date of any election in which the candidate participates. A postmark date is not significant for purposes of filing on time. If filed electronically, the form must be received and validated by the Commission's computer system on or before 11:59 p.m. Eastern Standard/Daylight Savings Time on the prescribed filing date. Committees that are not required to file electronically may file this form either electronically or via facsimile machine to the numbers listed below.

Where to File

Senate candidate committees file with the Secretary of the Senate.

Secretary of the Senate
Office of Public Records
232 Hart Senate Office Building
Washington, DC 20510-7116
Fax number for
Secretary of the Senate:
(202) 224-1851.

All other candidate committees file with the FEC.

Federal Election Commission
999 E Street, NW
Washington, DC 20463
Fax number for FEC:
(202) 219-0174

ATTACHMENT 2
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Principal candidate committees of House candidates in Guam or Puerto Rico must file a copy of this form in their territory. Presidential candidate committees must simultaneously file copies of this form with the appropriate state officer in Guam or Puerto Rico if the committee has made expenditures in those territories. As of August 2001, these territories had not qualified for the Commission's state filing waiver program.

What to Report

Fill in the information requested in the spaces provided.

Lines 1-4. Include the name and address of the committee, name of the candidate, the office sought by the candidate and your committee's FEC identification number.

For each contribution of $1,000 or more, provide the following information for each contributor:

- •Full name (including first name, middle name or initial, if available, and last name);
- •Mailing address;
- •Occupation and name of employer;
- •Date of receipt; and
- •Amount of contribution.

In the case of contributions from any other person (including contributions from political committees), provide the contributor's full name and address, the date of receipt and the amount of the contribution.

The committee must itemize the contributions and [illegible] a second time in the first report filed after the election.

ATTACHMENT 2
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