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19L-28

#### REPORTS ANALYSIS DIVISION REFERRAL

#### TO

#### OFFICE OF GENERAL COUNSEL

DATE: August 28, 2019

ANALYST: Nataliya Ioffe

I. COMMITTEE: McSally for Senate Inc.

C00666040

Paul Kilgore, Treasurer

P.O. Box 19128

Tucson, Arizona 85710

II. RELEVANT STATUTE: 52 U.S.C. § 30104 (b)(2)

52 U.S.C. § 30116(a) and (f)

11 CFR § 103.3 11 CFR § 104.3(a)

#### III. BACKGROUND:

Excessive, Prohibited and Other Impermissible Contributions (Failure to Refund, Redesignate, or Reattribute Excessive Contributions within the Permissible Timeframe)

McSally for Senate Inc. ("the Committee") received excessive contributions totaling \$52,300.00 during the 2017-2018 election cycle from twenty (20) individuals. The Committee refunded or reattributed all of these contributions outside of the permissible timeframe.

### 2018 12 Day Pre-General Report

During the 2018 12 Day Pre-General reporting period, the Committee received excessive contributions totaling \$21,600.00 from eight (8) individuals that were not refunded, reattributed or redesignated within the permissible timeframe (Attachment 2).

On October 25, 2018, the Committee filed its 2018 12 Day Pre-General Report, covering the period from October 1 through October 17, 2018 (Image 201810259131065019). The report disclosed excessive and apparently prohibited

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contributions totaling \$25,800.00 from ten (10) individuals and two (2) limited liability companies (LLCs). The report disclosed memo text indicating remedies for some of these contributions.

On January 23, 2019, the Committee filed an Amended 2018 12 Day Pre-General Report (Image 201901239143935219). This amendment disclosed a correction to the contributor name for a contribution from one (1) individual that previously appeared excessive.

On February 5, 2019, a Request for Additional Information ("RFAI") referencing the Amended 2018 12 Day Pre-General Report, received on January 23, 2019, was sent to the Committee. The RFAI noted the receipt of excessive and apparently prohibited contributions and the Committee's explanation of corrective action taken for some of the contributions, and requested that the Committee refund, reattribute, or redesignate these contributions (Image 201902050300030217).

On March 4, 2019, the Committee filed an FEC Form 99 (Miscellaneous Electronic Submission) in response to the RFAI referencing the Amended 2018 12 Day Pre-General Report, received on January 23, 2019. The FEC Form 99 stated, in part:

"1. When our committee receives a contribution that exceeds a donor?s [sic] contribution limit, we attempt to reattribute the excess funds to the donor?s [sic] spouse, where applicable. If the donor does not respond to the reattribution request within the 60-day window allowed by the FEC, the excess funds are refunded. The excessive donations listed on this RFAI have all been addressed either on the recently filed 2018 Year End Report or on the upcoming 2019 April Quarterly Report as follows:

Excess Donations Refunded:

Heitz, Lawerence - \$1300 on 2/11/19 Krieble, Helen - \$2700 on 1/7/19 Lavinia, Robert - \$2700 on 2/11/19 Leonard, Steven - \$2690 on 2/11/19 Mooney, Michael - \$2000 on 1/7/19 Morris, Donna - \$5400 on 1/7/19 Neal, Darrell - \$2700 on 2/11/19

Stewart, Beverly - \$2400 on 1/7/19

#### Not Excessive:

Allender, Patrick ? [sic] The 10/11/18 contribution was from John William Allender, and mistakenly reported under Patrick

Allender on our original report. This error was corrected on this Amended Report, filed 1/23/19.

Petznick, Earl ? [sic] Earl Petznick and Earl Petznick Jr. are different people, and therefore not excessive.

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2. When our committee received a contribution from a business entity, we attempt to contact the donor to verify that the funds are for [sic] permissible sources, and if so, how that contribution should be allocated amongst the participating partners. The entities listed on this RFAI verified themselves as a partnership or sole proprietorship. The partner allocations were included on this Amended Report, filed 1/23/19" (Image 201903049145600595).

On April 15, 2019, the Committee filed its 2019 April Quarterly Report, covering the period from January 1 through March 31, 2019 (Image 201904159146190234). The report disclosed the refunds of excessive contributions to eight (8) individuals, detailed in the FEC Form 99, received on March 4, 2019. All of these remedies were made outside the permissible timeframe (Attachment 2).

### 2018 30 Day Post-General Report

During the 2018 30 Day Post-General reporting period, the Committee received excessive contributions totaling \$30,700.00 from twelve (12) individuals that were not refunded, reattributed, or redesignated within the permissible timeframe (Attachment 2).

On December 6, 2018, the Committee filed its 2018 30 Day Post-General Report, covering the period from October 18 through November 26, 2018 (Image 201812069134722687).

On January 23, 2019, the Committee filed an Amended 2018 30 Day Post-General Report (Image 201901239143937684). The report disclosed excessive contributions totaling \$116,667.50 from fifty-nine (59) individuals. The report disclosed memo text indicating remedies for some of these contributions.

On January 28, 2019, a Request for Additional Information ("RFAI") referencing the 2018 30 Day Post-General Report was sent to the Committee. The RFAI noted the receipt of excessive contributions and the Committee's explanation of corrective action taken for some of the contributions, and requested that the Committee refund, reattribute, or redesignate these contributions (Image 201901280300029763).

On January 31, 2019, the Committee filed its 2018 Year-End Report, covering the period from November 27 through December 31, 2018 (Image 201901319144477020). The report disclosed reattributions of excessive contributions from ten (10) individuals and refunds of excessive contributions from nine (9) individuals cited in the January 28, 2019 RFAI. All of these remedies were made within the permissible timeframe.

On March 4, 2019, the Committee filed an FEC Form 99 in response to the RFAI referencing the Amended 2018 30 Day Post-General Report, received on January 23, 2019. The Form 99 stated, in part:

"When our committee receives a contribution that exceeds a donor?s [sic] contribution limit, we attempt to reattribute the excess funds to the donor?s

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[sic] spouse, where applicable. If the donor does not respond to the reattribution request within the 60-day window allowed by the FEC, the excess funds are refunded. The excessive donations listed on this RFAI have all been addressed either on the recently filed 2018 Year End Report or on the upcoming 2019 April Quarterly Report as follows:

**Excess Donations Refunded:** 

Adler, Elizabeth - \$7300 on 1/7/19

Ainley, Pat - \$2375 on 2/4/19

Barkley, Robert - \$2700 on 12/13/18

Barthelemy, Joel - \$2000 on 2/4/19

Beckwith, George - \$1700 on 1/7/19

Burns, Richard - \$300 on 2/4/19

Chazen, Stephen - \$2700 on 2/4/19

Childs, John - \$2700 on 2/4/19

Combs, Frances - \$5400 on 2/4/19

Davidson, Gary - \$2300 on 1/7/19

Day, Marlyn - \$2700 on 12/13/18

DeSilva, Pathmanath - \$1612.50 on 1/7/19

Diaz, Charles - \$1700 on 12/3/18

Dolan, Kari - \$80 on 11/20/18<sup>1</sup>

Dolan, William - \$2300 on 2/4/19

Fisher, Michael - \$700 on 1/7/19

Fleetham, Jeffrey - \$50 on 1/7/19

Francis, Jay - \$2700 on 1/7/19

French, Daniel - \$300 on 1/7/19

Hansen, Randy - \$2700 on 2/4/19

Hawk, Leo - \$1500 on 1/7/19

Hillstrom, Bradley - \$500 on 1/7/19

Hirsch, Thomas - \$700 on 12/3/18

Hoehn, Robert - \$1000 on 12/13/18

Hogan, Patrick - \$2700 on 1/7/19

Horn, Matthew - \$5400 on 1/7/19

Hutt, Robert - \$1000 on 12/3/18

Johnson, Joanne - \$1000 on 11/30/18

Kalil, George - \$300 on 1/7/19

Kasper, Van - \$500 on 1/7/19

Kroiz, Harvey - \$2700 on 1/7/19

Laffoon, Howard - \$500 on 12/13/18

Lahood, Nabeeh - \$5000 on 1/7/19

Martori, Stephen - \$1700 on 2/4/19

Mathews, Gilbert - \$1250 on 1/7/19

Melli, Ali - \$2700 on 1/7/19

Mellott, Herman - \$1300 on 1/7/19

Milde, Leslie - \$2000 on 1/7/19

<sup>&</sup>lt;sup>1</sup> This contribution refund was part of the unitemized total for Line 20(a) (Refunds of Contributions from Individuals) of the Detailed Summary Page of the 2018 30 Day Post-General Report.

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> Moran, Frank - \$2900 on 2/4/19 O?Leary [sic], George - \$2700 on 1/7/19 Olyan, Jeffrey - \$2700 on 12/3/18 Randall, Dicki - \$2300 on 2/4/19 Sackman, Alan - \$2700 on 1/7/19 Simonton, Scott - \$2700 on 1/7/19 Topper, Lewis - \$2300 on 2/4/19 Turner, John - \$2700 on 1/7/19 Ulm, William - \$2700 on 1/7/19

Reattributed Excess to Spouse:

Blann, Thomas - \$300 to Oleta Blann on 12/10/18
Doty, William - \$50 to Patricia Doty on 12/31/18
Hansen, Michael - \$300 to Nancy Hansen on 12/23/18
Harlfinger, Charles - \$1300 to Anita Harlfinger on 12/18/18
Hobson, Carol - \$2700 to Soleil Dolce on 12/18/18
Kress, Donald - \$950 to Carol Kress on 11/27/18
Legasey, Ted - \$300 to Patricia Legasey on 12/3/18
Lewis, George - \$2700 to Jeanne Lewis on 12/17/18
Mills, Sonja - \$2700 to Owen Mills on 11/27/18
Rothe, Edward - \$2700 to Pamela Rothe on 12/17/18

#### Not Excessive:

Babinec, Albert ? [sic] These are 2 different donors. Albert Babinec Jr. gave \$2700 on 1/23/18, and Albert Babinec Sr. gave \$2700 on 11/6/18. These donors have the same address.

Hallman, Hugh ? [sic] The 10/23/18 transfer memo was designated incorrectly. Our committee is currently undergoing a software data conversion and will amend this report to correct this contribution as soon as we are able (Image 201903049145600613).

On April 12, 2019, the Committee filed its second Amended 2018 30 Day Post-General Report (Image 201904129146094356). This report included a correction to the election designation for a contribution from one (1) individual referenced in the FEC Form 99, received on March 4, 2019.

On April 15, 2019, the Committee filed its 2019 April Quarterly Report, covering the period from January 1 through March 31, 2019 (Image 201904159146190234). The report disclosed the reattributions and refunds of excessive contributions from thirty-seven (37) individuals, detailed in the Form 99, received on March 4, 2019. Remedies to all but \$30,700.00 in contributions from twelve (12) individuals were made within the permissible timeframe (Attachment 2).

On June 7, 2019, the Reports Analysis Division (RAD) Analyst called Paul Kilgore, the Committee's Treasurer, to inform him that the Committee could be referred to another Commission office for potential further action due to excessive contributions not remedied

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within the permissible timeframe. The RAD Analyst indicated these excessive contributions were received during the 2018 12 Day Pre-General and 30 Day Post-General reporting periods. The Analyst acknowledged the Committee's responses to the RFAIs concerning these contributions and explained that some of the remedies were made outside of the permissible timeframe. The Analyst asked the Committee to research the remedies to ensure the information reported in the amended reports and FEC Form 99s was complete and correct, and encouraged the Committee to submit any additional information (Attachment 3).

On June 20, 2019, the RAD Analyst made a follow-up call to Mr. Kilgore. The Analyst left a voicemail message concerning the referable issue of excessive contributions, received during the 2018 12 Day Pre-General and 30 Day Post-General reporting periods (Attachment 3).

On June 21, 2019, Megan Brown, a consultant for the Committee, contacted the RAD Analyst in response to the Analyst's call to Mr. Kilgore. Ms. Brown explained that while the Committee made some of the remedies of excessive contributions within the permissible timeframe, the others fell outside of the timeframe because the Committee did not receive the RFAIs until late January and early February 2019. The Analyst encouraged the Committee to file an FEC Form 99 to provide an additional explanation. Ms. Brown stated she would check with Mr. Kilgore about whether to submit an additional FEC Form 99 (Attachment 3).

On July 23, 2019, RAD Management left voicemail messages for Mr. Kilgore and Ms. Brown stating that the issue of excessive contributions would be referred for further action. RAD Management indicated that if the Committee would like to provide additional information about remedies, they should file it as soon as possible (Attachment 3).

On July 26, 2019, Mr. Kilgore contacted RAD Management concerning the excessive contributions. Mr. Kilgore asked for a clarification on the reason for the referral, since all excessive contributions were remedied. RAD Management explained that contributions totaling \$52,300 from twenty (20) individuals were refunded or reattributed outside of the permissible timeframe. At Mr. Kilgore's request, RAD Management emailed him a chart listing the contributions that were remedied late (Attachment 3).

To date, no further communications have been received from the Committee regarding this matter.

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|         | O-Index (2019-2020)                                                                                                                                                                               |     |           |      |                    |            |           |              |             |             |             |             |       |       |               |
|---------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-----------|------|--------------------|------------|-----------|--------------|-------------|-------------|-------------|-------------|-------|-------|---------------|
|         | Cmte. ID: C00666040 Cmte. Name: MCSALLY FOR SENATE INC                                                                                                                                            |     |           |      |                    |            |           |              |             |             |             |             |       |       |               |
|         | Treasurer Name: KILGORE, PAUL Address: PO BOX 19128, TUCSON, AZ 85710 Cmte. Type: S (SENATE) Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: QUARTERLY FILER |     |           |      |                    |            |           |              |             |             |             |             |       |       |               |
| Form Tp | Rpt Tp                                                                                                                                                                                            | A/I | Recpt Dt  | Pgs  | Begin Img#         | Beg Cvg Dt |           | Lttr Mail Dt | Begin Cash  | Recpts      | Disb        | End Cash    | Debts | Loans | Debts & Loans |
| MS-T    |                                                                                                                                                                                                   |     | 3/4/2019  | 1    | 201903049145600594 |            |           |              | -           | -           | -           | -           | -     | -     | -             |
| MS-T    |                                                                                                                                                                                                   |     | 3/4/2019  | 1    | 201903049145600595 |            |           |              | -           | -           | -           | -           | -     | -     | -             |
| MS-T    |                                                                                                                                                                                                   |     | 3/4/2019  | 2    | 201903049145600613 |            |           |              | -           | -           | -           | -           | -     | -     | -             |
| F3N     | Q1                                                                                                                                                                                                | N   | 4/15/2019 | 968  | 201904159146190234 | 1/1/2019   | 3/31/2019 |              | \$923,793   | \$2,099,485 | \$914,363   | \$2,108,915 | -     | -     | \$0           |
| F3N     | Q2                                                                                                                                                                                                | Ν   | 7/15/2019 | 2567 | 201907159150864613 | 4/1/2019   | 6/30/2019 |              | \$2,108,915 | \$3,399,992 | \$1,132,196 | \$4,376,711 | -     | -     | \$0           |
| F1A     |                                                                                                                                                                                                   | Α   | 1/8/2019  | 11   | 201901089143767255 |            |           |              | -           | -           | -           | -           | -     | -     | -             |
| F2A     |                                                                                                                                                                                                   | Α   | 1/9/2019  | 3    | 201901099143772312 |            |           |              | -           | -           | -           | -           | -     | -     | -             |
| F2A     |                                                                                                                                                                                                   | Α   | 2/15/2019 | 2    | 201902159145515908 |            |           |              | -           | -           | -           | -           | -     | -     | -             |
| F1A     |                                                                                                                                                                                                   | Α   | 2/15/2019 | 7    | 201902159145515897 |            |           |              | -           | -           | -           | -           | -     | -     | -             |
| F1A     |                                                                                                                                                                                                   | Α   | 2/5/2019  | 7    | 201902059145462613 |            |           |              | -           | -           | -           | -           | -     | -     | -             |
| F2A     |                                                                                                                                                                                                   | Α   | 2/5/2019  | 2    | 201902059145462620 |            |           |              | -           | -           | -           | -           | -     | -     | -             |
| F1A     |                                                                                                                                                                                                   | Α   | 7/5/2019  | 12   | 201907059150449348 |            |           |              | -           | -           | -           | -           | -     | -     | -             |
| F2A     |                                                                                                                                                                                                   | Α   | 7/5/2019  | 3    | 201907059150449360 |            |           |              | -           | -           | -           | -           | -     | -     | -             |
| F1A     |                                                                                                                                                                                                   | Α   | 6/21/2019 | 8    | 201906219150238411 |            |           |              | -           | -           | -           | -           | -     | -     | -             |
| F2A     |                                                                                                                                                                                                   | Α   | 6/21/2019 | 2    | 201906219150238419 |            |           |              | -           | -           | -           | -           | -     | -     | -             |
| F1A     |                                                                                                                                                                                                   | Α   | 3/6/2019  | 8    | 201903069145640287 |            |           |              | -           | -           | -           | -           | -     | -     | -             |
| F2A     |                                                                                                                                                                                                   | Α   | 3/6/2019  | 2    | 201903069145640295 |            |           |              | -           | -           | -           | -           | -     | -     | -             |
| Totals  |                                                                                                                                                                                                   |     |           |      |                    |            |           |              |             | \$5,499,478 | \$2,046,560 |             |       |       |               |

|         | O-Index (2017-2018)                                                                                                         |     |            |      |                    |            |            |           |             |             |             |             |           |       |               |
|---------|-----------------------------------------------------------------------------------------------------------------------------|-----|------------|------|--------------------|------------|------------|-----------|-------------|-------------|-------------|-------------|-----------|-------|---------------|
|         | Cmte. ID: C00666040 Cmte. Name: MCSALLY FOR SENATE INC                                                                      |     |            |      |                    |            |            |           |             |             |             |             |           |       |               |
| j       | Treasurer Name: KILGORE, PAUL Address: PO BOX 19128, TUCSON, AZ 85710                                                       |     |            |      |                    |            |            |           |             |             |             |             |           |       |               |
|         | Cmte. Type: S (SENATE) Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: QUARTERLY FILER |     |            |      |                    |            |            |           |             |             |             |             |           |       |               |
| Form Tp |                                                                                                                             | A/I | Recpt Dt   | Pgs  | Begin Img#         |            | End Cvg Dt |           | Begin Cash  | Recpts      | Disb        | End Cash    | Debts     | Loans | Debts & Loans |
| RQ2     | Q2                                                                                                                          | N   | 9/20/2018  | 3    | 201809200300020308 | 4/1/2018   | 6/30/2018  | 9/20/2018 | -           | -           | -           | -           | -         | -     | -             |
| RQ2     | 12P                                                                                                                         | N   | 9/20/2018  | 3    | 201809200300020311 | 7/1/2018   | 8/8/2018   | 9/20/2018 | -           | -           | -           | -           | -         | -     | -             |
| RQ2     | Q3                                                                                                                          | N   | 1/28/2019  | 4    | 201901280300029759 | 8/9/2018   | 9/30/2018  | 1/28/2019 | -           | -           | -           | -           | -         | -     | -             |
| RQ2     | 12G                                                                                                                         | Α   | 2/5/2019   | 5    | 201902050300030217 | 10/1/2018  | 10/17/2018 | 2/5/2019  | -           | -           | -           | -           | -         | -     | -             |
| RQ2     | 30G                                                                                                                         | Ν   | 1/28/2019  | 11   | 201901280300029763 | 10/18/2018 | 11/26/2018 | 1/28/2019 |             | -           | -           | -           | -         | -     | -             |
| F3      | Q1                                                                                                                          | Ν   | 4/13/2018  | 1110 | 201804180200293647 | 1/1/2018   | 3/31/2018  |           | \$0         | \$3,377,931 | \$799,184   | \$2,578,746 | -         | -     | \$0           |
| F3      | Q2                                                                                                                          | Ν   | 7/13/2018  | 1869 | 201807190200578891 | 4/1/2018   | 6/30/2018  |           | \$2,578,746 | \$3,292,529 | \$1,635,094 | \$4,236,182 | -         | -     | \$0           |
| F3A     | Q2                                                                                                                          | Α   | 10/16/2018 | 1885 | 201810169125551440 | 4/1/2018   | 6/30/2018  |           | \$2,578,746 | \$3,292,529 | \$1,635,094 | \$4,236,182 | -         | -     | \$0           |
| F3      | 12P                                                                                                                         | Ν   | 8/13/2018  | 891  | 201808170200693157 | 7/1/2018   | 8/8/2018   |           | \$4,236,182 | \$1,047,085 | \$3,376,292 | \$1,906,974 | -         | -     | \$0           |
| F3A     | 12P                                                                                                                         | Α   | 10/16/2018 | 896  | 201810169125553363 | 7/1/2018   | 8/8/2018   |           | \$4,236,182 | \$1,047,085 | \$3,376,292 | \$1,906,974 | -         | -     | \$0           |
| F3N     | Q3                                                                                                                          | N   | 10/15/2018 | 3202 | 201810159124982572 | 8/9/2018   | 9/30/2018  |           | \$1,906,974 | \$4,888,243 | \$3,451,549 | \$3,343,668 | \$656,583 | -     | \$656,583     |
| F3N     | 12G                                                                                                                         | N   | 10/25/2018 | 2389 | 201810259131065019 | 10/1/2018  | 10/17/2018 |           | \$3,343,668 | \$3,606,046 | \$4,426,057 | \$2,523,657 | \$253,240 | -     | \$253,240     |
| F3A     | 12G                                                                                                                         | Α   | 1/23/2019  | 2393 | 201901239143935219 | 10/1/2018  | 10/17/2018 |           | \$3,343,668 | \$3,606,046 | \$4,426,057 | \$2,523,657 | \$253,240 | -     | \$253,240     |
| F3N     | 30G                                                                                                                         | N   | 12/6/2018  | 5073 | 201812069134722687 | 10/18/2018 | 11/26/2018 |           | \$2,523,657 | \$5,620,923 | \$7,080,823 | \$1,063,757 | \$0       | -     | \$0           |
| F3A     | 30G                                                                                                                         | Α   | 1/23/2019  | 5071 | 201901239143937684 | 10/18/2018 | 11/26/2018 |           | \$2,523,657 | \$5,620,923 | \$7,080,823 | \$1,063,757 | \$0       | -     | \$0           |
| F3A     | 30G                                                                                                                         | Α   | 4/12/2019  | 6061 | 201904129146094356 | 10/18/2018 | 11/26/2018 |           | \$2,523,657 | \$5,620,923 | \$7,080,823 | \$1,063,757 | -         | -     | \$0           |
| F3N     | YE                                                                                                                          | N   | 1/31/2019  | 82   | 201901319144477020 | 11/27/2018 | 12/31/2018 |           | \$1,063,757 | \$43,610    | \$183,574   | \$923,793   | -         | -     | \$0           |
| F3A     | YE                                                                                                                          | Α   | 4/12/2019  | 65   | 201904129146101569 | 11/27/2018 | 12/31/2018 |           | \$1,063,757 | \$43,610    | \$183,574   | \$923,793   | -         | -     | \$0           |
| F2      |                                                                                                                             | Α   | 6/14/2018  | 6    | 201806210200467747 |            |            |           | -           | -           | -           | -           | -         | -     | -             |
| F1      |                                                                                                                             | Α   | 6/14/2018  | 12   | 201806210200467753 |            |            |           | -           | -           | -           | -           | -         | -     | -             |
| F6      |                                                                                                                             | N   | 8/10/2018  | 6    | 201808100200672642 |            |            |           | -           | -           | -           | -           | -         | -     | -             |

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| F6     | N | 8/12/2018  | 7  | 201808130200672741 |  | - | -            | -            | - | - | - | - |
|--------|---|------------|----|--------------------|--|---|--------------|--------------|---|---|---|---|
| F6     | N | 8/22/2018  | 9  | 201808220200714185 |  | - | -            | -            | - | - | - | - |
| F6     | N | 8/20/2018  | 5  | 201808200200699109 |  | - | -            | -            | - | - | - | - |
| F6     | N | 8/18/2018  | 11 | 201808200200699055 |  | - | -            | -            | - | - | - | - |
| F6     | Α | 8/17/2018  | 8  | 201808200200702863 |  | - | -            | -            | - | - | - | - |
| F1A    | A | 10/15/2018 | 23 | 201810159124950973 |  | - | -            | -            | - | - | - | - |
| F2A    | Α | 10/15/2018 | 6  | 201810159124956023 |  | - | -            | -            | - | - | - | - |
| F6N    |   | 10/29/2018 | 6  | 201810299133551739 |  | - | -            | -            | - | - | - | - |
| F6A    |   | 10/31/2018 | 6  | 201810319133570383 |  | - | -            | -            | - | - | - | - |
| F6N    |   | 10/31/2018 | 24 | 201810319133570389 |  | - | -            | -            | - | - | - | - |
| F6N    |   | 11/4/2018  | 12 | 201811049133587287 |  | - | -            | -            | - | - | - | - |
| F6N    |   | 11/2/2018  | 30 | 201811029133578985 |  | - | -            | -            | - | - | - | - |
| F6N    |   | 10/26/2018 | 23 | 201810269133545701 |  | - | -            | -            | - | - | - | - |
| F6N    |   | 10/27/2018 | 5  | 201810279133547797 |  | - | -            | -            | - | - | - | - |
| F1A    | Α | 12/14/2018 | 14 | 201812149143520820 |  | - | -            | -            | - | - | - | - |
| F2A    | Α | 12/26/2018 | 4  | 201812269143664726 |  | - | -            | -            | - | - | - | - |
| F2     | N | 1/11/2018  | 4  | 201801120200001290 |  | - | -            | -            | - | - | - | - |
| F1     | N | 1/11/2018  | 7  | 201801120200001294 |  | - | -            | -            | - | - | - | - |
| F6     | N | 8/16/2018  | 9  | 201808160200691761 |  | - | -            | -            | - | - | - | - |
| F6     | N | 8/14/2018  | 8  | 201808140200677813 |  | - | -            | -            | - | - | - | - |
| F6     | N | 8/24/2018  | 13 | 201808240200723130 |  | - | -            | -            | - | - | - | - |
| F6     | N | 8/26/2018  | 8  | 201808270200723704 |  | - | -            | -            | - | - | - | - |
| F6     | N | 8/27/2018  | 5  | 201808270200723724 |  | - | -            | -            | - | - | - | - |
| F1A    | А | 9/24/2018  | 20 | 201809249124236253 |  | - | -            | -            | - | - | - | - |
| F1A    | Α | 9/24/2018  | 21 | 201809249124236337 |  | - | -            | -            | - | - | - | - |
| F2N    | N | 9/24/2018  | 6  | 201809249124236331 |  | - | -            | -            | - | - | - | - |
| F6N    |   | 10/24/2018 | 20 | 201810249130849912 |  | - | -            | -            | - | - | - | - |
| F6N    |   | 10/22/2018 | 8  | 201810229130599069 |  | - | -            | -            | - | - | - | - |
| F6N    |   | 10/20/2018 | 17 | 201810209125913946 |  | - | -            | -            | - | - | - | - |
| Totals |   |            |    |                    |  |   | \$21,876,369 | \$20,952,576 |   |   |   |   |
|        |   |            |    |                    |  |   |              |              |   |   |   |   |

| O-Index (2015-2016)                                                                                                                     |  |  |  |  |  |  |  |  |  |  |  |  |
|-----------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|--|--|--|--|--|--|--|--|
| Cmte. ID: C00666040 Cmte. Name: MCSALLY FOR SENATE INC                                                                                  |  |  |  |  |  |  |  |  |  |  |  |  |
| Treasurer Name: KILGORE, PAUL Address: PO BOX 19128, TUCSON, AZ 85710                                                                   |  |  |  |  |  |  |  |  |  |  |  |  |
| Cmte. Type: S (SENATE) Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: QUARTERLY FILER             |  |  |  |  |  |  |  |  |  |  |  |  |
| Form Tp Rpt Tp A/I Recpt Dt Pgs Begin Img# Beg Cvg Dt End Cvg Dt Lttr Mail Dt Begin Cash Recpts Disb End Cash Debts Loans Debts & Loans |  |  |  |  |  |  |  |  |  |  |  |  |

No records were found for this cycle.

# McSally for Senate, Inc. (C00666040)

Apparent Excessive and Prohibited Contributions Refunded Outside Permissible Timeframes, Listed by Contributor

| Name             | Date       | Contribution<br>Amount | Election | Report                   | Excessive/Prohibited Amount Not Remedied within Timeframe | Remedied #<br>Days Since<br>Receipt |
|------------------|------------|------------------------|----------|--------------------------|-----------------------------------------------------------|-------------------------------------|
| AINLEY, PAT      | 8/31/2018  | \$100.00               | G2018    | 2018 October Quarterly   |                                                           |                                     |
| AINLEY, PAT      | 9/6/2018   | \$100.00               | G2018    | 2018 October Quarterly   |                                                           |                                     |
| AINLEY, PAT      | 9/6/2018   | \$50.00                | G2018    | 2018 October Quarterly   |                                                           |                                     |
| AINLEY, PAT      | 9/7/2018   | \$75.00                | G2018    | 2018 October Quarterly   |                                                           |                                     |
| AINLEY, PAT      | 9/8/2018   | \$100.00               | G2018    | 2018 October Quarterly   |                                                           |                                     |
| AINLEY, PAT      | 9/14/2018  | \$100.00               | G2018    | 2018 October Quarterly   |                                                           |                                     |
| AINLEY, PAT      | 9/17/2018  | \$100.00               | G2018    | 2018 October Quarterly   |                                                           |                                     |
| AINLEY, PAT      | 9/20/2018  | \$100.00               | G2018    | 2018 October Quarterly   |                                                           |                                     |
| AINLEY, PAT      | 9/22/2018  | \$100.00               | G2018    | 2018 October Quarterly   |                                                           |                                     |
| AINLEY, PAT      | 9/24/2018  | \$100.00               | G2018    | 2018 October Quarterly   |                                                           |                                     |
| AINLEY, PAT      | 9/27/2018  | \$100.00               | G2018    | 2018 October Quarterly   |                                                           |                                     |
| AINLEY, PAT      | 9/29/2018  | \$100.00               | G2018    | 2018 October Quarterly   |                                                           |                                     |
| AINLEY, PAT      | 9/30/2018  | \$75.00                | G2018    | 2018 October Quarterly   |                                                           |                                     |
| AINLEY, PAT      | 10/3/2018  | \$50.00                | G2018    | 2018 12 Day Pre-General  |                                                           |                                     |
| AINLEY, PAT      | 10/5/2018  | \$100.00               | G2018    | 2018 12 Day Pre-General  |                                                           |                                     |
| AINLEY, PAT      | 10/6/2018  | \$75.00                | G2018    | 2018 12 Day Pre-General  |                                                           |                                     |
| AINLEY, PAT      | 10/8/2018  | \$100.00               | G2018    | 2018 12 Day Pre-General  |                                                           |                                     |
| AINLEY, PAT      | 10/15/2018 | \$100.00               | G2018    | 2018 12 Day Pre-General  |                                                           |                                     |
| AINLEY, PAT      | 10/15/2018 | \$100.00               | G2018    | 2018 12 Day Pre-General  |                                                           |                                     |
| AINLEY, PAT      | 10/29/2018 | \$500.00               | G2018    | 2018 30 Day Post-General |                                                           |                                     |
| AINLEY, PAT      | 10/29/2018 | -\$100.00              | G2018    | 2018 30 Day Post-General |                                                           |                                     |
| AINLEY, PAT      | 10/30/2018 | \$250.00               | G2018    | 2018 30 Day Post-General |                                                           |                                     |
| AINLEY, PAT      | 10/31/2018 | \$500.00               | G2018    | 2018 30 Day Post-General |                                                           |                                     |
| AINLEY, PAT      | 11/1/2018  | \$125.00               | G2018    | 2018 30 Day Post-General |                                                           |                                     |
| AINLEY, PAT      | 11/1/2018  | \$250.00               | G2018    | 2018 30 Day Post-General |                                                           |                                     |
| AINLEY, PAT      | 11/2/2018  | \$100.00               | G2018    | 2018 30 Day Post-General |                                                           |                                     |
| AINLEY, PAT      | 11/3/2018  | \$250.00               | G2018    | 2018 30 Day Post-General |                                                           |                                     |
| AINLEY, PAT      | 11/4/2018  | \$250.00               | G2018    | 2018 30 Day Post-General |                                                           |                                     |
| AINLEY, PAT      | 11/5/2018  | \$250.00               | G2018    | 2018 30 Day Post-General | \$1,400.00                                                | 91                                  |
| BARTHELEMY, JOEL | 9/10/2018  | \$2,000.00             | G2018    | 2018 October Quarterly   |                                                           |                                     |

# McSally for Senate, Inc. (C00666040)

Apparent Excessive and Prohibited Contributions Not Refunded and/or Refunded Outside Permissible Timeframes, Listed by Contributor

| Name                   | Date       | Contribution<br>Amount | Election | Report                   | Excessive/Prohibited Amount Not Remedied within Timeframe | Remedied #<br>Days Since<br>Receipt |
|------------------------|------------|------------------------|----------|--------------------------|-----------------------------------------------------------|-------------------------------------|
| BARTHELEMY, JOEL       | 10/22/2018 | \$2,700.00             | G2018    | 2018 30 Day Post-General | \$2,000.00                                                | 105                                 |
| BURNS, RICHARD         | 8/31/2018  | \$1,000.00             | G2018    | 2018 October Quarterly   |                                                           |                                     |
| BURNS, RICHARD         | 8/31/2018  | \$500.00               | G2018    | 2018 October Quarterly   |                                                           |                                     |
| BURNS, RICHARD         | 10/18/2018 | \$1,000.00             | G2018    | 2018 30 Day Post-General |                                                           |                                     |
| BURNS, RICHARD         | 11/2/2018  | \$500.00               | G2018    | 2018 30 Day Post-General | \$300.00                                                  | 94                                  |
| CHAZEN, STEPHEN I. MR  | 11/12/2018 | \$2,700.00             | O2018    | 2018 30 Day Post-General |                                                           |                                     |
| CHAZEN, STEPHEN I. MR  | 11/12/2018 | \$2,700.00             | O2018    | 2018 30 Day Post-General | \$2,700.00                                                | 84                                  |
| CHILDS, JOHN           | 11/8/2018  | \$5,400.00             | O2018    | 2018 30 Day Post-General | \$2,700.00                                                | 88                                  |
| COMBS, FRANCES         | 11/8/2018  | \$2,700.00             | O2018    | 2018 30 Day Post-General |                                                           |                                     |
| COMBS, FRANCES         | 11/8/2018  | \$2,700.00             | O2018    | 2018 30 Day Post-General |                                                           |                                     |
| COMBS, FRANCES         | 11/8/2018  | \$2,700.00             | O2018    | 2018 30 Day Post-General | \$5,400.00                                                | 88                                  |
| DOLAN, WILLIAM MR.     | 11/9/2018  | \$5,000.00             | O2018    | 2018 30 Day Post-General | \$2,300.00                                                | 87                                  |
| HANSEN, RANDY MR.      | 11/9/2018  | \$5,400.00             | O2018    | 2018 30 Day Post-General | \$2,700.00                                                | 87                                  |
| HEITZ, LAWRENCE        | 2/1/2018   | \$2,000.00             | G2018    | 2018 April Quarterly     |                                                           |                                     |
| HEITZ, LAWRENCE        | 10/16/2018 | \$2,000.00             | G2018    | 2018 12 Day Pre-General  | \$1,300.00                                                | 118                                 |
| KRIEBLE, HELEN         | 8/31/2018  | \$2,700.00             | G2018    | 2018 October Quarterly   |                                                           |                                     |
| KRIEBLE, HELEN         | 10/17/2018 | \$2,700.00             | G2018    | 2018 12 Day Pre-General  | \$2,700.00                                                | 82                                  |
| LAHOOD, NABEEH DR.     | 4/1/2018   | \$1,300.00             | G2018    | 2018 July Quarterly      |                                                           |                                     |
| LAHOOD, NABEEH DR.     | 10/9/2018  | \$1,000.00             | G2018    | 2018 12 Day Pre-General  |                                                           |                                     |
| LAHOOD, NABEEH DR.     | 10/19/2018 | \$5,400.00             | G2018    | 2018 30 Day Post-General | \$5,000.00                                                | 80                                  |
| LAVINIA, ROBERT J. MR. | 9/28/2018  | \$2,700.00             | G2018    | 2018 October Quarterly   |                                                           |                                     |
| LAVINIA, BOB           | 10/17/2018 | \$2,700.00             | G2018    | 2018 12 Day Pre-General  | \$2,700.00                                                | 117                                 |
| LEONARD, STEVEN        | 9/29/2018  | \$2,700.00             | G2018    | 2018 October Quarterly   |                                                           | ĺ                                   |
| LEONARD, STEVE         | 10/17/2018 | \$2,500.00             | G2018    | 2018 12 Day Pre-General  | \$2,500.00                                                | 117                                 |
| MARTORI, STEPHEN       | 9/5/2018   | \$1,000.00             | G2018    | 2018 October Quarterly   |                                                           |                                     |
| MARTORI, STEPHEN       | 10/31/2018 | \$1,700.00             | G2018    | 2018 30 Day Post-General |                                                           |                                     |
| MARTORI, STEPHEN       | 11/1/2018  | \$1,700.00             | G2018    | 2018 30 Day Post-General | \$1,700.00                                                | 95                                  |
| MOONEY, MICHAEL        | 9/20/2018  | \$1,000.00             | G2018    | 2018 October Quarterly   |                                                           |                                     |
| MOONEY, MICHAEL        | 10/12/2018 | \$3,700.00             | G2018    | 2018 12 Day Pre-General  | \$2,000.00                                                | 87                                  |
| MORAN, FRANK S         | 9/17/2018  | \$500.00               | G2018    | 2018 October Quarterly   |                                                           |                                     |

# McSally for Senate, Inc. (C00666040)

Apparent Excessive and Prohibited Contributions Not Refunded and/or Refunded Outside Permissible Timeframes, Listed by Contributor

| Name                                             | Date       | Contribution<br>Amount | Election | Report                   | Excessive/Prohibited Amount Not Remedied within Timeframe | Remedied #<br>Days Since<br>Receipt |
|--------------------------------------------------|------------|------------------------|----------|--------------------------|-----------------------------------------------------------|-------------------------------------|
| MORAN, FRANK S                                   | 10/11/2018 | \$50.00                | G2018    | 2018 12 Day Pre-General  |                                                           |                                     |
| MORAN, FRANK S                                   | 10/11/2018 | \$1,000.00             | G2018    | 2018 12 Day Pre-General  |                                                           |                                     |
| MORAN, FRANK S                                   | 10/16/2018 | \$500.00               | G2018    | 2018 12 Day Pre-General  |                                                           |                                     |
| MORAN, FRANK S                                   | 10/22/2018 | \$250.00               | G2018    | 2018 30 Day Post-General |                                                           |                                     |
| MORAN, FRANK                                     | 10/31/2018 | \$100.00               | G2018    | 2018 30 Day Post-General |                                                           |                                     |
| MORAN, FRANK                                     | 11/1/2018  | \$1,000.00             | G2018    | 2018 30 Day Post-General |                                                           |                                     |
| MORAN, FRANK                                     | 11/2/2018  | \$500.00               | G2018    | 2018 30 Day Post-General |                                                           |                                     |
| MORAN, FRANK                                     | 11/3/2018  | \$1,000.00             | G2018    | 2018 30 Day Post-General | \$2,200.00                                                | 93                                  |
| MORRIS, DONNA                                    | 10/11/2018 | \$2,700.00             | G2018    | 2018 12 Day Pre-General  |                                                           |                                     |
| MORRIS, DONNA                                    | 10/17/2018 | \$5,400.00             | G2018    | 2018 12 Day Pre-General  | \$5,400.00                                                | 82                                  |
| NEAL, DARRELL K.                                 | 9/17/2018  | \$2,700.00             | G2018    | 2018 October Quarterly   |                                                           |                                     |
| NEAL, D. KIRK                                    | 10/17/2018 | \$2,700.00             | G2018    | 2018 12 Day Pre-General  | \$2,700.00                                                | 117                                 |
| RANDALL, DICKI                                   | 11/8/2018  | \$5,000.00             | O2018    | 2018 30 Day Post-General | \$2,300.00                                                | 88                                  |
| STEWART, BEVERLY                                 | 10/17/2018 | \$5,000.00             | G2018    | 2018 12 Day Pre-General  | \$2,300.00                                                | 82                                  |
| Total Amount Not Remedied Within Permissible Tim |            | \$52,300.00            |          |                          |                                                           |                                     |

#### MUR738000076

# McSally for Senate, Inc. (C00666040)

Breakdown of Apparent Remedied and Unremedied Prohibited and Excessive Contributions (all reports)

| Total Amount of Prohibited Receipts (all reports):                                             | \$0.00      |
|------------------------------------------------------------------------------------------------|-------------|
| Total Amount of Excessive Receipts (all reports):                                              | \$52,300.00 |
| Total Excessive/Prohibited Amount Remedied Outside of the Permissible Timeframe (all reports): | \$52,300.00 |
| Total Excessive/Prohibited Amount Unremedied (all reports):                                    | \$0.00      |
| Total Excessive/Prohibited Amount Not Remedied within Timeframe (all reports):                 | \$52,300.00 |