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September 10, 2014

Federal Election Commission
Reports Analysis Division
999 E. Street, NW Washington, DC 20463
Attention: Vicki Davis

Re: French Hill for Arkansas
Committee ID: C00551275
July Quarterly Report (05/01/2014-06/30/2014)

Dear Ms. Davis:

We are in receipt of your letter dated August 7, 2014, requesting additional information regarding the above referenced report.

Your letter indicates discrepancies with four contribution records and the required 48-hour notices for "last minute" contributions received by the Campaign. As evidenced by the Campaign filing seven 48-hour reports which reflected twenty-three contributions, the Campaign clearly attempted to meet the requirements of the 48-hour reporting period. The Campaign, however, regrets any single instance of noncompliance with the notice requirement.

With regard to the four instances raised by the Commission, we offer the following:

Arkansas Surgical Hospital LLC

A \$2,500.00 contribution from this entity was received by the Campaign via U.S. mail on Monday, May 5, 2014. In accordance with Commission regulations, the Campaign confirmed that the LLC was organized as a partnership and also obtained written instructions on how the contribution was to be attributed among the fourteen members of the LLC. This partnership attribution was reported per Commission regulations in memo items on the July Quarterly report. The attributions ranged from a low of \$27.50 to a high of \$260.00. Because none of the individual member's attribution amounts met the \$1,000.00 reporting threshold for 48-hour notices, the Campaign did not include the LLC contribution itself on a 48-hour notice. The Campaign acknowledges this may have been in error and has taken the appropriate steps as outlined below in order to ensure future compliance with Commission regulations.

Spectra Energy Corporation PAC

A \$1,000.00 contribution from this entity was received by the Campaign via U.S. mail on Saturday, May 17, 2014. Campaign staffing did not retrieve the mail until Monday, May 19, 2014, at which point the contribution was processed and because of the date no 48-hour notice was filed. The May 17, 2014, date appearing on the July Quarterly Report resulted from a misunderstanding of the date of receipt regulations for this contribution. The Campaign has taken the appropriate steps as outlined below in order to ensure future compliance with Commission regulations. Moreover, the Campaign will submit an amended July Quarterly Report with a corrected date of receipt.

The Freedom Project

A \$5,000.00 contribution from this entity was received by the Campaign via U.S. mail on Tuesday, May 20, 2014. Please note that this date corresponds with the date of disbursement reported by The Freedom Project (FEC-932999, Transaction ID - SB23-I21306). However, the date of Saturday, May 17, 2014, was inadvertently entered when the contribution was

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input into the Campaign's reporting software. We believe that a clerical error was made by Campaign staff in this instance. The Campaign discovered this error while researching the Commission's request for additional information and will submit an amended July Quarterly Report with a corrected date of receipt, which would not have required a 48-hour notice.

Williams, Jim Mr. Jr.

A \$1,000.00 contribution from this individual was received by the Campaign via online credit card submission on May 6, 2014. Due to the insufficient reporting of the Campaign's original credit card contribution processor, the Campaign failed to file the necessary 48-hour notice. Since that time, the Campaign has changed online credit card processors and is confident that future errors of this type will be avoided.

In addition to noting these four possible errors, the Commission's letter recommends that the Campaign review its procedures in order to ensure future compliance with 48-hour notice filing requirements. In response to your August 7th letter, the Campaign has made a number of procedural changes in the processing of contribution checks overall - not just to rectify 48-hour notice requirements, but to streamline check and credit card processing so that attribution and other FEC regulations are followed with specificity. Second, the Campaign has changed online credit card processors, so that online credit card charges are posted in a timely manner. This will avoid the issue with the contribution of Mr. Jim Williams, as described above. Lastly, as of August 14, 2014, the Campaign has transitioned to a new Treasurer and as a part of that transition, the Campaign has retrained staff and fundraising volunteers on the importance of compliance with the Federal Election Campaign Act and FEC regulations.

The Campaign acknowledges the seriousness of these issues, regrets the oversights, and is determined that instances such as these do not occur in the future.

The Campaign believes that this response fully addresses each issue presented in the Commission's request for additional information. In addition, the Campaign has made every effort to ensure that all information required by law is properly reported in accordance with Commission regulations.

We look forward to answering any other questions or issues that the Commission might have.

Sincerely,

Cale Turner, Treasurer
French Hill for Arkansas