

HUCK★PAC

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March 14, 2009

Mr. Brian Bennett
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Mr. Bennett:

Huck PAC, Inc. (FEC ID# C00448373) is in receipt of your Request for Additional Information dated February 13, 2009, referencing our Amended 30 Day Post General Report (10/16/08 - 11/24/08).

- With respect to the contributions identified in Item 1 of your letter, the Committee responds as follows:

The Committee took appropriate action to cure the excessive contributions within the time frame permitted by Commission regulations and reattributed the contributions prior to receiving the Commission's inquiry. Specifically, the following actions were taken with respect to each of the contributors identified in your letter:

Max Story - On October 27, 2008, the Committee sent Mr. Story a letter notifying him of the excessive contribution and requesting a reattribution of the excess to his spouse, and on the 30 Day Post General Report indicated that reattribution had been requested on the memo line. He responded to this notice on December 4, 2008, and both he and his spouse signed the reattribution form to allocate the entire \$5,000 contribution made on October 24, 2008 to Debbie Story. The reattribution is reflected on the Committee's Amended 30 Day Post General Report (FEC Filing #407479). Copies of the Committee's original correspondence and the signed reattribution form are attached.

Dennis Weinberg - On November 17, 2008, the Committee sent Mr. Weinberg a letter notifying him of the excessive contribution and requesting a reattribution of the excess to his spouse. He responded to this notice within the allowed time limit of 60 days, and both he and his spouse signed the reattribution form to allocate the entire \$2,500 contribution made on October 29, 2008 to Allyson Weinberg. The reattribution is reflected on the Committee's Amended 30 Day Post General Report (FEC Filing #407479). Copies of the Committee's original correspondence and the signed reattribution form are attached.

- With respect to the expenditures identified in Item 2 of your letter, the Committee responds as follows:

The expenditures identified as "Fundraising Materials" and "Event Venue Rental" were not made on behalf of a specific federal candidate. The expense for "Fundraising Materials" was payment for printing 500 copies of Governor Huckabee's book - 'Do the Right Thing,' which was used as part of a fundraising effort for Huck PAC. The "Event Venue Rental" expense is related to an event Huck PAC sponsored with Take '08 to encourage attendance at the Republican National Convention. Therefore, no amendments are required with respect to lines 23 or 24 of the Amended 30 Day Post General Report.

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- With respect to the expenditures identified in Item 3 of your letter, the Committee responds as follows:

Payments labeled as "Direct Mail," "Direct Mail List Purchase," and "Printing Expense," were all related to the Committee's activities and were not undertaken on behalf of any specifically identified federal candidates. These expenditures did not contain express advocacy and did not constitute voter drive activity and therefore do not qualify as either an in-kind contribution or an independent expenditure. Therefore, no amendments are required with respect to lines 23 or 24 of the Amended 30 Day Post General Report. Any public communications that, while not constituting express advocacy, referred to a federal candidate, were reported on line 21b of the Amended 30 Day Post General Report filed on December 4, 2008.

We note that on at least three prior occasions, the Commission has requested additional information related to "Fundraising Materials," "Direct Mail," and "Printing Expenses." On each of these occasions we have responded that these expenses related directly to the Committee's own activities, did not mention or refer to a federal candidate, and did not require amendment.

If the Commission has recommendations on a better way to report such expenses, we look forward to receiving your guidance. Huck PAC will gladly amend past reports to conform to these norms and will ensure that future reports are drafted in such a way as to avoid causing confusion within RAD.

As you know, the reporting community expressed its frustration at the January 14th hearing on agency procedures that Requests for Additional Information seem to be routinely issued to committees asking them to confirm that a report means what it says. We share these frustrations. Huck PAC formally requests that the portion of the RFAI to which this letter responds regarding fundraising expenses, printing and direct mail be redacted from the public record. Furthermore, we request in writing your confirmation that no so-called "audit points" have been assessed with respect to this issue.

If you have any further questions or need further clarification, please do not hesitate to contact me at (501) 978-8331.

Sincerely,



Bryan S. Jeffrey, Treasurer
Huck PAC, Inc.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

February 13, 2009

Bryan Jeffrey, Treasurer
Huck PAC
P.O. Box 2008
Little Rock, AR 72203

Response Due Date:
March 16, 2009

Identification Number: C00448373

Reference: Amended 30 Day Post General Report (10/16/08-11/24/08), received
12/4/08

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 items:

1. Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §§110.1(d) and 110.2(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3); and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

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Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

2. Please clarify all expenditures made for "Fundraising Materials" and "Event Venue Rental" on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B or E supporting Lines 23 or 24 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

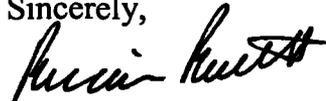
3. Schedule B discloses an expenditure(s) for "Direct Mail", "Direct Mail List Purchase", and "Printing Expense." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

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Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1140.

Sincerely,



Brian Bennett
Campaign Finance Analyst
Reports Analysis Division

20250309

Contributor Name	Date	Amount	Report
Max Story	09/11/2008	\$5,000.00	2008 October Quarterly
Max Story	10/24/2008	\$5,000.00	2008 30 Day Post General
Dennis Weinberg	04/11/2008	\$5,000.00	2008 July Quarterly
Dennis Weinberg	10/29/2008	\$2,500.00	2008 30 Day Post General

090750052060

HUCK PAC

October 27, 2008

Mr. Max Story
P.O. Box 787
Magnolia, AR 71754

Dear Mr. Story,

On behalf of Huck PAC, Inc., thank you so much for your recent contribution of \$5,000 drawn on check number 1514 and deposited October 24, 2008.

As you may be aware, individuals may contribute up to \$5,000 per year to a political action committee registered with the Federal Election Commission. Due to your previous contribution of \$5,000 on September 11, 2008, it is necessary to reallocate the amount above the \$5,000 annual limit to your spouse. If that is your intent, both you and your spouse must sign on the attached form. If that is not your intent, we must refund the excess amount donated above the annual limit. If that is the case, please note it on the attached form and return it to us.

You have reached the maximum giving level for 2008. You may not contribute any additional funds to Huck PAC, Inc. this year.

If you agree to reallocate your contribution, please sign the attached form and return it to us no later than December 23, 2008. You may return it to the address listed below, or fax it to (501) 975-2266.

Huck PAC, Inc.
c/o JPMS Cox, PLLC
11300 Cantrell Road, Suite 301
Little Rock, AR 72212

If you have any additional questions, I may be reached at (501) 978-8331.

Sincerely,



Cale Turner
Assistant Treasurer

Enclosure

Paid for by Huck PAC, Inc.
www.huckpac.com

19075003067

HUCK ★ PAC

The contribution of \$5,000 drawn on check number 1514 of the account identified as 'Max Story Building Account,' and deposited October 24, 2008 represents both of our personal funds and should be attributed as follows (**BOTH** of our signatures appear below):

Max Story - \$0 to Huck PAC, Inc.

Signature

Date

Debbie Story - \$5,000 to Huck PAC, Inc.

Signature

Date

Employer

Occupation

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www.huckpac.com

29030052062

HUCK PAC

The contribution of \$5,000 drawn on check number 1514 of the account identified as 'Max Story Building Account,' and deposited October 24, 2008 represents both of our personal funds and should be attributed as follows (**BOTH** of our signatures appear below):

Max Story - \$0 to Huck PAC, Inc.

Max Story
Signature

12/4/08
Date

Debbie Story - \$5,000 to Huck PAC, Inc.

Debbie Story
Signature

12/4/08
Date

Self
Employer

oil well serv.
Occupation

Paid for by Huck PAC, Inc.
www.huckpac.com

29030052063

HUCK PAC

November 17, 2008

Mr. Dennis Weinberg
2510 Alhambra Court
Santa Rosa Valley, VA 93012

Dear Mr. Weinberg,

On behalf of Huck PAC, Inc., thank you so much for your recent contribution of \$2,500, submitted on October 29, 2008 through www.huckpac.com.

As you may be aware, individuals may contribute up to \$5,000 per year to a political action committee registered with the Federal Election Commission. Due to your previous contribution of \$5,000 on April 11, 2008, it is necessary to reallocate the amount above the annual limit to your spouse. If that is your intent, both you and your spouse must sign and return the attached form. If that is not your intent, we must refund the excess amount donated above the annual limit. If that is the case, please note it on the attached form and return it to us.

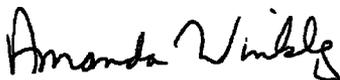
You have reached the maximum giving level for 2008 and may not contribute any additional funds to Huck PAC, Inc. this year. Allyson may still contribute \$2,500 to Huck PAC, Inc. in 2008.

If you agree to reallocate your contribution, please sign the attached form and return it to us no later than December 26, 2008. You may return it to the address listed below, or fax it to (501) 975-2266.

Huck PAC, Inc.
c/o JPMS Cox, PLLC
11300 Cantrell Road, Suite 301
Little Rock, AR 72212

If you have any additional questions, I may be reached at (501) 978-8331.

Sincerely,



Amanda Winkley
Assistant Treasurer

Enclosure

Paid for by Huck PAC, Inc.
www.huckpac.com

29030052064

HUCK PAC

The online contribution of \$2,500, submitted on October 29, 2008, represents both of our personal funds and should be attributed as follows (**BOTH** of our signatures appear below):

Dennis Weinberg - \$0 to Huck PAC, Inc.

Signature

Date

Allyson Weinberg - \$2,500 to Huck PAC, Inc.

Signature

Date

Employer

Occupation

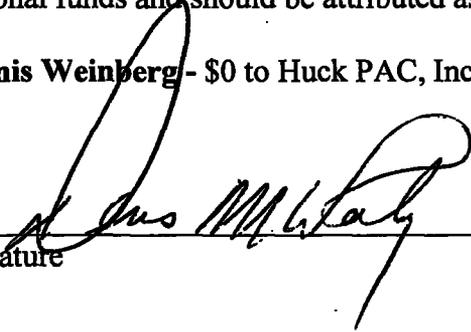
Paid for by Huck PAC, Inc.
www.huckpac.com

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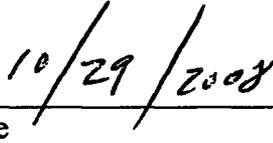
HUCK★PAC

The online contribution of \$2,500, submitted on October 29, 2008, represents both of our personal funds and should be attributed as follows (**BOTH** of our signatures appear below):

Dennis Weinberg - \$0 to Huck PAC, Inc.



Signature

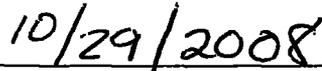


Date

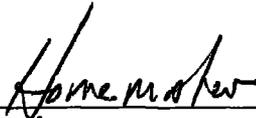
Allyson Weinberg - \$2,500 to Huck PAC, Inc.



Signature



Date



Employer

Occupation

Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
 The FEC added this page to the end of this filing to indicate how it was received.

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<input type="checkbox"/> USPS Express Mail	Postmarked
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Next Business Day Delivery <input type="checkbox"/>	
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<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked

Jms
 PREPARER
 (3/2005)

3/16/09
 DATE PREPARED