

**National Republican Senatorial Committee**  
425 Second Street NE  
Washington, DC 20075

SECRETARY OF THE SENATE  
08 JAN 14 PM 5:05

January 14, 2008

Ms. Rosa G. Lewis  
Senior Campaign Finance Analyst  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Dear Ms. Lewis:

This letter is in response to your inquiry dated December 12, 2007 in which you reference the May Monthly Report (4/1/07 – 4/30/07).

Schedule A – Line 15

The transaction from the Republican National Committee was a reimbursement for publications (See Amazon.com, April 07 Monthly Report). The transaction from Smart Media Group, LLC was a return of unused funds from a media vendor. Please see the Post General Election 2006 Report.

Schedule A - Garfield

We have attached Schedule A, Line 11a relevant to the transactions you referenced. The donors with the last name of Garfield, are, in fact, Michael H. Garfield and Michael H. Garfield, Jr. (as reported). As such, no excessive donation from either contributor resulted and the Committee properly reported the transactions.

Schedule A Best Efforts

The Committee takes the following steps to ensure compliance with 11 CFR§104.3(a)(4)(i) and 104.7:

All solicitations to prospective donors include the following statement: “Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions exceed \$200 in a calendar year.”

If the individual fails to respond to the initial request, the Committee sends a stand-alone follow-up letter, no later than thirty (30) days after receipt of the contribution,

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requesting the same information. The letter includes a pre-addressed, stamped envelope and contains the following statement:

“Federal law requires that we obtain the attached information regarding your occupation and employment. Please complete the attached form and return it to us as soon as possible in the enclosed envelope.”

The Committee then discloses any updated contributor information it receives by filing memo Schedule A's in a timely manner with its next regular report or by filing an amended report.

If the individual fails to respond to the Committee's requests, the Committee reports donor information pursuant to the guidelines in 11 CFR 104.7(b)(3) and 11 CFR 104.7(b)(4).

#### Schedule A – Occupation and Employer Information

Inasmuch as the regulations require the Committee to ask contributors to supply employer/occupation information but do not compel the contributors to comply with the Committee's requests, the Committee has reported all the information it has in its possession in an attempt to satisfy both the intent and the substance of 11 CFR 100.12, 11 CFR 104.3, and 11 CFR 104.7. In addition, the Committee can find no guidance in the statute or regulations that allow it to add to or subtract from information that is voluntarily provided to it from its contributors nor is there any indication in the statute or regulations that the descriptions referred to are inadequate listings for employer and/or occupation. Finally, the Committee notes that it updates its employer/occupation data as it is received from donors and makes every effort to secure the requested information from all available sources.

#### Schedule B – Expenditure Clarifications

No portion of the expenditures for “catering,” “direct mail expense,” “fundraising consulting,” “postage,” “printing,” “printing expense,” or “publications” were made on behalf of any specifically identified federal candidate. These expenditures were made solely on behalf of the Committee. Accordingly, no further itemization is necessary.

#### Schedule B – Line 21 B – Payments to Political Committees

The committee was reporting a payment for a fundraising charge in exactly the amount incurred by NRSC which was a payment based on the usual and normal charge for the services provided. The payment was for travel expense for Air Force One, and is the customary amount assessed to political committees by the White House Travel Office. Thus, it represents the usual and normal charge. Accordingly, there was no in-kind contribution from any of the payees reported.

#### Disbursements to Joint Fundraising Committees

The transactions to the referenced joint fundraising committees were, in fact, disbursements to vendors as advances for fundraising expenses as the Committee is permitted to do pursuant to 11 CFR 102.17(b)(3) and 11 CFR 102.6. As such, no transfers occurred and the joint fundraising committees will amend their reports to reflect the appropriate transactions (see NRSC response to FEC request for additional information dated 12/12/07 referencing the July Monthly Report).

Should you require additional information, please contact me at your convenience.

Sincerely,



Robert Jentgens  
Assistant Treasurer

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NANCY ERICKSON  
SECRETARY

PAMELA B. GAVIN  
SUPERINTENDENT

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# United States Senate

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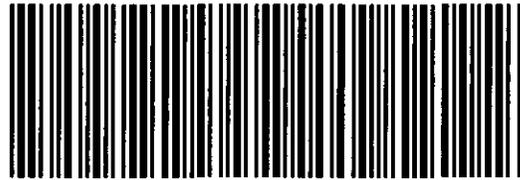
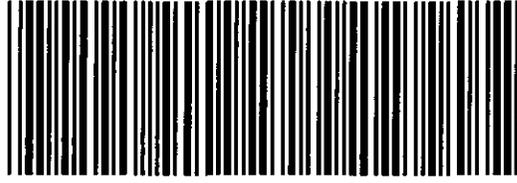
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