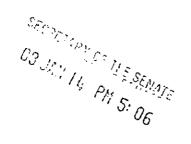
## National Republican Senatorial Committee 425 Second Street NE Washington, DC 20075



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 July Monthly Report (6/1/07 - 6/30/07).

## Schedule A – Line 15

With regard to the transactions relative to the referenced joint fundraising committees, the NRSC was reporting reimbursements of advances for fundraising expenses as it is permitted to do pursuant to 11 CFR 102.17(b)(3) and 11 CFR 102.6. The specific disbursements giving rise to the reimbursements were as follows:

Federal City Caterers, Line 21b, \$2,640.00, 4/24/07 (Graham Majority Committee)
Republican National Committee, Line 21b, \$15,000.00, 4/20/07 (Inhofe Victory Cmte.)
Republican National Committee, Line 21b, \$40,000.00, 6/8/07 (Roberts Victory Cmte.)
National Museum for Women in the Arts, Line 21b, \$1,550.00, 6/05/07 (Women Impacting the Nation)

National Museum for Women in the Arts, Line 21b, \$4,000.00, 6/12/07 (Women Impacting the Nation)

As such, the reimbursement transactions were correct as reported on line 15. The joint fundraising committee reports will be amended as necessary to reflect the correct sequence of transactions.

The Line 15 transaction from Martinez for Senate was a reimbursement for travel (See UST Public Affairs, Post-General 2004 Report).

## 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, 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).

## <u>Schedule A – Occupation and Employer Information</u>

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 A – Humphreys and Laughlin

The committee has amended Schedule A, to remove the referenced transactions from Line 11c to Line 11a(i) and has also amended the Detailed Summary Pages of the M7 – M12 monthly reports to reflect the corrections.

## Schedule B – Expenditure Clarifications

No portion of the expenditures for "catering," "direct mail expense," "facility rental," "floral arrangement expense," "office supplies/printing/paper," "fundraising consulting," "photographs," "photography services," "postage," "printing," "printing/office supplies," "printing/paper expense," "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 – Administrative Expenses

In accord with election regulations, the committee has disclosed all administrative expenses it incurred during the reporting periods covered by the reports cited. Specifically, the Committee disclosed multiple transactions of the following types on Schedule B, Line 21 of all three of the reports you reference:

Salary Payroll Taxes
Building Maintenance Security

Delivery Telephone Expenses

Equipment Maintenance Utility

Equipment Purchase Office Supplies

**Equipment Lease** 

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

Sincerely,

Robert Jentgens Assistant Treasurer

PAMELA B. GAVIN SUPERINTENDENT

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