

# HUCK PAC

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December 19, 2008

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 December 5, 2008, referencing our amended October Quarterly Report (7/1/08 - 9/30/08).

- 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 issued refunds to the individuals prior to receipt of the Commission's inquiry. Specifically, the following actions were taken with respect to each of the contributors identified in your letter:

James E. Davison - On October 16, 2008, the Committee sent Mr. Davison a letter notifying him of the excessive contribution and requesting a reattribution of the excess to his spouse. We received no response to this letter. Accordingly, on November 17, 2008, the Committee issued Mr. Davison a refund of \$2,500, within the 60 days of the initial excess contribution made on September 19, 2008. This refund issue dated November 17, 2008 is noted on Committee's Amended October Quarterly Report (FEC Filing - 390198). Copies of the original letter and the refund check are attached.

Jack F. Staten - Your letter states that Mr. Staten had an aggregate contribution of \$6,000. Please note that his actual contribution on September 30, 2008, as stated on the Committee's October Quarterly Report, was for \$2,000, not \$2,500. Therefore, his aggregate contribution was \$5,500. On October 16, 2008, the Committee sent Mr. Staten a letter notifying him of the excessive contribution and requesting a reattribution of the excess amount. Mr. Staten contacted the Committee and requested a refund of the excess contribution, so the Committee issued Mr. Staten a refund of \$500 on November 28, 2008, within the 60 days of the initial excess contribution made on September 30, 2008. This refund issue dated November 28, 2008 is noted on Committee's Amended October Quarterly Report (FEC Filing - 390198). Copies of our correspondence and the refund check are attached.

290399991294

# HUCK★PAC

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

The receipt of \$2,000 from the "Republican Party of Iowa" was a reimbursement for travel expenses incurred by the committee on behalf of the Republican Party of Iowa, not a refund of a previous contribution. The Committee paid Central Flying Services \$7,975.55 on July 17, 2008, and the Committee was reimbursed for a portion of that flight attributable to travel on behalf of the Republican Party of Iowa. We have adjusted the description of the reimbursement, as well as the description for the expenditure for which we were reimbursed on our Amended October Quarterly Report (FEC Filing - 392338).

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

The expenditure identified as "Event Venue Rental" was not made on behalf of a specific federal candidate. Huck PAC sponsored an event in honor of the Arkansas Delegation at the Republican National Convention. Therefore, no amendments are required with respect to lines 23 or 24 of the October Quarterly Report.

- With respect to the expenditures identified in Item 4 of your letter, the Committee responds as follows:

Payments labeled as "Direct Mail List Purchase," "Postage," and "Printing," 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 October Quarterly Report. Any public communications that, while not constituting express advocacy, referred to a federal candidate, were reported on line 21b of the October Quarterly report filed on October 15, 2008.

If you have any further questions or need further clarification, please do not hesitate to contact me.

Sincerely,



Bryan S. Jeffrey, Treasurer  
Huck PAC, Inc.

29039991295

# HUCK PAC

October 16, 2008

Mr. James E. Davison  
P.O. Box 607  
Ruston, LA 71273

Dear Mr. Davison,

On behalf of Huck PAC, Inc., thank you so much for your recent contribution of \$5,000, drawn on check number 6874 and deposited September 18, 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 \$2,500 on April 21, 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 November 17, 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) 978-8315.

Sincerely,



Cale Turner  
Assistant Treasurer

Enclosure

Paid for by Huck PAC, Inc.  
[www.huckpac.com](http://www.huckpac.com)

29039991296

# HUCK★PAC

The contribution of \$5,000 deposited September 18, 2008, and drawn on check number 6874 of the account identified as 'Mr. or Mrs. James E. Davison' represents both of our personal funds and should be attributed as follows (**BOTH** of our signatures appear below):

**James E. Davison** - \$2,500 to Huck PAC, Inc.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Spouse's Full Name - \$2,500 to Huck PAC, Inc.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employer

\_\_\_\_\_  
Occupation

Paid for by Huck PAC, Inc.  
[www.huckpac.com](http://www.huckpac.com)

29039991297

# HUCK PAC

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November 17, 2008

Mr. James E. Davison  
P.O. Box 607  
Ruston, LA 71273

Dear Mr. Davison,

We sent you a letter recently (copy enclosed) regarding your check contribution of \$5,000 to Huck PAC, Inc. deposited on September 18, 2008. This contribution caused you to exceed the annual contribution limit of \$5,000 set by the Federal Election Commission because you had previously contributed \$2,500 to Huck PAC. Our letter attempted to reattribute the excess portion of your contribution to your spouse, however we did not receive your response by the date indicated in our letter. Therefore, we have enclosed check number 1199 for \$2,500, which represents a refund of your excess contribution to Huck PAC, Inc.

I apologize for any inconvenience this may cause. It is important that we comply with the regulations set by the FEC. If you have any questions, please feel free to contact me at (501) 978-8331.

Sincerely,



Amanda Winkley  
Assistant Treasurer

Enclosure

Paid for by Huck PAC, Inc.  
[www.huckpac.com](http://www.huckpac.com)

29039991298

HUCKPAC/OPERATING ACCOUNT

Mr. James E. Davison

Check Number: 1199  
Check Date: Nov 17, 2008

1199

Check Amount: \$2,500.00

Discount Taken

Amount Paid

Item to be Paid - Description

Refund of excess contribution received September 18, 2008

2,500.00

HUCKPAC  
OPERATING ACCOUNT  
11300 CANTRELL ROAD, STE 301  
LITTLE ROCK, AR 72212

DELTA TRUST  
LITTLE ROCK, AR 72223

81-416/829

1199

DATE  
Nov 17, 2008

Memo Refund of Excess Contribution

AMOUNT

\$ 2500.00

Two Thousand Five Hundred and 00/100 Dollars

PAY  
TO THE  
ORDER  
OF

Mr. James E. Davison  
P.O. Box 607  
Ruston, LA 71273

AUTHORIZED SIGNATURE

HUCKPAC/OPERATING ACCOUNT

Mr. James E. Davison

Check Number: 1199  
Check Date: Nov 17, 2008

1199

Check Amount: \$2,500.00

Discount Taken

Amount Paid

Item to be Paid - Description

Refund of excess contribution received September 18, 2008

2,500.00

# HUCK★PAC

October 16, 2008

Mr. Jack Staten  
24 Cash Drive  
Mound House, NV 89706

Dear Mr. Staten,

On behalf of Huck PAC, Inc., thank you so much for your recent contributions of \$500 and \$2,000, drawn on checks 1563 and 1566, respectively. Both checks were deposited on September 30, 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 contributions totaling \$3,000, 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, or you are not married, 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 November 28, 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) 978-8315.

Sincerely,



Cale Turner  
Assistant Treasurer

Enclosure

Paid for by Huck PAC, Inc.  
[www.huckpac.com](http://www.huckpac.com)

29039991300

# HUCK★PAC

The contribution of \$500 deposited September 30, 2008, and drawn on check number 1563 of the account identified as 'Jack F. Staten' represents both of our personal funds and should be attributed as follows (**BOTH** of our signatures appear below):

**Jack Staten** - \$0 to Huck PAC, Inc.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
**Spouse's Full Name** - \$500 to Huck PAC, Inc.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employer

\_\_\_\_\_  
Occupation

Paid for by Huck PAC, Inc.  
[www.huckpac.com](http://www.huckpac.com)

29039991301

# HUCK ★ PAC

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November 28, 2008

Mr. Jack Staten  
24 Cash Drive  
Mound House, NV 89706

Dear Mr. Staten,

Per your request, we have enclosed check number 1194 for \$500 which represents a refund of your excess contribution to Huck PAC, Inc. Please keep in mind that the \$5,000 contribution limit set by the Federal Election Commission is for the 2008 calendar year; we encourage you to contribute again in 2009!

Thank you for your generous support to Huck PAC, Inc. and our efforts.

Sincerely,



Amanda Winkley  
Assistant Treasurer

Enclosure

Paid for by Huck PAC, Inc.  
[www.huckpac.com](http://www.huckpac.com)

29039991302

Mr. Jack Staten

Check Number: 1194  
Check Date: Nov 28, 2008

Check Amount: \$500.00  
Discount Taken      Amount Paid

Item to be Paid - Description

Refund of Excess Contribution

500.00

**HUCKPAC**  
**OPERATING ACCOUNT**  
11300 CANTRELL ROAD, STE 301  
LITTLE ROCK, AR 72212

DELTA TRUST  
LITTLE ROCK, AR 72223

81-416/829  
DATE  
Nov 28, 2008

1194

Memo: Refund

AMOUNT

\$ 500.00

Five Hundred and 00/100 Dollars

PAY  
TO THE  
ORDER  
OF

Mr. Jack Staten  
24 Cash Drive  
Mound House, NV 89706

*[Signature]*  
AUTHORIZED SIGNATURE

HUCKPAC/OPERATING ACCOUNT

1194

Mr. Jack Staten

Check Number: 1194  
Check Date: Nov 28, 2008

Check Amount: \$500.00

Discount Taken      Amount Paid

Item to be Paid - Description

Refund of Excess Contribution

500.00

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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Overnight Delivery Service (Specify): Shipping Date  
Next Business Day Delivery

Received from House Records & Registration Office Date of Receipt

Received from Senate Public Records Office Date of Receipt

Received from Electronic Filing Office Date of Receipt

Other (Specify): Date of Receipt or Postmarked

*EA* 1/26/09  
PREPARER DATE PREPARED

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