

HAND DELIVERED



FEC - RAD
Reports Analysis Div.

20 MAR '17 RCVD

March 16, 2017

Ms. Nicole Miller
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Identification Number: C00109017
Reference: Year-End Report (11/29/16 – 12/31/16)

Dear Ms. Miller:

This letter is in response to your February 14, 2017 Request for Additional Information (RAI), asking for additional information pertaining to General election debt retirement contributions made by the AT&T Federal PAC to "Don Bacon for Congress" and "Ted Budd for Congress." Typically, debt retirement contributions are made by the AT&T Federal PAC in response to a specific request from a candidate's committee, and, prior to making any debt retirement contributions, the AT&T Federal PAC reviews the committee's information that is publicly filed with the Federal Election Commission to confirm the committee has outstanding debt. At the time these debt retirement contributions were made; the AT&T Federal PAC conducted this due diligence process.

The AT&T Federal PAC contribution to "Ted Budd for Congress" was designated for 2016 General debt retirement; however when we contacted the campaign committee after receiving your correspondence, we were informed that upon further review of their committee's campaign finances, they only had 2016 Primary election debt. "Ted Budd for Congress" issued a refund to the AT&T Federal PAC on 3/6/17 which will be reported in our April 20 Monthly filing with the FEC.

Subsequent to receipt of your correspondence, the "Don Bacon for Congress" committee informed the AT&T Federal PAC that the FEC's analysis of their campaign's finances was incorrect as they were still receiving invoices from vendors. The campaign committee also stated that their FEC analyst informed them that acceptance of our contribution for 2016 General debt retirement was permissible. The AT&T Federal PAC therefore deems that no further action pertaining to this contribution is necessary.

Sincerely,

George B. Goeke
Treasurer, AT&T Federal PAC

Enclosure



March 9, 2017

Mr. George Geoke
AT&T Federal Political Action Committee
208 South Akard Street, Suite 1812
Dallas, TX 75202

Dear Mr. Goeke,

I want to thank you for your organization's generous donation towards retiring the debt for the Don Bacon 2016 campaign. In the last couple of months, you might have received a request for additional information (RFAI) from the FEC indicating that the Bacon campaign did not have debt.

The RFAI is not correct and your donation was properly allocated for debt relief. At the time of the memorandum, the FEC's analysis of our campaign finances was based on a snapshot in time prior to the filing of our end of the year report. Prior to the end of the year, our campaign was still receiving invoices from vendors. Following the filing of our end of the year report, our team has met with in person and communicated on the phone with the Analyst assigned to our campaign.

Our FEC Analyst has informed us that we are proper in accepting your donation for debt retirement, especially in light of our end of year report.

Please feel free to contact me with any further questions.

Sincerely,

A handwritten signature in black ink that reads "Scott Petersen". The signature is stylized, with the first name "Scott" and last name "Petersen" clearly visible.

Scott Petersen
Political Director, Team Bacon
(402) 850-3850
scott@donjbacon.com



TED BUDD FOR CONGRESS

PO BOX 97127
RALEIGH, NC 27624

BB&T
66-112/531

10001

DATE 3/6/2017

PAY
TO THE
ORDER OF

AT&T INC. FEDERAL POLITICAL ACTION

\$ **3,000.00

Three Thousand and 00/100*****

DOLLARS

AT&T INC. FEDERAL PAC
208 S. AKARD STREET
SUITE 1812
DALLAS, TX 75202

VOID AFTER 90 DAYS



MEMO

Contribution Refund

[REDACTED]

TED BUDD FOR CONGRESS

AT&T INC. FEDERAL POLITICAL ACTION

10001

Date	Type	Reference	Original Amt.	Balance Due	3/6/2017 Discount	Payment
3/6/2017	Bill		3,000.00	3,000.00		3,000.00
					Check Amount	3,000.00


BB&T

Contribution Refund

3,000.00

2017-03-06 11:00:00 AM

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.

<input checked="checked" type="checkbox"/> Hand Delivered	Date of Receipt 3/20/17
<input type="checkbox"/> USPS First Class Mail	Postmarked Date of Receipt
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
<input type="checkbox"/> USPS Priority Mail Express	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date Next Business Day Delivery <input type="checkbox"/>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
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<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
 PREPARER	3/20/17 DATE PREPARED

(3/2015)

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