



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

June 1, 2012

BOB MCCOMBS, TREASURER
DENTON COUNTY REPUBLICAN VICTORY
FUND
1013 N ELM ST
DENTON, TX 76201

Response Due Date
07/06/2012

IDENTIFICATION NUMBER: C00412569

REFERENCE: APRIL QUARTERLY REPORT (01/01/2012 - 03/31/2012)

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 4 item(s):

1. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer and occupation entries appear on your report and are not considered acceptable: "self-employed/Business Owner" and "self=employed/Business Owner"

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable

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statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

2. Schedule A of your report (see attached) discloses one or more contributions from an organization(s), which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. § §441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying

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information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible.

To the extent that your committee has received prohibited funds, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited 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, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. (11 CFR §103.3(b)(1))

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of your check for any transfer out or refund. Should you choose to transfer out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring out or refunding the amounts will be taken into consideration.

3. On Schedule(s) H4 supporting Line(s) 21(a) of the Detailed Summary Page, you have not included a mailing address for the payment made to "Dick Morris". Please amend your report accordingly. (11 CFR §§104.10(b)(4) and 104.17(b)(3))

4. Schedule H4 of your report discloses reimbursements to individuals for "Air Fare for Speaker", "Balloons", "Bid Sheets for Auction", "Business Cards", "Items to Auction for Fund" and "Supplies for Fund Raiser." Please be advised that when itemizing reimbursements to individuals for goods or services, payment to the original vendors must be itemized as memo entries regardless of amount. Each memo entry must include the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information and clearly identify on the Schedule H4, which reimbursement each memo entry relates to. (11 CFR §§104.10 and 104.17, and Advisory Opinions 1992-1 and 1996-20, footnote 3)

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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) 694-1141.

Sincerely,



Daniel Buckley
Senior Campaign Finance Analyst
Reports Analysis Division

**Excessive, Prohibited, and Impermissible Contributions
Denton County Republican Victory Fund (C00412569)**

Contributions from Unregistered Organizations

Contributor Name	Date	Amount	Report
Benny Parkey Campaign	1/17/12	\$1,250.00	2012 April Quarterly
Benny Parkey Campaign	1/27/2012	\$300.00	2012 April Quarterly
Bobbie Mitchell Campaign	2/10/12	\$1,000.00	2012 April Quarterly
Bobbie Mitchell Campaign	2/10/12	\$2.00	2012 April Quarterly
Bobbie Mitchell Campaign	2/10/12	\$46.00	2012 April Quarterly
Bobbie Mitchell Campaign	2/25/12	\$110.00	2012 April Quarterly
Bobbie Mitchell Campaign	2/25/12	\$35.00	2012 April Quarterly
Bobbie Mitchell Campaign	3/16/12	\$45.00	2012 April Quarterly
Christi Craddick Campaign	2/27/12	\$350.00	2012 April Quarterly
Craig Estes Campaign	1/17/12	\$5,000.00	2012 April Quarterly
Dianne Edmondson Campaign	2/27/12	\$1,000.00	2012 April Quarterly
Douglas Robison Campaign	2/6/12	\$2,500.00	2012 April Quarterly
Douglas Robison Campaign	2/27/12	\$400.00	2012 April Quarterly
Friends of Barry Smitherman	3/15/12	\$350.00	2012 April Quarterly
Friends of Senator Jane Nelson	1/9/12	\$1,715.00	2012 April Quarterly
Friends of Senator Jane Nelson	2/27/12	\$2,250.00	2012 April Quarterly
Friends of Senator Jane Nelson	2/27/12	\$75.00	2012 April Quarterly
Frisco Area Republicans	2/10/12	\$1,520.00	2012 April Quarterly
Golden Corridor Republican Women	1/27/12	\$760.00	2012 April Quarterly
Hal Grant Campaign	1/27/12	\$300.00	2012 April Quarterly
Hal Grant Campaign	2/27/12	\$1,250.00	2012 April Quarterly
Hal Grant Campaign	2/27/12	\$100.00	2012 April Quarterly
Hal Grant Campaign	3/15/12	\$100.00	2012 April Quarterly
Mary Horn Campaign	1/9/12	\$2,500.00	2012 April Quarterly
Mary Horn Campaign	2/14/12	\$300.00	2012 April Quarterly
Mary Horn Campaign	2/27/12	\$293.00	2012 April Quarterly

**Excessive, Prohibited, and Impermissible Contributions
Denton County Republican Victory Fund (C00412569)**

Contributions from Unregistered Organizations (continued)

Contributor Name	Date	Amount	Report
Michael Truitt Campaign	2/14/12	\$1,000.00	2012 April Quarterly
Michael Truitt Campaign	2/14/12	\$350.00	2012 April Quarterly
Michael Truitt Campaign	2/27/12	\$500.00	2012 April Quarterly
Michelle French Campaign	1/20/12	\$1,250.00	2012 April Quarterly
Michelle French Campaign	3/30/12	\$50.00	2012 April Quarterly
Michelle French Campaign	3/30/12	\$100.00	2012 April Quarterly
Mike Brucia Campaign	2/1/12	\$1,250.00	2012 April Quarterly
Mike Brucia Campaign	2/21/12	\$10.00	2012 April Quarterly
Mike Brucia Campaign	3/21/12	\$10.00	2012 April Quarterly
Parker Campaign	3/15/12	\$1,250.00	2012 April Quarterly
Ronald Simmons Campaign	1/9/12	\$2,500.00	2012 April Quarterly
Ronald Simmons Campaign	3/19/12	\$25.00	2012 April Quarterly