



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 15, 2007

Lin S. Howard, Treasurer
Friends of Fred Thompson Inc.
1130 8th Avenue South
Nashville, TN 37203

**Response Due Date:
December 17, 2007**

Identification Number: C00438507

Reference: October Quarterly Report (6/4/07 – 9/30/07)

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 2 items:

1. Schedule A-P of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached). You should examine all of your contributions to check for additional excessive contributions. The Committee's procedures for processing contributions should also be reviewed.

An individual or a political committee other than an authorized committee or qualified multi-candidate committee may not make a contribution to a candidate for federal office in excess of \$2,300 per election. An authorized committee may not make a contribution to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (2 U.S.C. §§ 441a(a) and (f); 11 CFR §§ 110.1(b), (e) and (k))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information. If any contribution you received exceeds the limits, you may have to refund the excessive amount.

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Excessive contributions may be retained if within sixty (60) days of receipt, the excessive portions are properly redesignated or reattributed. Guidelines for each option are provided below:

For reattributions, excessive contributions from individuals can be retained, if within sixty (60) days of receipt, the excessive amount is properly reattributed to another person. Please note that reattributions only apply to excessive contributions from individuals. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written documentation, signed by each contributor, authorizing a reattribution and indicating the amount of the contribution to be attributed to each contributor, or (2) the committee reattributes, by presumption, the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

For redesignations, the funds can be retained if within sixty (60) days of receipt the excessive amount is properly redesignated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election, or (2) your committee redesignates by presumption the excessive portion of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) Please note that you cannot presumptively redesignate an excessive contribution from a multi-candidate committee. Also, a contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt of the contribution, the excessive amount must be refunded. See 11 CFR § 103.3(b)(3).

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Please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/ or letters reattributing or redesignating the contributions in question. Refunds are reported on Line 28 of the Detailed Summary Page and on a supporting Schedule B-P of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A-P of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR §§ 104.8(d)(2), (3) and (4))

The acceptance of excessive contributions is a serious problem. Again, the committee's procedures for processing contributions should be examined and corrected in order to avoid this problem. Although the Commission may take further legal action, prompt action by you to refund, redesignate, and/or reattribute of the excessive amount will be taken into consideration.

2. Schedule B-P of your report discloses reimbursements to staff for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by staff to any one vendor that make up the reimbursement may have to be itemized. For example, if the campaign related payments to any one vendor by the campaign/staff aggregate in excess of \$200 for the election cycle, the staff advance payment to the vendor must also be itemized in a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and detailed purpose of the advance. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must indicate so in an amendment to this report. Please amend your report to include the missing or clarifying information. See AO 1996-20 for additional clarification. (11 CFR § 104.9)

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.**

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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) 694-1175.

Sincerely,



Travis F. Brown
Senior Campaign Finance Analyst
Reports Analysis Division

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Excessive and/or Prohibited Contributions
 Friends of Fred Thompson Inc. (C00438507)
 October Quarterly Report (6/4/07 - 9/30/07)

P = Primary Election
 G = General Election

CONTRIBUTOR NAME		DATE	AMOUNT	ELECTION
AMIOT	CAROLYN E.	8/23/2007	\$4,600.00	P2008
AMIOT	CAROLYN E.	6/14/2007	\$250.00	P2008
ANDERSON	GREGORY	9/15/2007	\$1,000.00	P2008
ANDERSON	GREGORY	9/28/2007	\$2,000.00	P2008
AUGHTRY III	PAUL C.	9/18/2007	\$2,500.00	P2008
AUSTIN	TANI D.	8/29/2007	\$4,600.00	P2008
BUNCH	WILLIAM J.	7/31/2007	\$2,300.00	P2008
BUNCH	WILLIAM J.	9/17/2007	\$2,000.00	P2008
BURCHETTE	SUE ANN	9/25/2007	\$4,600.00	P2008
BURCHETTE	WILLIAM	9/25/2007	\$4,600.00	P2008
CARSWELL	BENJAMIN	8/31/2007	\$4,600.00	P2008
CHILDS	WILLIAM	8/30/2007	\$249.00	P2008
CHILDS	WILLIAM	9/6/2007	\$2,300.00	P2008
COKER	HAROLD	8/31/2007	\$2,300.00	P2008
COKER	HAROLD	9/11/2007	\$2,300.00	P2008
COKER	HAROLD	6/30/2007	\$2,300.00	P2008
COOPER.	CHARLES	9/10/2007	\$2,000.00	P2008
COOPER	CHARLES	9/27/2007	\$1,300.00	P2008
CROCKETT JR.	MOTON H.	9/18/2007	\$1,000.00	P2008
CROCKETT JR.	MOTON H.	9/30/2007	\$2,300.00	P2008
DAVIS	JOHN M.	8/21/2007	\$100.00	P2008
DAVIS	JOHN M.	9/6/2007	\$2,300.00	P2008

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CONTRIBUTOR NAME		DATE	AMOUNT	ELECTION
FARBER	WILDA D.	8/24/2007	\$200.00	P2008
FARBER	WILDA D.	9/30/2007	\$2,300.00	P2008
FITZGERALD	PATRICK D.	9/6/2007	\$4,600.00	P2008
FLORES	JIM	9/18/2007	\$4,600.00	P2008
FREEMAN	JAMES E.	8/31/2007	\$4,600.00	P2008
GABLE	JAMES E.	9/28/2007	\$2,000.00	P2008
GABLE	JAMES E.	6/30/2007	\$2,000.00	P2008
GODWIN	J.	8/8/2007	\$2,500.00	P2008
HARDEMAN	BRYAN	6/12/2007	\$2,000.00	P2008
HARDEMAN	BRYAN	9/24/2007	\$2,300.00	P2008
HASLAM	WILLIAM E.	8/21/2007	\$4,600.00	P2008
HASLAM	WILLIAM E.	6/13/2007	\$2,300.00	P2008
HEATON	JAMES W.	9/6/2007	\$4,600.00	P2008
HEHNER	CONNIE	8/22/2007	\$1,000.00	P2008
HEHNER	CONNIE	6/6/2007	\$1,000.00	P2008
HEHNER	CONNIE	9/17/2007	\$1,000.00	P2008
HEHNER	CONNIE	7/3/2007	\$1,000.00	P2008
HERON	LEON C.	8/20/2007	\$2,300.00	P2008
HERON	LEON C.	9/25/2007	\$1,150.00	P2008
HERON	LEON C.	9/29/2007	\$500.00	P2008
HUNTINGTON	CLAUDIA	9/4/2007	\$4,600.00	P2008

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JANOUSH	PAUL J.	9/30/2007	\$1,000.00	P2008
JANOUSH	PAUL J.	9/30/2007	\$2,300.00	P2008
JAY	JACOB LARSEN	9/11/2007	\$2,000.00	P2008
JAY	JACOB LARSEN	9/10/2007	\$1,000.00	P2008
JENSEN	BRIAN JAY	8/21/2007	\$1,100.00	P2008
JENSEN	BRIAN JAY	9/19/2007	\$1,700.00	P2008
LABBE	MICHAEL	9/26/2007	\$2,300.00	P2008
LABBE	MICHAEL	9/26/2007	\$2,300.00	P2008
LEVINSON	DAVID W.	9/30/2007	\$2,300.00	P2008
LEVINSON	DAVID W.	6/28/2007	\$2,300.00	P2008
LINK	WILLIAM	7/26/2007	\$50.00	P2008
LINK	WILLIAM	8/27/2007	\$50.00	P2008
LINK	WILLIAM	6/12/2007	\$50.00	P2008
LINK	WILLIAM	9/26/2007	\$50.00	P2008
LINK	WILLIAM	6/25/2007	\$2,250.00	P2008
LIVINGSTON	ROBERT	7/31/2007	\$1,000.00	P2008
LIVINGSTON	ROBERT	9/19/2007	\$2,300.00	P2008
MATTER	MITCHELL	9/10/2007	\$2,300.00	P2008
MATTER	MITCHELL	9/13/2007	\$2,300.00	P2008
MCGANN	ROBERT	9/18/2007	\$2,300.00	P2008
MCGANN	ROBERT	6/29/2007	\$500.00	P2008
MCPAHAN	DAVID	9/28/2007	\$4,600.00	P2008
MEFFE	DOM	9/13/2007	\$4,600.00	P2008

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MILLER	JANE KAY	8/29/2007	\$4,600.00	P2008
MILLER	RICARD V.	8/29/2007	\$4,600.00	P2008
PARKEY	JAMES MICHAEL	7/31/2007	\$2,500.00	P2008
POPE	LESLIE P.	9/28/2007	\$4,600.00	P2008
POTTER	FRED A	9/28/2007	\$4,600.00	P2008
RAVIOLA	FRANK	7/30/2007	\$500.00	P2008
RAVIOLA	FRANK	9/28/2007	\$2,300.00	P2008
RITCHIE	WILLIAM	7/27/2007	\$500.00	P2008
RITCHIE	WILLIAM	8/1/2007	\$250.00	P2008
RITCHIE	WILLIAM	8/30/2007	\$1,000.00	P2008
RITCHIE	WILLIAM	9/4/2007	\$500.00	P2008
RITCHIE	WILLIAM	9/25/2007	\$100.00	P2008
ROBINETTE JR.	KENNETH	9/28/2007	\$4,600.00	P2008
RUSSELL JR.	EDWARD EMERSON	9/13/2007	\$4,200.00	P2008
SAMPLES	GINGER	9/7/2007	\$2,300.00	P2008
SAMPLES	GINGER	6/15/2007	\$250.00	P2008
SHERMAN	PETER	9/7/2007	\$1,000.00	P2008
SHERMAN	PETER	9/13/2007	\$2,000.00	P2008
SPINELLI	EDGARDO	9/30/2007	\$4,600.00	P2008
STOKELY	MARVIN	8/20/2007	\$500.00	P2008
STOKELY	MARVIN	9/4/2007	\$300.00	P2008
STOKELY	MARVIN	9/8/2007	\$1,300.00	P2008

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STOKELY	MARVIN	6/13/2007	\$250.00	P2008
STOKELY	MARVIN	7/5/2007	\$250.00	P2008
STONE III	BENJAMIN JENNINGS	6/11/2007	\$2,300.00	P2008
STONE III	BENJAMIN JENNINGS	9/24/2007	\$2,300.00	P2008
STRICKLAND	LEONARD G.	9/18/2007	\$4,600.00	P2008
STRIPLING	DR. KAY W.	9/19/2007	\$500.00	P2008
STRIPLING	DR. KAY W.	9/29/2007	\$2,300.00	P2008
SUMMERS	JUANITA W.	9/28/2007	\$4,600.00	P2008
SUMMERS	ROBERT T.	9/28/2007	\$4,600.00	P2008
TOELKE	DUDLEY	6/7/2007	\$500.00	P2008
TOELKE	DUDLEY	9/12/2007	\$2,300.00	P2008
TUBBS	MICHAEL LEON	8/22/2007	\$500.00	P2008
TUBBS	MICHAEL LEON	9/17/2007	\$2,000.00	P2008
TUTCHER	DAN C.	7/23/2007	\$2,300.00	P2008
TUTCHER	DAN C.	9/28/2007	\$2,300.00	P2008
TUTCHER	KIM	9/28/2007	\$2,300.00	P2008
TUTCHER	KIM	9/28/2007	\$2,300.00	P2008
VANDERMEST	JULIE	8/14/2007	\$2,000.00	P2008
VANDERMEST	JULIE	8/31/2007	\$2,000.00	P2008
WALL	HUGH	9/17/2007	\$4,600.00	P2008
WALLACE	SALLY	6/11/2007	\$2,300.00	P2008
WALLACE	SALLY	9/30/2007	\$2,300.00	P2008

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WALSH	ANNE B.	8/29/2007	\$2,300.00	P2008
WALSH	ANNE B.	6/13/2007	\$2,300.00	P2008
WALSH	THOMAS M.	8/29/2007	\$2,300.00	P2008
WALSH	THOMAS M.	6/13/2007	\$2,300.00	P2008
WILKINS JR.	C. HOWARD	7/31/2007	\$2,000.00	P2008
WILKINS JR.	C. HOWARD	9/27/2007	\$1,000.00	P2008
YOUNG	WILLIAM F.	9/13/2007	\$500.00	P2008
YOUNG	WILLIAM F.	6/12/2007	\$2,300.00	P2008

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