



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

RQ-2

Dawn Perkerson, Treasurer
Volunteer PAC
P.O. Box 153552
Nashville, TN 37215

MAY 14 2003

Identification Number: C00341743

Reference: 30 Day Post-General Report (10/17/02-11/25/02)

Dear Ms. Perkerson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portions attached) discloses one or more contributions which appear to be from a corporation(s). 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation.

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

If you have received a prohibited contribution(s), 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. See 11 CFR 103.3(b)(1).

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Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on 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 a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

-Please clarify all expenditures made for "Media Buy" and "Newspaper" on Schedule(s) B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E, or F supporting Lines 23, 24, or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Please amend Schedule B supporting Line 21(b) by providing the office sought (House, Senate, or President), state and congressional district, if applicable, for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

-Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$94,800 in itemized receipts from individuals. The sum of the entries itemized on Schedule A, however, indicates the total to be \$99,800. Please amend your report to clarify the discrepancy.

-Commission Regulations require that a committee disclose 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, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

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

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requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

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 request 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 shall 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 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.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. 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 need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Julie Perry
Campaign Finance Analyst
Reports Analysis Division

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER: (check only one)		PAGE 25 / 45	
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16 <input type="checkbox"/> 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
Volunteer PAC

Full Name (Last, First, Middle Initial) A. Robert Strickland		Date of Receipt M M / D D / Y Y Y Y 10 / 16 / 2002	
Mailing Address 226 S. Stratford Road City State Zip Code Winston Salem NC 27104-		Amount of Each Receipt this Period 1000.00	
FEC ID number of contributing federal political committee.		Receipt	
Name of Employer Information Requested Receipt For: Primary General Other (specify)	Occupation information Requested Aggregate Year-to-Date 1000.00	Transaction ID: 112620028C224260	

Full Name (Last, First, Middle Initial) B. Monica Tateale		Date of Receipt M M / D D / Y Y Y Y 10 / 16 / 2002	
Mailing Address 4728 Lucille Drive City State Zip Code San Diego CA 92115-		Amount of Each Receipt this Period 1000.00	
FEC ID number of contributing federal political committee.		Receipt	
Name of Employer Health Policy Source Receipt For: Primary General Other (specify)	Occupation Government Relations Dir Aggregate Year-to-Date 1000.00	Transaction ID: 112620028C224361	

Full Name (Last, First, Middle Initial) C. The St. Joe Company		Date of Receipt M M / D D / Y Y Y Y 10 / 01 / 2002	
Mailing Address P.O. Box 1300 City State Zip Code Jacksonville FL 32201-		Amount of Each Receipt this Period 5000.00	
FEC ID number of contributing federal political committee.		Receipt	
Name of Employer Receipt For: Primary General Other (specify)	Occupation Aggregate Year-to-Date 5000.00	Transaction ID: 112620028C229562	

SUBTOTAL of Receipts This Page (optional)	7000.00
TOTAL This Period (last page this line number only)	

