

August 19, 2009

Ms. Laura Sinram  
Senior Campaign Finance Analyst  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Dear Ms. Sinram:

The National Republican Congressional Committee (FEC ID# C0075820) is in receipt of your Request for Additional Information dated July 15, 2009 regarding our 2009 February Monthly FEC report.

With respect to the receipts from the three limited liability companies: these entities are treated as partnerships under IRS rules, and thus these are permissible donations. We have now made two requests to each of the entities that they provide us information with respect to the individual members to whom the donations are to be attributed. Should any of the attributions to an individual exceed \$200 aggregate, we will amend our report to reflect the applicable individual attribution(s).

The Committee initially reported a refund of \$ 20,000 to Michael Bowen on 6/29/07, a check which was voided on 1/31/09. The replacement check to Mr. Bowen had been reissued on 1/27/09. All three transactions were reported properly.

The report reflects the Committee's correct beginning cash-on-hand at 1/1/09, as determined at the conclusion of the Committee's review of its financial records conducted during 2008, and in reported in accordance with guidance received in January 2009 from representatives of the Commission's Office of General Counsel and Reports Analysis Division.

All negative amounts on Schedule B for line 21b, as referenced in your letter, represent void checks. All offsets to operating expenditures that represent actual amounts deposited by the Committee are, as indicated in your letter, reported as receipts on Schedule A for line 15.

The line 15 receipts referenced in your letter from Goddard for Congress, Lyle Larson for Congress, Lynn Jenkins for Congress, and Ozinga for Congress result not from expenditures to these entities, but from payments made to Kevin McGrann. The receipts from Musgrave for Congress and Upton for All of Us result not from payments made to the entities, but from payments made to the Republican National Committee. Refunds from these campaign committees were at exact cost, and thus represented the usual and normal charge.

The Line 15 receipt from JCM Fair Fund QSF represents a rebate for retirement benefit payments originally made to Transamerica East.

Regarding the void checks totaling \$ 58,021.83 with respect to the following vendors:

Joseph M. Boland, III - the original payment for \$ 33.40 was disclosed on the February 2006 monthly report.

Burlington Northern Santa Fe - the original payment for \$ 1,134.80 was disclosed on the March 2005 monthly report; the original payment for \$ 567.40 was disclosed on the March 2005 monthly report; the original payment for \$ 2,542.50 was disclosed on the July 2005 monthly report in the invoice amounts of \$ 1,271.25 and \$ 1,271.25.

Erin E. Casey - the original payment for \$ 1,585.04 was disclosed on the August 2005 monthly report, in the invoice amounts of \$ 186.72, \$ 886.20, \$ 209.27, and \$302.85.

Sara A. Conahan - the original payment for \$ 171.10 was disclosed on the October 2006 monthly report.

Congressional Color Graphics - the original payment for \$ 63.00 was disclosed on the July 2005 monthly report, in the

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invoice amounts of \$ 30.00, \$ 30.00, \$ 1.50, and \$1.50.

Sam Dawson - the original payment for \$ 186.00 was disclosed on the 2006 30-day Post-General report.

Edonations.com - the original payment for \$ 1,164.80 was disclosed on the July 2007 monthly report.

Brett M. Furber - the original payment for \$ 15.00 was disclosed on the July 2005 monthly report.

Gard for Congress - the original payment for \$ 75.00 was disclosed on the July 2006 monthly report.

Timothy R. Garon - the original payment for \$ 3,396.79 was disclosed on the June 2006 monthly report, in the invoice amounts of \$ 254.60, \$ 1,441.55, \$ 666.73, \$133.40, \$ 139.84, \$ 476.00, \$ 235.20, and \$ 49.47.

Todd R. Johnson - the original payment for \$ 3,748.41 was disclosed on the October 2005 monthly report, in the invoice amounts of \$ 482.29, \$ 1,464.79, \$ 1,005.78, \$ 206.69, and \$ 588.86.

Henry Kurusz IV - the original payment for \$ 13.51 was disclosed on the September 2006 monthly report.

Letha Holverson - the original payment for \$ 20.00 was disclosed on the March 2007 monthly report.

Christopher A. Maloney - the original payment for \$ 17.33 was disclosed on the October 2005 monthly report.

Emily S. Palumbos - the original payment for \$ 2,265.19 was disclosed on the 2006 12-day Pre-General report, in the invoice amounts of \$ 438.90, \$ 991.76, \$ 788.03, and \$ 46.50.

Edwin C. Patru - the original payment for \$ 22.00 was disclosed on the 2006 12-day Pre-General report.

Jonathan B. Poe - the original payment for \$ 1,592.62 was disclosed on the 2006 12-day Pre-General report, in the invoice amounts of \$ 250.29, \$ 139.00, \$ 745.96, and \$457.37.

John R. Randall - the original payment for \$ 147.00 was disclosed on the August 2006 monthly report, in the invoice amounts of \$ 18.00, \$ 89.00, and \$ 40.00.

Michael A. Ricci - the original payment for \$ 281.67 was disclosed on the August 2006 monthly report, in the invoice amounts of \$ 44.11, \$ 10.00, \$ 26.00, and \$ 201.56.

lojana D. Safarik - the original payment for \$ 52.00 was disclosed on the August 2006 monthly report.

Peter R. Saling - the original payment for \$ 2,247.69 was disclosed on the October 2006 monthly report, in the invoice amounts of \$ 887.04, \$ 453.75, \$ 249.57, \$578.60, \$ 74.23, and \$ 4.50; the original payment for \$ 1,246.18 was disclosed on the 2006 12-day Pre-General report, in the invoice amounts of \$ 495.00, \$ 199.91, \$ 472.07, and \$ 79.20.

Schering-Plough Corporation - the original payment for \$ 1,968.50 was disclosed on the 2005 Year-End report, in the invoice amounts of \$ 894.20 and \$ 1,074.30.

Mackenzie J. Smith - the original payment for \$ 2,622.76 was disclosed on the October 2006 monthly report, in the invoice amounts of \$ 1,124.90, \$ 768.85, \$ 221.47, \$277.95, and \$ 229.59.

Tara M. Snow - the original payment for \$ 66.70 was disclosed on the February 2005 monthly report; the original payment for \$ 45.00 was disclosed on the March 2005 monthly report; the original payment for \$ 372.00 was disclosed on the April 2005 monthly report, in the invoice amounts of \$ 316.00 and \$ 56.00; the original payment for \$21.70 was disclosed on the October 2006 monthly report.

Lawrence R. Telford IV - the original payment for \$ 31.95 was disclosed on the March 2006 monthly report; the original payment for \$ 460.12 was disclosed on the October 2006 monthly report, in the invoice amounts of 319.56 and \$ 140.56.

The Congressional Institute - the original payment for \$ 471.50 was disclosed on the April 2006 monthly report.

The Trover Shop - the original payment for \$ 15.83 was disclosed on the December 2007 monthly report, in the invoice amounts of \$ 14.97 and \$ 0.86.

United Asset Coverage - the original payment for \$ 1,260.03 was disclosed on the February 2006 monthly report, in the invoice amounts of \$ 68.51 and \$ 1,191.52.

Verizon Cabs - the original payment for \$ 734.58 was disclosed on the October 2007 monthly report.

Don Herklotz - the original refund check for \$ 400 was disclosed on the September 2007 monthly report (on line 21b).

The Committee voided these check following a comprehensive review of its records conducted during 2008 (we have previously notified the Commission that this review was taking place). In each case, the checks were voided only after confirmation with the vendor/payee that all outstanding Committee obligations had been paid in full, and that these amounts were not owed.

Your letter references a contribution refund issued to American Recovery Service. We are amending this February 2009 monthly report to reflect the memo notation that this contribution was originally attributed to Eugene J. Cambridge

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(contribution date was 7/2/08). The contribution refund reported as Dulce Mitchell should have been reported as Dulce Michell (contribution date was 12/8/08), and we are amending this report accordingly. The contribution refund to Surfside Marine in the amount of \$ 25 reflects a refund to a contributor whose donation did not exceed \$ 200 in the yearly aggregate, and thus the original contribution was not (and was not required to be) itemized on any Schedule A. We itemized this contribution refund as a voluntary disclosure.

The Committee has reviewed all reimbursements to individuals for travel and subsistence and can as you requested confirm that no further itemization is required under any Commission regulations for these expenditures.

The payments referenced in your letter for Catering, Facility Rental, Fundraising Phone Calls, Postage, and Printing were operating and administrative payments solely benefiting and on behalf of the National Republican Congressional Committee. As such, they were not made on behalf of any specifically identified federal candidates, nor did they constitute public communications or voter drive activity containing express advocacy. Therefore, these disbursements are as you noted correctly reported on Schedule B for Line 21b, and do not require a Schedule B, Schedule E, or Schedule F for lines 23, 24 or 25.

Sincerely:

Keith A. Davis, Treasurer  
National Republican Congressional Committee

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