



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 9, 2013

PAUL BREAZEALE, TREASURER
MISSISSIPPI REPUBLICAN PARTY
P. O. BOX 60
JACKSON, MS 39205

Response Due Date
10/15/2013

IDENTIFICATION NUMBER: C00084368

REFERENCE: MAY MONTHLY REPORT (04/01/2013 - 04/30/2013)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 6 item(s):

1. Schedule A discloses an apparent contribution(s) from a corporation(s). Please be advised that 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation. Limited liability companies (LLC's) that choose to be treated as corporations under the Internal Revenue Service rules, or have shares that are traded publicly, are considered corporations. In the event that the LLC is treated as a partnership under IRS rules, the aforementioned contributions are to be attributed to each member in direct proportion to his or her share of the LLC's profit or by agreement of its members. Each member who has contributed in excess of \$200 for the calendar year should be identified by name, address, amount of contribution, name of employer, occupation and aggregate total on Schedule A. (11 CFR §110.1(g)(1) through (5))]

The Commission notes the transfer-out of the apparent prohibited contribution(s) disclosed on your 2013 June Monthly Report (5/1/13-5/31/13). Although the Commission may take further legal action concerning this matter, your prompt action in refunding the contribution(s) will be taken into consideration.

2. A review of the reports filed by your committee (see attached) indicates that your committee received one or more contributions from "S & B PAC" which has not been disclosed on their report(s) of receipts and disbursements. Please

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clarify if the contribution(s) was received from the disclosed donor's federal account and amend your report(s) if necessary.

3. Commission Regulations require the continuous reporting of all outstanding debts. This report omits debts itemized on your previous report(s). Please file an amendment to your report to disclose the current status of these omitted debts: \$3,639.72 to "First Bankcard". (11 CFR §§ 104.3(d) and 104.11)

4. Schedule H4 discloses 100% non-federal activity. Please be advised that by definition, this activity does not qualify as an expense(s) that can be allocated between your federal and non-federal accounts. If the disbursements were for operating expenditures paid for with 100% federal funds, they should be itemized on Schedule B for Line 21(b) of the Detailed Summary Page. If these expenses were permissibly paid for with 100% non-federal funds, they should not be disclosed on Schedule H4. Further, any reimbursement from your committee's non-federal account for any portion of this activity is not permissible and must be returned. (11 CFR §102.5(a)(1)(i)) Please amend your report to clarify this discrepancy.

5. On Schedule H4, your allocated activity or event year-to-date total calculations for the Administrative category and "STATE/ADMIN" event are incorrect. Allocated activity or event year-to-date totals for administrative, voter drive, exempt activity costs and expenses for public communications made by PACs referencing only political parties are derived by aggregating all disbursements during the calendar year for each separate category. Allocated activity or event year-to-date totals for fundraising and direct candidate support activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous event year-to-date total for that category or event. This running event year-to-date total should be disclosed after each disbursement is listed. Please amend your report by providing the correct event year-to-date totals. (11 CFR §§104.10(b)(2) and 104.17(b)(1)(ii))

6. Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 to clarify the following description(s): "URF Dinner Expenses." (11 CFR §§104.3(b)(3) and 104.10(a)(4))

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at: http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list

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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) 694-1157.

Sincerely,

A handwritten signature in black ink that reads "Laura E. Sinram". The signature is written in a cursive, flowing style.

Laura Sinram
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

**Excessive, Prohibited, and Impermissible Contributions
Mississippi Republican Party (C00084368)**

Contribution Received Not Disclosed by Donor Committee

Contributor Name	Date	Amount	Report
S & B PAC	4/3/13	\$300.00	2013 May Monthly