



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

February 26, 2015

KEITH A. DAVIS, TREASURER  
NATIONAL REPUBLICAN SENATORIAL  
COMMITTEE  
425 SECOND STREET NE .  
WASHINGTON, DC 20002

**Response Due Date**  
**04/02/2015**

IDENTIFICATION NUMBER: C00027466

REFERENCE: AMENDED SEPTEMBER MONTHLY REPORT (08/01/2014 - 08/31/2014),  
RECEIVED 09/29/2014

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 5 item(s):

1. Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. Please be advised that 52 U.S.C. §30116(f) (formerly 2 U.S.C. §441a(f)) and 11 CFR §110.1(c) prohibit a political committee which is established and maintained by a national political party, and any affiliated committees, from accepting contributions from a person or non-multicandidate political committee in excess of \$32,400 in a calendar year.

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

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

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If the foregoing conditions for reattributions were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of your check for the refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any refunds should be disclosed on Schedule B supporting 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution or refund the excessive amount will be taken into consideration.

**2.** A review of the reports filed by your committee indicates that your committee received one or more contributions from "International Warehouse Logistics Association" which has not been disclosed on their report(s) of receipts and disbursements. Please clarify if the contribution(s) was received from the disclosed donor's federal account and amend your report(s) if necessary.

**3.** Schedule C-1 of your report discloses that the loan from "CHAINBRIDGE BANK NA" is a line of credit. Loans and lines of credit received from lending institutions must be originally reported on both Schedules C and C-1. The Committee must continuously report the status of the loan on Schedule C, and should file a new Schedule C-1 if the loan or line of credit is restructured or if a draw on the line of credit is made. For lines of credit, the original amount on Schedule C will change when additional amounts are drawn from the total credit set aside for the Committee by the lending institution to reflect the total amount of obligation which the Committee is currently required to pay.

In addition, when a loan is received or when a draw is made on a line of credit, the Committee must report this receipt on a Schedule A supporting Line 13 of the Detailed Summary Page to enter the amount into the Committee's receipts. Likewise, when a payment is made, the payments on the principal must be disclosed on Schedule B supporting Line 26. Any payments on interest should be reported separately on the appropriate disbursement schedule. (11 CFR §104.3(d))

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Please file an amendment to your report that includes the the receipt of the loan on Schedule A supporting Line 13 and the status of the loan on Schedule C.

4. The limitations on making coordinated party expenditures on behalf of a Senate candidate in the States of Iowa, North Carolina and Arkansas for the 2014 general election are \$223,600.00, \$714,600.00 and \$212,600.00, respectively. Your reports, however, disclose coordinated party expenditures made on behalf of "JODI KAY ERNST" totaling \$350,520.00, "THOMAS ROLAND THILLIS" totaling \$932,572.34, and "THOMAS BRYANT COTTON" totaling \$216,788.29, which appear to exceed the limitations under 52 U.S.C. §30116(d) (formerly 2 U.S.C. §441a(d)) (see attached).

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

If you have made an excessive coordinated party expenditure, you must notify the candidate and request a refund of the amount in excess of the limitation.

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund request sent to the candidate. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

Although the Commission may take further legal action concerning the excessive coordinated party expenditures, prompt action in obtaining a refund will be taken into consideration. (11 CFR §103.3(b)(1) and (3))

5. Your report discloses activity outside the coverage dates. This report should include only activity that occurred from 8/1/14 to 8/31/14 (See Attached). Please amend this report and any previous reports so that all activity is disclosed in the report covering the period in which the activity occurred. (52 U.S.C. §30104(b) (formerly 2 U.S.C. § 434(b)))

**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**

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**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) 694-1143.

Sincerely,

A handwritten signature in black ink that reads "Kaitlin E. Seufert". The signature is written in a cursive style with a large initial 'K'.

Kaitlin Seufert  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division

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**Excessive, Prohibited, and Impermissible Contributions  
National Republican Senatorial Committee (C00027466)**

**Excessive Contributions from Individuals**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Report</b>
MR. DAVID H. WALSH	7/21/14	\$32,400.00	2014 August Monthly
MR. DAVID H. WALSH	8/23/14	\$500.00	2014 September Monthly
MRS. JADE WALSH	7/21/14	\$32,400.00	2014 August Monthly
MRS. JADE WALSH	8/23/14	\$500.00	2014 September Monthly

**Excessive, Prohibited, and Impermissible Contributions  
National Republican Senatorial Committee (C00027466)**

**Excessive Coordinated Expenditures**

<b>Candidate</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>	<b>Report</b>
JODI KAY ERNST	8/21/14	\$350,520.00	G2014	2014 September Monthly
THOMAS ROLAND TILLIS	8/27/14	\$602,188.50	G2014	2014 September Monthly
THOMAS ROLAND TILLIS	8/27/14	\$330,383.74	G2014	2014 September Monthly
THOMAS BRYANT COTTON	4/17/14	\$2,500.00	G2014	2014 May Monthly
THOMAS BRYANT COTTON	8/29/14	\$214,288.29	G2014	2014 September Monthly

**SCHEDULE E (FEC Form 3X)  
ITEMIZED INDEPENDENT EXPENDITURES**

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FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) <b>NRSC</b>	<b>FEC IDENTIFICATION NUMBER</b> C00027466
Check if <input type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report <input type="checkbox"/> New report <input type="checkbox"/> Amends report filed on	

Full Name of Payee <b>NATIONAL MEDIA RESEARCH, PLANNING, &amp; PLACEMENT</b>	Date of Public Distribution/Dissemination 08 / 12 / 2014
Mailing Address    815 SLATERS LANE	Amount 22922.00 Transaction ID : SE24.938385
City                                  State                                  Zip Code ALEXANDRIA                                  VA                                  22314	
Purpose of Expenditure MEDIA PRODUCTION	Category/Type
Name of Federal Candidate MARK EMERY UDALL	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose    Office Sought: <input type="checkbox"/> House    District: 00 <input type="checkbox"/> President <input checked="" type="checkbox"/> Senate    State: CO
Calendar Year-To-Date Per Election for Office Sought 86282.00	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)

Full Name of Payee <b>NATIONAL MEDIA RESEARCH, PLANNING, &amp; PLACEMENT</b>	Date of Public Distribution/Dissemination 08 / 12 / 2014
Mailing Address    815 SLATERS LANE	Amount 530620.80 Transaction ID : SE24.938386
City                                  State                                  Zip Code ALEXANDRIA                                  VA                                  22314	
Purpose of Expenditure MEDIA	Category/Type
Name of Federal Candidate MARY MICHELLE NUNN	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose    Office Sought: <input type="checkbox"/> House    District: 00 <input type="checkbox"/> President <input checked="" type="checkbox"/> Senate    State: GA
Calendar Year-To-Date Per Election for Office Sought 2037265.69	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)

(a) <b>SUBTOTAL</b> of Itemized Independent Expenditures...	553542.80
(b) <b>SUBTOTAL</b> of Unitemized Independent Expenditures ...	
(c) <b>TOTAL</b> Independent Expenditures...	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

JAY C BANNING

Signature

Date    08 / 14 / 2014

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**SCHEDULE F (FEC Form 3X)**  
**ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY**  
**POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)**  
**ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE**  
**(2 U.S.C. §441a(d))**

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 FOR LINE 25 OF FORM 3X

(To be used only by Political Committees in the General Election)

NAME OF COMMITTEE (In Full) <b>NRSC</b>	
Has your committee been designated to make coordinated expenditures by a political party committee? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If YES, name the designating committee: <b>REPUBLICAN NATIONAL COMMITTEE</b>	Full Name of Subordinate Committee <b>NRSC</b> Mailing Address <b>425 2ND ST., NE</b> City <b>WASHINGTON</b> State <b>DC</b> ZIP Code <b>20002</b>
Full Name (Last, First, Middle Initial) of Each Payee <b>ON MESSAGE, INC.</b> Mailing Address <b>817 SLATERS LN.</b> City <b>ALEXANDRIA</b> State <b>VA</b> Zip Code <b>22314</b> Name of Federal Candidate Supported <b>CORY SCOTT GARDNER</b> Office Sought: <input checked="" type="checkbox"/> House <input checked="" type="checkbox"/> Senate <input type="checkbox"/> Presidential State: <b>CO</b> District: <b>00</b>	Purpose of Expenditure <b>MEDIA PLACEMENT/PRODUCTIO</b> N Category/Type Date <b>08 / 27 / 2017</b> Amount <b>379013.60</b> Aggregate General Election Expenditure for this Candidate ▶ <b>379013.60</b> Transaction ID : <b>SF25-1111099</b>
Full Name (Last, First, Middle Initial) of Each Payee <b>TARGET ENTERPRISES</b> Mailing Address <b>15260 VENTURA BLVD. SUITE 1240</b> City <b>SHERMAN OAKS</b> State <b>CA</b> Zip Code <b>91403</b> Name of Federal Candidate Supported <b>JONI KAY ERNST</b> Office Sought: <input checked="" type="checkbox"/> House <input checked="" type="checkbox"/> Senate <input type="checkbox"/> Presidential State: <b>IA</b> District: <b>00</b>	Purpose of Expenditure <b>MEDIA PLACEMENT/PRODUCTIO</b> N Category/Type Date <b>08 / 21 / 2014</b> Amount <b>350520.00</b> Aggregate General Election Expenditure for this Candidate ▶ <b>350520.00</b> Transaction ID : <b>SF25-1111100</b>
Full Name (Last, First, Middle Initial) of Each Payee <b>SRCP MEDIA, INC</b> Mailing Address <b>201 N UNION ST. SUITE 200</b> City <b>ALEXANDRIA</b> State <b>VA</b> Zip Code <b>22314</b> Name of Federal Candidate Supported <b>WILLIAM CASSIDY</b> Office Sought: <input checked="" type="checkbox"/> House <input checked="" type="checkbox"/> Senate <input type="checkbox"/> Presidential State: <b>LA</b> District: <b>00</b>	Purpose of Expenditure <b>MEDIA PLACEMENT/PRODUCTIO</b> N Category/Type Date <b>08 / 27 / 2014</b> Amount <b>295500.00</b> Aggregate General Election Expenditure for this Candidate ▶ <b>295500.00</b> Transaction ID : <b>SF25-1111101</b>
<b>SUBTOTAL</b> of Expenditures This Page (optional).....▶	<b>1025033.60</b>
<b>TOTAL</b> This Period (last page this line number only).....▶	

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