



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 14, 2015

ROBERT H. FRANK, TREASURER
NATIONAL DRAFT BEN CARSON FOR
PRESIDENT COMMITTEE
370 MAPLE AVENUE W SUITE 4
VIENNA, VA 22180-5615

Response Due Date
05/19/2015

IDENTIFICATION NUMBER: C00548420

REFERENCE: AMENDED 12 DAY PRE-GENERAL REPORT (10/01/2014 -
10/15/2014), RECEIVED 02/23/2015

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 3 item(s):

1. Your amended report discloses an increase in incurred debts owed to one or more vendors totals \$23,478.32 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR §104.3)

The Commission notes the memo text attached to your report stating, "The Pre-General Election report has been amended to correct and clarify the following items: (1) the outstanding debts increased by a total of \$23,518.32. This was caused by inadvertently excluding debt due to International Data Management, Inc. of \$40.00 and inadvertently excluding a debt due to Sisk Fulfillment Services of \$23,478.32." Although the Commission may take further legal action concerning this matter, your clarification and any additional clarification you may have will be taken into consideration. 11 CFR §104.3

2. Commission Regulations require that a committee discloses 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 (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not

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complete.

The attached employer name and occupation entries appear on your report and are not considered acceptable.

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 requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

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 requests 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 should 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 amend your report to 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.

3. Schedule E discloses independent expenditures paid during a period outside

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the coverage dates of this report. Please be advised that independent expenditures should be disclosed on the report covering the date of payment and not the date of dissemination. Please amend your report, and any previous reports, to properly disclose independent expenditures on the report covering the period in which the payment occurred. (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 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) 694-1169.

Sincerely,



Kevin Fortkiewicz
Senior Campaign Finance Analyst
Reports Analysis Division

Inadequate Employer/Occupation Entries
National Draft Ben Carson for President Committee (C00548420)

Employer	Occupation
Information Requested	Information Requested
Information Requested	Investor
Owner	Rental Propert
Self	Information Requested
Self	Sales
Self	Self
self	Self Employed
Self Employed	Self Employed
SMRS	Registered Nurs
Self	Manager
Self	Service
Self-employed	Business
Self-Employed	Manager