



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

June 12, 2009

Randall Pullen, Treasurer (Attn: Jay Banning)  
Republican National Committee  
310 First Street, SE  
Washington, DC 20003  
Identification Number: C00003418

Response Due Date:  
July 20, 2009

Reference: Amended April Monthly Report (3/1/09-3/31/09), received 5/22/09

Dear Treasurer:

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

1. 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 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

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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.

2. The identification of each contributor, including an adequate occupation and name of employer for each, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry inadequately identified (see attached).

The Commission also notes several apparent joint contributions on your report. Please be advised that for the purposes of itemization, joint contributions should be reported as though the joint contributors had given separately (see attached). If these contributions do not meet the definition of a joint contribution please amend your report to correctly itemize each contributor.

3. Schedule A of your report discloses a transfer from "Chambliss Victory Committee," which is a joint fundraising committee(s) affiliated with your committee. In addition, Schedule A of your report discloses contributions from "Aflac Inc. PAC," "American Bankers Association Bank PAC," "American Dental PAC," "American Nurses Association PAC," "Independent Insurance Agents & Brokers," "Lockheed Martin Employees PAC," "Mortgage Bankers Association PAC," "N.R.A.- Political Victory Fund" and "Realtors PAC," which indicate "2008 PAC contribution from 3/12/2009 transfer Chamblis Victory Cmte." If these contributions represent your committee's share of the gross contributions received

through the joint fundraiser, each should be reported as a memo Schedule A. Please clarify the nature of these receipts and amend your report if necessary.

**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) 694-1177.

Sincerely,



Corbin T. Jones  
Senior Campaign Finance Analyst  
Reports Analysis Division

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REPUBLICAN NATIONAL COMMITTEE

Employer	Occupation	Employer	Occupation
A.W.G.	Associate	None	Artist
B.C.S.I.	C.E.O. Printer	None	Attorney
Bds/Caci	Consultant	None	Consultant
C.A.I.	Physician	None	None
C.C.F.	Vice Chairperson	None	Self Employed
C.I.S.	Insurance Broker	P.C.A.O.B.	Attorney
Department of Transportation	Federal Employee	Prt	Marketing
E. P. C. O.	Oil & Gas	S.M.I.	Business
Ecc	Project Manager	S.P.C.	Engineer
Edg	Prof. Engineer	Self	Executive
Epc	Svp	Self	Owner Escrow Company
G.I.C.	President	Self	Water Utility
H.S.B.C.	Tax Preparer	Self - Employed	President
I. R. S.	Federal Employee	Self Employed	Small Business Owner
I.I.C.A.	Administration	Self-Employed	Self-Employed
M.F.C.	Accountant	Sfa	Director
Marina Dentistry	R.D.H.	Tdic	Ceo
N. T. L.	General Contractor	The Heart Group	Pa
N/A	N/A	Tpmg	Physician
Na	Na	Ts&L	Ceo
Ngia	Nautical Analyst	U.S. Government	Public Affairs

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not include that amount in the total for Line 1 la(i) on the Detailed Summary Page.

- Once the item is sold, report the sale price as a contribution from the purchaser on Line 1 la(i) if the purchaser is known. Report the sale price as an "other receipt" on Line 17 if the purchaser is unknown (e.g. if the stock is sold through an established market mechanism where the purchaser's name is not known by the committee). Itemize the transaction on Schedule A. If the purchase price exceeds \$200, report the name of employer and occupation if the purchaser is known. 104.13(b). Any expenses incurred from the liquidation of appreciated goods must be reported as operating expenditures. See AO 1989-6.

**JOINT CONTRIBUTIONS**

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

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

FOR LINE NUMBER: (check only one)  
 11a    11b    11c    12    13    14    15    16    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)  
**Freedom Party State Committee**

**A. Cochran, Dan**  
 Full Name (Last, First, Middle Initial)  
 Mailing Address: 1472 Lolceta Street  
 City: City State: ST Zip Code: 00000  
 Date of Receipt: 06 23 2008  
 Amount of Each Receipt this Period: 500.00  
 Name of Employer: Grimbridge and Associates Occupation: General Manager  
 FEC ID number of contributing federal political committee: C  
 Receipt For:  Primary  General  Other (specify)  
 Aggregate Year-to-Date: 500.00

**B. Cochran, Linda**  
 Full Name (Last, First, Middle Initial)  
 Mailing Address: 1472 Lolceta Street  
 City: City State: ST Zip Code: 00000  
 Date of Receipt: 06 23 2008  
 Amount of Each Receipt this Period: 500.00  
 Name of Employer: Starker High School Occupation: Teacher  
 FEC ID number of contributing federal political committee: C  
 Receipt For:  Primary  General  Other (specify)  
 Aggregate Year-to-Date: 500.00

### Joint Contributions

A joint contribution is made by a single check (or other written instrument) that bears two signatures. A check with one signature may also be a joint contribution if an accompanying form or letter, signed by both contributors, instructs the committee to treat it as a joint contribution. (A check drawn on a joint bank account but signed by only one person does not qualify as a joint contribution absent an accompanying form or letter signed by the second person. Attribute the full amount of such a check only to the person who signed it. Alternatively, the committee may reattribute the contribution using the procedures described below.)

For the purposes of itemization, report a joint contribution as though the joint contributors had given separately.

A joint contribution is itemized in the illustration (entries A and B). The committee received a \$1,000 check from Mr. and Mrs. Cochran, signed by both. Because there were no instructions as to how to attribute the check, the committee must divide it equally between the two spouses—\$500 from each. 110.1(k)(2).

### Reattributions

This section describes how to report contributions for which the committee has requested reattributions from contributors. (See page 21.)

#### Receipt of Original Contribution

When itemizing a contribution that must be reattributed to correct an excessive amount, include a statement on Schedule A noting that a reattribution has been requested. 103.3(b)(5).

#### Receipt of Reattribution

In the report covering the period during which the reattribution is received, itemize as memo entries:

- Information on the contribution as it was previously disclosed; and
- Information on the contribution as it was reattributed, including the date the reattribution was received. 104.8(d)(3).

(Memo entries are explained on page 72.)

#### Refund of Excessive Portion

If the committee does not receive the reattribution instruction from the contributors, the committee must refund the excessive portion within 60 days of the treasurer's receipt of the contribution. 110.1(k). Disclose the refund on the next report. 103.3(b)

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