



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 23, 2019

JAMES R. ORCUTT, TREASURER
PHILLIPS 66 PAC
601 PENNSYLVANIA AVENUE, NW, STE. 1150N
WASHINGTON, DC 20004

Response Due Date
06/27/2019

IDENTIFICATION NUMBER: C00513549

REFERENCE: AMENDED YEAR-END REPORT (11/27/2018 - 12/31/2018), RECEIVED
02/26/2019

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 enforcement action.** Additional information is needed for the following 2 item(s):

1. Your amended report discloses an increase in receipts totaling \$13,402.02 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, "Amendment to 2018 Yr End adjusting coverage dates and cash on hand." 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 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

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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.

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.**

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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. For additional information about the report review process or specific filing information for your committee type, please visit <http://transition.fec.gov/rad/>. 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,

A handwritten signature in black ink, appearing to read "Brian Jones". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Brian Jones
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

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**Inadequate Employer/Occupation Entries
Phillips 66 PAC (C00513549)**

Employer	Occupation
Phillips 66 Company	ALY DOT A
Phillips 66 Company	ALY FCLTS B
Phillips 66 Company	ALY TRNG A
Phillips 66 Company	ALY TRNG B
Phillips 66 Company	AST HSE B
Phillips 66 Company	AVR ACCT D
Phillips 66 Company	AVR CMML A
Phillips 66 Company	AVR CMML D
Phillips 66 Company	AVR CMML LOGISTICS B
Phillips 66 Company	AVR COMMS C
Phillips 66 Company	AVR COMMS E
Phillips 66 Company	AVR ERP PROJECT A
Phillips 66 Company	AVR HSE ENV A
Phillips 66 Company	AVR HSE ENV B
Phillips 66 Company	AVR HSE ENV C
Phillips 66 Company	AVR HSE ENV D
Phillips 66 Company	AVR HSE ENV E
Phillips 66 Company	AVR VCO A
Phillips 66 Company	BP COMMS C
Phillips 66 Company	BP COMMS F
Phillips 66 Company	BP HR A
Phillips 66 Company	CHM B
Phillips 66 Company	ISP C
Phillips 66 Company	ISP D
Phillips 66 Company	PL1 EVP CMLS
Phillips 66 Company	PL1 EVP MIDSTREAM
Phillips 66 Company	PL1 VP HSE & PROJ
Phillips 66 Company	PL3 CMML
Phillips 66 Company	PL4 CMML CRUDE
Phillips 66 Company	PL4 DWST
Phillips 66 Company	PL4 MARINE
Phillips 66 Company	PL4 MASTER LIMITED PARTNERSHIP
Phillips 66 Company	PL4 OPS
Phillips 66 Company	PL5 ENV SR
Phillips 66 Company	PL5 REF
Phillips 66 Company	PL5 REF BSNS IMPR. SR
Phillips 66 Company	PL5 REF SR
Phillips 66 Company	PL6 BP F&A ORG SR
Phillips 66 Company	PL6 BP HSE MIDSTREAM

Inadequate Employer/Occupation Entries
Phillips 66 PAC (C00513549)

Employer	Occupation
Phillips 66 Company	PL6 GLOBAL OPTM
Phillips 66 Company	PL6 HRBP
Phillips 66 Company	PL6 HRBP SR
Phillips 66 Company	PL6 HSE REF
Phillips 66 Company	PL6 MARINE
Phillips 66 Company	PL6 NGL ASSET OPTM
Phillips 66 Company	PL6 NGL BD
Phillips 66 Company	PL6 PLANT
Phillips 66 Company	PL6 PRJTS SR
Phillips 66 Company	PL6 REF BSNS SVCS
Phillips 66 Company	PL6 REF OPS
Phillips 66 Company	PL6 REF OPS SR
Phillips 66 Company	PL6 REGION
Phillips 66 Company	PL6 SVCS
Phillips 66 Company	PL7 BP F&A AV
Phillips 66 Company	PL7 BP F&A ORG MIDSTREAM AV
Phillips 66 Company	PL7 CMML SCHEDULE
Phillips 66 Company	PL7 CNTRL CENTER AV
Phillips 66 Company	PL7 HRBP AV
Phillips 66 Company	PL7 HRBP SR
Phillips 66 Company	PL7 HSE ENV REF SR
Phillips 66 Company	PL7 HSE ER REF
Phillips 66 Company	PL7 HSE REF SR
Phillips 66 Company	PL7 PMO SR
Phillips 66 Company	PL7 PRJTS AV
Phillips 66 Company	PL7 PRJTS REF SR
Phillips 66 Company	PL7 PRJTS SR
Phillips 66 Company	PL7 REF BSNS IMPR. SR
Phillips 66 Company	PL7 REF BSNS SVCS
Phillips 66 Company	PL7 REF OPS BTL AV
Phillips 66 Company	PL7 REF OPS WEEKEND & NIGHT
Phillips 66 Company	PL7 REF QUALITY
Phillips 66 Company	PL7 REGION OPS AV
Phillips 66 Company	PL8 BP F&A SR
Phillips 66 Company	PL8 CONSOLE
Phillips 66 Company	PL8 OPS
Phillips 66 Company	PL8 REF OPS DAYTIME SR
Phillips 66 Company	PL8 REF OPS FLS
Phillips 66 Company	PL8 REF OPS FLS SR

**Inadequate Employer/Occupation Entries
Phillips 66 PAC (C00513549)**

Employer	Occupation
Phillips 66 Company	PL8 TRNG
Phillips 66 Company	PLN A
Phillips 66 Company	PLN B
Phillips 66 Company	SHD CRUDE/PRDCT B
Phillips 66 Company	SPC TURNAROUND C
Phillips 66 Company	SPC TURNAROUND D
Phillips 66 Company	TRD CRUDE D
Phillips 66 Company	TRD PRODUCT B