



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

June 10, 2014

VERNON L. ROBINSON III , TREASURER
NATIONAL DRAFT BEN CARSON FOR
PRESIDENT COMMITTEE
11-C TALCOTT FOREST ROAD
FARMINGTON, CT 06032

Response Due Date
07/15/2014

IDENTIFICATION NUMBER: C00548420

REFERENCE: APRIL QUARTERLY REPORT (01/01/2014 - 03/31/2014)

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 4 item(s):

1. The beginning cash balance of this report does not equal the ending balance of your Amended Year-End (10/1/13- 12/31/13) Report, received 5/8/14. Please correct this discrepancy and amend all subsequent report(s) that may be affected by the correction. (2 U.S.C. § 434)(b)(1))
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 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.

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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. On Schedule B supporting Line 21(b), you have itemized disbursements for which you have failed to include the complete address. Please amend your report to include the missing information. (11 CFR § 104.3(b)(3))

4. Schedule B discloses reimbursements to individuals for "Vernon Robinson III." When the reimbursement amount to individuals for travel and subsistence advances exceeds \$500, the payments by individuals to any one vendor that make up the reimbursement may have to be itemized. For example, if the related payments to any one vendor aggregate in excess of \$200 for the calendar year, the individual advance payment to the vendor must also be itemized in a memo entry for that reimbursement. Each memo entry must

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include the complete name and address of the original vendor, as well as the date, amount and detailed purpose of the advance. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must indicate so in an amendment to this report. Please amend your report to include the missing or clarifying information. See Advisory Opinion 1996-20 for additional clarification. (11 CFR § 104.9)

- Schedule B of your report discloses an expenditure(s) for "Advertising: radio ads" and "Advertising: IA Billboards." For your information and consideration when preparing future filings, if a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) containing express advocacy as defined under 11 CFR §100.22, this would constitute an independent expenditure and would be disclosed on a Schedule E supporting Line 24. Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate would be reported on Schedule B for Line 21(b) of the Detailed Summary Page.

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.

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Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Fortkiewicz". The signature is written in a cursive, flowing style.

Kevin Fortkiewicz
Campaign Finance Analyst
Reports Analysis Division

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

Employer	Occupation
CMC	Executive
ICA	CEO
ICM	Chair
IHSS	Provider
N/A	N/A
Owner	Ins Agency
PLICO	Med Doctor
ROSM	Physician
Self	Business Owner
Self	Restaurant Ownr
Self	Sales
Self	SemiRetHealthCa
Self	Small Business
Self-Employed	Self-Employed
Self-Employed	Business Owner
Self Employed	Self
Self Employed	Sales
Self Employed Business	Self Employed