

SUMMIT PAC



PO Box 15858 • Washington, DC 20003

March 30, 2007

Christopher J. Morse
Federal Election Commission
Senior Campaign Finance Analyst
Reports Analysis Division
999 E Street, NW,
Washington, DC 20463

Dear Mr. Morse:

This correspondence pertains to the Commission's inquiry dated November 22, 2006 regarding Summit PAC's October Quarterly Report covering the period of 7/1/06 thru 9/30/06. As the Commission's correspondence references, Schedule B of that report disclosed three contributions which appeared to exceed the limits set forth in the Act.

On April 26, 2005, Summit PAC issued three contributions to Federal candidates in the amount of \$1,000 dollars each and mistakenly attributed the contributions to the candidate's General elections, opposed to the Primary elections the candidates faced at that time. On September 14, 2006, Summit PAC issued three contributions to those same Federal candidates in the amount of \$5,000 dollars each, attributing the contributions to the candidate's General election efforts.

On December 16, 2006, Summit PAC responded to the Commission's inquiry and indicated that requests for refunds in the amount of \$1,000 each had been issued to the campaign committees in question and that those refunds would likely be reflected in the January 31, 2007 Year End filing.

On March 15, 2007 two of those refunds in the amount of \$1,000 each were deposited into Summit PAC's account. Those receipts will appear in Summit PAC's Quarterly report covering period 1/1/07 thru 3/31/07 due April 15, 2007.

The third refund request to the Chet Edwards for Congress Committee was retracted by Summit PAC because the candidate committee never deposited the \$5,000 contribution dated September 14, 2006. Upon that realization, it became apparent that contributions made to that candidate did not exceed the limits set forth in the Act. The \$5,000 that remains in Summit PAC's account because that check was never cashed also will appear in Summit PAC's Quarterly report covering period 1/1/07 thru 3/31/07 due April 15, 2007.

I am hopeful that the itemization of the information included in this follow-up response provides the Commission a fuller understanding of how these matters have been corrected and resolved and satisfies the Commission's review of these transactions.

Please don't hesitate to contact Summit PAC at (202) 486-6873, should you have any additional questions or concerns.

Most Sincerely,

John D. Hardesty
Treasurer

27039412680



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 22, 2006

John Douglas Hardesty Jr., Treasurer
Summit PAC
P.O. Box 15858
Washington, DC 20003

Response Due Date:
December 23, 2006

Identification Number: C00382333

Reference: October Quarterly Report (7/01/06-9/30/06)

Dear Mr. Hardesty:

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. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

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

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed

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on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Your 2006 October Quarterly Report (7/01/06-9/30/06) discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule(s) B supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

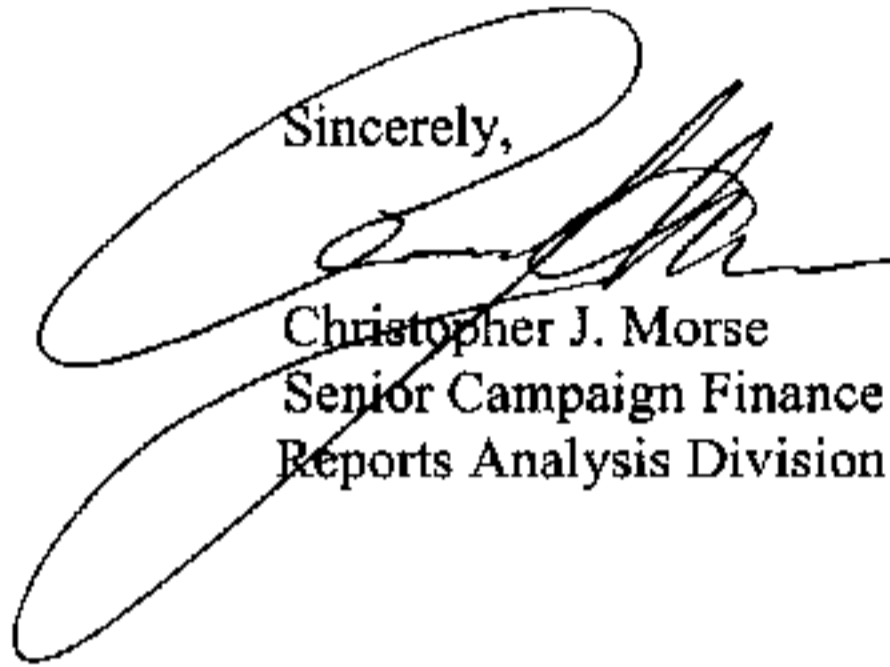
Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two-year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If volunteers have provided these services, please confirm this in writing.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. 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.

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) 694-1133.

Sincerely,



Christopher J. Morse
Senior Campaign Finance Analyst
Reports Analysis Division

298

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Recipient Name	Date	Amount	Election	Report
Chet Edwards for Congress	4/26/05	\$1,000	General	2005 July Quarterly
Chet Edwards for Congress	9/14/06	\$5,000	General	2006 October Quarterly

Recipient Name	Date	Amount	Election	Report
Boswell for Congress	4/26/05	\$1,000	General	2005 July Quarterly
Boswell for Congress	9/14/06	\$5,000	General	2006 October Quarterly

Recipient Name	Date	Amount	Election	Report
Charlie Melancon Campaign Committee Inc	4/26/05	\$1,000	General	2005 July Quarterly
Charlie Melancon Campaign Committee Inc	9/14/06	\$5,000	General	2006 October Quarterly

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5203

72-2240739
0441139

BOSWELL FOR CONGRESS
CARL MCGUIRE, TREAS.

224 S. STATE ST.
LAMONI, IA 50140



DATE 01-30-07

\$ 1,000.00

PAY TO THE ORDER OF Summit PAC
One Thousand dollars and 00/100 DOLLARS



ASB American State Bank
Total - Bank Service Fee

(611) 243-2715 - General Inquiries
(800) 284-2728 - Lamoni, IA 50140

MEMO over map

Carl McGuire

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CHARLIE MELANCON CAMPAIGN COMMITTEE, INC.

P. O. BOX 549
511 CONGRESS STREET
NAPOLEONVILLE, LA 70390
1-866-450-2288

CAPITAL ONE BANK
P.O. BOX 400
NAPOLEONVILLE, LA 70390

2318
14-9/650
3/19/2007

PAY TO THE ORDER OF Summit PAC

\$ **1,000.00

One Thousand and 00/100*****

DOLLARS

Summit PAC
POB 15858
Washington, DC 20003



AUTHORIZED SIGNATURE

MEMO

 **SECURITY FEATURES INCLUDED. DETAILS ON BACK** 

CHARLIE MELANCON CAMPAIGN COMMITTEE, INC.

Summit PAC
Contribution Refund

3/19/2007
2318
1,000.00

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Check Returned Uncashed

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SUMMIT PAC - FEDERAL ACCOUNT

P.O. BOX 15858
WASHINGTON, DC 20003-0858

244

15-7011911

2540

15122003

Date 9-14-06

Pay to the order of Chet Edwards for Congress \$ 5,000

FIVE THOUSAND DOLLARS Dollars 

Citibank

CITIBANK, F.S.B.
P.O. BOX 15858
WASHINGTON, DC 20003-0858

Memo COO-2-140-465 CIX-173

Budget of America 

Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
 The FEC added this page to the end of this filing to indicate how it was received.

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<input type="checkbox"/> No Postmark	
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Next Business Day Delivery <input type="checkbox"/>	
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<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked

[Signature]
PREPARER
 (3/2005)

4/3/07
DATE PREPARED

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