



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

RQ-2

Tom H. Jackson, Treasurer  
Victory 2002  
223 Eighth Avenue North, Suite 200  
Nashville, TN 37203

DEC 11 2002

Identification Number: C00375444

Reference: October Quarterly Report (7/1/02-9/30/02)

Dear Mr. Jackson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

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

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

VICTORY 2002  
PAGE 2

Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-On Schedule H3 supporting Line 18 of the Detailed Summary Page, Lines i), ii)e), and iii)c) for the transfer-in from the Victory 2002-Non Federal do not add up to the 7/1, 7/9, 7/18, 7/27, 8/4, 8/13, 8/15, 8/24, 9/3, 9/10, 9/16, 9/18, and 9/25 transfers totaling \$309,465.48. Please amend your report to correct this discrepancy. 11 CFR §104.10

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): "reimbursement" and "consulting". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Please clarify all expenditures made for "advertising" on Schedule(s) H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E, or F supporting Lines 23, 24, or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

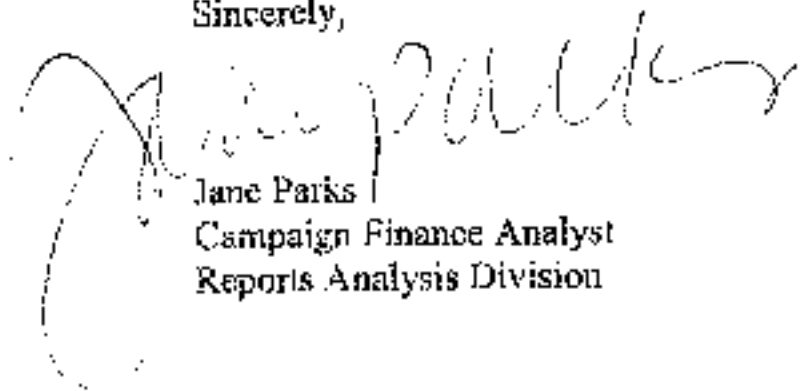
VICTORY 2002  
PAGE 3

-Schedule H4 of your report discloses activity which is 100% federal. For future reporting, please be advised that any activity which is financed entirely by the federal account (including administrative expenses), should be reported on Schedule B supporting Line 21(b). 11 CFR §106.5

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Transfers from affiliated/other party committees should be properly disclosed on a separate Schedule A, supporting Line 12 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. 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 need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Jane Parks  
Campaign Finance Analyst  
Reports Analysis Division

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

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

FOR LINE NUMBER:		PAGE 19 of 145	
(check only one)			
<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input checked="" type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16 <input type="checkbox"/> 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)  
Victory 2002

**A.** Full Name (Last, First, Middle Initial)  
American Health Care Association

Mailing Address  
1261 L Street N.W.  
City: Washington State: DC Zip Code: 20005

Date of Receipt  
M M / D D / Y Y Y Y  
09 / 27 / 2002

FEC ID number of contributing federal political committee: C00006080

Name of Employer: Occupation: contribution

Amount of Each Receipt this Period: 5000.00

Receipt For: Primary General Other (specify)   
Aggregate Year-to-Date: 5000.00

Transaction ID: SA11C.4918

**B.** Full Name (Last, First, Middle Initial)  
Committee to re-elect Harold Ford Jr

Mailing Address  
5120 Barry Road  
City: Memphis State: TN Zip Code: 38117

Date of Receipt  
M M / D D / Y Y Y Y  
08 / 28 / 2002

FEC ID number of contributing federal political committee: C00316141

Name of Employer: Occupation: contribution

Amount of Each Receipt this Period: 20000.00

Receipt For: Primary General Other (specify)   
Aggregate Year-to-Date: 20000.00

Transaction ID: SA11C.4900

**C.** Full Name (Last, First, Middle Initial)  
Congressman Ben Gordon Committee

Mailing Address  
P.O. Box 2008  
City: Murfreesboro State: TN Zip Code: 37133-2005

Date of Receipt  
M M / D D / Y Y Y Y  
07 / 17 / 2002

FEC ID number of contributing federal political committee: C00196915

Name of Employer: Occupation: contribution

Amount of Each Receipt this Period: 10000.00

Receipt For: Primary General Other (specify)   
Aggregate Year-to-Date: 10000.00

Transaction ID: SA11C.4289

**SUBTOTAL** of Receipts This Page (optional) ..... ▶ 35000.00

**TOTAL** This Period (last page this line number only) ..... ▶

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

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

FOR LINE NUMBER:		PAGE 101 of 149	
(check only one)			
<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input checked="" type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16 <input type="checkbox"/> 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)  
Victory 2002

Full Name (Last, First, Middle Initial) A. Friends of John Tanner		Date of Receipt M M D D Y Y Y Y 08 28 2002
Mailing Address P.O. Box 1994		Amount of Each Receipt this Period 2500.00
City Union City	State Zip Code TN 38281	
FEC ID number of contributing federal political committee C00223230		
Name of Employer	Occupation	
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 5000.00	Transaction ID: SA11C.4807

Full Name (Last, First, Middle Initial) B. Gayle Ray For Congress		Date of Receipt M M D D Y Y Y Y 08 28 2002
Mailing Address 1116 Draughton Ave.		Amount of Each Receipt this Period 1500.00
City Nashville	State Zip Code TN 37204	
FEC ID number of contributing federal political committee C00378508		
Name of Employer	Occupation contribution	
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 1500.00	Transaction ID: SA11C.4784

Full Name (Last, First, Middle Initial) C. IBEW C.O.P.E		Date of Receipt M M D D Y Y Y Y 09 17 2002
Mailing Address 1125 15th Street NW		Amount of Each Receipt this Period 3000.00
City Washington	State Zip Code DC 20005	
FEC ID number of contributing federal political committee		
Name of Employer	Occupation contribution	
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 3000.00	Transaction ID: SA11C.4831

SUBTOTAL of Receipts This Page (optional)	29500.00
TOTAL This Period (last page this has number only)	64500.00

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60  
61  
62  
63  
64  
65  
66  
67  
68  
69  
70  
71  
72  
73  
74  
75  
76  
77  
78  
79  
80  
81  
82  
83  
84  
85  
86  
87  
88  
89  
90  
91  
92  
93  
94  
95  
96  
97  
98  
99  
100