



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

December 9, 2009

William James Black, Treasurer
The Leadership Circle PAC
P.O. Box 2888
Raleigh, NC 27602

Response Due Date:
January 13, 2010

Identification Number: C00394916

Reference: Mid-Year Report (1/1/09 – 6/30/09)

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 2 items:

1. Schedule A supporting Line 12 of your report discloses a receipt from "NC Leadership Committee" for "Reimb of JFC Travel Exp" totaling \$15,000.00 on 1/22/09. Schedule A supporting Line 15 of your report discloses a receipt from the "Republican National Committee" for "Refund of 10/7/09 [sic] Travel Deposit" totaling \$12,151.83 on 5/13/09. However, your previous reports only appear to disclose one disbursement to support these receipts. The 12 Day Pre-General Report discloses a disbursement to the Republican National Committee for "JFC – TRAVEL DEPOSIT" for \$15,000.00 on 10/7/08. Please clarify which of the aforementioned receipts on Schedule A are related to the aforementioned disbursement on your previous report. Further, please provide clarifying information regarding the nature of the remaining receipt, including when the original disbursement was made to support such a transaction, and amend your report(s) as appropriate.
2. Schedule B supporting Line 29 of your report discloses disbursements to "Elizabeth Dole, Inc." and "North Carolina Republican Party – Federal" for "PRO-RATA ALLOCATION OF JFC TRAVEL DEPOSIT REFUND." However, it is unclear which receipt(s) on Schedule A of your report(s) supports these transactions. Please amend your report to clarify this apparent discrepancy.

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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) 694-1159.

Sincerely,



Allen Norfleet
Campaign Finance Analyst
Reports Analysis Division

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