

ETEXT ATTACHMENT

07/15/2005 21 : 14

July 15, 2005
BY ELECTRONIC DELIVERY

Edward D. Ryan
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Letter dated June 15, 2005, regarding October Monthly Report (9/1/04-9/30/04)

Dear Mr. Ryan:

On behalf my client, the Republican Party of Louisiana ("the Party"), I am writing in response to the Commission's letter dated June 15, 2005, regarding the Party's October Monthly Report (9/1/04-9/30/04). Please note that the Party filed an amendment to the October Monthly Report on July 8, 2005. The amendment addressed an issue raised by the Commission concerning the August Monthly Report (7/1/04-7/31/04).

First, the Commission asked the Party to classify a receipt listed on Line 17 of the October Monthly Report. On or about September 3, 2004, The Billy Tauzin Congressional Committee transferred \$35,000 in excess campaign funds to the Party. The Federal Election Campaign Act, as amended, permits principal candidate committees to transfer unlimited sums to state political parties. See 2 U.S.C. 439a; 11 C.F.R. 113.2(c). Therefore, the Party properly listed the receipt on Line 17. For additional clarification, the Party has designated the itemization as a "transfer of excess funds" on the amendment to the October Monthly Report.

Second, the Commission has asked the Party to clarify all expenditures made for a "Facility Rental" on Schedule B and Schedule H of the original October Monthly Report.

" On Schedule B, the Party's report listed a \$2,750 payment to 401 Veterans Limited on September 1, 2004. The purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for an office rental. The Party did not rent the office on behalf of any specifically identified federal candidate.

" On Schedule B, the Party's report listed a \$2,000 payment to the Cajun Dome on September 22, 2004. The purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for a State Party Convention. The Party did not rent the facility on behalf of any specifically identified federal candidate.

" On Schedule H4, the Party's report listed a \$1,286 payment to Jacquin Grand Children, LLC on September 1, 2004. The purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for an office rental. The Party did not rent the office on behalf of any specifically identified federal candidate.

" On Schedule H4, the Party's report listed a \$1,925 payment to R&C Properties, LLC on September 1, 2004. The purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for an office rental. The Party did not rent the office on behalf of any specifically identified federal candidate.

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" On Schedule H4, the Party's report listed a \$44 payment to The Storage Center on September 13, 2004. The purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for office storage rental. The Party did not rent the storage space on behalf of any specifically identified federal candidate.

Third, the Commission requested a clarification of the terms "Admin - Professional Services, Professional Services, FEA Consulting, and Fundraising and Consulting," which the Party used to describe disbursements listed on Schedule B and Schedule H4 of its original October Monthly Report. The Party's report listed thirteen disbursements with these descriptions:

" A \$3,500 payment to PR Louisiana on September 28, 2004 for "Fundraising Consulting." The Party's amendment explains that the purpose of this disbursement was "Fundraiser Event Coordinator." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$1,219.22 payment to Direct Mailing Services, Inc. on September 22, 2004 for "FEA Consulting." The Party's amendment to this report explains that the purpose for this disbursement was "Strategy Consultant." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$6,250 payment to Sentinel 21 on September 27, 2004 for "FEA Consulting." The Party's amendment to this report explains that the purpose for this disbursement was "Volunteer Coordinator." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$185 payment to Anna Thompson on September 7, 2004 for "Admin - Professional Services." The Party's amendment to this report explains that the purpose for this disbursement was "clerical services." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$360 payment to Connor Best on September 7, 2004 for "Admin - Professional Services." The Party's amendment to this report explains that the purpose for this disbursement was "clerical services." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$147.50 payment to Jeanne Leveque on September 7, 2004 for "Admin - Professional Services." The Party's amendment to this report explains that the purpose for this disbursement was "clerical services." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$80 payment to Nicole Licardi on September 7, 2004 for "Admin - Professional Services." The Party's amendment to this report explains that the purpose for this disbursement was "clerical services." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$520 payment to Postlethwaite & Netterville on September 13, 2004 for "Professional Services." The Party's amendment to this report explains that the purpose for this disbursement was "Accounting Services." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$2,760 payment to Postlethwaite & Netterville on September 17, 2004 for "Professional Services." The Party's amendment to this report explains that the purpose for this disbursement was "Accounting Services." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$122.50 payment to Anna Thompson on September 22, 2004 for "Professional Services." The Party's amendment to this report explains that the purpose for this disbursement was "clerical services." This disbursement was not on behalf of any specifically identified federal candidate.

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" A \$345 payment to Connor Best on September 22, 2004 for "Professional Services." The Party's amendment to this report explains that the purpose for this disbursement was "clerical services." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$195 payment to Jeanne Leveque on September 22, 2004 for "Admin - Professional Services." The Party's amendment to this report explains that the purpose for this disbursement was "clerical services." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$365 payment to Nicole Licardi on September 22, 2004 for "Admin - Professional Services." The Party's amendment to this report explains that the purpose for this disbursement was "clerical services." This disbursement was not on behalf of any specifically identified federal candidate.

From June 8, 2005, through July 8, 2005, the Commission delivered a total of thirteen letters to the Party, each asking numerous specific questions about the Party's 2004 campaign finance disclosures. Eight of the letters listed deadlines for July 15, 2005. To date, the Party has filed eight report amendments in response to these inquiries. Although this reply does not address some of the issues raised by the Commission's July 15 letters, we have worked diligently to investigate each matter, and will continue to do so in order to ensure accurate reporting. Because of the Party's obligation to certify that each report is "true, correct and complete," it is inappropriate for the Party to submit additional amended reports at this time. The Party will submit necessary amendments in the coming days after concluding its investigation of questions raised by the Commission.

If you have questions or require additional information, please do not hesitate to contact me at (202) 756-6003.

Sincerely,

Bobby R. Burchfield
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