

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

October 8, 2015

ROBERT H. FRANK, TREASURER NATIONAL DRAFT BEN CARSON FOR PRESIDENT COMMITTEE 370 MAPLE AVENUE W SUITE 4 VIENNA, VA 22180-5615

Response Due Date 11/12/2015

## IDENTIFICATION NUMBER: C00548420

REFERENCE: MID-YEAR REPORT (01/01/2015 - 06/30/2015)

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 5 item(s):

1. Your report discloses a negative ending cash balance of 653,897.24. This suggests that you have overdrawn your account, made a mathematical error, or incurred a debt. If your committee has incurred a debt or obligation, please itemize this debt on Schedule D, show a zero balance on Line 8 of the Summary Page and include the amount on Line 10. Please file an amendment to your report to accurately disclose your financial activities. (52 U.S.C. 30104(b)(8) (formerly 2 U.S.C. 434(b)(8)) and 11 CFR § 104.3(d))

**2.** On Schedule B supporting Line 21(b), you have itemized disbursements for which you have failed to include the address. Please amend your report to include the missing information.  $(11 \text{ CFR } \S 104.3(b)(3))$ 

**3.** Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "Fulfillment Items," "Grassroots," "Agency Fee," "Agency Fee - Online," and "Promotional Items." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate of disbursement purposes published in the Federal Register can be found at

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http://www.fec.gov/law/policy/purposeofdisbursement/inadequate\_purpose\_list \_3507.pdf.

**4.** Schedule B discloses reimbursements to individuals for "Travel & Meals" and "Travel & Office Supplies." 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 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)

**5.** Your report discloses debts owed to Campaign Funding Direct with an outstanding beginning balance of \$164,125.19. The previous report filed by your committee discloses a closing balance of \$157,525.69. These amounts should be the same. Please correct this discrepancy and file an amendment to your report(s). (52 U.S.C. §30104(b) (formerly 2 U.S.C. §434(b)(8)) and 11 CFR §104.11)

- For your information and consideration when preparing future filings, all contributions received that aggregate \$200 or less per individual for the calendar year should be reported on Line 11(a)(ii). Contributions received aggregating over \$200 per individual for the calendar year should be reported on Line 11(a)(i) and itemized on Schedule A. (11 CFR \$104.3(a)(4)) For your next filing, please refer to the instructions for each line when determining the proper categorization(s).

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.

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<u>Electronic filers must file amendments (to include statements, designations and reports)</u> 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.

Sincerely,

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Kevin Fortkiewicz Senior Campaign Finance Analyst Reports Analysis Division

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