FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 13, 2008

Steven J. Durham, Treasurer
Tancredo for a Secure America
501 Church Street, Suite 212
Vienna, VA 22180

Response Due Date:
April 14, 2008

Identification Number: C00431619

Reference: Amended Year End Report (10/1/07 – 12/31/07), received 2/1/08

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 18 items:

1. Your report contains incorrect Column B figures for Lines 17(a), 17(b), 17(e), 19(b), 19(c), 22, 23 and 30 of the Summary and Detailed Summary Page information. When aggregating and reporting receipts and disbursements, candidate committees are required to disclose their activity on an election-cycle basis, from 11/3/04 to 11/4/08. Please amend your report to show election cycle-to-date figures for all aggregate amounts. (2 U.S.C. § 434(b))

2. The beginning cash balance of this report does not equal the ending balance of your Amended October Quarterly Report, received January 31, 2008. Please correct this discrepancy and amend all subsequent reports(s) that may be affected by the correction. (2 U.S.C. § 434 (b))

3. Line 20(a), Column A, of the Detailed Summary Page information discloses $110,643.77 in offsets to operating expenditures. Schedule A-P supporting Line 20(a) itemizes $110,296.76 in offsets to operating expenditures. Please correct this discrepancy and file an amendment to your report. (11 CFR § 104.3(a))

4. Line 28(a), Column A, of the Detailed Summary Page information discloses $20,680.00 in contribution refunds to individuals and persons. Schedule B-P supporting Line 28(a) itemizes $19,405.00 in contribution refunds. Please correct this discrepancy and file an amendment to your report. (11 CFR § 104.3(b))

5. Some of the contributions itemized on Schedule A of your report appear to have incorrect values in the "Election Cycle-to-Date" field. This field should reflect the total amount that the committee received from the contributor in the current election cycle, from 11/3/04 through the date of receipt of the contribution. (11 CFR § 104.3(a)(3)) Some of the election cycle-to-date totals reported on your Schedule A do not appear to include all contributions from the contributor received in this election cycle. Failure to correctly total contributions received from a given source in the election cycle could lead to acceptance of excessive contributions by the committee. Please note that this problem frequently occurs when the contributor name is entered in the committee's electronic reporting database more than once using a different spelling and/or format. This prevents the database from properly aggregating contributions from the same individual or entity. Entering correct election cycle dates and ensuring that the name of each contributor is entered into the database only once would help avoid election cycle-to-date errors. When reporting contributions from political action committees, using the contributor's FEC identification number will help prevent duplicate entries.

Please review your procedures for compliance with this requirement and amend your report(s) as necessary. Incorrect aggregate election cycle to date totals for contributors listed on your report include the following:

Name	Date	Amount	Reported ECTD Total	ECTD Total Calculated by the FEC
Blalack, Joe Ray	11/8/07	$35.00	$695.00	$945.00
Brown, Allan	10/8/07	$100.00	$800.00	$2,000.00
Collins, Gary Carl	11/2/07	$50.00	$250.00	$600.00
Covert, Donovan	11/5/07	$25.00	$230.00	$530.00
Downey, James B.	12/6/07	$400.00	$2,300.00	$2,550.00
Gawne, Timothy	11/20/07	$100.00	$250.00	$750.00
Goddard, Diane	12/17/07	$100.00	$950.00	$1,000.00
Marble, J.D.	12/27/07	$25.00	$330.00	$730.00
Richardson, Robert	12/3/07	$500.00	$750.00	$1,000.00
Santelli, Yi	12/6/07	$150.00	$1,300.00	$1,450.00
Simmons, Victor	12/10/07	$100.00	$410.00	$865.00
Slatecard.com PAC	11/5/07	$250.00	$0.00	$250.00
Thies, Mark C.	9/18/07	$150.00	$600.00	$850.00
Wade, Jeryl Mr.	11/20/07	$200.00	$450.00	$800.00

If you need more information, please contact the undersigned analyst.

6. For future reports, please be advised that contributions to other committees or charitable organizations are not operating expenditures. These amounts should be disclosed on Line 29 of the Detailed Summary Page information and itemized on a separate Schedule B-P. (11 CFR § 104.3(b)(2))

7. The election cycle-to-date totals for certain entries on your report indicate that additional contributions should have been itemized. When contributions from an individual reach $200 for an election cycle, each subsequent contribution from that individual must be itemized, regardless of the amount. Additionally, each contribution from a political committee must be itemized, regardless of the amount (2 U.S.C. § 434(b) and 11 CFR § 104.3(a)(4)) . Please amend your report to correct the discrepancies in the aggregate totals for the following:

Name	Date	Amount	Reported ECTD Total	ECTD Total Calculated by the FEC
Jenkins, John I.	11/5/07	$250.00	$1,000.00	$750.00
Macleod, Kevin M.	11/30/07	$100.00	$1,000.00	$700.00
Oden, Ray P. Jr.	11/6/07	$100.00	$2,900.00	$1,400.00
Price, Mary R. Mrs.	11/1/07	$100.00	$2,150.00	$1,750.00
Rose, Richard A.	11/9/07	$50.00	$940.00	$640.00
Sheppard, Joseph	11/9/07	$100.00	$475.00	$250.00
Shuford, Thomas	10/11/07	$200.00	$1,200.00	$900.00
Soldes, Iona R.	11/23/07	$400.00	$1,550.00	$1,450.00
Starke, Helena M.	11/28/07	$25.00	$625.00	$565.00
Thies, Evanne J.	10/24/07	$150.00	$400.00	$150.00
Ward, Harmon	12/14/07	$100.00	$1,575.00	$1,325.00

If you need more information, please contact the undersigned analyst.

8. The loan payment for First Bank of South Jeffco disclosed on Line 23 of Schedule B-P does not equal the loan payment itemized on Schedule C-P for the First Bank of South Jeffco. Each loan payment made by the committee must be itemized on Line 27(b) of Schedule B-P regardless of the amount of the payment. Please correct this discrepancy and file an amendment to your report. (11 CFR § 104.3(b)(4)(iii))

9. Your committee has previously established that it has been using "best efforts" to obtain the occupations and names of employers for contributors. This report discloses a significant increase in the number of entries for which the occupations and/or employers are not provided. Please note that the committee must make, in addition to the original solicitation, at least one additional written or oral request for the information within 30 days of

the receipt of the contribution. A written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the contribution and must include a pre-addressed post card or envelope for the contributor's response. An oral request must be documented in writing. (11 CFR §§ 104.3(a)(4)(i) and 104.7)

10. Contributions from individuals and persons other than political committees must be itemized when the aggregate total from the contributor exceeds $200 in an election cycle. This means that the committee does not have a reporting requirement of a contribution until the aggregate total exceeds the $200 threshold. (2 U.S.C. § 434(b)(3)) Should a committee wish to disclose contributions that do not require itemization, it must do so on a separate Schedule A-P and report the total amount of the contributions not requiring itemization on Line 11(a)(ii), unitemized contributions, of the Detailed Summary Page information. (11 CFR § 104.3(a)(4)(i))

11. Schedule A-P of your report contains entries for contributions made by more than one person. For contributions made by more than one individual in a single written instrument, you must report the amount attributed to each contributor along with all the required contributor information (full name, address, occupation and employer) in a separate entry for each person. See 11 CFR §§ 100.12, 104.8(a), (b) and (d)(1) and the Campaign Guide for Congressional Candidates for additional clarification.

12. On Schedule B-P of your report, you have itemized disbursements for which you have failed to include the address and purpose. Please amend your report to include the missing information. (11 CFR § 104.3(b)(4))

13. Commission Regulations define the term "purpose" to mean a brief statement or description of why a disbursement was made. Examples are "dinner expense," "media," "salary," "polling," "travel," "party fees," "phone banks," "travel expenses," "travel expense reimbursement," and "catering costs." Examples of election day and voter registration activity include "exit polling," "door-to-door get out the vote," "get out the vote phone calls," and "driving voters to the polls." Unacceptable descriptions, which require additional clarification, include but are not limited to "advance," "consulting," "political consulting," "commission," "**contract labor**," "retainer," "election day expense," "**expenses**," "invoice," "support," "expense **reimbursement**," "miscellaneous," "professional services," "get-out-the-vote," "voter registration," **"10/31/07 statement" "$657.10", "advance on expenses", "backpay","C004441", "campaign event expense", "campaign materials" "credit card expenses", "DM12" "debt repayment"**, and **"promotional material"**. (11 CFR § 104.3(b)(4)(A))

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/notice_2006-23.pdf. Please amend Schedule B-P of your report to correct the descriptions that do not meet the requirements of the Regulations.

14. Schedule B-P of your report discloses disbursements to credit card companies. When reporting payments to credit card companies, if the payment to the original vendor aggregates in excess of $200 in an election cycle, you must itemize, as a memo entry, the name and address of the original vendor, together with the date, amount and purpose of the expenditure. If itemization is not necessary, you must indicate so in an amendment to this report. Please correct your report to include the missing information. (11 CFR § 104.9(a) & (b))

15. Schedule B-P of your report discloses reimbursements to individuals for transactions other than travel, meals and lodging. Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of $200 in an election cycle, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. If itemization is not necessary, you must indicate so in an amendment to this report. Please correct your report to include the missing information. (11 CFR § 104.9(a) & (b))

16. Schedule B-P of your report discloses reimbursements to staff for apparent travel and subsistence advances in which the total amount reimbursed exceeds $500. When the reimbursement amount to staff for travel and subsistence advances exceeds $500, the payments by staff to any one vendor that make up the reimbursement may have to be itemized. For example, if the campaign related payments to any one vendor by the campaign/staff aggregate in excess of $200 for the election cycle, the staff 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 AO 1996-20 for additional clarification. (11 CFR § 104.9)

17. Schedule C-P of your report fails to include information required by Commission Regulations. With every report submitted, you must provide the date incurred, the original source and amount of the loan, the due date, the interest rate, the cumulative payment, and the outstanding balance. In addition, if there are any endorsers or guarantors, their mailing address along with the name of their employer and occupation must be disclosed. Please amend your report to include the due date. (11 CFR §§ 100.52(a), 100.52(b) and 104.3(d))

18. Your report discloses a loan from a lending institution; however, you have not submitted a Schedule C-P-1 and a copy of the loan agreement. As an electronic filer, you must submit the Schedule C-P-1 electronically without the original signature from the lending institution. In addition, you must mail a copy of the loan agreement and a separate copy of the Schedule C-P-1 that contains the original signature from the lending institution. Schedule C-P-1 can be downloaded from the FEC website at http://www.fec.gov, or requested through the FEC Faxline at (202) 501-3413. Please amend your report to provide these missing documents. (11 CFR §§ 104.3(d)(1) and (2), 104.18(h))

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.**

<u>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</u>. 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) 694-1168.

Sincerely,

Michelle Lee Grant

Michelle Lee Grant
Senior Campaign Finance Analyst
Reports Analysis Division

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