



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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January 20, 2006

Christopher J. Ward, Treasurer
National Republican Congressional Committee
320 First Street
Washington, DC 20003

**Response Due Date:
February 21, 2006**

Identification Number: C00075820

Reference: September Monthly Report (8/01/05-8/31/05)

Dear Mr. Ward:

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. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule A of your report discloses contributions from political committees that fail to include a full and/or recognizable name. Reporting only the name of the connected organization, abbreviating the name of the committee so it is unrecognizable, or using an indistinguishable acronym is inadequate. The following committee names from your report need further clarification: "Meba Retirees Group Fund."

Please amend your report to include the missing information. 11 CFR §§100.12, 102.14(c) and 104.3(a)(4)(ii)

-Schedule A supporting Line(s) 11(c) of your report discloses a receipt(s) from "Knollenberg For Congress Committee," "Kolbe For Congress," "Terry Everett For Congress," "Cannon For Congress," "Hefley For Congress," "Heather Wilson For Congress," "Judy Biggert For Congress," "Robert Aderholt For Congress," "Kirk For Congress, Inc.," "Kline For Congress," "Tom Feeney For Congress," "Turner For Congress," "Rogers For Congress," "Neugebauer Congressional Committee," "Gingrey For Congress," "Chocola For Congress, Inc.," "Rick Renzi For Congress," "Charles Boustany Jr. For Congress," "Lungren For Congress," and "Jeff Fortenberry For U. S. Congress Committee" which requires further

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clarification. For example, if this activity represents a transfer of funds, please indicate "transfer" on Schedule A supporting Line 11(c) of your report. If this activity represents a reimbursement for services provided to this committee, please indicate this on Schedule A supporting Line 15 of your report. Please amend your report to clarify the type of activity this receipt(s) represents.

-Schedule A supporting Line 15 of your report discloses a payment(s) from a federal candidate committee(s) for goods and/or services provided by your committee. 11 CFR §100.52(d)(1) states that "...the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution." Examples of goods and services include equipment, supplies, personnel, membership lists and mailing lists. The term "usual and normal charge" for goods is defined as "...the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution". The usual and normal charge for services is defined as "...the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the services were rendered." 11 CFR §100.52(d)(2)

Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided to the federal candidate committee(s) and explain the steps your committee took in determining the amount(s) charged. If your committee provided the goods and/or services at less than the usual and normal charge, the difference between the two is considered to be an in-kind contribution by your committee to the federal candidate committee(s) and is subject to the limits set forth at 2 U.S.C. §441a. (11 CFR §100.52(d)(1))

-Schedule A supporting Line 15 of your report discloses a payment(s) from an individual for apparent goods and/or services provided by your committee. Pursuant to Advisory Opinion 1979-18, the sale/purchase price paid to a political committee could involve the receipt of a contribution from a purchaser if the purchase price exceeds the "usual and normal charge." The term "usual and normal charge" for goods is defined as the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution. Examples of goods and services include equipment, supplies, personnel, advertising services, membership lists, and mailing lists. 11 CFR §100.52(d)(1)

Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided and explain the steps your committee took in determining the amount charged. If your

committee provided the goods and/or services at more than the usual and normal charge, the difference between the two is considered to be contribution(s) received by your committee from an individual and may be prohibited subject to the limits set forth at 2 U.S.C. §§441a(f) and 441b or 11 CFR §110.1(d).

-The coordinated expenditure schedule (Schedule F) should disclose the following information: the identification of the designating committee, the payee's name and address, the purpose of the expenditure, the identification of the candidate supported, the office sought, state and district (if applicable), the date and amount of the payment and the aggregate general election expenditure total for each candidate supported. Please amend Schedule F by providing the identification of the designating committee. 2 U.S.C. §441a(d)

-You have received contributions from numerous entities, which appear to be unincorporated proprietorships or partnerships. Generally, these types of contributions are to be attributed to each person based on their percentage of ownership in the firm. Each person who has contributed in excess of \$200 since January 1 should be identified by name, address, occupation, name of employer, amount of contribution, and aggregate total on Schedule A. 11 CFR §110.1(e) Please amend your report by providing the omitted information.

-Schedule B supporting Line 23 of your report discloses apparent in-kind contributions made on behalf of federal candidates. Separate entries are disclosed for each federal candidate receiving the in-kind services, and additional lump-sum entries are disclosed for the vendors providing those services. This method of reporting misstates your committee's activity by double counting the expenditures for in-kind contributions. Please be advised that in-kind contributions to federal candidates should be reported properly using the following method: payments to the vendor(s) should be disclosed as memo entries on Schedule B supporting Line 21(b) of the Detailed Summary Page, and the federal candidates receiving the in-kind services should be disclosed in separate non-memo entries on Schedule B supporting Line 23.

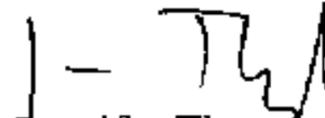
Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the

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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.

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) 694-1143.

Sincerely,



Jennifer Thangavelu
Campaign Finance Analyst
Reports Analysis Division

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