



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

July 18, 2019

JAMES R. ORCUTT, TREASURER  
PHILLIPS 66 PAC  
601 PENNSYLVANIA AVENUE, NW, STE. 1150N  
WASHINGTON, DC 20004

**Response Due Date**  
**08/22/2019**

IDENTIFICATION NUMBER: C00513549

REFERENCE: MARCH MONTHLY REPORT (02/01/2019 - 02/28/2019)

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 1 item(s):

- Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The attached employer name and occupation entries appear on your report and are not considered acceptable.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand

PHILLIPS 66 PAC

Page 2 of 3

alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

**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. For additional information about the report review process or specific filing information for your committee type, please visit <http://transition.fec.gov/rad/>. 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) 694-1177.

PHILLIPS 66 PAC

Page 3 of 3

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Jones". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Brian Jones  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division

321

**Inadequate Employer/Occupation Entries  
Phillips 66 PAC (C00513549)**

<b>Employer</b>	<b>Occupation</b>
Phillips 66 Company	AVR BSNS DVLPT B
Phillips 66 Company	AVR CMML D
Phillips 66 Company	AVR STRAT. SOURCING A
Phillips 66 Company	PL3 CMML
Phillips 66 Company	PL4 MAJOR PRJTS
Phillips 66 Company	PL4 OPS
Phillips 66 Company	PL5 REF
Phillips 66 Company	PL5 REF OPS
Phillips 66 Company	PL5 REF SR
Phillips 66 Company	PL6 BP F&A ORG SR
Phillips 66 Company	PL6 NGL BD
Phillips 66 Company	PL6 REF OPS SR
Phillips 66 Company	PL7 HRBP SR
Phillips 66 Company	PL7 HSE ENV REF SR
Phillips 66 Company	PL7 HSE PROCESS SFTY REF AV
Phillips 66 Company	PL7 REF PROCESS CONTROLS SR
Phillips 66 Company	TRD CRUDE D