



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

August 6, 2008

Tim Morgan, Treasurer  
Republican National Committee  
310 First Street, SE  
Washington, DC 20003

**Response Due Date:  
September 8, 2008**

Identification Number: C00003418

Reference: Amended June Monthly Report (5/1/08-5/31/08), received 8/1/08

Dear Treasurer:

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. **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 items:

1. Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(c) prohibit a political committee which is established and maintained by a national political party, and any affiliated committees, from accepting contributions from a person or non-multicandidate political committee in excess of \$28,500 in a calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

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If the foregoing conditions for reattributions were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any refunds should be disclosed on Schedule B supporting Line 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution or refund the excessive amount will be taken into consideration.

2. Schedule A of your report discloses one or more contributions totaling \$5,000.00 from "Lorillard Tobacco Company," which appears to be a corporation(s). 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received a prohibited contribution(s), you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR §103.3(b)(1).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

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Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

3. Schedule A of your report discloses one or more contributions totaling \$5,400.00 from "Jack Brothers Associates, L.L.C.," which appears to be a corporation(s). 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation. Limited liability companies (LLC's) that choose to be treated as corporations under the Internal Revenue Service rules, or have shares that are traded publicly, are considered corporations. In the event that the LLC is treated as a partnership under IRS rules, the aforementioned contributions are to be attributed to each member in direct proportion to his or her share of the LLC's profit or by agreement of its members. Each member who has contributed in excess of \$200 for the calendar year should be identified by name, address, amount of contribution, name of employer, occupation and aggregate total on Schedule A. 11 CFR §110.1(g)(1) through (5).

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received a prohibited contribution(s), you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR 103.3(b)(1).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

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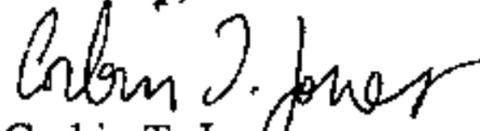
4. Schedule A of your report discloses an aggregate year-to-date total(s) for a contribution(s) received from Margaret M. Bloomfield, Mark Morse, Jennifer L. Parr and Alexander J. Roepers which appears to be incorrect. Please amend your report to provide the correct aggregate year-to-date total(s).

5. Schedule A supporting Line 12 of your report discloses transfers from apparent joint fundraising committees. In addition, your report includes memo entries on Schedule A for what appears to be your committee's share of the gross contributions received through these joint fundraising efforts. Please amend your report to clearly identify on the Schedule A, which joint fundraising committee each memo entry relates to.

**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. 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.

Sincerely,



Corbin T. Jones

Senior Campaign Finance Analyst

Reports Analysis Division

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| Contributor Name             | Date    | Amount      | Report                |
|------------------------------|---------|-------------|-----------------------|
| Beck, Philip Mr.             | 3/25/08 | \$5,000.00  | 2008 April Monthly    |
| Beck, Philip                 | 5/29/08 | \$28,500.00 | 2008 June Monthly     |
| Bloomfield, Margaret M. Mrs. | 1/29/08 | \$1,000.00  | 2008 February Monthly |
| Bloomfield, Margaret M. Mrs. | 4/25/08 | \$25,000.00 | 2008 May Monthly      |
| Bloomfield, Margaret M. Mrs. | 5/5/08  | \$500.00    | 2008 June Monthly     |
| Bloomfield, Margaret M.      | 5/29/08 | \$3,500.00  | 2008 June Monthly     |
| Boone, Harper D. Mr.         | 3/28/08 | \$28,500.00 | 2008 April Monthly    |
| Boone, Harper D.             | 5/29/08 | \$2,300.00  | 2008 June Monthly     |
| Casden, Alan I. Mr.          | 3/3/08  | \$28,500.00 | 2008 April Monthly    |
| Casden, Alan I.              | 5/29/08 | \$1,150.00  | 2008 June Monthly     |
| DeGeorge, Lawrence J. Mr.    | 2/4/08  | \$28,500.00 | 2008 March Monthly    |
| DeGeorge, Lawrence J.        | 5/29/08 | \$10,000.00 | 2008 June Monthly     |
| Edwards, Ronald Mr.          | 3/11/08 | \$27,500.00 | 2008 April Monthly    |
| Edwards, Ronald              | 5/29/08 | \$4,900.00  | 2008 June Monthly     |
| Geier, Philip H. Mr. Jr.     | 1/25/08 | \$2,000.00  | 2008 February Monthly |
| Geier, Philip H. Mr. Jr.     | 4/21/08 | \$4,000.00  | 2008 May Monthly      |
| Geier, Philip H. Jr.         | 5/29/08 | \$28,500.00 | 2008 June Monthly     |
| Lee, Sherri Parker Mrs.      | 4/1/08  | \$10,000.00 | 2008 May Monthly      |
| Lee, Sherri Parker           | 5/29/08 | \$25,000.00 | 2008 June Monthly     |
| Mathews, Donald W. Mr.       | 3/25/08 | \$28,500.00 | 2008 April Monthly    |
| Mathews, Donald W.           | 5/29/08 | \$2,300.00  | 2008 June Monthly     |
| Mathews, Tracy L. Mrs.       | 3/25/08 | \$28,500.00 | 2008 April Monthly    |
| Mathews, Tracy L.            | 5/29/08 | \$2,300.00  | 2008 June Monthly     |
| Morse, M' Lissa M. Mrs.      | 3/25/08 | \$28,500.00 | 2008 April Monthly    |
| Morse, M' Lissa M.           | 5/29/08 | \$2,300.00  | 2008 June Monthly     |
| Morse, Mark Mr.              | 3/25/08 | \$28,500.00 | 2008 April Monthly    |
| Morse, Mark                  | 5/29/08 | \$2,300.00  | 2008 June Monthly     |
| Parr, Jennifer L. Ms.        | 3/25/08 | \$28,500.00 | 2008 April Monthly    |
| Parr, Jennifer L.            | 5/29/08 | \$2,300.00  | 2008 June Monthly     |

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|----------------------------|---------|-------------|--------------------|
| Roepers, Alexander J. Mr.  | 4/21/08 | \$4,000.00  | 2008 May Monthly   |
| Roepers, Alexander J.      | 5/29/08 | \$28,500.00 | 2008 June Monthly  |
| Rothman, Robert Mr.        | 3/25/08 | \$28,500.00 | 2008 April Monthly |
| Rothman, Robert            | 5/29/08 | \$7,700.00  | 2008 June Monthly  |
| Schneider, Tami Joy        | 5/29/08 | \$1,900.00  | 2008 June Monthly  |
| Schneider, Tami Joy Mrs.   | 5/6/08  | \$28,500.00 | 2008 June Monthly  |
| Theisen, Robert W. Mr. Jr. | 3/4/08  | \$1,000.00  | 2008 April Monthly |
| Theisen, Robert W. Jr.     | 5/7/08  | \$28,500.00 | 2008 June Monthly  |
| Wachtell, Esther Mrs.      | 2/1/08  | \$15,000.00 | 2008 March Monthly |
| Wachtell, Esther           | 5/7/08  | \$15,000.00 | 2008 June Monthly  |

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