

ETEXT ATTACHMENT

07/15/2005 21 : 20

July 15, 2005
BY ELECTRONIC DELIVERY

Edward D. Ryan
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Letter dated June 15, 2005, regarding 30 Day Post-General Report (10/14/04-11/22/04)

Dear Mr. Ryan:

On behalf my client, the Republican Party of Louisiana ("the Party"), I am writing in response to the Commission's letter dated June 15, 2005, regarding the Party's 30 Day Post-General Report (10/14/04-11/22/04). Please note that the Party filed an amendment to the Post-General Report on July 8, 2005. The amendment addressed an issue raised by the Commission concerning the August Monthly Report (7/1/04-7/31/04).

First, the Commission asked the Party to classify two receipts listed on Line 17 of the original Post-General Report. On October 21, 2004, McCrery for Congress transferred \$6,000 in excess campaign funds to the Party. On November 17, 2004, The Billy Tauzin Congressional Committee transferred \$100,000 to the Party. The Federal Election Campaign Act, as amended, permits principal candidate committees to transfer unlimited sums to state political parties. See 2 U.S.C. 439a; 11 C.F.R. 113.2(c). Therefore, the Party properly listed the receipts on Line 17. For additional clarification, the Party has designated each itemization as a "transfer of excess funds" on the amendment to the Post-General Report.

Second, the Commission has asked that the Party to disclose the identification of individuals who contributed in excess of \$200 during 2004. The Party uses solicitation materials that request contributors' identifications, and administers follow-up requests for such information. The amended Post-General Report lists the addresses, occupations, and names of employers for several additional individual contributors.

Third, the Commission requested a clarification of the terms "Admin - Professional Services, FEA Consulting, FEA Professional Services, Fundraising Expense, Office Expense, and Professional Services" which the Party used to describe disbursements listed on Schedule B and Schedule H4 of the original Post-General Report. The Party's report listed twenty-four disbursements with these descriptions:

" A \$204.75 payment to City Club @ River Ranch on October 14, 2004 for a "Fundraising Expense." The Party's amendment explains that the purpose of this disbursement was for a "Food/Drink Expense for Fundraiser." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$2,050.29 payment to Direct Mail Systems, Inc. on November 3, 2004 for a "Fundraising Expense." The Party's amendment explains that the purpose of this disbursement was for a "State Fundraising Solicitation." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$169.02 payment to Connor Best on October 26, 2004 for an "Office Expense." The Party's amendment explains that the purpose of this disbursement was for "Clerical Services." This disbursement was not on behalf of any specifically identified federal candidate.

ETEXT ATTACHMENT

" A \$320 payment to Connor Best on November 10, 2004 for "Admin - Professional Services." The Party's amendment explains that the purpose of this disbursement was for "Clerical Services." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$362 payment to Ryan Booth on November 1, 2004 for an "Office Expense." The Party's amendment explains that the purpose of this disbursement was for an "Office Telephone Expense." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$223.48 payment to Charles Buckels on November 3, 2004 for a "Fundraising Expense." The Party's amendment explains that the purpose of this disbursement was for "Gas, Meals and Lodging on Fundraising Trip." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$526.59 payment to Hilton Lafayette on October 19, 2004 for a "Fundraising Expense." The Party's amendment explains that the purpose of this disbursement was for "Food/Drink Expense for Fundraiser." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$275 payment to Nicole Licardi on November 10, 2004 for "Admin - Professional Services." The Party's amendment explains that the purpose of this disbursement was for "Clerical Services." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$300 payment to Office Depot on October 26, 2004 for an "Office Expense." The Party's amendment explains that the purpose of this disbursement was for "Generic Office Supplies." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$500 payment to Office Depot on October 26, 2004 for an "Office Expense." The Party's amendment explains that the purpose of this disbursement was for "Generic Office Supplies." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$300 payment to Office Depot on October 26, 2004 for an "Office Expense." The Party's amendment explains that the purpose of this disbursement was for "Generic Office Supplies." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$204.53 payment to SSW and Associates on November 10, 2004 for an "Office Expense." The Party's amendment explains that the purpose of this disbursement was a "Grassroots Seminar." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$5,000 payment to Pi Enterprises, LLC on October 29, 2004 for "FEA Professional Services." The Party's amendment explains that the purpose of this disbursement was for "Strategy/Administrative Services." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$3,173.55 payment to Pi Enterprises on November 17, 2004 for "FEA Consulting." The Party's amendment explains that the purpose of this disbursement was for "Strategy/Administrative Services." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$500 payment to Landon Allen on November 10, 2004 for "FEA Professional Services." The Party's amendment explains that the purpose of this disbursement was for a "Minority Outreach Coordinator." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$300 payment to Landon Allen on November 18, 2004 for "FEA Professional Services." The Party's amendment explains that the purpose of this disbursement was for a "Minority Outreach Coordinator." This disbursement was not on behalf of

ETEXT ATTACHMENT

any specifically identified federal candidate.

" A \$1,500 payment to Direct Mailing Service on October 26, 2004 for "FEA Professional Services." The Party's amendment explains that the purpose of this disbursement was for "Strategy Consulting." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$2,000 payment to Direct Mailing Service on November 10, 2004 for "FEA Professional Services." The Party's amendment explains that the purpose of this disbursement was for "Strategy Consulting." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$110 payment to Connor Best on October 10, 2004 for "Admin - Professional Services." The Party's amendment explains that the purpose of this disbursement was for "Clerical Services." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$155 payment to Jeanne Leveque on October 10, 2004 for "Admin - Professional Services." The Party's amendment explains that the purpose of this disbursement was for "Clerical Services." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$75 payment to Anna Thompson on October 21, 2004 for "Admin - Professional Services." The Party's amendment explains that the purpose of this disbursement was for "Clerical Services." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$200 payment to Nicole Licardi on October 21, 2004 for "Admin - Professional Services." The Party's amendment explains that the purpose of this disbursement was for "Clerical Services." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$180 payment to Anna Thompson on November 1, 2004 for "Admin - Professional Services." The Party's amendment explains that the purpose of this disbursement was for

"Clerical Services." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$390 payment to Nicole Licardi on November 11, 2004 for "Admin - Professional Services." The Party's amendment explains that the purpose of this disbursement was for

"Clerical Services." This disbursement was not on behalf of any specifically identified federal candidate.

Fourth, the Commission has asked the Party to clarify whether it used transfers of funds from National party committees to make payments for "FEA Bumperstickers and FEA Yard Signs." The Party did not use funds received from transfers by the National Republican Congressional Committee, National Republican Senatorial Committee, or Republican National Committee to pay for these disbursements.

Fifth, the Commission has asked the Party to clarify all expenditures made for a "Facility Rental" on Schedule B and Schedule H of the original Post-General Report.

" On Schedule B, the Party's report listed a \$1,925 payment to R&C Properties, LLC on November 3, 2004. The purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for an office rental. The Party did not rent the office on behalf of any specifically identified federal candidate.

" On Schedule B, the Party's report listed a \$1,286 payment to Jacquin Grand Children, LLC on November 3, 2004. The

ETEXT ATTACHMENT

purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for an office rental. The Party did not rent the office on behalf of any specifically identified federal candidate.

" On Schedule B, the Party's report listed a \$2,750 payment to 401 Veterans Limited on November 1, 2004. The purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for an office rental. The Party did not rent the office on behalf of any specifically identified federal candidate.

" On Schedule H4, the Party's report listed a \$500 payment to Lod Cook Conference Center on October 21, 2004. The purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for a "State Committee Meeting." The Party did not rent the facility on behalf of any specifically identified federal candidate.

Finally, the Party has amended the Post-General Report by disclosing a contribution from the Union Pacific Corp. Political Action Committee on Line 11(c) and receipts from the Republican Women's Club of Jefferson, the Slidell Republican Women's Club, and the Mississippi Republican Party on Line 12.

From June 8, 2005, through July 8, 2005, the Commission delivered a total of thirteen letters to the Party, each asking numerous specific questions about the Party's 2004 campaign finance disclosures. Eight of the letters listed deadlines for July 15, 2005. To date, the Party has filed eight report amendments in response to these inquiries. Although this reply does not address some of the issues raised by the Commission's July 15 letters, we have worked diligently to investigate each matter, and will continue to do so in order to ensure accurate reporting. Because of the Party's obligation to certify that each report is "true, correct and complete," it is inappropriate for the Party to submit additional amended reports at this time. The Party will submit necessary amendments in the coming days after concluding its investigation of questions raised by the Commission.

If you have questions or require additional information, please do not hesitate to contact me at (202) 756-8003.

Sincerely,

Bobby R. Burchfield
MCDERMOTT WILL & EMERY LLP
600 Thirteenth Street, N.W.
Washington, D.C. 20005-3096