



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 7, 2010

Karen Pichkhadze, Treasurer
NORPAC
P.O. Box 5595
Englewood, NJ 07631

Response Due Date:
June 11, 2010

Identification Number: C00247403

Reference: Amended July Monthly Report (6/1/09 – 6/30/09), received 1/29/10

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 3 items:

1. Your report discloses apparent returned contributions from your own Committee, NORPAC, with purposes of "return of chk. #1199 (blanche Lincoln)" and "return of chk #1225 (evan bayh)" on Schedule A supporting Line 16 of the Detailed Summary Page. If the check written by your committee was not cashed, you should itemize the voided check on Schedule B supporting Line 23 as a negative entry. Line 16 should be used if the recipient committee cashed your check and wrote a refund on its account. Further, the intended recipient of the initial contribution should be disclosed rather than the name of your committee. Please amend your report to correct this discrepancy or provide clarification regarding these transactions.
2. Schedule A of your report discloses earmarked contributions totaling \$15,600 for Jim Bunning. While Schedule B discloses a \$15,600 transfer on 6/10/09 of earmarked contributions to Jim Bunning, the individuals whose earmarks comprise this transfer are not disclosed on Schedule B. Further, Schedule A discloses earmarked contributions totaling \$25,535 for ERIC PAC. While Schedule B discloses a \$25,535 transfer on 6/4/09 to ERIC PAC, the individuals whose earmarks comprise this transfer are not disclosed on Schedule B. Schedule A also discloses earmarked contributions totaling \$4,000 for Howard Berman. While Schedule B

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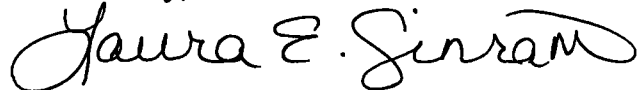
discloses a \$4,000 transfer on 6/25/09, the individuals whose earmarks comprise this transfer are not disclosed on Schedule B. Pursuant to 11 CFR §110.6(c)(1)(v), all earmarked contributions that have passed through a conduit's account must be itemized on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of amount. All earmarked contributions that have been forwarded in the form of the contributor's check or written instrument must be itemized as memo entries on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of the amount. Please amend your report to clarify these discrepancies.

3. Schedule B supporting Line 23 of your report discloses a contribution(s) to "NORPAC"; however, you have also disclosed "bunning donation-norpac" for this transaction. If this was a contribution directly to Jim Bunning from your committee, you should not disclose your committee name in the disbursement. Please amend your report to clarify the ultimate recipient of this contribution(s).

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) 694-1157.

Sincerely,



Laura E. Sinram

Senior Campaign Finance Analyst
Reports Analysis Division

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