



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

August 28, 2007

T.C. Anderson, Treasurer
Brownback for President INC.
P.O. Box 2008
2436 SW Camelot Place
Topeka, KS 66601

**Response Due Date:
September 28, 2007**

Identification Number: C00430694

Reference: July Quarterly Report (4/1/07 – 6/30/07)

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 6 items:

1. Some of the contributions itemized on Schedule A of your report appear to have incorrect values in the "Election Cycle-to-Date" field. This field should reflect the total amount that the committee received from the contributor in the current election cycle, from 11/3/04 through the date of receipt of the contribution. (11 CFR § 104.3(a)(3)) Some of the election cycle-to-date totals reported on your Schedule A do not appear to include all contributions from the contributor received in this election cycle. Failure to correctly total contributions received from a given source in the election cycle could lead to acceptance of excessive contributions by the committee. Please note that this problem frequently occurs when the contributor name is entered in the committee's electronic reporting database more than once using a different spelling and/or format. This prevents the database from properly aggregating contributions from the same individual or entity. Entering correct election cycle dates and ensuring that the name of each contributor is entered into the database only once would help avoid election cycle-to-date errors. When reporting contributions from political action committees, using the contributor's FEC identification number will help prevent duplicate entries.

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Please review your procedures for compliance with this requirement and amend your report(s) as necessary. Incorrect aggregate election cycle to date totals for contributors listed on your report include the following:

<u>Name</u>	<u>Date</u>	<u>Amount</u>	<u>Reported ECTD Total</u>	<u>ECTD Total Calculated by the FEC</u>
Fink, Ruth G.	6/27/07	\$300.00	\$300.00	\$1,800.00
Hall, Gary	6/30/07	\$500.00	\$500.00	\$1,450.00
Hebert, Richard K.	6/28/07	\$500.00	\$500.00	\$2,000.00
Hunt, Cecil	6/13/07	\$350.00	\$500.00	\$2,021.00
Mahoney, Glaadys l	6/22/07	\$150.00	\$330.00	\$750.00
Miller, F. Carl	6/25/07	\$2,000.00	\$2,000.00	\$2,900.00
Millsap, Marvin E.	6/27/07	\$1,000.00	\$1,500.00	\$2,500.00
O'Shaughnessy, Patrick	5/24/07	\$300.00	\$500.00	\$2,600.00
Powell, William G.	6/25/07	\$250.00	\$500.00	\$750.00
Stauffer, John	4/2/07	\$200.00	\$500.00	\$2,300.00
Suderman, Joe	6/29/07	\$500.00	\$895.00	\$1,395.00
Taylor, J. Joseph	5/24/07	\$100.00	\$400.00	\$700.00

If you need more information, please contact the undersigned analyst.

2. The election cycle-to-date totals for certain entries on your report indicate that additional contributions should have been itemized. When contributions from an individual reach \$200 for an election cycle, each subsequent contribution from that individual must be itemized, regardless of the amount. Additionally, each contribution from a political committee must be itemized, regardless of the amount (2 U.S.C. § 434(b) and 11 CFR § 104.3(a)(4)). Please amend your report to correct the discrepancies in the aggregate totals for:

Bfp, Anonymous
Braun William B.
Yandow, Jeanette

3. Your report discloses \$654,337.15 in un-itemized individual contributions on Line 17(a), Column A, of the Detailed Summary Page. When contributions from an individual reach \$200 for an election cycle, each subsequent contribution from that individual must be itemized, regardless of the amount. The itemization should include the full name, mailing address and zip code of the person, along with the name of his/her employer, the date of the contribution, his/her occupation, the election designation and the election cycle-to-date amount of contributions made by the person. Please amend your report to provide a Schedule A-P if

necessary, or to clarify that for the contributions in question, the aggregate total for the election cycle for each contributor does not exceed \$200. (11 CFR § 104.3(a)(4)(i))

4. Your committee has previously established that it has been using "best efforts" to obtain the occupations and names of employers for contributors. This report discloses a significant increase in the number of entries for which the occupations and/or employers are not provided. Please note that the committee must make, in addition to the original solicitation, at least one additional written or oral request for the information within 30 days of the receipt of the contribution. A written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the contribution and must include a pre-addressed post card or envelope for the contributor's response. An oral request must be documented in writing. (11 CFR §§ 104.3(a)(4)(i) and 104.7)

5. Contributions from individuals and persons other than political committees must be itemized when the aggregate total from the contributor exceeds \$200 in an election cycle. This means that the committee does not have a reporting requirement of a contribution until the aggregate total exceeds the \$200 threshold. (2 U.S.C. § 434(b)(3)) Should a committee wish to disclose contributions that do not require itemization, it must do so on a separate Schedule A-P and report the total amount of the contributions not requiring itemization on Line 11(a)(ii), unitemized contributions, of the Detailed Summary Page information. (11 CFR § 104.3(a)(4)(i))

6. Schedule A-P of your report contains entries for contributions made by more than one person. For contributions made by more than one individual in a single written instrument, you must report the amount attributed to each contributor along with all the required contributor information (full name, address, occupation and employer) in a separate entry for each person. See 11 CFR §§ 100.12, 104.8(a), (b) and (d)(1) and the Campaign Guide for Congressional Candidates for additional clarification.

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.**

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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) 694-1168.

Sincerely,



Michelle Lee Grant
Senior Campaign Finance Analyst
Reports Analysis Division

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