

HUCK★PAC

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2014 JUL 23 AM 9:00
FEC MAIL CENTER

July 15, 2014

Ms. Nicole Miller
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

RE: Huck PAC
Committee ID: C00448373
April Quarterly Report (01/01/2014 – 03/31/2014)

Dear Ms. Miller:

We are in receipt of your letter dated June 16, 2014 (copy enclosed), requesting additional information regarding the above referenced report. We offer the following response for your consideration.

Item 1:

The Commission's notice states that the April Quarterly Report filed by Huck PAC (hereafter referred to as the 'Committee') has received contributions from individuals for which the identification is not complete.

We have identified 21 donors to Huck PAC reported that the April Quarterly Report for which the donor information was incomplete. We have been able to obtain full information for 14 of those donors and have provided that information on the amended April Quarterly Report filed July 15th (FEC #938589). For the remaining 7 donors, we believe that Huck PAC has used its best efforts to obtain the information.

The Committee's solicitations contain a clear and conspicuous request for employer/occupation information, including solicitation via the website, direct mail, and fundraising events. Donors who did not include the requested information are sent a follow-up letter requesting the information.

Finally, the Committee has attempted to contact the 7 remaining donors by phone and/or email on various dates in compliance with the established "Requested Using Best Efforts" protocol.

Should the Committee receive additional employer/occupation information still missing from the amended First Quarter report, it will be included on a future amended report submitted to the Commission.

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www.huckpac.com

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Item 2:

The Commission's notice also stated that the Committee disclosed two contributions that were received from unregistered organizations and is required to provide clarification on whether the contribution received is permissible. The Committee has taken the necessary steps to confirm that the organization has established a separate account which contains only federally permissible funds.

Upon the date of receipt, Chad Gallagher, Director of the Committee, spoke with the John Carona State Campaign. A verbal confirmation was made by the campaign to verify that the account from which the contribution was made contained only federally permissible funds, and did not contain any funds from federally impermissible sources, or funds from permissible sources in amounts that exceed the federal contribution limits.

Mr. Gallagher also contacted Greene County Republican Women. A verbal confirmation was also made to verify that the account from which the contribution was made contained only federally permissible funds, and did not contain any funds from federally impermissible sources, or funds from permissible sources in amounts that exceed the federal contribution limits.

We trust that the steps that we have taken to fully report the Committee's activities and the explanation provided herein will satisfy the Commission.

Sincerely,



Bryan S. Jeffrey, Treasurer
Huck PAC

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

June 16, 2014

BRYAN JEFFREY, TREASURER
HUCK PAC
P.O. BOX 2008
LITTLE ROCK, AR 72203

Response Due Date
07/21/2014

IDENTIFICATION NUMBER: C00448373

REFERENCE: APRIL QUARTERLY REPORT (01/01/2014 - 03/31/2014).

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 2 item(s):

1. 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 following employer name and occupation entries appear on your report and are not considered acceptable: "Requested using best efforts/Requested using best efforts."

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

FROM: ANN JONES

HUCK PAC

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the requirements of federal law.

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

2. Schedule A of your report (see attached) discloses one or more contributions from an organization(s), which is not a political committee registered with the Commission. In order for your committee to accept contributions from
- unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. § 441a(f) and 441b or 11 CFR § 102.5(b). Under 11 CFR § 102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

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

FROM FRONT

HUCK PAC

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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) 694-1164.

Sincerely,



Nicole Miller
Senior Campaign Finance Analyst
Reports Analysis Division

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FROM: HNN: 101010

**Excessive, Prohibited, and Impermissible Contributions
HUCK PAC (C00448373)**

Contributions from Unregistered Organizations

Contributor Name	Date	Amount	Report
Greene County Republican Women	2/10/14	\$5,000.00	2014 April Quarterly
John Carona State Campaign	2/10/14	\$5,000.00	2014 April Quarterly

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c/o JPMS Cox, PLLC
11300 Cantrell Road, Suite 301
Little Rock, AR 72212

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07/15/2014

US POSTAGE



Ms. Nicole Miller
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

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2014 JUL 23 AM 9:00
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ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
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<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
	Next Business Day Delivery <input type="checkbox"/>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
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<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked

CMR PREPARER (8/2013)	7/23/14 DATE PREPARED
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FORM 1001-1001