



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

RQ-2

Tom H. Jackson, Treasurer  
Victory 2002-Federal Account  
223 Eighth Avenue North, Suite 200  
Nashville, TN 37203

JAN 23 2003

Identification Number: C00375444

Reference: 12 Day Pre-General Report (10/1/02-10/16/02)

Dear Mr. Jackson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) 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(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must 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.

## VICTORY 2002-FEDERAL ACCOUNT

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Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive 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. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account 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 any transfer-out or 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 transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report 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, transfer-out or refund the excessive amount will be taken into consideration.

-On Schedule H3 supporting Line 18 of the Detailed Summary Page, you have failed to provide a breakdown of transfers received by the federal account. Please amend your report to include the missing information.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): "consulting", "event expense", "reimbursement", "repairs", and "wages and reimbursement". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

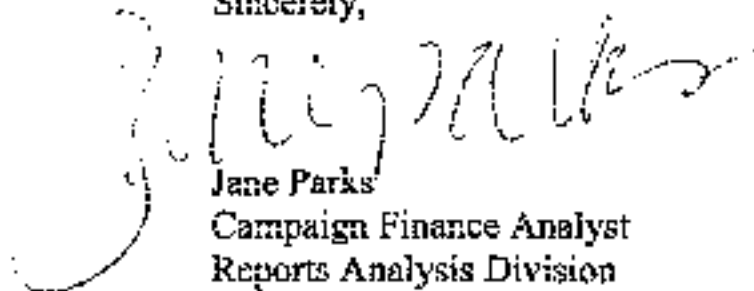
-Schedule H4 discloses payments made to credit card companies for shared federal and non-federal activity. Please be advised that these payments must identify as memo entries, the original vendors from which you have purchased an item or service regardless of the amount. Please amend your report by providing the name and mailing address of the original vendor, along with the date, amount and purpose of each expenditure. 11 CFR §104.10.

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-Schedule H4 of your report discloses activity which is 100% federal. For future reporting, please be advised that any activity which is financed entirely by the federal account (including administrative expenses), should be reported on Schedule B supporting Line 21(b). 11 CFR §106.5

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. 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 need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Jane Parks

Campaign Finance Analyst  
Reports Analysis Division

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

Use separate schedule(s) of each category of the Detailed Summary Page		FOR LINE NUMBER: (check only one)		PAGE 8 / 89	
<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input checked="" type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 17
<input type="checkbox"/> 15	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17	<input type="checkbox"/> 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)  
Victory 2002

A. Full Name (Last, First, Middle Initial) Friends of John Tanner		Date of Receipt M M / D D / Y Y Y Y 10 / 07 / 2002	
Mailing Address P.O. Box 1894		Amount of Each Receipt this Period 5000.00	
City Union City	State TN	Zip Code 38281	
FEC ID number of contributing federal political committee C00223230			
Name of Employer		Occupation	
Receipt For: Primary General Other (specify) ▼		Aggregate Year-to-Date ▼ 55000.00	
		Transaction ID: SA11C.4963	

B. Full Name (Last, First, Middle Initial) Friends of John Tanner		Date of Receipt M M / D D / Y Y Y Y 10 / 15 / 2002	
Mailing Address P.O. Box 1894		Amount of Each Receipt this Period 1000.00	
City Union City	State TN	Zip Code 38281	
FEC ID number of contributing federal political committee C00223230			
Name of Employer		Occupation	
Receipt For: Primary General Other (specify) ▼		Aggregate Year-to-Date ▼ 55000.00	
		Transaction ID: SA11C.4969	

C. Full Name (Last, First, Middle Initial) Laborers' Political League		Date of Receipt M M / D D / Y Y Y Y 10 / 08 / 2002	
Mailing Address 905 16th Street, NW		Amount of Each Receipt this Period 5000.00	
City Washington	State DC	Zip Code 20005	
FEC ID number of contributing federal political committee C00007922			
Name of Employer		Occupation	
Receipt For: Primary General Other (specify) ▼		Aggregate Year-to-Date ▼ 5000.00	
		Transaction ID: SA11C.4966	

SUBTOTAL of Receipts This Page (optional)	▶	11000.00
TOTAL This Period (last page this line number only)	▶	

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

Use separate schedule(s) or each category (if the Detailed Summary Page		FOR LINE NUMBER- (check only one)		PAGE 20 / 143	
<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input checked="" type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17			

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NAME OF COMMITTEE (In Full)  
Victory 2002

Full Name (Last, First, Middle Initial) A. Friends of John Tanner		Date of Receipt M M / D D / Y Y Y Y 08 / 28 / 2002	
Mailing Address P.O. Box 1994		Amount of Each Receipt This Period 25000.00	
City Union City	State TN	Zip Code 38281	
FEC ID number of contributing federal political committee C00223230			
Name of Employer	Occupation		
Receipt For: Primary General Other (specify) ▼		Aggregate Year-to-Date ▼ 50000.00	Transaction ID: SA11C.4807

Full Name (Last, First, Middle Initial) B. Gayle Ray For Congress		Date of Receipt M M / D D / Y Y Y Y 08 / 28 / 2002	
Mailing Address 1116 Draughon Ave.		Amount of Each Receipt This Period 1500.00	
City Nashville	State TN	Zip Code 37206	
FEC ID number of contributing federal political committee C00378585			
Name of Employer	Occupation	contribution	
Receipt For: Primary General Other (specify) ▼		Aggregate Year-to-Date ▼ 1500.00	Transaction ID: SA11C.4784

Full Name (Last, First, Middle Initial) C. IBEW C.G.P.E.		Date of Receipt M M / D D / Y Y Y Y 08 / 17 / 2002	
Mailing Address 1125 15th Street NW		Amount of Each Receipt This Period 3000.00	
City Washington	State DC	Zip Code 20005	
FEC ID number of contributing federal political committee			
Name of Employer	Occupation	contribution	
Receipt For: Primary General Other (specify) ▼		Aggregate Year-to-Date ▼ 3000.00	Transaction ID: SA11C.4831

SUBTOTAL of Receipts This Page (optional)	29500.00
TOTAL This Period (last page this line number only)	64500.00

**SCHEDULE A (FEC Form 3X)**  
**ITEMIZED RECEIPTS**

Use separate schedule(s) of each category of the Detailed Summary Page

FOR LINE NUMBER:			PAGE 7 / 32				
(check only one)							
<input type="checkbox"/>	11a	<input type="checkbox"/>	11b	<input checked="" type="checkbox"/>	11c	<input type="checkbox"/>	12
<input type="checkbox"/>	13	<input type="checkbox"/>	14	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	15
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	16
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	17

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NAME OF COMMITTEE (In Full)  
Victory 2002

Full Name (Last, First, Middle Initial) A. Friends of John Tanner		Date of Receipt M M / D D / Y Y Y Y 04 / 05 / 2002	
Mailing Address P.O. Box 1984 City State Zip Code Union City TN 38281		Amount of Each Receipt this Period 25000.00	
FEC ID number of contributing federal political committee. C00022829			
Name of Employer Occupation			
Receipt For: Primary General Other (specify) ▼		Aggregate Year-to-Date ▼ 25000.00	
		Transaction ID: 5A11C4138	

B.

C.

SUBTOTAL of Receipts This Page (optional)	25000.00
<b>TOTAL</b> This Period (last page this line number only)	<b>25000.00</b>

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

Use separate schedule(s)  
or each category of the  
Detailed Summary Page

FOR LINE NUMBER:		PAGE 7 / 81	
(check only one)			
<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input checked="" type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 15	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 17

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NAME OF COMMITTEE (in Full)  
Victory 2002

Full Name (Last, First, Middle Initial) A. Anderson Federation of Teachers		Date of Receipt M / D / Y Y Y Y 10 / 02 / 2002	
Mailing Address 555 New Jersey Avenue NW		Amount of Each Receipt this Period 5000.00	
City Washington	State DC	Zip Code 20001	
FEC ID number of contributing federal political committee C70002472			
Name of Employer		Occupation	
Receipt For: Primary      General Other (specify) ▼		Aggregate Year-to-Date ▼ 5000.00	
		Transaction ID: SA11C.4957	

Full Name (Last, First, Middle Initial) B. Congressman Bart Gordon Committee		Date of Receipt M / D / Y Y Y Y 10 / 03 / 2002	
Mailing Address P.O. Box 2008		Amount of Each Receipt this Period 10000.00	
City Murfreesboro	State TN	Zip Code 37133-2008	
FEC ID number of contributing federal political committee C00198915			
Name of Employer		Occupation	
Receipt For: Primary      General Other (specify) ▼		Aggregate Year-to-Date ▼ 20000.00	
		Transaction ID: SA11C.4960	

Full Name (Last, First, Middle Initial) C. Congressman Bart Gordon Committee		Date of Receipt M / D / Y Y Y Y 10 / 08 / 2002	
Mailing Address P.O. Box 2008		Amount of Each Receipt this Period 5000.00	
City Murfreesboro	State TN	Zip Code 37133-2008	
FEC ID number of contributing federal political committee C00198915			
Name of Employer		Occupation	
Receipt For: Primary      General Other (specify) ▼		Aggregate Year-to-Date ▼ 25000.00	
		Transaction ID: SA11C.4968	

SUBTOTAL of Receipts This Page (optional) .....	20000.00
TOTAL This Period (last page this line number only) .....	

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

Use separate schedule(s) or each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)		PAGE 19 / 143	
	<input type="checkbox"/> 11a 13	<input type="checkbox"/> 11b 14	<input checked="" type="checkbox"/> 11c 15	<input type="checkbox"/> 12 16

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NAME OF COMMITTEE (in F46)  
Victory 2002

Full Name (Last, First, Middle Initial) A. American Health Care Association		Date of Receipt M / D / Y Y Y Y 09 / 27 / 2002
Mailing Address 1201 L Street N.W.		Amount of Each Receipt this Period 5000.00
City Washington	State DC	
Zip Code 20005		contribution
FEC ID number of contributing federal political committee. C00008080		
Name of Employer	Occupation	Transaction ID: SA11C.4910
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 5000.00	

Full Name (Last, First, Middle Initial) B. Committee to re-elect Harold Ford Jr		Date of Receipt M / D / Y Y Y Y 08 / 28 / 2002
Mailing Address 5120 Barry Road		Amount of Each Receipt this Period 20000.00
City Memphis	State TN	
Zip Code 38117		contribution
FEC ID number of contributing federal political committee. C00316141		
Name of Employer	Occupation	Transaction ID: SA11C.4800
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 20000.00	

Full Name (Last, First, Middle Initial) C. Congressman Bart Gordon Committee		Date of Receipt M / D / Y Y Y Y 07 / 17 / 2002
Mailing Address P.O. Box 2008		Amount of Each Receipt this Period 10000.00
City Myrtleboro	State TN	
Zip Code 37133-2008		Transaction ID: SA11C.4200
FEC ID number of contributing federal political committee. C00196815		
Name of Employer	Occupation	
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 10000.00	

SUBTOTAL of Receipts This Page (optional) .....	▶	35000.00
TOTAL This Period (last page this form number only) .....	▶	



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