

# Retail Leaders PAC

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March 9, 2007

Mr. Corbin T. Jones  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Elections Commission  
Washington, DC 20463

Identification Number: C00112763

Reference: FEC Letters Dated 2/9/07 on 12-Day Pre-General Report (10/1/06 – 10/18/06), 30-Day Post-General Report (10/19/06 – 11/27/06), and Year End Report (11/28/06 – 12/31/06)

Dear Mr. Jones:

This letter is in response to the recent FEC inquiries regarding the Retail Industry Leaders Association Political Action Committee AKA Retail Leaders PAC. The FEC Requests for Additional Information (RFAs) inquired about negative cash balance reports for the Pre-General and Post-General Reports. After careful review of Retail Leaders PAC transactions dating back to January 2005, we have identified a handful of reporting errors that have been corrected in the attached amended FEC Reports. In correcting those errors, the amended reports correctly indicate that the Retail Leaders PAC has continually maintained a positive cash balance.

As a result of the two RFAs, the Retail Leaders PAC unilaterally undertook a review of PAC records going back to January 1, 2005, and uncovered some items that are reflected on the respective amended reports, which have been submitted electronically.

Those items that have been included as receipts in amended reports include:

**Personal payroll deduction of \$1,000 by Sandy Kennedy on January 13, 2005.** This deduction was in addition to the employee's regular payroll deduction and was not included on the Retail Leaders PAC 2005 Mid-Year Report as originally filed. The report has been amended to reflect the contribution.

**Personal payroll deductions for Paul T. Kelly from March 2005 – June 2005 were originally reported as a \$50 per-pay-period receipt.** In fact, the individual made a \$60 per-pay-period contribution during those months. The 2005 Mid-Year Report has been amended to reflect the \$60 per-pay-period contributions from March 2005 – June 2005.

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**RETAIL LEADERS POLITICAL ACTION COMMITTEE**

1700 N. Moore Street, Suite 2250, Arlington, VA 22209

Phone: 703-841-2300 Fax: 703-841-1184

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**PAC to PAC Contribution of \$5,000 by the Gillette Company Federal Political Action Committee on August 5, 2005.** The PAC to PAC contribution was inadvertently not reported on the 2005 Year End Report. The Year end report has been amended to reflect the contribution.

**Personal payroll deduction of \$1,000 by Sandy Kennedy on February 17, 2006.** This deduction was in addition to the employee's regular payroll deduction and was not included on the Retail Leaders PAC 2006 April Quarterly Report as originally filed. The report has been amended to reflect the contribution.

**Refund of \$1,000 contribution from Friends of Mark Foley on October 24, 2006.** The refund has been disclosed as a receipt on the amended 30-Day Post-General FEC Report covering October 19, 2006, through November 27, 2006.

**Misstatement of payroll deductions from October 19, 2006 – December 31, 2006.** All staff payroll deductions were mistakenly reported as disbursements when they were in fact receipts. The 30-Day Post General report and the 2006 Year End report have both been amended with the contributions correctly disclosed as receipts to the PAC.

In the review of our reports, we also discovered two previously unreported disbursements. Those disbursements include:

**Payment to Bank of America in the amount of \$105 on July 6, 2006 for the printing of PAC checks.** The disbursement has been disclosed on the amended October Quarterly 2006 report.

**Primary contribution of \$1,000 to Friends of Max Baucus PAC on December 6, 2006.** The disbursement has been disclosed on the amended 2006 Year-End report.

The amended reports have been filed electronically. In accordance with FEC reporting requirements, the following amended reports have been respectfully submitted:

- July 2005 Mid-Year Report
- 2005 Year-End Report
- April 2006 Quarterly Report
- July 2006 Quarterly Report
- October 2006 Quarterly Report
- 12-Day Pre-General Report
- 30-Day Post-General Report
- 2006 Year-End Report

We regret the reporting errors, and have implemented systems to ensure that similar mistakes do not occur in the future. Please do not hesitate to contact me with any follow up questions or concerns.

Sincerely,



Lori L. Denham

Treasurer

Retail Industry Leaders Association Political Action Committee

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**Federal Election Commission**  
**ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS**  
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