



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 11, 2007

Steven J. Durham, Treasurer
Tancredo for a Secure America
501 Church Street, Suite 212
Vienna, VA 22180

Response Due Date:
October 12, 2007

Identification Number: C00431619

Reference: Amended July Quarterly Report (4/1/07 – 6/30/07), received 8/15/07

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. Your report contains incorrect Column B figures for Lines 18 and 22 of the Summary and Detailed Summary Page information. When aggregating and reporting receipts and disbursements, candidate committees are required to disclose their activity on an election-cycle basis, from 11/3/04 to 11/4/08. Please amend your report to show election cycle-to-date figures for all aggregate amounts. (2 U.S.C. § 434(b))
2. 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

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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.

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>
Beers, Gregory D. Mr.	5/16/07	\$2,300.00	\$2,300.00	\$2,800.00
Boyce, Fumie Ms.	6/14/07	\$500.00	\$750.00	\$1,000.00
Brenholt, Donald	6/7/07	\$100.00	\$875.00	\$1,200.00
Bridges, L.	6/11/07	\$300.00	\$550.00	\$800.00
Brooks, William Eugene	6/21/07	\$100.00	\$300.00	\$400.00
Bushell, Michael S. Mr.	5/24/07	\$250.00	\$250.00	\$750.00
Busse, Ronald	6/29/07	\$50.00	\$250.00	\$1,175.00
Campbell, Greg	6/6/07	\$150.00	\$400.00	\$900.00
Cole, Jeanette	5/24/07	\$1800.00	\$2300.00	\$2,800.00
Freeman, John A. Dr.	5/7/07	\$800.00	\$800.00	\$2,300.00
Ghandi, Khushro Mr.	6/29/07	\$1,000.00	\$1,000.00	\$2,000.00
Krafka, Quentin E. Dr.	6/25/07	\$250.00	\$350.00	\$3825.00
Morris, Mark	6/29/07	\$500.00	\$500.00	\$1,500.00
Patterson, Rushton	6/6/07	\$1,300.00	\$2,300.00	\$2,800.00
Pearson, Opal	5/29/07	\$1,300.00	\$2,300.00	\$2,700.00
Powell, Fitzhugh K. Mr.	5/23/07	\$500.00	\$500.00	\$1,000.00
Powell, Mark	6/13/07	\$200.00	\$450.00	\$1,230.00
Quick, Barbara	6/18/07	\$50.00	\$250.00	\$550.00
Selman, Donald R. Mr.	4/23/07	\$500.00	\$500.00	\$1,250.00
Slifer, Gordon E. Mr.	5/23/07	\$250.00	\$250.00	\$750.00
Smith, Richard	4/12/07	\$100.00	\$300.00	\$400.00
Turner, Kelly J. Dr. M.D.	6/6/07	\$500.00	\$500.00	\$1,000.00
Weiss, E. J. Mr.	6/13/07	\$50.00	\$650.00	\$2,450.00
Wiggin, Laird E. Mr.	6/8/07	\$250.00	\$250.00	\$750.00
Zelis, John J. Dr.	6/5/07	\$250.00	\$500.00	\$750.00

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

3. Your report discloses \$1,010,080.55 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 Amended July Quarterly Report, received 8/15/07, discloses a substantial increase in the amount of debts from those disclosed on your original report. Please amend your report to clarify why this additional activity was not provided with your original filing. (11 CFR § 104.3)

5. Commission Regulations define the term "purpose" to mean a brief statement or description of why a disbursement was made. Examples are "dinner expense," "media," "salary," "polling," "travel," "party fees," "phone banks," "travel expenses," "travel expense reimbursement," and "catering costs." Examples of election day and voter registration activity include "exit polling," "door-to-door get out the vote," "get out the vote phone calls," and "driving voters to the polls." Unacceptable descriptions, which require additional clarification, include but are not limited to "advance," "consulting," "political consulting," "commission," "contract labor," "retainer," "election day expense," "expenses," "invoice," "support," "expense reimbursement," "miscellaneous," "professional services," "get-out-the-vote," "voter registration," "apr", "books", "consulting", "event cost", "fundraising-event", "event expense", "event", "promotional material" and "Team Tancredo". (11 CFR § 104.3(b)(4)(A))

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/notice_2006-23.pdf. Please amend Schedule B-P of your report to correct the descriptions that do not meet the requirements of the Regulations.

6. 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

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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)

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) 694-1168.

Sincerely,



Michelle Lee Grant
Senior Campaign Finance Analyst
Reports Analysis Division



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