



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

August 24, 2017

MR. JACK W. DALY, ESQ., TREASURER  
SHERIFF DAVID CLARKE FOR U.S. SENATE  
(OFFICIAL DRAFT CAMPAIGN)  
P.O. BOX 4749  
PINEHURST, NC 28374

**Response Due Date**  
**09/28/2017**

IDENTIFICATION NUMBER: C00631382

REFERENCE: MID-YEAR REPORT (01/01/2017 - 06/30/2017)

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 enforcement action.** Additional information is needed for the following 4 item(s):

1. Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$974,164.94 in "Individual contributions (itemized)." The sum of the entries itemized on Schedule A, however, indicates the total to be \$355,225. Please amend your report to clarify the discrepancy. (52 U.S.C. §30104(b) (formerly 2 U.S.C. § 434(b)) and 11 CFR §104.3))
2. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the follow description(s): "Back-End Cost" and "Mailhouse/Laser." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at <https://www.fec.gov/help-candidates-and-committees/purposes-disbursement>

3. Schedule B discloses reimbursements to individuals for "Reimbursent for transportation to and from Presidential Inauguration" and "Reimbursent for transportation to and from Presidential Inauguration balls." When the reimbursement amount to individuals for travel and subsistence advances exceeds \$500, the payments by individuals to any one vendor that make up the reimbursement may have to be itemized. For example, if the related payments to

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any one vendor aggregate in excess of \$200 for the calendar year, the individual advance payment to the vendor must also be itemized in a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and detailed purpose of the advance. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must indicate so in an amendment to this report. Please amend your report to include the missing or clarifying information. See Advisory Opinion 1996-20 for additional clarification. (11 CFR § 104.9)

4. Schedule B of your report discloses reimbursements to individuals for "ACU Conservative Political Action Conference Reception Fee," "Reimbursement for CPAC sponsorship," and "Reimbursement for Inauguration Ball tickets." Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information and clearly identify on the Schedule B, which reimbursement each memo entry relates to. If itemization is not necessary, you must indicate so in an amendment to this report. 11 CFR §§104.3(b)(3)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3

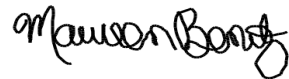
**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions 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. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. 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) 694-1147.

SHERIFF DAVID CLARKE FOR U.S. SENATE (OFFICIAL DRAFT CAMPAIGN)

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Sincerely,

A handwritten signature in black ink that reads "Maureen Benitz". The signature is written in a cursive, flowing style.

Maureen Benitz  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division

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