

**REPORTS ANALYSIS REFERRAL TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE**

**DATE: January 15, 2010**

**ANALYST: Corbin T. Jones**

**I. COMMITTEE: Republican National Committee C00003418**

**Randall Pullen, Treasurer (2/2/09 – Present) Timothy  
Morgan, Treasurer (3/1/07 – 2/1/09) 310 First Street, SE  
Washington, DC 20003**

**TYPE OF COMMITTEE: Party**

**II. REGISTRATION: September 19, 1975**

**III. BACKGROUND:**

**The Committee was sent fifteen (15) Requests for Additional Information (RFAs) which included reporting errors involving excessive, prohibited and other impermissible contributions or transfers, mathematical discrepancies, failure to provide supporting schedules, independent expenditure reporting problems and coordinated party expenditure reporting problems.**

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VIOLATION DESCRIPTION	REPORT(S)	DETAILS OF VIOLATION
Prohibited Contributions and Other Impermissible Contributions and Transfers	Amended 2008 M6, received 8/1/08	Schedule A of the Committee's report disclosed the apparent receipt of excessive contributions totaling \$63,950.00. These contributions were received from eighteen (18) individuals.
Prohibited Contributions and Other Impermissible Contributions and Transfers	Amended 2008 M10, received 11/25/08	Schedule A of the Committee's report disclosed the apparent receipt of excessive and prohibited contributions totaling \$309,170.00. These contributions were received from thirty-three (33) individuals, one (1) multicandidate political committee and six (6) apparent corporations.
Prohibited Contributions and Other Impermissible Contributions and Transfers	Amended 2008 12G, received 11/25/08	Schedule A of the Committee's report disclosed the receipt of apparent excessive and prohibited contributions totaling \$98,750.00. These contributions were received from ten (10) individuals, one (1) multicandidate political committee and four (4) apparent corporations.
Prohibited Contributions and Other Impermissible Contributions and Transfers	Amended 2008 12G, received 1/19/09	Schedule A of the Committee's report disclosed the receipt of an apparent excessive contribution totaling \$15,000.00. This contribution was received from one (1) multicandidate political committee.
Prohibited Contributions and Other Impermissible Contributions and Transfers	Amended 2008 12G, received 6/1/09	Schedule A of the Committee's report disclosed the receipt of excessive contributions totaling \$47,750.00. These contributions were received from six (6) individuals and one (1) multicandidate committee.
Prohibited Contributions and Other Impermissible Contributions and Transfers	Amended 2008 30G, received 1/22/09	Schedule A of the Committee's report disclosed the receipt of excessive and prohibited contributions totaling \$68,550.00. These contributions were received from nine (9) individuals, one (1) multicandidate political committee and three (3) corporations.
Mathematical Discrepancies	Amended 2008 M6, received 8/1/08	The Committee's aggregate year-to-date totals do not appear to accurately reflect the contributions received during the calendar year for four (4) individuals, creating a discrepancy of \$85,000.00.
Mathematical Discrepancies	Amended 2008 30G, received 1/22/09	The Committee's aggregate year-to-date totals do not appear to accurately reflect the contributions received during the calendar year for nine (9) individuals and one (1) multicandidate committee, creating a discrepancy of \$133,360.00.
Failure to Provide Supporting Schedules	2008 M5	Schedule B of the Committee's report disclosed voids of four (4) contributions totaling -\$36,949.07. However, the Committee failed to disclose having made these contributions on prior disbursement schedules.
Failure to Provide Supporting Schedules	2008 M9	Schedule B of the Committee's report disclosed voids of disbursements to seven (7) vendors totaling -\$4,951.76. However, the Committee failed to disclose having made these disbursements on prior disbursement schedules.

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Independent Expenditure Reporting Problems	2008 M9	The Committee failed to clarify \$2,295,989.72 in independent expenditures. There were amount and date of public dissemination discrepancies between the 48 Hour Notice entries and the entries disclosed on Schedule E of the Committee's report.
Coordinated Expenditure Reporting Problems	2008 M4	Schedule F of the Committee's report disclosed coordinated expenditures for one (1) federal candidate totaling \$31,474.73. These coordinated expenditures were dated after the special general election for the candidate.

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REPORTS ANALYSIS REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: January 15, 2010

ANALYST: Corbin Jones

- I. COMMITTEE: Republican National Committee  
C00003418  
Randall Pullen, Treasurer (02/02/09 - Present)  
Timothy J. Morgan, Treasurer (03/01/07 - 02/01/09)  
310 First Street, SE  
Washington, DC 20003
- II. RELEVANT STATUTE: 2 U.S.C. §441a(a)  
2 U.S.C. §441b(a)  
11 C.F.R. §110.1(c)  
11 C.F.R. §110.2(c)  
11 C.F.R. §103.3(b)(1)  
11 C.F.R. §110.1(k)(3), and (2)  
11 C.F.R. §114.2(a)

III. BACKGROUND:

**Excessive Contributions from Individuals, Political Committees and Prohibited Receipts from Corporations**

The Republican National Committee (“the Committee”) received excessive contributions from thirty-four (34) individuals and three (3) multicandidate political committees that were not refunded, reattributed or transferred out within sixty (60) days of the date of receipt. Further, the Committee received prohibited receipts from twelve (12) corporations which were not refunded or transferred out within thirty (30) days of the date of receipt. The excessive and prohibited contributions not refunded, reattributed or transferred to a non-federal account within the applicable timeframes total \$309,540.00 as disclosed on the 2008 June Monthly, October Monthly, 12 Day Pre-General and 30 Day Post-General Reports (Attachment 2)<sup>1</sup>.

<sup>1</sup> A listing of these contributions by the individual/committee/entity name rather than by the reporting period is provided in Attachment 3.

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## **2008 June Monthly Report**

On August 1, 2008, the Committee filed an Amended 2008 June Monthly Report covering the period from May 1, 2008 through May 31, 2008. The report disclosed excessive contributions from eighteen (18) individuals totaling \$63,950.00 (Images 28991655322-28991664293). A subsequent amendment to the 2008 June Monthly Report, received August 12, 2008, also disclosed the same issues (Image 28932424342).

On August 6, 2008, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2008 June Monthly Report, received August 1, 2008. Among other matters, the RFAI sought clarification regarding contributions received from individuals that appeared to be in excess of the \$28,500.00 per calendar year limit and informed the Committee that it might need to refund the excessive amount. The RFAI further stated that the Committee could retain the funds if the conditions for reattribution were met within sixty (60) days of the date of receipt (Image 28039810833).

On August 12, 2008, the Committee filed a Amended 2008 June Monthly Report which included copies of refund checks disbursed by the Committee. The refund checks were for refunds of excessive contributions received from seven (7) of the individuals. The refund checks were disbursed to the Joint Fundraising Representatives that originally collected the contributions (Images 28039812281-28039812286).

On August 13, 2008, the Committee filed a Miscellaneous Electronic Submission ("FEC Form 99") in response to the RFAI referencing the Amended 2008 June Monthly Report, received August 1, 2008, which stated in part, "Regarding contributions which appear to exceed the Federal limits, we have refunded all of those funds... We have mailed a photocopy of each of the refund checks to the FEC for each item where the refund memo had not previously been included in our report" (Image 28932436342).

On August 20, 2008, the Committee filed a 2008 August Monthly Report covering the period from July 1, 2008 through July 31, 2008. The report disclosed transfers to McCain Victory 2008 and McCain Victory Committee, Joint Fundraising Representatives for the Committee (Images 28991904282-28991904283). The transfers contained refunds of excessive contributions from three (3) individuals.<sup>2</sup>

On September 4, 2008, Gordon Schoepfle, an accountant for the Committee, called to inquire whether there were any outstanding issues for the Committee. The Reports Analysis Division (RAD) Analyst told Mr. Schoepfle that the responses received regarding excessive contributions and prohibited receipts disclosed on the 2008 June Monthly Report were inadequate. The Analyst stated that the Commission had not received copies of refund checks or

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<sup>2</sup> Copies of refund checks received on August 12, 2008 indicate which transfer contains specific refunds for excessive contributions.

any additional clarification for several apparent excessive contributions. Mr. Schoepfle said he would look into the matter (Attachment 4).

On September 5, 2008, the Analyst called Mr. Schoepfle to give him the names of the eleven (11) contributors for whom copies of refund checks were missing and for whom there was no clarification that the contributions were not excessive (Attachment 4).

On September 8, 2008, the Committee filed an Amended 2008 June Monthly Report. The amended report indicated that each of the fifteen (15) excessive contributions from individuals for which refunds had not been reported were refunded in August 2008 (Images 28992110615-28992117744).

On September 19, 2008, the Committee filed a 2008 September Monthly Report covering the period from August 1, 2008 through August 31, 2008. The report contained transfers to McCain Victory 2008, McCain Victory California and McCain Victory Committee, Joint Fundraising Representatives of the Committee (Images 28933156956-28933156958). Memo entries were included to show refunds of excessive contributions from fifteen (15) of the individuals listed in the RFAI (Images 28933156964-28933156969).

A total of \$1,000.00 in excessive contributions referenced in the RFAI were refunded or transferred outside the permissible timeframe (Attachment 2).

### **2008 October Monthly Report**

On November 25, 2008, the Committee filed an Amended 2008 October Monthly Report covering the period from September 1, 2008 through September 30, 2008. The report disclosed excessive contributions from thirty-three (33) individuals totaling \$309,170.00, excessive contributions from one (1) multicandidate PAC totaling \$15,000.00 and prohibited receipts from six (6) apparent corporations totaling \$2,500.00 (Image 28993150006). A subsequent amendment to the 2008 October Monthly Report, received December 12, 2008, also disclosed the same issues (Image 28994181280).

On December 17, 2008, an RFAI was sent to the Committee referencing the Amended 2008 October Monthly Report, received November 25, 2008. Among other matters, the RFAI sought clarification regarding contributions received from individuals that appeared to be in excess of the \$28,500.00 per calendar year limit for individuals, a contribution received from a multicandidate political committee that appeared to be in excess of the \$15,000.00 per calendar year limit, and prohibited receipts from apparent corporations. The RFAI informed the Committee that it might have to refund any excessive contributions or prohibited receipts. The RFAI further stated that the excessive portion of contributions received from individuals could be retained if the conditions for reattribution were met within sixty (60) days of the date of receipt and that the prohibited receipts from corporations could be retained if they were transferred to a non-federal account within thirty (30) days of the date of receipt (Image 28039960827-28039960838).

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On January 16, 2009, the Committee filed an Amended 2008 October Monthly Report. The amended report included a Memo entry with partnership information as clarification for one (1) apparent corporate receipt (Image 29930139102). In addition, the amended report indicated that each of the thirty-three (33) excessive contributions from individuals and the excessive contribution from a multicandidate political committee were refunded in January or October 2008 (Images 29930061911-29930139118)

On January 20, 2009, the Committee filed an FEC Form 99 referencing the Amended 2008 October Monthly Report, received November 25, 2008, which stated in part,

“Contributions from individuals as a part of corporations are refunded unless appropriate partner documentation is received. We have refunded any contributions for which complete information is not made available for our report within the appropriate time allowance. We have made corrections and refunded contributions where necessary to make sure that all contributions are proper. When appropriate, a copy of the refund check has been mailed to FEC” (Image 29931953491).

On January 26, 2009, Mr. Schoepfle called the Analyst in response to a voice mail message left earlier in the day. The Analyst informed Mr. Schoepfle that further clarification was needed regarding excessive contributions and prohibited receipts disclosed on the Amended 2008 October Monthly and 12 Day Pre-General Reports. The Analyst stated that copies of any refund checks issued should be sent to the Commission. Mr. Schoepfle indicated that many of the refunds were included in transfers to the Joint Fundraising Representatives that originally collected the contributions. He also stated that copies of those refund checks had already been sent to the Commission and should arrive soon. The Analyst informed Mr. Schoepfle that the excessive contributions and prohibited receipts could be referred for further Commission action (Attachment 4).

On January 29, 2009, Mr. Schoepfle called to inform the Analyst that he was still gathering the data needed for the response to the RFAI on the 2008 October Monthly Report, among other reports, and would file it in the next few days (Attachment 4).

On January 30, 2009, the Committee filed a 2008 Year End Report covering the period from November 25, 2008 through December 31, 2008. The report included a partial refund of excessive contributions from one (1) individual (Image 29932107212).

On January 30, 2009, the Committee filed an Amended 2008 October Monthly Report. The amended report included copies of several refund checks for nineteen (19) individuals and a partial refund for one (1) individual that were sent on October 15, 2008 to McCain-Palin Victory 2008, which originally collected the contributions. Refunds for fourteen (14) individuals, including the remaining refunds for two (2) individuals, one (1) multicandidate political

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committee, and five (5) apparent corporations, were sent on January 12, 2009 (Images 29030013614-29030013635).<sup>3</sup>

On February 20, 2009, the Committee filed a 2009 February Monthly Report covering the period from January 1, 2009 through January 31, 2009. The report included refunds of excessive or prohibited contributions from fourteen (14) individuals, one (1) multicandidate political committee, and five (5) apparent corporations (Images 29932232053-29932232059, 29932232070).

A total of \$92,490.00 in excessive contributions and prohibited receipts referenced in the RFAI were refunded or transferred outside the permissible timeframes (Attachment 2).

### **2008 12 Day Pre-General Report**

On November 25, 2008, the Committee filed an Amended 2008 12 Day Pre-General Report covering the period from October 1, 2008 through October 15, 2008. The report disclosed excessive contributions from ten (10) individuals totaling \$98,750.00, excessive contributions from one (1) multicandidate political committee totaling \$15,000.00 and prohibited receipts from four (4) apparent corporations totaling \$20,650.00 (Image 28993240006).

On December 17, 2008, an RFAI was sent to the Committee referencing the Amended 2008 12 Day Pre-General Report, received November 25, 2008. Among other matters, the RFAI sought clarification regarding contributions received from individuals that appeared to be in excess of the \$28,500.00 per calendar year limit, a contribution from a multicandidate PAC that appeared to be in excess of the \$15,000.00 per calendar year limit and prohibited receipts from apparent corporations. The RFAI informed the Committee that it might have to refund any excessive contributions or prohibited receipts. The RFAI further stated that the excessive portion of the contributions received from individuals could be retained if the conditions for reattribution were met within sixty (60) days of the date of receipt and the prohibited receipts could be retained if they were transferred to a non-federal account within thirty (30) days of the date of receipt (Image 28039960840-28039960848).

On January 19, 2009, the Committee filed an Amended 12 Day Pre-General Report. The report disclosed an excessive contribution from one (1) multicandidate political committee totaling \$10,000.00. In addition, the amended report indicated that each of the excessive contributions and prohibited receipts questioned in the RFAI dated December 17, 2008 had been refunded on October 18, 2008 or January 15, 2009 (Images 29990272037-29990320166). Refunds of excessive contributions from three (3) contributors were disclosed on the 2008 30 Day Post-General Report covering the period from October 16, 2008 through November 24, 2008 and filed by the Committee on December 4, 2008 (Images 28934894875, 28934894876, 28934895077).<sup>4</sup>

<sup>3</sup> A transfer to McCain-Palin Victory 2008 dated October 15, 2008 for the amount on the refund check does appear on the 2008 12 Day Pre-General Report received October 23, 2008 (Image 28934137593).

<sup>4</sup> The Amended 2008 12 Day Pre-General Report, received January 19, 2009, indicates that the refunds of excessive contributions of Katherine Freyvogel and Mari Ann Martin were transferred out to McCain Palin Victory 2008 on

On January 20, 2009, the Committee filed an FEC Form 99 in response to the RFAI referencing the Amended 2008 12 Day Pre-General Report, received November 25, 2008 which stated in part, "We have made corrections and refunded contributions where necessary to make sure that all contributions are proper. When appropriate, a copy of the refund check has been mailed to FEC" (Image 29931953492).

On January 26, 2009, Mr. Schoepfle called the Analyst in response to a voice mail message left earlier in the day. The Analyst informed Mr. Schoepfle that further clarification was needed regarding the excessive contributions and prohibited receipts disclosed on the Amended 2008 October Monthly and 12 Day Pre-General Reports. The Analyst stated that copies of any refund checks issued should be sent to the Commission. Mr. Schoepfle indicated that many of the refunds were included in transfers to the Joint Fundraising Representatives that originally collected the contributions. He also stated that copies of those refund checks had already been sent to the Commission and should arrive soon. The Analyst informed Mr. Schoepfle that the excessive contributions and prohibited receipts could be referred for further Commission action (Attachment 4).

On January 29, 2009, Mr. Schoepfle called to inform the Analyst that he was still gathering the data needed for the response to the RFAI on the 12 Day Pre-General Report, among other reports, and would file it in the next few days (Attachment 4).

On January 30, 2009, the Committee filed Amended 2008 October Monthly and 12 Day Pre-General Reports. These filings included copies of refund checks issued by the committee for contributions from seven (7) individuals, one (1) PAC and four (4) apparent corporations. The checks were dated January 9, 12 or 15, 2009 (Images 29030013623, 29030013600-29030013610).

On February 11, 2009, an RFAI was sent to the Committee referencing the Amended 2008 12 Day Pre-General Report, received January 19, 2008. The RFAI sought clarification regarding a contribution received from one (1) multicandidate political committee that appeared to be in excess of the \$15,000.00 per calendar year limit. The RFAI informed the Committee that it would have to refund any excessive contribution(s) from a multicandidate political committee (Image 29030024555).<sup>5</sup>

On February 20, 2009, the Committee filed a 2009 February Monthly Report covering the period from January 1, 2009 through January 31, 2009. The report included refunds of excessive contributions from seven (7) individuals and two (2) multicandidate political committees, and refunds of prohibited receipts from four (4) apparent corporations (Images 29932232055, 29932232059-29932232062, 29932232070).

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January 15, 2009 (Images 29990295369, 29990304604). However, it appears that these refunds actually were transferred to McCain Palin Victory 2008 on October 18, 2008. These transfers appear on the 30 Day Post-General Report, received December 4, 2008.

<sup>5</sup> This contribution appeared on the previously filed 2008 12 Day Pre-General Reports, but was overlooked for questioning at the time those reports were reviewed.

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On February 24, 2009, the Committee filed two (2) Amended 2008 12 Day Pre-General Reports. The reports contained no additional updates or clarifications regarding excessive contributions or prohibited receipts (Images 29932261784 and 29991070001).

On February 24, 2009, the Committee also filed an FEC Form 99 in response to the RFAI referencing the Amended 2008 12 Day Pre-General Report, received January 19, 2008. The RFAI stated in part, "Regarding contributions disclosed on Schedule A in excess of limits, we have researched the item in question and amended our report to reflect accurate information. A refund check has been sent to the donor and a photocopy has been sent to FEC" (Image 29932311717).

On February 25, 2009, the Committee filed an Amended 2008 12 Day Pre-General Report that included a copy of a refund check, dated February 12, 2009, for an excessive contribution from one (1) multicandidate political committee (Images 29030041386-29030041387).

On March 20, 2009, the Committee filed a 2009 March Monthly Report covering the period from February 1, 2009 through February 28, 2009. The report included a \$25,000.00 refund of excessive contributions from one (1) multicandidate committee (Image 29933381961).

On June 1, 2009, the Committee filed an Amended 2008 12 Day Pre-General Report. The report disclosed additional excessive contributions from six (6) individuals totaling \$37,750.00 and one (1) multicandidate political committee totaling \$10,000.00 (Images 29933934982-29933983096).

On June 3, 2009, an RFAI was sent to the Committee referencing the Amended 2008 12 Day Pre-General Report, received June 1, 2009. The RFAI sought clarification regarding contributions received from individuals that appeared to be in excess of the \$28,500.00 per calendar year limit and a contribution from a multicandidate political committee that appeared to be in excess of the \$15,000.00 per calendar year limit. The RFAI informed the Committee that it might have to refund any excessive contributions. The RFAI further stated that the excessive portion of contributions received from individuals could be retained if the conditions for reattribution were met within 60 days of the date of their receipt (Images 29030094681-29030094684).

On June 19, 2009, the Committee filed a 2009 June Monthly Report covering the period from May 1, 2009 through May 31, 2009. The report disclosed refunds of excessive contributions from four (4) individuals (Images 29992262711, 29992262713, 29992262714, 29992262715).

On June 30, 2009, the Committee filed an Amended 2008 12 Day Pre-General Report that included copies of refund checks for contributions from six (6) individuals and one (1) political committee (Images 29030104545-29030104552).

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On July 1, 2009, the Committee filed an Amended 2008 12 Day Pre-General Report which disclosed that each of the excessive contributions and prohibited receipts questioned in the RFAI dated June 3, 2009 were refunded on May 6 or June 8, 2009 (Images 29933934982-29933977072).

On July 20, 2009, the Committee filed a 2009 July Monthly Report covering the period from June 1 through June 30, 2009. The report disclosed refunds of excessive contributions from two (2) individuals and a multicandidate political committee (Images 29992484227, 29992484228, 29992484232).

A total of \$148,150.00 in excessive contributions and prohibited receipts referenced in the RFAIs were refunded or transferred outside the permissible timeframes (Attachment 2).

### **2008 30 Day Post-General Report**

On January 22, 2009, the Committee filed an Amended 2008 30 Day Post-General Report covering the period from October 16, 2008 through November 24, 2008. The report disclosed excessive contributions from nine (9) individuals totaling \$42,800.00, an excessive contribution from one (1) multicandidate political committee totaling \$15,000.00, and prohibited receipts from four (4) apparent corporations totaling \$10,750.00 (Image 29990336344).

On March 4, 2009, an RFAI was sent to the Committee referencing the Amended 2008 30 Day Post-General Report, received January 22, 2009. Among other matters, the RFAI sought clarification regarding contributions received from individuals that appeared to be in excess of the \$28,500.00 per calendar year limit, one (1) multicandidate political committee that appeared to be in excess of the \$15,000.00 per calendar year limit, and four (4) prohibited receipts from apparent corporations. The RFAI informed the Committee that it might have to refund any excessive contributions or prohibited receipts. The RFAI further stated that the excessive portion of the contributions received from individuals could be retained if the conditions for reattribution were met within sixty (60) days of the date of receipt, and that the prohibited receipts from corporations could be retained if transferred to a non-federal account within thirty (30) days from the date of receipt (Images 29030044124-29030044133).<sup>6</sup>

On March 20, 2009, the Committee filed a 2009 March Monthly Report covering the period from February 1, 2009 through February 28, 2009. The report included a \$15,000.00 refund of an excessive contribution from one (1) multicandidate political committee dated February 12, 2009 (Image 29933381961).

On March 26, 2009, Mr. Schoepfle called to inform the Analyst that he was finishing revisions of the 2008 30 Day Post-General Report in response to the RFAI. Among other issues discussed, the Analyst informed Mr. Schoepfle that many refunds for excessive and prohibited

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<sup>6</sup> A contribution from one individual contributor, King Wah Chui, should not have been included as excessive. A prior refund of \$500 was mistakenly not included in the calculations for this report (Image 29030013614). In addition, two individual contributors, Stephen L. Way and Oliver T. Carr, Jr., have partial refunds which appear on the 2008 Year End Report (Images 29932107209, 29932107214).

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contributions received for the 2007-2008 election cycle seemed to have occurred outside permissible timeframes. Mr. Schoepfle said that many of these funds had been received through joint fundraising efforts and it often took longer to discover that the contributions were excessive and refund them. Mr. Schoepfle indicated he was not sure how the Committee could speed up the process. The Analyst informed Mr. Schoepfle that this issue could be referred for further Commission action (Attachment 4).

On March 27, 2009, the Committee filed an FEC Form 99 in response to the RFAI referencing the Amended 2008 30 Day Post-General Report, received January 22, 2009. The RFAI stated in part,

“Regarding contributions disclosed on Schedule A in excess of limits, we have researched the items in question and amended our report to reflect accurate information. A refund check has been sent to the donor and a photocopy has been sent to FEC for all cases where the contributions have been determined to be in excess of limits. Contributions received from corporations that have not been attributed to partners have been refunded and the report has been annotated to reflect same. Photocopies of the refunds have been sent to FEC. In the case of partnerships contributions, the partner share has been reported in a memo Schedule A to reflect the individual share. Regarding contributions received from PACs disclosed on Schedule A in excess of limits, we have researched the items in question and amended our report to reflect accurate information. A refund check has been sent to the donors and a photocopy has been sent to FEC for all cases where the contributions have been determined to be in excess of limits” (Image 29991868284).

On March 27, 2009, the Committee filed an Amended 2008 30 Day Post-General Report. The report included a Memo entry with partnership information as clarification for one (1) apparent corporate receipt (Image 29991846136). In addition, the amended report indicated that each of the excessive contributions and prohibited receipts questioned in the RFAI dated March 4, 2009, were refunded on March 6, 2009 (Images 29991796073-29991864333).

On April 6, 2009, the Committee filed an Amended 2008 30 Day Post-General Report which included copies of refund checks issued for excessive contributions from eight (8) individuals and prohibited receipts from three (3) apparent corporations (Images 29030064487-29030064497).

On April 20, 2009 the Committee filed a 2009 April Monthly Report covering the period from March 1, 2009 through March 31, 2009. The report disclosed refunds of excessive contributions from eight (8) individuals and refunds of prohibited receipts from three (3) apparent corporations (Images 29992009354-29992009357).

A total of \$67,900.00 in excessive contributions and prohibited receipts referenced in the RFAI were refunded or transferred outside the permissible timeframes (Attachment 2).

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To date, no further communication has been received from the Committee regarding these matters.

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