

WALLER LANSDEN DORTCH & DAVIS, LLP

NASHVILLE CITY CENTER
511 UNION STREET, SUITE 2700
NASHVILLE, TENNESSEE 37219-8966
(615) 244-6380
FAX (615) 244-6804
www.wallerlaw.com

1901 SIXTH AVENUE NORTH, SUITE 1400
BIRMINGHAM, ALABAMA 35203-2623
(205) 214-6380

809 SOUTH MAIN STREET
COLUMBIA, TENNESSEE 38402-1035
(931) 388-6031

520 SOUTH GRAND AVENUE, SUITE 800
LOS ANGELES, CALIFORNIA 90071
(213) 362-3680

Joseph A. Woodruff
(615) 850-8485
joseph.woodruff@wallerlaw.com

September 5, 2006

VIA FACSIMILE
AND FIRST-CLASS MAIL

Mr. Jeff S. Jordan
Supervising Attorney
Complaints Examinations &
Legal Administration
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Re: MUR 5790

Dear Mr. Jordan:

This law firm has been engaged by the Bob Corker for Senate Campaign Committee (the "Campaign") and Kim Kaegi, its Treasurer, to respond to your letter dated August 15, 2006 and the Complaint filed with the Commission on August 8, 2006 by Robert D. Tuke, Chairman of the Tennessee Democratic Party. Please see the Statement of Designation of Counsel attached at Tab 1.

Your letter was received by Ms. Kaegi and the Campaign on Monday, August 21, 2006. A timely response is therefore due to be submitted not later than Tuesday, September 5, 2006. While we are able at this time to provide a preliminary response, we are hereby requesting a ten day extension of time within which to furnish a more comprehensive response. We are in the process of obtaining letters from the Campaign's primary opponents confirming that they received all required disclosures from the Campaign in a timely manner. We anticipate having letters from both of the opposing campaigns within the next ten days. Moreover, I was traveling on business last week and was unable to devote

FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

SEP 11 11 A 9:48

September 5, 2006

Page 2

adequate attention to this matter until after my return. The additional ten days will allow me sufficient time to complete a comprehensive response to your letter.

The Campaign is able to provide the following preliminary response:

The Complaint alleges that the Campaign "filed eight notices late and failed to file two notices" as required by 11 C.F.R. Sections 104.5(f) and 400.21(a). Attached to and filed with the Complaint was a document entitled "Late or Missed 48 Hour Notices For Bob Corker For Senate". That document listed 44 transactions, two loans made by the candidate to the Campaign and 42 contributions of \$1,000 or greater received by the Campaign. Our preliminary review reveals that at least three of the alleged "Late or Missed" notices set out in the document attached to the Complaint are without merit and should be dismissed.

I shall deal first with the alleged "late filed" 48 hour notices regarding receipt of contributions of \$1,000 or greater:

The Complaint does not identify the specific contributions it claims to have been reported late other than the conclusory allegation that these "late reported" contributions totaled "\$61,000". In this respect, the Complaint fails to comply with the requirements of 11 C.F.R. Sections 111.4(d)(3) and (4). The document attached to the complaint, however, does identify certain specific contributions received by the Campaign on July 19 and 20, 2006, allegedly not reported until July 24, 2006. Contrary to the allegation in the Complaint, these contributions were all reported by the Campaign in a seven-page report on FEC Form 6 filed by facsimile transmission on Friday, July 21, 2006 at 7:25 p.m. The pdf images of these reports as maintained on the Commission's website, clearly show "July 21, 2006" as the date the report was first faxed. See Tab 2.

I shall now deal with the alleged "failure to file" notices regarding loans by the candidate:

Like the preceding allegation, this claim too is without merit.

Loans by the candidate first exceeded the reporting level of two-times the threshold amount on July 18, 2006. The Campaign filed by facsimile transmission FEC Form 10 reporting all loans at 10:44 p.m. on July 19, 2006. The pdf image of this report as maintained on the Commission's website clearly shows "07/19/2006" as the date and "22:44" as the time of the fax. The Secretary of the Senate stamped the report as received on July 20, 2006 at 7:21 a.m. The only administrative oversight with respect to the filing of this FEC Form 10 is that the

September 5, 2006

Page 3

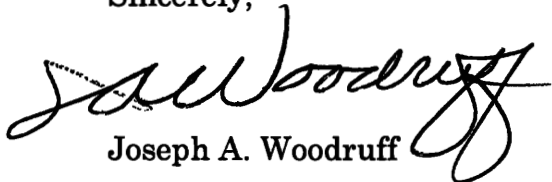
Treasurer did not place a check mark next to item 13 (a) of the form indicating that the filing was a substitute for FEC Form 6. See Tab 3.

On July 25, 2006, the candidate again made a loan to the Campaign triggering the 24 Hour reporting requirement. A report of the loan on FEC Form 10 was filed by facsimile transmission on July 26, 2006 at 9:38 p.m. On this occasion, the Treasurer did check item 13(a) of the form. See Tab 4.

These documents demonstrate that the Campaign timely reported the loans that in the aggregate exceeded the threshold amount. The only deficiency in these filings is the failure to check item 13(a) in the report filed on July 19. The Campaign reported the transactions timely and completely.

Please consider the foregoing preliminary response and grant the requested ten day extension of time within which to respond more fully.

Sincerely,



Joseph A. Woodruff

JAW/

cc: Ms. Kim Kaegi
Mr. Ben Mitchell

27044161419

TAB 1



FEDERAL ELECTION COMMISSION
Office of General Counsel
999 E Street, NW
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL
Please use one form for each Respondent/Witness
FAX (202) 219-3923

MUR: 5790

COUNSEL: Joseph A. Woodruff

FIRM: Waller Lansden Dortch & Davis, LLP

ADDRESS: 511 Union Street, Suite 2700, Nashville, TN 37219

TELEPHONE - OFFICE: (615) 244-6380

FAX: (615) 244-6804

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

9-5-6
Date

Kimberly Kaepf
Signature

Treasurer
Title

RESPONDENT/WITNESS NAME (PRINT): Kimberly Kaepf

MAILING ADDRESS: Bob Corker for Senate
518 Georgia Aven, 2nd Floor Chattanooga

TELEPHONE - HOME:

TN 37402

OFFICE: (423) 423-796-1994

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation

27044161421

TAB 2

07/21/2006 FRI 17:27 FAX

26020550004

001/007

SECRETARY OF THE SENATE
48 HOURS NOTICE OF CONTRIBUTIONS/LOANS RECEIVED
(See Reverse Side for Instructions)
JUL 24 AM 8:09

112

To be used to report all contributions (including loans) of \$1000 or more, received within 20 days of the election.

1. NAME OF COMMITTEE IN FULL

Bob Corker For Senate, Inc.

ADDRESS (number and street)

518 Georgia Ave, 2nd Floor

CITY, STATE, and ZIP CODE

Chattanooga

TN

37403

2. NAME OF CANDIDATE

Bob Corker

Any information copied from such Reports and Statements may not be 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.

4. FEC IDENTIFICATION NUMBER
C00407000

SIGNATURE(Optional)	DATE 07/21/2006	For further information contact: Federal Election Commission 400 E Street, NW, Washington, DC 20463 Toll Free 800-424-9530, Local 202-454-1100

FEC FORM 6
(Revised 1/2001)

27044161422

26020550004

07/21/2006 FRI 17:27 FAX

26020550005

002/007

SECRETARY OF THE SENATE

06 JUL 26 AM 8:09

FEC FORM 6 - 48 HOUR NOTICE OF CONTRIBUTIONS / LOANS

(continuation page)

Any information reported herein may not be copied for sale or use by any person for the purposes of soliciting contributions or for any other commercial purpose except that the name and address of any political committee may be used to solicit contributions from that committee.

Name of Individual, Organization, or Corporation

Full Name, Address, and ZIP Code Robert F. Decosimo Signal Mountain TN 37377-2869	Name of Employer Decosimo & Associates, Inc. Occupation CPA	Date (month, day, year) 07/20/2006	Amount Received this Period 1000.00
Full Name, Address, and ZIP Code Mitch Collins Germanstown TN 38138-3854	Name of Employer Equity Inns, Inc. Occupation Executive Vice President	Date (month, day, year) 07/20/2006	Amount Received this Period 1000.00
Full Name, Address, and ZIP Code Lewis Howard, Jr. Knoxville TN 37915-6211	Name of Employer Howard & Howard Occupation Attorney	Date (month, day, year) 07/20/2006	Amount Received this Period 1000.00
Full Name, Address, and ZIP Code Joe A. Hollingsworth, Jr. Canton TN 37716	Name of Employer Hollingsworth Companies Occupation CEO	Date (month, day, year) 07/20/2006	Amount Received this Period 1000.00
Full Name, Address, and ZIP Code Theresa Coker Chattanooga TN 37402-4418	Name of Employer Memorial Hospital Occupation Administrator	Date (month, day, year) 07/20/2006	Amount Received this Period 1000.00
Full Name, Address, and ZIP Code Sharon Thomas Knoxville TN 37922	Name of Employer N/A Occupation Homemaker	Date (month, day, year) 07/20/2006	Amount Received this Period 1500.00
Full Name, Address, and ZIP Code Zane Brown Lookout Mountain TN 37350-1255	Name of Employer N/A Occupation Homemaker	Date (month, day, year) 07/20/2006	Amount Received this Period 1200.00
Full Name, Address, and ZIP Code Robert F. Samples Knoxville TN 37932-3227	Name of Employer N/A Occupation retired	Date (month, day, year) 07/20/2006	Amount Received this Period 1500.00

TOTAL THIS PERIOD (last page only)

27044161423

15
14
13
12
11
10
9
8
7
6
5
4
3
2
1

07/21/2008 FRI 17:27 FAX

26020550006

003/007

SECRETARY OF THE SENATE

06 JUL 24 AM 8:13g

**48 HOURS NOTICE OF
CONTRIBUTIONS/LOANS RECEIVED**
(See Reverse Side for Instructions)

To be used to report all contributions (including loans) of \$1000 or more, received within 20 days of the election.

1. NAME OF COMMITTEE IN FULL

Bob Corker For Senate, Inc

ADDRESS (number and street)

818 Georgia Ave, 2nd Floor

CITY, STATE, and ZIP CODE

Chattanooga

TN

37403-

2. NAME OF CANDIDATE

Bob Corker

Any information contained hereon must be reported 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.

4. FEC IDENTIFICATION NUMBER
C00407650

27044161424

26020550006

SIGNATURE (Optional)		DATE 07/20/2008	For further information contact: Federal Election Commission 990 E Street, NW, Washington, DC 20463 Toll Free 800-424-9530, Local 202-694-1100

FEC FORM 6
(Revised 1/2001)

07/21/2006 FRI 17:27 FAX

26020550007

004/007

SECRETARY OF THE SENAT

212

06 JUL 24 AM 8:09

FEC FORM 6 - 48 HOUR NOTICE OF CONTRIBUTIONS / LOANS

(continuation page)

Any information reported herein may not be copied for sale or use by any person for the purpose of soliciting contributions or for any other commercial purpose except that the name and address of any political committee may be used to solicit contributions from that committee.

Name of Individual, Organization, or Corporation

Full Name, Address, and ZIP Code Laura Lea Crossler Chattanooga TN 37421-2444	Name of Employer N/A Occupation Homemaker	Date (month, day, year) 07/19/2006	Amount Received this Period 1000.00
Full Name, Address, and ZIP Code Adele Wallford Memphis TN 38111-2515	Name of Employer N/A Occupation Homemaker	Date (month, day, year) 07/19/2006	Amount Received this Period 1000.00
Full Name, Address, and ZIP Code J. Beasley Wellford Memphis TN 38111-2515	Name of Employer Garber Taylor Associates Occupation Executive	Date (month, day, year) 07/19/2006	Amount Received this Period 1000.00
Full Name, Address, and ZIP Code Virginia B. Lazzarby Nashville TN 37205-4505	Name of Employer Brotagne Occupation Oil & Gas Producer	Date (month, day, year) 07/19/2006	Amount Received this Period 1000.00
Full Name, Address, and ZIP Code William B Bowen Chattanooga TN 37421-1858	Name of Employer Alavian Brothers Occupation Executive Director	Date (month, day, year) 07/19/2006	Amount Received this Period 1000.00
Full Name, Address, and ZIP Code Mark A. Burke Memphis TN 38120-2815	Name of Employer V.V.P. America Occupation CEO	Date (month, day, year) 07/19/2006	Amount Received this Period 2000.00

TOTAL THIS PERIOD (last page only)

27044161425

26020550007

07/21/2008 FRI 17:27 FAX

26020550008

005/007

**48 HOURS NOTICE OF
CONTRIBUTIONS/LOANS RECEIVED**
(See Reverse Side for Instructions)

SECRETARY OF THE SENATE

06 JUL 24 AM 8:10

To be used to report all contributions (including loans) of \$1000 or more, received within 20 days of the election

1. NAME OF COMMITTEE IN FULL

Bob Carter For Senate, Inc.

ADDRESS (number and street)

518 Georgia Ave, 2nd Floor

CITY, STATE, and ZIP CODE

Chattanooga

TN

37403

2. NAME OF CANDIDATE

Bob Carter

Any information received 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.

3. FEC IDENTIFICATION NUMBER
C00407650

SIGNATURE (Optional)

DATE
07/20/2008

For further information contact:
Federal Election Commission
999 E Street, NW, Washington, DC 20463
Toll Free 800-424-9630, Local 202-454-1100

FEC FORM 6
(Revised 1/2001)

27044161426

26020550008

2 / 2

FEC FORM 6 - 48 HOUR NOTICE OF CONTRIBUTIONS / LOANS

(continuation page)

SECRETARY OF THE SENATE

Any information reported herein may not be copied for sale or use by any person for the purposes of soliciting contributions or for any other commercial purpose except that the name and address of any political committee may be used to solicit contributions from that committee.

JUL 24 PM 8:10

Name of Individual, Organization, or Corporation

Full Name, Address, and ZIP Code Barbara Cox Jonesborough TN 37659-7420	Name of Employer N/A Occupation Homemaker	Date (month, day, year) 07/18/2006	Amount Received this Period 2100.00
Full Name, Address, and ZIP Code Marshall Berry Harrison TN 37341-8872	Name of Employer self Occupation Contractor	Date (month, day, year) 07/18/2006	Amount Received this Period 1800.00
Full Name, Address, and ZIP Code Marshall Berry Harrison TN 37341-8872	Name of Employer self Occupation Contractor	Date (month, day, year) 07/18/2006	Amount Received this Period 2100.00
Full Name, Address, and ZIP Code Eric Gentry Harrison TN 37341-8862	Name of Employer Republic Parking Occupation General Manager	Date (month, day, year) 07/18/2006	Amount Received this Period 2000.00
Full Name, Address, and ZIP Code Angela Gentry Harrison TN 37341-8862	Name of Employer N/A Occupation Homemaker	Date (month, day, year) 07/18/2006	Amount Received this Period 2000.00
Full Name, Address, and ZIP Code Steve Byrum Signal Mountain TN 37377-2320	Name of Employer self Occupation Consultant	Date (month, day, year) 07/18/2006	Amount Received this Period 1000.00
TOTAL THIS PERIOD (last page only)			11100.00

27044161427

26020550009

27044161428

TAB 3

SECRETARY OF THE SENATE

06 JUL 20 AM 7:22

Page 1 of 1

FEC FORM 10

24-HOUR NOTICE OF EXPENDITURE FROM CANDIDATE'S PERSONAL FUNDS (11 CFR 400.21 and 400.22)

(Nationalities' Amendment)

1. Name of Candidate: **ROBERT P. CORKER JR** 2. Office Sought: **SENATE** 3. State: **TENNESSEE** 4. District: **56** 5. Candidate ID Number: **TN 00216**
 6. Name of Principal Campaign Committee: **BOB CORKER FOR SENATE, Inc.** 7. Committee ID Number: **000407650**
 8. Address: **518 GEORGIA AVENUE, 2ND FLOOR**
 9. City, State and ZIP Code: **CHATTANOOGA, TN 37403**

10. Expenditures of Personal Funds (If the candidate has made expenditures for different elections, submit a separate Form 10 for each election.)

Aggregate Expenditures Previously Reported During the Election Cycle

0.00

DATE	ELECTION	AMOUNT	CHECK IF LOAN/DEBT
07/03/2006	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	200,000.00	<input checked="" type="checkbox"/>
07/10/2006	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	445,000.00	<input checked="" type="checkbox"/>
07/18/2006	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	1,100,000.00	<input checked="" type="checkbox"/>
12/1/2006	<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		

11. Total Expenditures This Notice

1,745,000.00

12. Total Expenditures Election Cycle To Date

1,745,000.00

13. 24 Hour Notice of Legislative Contributions

a) Check box if this filing satisfies Form 8 filing requirements (see instructions)

b) Name of Employer: **SELF**c) Occupation: **BUSINESSMAN**

TYPE OR PRINT NAME OF COMMITTEE TREASURER

KIMBERLY KAEGI

SIGNATURE OF COMMITTEE TREASURER

DATE

7-19-6

FOR FURTHER INFORMATION CONTACT:
 Federal Election Commission, 435 E Street, NE, Washington, DC 20460
 Toll Free 800-424-9630, Local 202-694-1100

FEC Form 10 - 04/2005

100/100

07/18/2006 WED 22:48 FAX

27044161429

26020530886

27044161430

TAB 4

Page of

FEC FORM 10**24-HOUR NOTICE OF EXPENDITURE FROM CANDIDATE'S PERSONAL FUNDS (11 CFR 400.21 and 400.22)**
(Millionaires' Amendment)

1. Name of Candidate **ROBERT P. CORKER, JR.** 2. Office Sought **SENATE** 3. State **Tennessee** 4. District 5. Candidate ID Number **56TN00216**

6. Name of Principal Campaign Committee **Bob Corker For Senate, Inc.** 7. Committee ID Number **C 00407650**

8. Address **518 GEORGIA AVE, 2ND FLOOR**

9. City, State and ZIP Code **CHATTANOOGA TN 37403**

10. Expenditures of Personal Funds (If the candidate has made expenditures for different elections, submit a separate Form 10 for each election.)

Aggregate Expenditures Previously Reported During the Election Cycle

1,747,100.00

DATE	ELECTION	AMOUNT	CHECK IF LOAN/DEBT
A. 07 25 2006	<input checked="" type="checkbox"/> Primary General Other	420,000.00	<input checked="" type="checkbox"/>
B.	Primary General Other		
C.	Primary General Other		
D.	Primary General Other		

11. Total Expenditures This Notice

420,000.00

12. Total Expenditures Election Cycle To Date

2,167,100.00

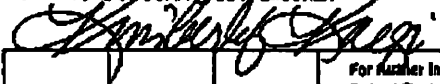
13. 48 Hour Notice of Last-Minute Contributions

a) Check box if this filing satisfies Form 6 filing requirements (see instructions) ☒b) Name of Employer: **SELF**c) Occupation **BUSINESSMAN**

TYPE OR PRINT NAME OF COMMITTEE TREASURER

Kimberly Kaegi

SIGNATURE OF COMMITTEE TREASURER



DATE

7-26-6

SPG020

For further information contact:
Federal Election Commission, 999 E Street, NW, Washington, DC 20463
Toll Free 800-424-9630, Local 202-694-1100

FEC Form 10 - 09/2005

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

The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked Delivery Confirmation™ Label <input type="checkbox"/>
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input checked="" type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked

The document preceding this page was received by FAX at the FEC. The receiving FAX machine has printed at the bottom of each page the date and time of receipt, the phone number of the transmitting machine and the sequential page numbers.

N/A
PREPARER

N/A
DATE PREPARED

(5/2004)

2603015327044161432