

JONES DAY

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August 16, 2018

VIA E-MAIL

**Rickida Morcomb
Audit Division
Federal Election Commission
1050 First Street, NE
Washington, DC 20463**

Re: Marsha Blackburn for Congress, Inc. (2015-2016 Cycle Audit)

Dear Ms. Morcomb:

Marsha Blackburn for Congress, Inc. (“Committee”) submits this response to items raised in the Federal Election Commission’s (“FEC” or “Commission”) Interim Audit Report issued on May 29, 2018 (“Report”), concerning the Committee’s activities during the 2015-2016 election cycle.

1. Misstatement of Financial Activity

The Report identifies certain purported misstatements of financial activity in the Committee’s disclosure reports from the 2015-2016 election cycle. The Report notes that the Committee nonetheless correctly reported its cash-on-hand balance at the end of the cycle.

The Committee’s new compliance team continues to assess the Report’s recommendation that the Committee amend its disclosure reports to correct the identified misstatements. Given the passage of time and the departure of the compliance staff from the 2015-2016 cycle, it may prove overly burdensome – or even impossible – for the Committee to remedy the Report’s findings. The Committee is confident, however, that the changes it has made in its compliance operation will help ensure greater accuracy for its future reports.

2. Disclosure of Occupation/Name of Employer

The Report recommends that the Committee establish “best efforts” by amending its 2015-2016 election cycle reports to disclose omitted employer/occupation information for contributors who contributed to the Committee during the cycle and for whom the Committee possesses the required information.

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The Committee has amended its reports consistent with the Commission's recommendation. The Committee elected to do so using the disclosure method set forth at 11 C.F.R. § 104.7(b)(4)(i)(A), as approved by the Audit Division (in consultation with the Reports Analysis Division) via email dated June 4, 2018. Accordingly, the Committee filed with its 2018 July Quarterly Report an amended memo Schedule A listing 2015-2016 contributions for which previously omitted contributor identifications had been received.

The Committee wishes to reiterate that, as noted in the Report, its new compliance team is emphasizing the timely sending of best-efforts letters and the maintenance of records demonstrating the Committee's follow-up correspondence – whether written or oral – consistent with the FEC's recommended procedures.

3. Receipt of Contributions Potentially in Excess of the Limits

The Report identifies \$12,200 in contributions from the 2015-2016 cycle it deems to be in excess of per-election limits. Even though the Committee believes it previously received timely authorizations from the identified contributors to redesignate or retribute their contributions, the Committee has complied with the Report's recommendation. The Committee has received signed retribution forms from two contributors identified in the Report, see Attachment A (copies of retribution forms), and refunded the remainder of the identified contributions, see Attachment B (refund check copies).

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The Committee appreciates the Commission's attention to this response and hopes it has become clear during the course of the audit that the Committee takes its compliance and reporting obligations very seriously.

Respectfully submitted,



E. Stewart Crosland

Enclosures

**Cc: Thomas Hintermister, Assistant Staff Director, Audit Division
Rosa Crussiah, Lead Auditor**