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2008 JUL 23 AM 9:19

July 1, 2008

Mr. Christopher A. Whyrick
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Mr. Whyrick:

Huckabee For President, Inc. (FEC ID# C00431809) is in receipt of your Request for Additional Information dated July 3, 2008, referencing our April Monthly Report (3/1/08 – 3/31/08) (hereafter referred to as "RFAI"). You have requested additional information to clarify issues regarding two items.

Item 1

The two contributions from "Marshall Cooper" cited in the RFAI are contributions from two different individuals who happen to share the same name.

- On December 31, 2007, the Committee received a contribution of \$2,000 from Marshall Cooper of 35 Anderson Road, Greenwich, CT 06830. Mr. Cooper is a self-employed entrepreneur. See January 31, 2008 Year End Report, Amended 04/07/2008, page 535, Schedule A, Entry A, attached.
- On March 5, 2008, the Committee received a contribution of \$1,000 from Marshall Cooper of 445 Viking Drive, Suite 220, Virginia Beach, VA 23452. Mr. Cooper is a marketing director for an entity called Greenhaven. See April 2008 Monthly Report, Amended 05/20/08, page 56, Schedule A, Entry B, attached.

Upon receipt of the above mentioned contribution on March 5, 2008, the Committee took the necessary steps to verify that these were, in fact, two different individuals.

Item 2

All contributions received by the Committee after the date on which Governor Huckabee announced the end of his campaign, *i.e.*, March 4, 2008, have been used to retire the campaign's net debts outstanding, in strict accordance with 11 C.F.R. 110.1(b)(3)(ii). Contributors were notified that their contributions would be used to retire the Committee's debt.

Paid for by Huckabee for President, Inc.
www.mikehuckabee.com

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As of March 4, 2008, the Committee had a reasonable expectation that it would incur further compliance expenses and continued to receive invoices for expenses incurred. As the Committee's April 2008 monthly report, along with subsequent monthly reports, indicate, that expectation was, at all times, correct. The Committee's April 2008 monthly report, which covers the reporting period March 1 – 31, 2008, discloses debts and obligations of \$72,326.70. The Committee's most recently filed report, the June 2008 monthly report, discloses debts and obligations owed by the Committee in the amount of \$121,109.35. Once the Committee is able to extinguish all debts and obligations, if any surplus of funds exists, the Committee will make refunds to contributors at that time.

If you have any further questions or need further clarification, please do not hesitate to contact me.

Sincerely,

Bryan S. Jeffrey, Treasurer
Huckabee for President, Inc.

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**SCHEDULE A (FEC Form 3P)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER PAGE 338 / 3518
(check only one)

16
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Any information copied 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.

NAME OF COMMITTEE (In Full)
HUCKABEE FOR PRESIDENT, INC.

A. Full Name (Last, First, Middle Initial) Marshall Cooper Mailing Address 35 Anderson Road City State Zip Code Greenwich CT 06830 FEC ID number of contributing federal political committee.		Date of Receipt M M / D D / Y Y Y Y 12 / 31 / 2007 Amount of Each Receipt this Period 2000.00
Name of Employer Self-Employed Occupation Entrepreneur Receipt For: 2008 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼ Election Cycle-to-Date ▼ 2000.00		Transaction ID: SA17A.136168
B. Full Name (Last, First, Middle Initial) Mildred L. Cooper Mailing Address 6564 Valleybrook Drive City State Zip Code Dallas TX 75254 FEC ID number of contributing federal political committee.		Date of Receipt M M / D D / Y Y Y Y 12 / 06 / 2007 Amount of Each Receipt this Period 1850.00
Name of Employer Occupation Homemaker Receipt For: 2008 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼ Election Cycle-to-Date ▼ 2300.00		Transaction ID: SA17A.105609
C. Full Name (Last, First, Middle Initial) Richard Cooper Mailing Address 915 Bowring Park City State Zip Code Nashville TN 37215 FEC ID number of contributing federal political committee.		Date of Receipt M M / D D / Y Y Y Y 12 / 10 / 2007 Amount of Each Receipt this Period 500.00
Name of Employer Cooper, Travis & Company Occupation CPA Receipt For: 2008 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼ Election Cycle-to-Date ▼ 500.00		Transaction ID: SA17A.109345

SUBTOTAL of Receipts This Page (optional)	4350.00
TOTAL This Period (last page this line number only)	

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**SCHEDULE A (FEC Form 3P)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 56 / 398

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Any information copied 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.

NAME OF COMMITTEE (In Full)
HUCKABEE FOR PRESIDENT, INC.

A. Full Name (Last, First, Middle Initial) Jeffrey Cooper Mailing Address 923 St. Louis Street City State Zip Code Edwardsville IL 62025 FEC ID number of contributing federal political committee.		Date of Receipt MM / DD / YYYY 03 / 11 / 2008 Amount of Each Receipt this Period 1000.00
Name of Employer Requested Receipt For: 2008 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Occupation Requested Election Cycle-to-Date ▼ 1000.00	Transaction ID: SA17A.271714
B. Full Name (Last, First, Middle Initial) Marshall Cooper Mailing Address 448 Viking Drive Suite 220 City State Zip Code Virginia Beach VA 23452 FEC ID number of contributing federal political committee.		Date of Receipt MM / DD / YYYY 03 / 05 / 2008 Amount of Each Receipt this Period 1000.00
Name of Employer Requested Receipt For: 2008 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Occupation Requested Election Cycle-to-Date ▼ 1000.00	Transaction ID: SA17A.273254
C. Full Name (Last, First, Middle Initial) Don Cornelius Mailing Address 1608 NW 19th Street City State Zip Code Grand Prairie TX 75050 FEC ID number of contributing federal political committee.		Date of Receipt MM / DD / YYYY 03 / 10 / 2008 Amount of Each Receipt this Period 1000.00
Name of Employer Requested Receipt For: 2008 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Occupation Requested Election Cycle-to-Date ▼ 1000.00	Transaction ID: SA17A.273296

SUBTOTAL of Receipts This Page (optional)	3000.00
TOTAL This Period (last page this line number only)	

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

June 3, 2008

Bryan Jeffrey, Treasurer
Huckabee for President, Inc.
C/O JPMS Cox, PLLC
11300 Cantrell Road, Suite 301
Little Rock, AR 72212

Response Due Date:
July 3, 2008

Identification Number: C00431809

Reference: Amended April Monthly Report (3/1/08 - 3/31/08), received 5/20/08

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) 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 2 items:

1. Schedule A-P of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached). You should examine all of your contributions to check for additional excessive contributions. The Committee's procedures for processing contributions should also be reviewed.

An individual or a political committee other than an authorized committee or qualified multi-candidate committee may not make a contribution to a candidate for federal office in excess of \$2,300 per election. An authorized committee may not make a contribution to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (2 U.S.C. §§ 441a(a) and (f); 11 CFR §§ 110.1(b), (e) and (k))

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If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information. If any contribution you received exceeds the limits, you may have to refund the excessive amount.

Excessive contributions may be retained if within sixty (60) days of receipt, the excessive portions are properly redesignated or reattributed. Guidelines for each option are provided below:

For reattributions, excessive contributions from individuals can be retained, if within sixty (60) days of receipt, the excessive amount is properly reattributed to another person. Please note that reattributions only apply to excessive contributions from individuals. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written documentation, signed by each contributor, authorizing a reattribution and indicating the amount of the contribution to be attributed to each contributor, or (2) the committee reattributes, by presumption, the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

For redesignations, the funds can be retained if within sixty (60) days of receipt the excessive amount is properly redesignated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election, or (2) your committee redesignates by presumption the excessive portion of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) Please note that you cannot presumptively redesignate an excessive contribution from a multi-candidate committee. Also, a contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt of the contribution, the excessive amount must be refunded. See 11 CFR § 103.3(b)(3).

Please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/ or letters reattributing or redesignating the contributions in question. Refunds are reported on Line 28 of the Detailed Summary Page and on a supporting Schedule B-P of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A-P of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR §§ 104.8(d)(2), (3) and (4))

The acceptance of excessive contributions is a serious problem. Again, the committee's procedures for processing contributions should be examined and corrected in order to avoid this problem. Although the Commission may take further legal action, prompt action by you to refund, redesignate, and/or reattribute of the excessive amount will be taken into consideration.

2. Schedule A-P of your report discloses the receipt of contributions designated for the primary election that were received after the date the candidate terminated his candidacy.

The candidate was running for the Republican nomination for President until his announcement on **March 4, 2008** not to seek the nomination. At this time, his status as a candidate for the 2008 Election Cycle ended. Your committee is entitled to keep all primary election contributions received prior to that announcement as excess campaign funds, and is allowed to use them in accordance with 11 CFR § 113.2. **However, primary election contributions received after the date of the announcement must be refunded**, except to the extent there are net debts outstanding for the campaign on the date each primary election contribution is received. (11 CFR § 110.1(b)(3)(ii))

If any of the apparent primary election contributions in question were incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

Please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks. Refunds are reported on Line 28 of the Detailed Summary Page and on a supporting Schedule B-P of the report covering the period in which they are made. (11 CFR § 104.8(d)(4))

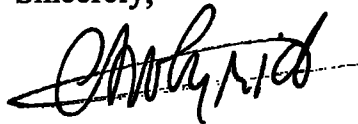
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Please amend your report to disclose what action will be taken in regard to these primary election contributions received by your committee. Although the Commission may take further legal action, prompt action by you to refund of these contributions will be taken into consideration.

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) 694-1161.

Sincerely,



Christopher A. Whyrick
Senior Campaign Finance Analyst
Reports Analysis Division

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**Excessive and/or Prohibited Contributions
Huckabee for President, Inc. (C00431809)
Amended April Monthly Report (3/1/08 - 3/31/08), received 5/20/08**

**P = Primary Election
G = General Election**

CONTRIBUTOR NAME		DATE	AMOUNT	ELECTION
Cooper	Marshall	12/31/2007	\$2,000.00	P
Cooper	Marshall	3/5/2008	\$1,000.00	P

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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.

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<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)
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Delivery Confirmation™ or Signature Confirmation™ Label <input type="checkbox"/>	
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<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input checked="" type="checkbox"/> Overnight Delivery Service (Specify): <i>FedEx</i>	Shipping Date <i>7/2/08</i>
Next Business Day Delivery <input type="checkbox"/>	
<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 type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked

JML
 PREPARER

7/5/08
 DATE PREPARED