



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

APR 29 1998

Bob Bennie, Treasurer  
Nebraska Republican Federal  
Campaign Committee  
421 S. 9th Street, Suite 233  
Lincoln, NE 68508

Identification Number: C00032334

Reference: Year End Report (7/1/97-12/31/97)

Dear Mr. Bennie:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to check the appropriate CATEGORY box for Administrative Expenses. Please amend your report by changing the CATEGORY for your Administrative Expenses to ADMINISTRATIVE/VOTER DRIVE.

-The Detailed Summary Page, on Line 18 Column B of your report, discloses \$332,918.82 in transfers from the non-federal account for joint activity for the calendar year. However, Line 21 (a)(ii) Column B discloses \$315,359.20 as the non-federal share for joint activity for the calendar year. While the non-federal account is permitted to transfer funds to the federal account for allocable activity, transfers from the non-federal account for amounts greater than the non-federal share of allocable activity are prohibited by 11 CFR §102.5(a)(1)(i). Please clarify this discrepancy.

The Commission recommends that you immediately transfer back to the non-federal account, the amount which was transferred to the federal account in excess of the non-federal share. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

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-Payments made to credit card companies must identify the original vendors from which you have purchased an item or service if your payments to these vendors have exceeded \$200 this year. Please amend your report by providing the mailing address, date, amount, and purpose of such payments as required by 11 CFR §104.9(b).

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule H4 of your report to clarify the following description(s): administrative expenses, reimbursement, Wameta event, SCC reimbursement, reimbursement from chair meeting and RNC expense. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive, TLS1, TLP2, TLD2 and TLD3 are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct EVENT YEAR-TO-DATE totals.

-Please amend your Schedule H2 by removing ADMINISTRATION as a fundraising event. The allocation ratio for Administrative/Voter Drive Expenses for Party Committees should be determined using the Ballot Composition Method on Schedule H1. For further guidance, please refer to 11 CFR § 106.5(d).

-Schedule D of your report has failed to include certain information. Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and end of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report by providing the Nature of Debt (purpose). 11 CFR §104.11

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-Your report includes computer produced formats of Schedules H2, H3 and H4. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Alicia K. Richardson  
Reports Analyst  
Reports Analysis Division

98.03.305.4281