RQ-2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Rebecca L. Gumm, Treasurer
Ashland Inc. Political Action Committee
for Employees ('PACE')
50 E. Rivercenter Boulevard
P.O. Box 391
Covington, KY 41012

SEP 04 2002

Identification Number: C00075994

Reference: July Monthly Report (6/1/02-6/30/02)

Dear Ms. Gumm:

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:

-Schedule B of your report (pertinent portion(s) attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of $5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the Primary election; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

A response or 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. 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 need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Colleen Manning
Reports Analyst
Reports Analysis Division

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22037722208

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

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

FOR LINE NUMBER: (check only one)
☐ 21b ☐ 22 ☒ 23 ☐ 24 ☐ 25
☐ 26 ☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29

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NAME OF COMMITTEE (In Full)
ASHLAND INC. POLITICAL ACTION COMMITTEE FOR EMPLOYEES ('PACE')

CH

A.
Full Name (Last, First, Middle Initial): ALLARD FOR US SENATE
Mailing Address: 300 W. PLAZA DRIVE # 100
City: LITTLETON State: CO Zip Code: 80129
Purpose of Disbursement: 2002 PRIMARY ELECTION
Candidate Name: WAYNE ALLARD
24K Category/Type
Office Sought: House / X Senate / President
State: CO District:
Disbursement For: 2002 / X Primary / General / Other (specify) ▼
Date of Disbursement: 06 / 20 / 2002
Amount of Each Disbursement this Period: 2000.00
Transaction ID: B004490S000005L23

B.
Full Name (Last, First, Middle Initial): FRIENDS OF KATHERINE HARRIS
Mailing Address: P.O. BOX 25187
City: SARASOTA State: FL Zip Code: 34277
Purpose of Disbursement: 2002 PRIMARY ELECTION
Candidate Name: KATHERINE HARRIS
24K Category/Type
Office Sought: X House / Senate / President
State: FL District: 13
Disbursement For: 2002 / X Primary / General / Other (specify) ▼
Date of Disbursement: 06 / 20 / 2002
Amount of Each Disbursement this Period: 1000.00
Transaction ID: B004490S000004L23

C.
Full Name (Last, First, Middle Initial): FLETCHER FOR CONGRESS
Mailing Address: P. O. BOX 4703
City: LEXINGTON State: KY Zip Code: 40544-4703
Purpose of Disbursement: 2002 GENERAL ELECTION
Candidate Name: ERNIE FLETCHER
24K Category/Type
Office Sought: X House / Senate / President
State: KY District: 06
Disbursement For: 2002 / Primary / X General / Other (specify) ▼
Date of Disbursement: 06 / 12 / 2002
Amount of Each Disbursement this Period: 2000.00
Transaction ID: B004524S000004L23

SUBTOTAL of Disbursements This Page (optional) ▶ 5000.00

TOTAL This Period (last page this line number only) ▶

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SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

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

FOR LINE NUMBER: (check only one)
[ ] 21b [ ] 22 [X] 23 [ ] 24 [ ] 25
[ ] 26 [ ] 27 [ ] 28a [ ] 28b [ ] 28c [ ] 29

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NAME OF COMMITTEE (in Full)
Arch Coal, Inc., Political Action Committee (ARCHPAC)

CM

A. Full Name (Last, First, Middle Initial)
Wayne Allard for United States Senate

Date of Disbursement: 09 / 25 / 2001

Mailing Address: 507 Capital Court NE, Suite 100
City: Washington State: DC Zip Code: 20002

Amount of Each Disbursement this Period: 3000.00

Purpose of Disbursement: Reelection US Senate Colorado

Candidate Name: Wayne Allard for United States Senate

Category/Type: –

Office Sought: House / X Senate / President
State: CO District:

Disbursement For: 2002
X Primary / General / Other (specify)

Transaction ID: SB23.7377

B. Full Name (Last, First, Middle Initial)
Wayne Allard for United States Senate

Date of Disbursement: 09 / 25 / 2001

Mailing Address: 507 Capital Court NE, Suite 100
City: Washington State: DC Zip Code: 20002

Amount of Each Disbursement this Period: 1000.00

Purpose of Disbursement: Reelection US Senate Colorado

Candidate Name: Wayne Allard for United States Senate

Category/Type:

Office Sought: House / X Senate / President
State: CO District:

Disbursement For: 2002
Primary / X General / Other (specify)

Transaction ID: SB23.7378

C. Full Name (Last, First, Middle Initial)
West Virginia Republican Party

Date of Disbursement: 11 / 20 / 2001

Mailing Address: 1620 Kanawha Blvd East, Suite 4-B
City: Charleston State: WV Zip Code: 25311

Amount of Each Disbursement this Period: 100.00

Purpose of Disbursement: State Level Political Event

Candidate Name:

Category/Type:

Office Sought: House / Senate / President
State: District:

Disbursement For: 2002
Primary / X General / Other (specify)

Transaction ID: SB23.7387

SUBTOTAL of Disbursements This Page (optional) ..... ▶ 4100.00

TOTAL This Period (last page this line number only) ..... ▶

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

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

FOR LINE NUMBER: (check only one)
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NAME OF COMMITTEE (In Full)
Arch Coal, Inc., Political Action Committee (ARCHPAC)

A.
Full Name (Last, First, Middle Initial): WAYNE ALLARD FOR UNITED STATES SENATE COMMITTEE
Date of Disbursement: 05 / 10 / 2001
Mailing Address: PO BOX 32
City: LOVELAND State: CO Zip Code: 80539
Amount of Each Disbursement this Period: 1000.00
Purpose of Disbursement: Reelection Senate - Colorado
Candidate Name: Wayne Allard for United States Senate
Category/Type: –
Office Sought: House / X Senate / President
Disbursement For: 2002 / X Primary / General / Other (specify) ▼
State: CO District: 00
Transaction ID: SB23.7116

B.
Full Name (Last, First, Middle Initial): WHITFIELD FOR CONGRESS COMMITTEE
Date of Disbursement: 05 / 15 / 2001
Mailing Address: P.O. BOX 391
City: HOPKINSVILLE State: KY Zip Code: 42241
Amount of Each Disbursement this Period: 1000.00
Purpose of Disbursement: Reelection Congress - KY
Candidate Name: Whitfield for Congress
Category/Type:
Office Sought: X House / Senate / President
Disbursement For: 2002 / X Primary / General / Other (specify) ▼
State: KY District: 01
Transaction ID: SB23.7120

C.
Full Name (Last, First, Middle Initial): WYOMING REPUBLICAN PARTY INC
Date of Disbursement: 04 / 30 / 2001
Mailing Address: 400 E FIRST ST SUITE 314
City: CASPER State: WY Zip Code: 82601
Amount of Each Disbursement this Period: 1000.00
Purpose of Disbursement: Contribution
Candidate Name: WYOMING REPUBLICAN PARTY INC
Category/Type:
Office Sought: House / Senate / President
Disbursement For: 2002 / X Primary / General / Other (specify) ▼
State: District:
Transaction ID: SB23.7108

SUBTOTAL of Disbursements This Page (optional) ▶ 3000.00

TOTAL This Period (last page this line number only) ▶ 41000.00

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SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

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

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[ ] 21b [ ] 22 [X] 23 [ ] 24 [ ] 25
[ ] 26 [ ] 27 [ ] 28a [ ] 28b [ ] 28c [ ] 29

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NAME OF COMMITTEE (in Full)
Arch Coal, Inc., Political Action Committee (ARCHPAC)

A.
Full Name (Last, First, Middle Initial): Team Emerson
Mailing Address: P.O. Box 16021
City: Alexandria State: VA Zip Code: 22303
Purpose of Disbursement: Reelection US Congress MO 8th Dist
Candidate Name: Team Emerson
Category/Type: –
Office Sought: X House / Senate / President
State: MO District: 8
Disbursement For: 2002 Primary X General Other (specify) ▼
Date of Disbursement: 11 / 20 / 2001
Amount of Each Disbursement this Period: 1000.00
Transaction ID: SB23.7372

B.
Full Name (Last, First, Middle Initial): The Equality Fund
Mailing Address: P.O. Box 1676
City: Casper State: WY Zip Code: 82602
Purpose of Disbursement: PAC Contribution
Candidate Name:
Category/Type:
Office Sought: House / Senate / President
State: District:
Disbursement For: 2002 Primary X General Other (specify) ▼
Date of Disbursement: 12 / 14 / 2001
Amount of Each Disbursement this Period: 5000.00
Transaction ID: SB23.7373

C.
Full Name (Last, First, Middle Initial): Wayne Allard for United States Senate
Mailing Address: 507 Capitol Court NE Suite 100
City: Washington State: DC Zip Code: 20002
Purpose of Disbursement: Reelection US Senate Colorado
Candidate Name: Wayne Allard for United States Senate
Category/Type:
Office Sought: House / X Senate / President
State: CO District:
Disbursement For: 2002 X Primary General Other (specify) ▼
Date of Disbursement: 09 / 11 / 2001
Amount of Each Disbursement this Period: 1000.00
Transaction ID: SB23.7376

SUBTOTAL of Disbursements This Page (optional) ▶ 7000.00

TOTAL This Period (last page this line number only) ▶

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ITEMIZED DISBURSEMENTS

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NAME OF COMMITTEE (In Full)
ASHLAND INC. POLITICAL ACTION COMMITTEE FOR EMPLOYEES ('PACE')

A. Full Name (Last, First, Middle Initial): DOYLE FOR CONGRESS COMMITTEE
Mailing Address: P.O. BOX 17425
City: PITTSBURGH State: PA Zip Code: 15235
Purpose of Disbursement: 2002 GENERAL ELECTION
Candidate Name: MIKE DOYLE
24K Category/Type
Office Sought: X House / Senate / President
Disbursement For: 2002 / Primary / X General / Other (specify)
State: PA District: 14
Date of Disbursement: 06 / 28 / 2002
Amount of Each Disbursement this Period: 500.00
Transaction ID: B00452400000003L23

B. Full Name (Last, First, Middle Initial): WELDON FOR CONGRESS COMMITTEE
Mailing Address: P.O. BOX 1992
City: MEDIA State: PA Zip Code: 19063
Purpose of Disbursement: 2002 GENERAL ELECTION
Candidate Name: CURT WELDON
24K Category/Type
Office Sought: X House / Senate / President
Disbursement For: 2002 / Primary / X General / Other (specify)
State: PA District: 07
Date of Disbursement: 06 / 28 / 2002
Amount of Each Disbursement this Period: 1000.00
Transaction ID: B00451600000002L23

C. Full Name (Last, First, Middle Initial): LINDSEY GRAHAM FOR SENATE
Mailing Address: P.O. BOX 1155
City: SENECA State: SC Zip Code: 29679
Purpose of Disbursement: 2002 PRIMARY ELECTION
Candidate Name: LINDSEY GRAHAM
24K Category/Type
Office Sought: House / X Senate / President
Disbursement For: 2002 / X Primary / General / Other (specify)
State: SC District:
Date of Disbursement: 06 / 28 / 2002
Amount of Each Disbursement this Period: 1000.00
SC PRIMARY 6/11/02
Transaction ID: B00451600000001L23

SUBTOTAL of Disbursements This Page (optional) ► 2500.00

TOTAL This Period (last page this line number only) ►