NEBRASKA REPUBLICAN PARTY
David J. Kramer, Chairman

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2001 JUN 25 A 10:43

June 21, 2001

Mr. Dominick Ciaraldi
Federal Election Commission
999 E Street NW
Washington, DC 20463

Identification Number: C00032334

Reference: 30 Day Post-General Report (10/19/00 – 11/27/00)

Dear Mr. Ciaraldi:

This letter and filing are in reference to your attached letter dated June 6, 2001 regarding the Nebraska Republican Federal Campaign Committee's 30 Day Post-General Report. This is an amended report to the original report filed on December 5, 2000. This amended report has addressed the concerns of the Commission as stated forth in the attached letter.

1. Line 6(a) of the Summary Page has been corrected to represent the total cash-on-hand as of January 1, 2000 along with the beginning cash balance of the report to equal that of the Amended 12 Day Pre-General Report.
2. This amended report has the corrected year-to-date calculations for Administrative/Voter Drive, SBM1, SBM 2, SBM 3, NEDA 00 and SRD.
3. Calculations for Line 6(d), Column B have been corrected.
4. Schedule A has been corrected to reflect the correct disclosure of the identification of all individuals who contributed in excess of $ 200 in a calendar year. We have also included the full name, mailing address, occupation and name of employer.
5. Correction to transfer received from the National Republican Senatorial Committee that was erroneously reported on the original report.
6. Schedule B has been corrected to properly report transfer to affiliated/other party committees.
7. The detailed summary page has been corrected.
8. Schedules H2 and H4 have been corrected. Any activity that was 100% Federal was itemized on the Schedule B, for Line 21(b) per the Commission's recommendations. The ratio's have been properly identified as to new or same as previously reported.

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9. All expenditures have been clarified to exceed the commission's guidelines.
10. This report contains a corrected Schedule H2 to properly reflect the activities and events the party made expenditures for.
11. Although this report is not signed by the Treasurer, an amended report signed by the treasurer will be mailed on June 27, 2001.

Please consider this amended filing as being filed within the fifteen days of your letter dated June 6, 2001. This amended report has addressed the concerns of the Commission. Please do not hesitate to contact me with any questions or concerns.

Sincerely,

Benjamin Kiser
Executive Director

BJK/cmf

Enclosures

Paid for by the Nebraska Republican Party

421 South 9th Street, Suite 233 Lincoln, Nebraska 68508 Telephone (402) 475-2122 Fax (402) 475-3541
email: info@negop.org visit us on the web: www.negop.org

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

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

JUN 6 2001

Identification Number: C00032334

Reference: 30 Day Post-General Report (10/19/00-11/27/00)

Dear Ms. Carlson:

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:

- Line 6(a) of the Summary Page represents the total cash-on-hand as of January 1, 2000. This figure should be the same on all the reports covering the calendar year. Please amend your report to clarify the change made in Line 6(a).

- The beginning cash balance of this report should equal the ending balance of your Amended 12 Day Pre-General Report, dated 5/10/01. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

- The totals listed on Lines 6(c), 7, 11(a)(i), 11(a)(ii), 11(a)(iii), 11(c), 11(d), 12, 18, 19, 21(a)(i), 21(a)(ii), 21(b), 21(c), 30 and 31, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

- Your calculations for Line 6(d), Column B appear to be incorrect. FEC calculations disclose this amount(s) to be $2,656,457.69. Please provide the corrected total(s) on the Summary Page.

Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of $200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur <u>no later than 30 days</u> after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

✓The identification of each contributor, including an adequate occupation and name of employer for each, must be provided if the person has contributed in excess of $200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry inadequately identified as U.P.

✓2 U.S.C. §434(b)(3) requires itemization of contributions from individuals and persons other than political committees, where the aggregate total from the contributor exceeds $200 in a calendar year. In addition, 11 CFR §104.3(a)(2)(i)(B) requires a committee to report the total amount of unitemized contributions (see Line 11(a)(ii) of the Detailed Summary Page). If a committee wishes to disclose contributions regardless of the amount contributed, the committee must separate (on separate receipt schedules) those contributors requiring itemization from those who are not required to be itemized. 11 CFR §104.3(a)(4)(i) For future filings, please submit your reports in this order.

✓A review of the reports filed by your committee (pertinent portion(s) attached) indicates that your committee received a transfer(s) from the National Republican Senatorial Committee which has not been disclosed on their report(s) of receipts and disbursements. Please provide clarifying information regarding the source of the transfer(s) received by your committee.

-Line 22 of the Detailed Summary Page of your report discloses a total of $0.00 in transfers to affiliated/other party committees. The sum of the entries itemized on Schedule B, however, indicates the total to be $909.36. Please amend your report to clarify the discrepancy.

-The Detailed Summary Page, on Line 18 Column A of your report, discloses $215,190.61 in transfers from the non-federal account for joint activity for the reporting period. However, Line 21 (a)(ii) Column A discloses $165,161.59 as the non-federal share for joint activity for the reporting period. While the non-federal account is permitted to transfer funds to the federal account for shared activity, transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of the transfers-in from the non-federal account.

The Commission recommends that you immediately transfer back to the non-federal account, the total excessive amount which was received by your federal account outside the 70-day time period. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

✓ -Schedules H2 and H4 disclose 100% federal activity. Please be advised that by definition, this activity does not qualify as a shared expense to be allocated between your federal and non-federal accounts. This activity should be itemized on a Schedule B for Line 21(b) of the Detailed Summary Page. Any reimbursement from your committee's non-federal account for any portion of this activity is not permissible and must be returned. Please amend your report to clarify this discrepancy.

✓ -On Schedule H2, you disclose the ratio for SBM8 to be NEW; however, Schedule H2 of your Amended October Quarterly Report, dated 4/20/01 disclosed a ratio for this activity/event which is identical to the one given in this report. Please amend your report to clarify this discrepancy. 11 CFR §104.10(a)(1)

✓ -Schedule H4 discloses disbursements for VICTORY and SBM which are categorized as fundraising; however, Schedule H2 does not include the allocation ratios for these activities. Please amend Schedule H2 to disclose the omitted ratios.

✓ -Schedule H2 of your report indicates that your committee participated in fundraising activities or events (VICTORY 2000) during the reporting period. However, there are no corresponding disbursements reflected on your Schedule H4. Note that you need not include activities on Schedule H2 if there are no corresponding payments made for the activity during the reporting period. If any disbursements were incorrectly reported, you should file an amended Schedule H4 with the correct unique identifying code or title, or provide clarifying information regarding the activities on Schedule H2.

-Please clarify all expenditures made for "stenberg signs", "television/radio ad" and "television/radio ad production" on Schedule(s) H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E or F supporting Lines 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): "voter drive". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

√-Please amend your report by providing the address for each disbursement itemized on Schedule H4 supporting Line 21(a).

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive, and the events/activities listed as "VICTORY" and "SBM" 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 <u>within a specific event</u>. 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.

-Schedule H4 of your report discloses a disbursement(s) to "Rogers for Congress-MI". Please be advised that contributions to federal and non-federal committees do not qualify as shared expenses to be allocated between your federal and non-federal accounts. Contributions to federal committees should be disclosed on a Schedule B supporting Line 23 of the Detailed Summary Page and contributions to non-federal committees on a separate Schedule B supporting Line 29. Any reimbursement from your committee's non-federal account for any portion of this contribution(s) is not permissible. 11 CFR §102.5(a)(1)(i)

The Commission recommends that you immediately transfer the funds received by your federal account, as reimbursement for the non-federal portion, back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

√-Please identify the name and address of the recipient candidate(s) or committee(s) for the in-kind contributions disclosed on Schedule B supporting Line 22 of the Detailed Summary Page.

-All reports must hear an original signature of the treasurer or designated agent. Filing a photocopy of your report does not fulfill this requirement. Please file a report bearing an appropriate original signature. 2 U.S.C. §434(a)(1) and 11 CFR §104.14

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 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Dominick Ciaraldi
Reports Analyst
Reports Analysis Division

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20036603385

SCHEDULE A **ITEMIZED RECEIPTS**

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

FOR LINE NUMBER 12

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)
NEBRASKA REPUBLICAN FEDERAL CAMPAIGN COMMITTEE

A. Full Name, Mailing Address and Zip Code
Republican National Committee
310 First Street Southeast
Washington,DC 20003-
Receipt For: Primary General Other (specify)
Name of Employer
Occupation
Date (month, day, year): 10/23/2000
fed
Amount of Each Receipt this Period: 50,000.00
Aggregate Year-to-Date -> 50,000.00

B. Full Name, Mailing Address and Zip Code
Republican National Committee
310 First Street Southeast
Washington,DC 20003-
Receipt For: Primary General Other (specify)
Name of Employer
Occupation
Date (month, day, year): 10/31/2000
Amount of Each Receipt this Period: 100,000.00
Aggregate Year-to-Date -> 150,000.00

DAC

C. Full Name, Mailing Address and Zip Code
NATIONAL REPUBLICAN SENATORIAL COMM.
425-2ND ST NE
WASHINGTON,DC 20002-
Receipt For: Primary General Other (specify)
Name of Employer
Occupation
Date (month, day, year): 10/19/2000
Amount of Each Receipt this Period: 15,000.00
Aggregate Year-to-Date -> 891,100.00

D. Full Name, Mailing Address and Zip Code
NATIONAL REPUBLICAN SENATORIAL COMM.
425-2ND ST NE
WASHINGTON,DC 20002-
Receipt For: Primary General Other (specify) Primary
Name of Employer
Occupation
Date (month, day, year): 10/24/2000
Amount of Each Receipt this Period: 11,000.00
Aggregate Year-to-Date -> 902,100.00

E. Full Name, Mailing Address and Zip Code
NATIONAL REPUBLICAN SENATORIAL COMM.
425-2ND ST NE
WASHINGTON,DC 20002-
Receipt For: Primary General Other (specify) Primary
Name of Employer
Occupation
Date (month, day, year): 10/26/2000
Amount of Each Receipt this Period: 30,000.00
Aggregate Year-to-Date -> 932,100.00

F. Full Name, Mailing Address and Zip Code
NATIONAL REPUBLICAN SENATORIAL COMM.
425-2ND ST NE
WASHINGTON,DC 20002-
Receipt For: Primary General Other (specify) Primary
Name of Employer
Occupation
Date (month, day, year): 10/27/2000
Amount of Each Receipt this Period: 10,500.00
Aggregate Year-to-Date -> 942,600.00

G. Full Name, Mailing Address and Zip Code
NATIONAL REPUBLICAN SENATORIAL COMM.
425-2ND ST NE
WASHINGTON,DC 20002-
Receipt For: Primary General Other (specify) Primary
Name of Employer
Occupation
Date (month, day, year): 10/30/2000
Amount of Each Receipt this Period: 1,800.00
Aggregate Year-to-Date -> 944,400.00

SUBTOTAL of Receipts This Page (optional)	$218,300.00
TOTAL This Period (last page this line number only)	$218,300.00

Federal Election Commission

ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

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

☐	Hand Delivered	Date of Receipt
☐	First Class Mail	POSTMARKED
☑	Registered/Certified Mail	POSTMARKED (R/C) 6-21-01
☐	No Postmark	
☐	Postmark Illegible	
☐	Received from the House office of Records and Registration	Date of Receipt
☐	Received from the Senate Office of Public Records	Date of Receipt
☐	Other (Specify):	Postmarked ______ and/or Date of Receipt
☐	Electronic Filing	

Jm D
PREPARER

6-25-01
DATE PREPARED

(6/2000)