



FEDERAL ELECTION COMMISSION RQ-3

WASHINGTON, D.C. 20463

May 16, 1997

Stan Huckaby, Treasurer  
National Republican Senatorial Committee  
425 Second Street, NE  
Washington, DC 20002

Identification Number: C00027466

Reference: July Monthly (6/1/96-6/30/96), August Monthly (7/1/96-7/31/96) and September Monthly (8/1/96-8/31/96) Reports

Dear Mr. Huckaby:

This letter is to inform you that as of May 15, 1997, the Commission has not received your response to our requests for additional information dated April 23, 1997. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Neil Evans on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosures



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Stan Huckaby, Treasurer  
National Republican Senatorial Committee  
425 Second Street NE  
Washington, DC 20002

APR 23 1997

Identification Number: C00027466

Reference: August Monthly Report (7/1/96-7/31/96)

Dear Mr. Huckaby:

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:

-Your report discloses earmarked contributions passed by NRSC check on an unapproved computer generated memo schedule for receipts and disbursements (enclosed), and on Schedule B for Line 23. Please provide a Schedule A for Line 11(a)(i) of the Detailed Summary Page to show the receipt of the earmarked contributions, and delete the memo schedules from your reporting.

-Your report discloses receipts totalling \$108,000 from 1996 Republican House-Senate Dinner, which is a joint fundraising committee affiliated with your committee. Please be advised that a memo Schedule A must be provided to itemize your committee's share of the gross contributions received through the joint fundraiser. The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the calendar year, and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount.  
11 CFR §102.17(c)(8)(i)(B)

-Schedule H2 of your report indicates that your committee participated in F6BE, F6CF, F6IC, F6LD, F6PC, F6RT, F6TM and F6TR activities or

*Celebrating the Commission's 20th Anniversary*

YESTERDAY, TODAY AND TOMORROW  
DEDICATED TO KEEPING THE PUBLIC INFORMED

events during the reporting period. However, there are no corresponding disbursements reflected on your Schedule H4. If any disbursements were incorrectly reported, you should file an amended Schedule H4 with the correct unique identifying code or title.

Note that you need not include activities on Schedule H2 if there are no corresponding payments made for the activity during the reporting period.

-Your EVENT YEAR-TO-DATE calculations for fundraising activities/events 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 fundraising EVENT YEAR-TO-DATE totals.

-Please clarify all expenditures made for MEDIA PLACEMENT on Schedule H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B, E, or F supporting Line 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

-11 CFR §105.2 states that any political committee which "...supports only candidates for nomination for election or election to the Senate of the United States..." shall file its reports with the Secretary of the Senate (emphasis added). The reports filed by your committee during the 1995-1996 election cycle show contributions being made to candidates for the U.S. House of Representatives and other non-U.S. Senate recipients, in addition to candidates for the U.S. Senate. Therefore, it appears that your committee must begin filing reports directly with the Federal Election Commission and discontinue filing with the Secretary of the Senate.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(c) preclude a political committee which is established and maintained by a national political party, and any

affiliated committees, from accepting contributions from a person or political committee in excess of \$20,000 in calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If you have received an excessive contribution(s), you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$20,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-Please be advised that for each earmarked contribution forwarded in the form of the contributor's check, the information required by 11 CFR §110.6(c)(1)(iv)(A) through (C) should be disclosed as a memo schedule. For future reporting, please provide a memo schedule that includes the date the contribution was received by your committee and the exact date the earmarked contribution was forwarded to the recipient candidate.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions from political committees (i.e., Goldman Sachs Partners PAC) should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-Your report includes computer produced formats of Schedules A and D. 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) 219-3580.

Sincerely,

A handwritten signature in black ink, appearing to read 'NE', with a long horizontal flourish extending to the right.

Neil Evans  
Reports Analyst  
Reports Analysis Division

SCHEDULE B

ITEMIZED EXPENDITURES  
PERIOD: FROM 07/01/96 TO 07/31/96

Any information copied from such Reports or 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.

--- MEMO ENTRY ---

NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS  
CONTRIBUTIONS EARMARKED FOR: People for Boaschitz '96

| FULL NAME, MAILING ADDRESS   | EMPLOYER/<br>OCCUPATION                        | DATE<br>RECEIVED | DATE<br>SENT | AMOUNT      |
|--|--|------------------|--------------|-------------|
| Templeton Jr., John M.<br>601 Pembroke Road<br>Bryn Mawr, PA 19010<br>RECEIPT FOR:             | Self-employed<br>Physician (surgeon)           | 07/03/96         | 07/23/96     | \$ 1,000.00 |
| NRSC CHECK   |  |                  |              |             |
| McGillicuddy, Dennis<br>5111 Ocean Boulevard<br>Suite C<br>Sarasota, FL 34242<br>RECEIPT FOR:  | Coakil Communications<br>INFORMATION REQUESTED | 06/28/96         | 07/23/96     | \$ 1,000.00 |
| NRSC CHECK   |  |                  |              |             |
| Pittaway, David B.<br>37th Floor<br>150 East 58th Street<br>New York, NY 10155<br>RECEIPT FOR: | INFORMATION REQUESTED<br>INFORMATION REQUESTED | 07/09/96         | 07/23/96     | \$ 1,000.00 |
| NRSC CHECK   |  |                  |              |             |

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PAGE TOTAL: \$ 3,000.00 (MEMO)

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SCHEDULE B

ITEMIZED EXPENDITURES  
PERIOD: FROM 07/01/96 TO 07/31/96

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--- MEMO ENTRY ---

NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS  
CONTRIBUTIONS EARMARKED FOR: McConnell Senate Committee '96

| FULL NAME, MAILING ADDRESS   | EMPLOYER/<br>OCCUPATION                        | DATE<br>RECEIVED | DATE<br>SENT | AMOUNT      |
|--|--|------------------|--------------|-------------|
| Misnoff, H.C. Buck<br>One Hill and Hollow Lane<br>Cincinnati, OH 45208<br>RECEIPT FOR: | INFORMATION REQUESTED<br>INFORMATION REQUESTED | 07/22/96         | 07/23/96     | \$ 1,000.00 |
| NRSC CHECK   |  |                  |              |             |

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REPORT COVERING PERIOD FROM 7/ 1/96 THRU 7/31/96 OVER \$200.00

| NAME AND ADDRESS/OCCUPATION/EMPLOYER   | DATE                          | THIS PERIOD                   | CALENDAR YR-TO-DATE |
|--|-------------------------------|-------------------------------|---------------------|
| MR. JAMES MCCONNON<br>170 LEONARD LANE<br>ROSWELL, GA 30076-3210                   | 7/ 1/96                       | \$60.00                       | \$551.00            |
| V.P. MRTG. RET/P-T P.R.<br>CROOM HOLDING CO.                                       |                               |                               |                     |
| MR. DONALD F. MCCONVILLE<br>21 WESTWAY DRIVE<br>SOUTHAMPTON, NY 11968              | 7/22/96<br>7/26/96            | \$200.00<br>\$5000.00         | \$6900.00           |
| RETIRED  |                               |                               |                     |
| MRS. CHARLOTTE MCCORMICK<br>5000 ROYAL MARCO WAY<br>MARCO ISLAND, FL 33937         | 7/ 8/96                       | \$10000.00                    | \$20290.00          |
| RETIRED  |                               |                               |                     |
| MR. KENNETH A. MCCRADY<br>107 NORTH SHERMAN<br>DENNIS, TX 75119-3949               | 7/17/96                       | \$200.00                      | \$300.00            |
| CORP. EXEC.<br>DENNIS BUSMCRS FORMS INC  |                               |                               | \$551.00            |
| MR. GILES C. MCCRARY<br>POST OFFICE BOX 790<br>POST, TX 79356-0790                 | 7/31/96                       | \$1100.00                     | \$1100.00           |
| INVESTMENTS<br>SELF  |                               |                               |                     |
| MR. MARSHALL D. MCCUEN<br>8140 TOWNSHIP LINE ROAD, #5420<br>INDIANAPOLIS, IN 46260 | 7/ 8/96                       | \$100.00                      | \$480.00            |
| RETIRED  |                               |                               |                     |
| MR. JAMES N. MCCULLY<br>4969 SILVERADO DRIVE<br>FAIRFIELD, CA 94533                | 7/ 3/96<br>7/24/96<br>7/24/96 | \$50.00<br>\$50.00<br>\$50.00 | \$491.00            |
| CONSULTANT   |                               |                               |                     |

\*\*\*REDESIGNATION REQUESTED 8/20/96\*\*\*

\*\*\*SEE TRANSFER 8/2/96\*\*\*

## NATIONAL REPUBLICAN SENATORIAL COMMITTEE

PAGE 325 OF 556  
LINE 11 A

Any information copied from such Reports or 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.

REPORT COVERING PERIOD FROM 4/ 1/96 THRU 4/30/96 OVER \$200.00

| NAME AND ADDRESS/OCCUPATION/EMPLOYER  | DATE                                     | THIS PERIOD                              | CALENDAR YR-TO-DATE |
|---|--|--|---------------------|
| MRS. R. W. MCCOLL<br>1519 CRESCENT ROAD<br>LAWRENCE, KS 66044                               | 4/ 8/96                                  | \$2500.00                                | \$2500.00           |
| INFORMATION REQUESTED<br>INFORMATION REQUESTED  |  |  |                     |
| MR. J. KNOX MCCONNELL<br>P.O. DRAWER AA<br>KEYSTONE, WV 24852                               | 4/18/96                                  | \$1000.00                                | \$1000.00           |
| BANKER<br>FIRST NATIONAL BANK   |  |  |                     |
| MR. L.A. MCCONNELL<br>211 POESTA<br>PORTLAND, TX 78374-1201                                 | 4/ 3/96<br>4/ 4/96<br>4/11/96<br>4/12/96 | \$15.00<br>\$33.00<br>\$33.00<br>\$15.00 | \$299.00            |
| RETIRED   |  |  |                     |
| MR. WILLIAM C. MCCONNELL, JR.<br>28015 S. OCEAN BLVD., APT. 11D<br>HIGHLAND BEACH, FL 33487 | 4/24/96<br>4/29/96                       | \$1000.00<br>\$25.00                     | \$1025.00           |
| PRESIDENT/RETIRED   |  |  |                     |
| MR. JAMES MCCONNON<br>170 LEEWARD LANE<br>ROSWELL, GA 30076-3210                            | 4/ 1/96<br>4/15/96<br>4/16/96            | \$50.00<br>\$25.00<br>\$100.00           | \$325.00            |
| V.P. METG. RET/P-T P.R.<br>CROOM HOLDING CO.  |  |  |                     |
| MR. DONALD F. MCCONVILLE<br>21 WESTWAY DRIVE<br>SOUTHAMPTON, NY 11968                       | 4/ 8/96<br>4/ 8/96<br>4/23/96            | \$300.00<br>\$250.00<br>\$200.00         | \$1150.00           |
| RETIRED   |  |  |                     |
| MRS. CHARLOTTE MCCORMICK<br>5000 ROYAL MARCO WAY<br>MARCO ISLAND, FL 33937                  | 4/12/96<br>4/ 9/96                       | \$15.00<br>\$10290.00                    | \$10290.00          |
| RETIRED   |  |  |                     |