



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Marina Taubenberger, Treasurer  
Republican Party of Minnesota  
480 Cedar Street - Suite 560  
Saint Paul, MN 55105

NOV 06 2002

Identification Number: C00001313

Reference: September Monthly Report (8/1/02-8/31/02)

Dear Ms. Taubenberger:

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:

-You have made disbursements for "RV rental US Sen - Coleman" which you have characterized as exempt activity. In order for an activity to be classified as exempt, it must meet the following conditions: (1) For slate cards and sample ballots: it names at least three candidates running for election to any public office, it is not distributed through public political advertising (including broadcast media, newspapers, magazines, and billboards), the content is limited to the identification of each candidate, the office or position currently held, the office sought and party affiliation, and the costs allocable to federal candidates are paid with permissible funds; (2) For campaign materials: the activity is conducted on behalf of the party's nominees in the general election, the materials are distributed by volunteers--not through public political advertising, the party committee does not use materials purchased by the national party committee or money transferred from the national committee to purchase materials, the party committee does not use funds designated for a particular federal candidate, a payment from a non-federal campaign to help pay for the materials does not exceed its allocated share of the expenses, and the costs allocable to federal candidates are paid with permissible funds; (3) For voter drives: the activity is on behalf of the party's Presidential and Vice Presidential nominees, the activity does not involve the use of public political

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advertising such as television, radio, newspapers, magazines, billboards or direct mail, phone banks are operated by volunteers (although paid professionals may design the system, develop calling instructions and train supervisors), the party committee does not use funds transferred by the national party committee for voter drive activities, the party committee does not use funds designated for a particular federal candidate, and the cost allocable to federal candidates are paid with permissible funds.

If the activity disclosed on your report does not meet the definition of "exempt" activity as described above, and if any portion of the expenditures were made on behalf of specifically identified candidates, this amount must be disclosed on Schedule B or F supporting Line 23 or 25 of the Detailed Summary Page as appropriate. Please provide the Commission with a more detailed explanation of these activities.

Please be advised 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

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excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Schedule A supporting Line 15 of your report discloses a payment(s) from a federal candidate committee(s) for goods and/or services provided by your committee. 11 CFR §100.7(a)(1)(iii)(A) states that "...the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution." Examples of goods and services include equipment, supplies, personnel, membership lists and mailing lists. The term "usual and normal charge" for goods is defined as "...the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution". The usual and normal charge for services is defined as "...the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the services were rendered." 11 CFR §100.7(a)(1)(iii)(B)

Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided to the federal candidate committee(s) and explain the steps your committee took in determining the amount(s) charged. If your committee provided the goods and/or services at less than the usual and normal charge, the difference between the two is considered to be an in-kind contribution by your committee to the federal candidate committee(s) and is subject to the limits set forth at 2 U.S.C. §441a. (11 CFR §100.7(a)(1)(iii)(A))

-Schedule A supporting Line 12 of your report discloses transfers from apparent joint fundraising committees. In addition, your report includes memo Schedule As for what appears to be your committee's share of the gross contributions received through these joint fundraising efforts. Please amend your report to clearly identify on the memo Schedule A, which joint fundraising committee each entry relates to.

-Schedule A supporting Line 12 discloses a transfer(s)-in from the "National Republican Senatorial Committee" and the "Republican National Committee- RNC". Schedule B supporting Line 21(b) reflects payments for "Coleman Lawn Signs" and "Buttons and Frisbee", "Bump. Stick. U.S. Senate Coleman MN," and "Signs". Please be advised that a state or local party committee may pay for campaign materials (such as pins, posters, bumper stickers and yard signs) that are distributed by volunteers in

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connection with activity on behalf of the party's nominees in a general election. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used, including distribution by direct mail (mailings by a commercial vendor or from commercial lists); all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR §100.7(b)(15) and (17) and to the Campaign Guide for Party Committees.

Please clarify the nature of the transfer(s)-in and subsequent payments for the aforementioned disbursement(s). If the activity disclosed on your report does not meet the definition of "exempt" activity as described above and if any portion of the expenditures were made on behalf of specifically identified candidates, that amount must be disclosed on Schedule B or F supporting Line 23 or 25 of the Detailed Summary Page as appropriate.

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive 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.

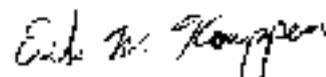
-Schedule H4 of your report discloses a payment(s) to "Fundraising Associates", which is categorized as an Administrative/Voter Drive expense; however, the purpose of disbursement disclosed is "Fundraising Commission". Please be advised that payments made for your committee's fundraising activities should be allocated according to the funds received method and the ratio reflected on Schedule H2. Please provide clarification regarding this apparent discrepancy.

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

A 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. Electronic filers must file amendments (to include statements, designation 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,



Erik W. Koeppen  
Campaign Finance Analyst  
Reports Analysis Division

**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)

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<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25
<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c

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)  
REPUBLICAN PARTY OF MINNESOTA

Full Name (Last, First, Middle Initial)

A. Can Am Recreational Vehicles

Date of Disbursement

07 / 24 / 2002

Mailing Address

16701 Greystone Ln

City

State

Zip Code

Jordan

MN

55352

Amount of Each Disbursement this Period

10128.15

Purpose of Disbursement

RV rental US Sen - Coleman

Candidate Name

COLEMAN

Category/Type

Office Sought:

House

Senate

President

Disbursement For:

2002

Primary

General

Other (specify) ▼

State: MN

District:

Transaction ID: SB21B.6835

Full Name (Last, First, Middle Initial)

B. Capitol Signs

Date of Disbursement

07 / 24 / 2002

Mailing Address

1270 Eagan Industrial Rd

Ste 100

City

State

Zip Code

Eagan

MN

55121

Amount of Each Disbursement this Period

1908.98

Purpose of Disbursement

Bump. Sign. US Senate Coleman MN

Candidate Name

COLEMAN

Category/Type

Office Sought:

House

Senate

President

Disbursement For:

2002

Primary

General

Other (specify) ▼

State: MN

District:

Transaction ID: SB21B.6828

Full Name (Last, First, Middle Initial)

C. CLP Graphics

Date of Disbursement

07 / 25 / 2002

Mailing Address

1169 124th Ln NE

City

State

Zip Code

Blaine

MN

55434

Amount of Each Disbursement this Period

56350.00

Purpose of Disbursement

Signs

Candidate Name

COLEMAN

Category/Type

Office Sought:

House

Senate

President

Disbursement For:

2002

Primary

General

Other (specify) ▼

State: MN

District:

Transaction ID: SB21B.6803

SUBTOTAL of Disbursements This Page (optional)

68387.11

TOTAL This Period (last page this line number only)

**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)				PAGE 42 / 192			
	<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28
	<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 29	<input type="checkbox"/> 29

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NAME OF COMMITTEE (in Full)  
REPUBLICAN PARTY OF MINNESOTA

**A.**

Full Name (Last, First, Middle Initial) CLP Graphics		Date of Disbursement 08 / 14 / 2002	
Mailing Address 1168 524th Ln NE		Amount of Each Disbursement this Period 27968.00	
City Blaine	State MN	Zip Code 55434	Category/ Type
Purpose of Disbursement Citizen Law Signs		Disbursement For: 2002 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify) ▼	
Candidate Name COLEMAN, NORM			
Office Sought: House <input checked="" type="checkbox"/> Senate President	State: MN	District: 00	Transaction ID: SB21B.7250

**B.**

Full Name (Last, First, Middle Initial) Spartan Promotional Group		Date of Disbursement 08 / 18 / 2002	
Mailing Address 711 Hale Ave. North		Amount of Each Disbursement this Period 2500.00	
City Oakdale	State MN	Zip Code 55128	Category/ Type
Purpose of Disbursement Buttons & Fribar		Disbursement For: 2002 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify) ▼	
Candidate Name COLEMAN, NORM			
Office Sought: House <input checked="" type="checkbox"/> Senate President	State: MN	District: 30	Transaction ID: SB21B.7280

**C.**

SUBTOTAL of Disbursements This Page (optional)	30468.00
TOTAL FOR LINE (SEE PAGE THIS LINE NUMBER ON)	30468.00

11/11/2023 10:00:00 AM