



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

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

OCT 18 1995

Identification Number: C00027466

Reference: March Monthly Report (2/1/95-2/28/95)

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:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). In

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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 receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a 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 concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-The identification of each contributor, including the person's occupation and name of employer, 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 lacking a contributor's occupation and name of employer.

Note: If your committee has made attempts, either by a written request or by an oral request documented in writing to obtain this information from each contributor, your committee may have exercised "best efforts." Under revised 11 CFR 104.7(b), such effort shall consist of an initial clear and conspicuous request for the name, mailing address, occupation, and name of employer of each individual who has contributed over \$200 in the calendar year which informs the contributor that the reporting of such information is required by law. If necessary, your committee must make a written follow-up request or an oral follow-up request documented in writing, within thirty days with no additional solicitation. Subsequently, the committee should report any changes provided by the contributor or any additional information which is in the committee's records. If you believe that your committee satisfies the "best efforts" provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contribution information. Clarification regarding "best efforts" should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. 11 CFR §104.3(a)(4)(1)

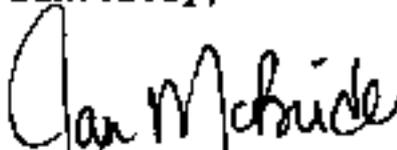
-Line 22 of your report discloses a refund of \$14,000 from the Missouri Republican State Committee. If this refund was issued from the account of the Missouri Republican State Committee, it should be properly reported on Schedule A, supporting Line 12 of the Detailed Summary Page. Please amend your report to clarify this discrepancy.

-Schedule A, supporting Line 11(a)(1) of the Detailed Summary Page, discloses a receipt of \$1,000 from your committee's non-federal account. Although it is described as a redesignation, please provide further clarifying information about this receipt.

-Schedule B, supporting Line 29 of the Detailed Summary Page, discloses two disbursements of \$1,000 each to your committee's non-federal account. Please amend your report to clarify the purpose of these transfers and disclose whether these transactions represent corrective action taken by the committee.

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,



Jan McBride  
Reports Analyst  
Reports Analysis Division

95030036

SCHEDULE A

ITEMIZED RECEIPTS  
PERIOD: FROM 02/01/95 TO 02/28/95

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.

National Republican Senatorial Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/OCCUPATION	DATE	AMOUNT
Florida Rock Industries, Inc. Good Govt Cmta 155 East 21 Street Post Office Box 4667 Jacksonville, FL 32201	N/A N/A	02/16/95	\$1,000.00
AGGREGATE YEAR TO DATE:			\$1000.00
Holland E Knight Cmta for Effective Govt 2100 Pennsylvania Avenue, NW Suite 403 Washington, DC 20037	N/A N/A	02/21/95	\$5,000.00
AGGREGATE YEAR TO DATE:			\$5000.00
McJermott, Hill & Emery PAC 1200 13th Street, NW, 8th Floor Washington, DC 20035	N/A N/A	02/27/95	\$1,000.00
AGGREGATE YEAR TO DATE:			\$1000.00
NBD Good Citizenship Committee 30x 116A Detroit, MI 48232	N/A N/A	02/08/95	\$15,000.00
AGGREGATE YEAR TO DATE:			\$15000.00
Post Harwick/PAC Post Office Box 16256 Washington, DC 20036	N/A N/A	02/16/95	\$15,000.00
AGGREGATE YEAR TO DATE:			\$15000.00
The Freedom Fund 1301 McKinney, 51st Floor Houston, TX 77010	N/A N/A	02/10/95	\$5,000.00
AGGREGATE YEAR TO DATE:			\$5000.00
VIAPAC 1501 M Street, NW, Suite 1103 Washington, DC 20005	N/A N/A	02/28/95	\$15,000.00
AGGREGATE YEAR TO DATE:			\$15000.00

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