

**NATIONAL
RESTAURANT
ASSOCIATION**

1209 Seventeenth Street NW

Washington DC 20036-3097

Toll-free: (800) 424-5156

Local: (202) 331-5960

Fax: (202) 978-5274

Web site: www.restaurant.org

RECEIVED
FEC MAIL ROOM

2001 JUN 11 P 5:05

**POLITICAL ACTION
COMMITTEE**

June 8, 2001

Donald L. Averett
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Amended 30 Day Post-General Report

Dear Mr. Averett:

I am in receipt of your letter dated May 30, 2001 with respect to the National Restaurant Association Political Action Committee (NRA PAC) Amended 30 Day Post-General Report. You indicate that the Committee should either transfer out or refund a contribution from the Hawaii Restaurant Association itemized in that report. In fact, the Committee refunded the contribution to the Hawaii Restaurant Association on January 9, 2001, and itemized the refund on Schedule B for line 28 of the NRA PAC's February 20, 2001 Monthly Report. A copy of the refund check is enclosed.

Sincerely,



R. Lee Culpepper
Treasurer

RESTAURANT ASSOCIATION POLITICAL ACTION COMMITTEE

STUB NO. 011668

CLUB REF NO	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN	NET CHECK AMOUNT
2807 HAWAII	12/13/00	2200.00	2200.00	0.00	2,200.00

DC 1001 IS PRINTED ON 100% RECYCLED PAPER. AMOUNTS PRINTED FROM ORIGINAL IN RESTAURANT ASSOCIATION



POLITICAL ACTION COMMITTEE
 1200 SEVENTEENTH STREET, NW
 WASHINGTON, DC 20036-3087
 (202) 331-5800

CRESTAR BANK N.A.
 WASHINGTON, DC
 15-58540

GENERAL ACCOUNT

CHECK NO. 011668

CHECK DATE
 01/09/01

CHECK NO. | CHECK AMOUNT
 011668 | *****2200.00

PAY Two Thousand Two Hundred and 00/100 Dollars

TO THE ORDER OF
 HAWAII RESTAURANT ASSOCIATION
 1164 BISHOP STREET, SUITE 905
 HONOLULU, HI 96813

Margale

Barbara J. White

⑆011668⑆ ⑆054000522⑆ 206664079⑆



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEC MAIL ROOM
2004 JUN 11 P 5 06
RQ-2

R. Lee Culpepper, Treasurer
National Restaurant Association Political
Action Committee
1200 17th Street, NW
Washington, DC 20036

MAY 30 2001

Identification Number: C00003764

Reference: Amended 30 Day Post-General Report (10/19/00-11/27/00), dated
1/31/01

Dear Mr. Culpepper:

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

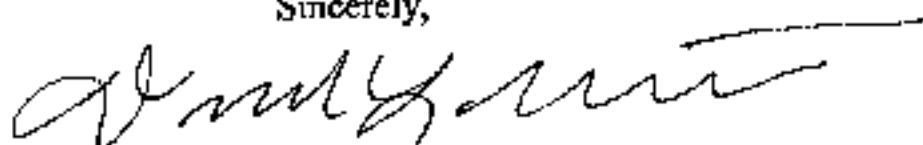
that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing 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.

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,



Donald L. Avcrett
Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 1 OF 1
FOR LINE NUMBER 11 c

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)
National Restaurant Association Political Action Committee

A. Full Name, Mailing Address and ZIP Code Tricon PAC PO Box 32220 Louisville, KY 40232-2220	Name of Employer Occupation Aggregate Year-to-Date > 6 500.00	Date (month, day, year) 11/06/00	Amount of Each Receipt this Period 500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
B. Full Name, Mailing Address and ZIP Code Coca Cola NPCGG Committee Post Office Drawer 1734 Atlanta, GA 30301	Name of Employer Occupation Aggregate Year-to-Date > \$ 1,000.00	Date (month, day, year) 11/07/00	Amount of Each Receipt this Period 1,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
C. Full Name, Mailing Address and ZIP Code Hawaii Restaurant Association 1164 Bishop Street Suite 905 Honolulu, HI 96813	Name of Employer Occupation Aggregate Year-to-Date > \$ 2,200.00	Date (month, day, year) 11/07/00	Amount of Each Receipt this Period 2,200.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
D. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
E. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
F. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
G. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			


Handwritten initials

SUBTOTAL of Receipts This Page (optional)	3,700.00
TOTAL This Period (see page this line number only)	3,700.00

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.

<input checked="" type="checkbox"/> Hand Delivered	Date of Receipt 6-11-01
<input type="checkbox"/> First Class Mail	POSTMARKED
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED (R/C)
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
 PREPARER	6-12-01 DATE PREPARED