FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Edward Grieb, Treasurer
Action Fund of Lehman Brothers Holdings Inc.
200 Vesey Street, 11th Floor
New York, NY 10285

DEC 5 2001

Identification Number: C00127670

Reference: April Monthly Report (3/1/01-3/31/01)

Dear Mr. Grieb:

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 B of your report (pertinent portion(s) attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a national political party in excess of $15,000 in a calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an excessive contribution, you must notify the recipient and request a refund of the amount in excess of $15,000. The refund of the excessive amount must be made within sixty (60) days of receipt of the contribution.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund 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.

Although the Commission may take further legal action concerning the

excessive contribution(s), prompt action in obtaining a refund will be taken into consideration.

A response or 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 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,

Alice Kang
Reports Analyst
Report Analysis Division

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

FOR LINE NUMBER 23

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)
Action Fund of Lehman Brothers Holdings Inc.

Full Name, Mailing Address, and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Enzi for US Senate P.O. Box 2775 Cody WY 82414	Contribution made to Non-affiliated (Senate - WY -) Disbursement for: [X] Primary [ ] General [ ] Other (specify) :	03/07/2001	1000.00
Natl Rep Sen Cmte (NRSC) 425 Second St. NE Washington DC 20002	Contribution made to Non-affiliated (- DC -) Disbursement for: [ ] Primary [ ] General [X] Other (specify) : Not Applicable	03/12/2001	15000.00
Friends of Carolyn McCarthy 151 Linden Rd. Mineola NY 11501	Contribution made to Non-affiliated (House - NY - 4) Disbursement for: [X] Primary [ ] General [ ] Other (specify) :	03/12/2001	1000.00
Castle Campaign Fund P.O. Box 133 Wilmington DE 19899	Contribution made to Non-affiliated (House - DE - 1) Disbursement for: [X] Primary [ ] General [ ] Other (specify) :	03/12/2001	500.00
Cmte Re-Elect Velazquez 12329 Needlepine Terrace Silver Spring MD 20904	Contribution made to Non-affiliated (House - NY - 12) Disbursement for: [X] Primary [ ] General [ ] Other (specify) :	03/12/2001	1000.00
Anna Eshoo for Congress 555 Capitol Mall #1425 Sacramento CA 95814	Contribution made to Non-affiliated (House - CA - 14) Disbursement for: [X] Primary [ ] General [ ] Other (specify) :	03/14/2001	500.00
Tim Johnson for South Dakota P.O. Box 1859 Sioux Falls SD 57101	Contribution made to Non-affiliated (Senate - SD -) Disbursement for: [X] Primary [ ] General [ ] Other (specify) :	03/27/2001	1000.00
Friends of Phil Gramm P.O. Box 801329 Dallas TX 75380	Contribution made to Non-affiliated (Senate - TX -) Disbursement for: [X] Primary [ ] General [ ] Other (specify) :	03/27/2001	1000.00
Richard E. Neal for Congress Cmte 76 Magnolia Terrace Springfield MA 01108	Contribution made to Non-affiliated (House - MA - 2) Disbursement for: [X] Primary [ ] General [ ] Other (specify) :	03/27/2001	500.00

SUBTOTALS of Disbursements This Page (Optional) .....

TOTALS This Period (last page this line number only) **21500.00**

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

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

FOR LINE NUMBER: (check only one)
☐ 21b ☐ 22 ☒ 23 ☐ 24 ☐ 25
☐ 26 ☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29

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NAME OF COMMITTEE (In Full)
Peabody Political Action Committee

A.
Full Name (Last, First, Middle Initial)
National Republican Senatorial Committee

Mailing Address
Ronald Reagan Republican Center 425 2nd Street, N.E.

City: Washington State: DC Zip Code: 20002

Purpose of Disbursement
2001 Natl. Party Cmte-Federal Acct.US,R

Candidate Name
REPUBLICAN PARTY OF KENTUCKY

Category/Type

Office Sought: House / Senate / President
State: District:

Disbursement For: Primary / General / X Other (specify) ▼
Other

Date of Disbursement: M 03 / D 06 / Y 2001

Amount of Each Disbursement this Period: 5000.00

Transaction ID: SB23.10914

K

B.
Full Name (Last, First, Middle Initial)
NELSON 2000

Mailing Address
1915 N. 121st Street SUITE B

City: OMAHA State: NE Zip Code: 68154

Purpose of Disbursement
Contribution - General Debt Retirement

Candidate Name

Category/Type

Office Sought: House / X Senate / President
State: NE District: 00

Disbursement For: Primary / General / X Other (specify) ▼
Other

Date of Disbursement: M 03 / D 06 / Y 2001

Amount of Each Disbursement this Period: 1000.00

Transaction ID: SB23.10912

C.
Full Name (Last, First, Middle Initial)
REPUBLICAN PARTY OF KENTUCKY

Mailing Address
PO BOX 1088

City: FRANKFORT State: KY Zip Code: 40602

Purpose of Disbursement
3/31/01 Event

Candidate Name

Category/Type

Office Sought: House / Senate / President
State: District:

Disbursement For: Primary / General / X Other (specify) ▼
Other

Date of Disbursement: M 03 / D 26 / Y 2001

Amount of Each Disbursement this Period: 2500.00

Transaction ID: SB23.10919

SUBTOTAL of Disbursements This Page (optional) ▶ 8500.00

TOTAL This Period (last page this line number only) ▶