

RECEIVED  
FEC MAIL  
OPERATIONS CENTER

**ROBINS KAPLAN PAC**  
**1801 K Street, N.W. - Suite 1200**  
**Washington, D.C. 20006**

2002 NOV -7 P 3 50

November 7, 2002

Via Messenger

Ms. Alissa V. Sagri  
 Campaign Finance Analyst  
 Reports Analysis Division  
 Federal Election Commission  
 999 E Street, N.W.  
 Washington, D.C. 20463

Re: **Amendment of July Quarterly Report (4/1/02-6/30/02)**

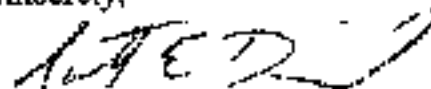
Dear Ms. Sagri:

Thank you for taking the time to speak with me yesterday regarding the details of your October 23, 2002 letter to our PAC. I have today electronically filed the amendment to our July 2002 quarterly report which corrects the clerical errors for Schedule B and which should now reveal all itemized entries on lines 11(a) and 21(b) for administrative expenses. I have also sent a letter to Senator Harkin's campaign committee requesting a refund of the primary contribution that was inadvertently submitted after the date of Iowa's primary. (See enclosed letter to Theresa Kehoe, Treasurer, Citizens for Harkin).

As I informed you during our telephone call, the PAC has always reported the administrative costs by breaking them out among all of the partners of Robins, Kaplan, Miller & Ciresi L.L.P. Given the number of partners, and the relative small administrative costs, these in-kind contributions often remain below the \$200.00 itemization threshold. At your suggestion, however, in amending this quarterly report I made the necessary modifications to the in-kind entries for lines 11(a) and 21(b) so that all entries are itemized even if below the threshold. As you will see, however, this greatly lengthens the report. While we are happy to do this, I would like to discuss further with you the options available to the PAC in reporting these administrative costs which, if appropriate, might cut down on the amount of paperwork that we have to generate and you have to review for each filing.

Finally, in the process of amending this report, it will be necessary to amend our October 2002 quarterly report. I will file that report as soon as possible next week. In the meantime, if you have any questions regarding the July 2002 amended filing, please call me at 202-736-2611.

Sincerely,



Scott E. Diamond  
 Assistant Treasurer

Enclosure

**ROBINS KAPLAN PAC**  
**1801 K Street, N.W. - Suite 1200**  
**Washington, D.C. 20006**

November 6, 2002

Via Certified Mail

Ms. Theresa L. Kehoe  
Treasurer  
Citizens for Harkin  
426 C Street  
(Rear Building)  
Washington, D.C. 20002

Re: **Request for Refund**

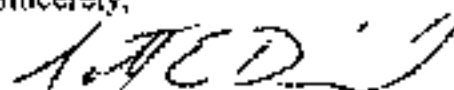
Dear Ms. Kehoe:

The Federal Election Commission has notified our PAC that one of our contributions to Senator Harkin's campaign committee constitutes an excessive contribution. (See enclosed letter dated October 23, 2002). The reports analyst assigned to our PAC has stated that our contribution of \$2,500.00 on June 24, 2002 (see enclosed copy of check) constitutes an excessive contribution as it was designated for the primary election which had already occurred on June 4, 2002. This contribution had indeed been intended for the Senator's primary election. Unfortunately, the Robins, Kaplan, Miller & Ciresi L.L.P. attorney who requested that the contribution be made failed to inform us of the primary date, and we did not independently check that date. We sincerely apologize for this inadvertent oversight.

The contribution is indeed excessive for the general election cycle given the fact that our PAC on September 25, 2002 contributed the full allowable amount of \$5,000.00 to the Senator's campaign. Therefore, we must request a refund of this amount and, accordingly, we will need to notify the Commission in our next quarterly report of this refund from your committee.

We apologize for any inconvenience this may cause. Should you have any questions about this matter, please do not hesitate to call me at 202-736-2611.

Sincerely,



Scott E. Diamond  
Assistant Treasurer

Enclosures

cc: Citizens for Harkin  
P.O. Box 811  
Des Moines, Iowa 50304

Ms. Alissa V. Sagri  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

2012-03-17 09:03:03



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Harold E. Mesirov, Treasurer  
Robins Kaplan PAC  
1801 K Street, NW, Suite 1200  
Washington, DC 20006

OCT 23 2002

Identification Number: C00275909

Reference: July Quarterly Report (4/1/02-6/30/02)

Dear Mr. Mesirov:

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 supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the 2002 Primary election; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

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

If you have made an impermissible contribution, you must request a refund 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.

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

2002 OCT 23 14:58:54

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

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

**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 105 / 112	
	<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" 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)  
Robins Kaplan PAC

Full Name (Last, First, Middle Initial) <b>A. ALASKANS FOR DON YOUNG</b>			Date of Disbursement 05 / 08 / 2002		
Mailing Address P.O. BOX 100298			Amount of Each Disbursement this Period 1000.00		
City ANCHORAGE		State AK	Zip Code 99510		Category/ Type
Purpose of Disbursement Campaign Contribution			Candidate Name		
Office Sought: X House Senate President	Disbursement For: X Primary Other (specify) ▼		2002 General		Transaction ID: SB23.5486
State: AK	District: 00				

Full Name (Last, First, Middle Initial) <b>B. Citizens for Harkin</b>			Date of Disbursement 06 / 24 / 2002		
Mailing Address P.O. Box 811			Amount of Each Disbursement this Period 2500.00		
City Des Moines		State IA	Zip Code 50304		Category/ Type <i>IA Primary 6/4/02</i>
Purpose of Disbursement Campaign Contribution			Candidate Name		
Office Sought: House X Senate President	Disbursement For: X Primary Other (specify) ▼		2002 General		Transaction ID: SB23.5501
State: IA	District:				

Full Name (Last, First, Middle Initial) <b>C. Democratic Congressional Campaign Comm.</b>			Date of Disbursement 04 / 08 / 2002		
Mailing Address 430 South Capitol Street			Amount of Each Disbursement this Period 7500.00		
City Washington		State DC	Zip Code 20003		Category/ Type
Purpose of Disbursement Contribution to Federal Account			Candidate Name		
Office Sought: House Senate President	Disbursement For: X Primary Other (specify) ▼		2002 General		Transaction ID: SB23.5482
State:	District:				

SUBTOTAL of Disbursements This Page (optional)	11000.00
TOTAL This Period (last page this line number only)	

1196

35-1541540

DATE June 24, 2002

\$ 2,500.00

DOLLARS

ROBINS, KAPLAN P.A.C.  
1801 K ST. NW SUITE #1200  
WASHINGTON, DC 20006

PAY TO THE ORDER OF Citizens for Herkin

THE SUM 2500.00 DOLLARS

BB&T

1801 K STREET NORTHWEST  
WASHINGTON, DC 20006

FOR 6/24 Downey event

*Handwritten signature: H. S. Dill*

#001196# 405400154715160012627#

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 <i>11-7-02</i>
<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	
<i>Jal</i> PREPARER		<i>11-7-02</i> DATE PREPARED