



**NEBRASKA REPUBLICAN PARTY**

May 23, 1997  
Marty Simpson, Chairman

RECEIVED  
FEDERAL ELECTION  
COMMISSION MAIL ROOM

May 27 1 45 PM '97

252

MEMO TO JOHN D. GIBSON  
FEC

FROM: BETH SMITH  
NEBRASKA REPUBLICAN PARTY  
#C00032334

RE: May 8, 1997 Letter on Amended 30 Day Post-General Report and Year End Report

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To further explain the expenditures which the FEC questioned, the pieces we paid for were brochures and met the restrictions associated with a State Party producing campaign material. The following points further explain the brochures:

- The brochures were done for the General Election.
- The Nebraska Republican Party was completely responsible for the payment of each piece.
- Funds used to pay for the pieces were raised by the State Party under the rules of the FECA, and deposited in a special "Victory '96 Federal Account". Transfers from the National Party were never deposited into this special account. No funds were earmarked for a specific candidate.
- A substantial volunteer effort enabled us to complete these projects.
- The mailing list came from the Nebraska Republican Party.
- Our disclaimer appeared on all of the pieces.

I hope this clarifies your questions.



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

May 8, 1997

Bob Bennie, Treasurer  
Nebraska Republican Federal  
Campaign Committee  
421 S. 9th Street, Suite 233  
Lincoln, NE 68508

Identification Number: C00032334

Reference: Amended 30 Day Post-General (10/17/96-11/25/96 received 1/30/97)  
and Year End (11/26/96-12/31/96) Reports

Dear Mr. Bennie:

On April 9, 1997 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your April 22, 1997 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-You state that the mass mailing expenditures on Schedule B were "[v]olunteer [m]ass [m]ailings and treated as non-attributable activity." Please note that four conditions must be met for such activity to be considered exempt: the names of at least three candidates running for office appear on the mailing, no public advertising may be used though it may be distributed by direct mail, the portion allocable to Federal candidates is paid from permissible funds, and the identification of each candidate is limited (i.e., no biographical data, party philosophy or issues statements may be included) (see 11 CFR 100.7(b)(9)).

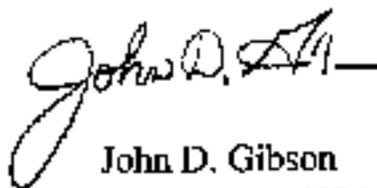
Four expenditures totalling \$62,000 are disclosed on these reports with the purpose as "[m]ass mailing for U.S. Senate race - NE" (pertinent portions attached). It does not appear that these expenditures would qualify as exempt activity; instead, it appears that they would be either in-kind contributions or coordinated party expenditures on behalf of the 1996

Senatorial candidate. Please amend your reports to properly disclose these expenditures.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Jennifer Wall on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,



John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

2025 RELEASE UNDER E.O. 14176

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.

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*JLS*

PREPARER

5-28-97

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