



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 9, 2013

STAN HUCKABY, TREASURER
NATIONAL REPUBLICAN SENATORIAL
COMMITTEE
425 SECOND STREET NE .
WASHINGTON, DC 20002

Response Due Date
06/13/2013

IDENTIFICATION NUMBER: C00027466

REFERENCE: AMENDED 30 DAY POST-GENERAL REPORT (10/18/2012 -
11/26/2012), RECEIVED 01/17/2013

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 6 item(s):

1. Schedule A of your report (see attached) discloses a contribution from an individual(s) who have a mailing address outside of the United States of America. Please be advised that 2 U.S.C. §441e(a) and 11 CFR §110.20 prohibit foreign nationals from making contributions in connection with any election for political office or in connection with any primary election, convention, or caucus held to select candidates for any political office.

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

If you have received a contribution from a foreign national, you must refund the impermissible contribution to the donor in accordance with 11 CFR §103.3(b). Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the refund. In addition, any refunds should be disclosed on Schedule B supporting Line 28 of the report during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action on your part to refund or

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provide clarifying information concerning these contributions will be taken into consideration.

2. Schedule B of your report discloses reimbursements to staff for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by staff to any one vendor that make up the reimbursement may have to be itemized. For example, if the related payments to any one vendor aggregate in excess of \$200 for the calendar year, the staff advance payment to the vendor must also be itemized in a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and detailed purpose of the advance. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must indicate so in an amendment to this report. Please amend your report to include the missing or clarifying information. See Advisory Opinion 1996-20 for additional clarification. (11 CFR § 104.9)

3. Schedule E of your report indicates that your committee may have failed to timely file one or more of the required 24 hour report(s) regarding "last minute" independent expenditures (see attached). A political committee must file a 24 hour report with the Federal Election Commission as specified in 11 CFR §104.4(c), within 24 hours of any independent expenditures of \$1,000 or more with respect to a given election, made between two and twenty days before an election. The report must be received by the Commission by 11:59 p.m. on the day following the date on which independent expenditures that aggregate \$1,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. (11 CFR §104.3(b))

4. Schedule F of your report discloses the Aggregate General Election Expenditure(s) for "Richard Earl Mourdock" to be \$874,160.00 and "Tommy George Thompson" to be \$796,657.00. However, FEC calculations disclose these amount(s) to be \$857,402.20 and \$796,617.00, respectively. Please amend your report to clarify this discrepancy. (2 U.S.C. § 434(b)(4) and 11 CFR §104.3(b)(3)(viii))

5. Schedule F supporting Line 25 of your report discloses coordinated expenditures on behalf of "Jeffry Lane Flake," "Connie Mack," "Charles E.

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Summers Jr.," "Dennis Ray Rehberg," "Richard Alan Berg," "Dean A. Heller," "Joshua A. Mandel," "George F. Allen," "Tommy George Thompson," "Debra Strobel Fischer" and "Richard Earl Mourdock," which appears to have been made after the general election date. Please be advised that if a service is provided or a communication is aired in one reporting period and the payment is made in a later reporting period, the coordinated expenditure should be reported as a memo entry on Schedule F when the service is provided or the communication is publicly disseminated or distributed, and on a Schedule D if it is a reportable debt under 11 CFR §104.11. When the payment for the coordinated expenditure is made, the report should show a payment on Schedule F and the same payment on Schedule D, if applicable.

Please amend your report to provide further clarifying information regarding the coordinated expenditures disclosed after the general election date.

6. Schedule F supporting Line 25 of your report discloses payments made to credit card companies for coordinated party expenditures made on behalf of federal candidates. Please be advised that payments made to credit card companies for coordinated party expenditures must identify in memo entries, the original vendors from which you have purchased an item or service, regardless of the amount. Please amend your report by providing the name and mailing address of the original vendor, along with the date, amount and purpose of each payment as required by 11 CFR §104.3(b)(3)(viii) and clearly identify on the Schedule F, which credit card payment each memo entry relates to.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) 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 should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1143.

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Sincerely,

A handwritten signature in black ink that reads "Kaitlin Eger". The signature is written in a cursive style with a large, stylized 'K' and 'E'.

Kaitlin Eger
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

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**Excessive, Prohibited, and Impermissible Contributions
National Republican Senatorial Committee (C00027466)**

Contributions from Possible Foreign Nationals

| Contributor Name | Date | Amount | Report |
|-------------------------|-------------|---------------|--------------------------|
| MR HENRY ZALESKI | 10/21/12 | \$25.00 | 2012 30 Day Post-General |
| MR HENRY ZALESKI | 10/31/12 | \$20.12 | 2012 30 Day Post-General |
| MR HENRY ZALESKI | 11/1/12 | \$25.00 | 2012 30 Day Post-General |
| MR C MOORE BACON | 10/26/12 | \$7,100.00 | 2012 30 Day Post-General |
| MR KARL DASHER | 10/26/12 | \$5,000.00 | 2012 30 Day Post-General |
| MR CHARLES S MONAT | 10/26/12 | \$4,150.00 | 2012 30 Day Post-General |
| MR SANJAY H PATEL | 10/26/12 | \$2,100.00 | 2012 30 Day Post-General |
| MR L BROOKS ENTWISTLE | 11/2/12 | \$4,600.00 | 2012 30 Day Post-General |

Late 24 Hour Report (Schedule E)**National Republican Senatorial Committee (C00027466)**

| Name of Payee | Date | Amount | Candidate | Election | Report Received |
|--------------------------------|-------------|----------------|-----------------------------|-----------------|------------------------|
| STRATEGIC MEDIA SERVICES, INC. | 10/18/12 | \$227,492.72 | JON TESTER | G2012 | 10/25/12 |
| STRATEGIC MEDIA SERVICES, INC. | 10/23/12 | \$1,200.00 | JON TESTER | G2012 | 10/25/12 |
| STRATEGIC MEDIA SERVICES, INC. | 10/23/12 | \$90,221.12 | JON TESTER | G2012 | 10/25/12 |
| STRATEGIC MEDIA SERVICES, INC. | 10/26/12 | \$308,000.00 | JON TESTER | G2012 | 10/31/12 |
| STRATEGIC MEDIA SERVICES, INC. | 10/23/12 | \$225,552.80 | JON TESTER | G2012 | 11/1/12 |
| NEBO MEDIA | 10/18/12 | \$201,962.52 | MARY KATHRYN HEITKAMP | G2012 | 10/25/12 |
| NEBO MEDIA | 10/23/12 | \$1,200.00 | MARY KATHRYN HEITKAMP | G2012 | 10/25/12 |
| NEBO MEDIA | 10/24/12 | \$203,779.10 | MARY KATHRYN HEITKAMP | G2012 | 11/1/12 |
| STRATEGIC MEDIA SERVICES, INC. | 10/26/12 | \$28,700.00 | JOSEPH SIMON DONNELLY SR. | G2012 | 10/31/12 |
| NEBO MEDIA | 10/17/12 | \$520,835.92 | ROCHELLE BERKLEY | G2012 | 10/25/12 |
| NEBO MEDIA | 10/25/12 | \$521,262.72 | ROCHELLE BERKLEY | G2012 | 10/31/12 |
| NEBO MEDIA | 10/31/12 | \$352,000.00 | ROCHELLE BERKLEY | G2012 | 11/2/12 |
| STRATEGIC MEDIA SERVICES, INC. | 10/18/12 | \$910,233.28 | TAMMY SUZANNE GREEN BALDWIN | G2012 | 10/25/12 |
| STRATEGIC MEDIA SERVICES, INC. | 10/23/12 | \$35,245.00 | TAMMY SUZANNE GREEN BALDWIN | G2012 | 10/25/12 |
| STRATEGIC MEDIA SERVICES, INC. | 10/23/12 | \$445,632.00 | TAMMY SUZANNE GREEN BALDWIN | G2012 | 10/25/12 |
| STRATEGIC MEDIA SERVICES, INC. | 10/23/12 | \$1,342,968.88 | TAMMY SUZANNE GREEN BALDWIN | G2012 | 10/31/12 |
| STRATEGIC MEDIA SERVICES, INC. | 10/23/12 | \$1,200.00 | RICHARD HENRY CARMONA | G2012 | 10/25/12 |

Late 24 Hour Report (Schedule E)**National Republican Senatorial Committee (C00027466)**

| Name of Payee | Date | Amount | Candidate | Election | Report Received |
|--------------------------------|-------------|----------------|------------------------|-----------------|------------------------|
| STRATEGIC MEDIA SERVICES, INC. | 10/23/12 | \$1,079,377.97 | RICHARD HENRY CARMONA | G2012 | 10/26/12 |
| STRATEGIC MEDIA SERVICES, INC. | 10/24/12 | \$311,517.00 | RICHARD HENRY CARMONA | G2012 | 10/26/12 |
| STRATEGIC MEDIA SERVICES, INC. | 10/30/12 | \$2,360.00 | RICHARD HENRY CARMONA | G2012 | 10/31/12 |
| STRATEGIC MEDIA SERVICES, INC. | 10/18/12 | \$1,286,199.20 | TIMOTHY MICHAEL Kaine | G2012 | 10/25/12 |
| STRATEGIC MEDIA SERVICES, INC. | 10/23/12 | \$86,658.00 | TIMOTHY MICHAEL Kaine | G2012 | 10/25/12 |
| STRATEGIC MEDIA SERVICES, INC. | 10/24/12 | \$1,414,789.20 | TIMOTHY MICHAEL Kaine | G2012 | 10/31/12 |
| STRATEGIC MEDIA SERVICES, INC. | 10/25/12 | \$21,120.00 | TIMOTHY MICHAEL Kaine | G2012 | 10/31/12 |
| STRATEGIC MEDIA SERVICES, INC. | 10/30/12 | \$879,728.08 | SHERROD CAMPBELL BROWN | G2012 | 10/25/12 |