



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

Robert A. Parrish, Treasurer
Pat Roberts for Senate
P.O. Box 433
Great Bend, KS 67530

AUG 23 2002

Identification Number: C00128876

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

Dear Mr. Parrish:

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 (see attached) discloses one or more contributions which appear to exceed the limit set forth in the Act. You should examine all of your contributions to check for additional excessive contributions. The Committee's procedures for processing contributions should also be reviewed.

No political committee other than a qualified multicandidate committee may make contributions to a candidate for federal office in excess of \$1,000 per election. The Seaboard Corporation PAC did not meet the requirements for qualified multicandidate status as of the date the contribution(s) was made to your committee. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (2 U.S.C. §441a(a) and (f); 11 CFR §110.1(b), (e) and (k))

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

If any contribution(s) you received exceeds the limits, you may have to

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refund the excessive amount. The funds can be retained if within sixty (60) days of receipt, the excessive amount was properly designated for a different election, by obtaining signed written authorization from the contributor(s) pursuant to 11 CFR §110.1(b)(5) or §110.2(b)(5). Unless the forgoing conditions for redesignations are met within 60 days of receipt, the excessive amount must be refunded. See 11 CFR §103.3(b)(1).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any refund and/or any photocopies of letters redesignating the contributions in question. Refunds are reported on Line 20 of the Detailed Summary Page and on a supporting Schedule B of the report covering the period in which they are made. Redesignations are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation is received. (11 CFR §104.8(d)(2), (3) and (4))

The acceptance of excessive contributions is a serious problem. Again, the committee's procedures for processing contributions should be examined and corrected in order to avoid this problem. Although the Commission may take further legal action, prompt action by you to refund or seek redesignation of the excessive amount will be taken into consideration.

-Schedule A of your report discloses one or more contributions which appear to exceed the limits set forth in the Act (see attached). You should examine all of your contributions to check for additional excessive contributions. The Committee's procedures for processing contributions should also be reviewed.

In-kind contributions of equipment, such as computers, with a long-term useful life (e.g., an election cycle, or perhaps longer) are similar to contributions of money and may be designated for elections beyond the next election, provided the contributor designates the contribution as such in writing. A contribution of this type of equipment is distinguishable from in-kind contributions that are used only for one particular election, such as non-exempt contributions of food or beverages consumed by primary election day workers, or printing or mailing costs related to general election events or fundraisers.

The in-kind contribution on your report does not have a "long-term useful life" and constitutes an excessive contribution for the primary election (see Advisory Opinion 1996-29). You must refund the excessive amount to the donor, or seek redesignation and reattribution of the excessive amount from the donor.

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

If any contribution(s) you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained within sixty (60) days of receipt if, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution.

Alternatively, the funds can be retained if within sixty (60) days of receipt, the excessive amount was properly attributed to a different individual, by obtaining signed written authorization from the contributor(s) pursuant to 11 CFR §110.1(b)(5) or §110.2(b)(5). Any request from a donor for a reimbursement must be honored.

If the foregoing conditions for reattributions or redesignations were not met within 60 days of receipt, the excessive amount must be refunded. See 11 CFR §103.3(b)(1).

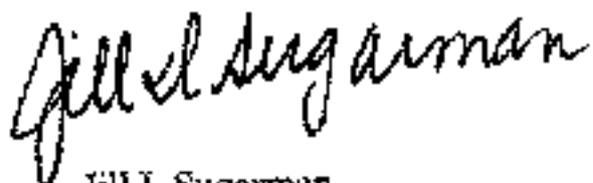
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any refund and/ or any photocopies of letters redesignating or reattributing the contributions in question. Refunds are reported on Line 20 of the Detailed Summary Page and on a supporting Schedule B of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR §104.8(d)(2), (3) and (4))

The acceptance of excessive contributions is a serious problem. Again, the committee's procedures for processing contributions should be examined and corrected in order to avoid this problem. Although the Commission may take further legal action, prompt action by you to refund or seek redesignation and/or reattribution of the excessive amount will be taken into consideration.

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Any amendment or clarification should be filed with the Senate Public Records Office. Please contact the Senate Public Records Office at (202) 224-0322 for instructions on how and where to file an amendment. 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,



Jill I. Sugarman
Senior Reports Analyst
Reports Analysis Division

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**EXCESSIVE
CONTRIBUTIONS ON
THE JULY QUARTERLY REPORT**

**P = Primary Election
G = General Election**

CONTRIBUTOR NAME	DATE	AMOUNT	ELECTION
SEABOARD CORPORATION PAC	06/24/2002	1000	P
SEABOARD CORPORATION PAC	05/21/2001	1000	P
NORTHERN LIGHTS PAC	05/22/2002	1132.61	G

22037711612