



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Stan Huckaby, Treasurer  
National Republican Senatorial Committee  
425 Second Street, NE  
Washington, DC 20002

MAY 7 1997

Identification Number: C00027466

Reference: Year End Report (11/26/96-12/31/96)

Dear Mr. Huckaby:

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:

-On Schedule D of your previous report, you disclosed a debt(s) owed to MOORE INFORMATION. This obligation(s), however, has been omitted from this report. Please amend your report to include this debt(s) on Schedule D and Line 10 of the Summary Page. All debts and obligations must be disclosed until extinguished. 11 CFR §104.11.

-Your report discloses receipts on Schedule D for Line 9 of the Summary Page, which have not been recorded as receipts on Schedule A. Payments of debt owed to the committee must be reflected on Schedule D as well as Schedule A for Line 15 of the Detailed Summary Page. Please amend your report to clarify this apparent discrepancy.

-Please disclose the \$1,000,000 draw on your line of credit, disclosed on Schedule A for Line 13 of the Detailed Summary Page, on Schedule C as a separate loan.

-Schedule H2 of your report indicates that your committee participated in I6LD, I6BE, J6TM, and J6TR activities or events during the reporting period. However, there are no corresponding disbursements reflected on your Schedule H4. If any disbursements were incorrectly reported, you

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should file an amended Schedule H4 with the correct unique identifying code or title.

Note that you need not include activities on Schedule H2 if there are no corresponding payments made for the activity during the reporting period.

-Your **EVENT YEAR-TO-DATE** calculations for fundraising activities/events are incorrect. **EVENT YEAR-TO-DATE** totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. **EVENT YEAR-TO-DATE** totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous **EVENT YEAR-TO-DATE** total for that category or event. This running **EVENT YEAR-TO-DATE** total should be disclosed after each disbursement is listed. Please amend your report by providing the correct fundraising **EVENT YEAR-TO-DATE** totals. 11 CFR § 104.10 (b)(2)

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule H4 of your report to clarify the following description(s): **FULLFILLMENT**. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule B supporting Line 29 (pertinent portion(s) attached) discloses \$11,268.79 in disbursements to **NRSC NON-FEDERAL ACCOUNT** for "Federal admin. portion of non-federal allocable disbursement". You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information regarding these transactions including the date(s) when the original activity was conducted by the non-federal account. In addition, if any of the disbursements disclosed on Schedule B supporting Line 29 were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in-kind contributions on Schedule B supporting Line 23, or as coordinated

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Although the Commission may initiate legal action regarding the activities conducted by your non-federal account, any clarifying information that you can provide will be taken into consideration.

-11 CFR 105.2 states that any political committee which "...supports only candidates for nomination for election or election to the Senate of the United States..." shall file its reports with the Secretary of the Senate (emphasis added). The reports filed by your committee during the 1995-1996 election cycle show contributions being made to candidates for the U.S. House of Representatives and other non-U.S. Senate recipients, in addition to candidates for the U.S. Senate. Therefore, it appears that your committee must begin filing reports directly with the Federal Election Commission and discontinue filing with the Secretary of the Senate.

-Your report includes computer produced formats of Schedules A and D. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

A written response or an 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. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely  
  
Neil Evans  
Reports Analyst  
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

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)

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

ME

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
PSignet Bank 7799 Leesburg Pike Falls Church, VA 22043	Drawdown on Line of Credit	11/27/96	1,000,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date	1	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date	4	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date	6	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date	8	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date	9	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date	9	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date	9	

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SUBTOTAL of Receipts This Page (optional) ..... 1,000,000.00

TOTAL This Period (last page this line number only) ..... 1,000,000.00

<b>Name of Committee (in Full)</b> National Republican Senatorial Committee			
<b>A. Full Name, Mailing Address and ZIP Code of Loan Source</b> Signat Bank 7799 Leesburg Pike Falls Church, VA 22045		<b>Original Amount of Loan</b> 5,700,000.00	<b>Cumulative Payment To Date</b> 300,000.00
<b>Balance Outstanding at Close of This Period</b> 5,400,000.00			
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Interest Rate: <u>Prime + 1/2%</u>	
Term: Date Incurred: <u>9/9/96</u> Date Due: <u>11/1/97</u>		<input checked="" type="checkbox"/> Secured	
Amended: <u>10/01/96</u>			
<b>List All Endorsers or Guarantors (if any) to Item A</b>			
<b>1. Full Name, Mailing Address and ZIP Code</b>		<b>Name of Employer</b>	
		<b>Occupation</b>	
		<b>Amount Guaranteed Outstanding: \$</b>	
<b>2. Full Name, Mailing Address and ZIP Code</b>		<b>Name of Employer</b>	
		<b>Occupation</b>	
		<b>Amount Guaranteed Outstanding: \$</b>	
<b>3. Full Name, Mailing Address and ZIP Code</b>		<b>Name of Employer</b>	
		<b>Occupation</b>	
		<b>Amount Guaranteed Outstanding: \$</b>	
<b>B. Full Name, Mailing Address and ZIP Code of Loan Source</b>		<b>Original Amount of Loan</b>	<b>Cumulative Payment To Date</b>
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			<b>Balance Outstanding at Close of This Period</b>
Term: Date Incurred: _____ Date Due: _____ Interest Rate: <u>5.00%</u>			<input type="checkbox"/> Secured
<b>List All Endorsers or Guarantors (if any) to Item B</b>			
<b>1. Full Name, Mailing Address and ZIP Code</b>		<b>Name of Employer</b>	
		<b>Occupation</b>	
		<b>Amount Guaranteed Outstanding: \$</b>	
<b>2. Full Name, Mailing Address and ZIP Code</b>		<b>Name of Employer</b>	
		<b>Occupation</b>	
		<b>Amount Guaranteed Outstanding: \$</b>	
<b>3. Full Name, Mailing Address and ZIP Code</b>		<b>Name of Employer</b>	
		<b>Occupation</b>	
		<b>Amount Guaranteed Outstanding: \$</b>	
<b>SUBTOTALS This Period This Page (optional)</b> _____			
<b>TOTALS This Period (last page in this line only)</b> _____			<b>5,400,000.00</b>
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

MS

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SCHEDULE B

ITEMIZED DISBURSEMENTS

NAME OF COMMITTEE  
NATIONAL REPUBLICAN SENATORIAL COMMITTEE

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NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
NRSC NON-FEDERAL ACCOUNT 425 SECOND STREET, NE WASHINGTON DC 20002	TRANSFER DISBURSEMENT FOR: LOUIS F. LEEPER	12/05/96	5000.00
NRSC NON-FEDERAL ACCOUNT 425 SECOND STREET, NE WASHINGTON DC 20002	TRANSFER DISBURSEMENT FOR: NRSC - Federal admin. portion of non-federal allocable disbursement	12/05/96	11268.79
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			16,268.79
TOTAL THIS PERIOD			

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