FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Basil A. Paterson, Treasurer
National Leadership PAC
P.O. Box 5577
New York, NY 10027

SEP 2 5 2002

Identification Number: C00302588

Reference: Amended April Quarterly Report (1/1/02-3/31/02), received 6/3/02

Dear Mr. Paterson:

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 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 A of your report (pertinent portion(s) attached) discloses one or more contributions from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible.

To the extent that your committee has received prohibited funds, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited 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 transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

A 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. Electronic filers must file amendments (to include statements, designation 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 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,

Andrea S. Needles

Andrea S. Needles
Senior Reports Analyst
Reports Analysis Division

22037740890

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)
☐ 21b ☐ 22 ☒ 23 ☐ 24 ☐ 25
☐ 26 ☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29

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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 Leadership PAC

A. Full Name (Last, First, Middle Initial)
Karen Thurman

Mailing Address
Thurman for Congress PO Box 5058
City: Inverness State: FL Zip Code: 34450

Purpose of Disbursement
contribution

Candidate Name

Category/Type

Office Sought: X House / Senate / President
State: FL District: 05

Disbursement For: 2002
X Primary / General / Other (specify)

Date of Disbursement: 03/28/2002

Amount of Each Disbursement this Period: 3000.00

Transaction ID: D1040

B. Full Name (Last, First, Middle Initial)
Karen Thurman

Mailing Address
Thurman for Congress PO Box 5058
City: Inverness State: FL Zip Code: 34450

Purpose of Disbursement
contribution

Candidate Name

Category/Type

Office Sought: X House / Senate / President
State: FL District: 05

Disbursement For: 2002
X Primary / General / Other (specify)

Date of Disbursement: 03/28/2002

Amount of Each Disbursement this Period: 1000.00

Transaction ID: D1039

C. Full Name (Last, First, Middle Initial)
Luther for Congress Volunteer Committe

Mailing Address
1399 N. Geneva Avenue Suite 202
City: Oakdale State: MN Zip Code: 55128

Purpose of Disbursement
contribution

Candidate Name

Category/Type

Office Sought: X House / Senate / President
State: MN District: 05

Disbursement For: 2002
X Primary / General / Other (specify)

Date of Disbursement: 03/01/2002

Amount of Each Disbursement this Period: 5000.00

Transaction ID: D1038

SUBTOTAL of Disbursements This Page (optional) ▶ 9000.00

TOTAL This Period (last page this line number only) ▶

FEC Schedule B (Revised 1/2001)

22037740891

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)
[ ] 21b [ ] 22 [X] 23 [ ] 24 [ ] 25
[ ] 26 [ ] 27 [ ] 28a [ ] 28b [ ] 28c [ ] 29

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NAME OF COMMITTEE (In Full)
National Leadership PAC

A.
Full Name (Last, First, Middle Initial): Karen Thurman
Mailing Address: Thurman for Congress, PO Box 5058
City: Inverness State: FL Zip Code: 34450
Purpose of Disbursement: House Candidates
Candidate Name:
Category/Type:
Office Sought: X House / Senate / President
Disbursement For: 2002 X Primary / General / Other (specify)
State: FL District: 06
Date of Disbursement: 11/14/2001
Amount of Each Disbursement this Period: 1000.00
Transaction ID: D856

B.
Full Name (Last, First, Middle Initial): Karen Thurman
Mailing Address: Thurman for Congress, PO Box 5058
City: Inverness State: FL Zip Code: 34450
Purpose of Disbursement: contribution
Candidate Name:
Category/Type:
Office Sought: X House / Senate / President
Disbursement For: 2002 X Primary / General / Other (specify)
State: FL District: 06
Date of Disbursement: 12/21/2001
Amount of Each Disbursement this Period: 1000.00
Transaction ID: D901

C.
Full Name (Last, First, Middle Initial): Phelps for Congress
Mailing Address: 225 Jacobs Road
City: East Eldorado State: IL Zip Code: 62930
Purpose of Disbursement: House Candidates
Candidate Name:
Category/Type:
Office Sought: X House / Senate / President
Disbursement For: 2002 X Primary / General / Other (specify)
State: IL District: 19
Date of Disbursement: 12/21/2001
Amount of Each Disbursement this Period: 1000.00
Transaction ID: D897

SUBTOTAL of Disbursements This Page (optional) ..... ▶ 3000.00

TOTAL This Period (last page this line number only) ..... ▶

22037740892

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)
☐ 21b ☐ 22 ☒ 23 ☐ 24 ☐ 25
☐ 26 ☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29

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NAME OF COMMITTEE (In Full)
National Leadership PAC

A.
Full Name (Last, First, Middle Initial)
Luther for Congress Volunteer Committe

Date of Disbursement
12 / 21 / 2001

Mailing Address
1399 N. Geneva Avenue Suite 202
City: Oakdale State: MN Zip Code: 55128

Amount of Each Disbursement this Period
1000.00

Purpose of Disbursement
contribution

Candidate Name

Category/Type

Office Sought: X House / Senate / President
State: MN District: 08

Disbursement For: 2002
X Primary / General / Other (specify)

Transaction ID: D893

B.
Full Name (Last, First, Middle Initial)
Brian Baird for Congress

Date of Disbursement
11 / 14 / 2001

Mailing Address
PO BOX 5016
City: Vancouver State: WA Zip Code: 98666

Amount of Each Disbursement this Period
1000.00

Purpose of Disbursement
House Candidates

Candidate Name

Category/Type

Office Sought: House / Senate / President
State: District:

Disbursement For: 2002
X Primary / General / Other (specify)

Transaction ID: D951

C.
Full Name (Last, First, Middle Initial)
Brian Baird for Congress

Date of Disbursement
12 / 21 / 2001

Mailing Address
PO BOX 5016
City: Vancouver State: WA Zip Code: 98666

Amount of Each Disbursement this Period
1000.00

Purpose of Disbursement
House Candidates

Candidate Name

Category/Type

Office Sought: House / Senate / President
State: District:

Disbursement For: 2002
X Primary / General / Other (specify)

Transaction ID: D894

SUBTOTAL of Disbursements This Page (optional) ▶ 3000.00

TOTAL This Period (last page this line number only) ▶

FEC Schedule B (Revised 1/2001)

22037740893

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one) PAGE 30 / 57

[X] 11a [ ] 11b [ ] 11c [ ] 12 [ ] 13 [ ] 14 [ ] 15 [ ] 16 [ ] 17

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NAME OF COMMITTEE (In Full)
National Leadership PAC

A. Full Name (Last, First, Middle Initial)
Daniel Rose
Mailing Address
200 Madison Ave.
City: New York State: NY Zip Code: 10016
FEC ID number of contributing federal political committee.
Name of Employer: Rose Associates
Occupation: Real estate
Receipt For: 2002
X Primary General
Other (specify)
Aggregate Year-to-Date: 1000.00

Date of Receipt: 03 / 19 / 2002
Amount of Each Receipt this Period: 1000.00
Transaction ID: C1618

B. Full Name (Last, First, Middle Initial)
Leonard Litwin
Mailing Address
1200 Union Tpke.
City: New Hyde Park State: NY Zip Code: 11040
FEC ID number of contributing federal political committee.
Name of Employer: Glenwood Management
Occupation: President
Receipt For: 2002
X Primary General
Other (specify)
Aggregate Year-to-Date: 500.00

Date of Receipt: 03 / 19 / 2002
Amount of Each Receipt this Period: 500.00
Transaction ID: C1532

C. Full Name (Last, First, Middle Initial)
Barona
Mailing Address
Attn: PAC Director 1095 Barona Rd.
City: Lakeside State: CA Zip Code: 92040
FEC ID number of contributing federal political committee.
Name of Employer:
Occupation:
Receipt For: 2002
X Primary General
Other (specify)
Aggregate Year-to-Date: 5000.00

Date of Receipt: 03 / 31 / 2002
Amount of Each Receipt this Period: 5000.00
Transaction ID: C2239

SUBTOTAL of Receipts This Page (optional) ..... ▶ 8500.00

TOTAL This Period (last page this line number only) ..... ▶