



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

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

NOV 24 1998

Identification Number: C00027466

Reference: September Monthly Report (8/1/98-8/31/98)

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:

-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): Consultant. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund 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 discloses receipts totaling \$5,000 from the 1998 Republican House-Senate, which is a joint fundraising committee affiliated with your committee. The sum of the entries itemized on the memo Schedule A, however, total only \$2,250.

Please be advised that a memo Schedule A must be provided to itemize your committee's share of the gross contributions received through the joint fundraiser. The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the calendar year, and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount. 11 CFR §102.17(e)(8)(i)(B). Please clarify this discrepancy.

-Line 23 of the Detailed Summary Page of your report discloses a total of \$75,855 in contributions to federal candidates. The sum of the entries itemized on Schedule B, however, indicates the total to be \$42,355. This appears to be the result of including certain earmarked contributions in the total. However, the receipt of these earmarked contributions were disclosed on a memo Schedule A, implying that their disbursement would be properly disclosed on a memo Schedule B. Please amend your report to clarify the discrepancy.

-Your reports disclose earmarked contributions to candidates. The memo Schedule B discloses that \$2,000 was disbursed as an earmarked contribution from Paul Davies and Ned Heizer for every \$1,000 received from them on memo Schedule A. For earmarked contributor Raghavendra Vijayanagar, a \$1,000 disbursement was made to Friends of Sen. D'Amato;

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however memo Schedule A does not disclose a corresponding receipt. For earmarked contributor William Morrison Mathews, a \$1,000 disbursement was made to Friends of Senator Nickles; however memo Schedule A does not disclose a corresponding receipt. The memo Schedule A discloses that \$1,000 was received from William Morrison Mathews for Friends of Sen. D'Amato on 8/20/98; however no disbursement was disclosed. Please amend your report to clarify this apparent discrepancy.

-Your reports disclose that your committee has acted as a conduit for earmarked contributions. Proper reporting of earmarked contributions requires that your committee provide on Schedule A, contributor information (name, address and, if applicable, occupation and employer), date of receipt, contribution amount, and designated candidate. Schedule B must include, the name of the designated candidate, (preferably including office sought, name and address of the candidate committee, and election designation, if any) amount of contribution, date the contribution was forwarded, a notation as to how the contribution was forwarded (cash, contributor check, or committee check) and a statement that the conduit's limit was also affected, if applicable. If the earmarked contributions are transmitted by committee check, they must be disclosed on Schedules A and B, supporting lines 11(a)(i) and 23 of the Detailed Summary Page, respectively. If the earmarked contributions are transmitted by contributor check, they must be itemized on Schedules A and B as memo entries. Please amend your report to reflect the proper method(s) for disclosure of earmarked contributions.

-Your committee may create a computerized Memo Schedule for Earmarked Receipts and Disbursements to assist in reporting earmarked contributions. The form you create must be submitted to and approved by the Commission prior to its use. A sample format of this schedule is included.

-Schedule A of your report (pertinent portions attached) discloses an apparent contribution(s) from a corporation(s). 2 U.S.C. §441b(a)) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have received a corporate contribution(s), you must transfer-out the

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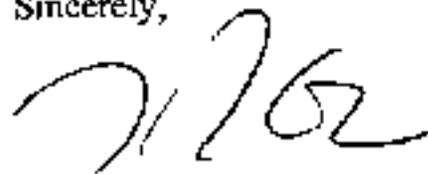
impermissible funds to an account not used to influence federal elections or refund the full amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all transfers-out and refunds should be made within thirty days of the treasurer's receipt of the impermissible funds. In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on 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 a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

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) 694-1130.

Sincerely,



Neil Evans
Reports Analyst
Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

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
 FDC ID No. C00027466

AES

98020194945

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Grassley Committee P.O. Box 6193 Alexandria, VA 22306	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	08/07/98	16,855.00
Simpson for Congress P.O. Box 1561 Boise, ID 83701	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	08/14/98 08/14/98	5,000.00 5,000.00
Inglis for Senate P.O. Box 361 Greenville, NC 29602	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	08/25/98	15,500.00
Citizens for Bunning 1717 Dixie Hwy. Port Wright, KY 41011	Earmarked Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	08/24/98 08/26/98	2,000.00 1,000.00
Earmark contribution from Paul Davies, Jr-\$2000 Allen Bernstein-\$1000	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
Boozman for US Senate P.O. Box 34007 Little Rock, AR 72211	Earmarked contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	08/24/98 08/26/98	2,000.00 1,000.00
Earmark contribution from Paul Davies, Jr-\$2000 Allen Bernstein-\$1000	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
Campbell Victory Fund 1133 Pennsylvania Street Denver, CO 80203	Earmarked Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	08/24/98	1,000.00
Earmark contribution from David Born	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (optional) 49,355.00

TOTAL This Period (last page this line number only)

MEMO SCHEDULE FOR EARMARKED RECEIPTS AND DISBURSEMENTS

Contributions transmitted to Candidate Committee Name (state, district if applicable) in the form of the contributors' check.

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NAME OF COMMITTEE (in Full)

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Dates (month, day, year)	Amount This Period
Michael Chaplin 4 River Road City, State ZIP	American Corporation Occupation vice president	Received: 1/1/97 Transmitted: 1/5/97	\$200.01
Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/>			
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Dates (month, day, year)	
Jane Smith 321 River Street City, State ZIP	Occupation	Received: 1/1/97 Transmitted: 1/6/97	\$200.00
Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/>			
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Dates (month, day, year)	
	Occupation	Received: Transmitted:	
Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/>			
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Dates (month, day, year)	
	Occupation	Received: Transmitted:	
Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/>			
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Dates (month, day, year)	
	Occupation	Received: Transmitted:	
Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/>			
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Dates (month, day, year)	
	Occupation	Received: Transmitted:	
Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/>			
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Dates (month, day, year)	
	Occupation	Received: Transmitted:	
Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/>			
SUBTOTAL of Receipts This Page (optional)			\$400.01
TOTAL This Period (last page only)			\$400.01

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FULL NAME, MAILING ADDRESS AND ZIP CODE	EMPLOYER OCCUPATION	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
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1245 CLEANING SERVICE
299 PARK AVENUE
NEW YORK, NY 10171

INFORMATION REQUESTED

8/12/98

\$10000.00

INFORMATION REQUESTED

AGGREGATE YEAR-TO-DATE \$10000.00

MR. M. PHILLIP ADAMS
4020 E. MADISON STREET, #200
SEATTLE, WA 98112

INFORMATION REQUESTED

8/14/98

\$1000.00

INFORMATION REQUESTED

AGGREGATE YEAR-TO-DATE \$1000.00

MR. C. WEBSTER ABBOTT
1900 INDIAN HEAD ROAD
BALTIMORE, MD 21204-6430

ABBOTT ASSOCIATES INC

8/ 5/98

\$150.00

BUSINESS REALTOR

AGGREGATE YEAR-TO-DATE \$245.00

MR. O. WARREN ABBOTT
3622 KIRKFIELD DR.
FORT WAYNE, IN 46815-5975

RETIRED

8/ 4/98

350.00

8/10/98

\$25.00

8/19/98

\$10.00

8/24/98

\$20.00

AGGREGATE YEAR-TO-DATE \$265.00

MR. E. ABEL
1104 12TH STREET
MORISTO, CA 95123

INFORMATION REQUESTED

8/28/98

\$100.00

C. P. A.

AGGREGATE YEAR-TO-DATE \$400.00

MR. GEORGE ANKLESTEN
SR. 1, BOX 12
MORRIS CITY, NJ 07649-1951

SEMI-RETIRED

8/20/98

\$25.00

AGGREGATE YEAR-TO-DATE \$205.00

SUB TOTAL FOR PAGE

\$11,305.00

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