



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

RQ-2

May 5, 2026

DAVID HUEBNER, TREASURER
HUEBNER FOR NEBRASKA
1302 INDUSTRIAL AVE UNIT 311
NORTH PLATTE, NE 69103

Response Due Date

06/09/2026

IDENTIFICATION NUMBER: C00902767

REFERENCE: 12 DAY PRE-PRIMARY REPORT (04/01/2026 - 04/22/2026)

Dear Treasurer:

This notice 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 discloses one or more contributions that appear to be from a corporation(s) and/or labor organization(s) (see attached). 52 U.S.C. § 30118(a) and 11 CFR § 103.3(b) prohibit the receipt of contributions from corporations and labor organizations unless made from separate segregated funds established by the corporations and labor organizations.

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

If you have received prohibited contributions, you must make a refund within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(1) and (2))

Please inform the Commission of your corrective action promptly by filing an amended report or Miscellaneous Document (Form 99 for electronic filers). If a remedy will be disclosed in a future reporting period, please provide the date and amount of the remedy in your response. The committee should retain records of refunds of the contributions in question. Refunds must be reported on a Schedule B supporting Line 20(a) of the report covering the period in which the refund is made. (11 CFR § 104.8(d)(4))

Although the Commission may take further legal action concerning the

HUEBNER FOR NEBRASKA

Page 2 of 7

acceptance of prohibited contributions, your prompt action to refund the prohibited amount will be taken into consideration.

2. Schedule A of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached).

An individual or a political committee other than an authorized committee or qualified multi-candidate committee may not make a contribution(s) to a candidate for federal office in excess of \$3,500 per election. An authorized committee may not make a contribution(s) to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. 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. (52 U.S.C. § 30116(a) and (f); 11 CFR § 110.1(b), (e) and (k))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information. If any contribution you received exceeds the limits, you may have to refund the excessive amount.

Excessive contributions may be retained if, within 60 days of receipt, the excessive portions are properly redesignated or reattributed. Guidelines for each option are provided below.

For reattributions, excessive contributions from individuals can be retained if, within 60 days of receipt, the excessive amount is properly reattributed to another person. Please note that reattributions only apply to excessive contributions from individuals. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written authorization of a reattribution, signed by each contributor, indicating the amount of the contribution to be attributed to each contributor; or (2) the committee reattributes by presumption the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

For redesignations, the funds can be retained if, within 60 days of receipt, the excessive amount is properly redesignated for a different election. An excessive

HUEBNER FOR NEBRASKA

Page 3 of 7

contribution is considered properly redesignated if (1) the committee obtains signed written authorization from the contributor to redesignate the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election; or (2) your committee redesignates by presumption the excessive portion of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) Please note that you cannot presumptively redesignate an excessive contribution from a multi-candidate committee. Also, a contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

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

Please inform the Commission of your corrective action promptly by filing an amended report or Miscellaneous Document (Form 99 for electronic filers). If a remedy will be disclosed in a future reporting period, please provide the date and amount of the remedy in your response. The committee should retain records of refunds, redesignations, and/or reattributions of the contributions in question. Refunds are reported on Line 20(a), (b), or (c), as applicable, 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))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund, redesignate, and/or reattribute the excessive amount will be taken into consideration.

3. It appears that Schedule A of your report discloses the receipt of anonymous contributions that exceed \$50. Please be advised that federal regulations prohibit an individual from contributing anonymous contributions which, in the aggregate, exceed \$50. If any receipt in question was incompletely or incorrectly reported, you must amend your original report with the clarifying information. If the

HUEBNER FOR NEBRASKA

Page 4 of 7

committee has been in receipt of an anonymous contribution greater than \$50, the excessive amount must be promptly disposed of and may be used for any lawful purpose unrelated to any Federal election, campaign or candidate. Please inform the Commission of your corrective action promptly by filing an amended report or Miscellaneous Document (Form 99 for electronic filers). If a remedy will be disclosed in a future reporting period, please provide the date and amount of the remedy in your response. (11 CFR § 110.4(c)(3))

4. Schedule A of your report discloses one or more contributions that appear to be from a limited liability company(ies) (LLC) (see attached). 11 C.F.R. §110.1(g) allows the receipt of contributions from LLCs providing the LLC is treated as a partnership for tax purposes, and has not elected to be treated as a corporation by the Internal Revenue Service (IRS). Both LLCs that claim corporate status and those that are publicly traded would be treated as corporations for FECA purposes.

Please amend your report to clarify if the LLCs in question are treated as partnerships. If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you must amend your original report with clarifying information. 52 U.S.C. § 30116(f) prohibits a candidate for federal office from accepting contributions from a person in excess of \$3,500 per election. A partnership is included in the definition of "person" under 52 U.S.C. § 30101(11).

The Commission has approved the use of the following sample donor response form for committees that seek and accept contributions from LLCs to affirm to the recipient committee that the LLC is eligible to make the contribution and to satisfy the "best efforts" obligation to obtain contributor information: <https://www.fec.gov/resources/cms-content/documents/mtgdoc-24-53-A.pdf>.

If you have received prohibited contributions, you must make a refund. (11 CFR § 103.3(b)(1)) The refund must be made within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(2))

Please inform the Commission of your corrective action promptly by filing an amended report or Miscellaneous Document (Form 99 for electronic filers). If a remedy will be disclosed in a future reporting period, please provide the date and amount of the remedy in your response. The committee should retain records of refunds of the contributions in question. Refunds must be reported on a Schedule B supporting Line 20(a) of the report covering the period in which the refund was made. (11 CFR § 104.8(d)(4))

HUEBNER FOR NEBRASKA

Page 5 of 7

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, your prompt action to refund the prohibited amount will be taken into consideration.

5. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in an election cycle. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The **following** employer and occupation entries appear on your report and are not considered acceptable: "Agriculture/Agriculture" "Law Enforcement/Law Enforcement" "Medical Field/Medical Field" "Self-Employed/Self-Employed" and "Unknown/Unknown."

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(i)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional

HUEBNER FOR NEBRASKA

Page 6 of 7

information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

6. Schedule A of your report contains entries for contributions made by more than one person. Please be advised that for contributions made by more than one individual in a single written instrument, you must report the amount attributed to each contributor along with all the required contributor information (full name, address, occupation, and employer) in a separate entry for each person. See 11 CFR §§ 100.12, 104.8(a), (b) and (d)(1) and the Campaign Guide for Congressional Candidates for additional clarification.

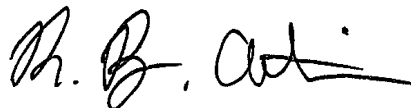
Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions 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. For information about the report review process or specific filing information for your committee type, please visit www.fec.gov/help-candidates-and-committees. For more information about Requests for Additional Information (RFAI), why you received a letter, and how to respond, please visit www.fec.gov/help-candidates-and-committees/request-additional-information. Should you 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) 694-1196.

HUEBNER FOR NEBRASKA

Page 7 of 7

Sincerely,

A handwritten signature in black ink, appearing to read "B. B. Austin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bradley Austin

Sr. Campaign Finance & Reviewing Analyst

**Apparent Excessive, Prohibited, and Impermissible Contributions
Huebner For Nebraska (C00902767)**

Apparent Excessive Contributions from Individuals

Contributor Name	Date	Amount	Election
Huebner, Paul	4/17/25	\$1,000.00	P2026
Huebner, Paul	7/2/25	\$500.00	P2026
Huebner, Paul	9/4/25	\$1,000.00	P2026
Huebner, Paul	2/5/26	\$1,000.00	P2026
Huebner, Paul And Connie	4/3/26	\$200.00	P2026
Huebner, Paul And Connie	4/3/26	\$150.00	P2026
Huebner, Paul And Connie	4/20/26	\$1,000.00	P2026
Schaefer, Mark	2/25/26	\$1,000.00	P2026
Schaefer, Mark And Jo	4/3/26	\$3,500.00	P2026
Wood, Michael	8/21/25	\$500.00	P2026
Wood, Michael	2/19/26	\$1,033.06	P2026
Wood, Michael And Deann	4/1/26	\$5,000.00	P2026

Contributions from Possible Prohibited Entities

Contributor Name	Date	Amount	Election
Callaway Market	4/3/26	\$500.00	P2026
Childears Agri Realty, LLC	4/3/26	\$4,000.00	P2026
Pavel Auction Services LLC	4/13/26	\$500.00	P2026
Zeller Motor Company LLC	4/3/26	\$1,055.00	P2026