



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3271

DATE FILMED 7/13/92 CAMERA NO. 3

CAMERAMAN E.E.S.

92040914151

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: _____

ANALYST: Pat Sheppard

I. COMMITTEE: McConnell Senate Committee '90
(C00193342)
Larry J. Steinberg, Treasurer
P. O. Box 1496
Louisville, KY 40201

II. RELEVANT STATUTE: 2 U.S.C. §441a(f)

III. BACKGROUND:

Receipt of Apparent Excessive Contributions

The McConnell Senate Committee '90 ("the 1990 Committee") has accepted apparent excessive contributions totaling \$26,875 in 1989. These contributions were made by two (2) individuals and fourteen (14) qualified multicandidate political committees. To date, the 1990 Committee has refunded or redesignated \$21,550 of the apparent excessive contributions. The apparent excessive contributions are comprised of:

- (a) contributions totaling \$5,325 from one (1) individual and five (5) qualified multicandidate political committees which aggregate in excess of the 1990 Primary and/or General Election limits; and
- (b) contributions totaling \$21,550 from one (1) individual and eleven (11) qualified multicandidate political committees which were designated for the 1984 General Election, received by the McConnell Senate Committee ("the 1984 Committee") after the date of the election and transferred to the 1990 Committee. All of the contributions transferred were in excess of the 1984 Committee's net debts outstanding.

As of November 26, 1984, twenty (20) days after the November 6, 1984 General Election, the 1984 Committee disclosed \$24,770 cash-on-hand and \$40,084 in outstanding debts and obligations. From November 27, 1984 to April 30, 1986, the 1984 Committee raised \$192,627 in contributions,

22040914152

received \$11,614 in refunds, rebates and other receipts and made \$138,356 in expenditures to wind down the 1984 Committee and to retire any outstanding debts and obligations.

A Reports Analysis Division ("RAD") analyst calculated that the 1984 Committee appears to have received \$90,655 (see attached worksheet) in excess of their necessary debt retirement and winding down costs. Of this amount (\$90,655), \$81,309 was transferred to the 1990 Committee on August 14 and September 18, 1985. Because the 1990 Committee did not provide memorandum Schedules, the RAD analyst used the last in first out method to determine the composition of the transferred funds.

Presented below is a summary of the apparent excessive contributions received, the notices sent, and the responses received. For specific details, please refer to the attached chart and its supporting documents. The chart is an alphabetical listing of all apparent excessive contributions received from individuals and political committees.

A. Possible Violations Discovered During Review

1. 1989 Mid Year Report

Review of the 1990 Committee's report discloses the receipt of apparent excessive contributions totaling \$22,950 from one (1) individual and twelve (12) qualified multicandidate political committees. A Request for Additional Information ("RFAI") was mailed to the 1990 Committee on December 5, 1989 (Attachment 2). The RFAI noted the apparent excessive contributions and requested that the 1990 Committee refund or seek redesignation of the amounts in excess of the \$1,000 or \$5,000 election limits.

The RFAI explained how the 1984 Committee had received contributions in excess of their 1984 net debts and that the contributions were transferred into the 1990 Committee. In addition, the RFAI noted that the contributions should be aggregated with all subsequent contributions received by the 1990 Committee from the contributors whose contributions made up the transfer.

On December 26, 1989, the 1990 Committee responded by letter (Attachment 3). The 1990 Committee stated that they would research the apparent excessive contributions and file an amended report.

On February 1, 1990, a RAD analyst called Mr. Larry J. Steinberg ("the Treasurer") (Attachment 4). The analyst informed the Treasurer that it had been several days since the 1990 Committee told the Commission that they would

92040914153

research the apparent excessive contributions and file an amended report. The analyst noted that the Commission had received the 1990 Committee's 1989 Year End Report and that there were no refunds or redesignations of these contributions disclosed on the report.

The Treasurer stated that he had sixty days from being notified of these apparent excessive contributions to respond and that time did not end until February 5, 1990. The analyst explained that the sixty days runs from the date of the Treasurer's receipt of the contribution, not from the date of notification. The Treasurer said that he would draft a response and call back the next day to see if it was adequate.

On February 2, 1990, the Treasurer called the analyst (Attachment 5). The Treasurer read the proposed response to the analyst and said that he would mail it that day and that the Commission should receive it no later than Monday, February 5, 1990.

On February 7, 1990 the 1990 Committee filed their first response by letter (Attachment 6). The 1990 Committee stated that the apparent excessive contributions had either been refunded, redesignated or would be redesignated; however, the 1990 Committee did not provide the dates of these transactions. The 1990 Committee also stated that they would show the appropriate notification of redesignations and refunds in a future report.

On April 17, 1990, the 1990 Committee filed their second response (Attachment 7). The 1990 Committee stated that they were mailing their 1990 April Quarterly ("1990 Q1") Report. They also reiterated their position that the 1990 Committee had sixty days from notification of the apparent excessive contributions to refund, redesignate or reattribute the contributions. The 1990 Committee stated that given this position they had until April 3, 1990 to obtain the redesignation or to refund some of the apparent excessive amounts. Therefore, some of the corrective actions did not appear in the 1990 Q1 Report but would appear in the 12 Day Pre-Primary Report. The Committee's 1990 Q1 Report discloses only \$12,250 in refunds and redesignations (Attachment 8).

On April 23, 1990, the 1990 Committee filed a third response (Attachment 9). The 1990 Committee listed all of the contribution refunds and or redesignations that will be listed in the 1990 12 Day Pre-Primary Report. This list disclosed that an additional \$9,300 had been refunded. The response also stated that since the 1990 Committee's refund of the contributions, several of the political committees have noted that they have redesignated the apparent excessive

92040914154

amount on their reports. To date, the Committee has not redesignated or refunded two (2) apparent excessive contributions totalling \$1,000.

2. 1989 Year End Report

Review of the 1990 Committee's report discloses the receipt of an apparent excessive contribution for \$125 from one (1) qualified multicandidate political committee. An RFAI was sent to the 1990 Committee on March 7, 1990 (Attachment 10). The RFAI noted on an informational basis the receipt of the apparent excessive contribution and requested that the 1990 Committee refund or seek redesignation of the amount in excess of the \$5,000 per election limit.

On March 26, 1990, the 1990 Committee responded by letter (Attachment 11). The 1990 Committee stated that a redesignation of the apparent excessive amount would be requested. To date, the Commission has not been notified of the redesignation.

B. Additional Possible Violations Discovered During the Preparation of the Referral

Review of the 1990 Committee's 1989 Mid-Year Report discloses the receipt of an additional \$3,800 in apparent excessive contributions. These contributions were made by one (1) individual and two (2) qualified multicandidate political committees. The 1990 Committee has not been notified of these contributions. The 1990 Committee has refunded or redesignated \$2,800 of the apparent excessive amount.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

NONE.

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WORKSHEET

The 1984 Committee

	Total Contributions	Total Expenditures
1984 Year End Report	\$ 49,361	\$ 46,689
1985 Mid-Year Report	142,266	90,318 ^{1/}
Year End Report	1,000	1,347
1986 Termination Rpt	0	2
	<u>\$192,627</u>	<u>\$138,356</u>
11/26/84 cash-on-hand (close of 30 Day-Post General reporting period) 24,770		
	<u>\$217,397</u>	
refunds/rebates & other receipts	11,614	
	<u>\$229,011</u>	- \$138,356 = \$90,655 ^{2/}

1/ This amount does not include \$9,346 that the 1984 Committee disbursed as campaign contributions to the Kentucky Republican Party.

2/ This amount appears in excess of the Committee's necessary winding down costs and debt retirement.

92040914156

NOTES TO THE CHART

1. All brackets were made by the Reports Analyst Division ("RAD") analyst.
2. Apparent excessive contributions of which the 1990 Committee has not been notified are noted on the chart with an asterisk (*). Please note that only \$1,800 of the \$4,000 apparent excessive contribution received on May 15, 1989 from The American and Kentucky Medical Pacs was discovered during the preparation of this referral.

92040914157

04/20/1990

APPARENT EXCESSIVE CONTRIBUTIONS RECEIVED BY THE
MCCORMELL SENATE COMMITTEE '90

NAME	ELECTION	RECEIPTS	EXCESS AMOUNT	RECEIPT DATE	AMOUNT REDESIGNATED	AMOUNT REATTRIBUTED	AMOUNT REFUNDED	ACTION DATE	ATTACHMENT
MCCOY, JOSEPH	PRIMARY	250.00		01/25/1985					A1
	PRIMARY	1000.00	250.00	05/15/1989					A2
	GENERAL				(250.00)			03/31/1990	10
BETH, JACK or (J) E	PRIMARY	1000.00		05/22/1987					B2
	*PRIMARY	1000.00	1000.00	06/08/1989					B1
	GENERAL	1000.00		06/08/1989					B3

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04/20/1990

APPARENT EXCESSIVE CONTRIBUTIONS RECEIVED BY THE
MCCONNELL SENATE COMMITTEE '90

COMMITTEE NAME	ELECTION RECEIPTS	EXCESS RECEIPT AMOUNT	RECEIPT DATE	AMOUNT REDIRIGATED	AMOUNT REATTRIBUTED	AMOUNT REFUNDED	ACTION DATE	ATTACHMENT
A T & T PAC C00185124	PRIMARY	500.00	04/16/1985					C1
	PRIMARY	2500.00	12/19/1988					C2
	PRIMARY	1750.00	06/29/1989					C3
	PRIMARY	750.00	500.00	06/30/1989				C4
	GENERAL				(500.00)		01/05/1990	10
AMERICAN & KENTUCKY MEDICAL PAC C0000422 C00016444	PRIMARY	3200.00	01/30/1985					D1
	PRIMARY	1800.00	01/30/1985					D2
	PRIMARY	1800.00	1000.00	05/15/1989				D3
	*PRIMARY	4000.00	4000.00	05/15/1989				D4
	PRIMARY						(1800.00) 04/03/1990	11
AMERICAN DENTAL PAC C0000729	PRIMARY	5000.00	01/25/1985					E1
	PRIMARY	1000.00	1000.00	05/26/1989				E2
	GENERAL				(5000.00)		01/10/1990	10
ARLAND OIL (PAC) C00075994	PRIMARY	2000.00	01/30/1985					F1
	PRIMARY	5000.00	2000.00	03/10/1989				F2
	PRIMARY						(2000.00) 02/02/1990	10
	GENERAL	5000.00		05/15/1989				F2
ASSOCIATED GEN CONTRACTORS OF AM C00082917	PRIMARY	500.00	02/19/1985					G1
	PRIMARY	5000.00	500.00	04/21/1989				G2
BUILD PAC OF THE NATL ASSO C00000901	PRIMARY	5000.00	01/30/1985					H1
	PRIMARY	5000.00	5000.00	06/29/1989				H2
	GENERAL				(5000.00)		01/03/1990	10

2
4
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04/20/1990

APPARENT EXCESSIVE CONTRIBUTIONS RECEIVED BY THE
MCCONNELL SENATE COMMITTEE '90

COMMITTEE NAME	ELECTION RECEIPTS	EXCESS AMOUNT	RECEIPT DATE	AMOUNT FUNDED	AMOUNT REATTRIBUTED	AMOUNT REFUNDED	ACTION DATE	ATTACHMENT
DAIKINEN, INC C00010104	PRIMARY	1000.00	03/04/1985					I1
	PRIMARY	2000.00	10/11/1988					I2
	PRIMARY	3000.00	1000.00	05/26/1989				I3
	PRIMARY					(1000.00)	02/28/90	I0
	GENERAL	4000.00		05/26/1989				I3
	GENERAL	600.00		10/13/1989				I4
DEALERS ELECTION ACTION CMT C00040990	PRIMARY	500.00	03/04/1985					J1
	PRIMARY	2000.00		02/20/1986				J2
	PRIMARY	2000.00		05/15/1989				J3
	PRIMARY	500.00		06/12/1989				J3
	PRIMARY	500.00	500.00	06/30/1989				J4
	GENERAL				(500.00)		03/31/1990	I0
ICE CREAM & MILK PAC C00120231	PRIMARY	500.00	03/04/1985					K1
	PRIMARY	2000.00		05/26/1989				K2
	PRIMARY	625.00		06/30/1989				K3
	PRIMARY	2000.00	125.00	11/08/1989				K4
FISIL OIL CORP PAC C00095406	PRIMARY	2500.00	04/16/1985					L1
	PRIMARY	5000.00	2500.00	06/30/1989				L2
	PRIMARY					(2500.00)	04/03/1990	I1
NATIONAL FED OF INDEPENDENT BUS C00101105	PRIMARY	1000.00	03/12/1985					M1
	PRIMARY	2000.00		06/29/1989				M2
	PRIMARY	3000.00	1000.00	06/30/1989				M3
	PRIMARY					(1000.00)	02/02/1990	I0
NATIONAL PAC C00150995	PRIMARY	5000.00	05/06/1985					N1
	PRIMARY	5000.00	5000.00	06/12/1989				N2
	PRIMARY					(5000.00)	04/03/1990	I1

0
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04/30/1990

APPARENT EXCESSIVE CONTRIBUTIONS RECEIVED BY THE
MCCORMACK SENATE COMMITTEE '90

COMMITTEE NAME	ELECTION RECEIPTS	EXCESS AMOUNT	RECEIPT DATE	AMOUNT REDESIGNATED	AMOUNT REATTRIBUTED	AMOUNT REFUNDED	ACTION DATE	ATTACHMENT
POL ACTION COMM OF DUN & BRADSTREET C00119669	PRIMARY	500.00	01/30/1985					01
	PRIMARY	1000.00	04/28/1989					02
	PRIMARY	4000.00	500.00	06/12/1989				02
	GENERAL	625.00		06/30/1989				03
FOR GOOD GOVT FUND C00042002	PRIMARY	1000.00	01/25/1985					F1
	*PRIMARY	3000.00	1000.00	03/10/1989				F2
	PRIMARY					(1000.00)	02/28/90	10
	GENERAL	5000.00		03/10/1989				F2

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Any information copied from such Reports or 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)
McConnell Senate Committee

A. Full Name, Mailing Address and ZIP Code
Mr. Joseph McCoy
1081 Dove Run Road
Lexington, KY 40502

Name of Employer

Self

Date (month, day, year)

1-25-85

Amount of Each Receipt This Period

250.00

Receipt For: Primary General
 Other (specify):

Occupation
Coal Operator

Aggregate Year-to-Date-\$ **250.00**

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Aggregate Year-to-Date-\$

Receipt For: Primary General
 Other (specify):

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Aggregate Year-to-Date-\$

Receipt For: Primary General
 Other (specify):

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Aggregate Year-to-Date-\$

Receipt For: Primary General
 Other (specify):

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Aggregate Year-to-Date-\$

Receipt For: Primary General
 Other (specify):

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Aggregate Year-to-Date-\$

Receipt For: Primary General
 Other (specify):

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Aggregate Year-to-Date-\$

Receipt For: Primary General
 Other (specify):

GRAND TOTAL of Receipts This Page (Include)..... **250.00**

TOTAL This Period (See page 6B for number only)..... **\$14,800.00**

A 5 0 2 0 7 0 4 7 0

SCHEDULE A

ITEMIZED RECEIPTS

Any info. copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial purposes other than using name & addr. of a political comm. to solicit from the donor.

Full Name of Committee: McConnell Senate Committee '90

A. Full Name, Address, Zip Employer/Occupation Date Receipts Month

Mr. Jeff Johnson
 625 Highland Drive
 Paducah KY 42001 self
 Doctor 03/31/89 200.00
 04/28/89 50.00

Receipt for: Primary Year-to-Date Total: \$ 250.00

B. Full Name, Address, Zip Employer/Occupation Date Receipts Month

Dr. Harry J. Martin
 501 Elliston Road
 Richmond KY 40475 Self-Employed
 Veterinarian 05/16/89 250.00

Receipt for: Primary Year-to-Date Total: \$ 250.00

C. Full Name, Address, Zip Employer/Occupation Date Receipts Month

Mr. Joseph McCoy
 HC 67, Box 263
 Phelps KY 41553 Self-Employed
 Executive 05/15/89 1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

D. Full Name, Address, Zip Employer/Occupation Date Receipts Month

Mr. Ronald D. Ray
 3317 Hall's Mill Road
 Crestwood KY 40014 Ray and Morris
 Attorney 05/15/89 375.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

E. Full Name, Address, Zip Employer/Occupation Date Receipts Month

Mr. Ronald D. Ray
 3317 Hall's Mill Road
 Crestwood KY 40014 Ray and Morris
 Attorney 05/15/89 625.00

Receipt for: General Year-to-Date Total: \$ 1000.00

F. Full Name, Address, Zip Employer/Occupation Date Receipts Month

Mrs. Robert M. Nash
 Covered Bridge Road
 Prospect KY 40059 Self-Employed
 Homemaker 05/15/89 1000.00

Receipt for: Primary Year-to-Date Total: \$ 2000.00

TOTAL of Receipts This Page 3500

TOTAL This Period

Page 6 of 28 for
1987 McConnell (B)
(Use separate attachments for each
category of the Schedule
Summary Page)

SCHEDULE A

ITEMIZED RECEIPTS

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Name of Committee (in Full)
McConnell Senate Committee '90

A. Full Name, Mailing Address and ZIP Code
Mr. Marshall V. Neuser
1400 Willow
Unit 601
Louisville, KY 40204

Name of Employer
Henry Vogt Machine Co.

Date (month, day, year)
06-12-87

Amount of Each Receipt This Period
125.00

Occupation
Buyer

Receipt For Primary General
 Other (specify):

Aggregate Year-to-Date-\$ **375.00**

B. Full Name, Mailing Address and ZIP Code
Mr. Jack E. Ruth
P.O. Box 368
Grayson, KY 41143

Name of Employer
self

Date (month, day, year)
05-22-87

Amount of Each Receipt This Period
1000.00

Occupation
contractor

Receipt For Primary General
 Other (specify):

Aggregate Year-to-Date-\$ **1000.00**

C. Full Name, Mailing Address and ZIP Code
Doctor Lonnie W. Howerton
23 Southwind Road
Louisville, KY 40207

Name of Employer
self

Date (month, day, year)
06-30-87

Amount of Each Receipt This Period
1000.00

Occupation
doctor

Receipt For Primary General
 Other (specify):

Aggregate Year-to-Date-\$ **1000.00**

D. Full Name, Mailing Address and ZIP Code
Mr. Arthur K. Smith
1010 Alta Circle Road
Louisville, KY 40205

Name of Employer
Smith Furniture

Date (month, day, year)
06-30-87

Amount of Each Receipt This Period
250.00

Occupation
President

Receipt For Primary General
 Other (specify):

Aggregate Year-to-Date-\$ **250.00**

E. Full Name, Mailing Address and ZIP Code
Mr. Larry Addington
2744 J-Lynn Lane
Cattlettsburg, KY 41129

Name of Employer
Addington Engineering

Date (month, day, year)
05-22-87

Amount of Each Receipt This Period
250.00

Occupation
Mining

Receipt For Primary General
 Other (specify):

Aggregate Year-to-Date-\$ **250.00**

F. Full Name, Mailing Address and ZIP Code
Mrs. Ina Brown Johnson
5900 Burlington Avenue
Louisville, KY 40227

Name of Employer
Self

Date (month, day, year)
01-20-87

Amount of Each Receipt This Period
1000.00

Occupation
Homemaker

Receipt For Primary General
 Other (specify):

Aggregate Year-to-Date-\$ **2000.00**

G. Full Name, Mailing Address and ZIP Code
Mr. Bernard M. Trager
Republic Bank & Trust Company
237 South 5th Street
Louisville, KY 40202

Name of Employer
Republic Bank & Trust Co.

Date (month, day, year)
06-26-87

Amount of Each Receipt This Period
1000.00

Occupation
banker

Receipt For Primary General
 Other (specify):

Aggregate Year-to-Date-\$ **1000.00**

SUBTOTAL of Receipts This Page (optional) **465.00**

TOTAL This Page (use this page the line number only)

SCHEDULE A

FINANCED RECEIPTS

Page 124 of 125
 For Line Number 11a

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 Full Name of Committee: McConnell Senate Committee '90

A. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Mr. J. E. Ruth
 304 W. College Street
 Georgetown KY 40324

self-employed
 Contractor 06/08/89 1000.00

Receipt for: General Year-to-Date Total: \$ 2000.00

B. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Mrs. David Ruth
 P. O. Box 1056
 Morehead KY 40351

Information Requested
 Information Requested 08/15/89 500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

C. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Mrs. Malch R. Krauter
 9823 Millon Brook Circle
 Louisville KY 40225

none
 Student 08/15/89 500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

D. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Mrs. Mary D. Rudd
 1400 Willow
 Louisville KY 40204

Self-Employed
 Homemaker 02/10/89 1000.00

Receipt for: Primary Year-to-Date Total: \$ 1500.00

E. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Mrs. Mary D. Rudd
 1400 Willow
 Louisville KY 40204

Self-Employed
 Homemaker 03/15/89 500.00

Receipt for: General Year-to-Date Total: \$ 1500.00

F. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Mr. Burl M. Spurlock
 General Delivery
 Prestonsburg KY 40363

First Commonwealth Bank
 Banker 08/24/89 200.00

Receipt for: Primary Year-to-Date Total: \$ 200.00

SUBTOTAL of Receipts This Page 4000.00

TOTAL This Period

McConnell Senate Committee 1984
 1984 Mid-Year Report
 Attachment # C1

Summary Page 1

Any information copied from such Reports or 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)

McConnell Senate Committee

A. Full Name, Mailing Address and ZIP Code

**Commodity Futures Political Fund
 Chicago Mercantile Exchange
 30 S. Wacker Drive
 Chicago, IL 60606**

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

3-27-85

1000.00

Receipt For: Primary General

Other (specify):

Aggregate Year-to-Date - \$ 2000.00

B. Full Name, Mailing Address and ZIP Code

**Mobil Oil Corporation PAC
 150 East 42nd Street
 New York, NY 10017**

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

4-16-85

2500.00

Receipt For: Primary General

Other (specify):

Aggregate Year-to-Date - \$ 2500.00

C. Full Name, Mailing Address and ZIP Code

**Tenneco Employees Good Govt. Fund
 P. O. Box 2511
 Houston, TX 77001**

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

4-16-85

500.00

Receipt For: Primary General

Other (specify):

Aggregate Year-to-Date - \$ 2500.00

D. Full Name, Mailing Address and ZIP Code

**AT & T PAC
 550 Madison Avenue
 New York, NY 10022**

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

4-16-85

500.00

Receipt For: Primary General

Other (specify):

Aggregate Year-to-Date - \$ 500.00

E. Full Name, Mailing Address and ZIP Code

**Texas Eastern PAC
 P. O. Box 2521
 Houston, TX 77001**

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

4-16-85

1000.00

Receipt For: Primary General

Other (specify):

Aggregate Year-to-Date - \$ 1000.00

F. Full Name, Mailing Address and ZIP Code

**Carolina Power & Light PAC
 P. O. Box 1510
 Raleigh, NC 27602**

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

4-16-85

500.00

Receipt For: Primary General

Other (specify):

Aggregate Year-to-Date - \$ 500.00

G. Full Name, Mailing Address and ZIP Code

**Commodity Futures Political Fund
 Chicago Mercantile Exchange
 30 S. Wacker Drive
 Chicago, IL 60606**

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

5-06-85

1000.00

Receipt For: Primary General

Other (specify):

Aggregate Year-to-Date - \$ 1000.00

GRAND TOTAL of Receipts This Page (includes)

7000.00

TOTAL This Period (See page 64 for number only)

R 5 0 2 0 7 0 7 1 4

SCHEDULE A **ITEMIZED RECEIPTS**

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Full Name of Committee: **McConnell Senate Committee '90**

A. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 Dairyman Inc. KY Com. for Pol. Action
 10140 Linn Station Road
 Louisville KY 40223 PAC 10/11/88 2000.00

Receipt for: Primary Year-to-Date Total: \$ 2000.00

B. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 The Fertilizer Institute PAC
 1015 NW 10th Street
 Washington DC 20036 PAC 10/11/88 1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

C. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 AT&T PAC
 550 Madison Avenue
 New York NY 10022 PAC 12/19/88 2500.00

Receipt for: Primary Year-to-Date Total: \$ 2500.00

D. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 Phelps Dodge Emp. Fund for Good Govt.
 2600 N. Central Avenue
 Phoenix AZ 85004 12/06/88 200.00

Receipt for: Primary Year-to-Date Total: \$ 200.00

E. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 Con/Energy Employees For A Responsible Congress
 Post Office Box 9150
 Cambridge MA 02142 PAC 12/30/88 200.00

Receipt for: Primary Year-to-Date Total: \$ 200.00

F. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 Northern States Power Emp PAC
 414 Nicollet Mall
 Minneapolis MN 55401 PAC 12/30/88 200.00

Receipt for: Primary Year-to-Date Total: \$ 200.00

GUSTOTAL of Receipts This Page 6700.00

TOTAL This Period

EXHIBIT A

ITEMIZED RECEIPTS

Any info. copied from such Reports or Statements may not be sold or used in any person for the purpose of soliciting contrib. or for commercial purposes other than using name & addr. of a political comm to solicit from the same

Full name of Committee: McConnell Senate Committee '90

A. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.
 American Meat Institute PAC
 1700 N Moore Street Ste 00
 Arlington VA 22209 06/27/89 2500.00

Receipt for: Primary Year-to-Date Total: \$ 2500.00

B. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.
 AT&T PAC
 550 Madison Avenue
 New York NY 10022 PAC 06/29/89 1750.00

Receipt for: Primary Year-to-Date Total: \$ 2500.00

C. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.
 American Dental PAC
 1101 NW 14th Street #1100
 Washington DC 20005 05/26/89 1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

D. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.
 Ashland Oil PAC for Empl. (PACE)
 P. O. Box 391
 Ashland KY 41114 03/10/89 5000.00

Receipt for: Primary Year-to-Date Total: \$ 10000.00

E. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.
 Ashland Oil PAC for Empl. (PACE)
 P. O. Box 391
 Ashland KY 41114 05/15/89 5000.00

Receipt for: General Year-to-Date Total: \$ 10000.00

F. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.
 Brownbuilders PAC
 P. O. Box 3
 Houston TX 77001 06/28/89 500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

SUBTOTAL of Receipts This Page 15700.00

TOTAL This Period

EXHIBIT A

**ITEMIZED RECEIPTS
 (Name Schedule A)**

For Line Number 12

Any info. copied from such Reports or Statements may not be sold or used in any manner for the purpose of soliciting contrib. or for commercial purpose other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: **Harner-Nichols Committee**

A. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Morton Thichel PAC
 110 N. Wacker Drive
 Chicago IL 60606
 06/30/89 1000.00 JFR

Receipt for: Primary Year-to-Date Total: \$ 1000.00

B. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

American Electric Power
 1167 K Street, N. W.
 Washington DC 20006 PAC
 06/30/89 1000.00 JFR

Receipt for: Primary Year-to-Date Total: \$ 1000.00

C. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Auction Markets PAC of
 141 N Jackson Boulevard
 Chicago IL 60604
 06/30/89 375.00 JFR

Receipt for: Primary Year-to-Date Total: \$ 1375.00

D. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Dealers Election Action
 8400 Westpark Drive
 McLean VA 22102
 06/30/89 500.00 JFR

Receipt for: Primary Year-to-Date Total: \$ 3000.00

E. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

AT&T PAC
 550 Madison Avenue
 New York NY 10022 PAC
 06/30/89 750.00 JFR

Receipt for: Primary Year-to-Date Total: \$ 2500.00

F. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

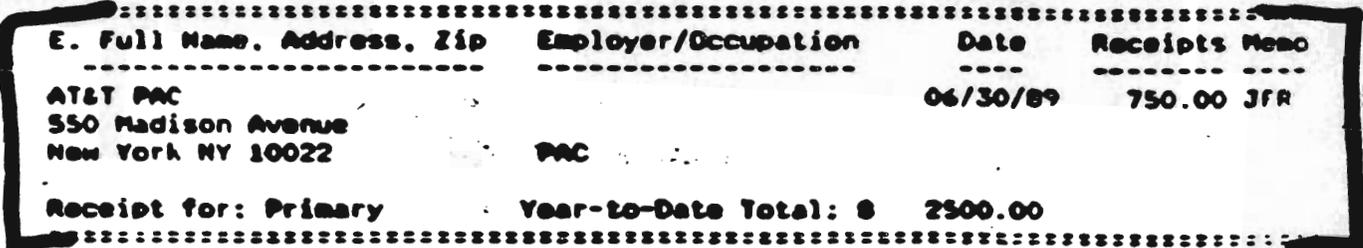
Columbia Gas Employees
 1250 Eye Street, N. W.
 Washington DC 20005
 06/30/89 500.00 JFR

Receipt for: Primary Year-to-Date Total: \$ 1500.00

SUBTOTAL of Receipts This Page 4125.00

TOTAL This Period

72040914179
 42
 42
 0
 0
 0
 0
 0
 0



SCHEDULE A

ITEMIZED RECEIPTS

Life Insurance
This category is separate from other categories of the Original Summary Page!

Any information carried from such Reports or 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 persons.

Name of Committee (in Full)

McConnell Senate Committee

A. Full Name, Mailing Address and ZIP Code

Shoney's PAC
c/o Robert M. Langford
1727 Elm Hill Pike
Nashville, TN 37210

Receipt For: Ordinary General
 Other (Specify):

Name of Employer

Date (month, day, year)

Amount of Cash Received This Period

05-06-85

1000.00

Occupation

Aggregate Year-to-Date-\$

1000.00

B. Full Name, Mailing Address and ZIP Code

American Medical PAC
1101 Vermont Avenue, NW
Washington, DC 20005

Receipt For: Ordinary General
 Other (Specify):

Name of Employer

Date (month, day, year)

Amount of Cash Received This Period

01-30-85

3200.00

Occupation

Aggregate Year-to-Date-\$

3200.00

C. Full Name, Mailing Address and ZIP Code

ICG Good Govt. Fund-IC Ind.
c/o Gary A. Lee, V. P.
1667 K Street, NW Ste 605
Washington, DC 20006

Receipt For: Ordinary General
 Other (Specify):

Name of Employer

Date (month, day, year)

Amount of Cash Received This Period

01-30-85

1000.00

Occupation

Aggregate Year-to-Date-\$

1000.00

D. Full Name, Mailing Address and ZIP Code

The E. F. Hutton Group PAC
c/o Daniel R. Murphy, Exec. V.P.
One Battery Park Plaza
New York, NY 10004

Receipt For: Ordinary General
 Other (Specify):

Name of Employer

Date (month, day, year)

Amount of Cash Received This Period

03-27-85

1000.00

Occupation

Aggregate Year-to-Date-\$

2000.00

E. Full Name, Mailing Address and ZIP Code

BUILD PAC
c/o Mr. Allen Valentine, Treas.
P. O. Box 50801
Dallas, TX 75250

Receipt For: Ordinary General
 Other (Specify):

Name of Employer

Date (month, day, year)

Amount of Cash Received This Period

02-19-85

250.00

Occupation

Aggregate Year-to-Date-\$

250.00

F. Full Name, Mailing Address and ZIP Code

Burlington Industries
c/o Donna Lee McGee-Gd Govt. Com.
P. O. Box 21207
Greensboro, NC 27420

Receipt For: Ordinary General
 Other (Specify):

Name of Employer

Date (month, day, year)

Amount of Cash Received This Period

03-04-85

1000.00

Occupation

Aggregate Year-to-Date-\$

1000.00

G. Full Name, Mailing Address and ZIP Code

Committee for Advancement of
Cotton/Wat. Cotton Council
P. O. Box 12292
Memphis, TN 38182

Receipt For: Ordinary General
 Other (Specify):

Name of Employer

Date (month, day, year)

Amount of Cash Received This Period

03-04-85

500.00

Occupation

Aggregate Year-to-Date-\$

500.00

TOTAL of Receipts This Page (Include).....

7950.00

Page 17
 This document is a summary of the financial activity of the Senate
 Summary Page

SCHEDULE A

ITEMIZED RECEIPTS

Any information copied from such Reports or 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 or Fund			
McConnell Senate Committee			
A. Full Name, Mailing Address and ZIP Code Build PAC of the Nat. Assoc. of Home Builders 15th & M Streets NW Washington, DC 20005	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation	1-30-85	5000.00
<input type="checkbox"/> Other (specify):	Aggregate Year-to-Date - \$ 5000.00		
B. Full Name, Mailing Address and ZIP Code J. P. Stevens & Co. Inc. Good Government Committee 1185 Ave. of the Americas New York, NY 10036	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation	1-30-85	1000.00
<input type="checkbox"/> Other (specify):	Aggregate Year-to-Date - \$ 1000.00		
C. Full Name, Mailing Address and ZIP Code Kempac 3532 Ephraim McDowell Drive Louisville, KY 40205	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation	1-30-85	1800.00
<input type="checkbox"/> Other (specify):	Aggregate Year-to-Date - \$ 1800.00		
D. Full Name, Mailing Address and ZIP Code TXPAC 11734 El Paso Circle Dallas, TX 75230	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation	1-30-85	500.00
<input type="checkbox"/> Other (specify):	Aggregate Year-to-Date - \$ 500.00		
E. Full Name, Mailing Address and ZIP Code Northrop Corp. Employees PAC 630 California Street, STE. 2650 San Francisco, CA 94108	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation	2-06-85	1800.00
<input type="checkbox"/> Other (specify):	Aggregate Year-to-Date - \$ 1800.00		
F. Full Name, Mailing Address and ZIP Code Tennessee Good Govt. Fund P. O. Box 2511 Houston, TX 77001	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation	2-06-85	300.00
<input type="checkbox"/> Other (specify):	Aggregate Year-to-Date - \$ 300.00		
G. Full Name, Mailing Address and ZIP Code Rayton Hudson Corp. PAC 777 Nicolet Mall Minneapolis, MN 55402	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation	2-19-86	1000.00
<input type="checkbox"/> Other (specify):	Aggregate Year-to-Date - \$ 1000.00		
Total of Receipts for the Period			10000.00

R 5 0 2 0 0 7 0 4 9 6

SCHEDULE A

ITEMIZED RECEIPTS

Any info. copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial purpose other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: McConnell Senate Committee '90

A. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Rohm and Haas PAC
 Independence Mall W.
 Philadelphia PA 19105 05/15/89 1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

B. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Norfolk Southern Corp. PAC
 One Commerical Place
 Norfolk VA 23510 06/16/89 1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

C. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

American Medical PAC
 1101 Vermont Avenue, NW
 Washington DC 20005 05/15/89 1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

D. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

OXY-PAC-Occidental Intern. Corp.
 10889 Wilshire Boulevard
 Los Angeles CA 90024 06/16/89 1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

E. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Americans for Good Government
 1510 Alabama Avenue
 Jasper AL 35501 PAC 03/21/89 4000.00

Receipt for: Primary Year-to-Date Total: \$ 5000.00

F. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Americans for Good Government
 1510 Alabama Avenue
 Jasper AL 35501 PAC 03/21/89 1000.00

Receipt for: General Year-to-Date Total: \$ 5000.00

SUBTOTAL of Receipts This Page 9000.00

TOTAL This Period

Any information copied from such Reports or 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)
McConnell Senate Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Whirlpool PAC 2000 U. S. 33 North Benton Harbor, MI 49022	Occupation	1-11-85	500.00
Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 500.00		
B. Full Name, Mailing Address and ZIP Code WILPAC-Willemette Industries Inc 3800 First National Bank Tower Portland, OR 97201	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	1-11-85	500.00
Aggregate Year-to-Date-\$ 500.00			
C. Full Name, Mailing Address and ZIP Code General Motors Civic Envol. Pro. 3044 West Grand Boulevard Detroit Michigan 48202	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	1-25-85	1000.00
Aggregate Year-to-Date-\$ 1000.00			
D. Full Name, Mailing Address and ZIP Code Great-Line PAC No. 1 Financial Square Louisville, KY 40270	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	1-25-85	1000.00
Aggregate Year-to-Date-\$ 1000.00			
E. Full Name, Mailing Address and ZIP Code American Dental PAC 1101 17th Street, NW, Ste. 1002 Washington, DC 20036	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	1-25-85	5000.00
Aggregate Year-to-Date-\$ 5000.00			
F. Full Name, Mailing Address and ZIP Code Assoc. Builders & Contractors PAC 1806 South Third Street Louisville, KY 40208	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	1-25-85	1000.00
Aggregate Year-to-Date-\$ 1000.00			
G. Full Name, Mailing Address and ZIP Code SURE Committee P. O. Box 32170 Louisville, KY 40232	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	1-25-85	200.00
Aggregate Year-to-Date-\$ 200.00			
TOTAL of Receipts This Page (continued).....			9200.00
TOTAL This Period (See page 616 line number only)			

1
2
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SECTION A

STANDARDIZED RECEIPTS

Any info. copied from such Reports or Statements may not be sold or used in any person for the purpose of soliciting contrib. or for commercial purposes other than using name & addr. of a political comm. to solicit from the same.

Full Name of Committee: McConnell Senate Committee '90

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Mem.
American Meat Institute PAC 1700 N Moore Street #1200 Arlington VA 22209		06/27/89	2500.00

Receipt for: Primary Year-to-Date Total: \$ 2500.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Mem.
AT&T PAC 550 Madison Avenue New York NY 10022	PAC	06/29/89	1750.00

Receipt for: Primary Year-to-Date Total: \$ 2500.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Mem.
American Dental PAC 1101 NW 14th Street #1100 Washington DC 20005		05/26/89	1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Mem.
Ashland Oil PAC for Empl. (PACE) P. O. Box 391 Ashland KY 41114		03/10/89	5000.00

Receipt for: Primary Year-to-Date Total: \$ 10000.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Mem.
Ashland Oil PAC for Empl. (PACE) P. O. Box 391 Ashland KY 41114		05/15/89	5000.00

Receipt for: General Year-to-Date Total: \$ 10000.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Mem.
Brownbuilders PAC P. O. Box 3 Houston TX 77001		06/28/89	500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

SUBTOTAL of Receipts This Page 15700.00

TOTAL This Period

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for
 common or purposes, other than using the name and address of any political committee to solicit contributions from such committee

Name of Committee (in Full)
McConnell Senate Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Nat. Ready Mixed Concrete Assoc. 900 Spring Street Silver Spring, MD 20910		1-25-85	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	1-25-85	500.00
Aggregate Year-to-Date—\$ 500.00			
B. Full Name, Mailing Address and ZIP Code Union Camp Corporation PAC 1600 Valley Road Wayne, NJ 07470		1-25-85	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	1-25-85	1000.00
Aggregate Year-to-Date—\$ 1000.00			
C. Full Name, Mailing Address and ZIP Code RJR Good Government Fund P. O. Box 718 Winston-Salem, NC 27102		1-25-85	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	1-25-85	1000.00
Aggregate Year-to-Date—\$ 1000.00			
D. Full Name, Mailing Address and ZIP Code ANPAC American Motorcyclist PAC P. O. Box 141 Westerville, OH 43081		1-30-85	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	1-30-85	500.00
Aggregate Year-to-Date—\$ 500.00			
E. Full Name, Mailing Address and ZIP Code Ashland OIL (PACE) P. O. Box 391 Ashland, KY 41114		1-30-85	2000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	1-30-85	2000.00
Aggregate Year-to-Date—\$ 2000.00			
F. Full Name, Mailing Address and ZIP Code GLEN-PAC 1700 Citizens Plaza Louisville, KY 40202		1-30-85	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	1-30-85	1000.00
Aggregate Year-to-Date—\$ 1000.00			
G. Full Name, Mailing Address and ZIP Code Comm. for Advancement of Cotton P. O. Box 12292 Memphis, TN 38182		1-30-85	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	1-30-85	500.00
Aggregate Year-to-Date—\$ 500.00			
Subtotal of Receipts This Page (printed)			6500.00
TOTAL This Period (sum page 64b and number only)			

0 2 0 7 0 3 2 4

SIMILAR A

STERILIZED RECEIPTS

Any info. copied from such Reports or Statements may not be sold or used in any person for the purpose of soliciting contrib. or for commercial purpose other than using name & addr. of a political comm to solicit from the comm.

Full Name of Committee: McConnell Senate Committee '90

A. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.
 American Meat Institute PAC
 1700 N Moore Street #1400
 Arlington VA 22209 06/27/89 2500.00

Receipt for: Primary Year-to-Date Total: \$ 2500.00

B. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.
 AT&T PAC
 350 Madison Avenue
 New York NY 10022 PAC 06/29/89 1750.00

Receipt for: Primary Year-to-Date Total: \$ 2500.00

C. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.
 American Dental PAC
 1101 NW 14th Street #1100
 Washington DC 20005 05/26/89 1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

D. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.
 Ashland Oil PAC for Empl. (PACE)
 P. O. Box 391
 Ashland KY 41114 03/10/89 5000.00

Receipt for: Primary Year-to-Date Total: \$ 10000.00

E. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.
 Ashland Oil PAC for Empl. (PACE)
 P. O. Box 391
 Ashland KY 41114 05/15/89 5000.00

Receipt for: General Year-to-Date Total: \$ 10000.00

F. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.
 Brownbuilders PAC
 P. O. Box 3
 Houston TX 77001 06/28/89 500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

SUBTOTAL of Receipts This Page 15750.00

TOTAL This Period

McConnell Senate Committee 1990
1985 Year-End Report
Attachment # G1

SCHEDULE A

ITEMIZED RECEIPTS

THIS IS A COPY OF THE
FORM NUMBER 1111
THIS REPORT IS SUBJECT TO THE
REGULATIONS OF THE COMMISSION
ON FEDERAL CAMPAIGN FINANCE

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of any long-term business or other commercial purposes, other than using the name and address of any political committee to solicit contributions from such person.

Name of Committee (in Full)

McConnell Senate Committee

A. Full Name, Mailing Address and ZIP Code

Assoc. Gen. Cont. of America PAC
c/o Joan Huntley LaVor, Director
1957 E Street NW
Washington, DC 20006

Receipt For: Primary General
 Other (specify):

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

02-14-85

500.00

Occupation

Aggregate Year-to-Date-\$

500.00

B. Full Name, Mailing Address and ZIP Code

Transportation Pol. Educ. League
United Transportation Union
14600 Detroit Avenue
Cleveland, OH 44107

Receipt For: Primary General
 Other (specify):

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

02-01-85

1000.00

Occupation

Aggregate Year-to-Date-\$

1000.00

C. Full Name, Mailing Address and ZIP Code

Nat. Assoc. of Life Underwriters (LUPAC)
1922 F Street NW
Washington, DC 20006

Receipt For: Primary General
 Other (specify):

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

02-19-85

1500.00

Occupation

Aggregate Year-to-Date-\$

1500.00

D. Full Name, Mailing Address and ZIP Code

National Realty PAC
Suite 303
2033 M Street, NW
Washington, DC 20036

Receipt For: Primary General
 Other (specify):

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

02-19-85

500.00

Occupation

Aggregate Year-to-Date-\$

500.00

E. Full Name, Mailing Address and ZIP Code

RPSI PAC
P. O. Box 3000
Dallas, TX 75221

Receipt For: Primary General
 Other (specify):

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

03-27-85

250.00

Occupation

Aggregate Year-to-Date-\$

250.00

F. Full Name, Mailing Address and ZIP Code

Sante Fe Southern Pacific Corp.
PAC-c/o John Barriger, Chairman
224 S. Michigan Avenue
Chicago, IL 60604

Receipt For: Primary General
 Other (specify):

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

01-25-85

1000.00

Occupation

Aggregate Year-to-Date-\$

1000.00

G. Full Name, Mailing Address and ZIP Code

Staley Political Action Comm.
2200 E. Eldorado Street
Decatur, IL 62521

Receipt For: Primary General
 Other (specify):

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

03-04-85

1000.00

Occupation

Aggregate Year-to-Date-\$

1000.00

SUBTOTAL of Receipts This Page (optional)

5750.00

TOTAL This Period (See page 10 for number only)

SCHEDULE A

ITEMIZED RECEIPTS

Page 20 of 26
 for Line Number 11

Any info. copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial purposes other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: McConnell Senate Committee '90

A. Full Name, Address, Zip Employer/Occupation Date Receipt Mem
 New Orleans Public Serv. Inc. Comm. for Resp. Govt
 P. O. Box 20340 04/14/89 500.00
 New Orleans LA 70160 PAC

Receipt for: Primary Year-to-Date Total: \$ 500.00

B. Full Name, Address, Zip Employer/Occupation Date Receipt Mem
 ConAgri Good Govt. Assoc.
 888 17th Street, NW 04/14/89 1000.00
 Washington DC 20006 PAC

Receipt for: Primary Year-to-Date Total: \$ 1000.00

C. Full Name, Address, Zip Employer/Occupation Date Receipt Mem
 ECKPAC Eckard Comm. for Responsible Govt.
 Jack Eckard Corp. 04/14/89 500.00
 Clearwater FL 33518 PAC

Receipt for: Primary Year-to-Date Total: \$ 500.00

D. Full Name, Address, Zip Employer/Occupation Date Receipt Mem
 FERT PAC
 1015 18th St., NW #F1.10 04/14/89 1000.00
 Washington DC 20036 PAC 04/14/89 1000.00

Receipt for: Primary Year-to-Date Total: \$ 2000.00

E. Full Name, Address, Zip Employer/Occupation Date Receipts Mem
 Assoc. Gen. Contractors of America - PAC
 1957 E. Street, N. W. 04/21/89 5000.00
 Washington DC 20006 PAC

Receipt for: Primary Year-to-Date Total: \$ 5000.00

F. Full Name, Address, Zip Employer/Occupation Date Receipts Mem
 American Cyanamid Good Govt. Fund
 1545 Eye Street, N. W. 04/21/89 500.00
 Washington DC 20005 PAC

Receipt for: Primary Year-to-Date Total: \$ 500.00

SUBTOTAL of Receipts This Page 9500.00

TOTAL This Period

All information received from such Reports or Statements may not be 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)

McConnell Senate Committee

A. Full Name, Mailing Address and ZIP Code

**Build PAC of the Nat. Assoc.
 of Home Builders
 15th & M Streets NW
 Washington, DC 20005**

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

1-30-85

5000.00

Receipt For: Primary General

Other (specify):

Aggregate Year-to-Date - \$ 5000.00

B. Full Name, Mailing Address and ZIP Code

**J. P. Stevens & Co. Inc. Good
 Government Committee
 1185 Ave. of the Americas
 New York, NY 10036**

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

1-30-85

1000.00

Receipt For: Primary General

Other (specify):

Aggregate Year-to-Date - \$ 1000.00

C. Full Name, Mailing Address and ZIP Code

**Kempac
 3532 Ephraim McDowell Drive
 Louisville, KY 40205**

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

1-30-85

1800.00

Receipt For: Primary General

Other (specify):

Aggregate Year-to-Date - \$ 1800.00

D. Full Name, Mailing Address and ZIP Code

**TXPAC
 11734 El Hara Circle
 Dallas, TX 75230**

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

1-30-85

500.00

Receipt For: Primary General

Other (specify):

Aggregate Year-to-Date - \$ 500.00

E. Full Name, Mailing Address and ZIP Code

**Northrop Corp. Employees PAC
 650 California Street, STE. 2650
 San Francisco, CA 94108**

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

2-06-85

1000.00

Receipt For: Primary General

Other (specify):

Aggregate Year-to-Date - \$ 1000.00

F. Full Name, Mailing Address and ZIP Code

**Tenneco Good Govt. Fund
 P. O. Box 2511
 Houston, TX 77001**

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

2-06-85

500.00

Receipt For: Primary General

Other (specify):

Aggregate Year-to-Date - \$ 500.00

G. Full Name, Mailing Address and ZIP Code

**Dayton Hudson Corp. PAC
 777 Nicollet Mall
 Minneapolis, MN 55402**

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

2-19-86

1000.00

Receipt For: Primary General

Other (specify):

Aggregate Year-to-Date - \$ 1000.00

GRAND TOTAL of Receipts This Page (optional)

10800.00

TOTAL This Period (See page 10 for number only)

720 A509210470476

EXHIBIT A

STERILIZED RECEIPTS

Page 1 of 1
 for Line Item: 1.

.....
 any info. copied from such Reports or Statements may not be sold or used by
 any person for the purpose of soliciting contrib. or for commercial purposes,
 other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: McConnell Senate Committee '90

A. Full Name, Address, Zip Employer/Occupation Date Receipt Memo

women's Alliance for Israel PAC
 8304 Wilshire Boulevard
 Beverly Hills CA 90211
 06/29/89 1000.00

Receipt for: General Year-to-Date Total: \$ 2000.00

B. Full Name, Address, Zip Employer/Occupation Date Receipt Memo

GenCorp Co. PAC
 175 Ghent Road
 Fairlawn OH 44313
 06/25/89 500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

C. Full Name, Address, Zip Employer/Occupation Date Receipt Memo

Build PAC of the National Association of Homebuild.
 15 NW M Streets
 Washington DC 20005
 06/21/89 500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

D. Full Name, Address, Zip Employer/Occupation Date Receipt Memo

Fed. of American Health Systems--FED PAC
 1111 NW 19th Street 8402
 Washington DC 20036
 06/29/89 1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

E. Full Name, Address, Zip Employer/Occupation Date Receipt Memo

Marine Engineers Ben. Assoc
 444 N Capitol Street
 Washington DC 20001
 06/30/89 2000.00

Receipt for: Primary Year-to-Date Total: \$ 2000.00

F. Full Name, Address, Zip Employer/Occupation Date Receipt Memo

Nat. Pest Control Assn. PAC
 8100 Oak Street
 Dunn Loring VA 22027
 06/29/89 500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

SUBTOTAL of Receipts This Page 10000.00

TOTAL This Period

SECRET

Any information reported from such Reports or 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)
McConnell Senate Committee

A. Full Name, Mailing Address and ZIP Code
Dairyman, Inc.
10140 Linn Station Road
Anchorage, KY 40223

Name of Employer: _____ Date (month, day, year): **3-04-85** Amount of Each Receipt This Period: **1000.00**

Occupation: _____

Reason For: Primary General
 Other (specify): _____

Aggregate Year-to-Date-\$ **1000.00**

B. Full Name, Mailing Address and ZIP Code
Illinois Tool Works, Inc. PAC
8501 W. Higgins Road
Chicago, IL 60631

Name of Employer: _____ Date (month, day, year): **3-04-85** Amount of Each Receipt This Period: **500.00**

Occupation: _____

Reason For: Primary General
 Other (specify): _____

Aggregate Year-to-Date-\$ **500.00**

C. Full Name, Mailing Address and ZIP Code
Automobile & Truck Dealers PAC
Nat. Auto Dealers Assoc.
8400 Westpark Drive
McLean, VA 22102

Name of Employer: _____ Date (month, day, year): **3-04-85** Amount of Each Receipt This Period: **500.00**

Occupation: _____

Reason For: Primary General
 Other (specify): _____

Aggregate Year-to-Date-\$ **500.00**

D. Full Name, Mailing Address and ZIP Code
LEPAC
Litton Industries
360 N. Crescent Drive
Beverly Hills, CA 90210

Name of Employer: _____ Date (month, day, year): **3-04-85** Amount of Each Receipt This Period: **2000.00**

Occupation: _____

Reason For: Primary General
 Other (specify): _____

Aggregate Year-to-Date-\$ **2000.00**

E. Full Name, Mailing Address and ZIP Code
Nat. Soc. of Professional Eng.
P. O. Box 57059
Washington, DC 20037

Name of Employer: _____ Date (month, day, year): **3-12-85** Amount of Each Receipt This Period: **2500.00**

Occupation: _____

Reason For: Primary General
 Other (specify): _____

Aggregate Year-to-Date-\$ **2500.00**

F. Full Name, Mailing Address and ZIP Code
Texas Utilities Electric Co. PAC
2001 Bryan Tower, 19th Floor
Dallas, TX 75201

Name of Employer: _____ Date (month, day, year): **3-12-85** Amount of Each Receipt This Period: **300.00**

Occupation: _____

Reason For: Primary General
 Other (specify): _____

Aggregate Year-to-Date-\$ **300.00**

G. Full Name, Mailing Address and ZIP Code
Outdoor Advertising PAC
1899 L Street, N.W. Suite 403
Washington, DC 20036

Name of Employer: _____ Date (month, day, year): **3-12-85** Amount of Each Receipt This Period: **1000.00**

Occupation: _____

Reason For: Primary General
 Other (specify): _____

Aggregate Year-to-Date-\$ **1000.00**

SUBTOTAL of Receipts This Page (printed)..... **7800.00**

TOTAL This Period (fill page with the number only)

9 11 0 2 0 7 0 7 1 0

SCHEDULE A

ITEMIZED RECEIPTS

Any info. copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial purposes other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: McConnell Senate Committee '90

A. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 Dairymen Inc. KY Com. for Pol. Action
 10140 Linn Station Road
 Louisville KY 40223 PAC 10/11/88 2000.00
 Receipt for: Primary Year-to-Date Total: \$ 2000.00

B. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 The Fertilizer Institute PAC
 1015 NW 18th Street
 Washington DC 20036 PAC 10/11/88 1000.00
 Receipt for: Primary Year-to-Date Total: \$ 1000.00

C. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 AT&T PAC
 350 Madison Avenue
 New York NY 10022 PAC 12/19/88 2500.00
 Receipt for: Primary Year-to-Date Total: \$ 2500.00

D. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 Phelps Dodge Emp. Fund for Good Govt.
 2600 N. Central Avenue
 Phoenix AZ 85004 12/06/88 200.00
 Receipt for: Primary Year-to-Date Total: \$ 200.00

E. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 Com/Energy Employees For A Responsible Congress
 Post Office Box 9180
 Cambridge MA 02142 PAC 12/30/88 300.00
 Receipt for: Primary Year-to-Date Total: \$ 300.00

F. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 Northern States Power Emp PAC
 414 Nicollet Mall
 Minneapolis MN 55401 PAC 12/30/88 300.00
 Receipt for: Primary Year-to-Date Total: \$ 300.00

G. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 BLDTOTAL of Receipts This Page 6700.00
 TOTAL This Period

SCHEDULE A STENIZED RECEIPTS

Any info. copied from such Reports or Statements may not be sold or used in any person for the purpose of eliciting contrib. or for commercial purposes other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: McConnell Senate Committee '90

A. Full Name, Address, Zip Employer/Occupation Date Receipts Recd.
 Columbia Gas Employees PAC
 1214 1st Street, N. W.
 Washington DC 20005 06/23/89 1000.00

Receipt for: Primary Year-to-Date Total: \$ 1500.00

B. Full Name, Address, Zip Employer/Occupation Date Receipts Recd.
 KY Utilities Company PAC
 One Quality Street 0505
 Lexington KY 40507 PAC 05/21/89 1000.00
 05/16/89 2000.00

Receipt for: Primary Year-to-Date Total: \$ 3000.00

C. Full Name, Address, Zip Employer/Occupation Date Receipts Recd.
 Pealody PAC
 301 N Memorial Drive
 OSt. Louis MO 63102 06/12/89 2000.00

Receipt for: Primary Year-to-Date Total: \$ 2000.00

D. Full Name, Address, Zip Employer/Occupation Date Receipts Recd.
 Dairyman Inc. KY Com. for Pol. Action
 10140 Linn Station Road
 Louisville KY 40223 PAC 05/26/89 2000.00

Receipt for: Primary Year-to-Date Total: \$ 7000.00

E. Full Name, Address, Zip Employer/Occupation Date Receipts Recd.
 Dairyman Inc. KY Com. for Pol. Action
 10140 Linn Station Road
 Louisville KY 40223 PAC 05/26/89 4000.00

Receipt for: General Year-to-Date Total: \$ 7000.00

F. Full Name, Address, Zip Employer/Occupation Date Receipts Recd.
 Citizens Organized PAC
 1800 Avenue of the Stars
 Los Angeles CA 90067 06/28/89 5000.00

Receipt for: Primary Year-to-Date Total: \$ 5000.00

SUBTOTAL of Receipts This Page 18000.00
 TOTAL This Period

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Full Name of Committee: McConnell Senate Committee '90

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Continental Telecom PAC 555 NW Thirteenth Street Washington DC 20004	PAC	07/21/89	1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Columbia Gas Empl. PAC 1250 Eye Street, N. W. Washington DC 20005	Columbia Nat. Resour. Inc.	09/02/89	1000.00

Receipt for: Primary Year-to-Date Total: \$ 2500.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
KY Utilities Company PAC One Quality Street #505 Lexington KY 40507	PAC	12/29/89	1000.00

Receipt for: Primary Year-to-Date Total: \$ 4000.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Dairymen Inc. KY Com. for Pol. Action 10140 Linn Station Road Louisville KY 40223	PAC	10/13/89	800.00

Receipt for: General Year-to-Date Total: \$ 8000.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Hudson Valley PAC 100 Red Schoolhouse Road Spring Valley NY 10977		10/31/89	5000.00

Receipt for: Primary Year-to-Date Total: \$ 5000.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Marriott PAC Marriott Drive Washington DC 20058		12/28/89	1000.00

Receipt for: Primary Year-to-Date Total: \$ 2000.00

SUBTOTAL of Receipts This Page 9800.00

TOTAL This Period

9200420014158064

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Name of Committee (in Full)
McConnell Senate Committee

A. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Dairymen, Inc. 10140 Linn Station Road Anchorage, KY 40223			3-04-85	1000.00
Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$ 1000.00	
B. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Illinois Tool Works, Inc. PAC 8501 W. Higgins Road Chicago, IL 60631			3-04-85	500.00
Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$ 500.00	
C. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Automobile & Truck Dealers PAC Nat. Auto Dealers Assoc. 8400 Westpark Drive McLean, VA 22102			3-04-85	500.00
Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$ 500.00	
D. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
LEPAC Litton Industries 360 N. Crescent Drive Beverly Hills, CA 90210			3-04-85	2000.00
Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$ 2000.00	
E. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Nat. Soc. of Professional Eng. P. O. Box 57059 Washington, DC 20037			3-12-85	2500.00
Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$ 2500.00	
F. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Texas Utilities Electric Co. PAC 2001 Bryan Tower, 19th Floor Dallas, TX 75201			3-12-85	300.00
Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$ 300.00	
G. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Outdoor Advertising PAC 1899 L Street, N.W. Suite 403 Washington, DC 20036			3-12-85	1000.00
Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$ 1000.00	
TOTAL of Receipts This Page (include)				7800.00
TOTAL This Period (fill page with the number only)				

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Any information appearing from such Reports or 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 (or Fund)			
McConnell Senate Committee			
A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Received This Period
Non Partisan Political Sup.Com. General Electric Company 3135 Eastern Turnpike Fairfield, CT. 06431		03-10-86	750.00
Receipt For <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Description	Aggregate Year to Date - \$	
		750.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Received This Period
Dealers Election Action Comm. of the Nat'l Auto. Dealers Assoc 6400 Westpark Drive McLean, VA 22102		02-20-86	2000.00
Receipt For <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Description	Aggregate Year to Date - \$	
		2000.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Received This Period
Manufacturers Hanover Corp. Assoc. for Responsible Gov't 270 Park Avenue 36th Floor New York, NY 10017		01-10-86	50.00
Receipt For <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Description	Aggregate Year to Date - \$	
		50.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Received This Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Description	Aggregate Year to Date - \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Received This Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Description	Aggregate Year to Date - \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Received This Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Description	Aggregate Year to Date - \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Received This Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Description	Aggregate Year to Date - \$	
SUBTOTAL of Receipts This Page (amount)			2000.00
TOTAL This Period Run page this line number only!			7250.00

SCHEDULE A

STERILIZED RECEIPTS

For Line Number 11.

.....
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 any person for the purpose of soliciting contrib. or for commercial purposes
 other than using name & addr. of a political comm. to solicit from the same

Full Name of Committee: McConnell Senate Committee '90

A. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Auction Markets PAC of the Chicago Bd of Trade
 141 W Jackson Boulevard 06/12/89 1000.00
 Chicago IL 60604

Receipt for: Primary Year-to-Date Total: \$ 1375.00

B. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

South Central Bell Fed. PAC
 19 P. O. Box 32410 04/14/89 800.00
 Louisville KY 40232 PAC

Receipt for: Primary Year-to-Date Total: \$ 800.00

C. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Dealers Election Action Comm.
 8400 Westpark Drive 05/15/89 2000.00
 McLean VA 22102 06/12/89 900.00

Receipt for: Primary Year-to-Date Total: \$ 3000.00

D. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

A. T. Massey Coal Pol. Assistance Committee
 P. O. Box 26765 06/16/89 1000.00
 Richmond VA 23261

Receipt for: Primary Year-to-Date Total: \$ 1000.00

E. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Capital Holding Corp. PAC
 680 Fourth Avenue 03/10/89 4000.00
 Louisville KY 40232

Receipt for: Primary Year-to-Date Total: \$ 4000.00

F. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Cincinnati Bell Fed. PAC
 201 E 4th Street, Box 2301 03/21/89 1000.00
 Cincinnati OH 45201 PAC 05/15/89 3000.00

Receipt for: Primary Year-to-Date Total: \$ 5000.00

SUBTOTAL of Receipts This Page 13300.00

TOTAL This Period

SECTION A **VERIFIED RECEIPTS** **FOR LINE NUMBER**
 (Name Schedule A)

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Full Name of Committee: Warner-Nichols Committee

A. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 Morton Thiokol PAC 06/30/89 1000.00 JFR
 110 N. Wacker Drive
 Chicago IL 60606

Receipt for: Primary Year-to-Date Total: \$ 1000.00

B. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 American Electric Power 06/30/89 1000.00 JFR
 1647 R Street, N. W.
 Washington DC 20006 PAC

Receipt for: Primary Year-to-Date Total: \$ 1000.00

C. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 Auction Markets PAC of 06/30/89 375.00 JFR
 141 N Jackson Boulevard
 Chicago IL 60604

Receipt for: Primary Year-to-Date Total: \$ 1375.00

D. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 Dealers Election Action 06/30/89 500.00 JFR
 8400 Westpark Drive
 McLean VA 22102

Receipt for: Primary Year-to-Date Total: \$ 3000.00

E. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 AT&T PAC 06/30/89 750.00 JFR
 550 Madison Avenue
 New York NY 10022 PAC

Receipt for: Primary Year-to-Date Total: \$ 2500.00

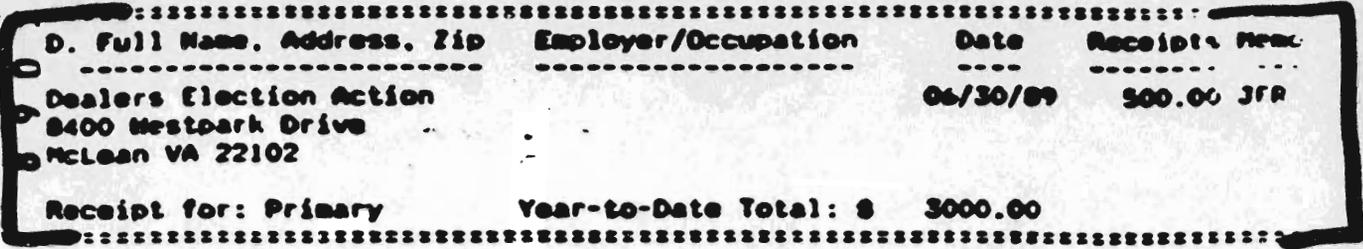
F. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 Columbia Gas Employees 06/30/89 500.00 JFR
 1250 Eye Street, N. W.
 Washington DC 20005

Receipt for: Primary Year-to-Date Total: \$ 1500.00

SUBTOTAL of Receipts This Page 4125.00

TOTAL This Period

20409141207



SCHEDULE A

ITEMIZED RECEIPTS

for Line Number 11

Any info. copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial purposes other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: McConnell Senate Committee '90

A. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 National City PAC
 1900 E Ninth Street 05/15/89 3000.00
 Cleveland OH 44114

Receipt for: Primary Year-to-Date Total: \$ 3000.00

B. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 Crowell & Moring PAC
 1001 NW Pennsylvania Avenue 05/26/89 125.00
 Washington DC 20004 06/12/89 500.00

Receipt for: Primary Year-to-Date Total: \$ 625.00

C. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 Calagia, Day, Marshall, Mintzire & Chauvin PAC
 P. O. Box 1179 05/26/89 1000.00
 Louisville KY 40201

Receipt for: Primary Year-to-Date Total: \$ 1000.00

D. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 Ice Cream & Milk PAC
 888 16th Street, NW 05/26/89 2000.00
 Washington DC 20006

Receipt for: Primary Year-to-Date Total: \$ 2625.00

E. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 Pinkerton Tobacco Co. PAC
 P. O. Box 11588 05/26/89 1000.00
 Richmond VA 23230

Receipt for: Primary Year-to-Date Total: \$ 1000.00

F. Full Name, Address, Zip Employer/Occupation Date Receipts Memo
 TEPAC - Teco Energy Inc.
 702 N. Franklin 05/26/89 1500.00
 Tampa FL 33602

Receipt for: Primary Year-to-Date Total: \$ 1500.00

SUBTOTAL of Receipts This Page 9125.00

TOTAL This Period

SCHEDULE A

**ITEMIZED RECEIPTS
 (Memo Schedule A)**

for Line Number 12

Any info. copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial purpose other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: **Warner-Nickles Committee**

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Harris FEPAC		06/30/89	1000.00 JFR

Melbourne FL 32919

Receipt for: Primary Year-to-Date Total: \$ 1000.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Fluor Public Affairs Com. 3333 Nicholson Drive Irvine CA 92730		06/30/89	625.00 JFR

Receipt for: Primary Year-to-Date Total: \$ 1625.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
A. R. Donnelley & Sons Co 2223 S. Martin Luther King Chicago IL 60616		06/30/89	1000.00 JFR

Receipt for: Primary Year-to-Date Total: \$ 1500.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Mobil Oil Corp. PAC 150 E. 42nd Street New York NY 10017		06/30/89	5000.00 JFR

Receipt for: Primary Year-to-Date Total: \$ 5000.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Barnett People for Better P.O. Box 5257 Tallahassee FL 32314		06/30/89	1000.00 JFR

Receipt for: Primary Year-to-Date Total: \$ 1000.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Ice Cream & Milk PAC 888 16th Street, NW Washington DC 20006		06/30/89	625.00 JFR

Receipt for: Primary Year-to-Date Total: \$ 2625.00

SUBTOTAL of Receipts This Page 9250.00

TOTAL This Period

(Summary Page)

Any information copied from such Reports or 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)
McConnell Senate Committee

A. Full Name, Mailing Address and ZIP Code Commodity Futures Political Fund Chicago Mercantile Exchange 30 S. Wacker Drive Chicago, IL 60606	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	3-27-85	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 2000.00		

B. Full Name, Mailing Address and ZIP Code Nobil Oil Corporation PAC 150 East 42nd Street New York, NY 10017	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	4-16-85	2500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 2500.00		

C. Full Name, Mailing Address and ZIP Code Tenneco Employees Good Govt. Fund P. O. Box 2511 Houston, TX 77001	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	4-16-85	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 2500.00		

D. Full Name, Mailing Address and ZIP Code AT & T PAC 550 Madison Avenue New York, NY 10022	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	4-16-85	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 500.00		

E. Full Name, Mailing Address and ZIP Code Texas Eastern PAC P. O. Box 2521 Houston, TX 77001	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	4-16-85	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 1000.00		

F. Full Name, Mailing Address and ZIP Code Carolina Power & Light PAC P. O. Box 1510 Raleigh, NC 27602	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	4-16-85	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 500.00		

G. Full Name, Mailing Address and ZIP Code Commodity Futures Political Fund Chicago Mercantile Exchange 30 S. Wacker Drive Chicago, IL 60606	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	3-06-85	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 1000.00		

TOTAL, of Receipts This Page (entered).....	7000.00
TOTAL, This Period (see page 6th line number only).....	

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SCHEDULE A **FINANCIAL RECEIPTS** **For Line Number 12**
(Name Schedule A)

Any info. copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial purpose other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: **Warner-Nichols Committee**

A. Full Name, Address, Zip Employer/Occupation Date Receipts Mem

Morris FEPAC **06/30/89** **1000.00** **JFF**
Melbourne FL 32919

Receipt for: Primary Year-to-Date Total: \$ 1000.00
B. Full Name, Address, Zip Employer/Occupation Date Receipts Mem

Fluor Public Affairs Com. **06/30/89** **625.00** **JFF**
1333 Nicholson Drive
Irving CA 92730

Receipt for: Primary Year-to-Date Total: \$ 1625.00
C. Full Name, Address, Zip Employer/Occupation Date Receipts Mem

C. R. Donnelley & Sons Co **06/30/89** **1000.00** **JFF**
2223 S. Martin Luther King
Chicago IL 60616

Receipt for: Primary Year-to-Date Total: \$ 1500.00
D. Full Name, Address, Zip Employer/Occupation Date Receipts Mem

Mobil Oil Corp. PAC **06/30/89** **3000.00** **JFF**
150 E. 42nd Street
New York NY 10017

Receipt for: Primary Year-to-Date Total: \$ 5000.00
E. Full Name, Address, Zip Employer/Occupation Date Receipts Mem

Barnett People for Better **06/30/89** **1000.00** **JFF**
P.O. Box 5257
Tallahassee FL 32314

Receipt for: Primary Year-to-Date Total: \$ 1000.00
F. Full Name, Address, Zip Employer/Occupation Date Receipts Mem

Ice Cream & Milk PAC **06/30/89** **625.00** **JFF**
888 16th Street, NW
Washington DC 20006

Receipt for: Primary Year-to-Date Total: \$ 2625.00
G. Full Name, Address, Zip Employer/Occupation Date Receipts Mem

Ice Cream & Milk PAC **06/30/89** **625.00** **JFF**
888 16th Street, NW
Washington DC 20006

SUBTOTAL of Receipts This Page **9250.00**
TOTAL This Period

Continued on page 1

All information reported from such Reports or 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)
McConnell Senate Committee

A. Full Name, Mailing Address and ZIP Code
Texas Utilities-TUGCo PAC
400 N. Olive Street, LB 81
Dallas, TX 75201

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

3-12-85

300.00

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$ 300.00

B. Full Name, Mailing Address and ZIP Code
Cities Service Oil and Gas PAC
110 W. 7th Street, Suite 2565
Tulsa, OK 74119

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

3-12-85

500.00

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$ 500.00

C. Full Name, Mailing Address and ZIP Code
MFIB PAC
Nat. Fed. Of Independent Bus.
150 W. 20th Avenue
San Mateo, CA 94403

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

3-12-85

1000.00

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$ 1000.00

D. Full Name, Mailing Address and ZIP Code
Sears PAC
233 S. Wacker Drive
Chicago, IL 60606

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

3-12-85

500.00

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$ 500.00

E. Full Name, Mailing Address and ZIP Code
U. S. Steel Good Govt. Fund
818 Connecticut Avenue, NW
Washington, DC 20006

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

3-12-85

1000.00

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$ 1000.00

F. Full Name, Mailing Address and ZIP Code
CONTEL PAC
Continental Telecom Inc.
1800 K Street, N.W., Suite 629
Washington, DC 20006

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

3-27-85

500.00

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$ 500.00

G. Full Name, Mailing Address and ZIP Code
Peabody Political Action Com.
1120 20th St., NW., Ste. 720
Washington, DC 20036

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

3-27-85

1000.00

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$ 1000.00

TOTAL of Receipts This Page (Include)..... 4800.00

TOTAL This Period (See page 1 for further info).....

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4

SCHEDULE A

ITEMIZED RECEIPTS

For Line Number 100

Any info. copied from such Reports or Statements shall not be sold or used by any person for the purpose of soliciting contrib. or for commercial gain, other than using name & addr. of a political comm. to solicit from the same.

Full Name of Committee: McConnell Senate Committee '90

A. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

COM.PAC - PAC of the Nat. Coal Assoc.
 1130 17th Street, N. W.
 Washington DC 20036 06/21/89 1172.00

Receipt for: General Year-to-Date Total: \$ 2000.00

B. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Interstate Natural Gas Assoc.
 555 13th Street, N. W.
 Washington DC 20004 06/28/89 500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

C. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

PepsiCo.Concern.Cit.PAC (Citizens Fund)
 P. O. Box 32070
 Louisville KY 40232 06/16/89 3000.00
 06/15/89 919.40

IK = In-Kind Contribution: fundraising reception

Receipt for: Primary Year-to-Date Total: \$ 3919.40

D. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Morrison's Political Action Com.
 P. O. Box 160266
 Mobile AL 36625 06/21/89 1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

E. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Texas Utilities Electric Co. PAC
 2001 Bryan Tower
 Dallas TX 75201 03/10/89 500.00

Receipt for: Primary Year-to-Date Total: \$ 1500.00

F. Full Name, Address, Zip Employer/Occupation Date Receipts Memo

Nat.Fed.of Indep.Business PAC
 150 N. 20th Avenue
 San Mateo CA 94403 06/29/89 2000.00

Receipt for: Primary Year-to-Date Total: \$ 5000.00

SUBTOTAL of Receipts This Page 9041.80

TOTAL This Period

SCHEDULE A

FINANCED RECEIPTS
 (Same Schedule A)

For Line Number 17

Any info. copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial purpose other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: Warner-Nichols Committee

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Electronic Data Systems 7171 Forest Lane Dallas TX 75230		02/30/89	300.00 JFR

Receipt for: General Year-to-Date Total: \$ 300.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
PAYO PAC 1800 E. Baltimore Avenue Tulsa OK 74119	PAC	04/30/89	300.00 JFR

Receipt for: Primary Year-to-Date Total: \$ 2500.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Non Partisan Pol. Support General Electric Co Fairfield CT 06431		06/30/89	375.00 JFR

Receipt for: Primary Year-to-Date Total: \$ 2375.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Independent Ins. Agents 600 SE Pennsylvania Avenue Washington DC 20003		06/30/89	1000.00 JFR

Receipt for: Primary Year-to-Date Total: \$ 2500.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Nat. Fed. of Indep. Business 150 N. 20th Avenue San Mateo CA 94403		06/30/89	3000.00 JFR

Receipt for: Primary Year-to-Date Total: \$ 3000.00

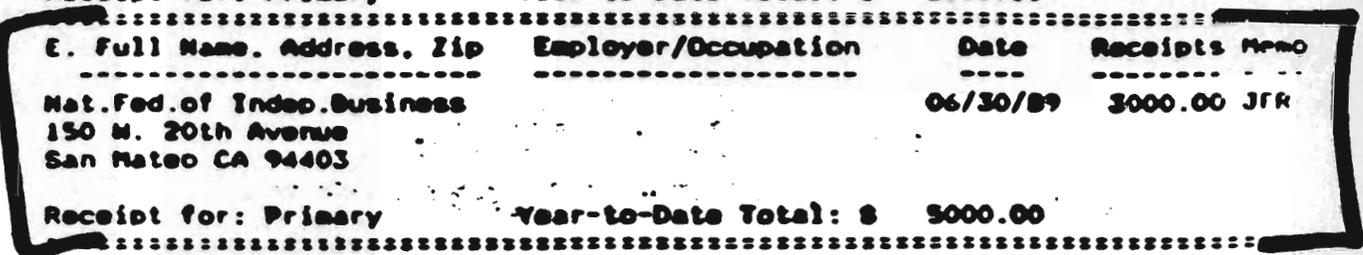
F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Broad Political Action 111 14th Street, N. W. Washington DC 20005		06/30/89	375.00 JFR

Receipt for: Primary Year-to-Date Total: \$ 375.00

SUBTOTAL of Receipts This Page 5750.00

TOTAL This Period

72040914199



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Name of Committee (in Full)

McConnell Senate Committee

A. Full Name, Mailing Address and ZIP Code

**S & A Restaurant Corp. Emp. PAC
 Steak & Ale Restaurant Cogr.
 6406 LBJ Freeway
 Dallas, TX 75240**

Receipts For: Primary General
 Other (specify):

Name of Employer

Occupation

Date (month, day, year)

5-06-85

Amount of Cash Received This Period

500.00

Aggregate Year-to-Date-\$ 500.00

B. Full Name, Mailing Address and ZIP Code

**FNC Good Government Program
 Suite 500 1627 K Street, NW
 Washington, DC 20006**

Receipts For: Primary General
 Other (specify):

Name of Employer

Occupation

Date (month, day, year)

5-06-85

Amount of Cash Received This Period

1000.00

Aggregate Year-to-Date-\$ 1000.00

C. Full Name, Mailing Address and ZIP Code

**McDonald's PAC
 One McDonald's Plaza
 Oak Brook, IL 60521**

Receipts For: Primary General
 Other (specify):

Name of Employer

Occupation

Date (month, day, year)

5-06-85

Amount of Cash Received This Period

1000.00

Aggregate Year-to-Date-\$ 1000.00

D. Full Name, Mailing Address and ZIP Code

**The National PAC
 1414 Avenue of the Americas
 New York, NY 10019**

Receipts For: Primary General
 Other (specify):

Name of Employer

Occupation

Date (month, day, year)

5-06-85

Amount of Cash Received This Period

5000.00

Aggregate Year-to-Date-\$ 5000.00

E. Full Name, Mailing Address and ZIP Code

**General Dynamics Vol. PAC
 Pierre Laclède Center
 St. Louis, MO 63105**

Receipts For: Primary General
 Other (specify):

Name of Employer

Occupation

Date (month, day, year)

5-06-85

Amount of Cash Received This Period

500.00

Aggregate Year-to-Date-\$ 500.00

F. Full Name, Mailing Address and ZIP Code

**Tenneco Employees Good Govt. Fund
 P. O. Box 2511
 Houston, TX 77001**

Receipts For: Primary General
 Other (specify):

Name of Employer

Occupation

Date (month, day, year)

5-20-85

Amount of Cash Received This Period

500.00

Aggregate Year-to-Date-\$ 500.00

G. Full Name, Mailing Address and ZIP Code

**KCS Employees PAC
 Kansas City Southern Ind.
 114 W. 11th Street
 Kansas City, MO 64105**

Receipts For: Primary General
 Other (specify):

Name of Employer

Occupation

Date (month, day, year)

5-31-85

Amount of Cash Received This Period

1000.00

Aggregate Year-to-Date-\$ 1000.00

TOTAL of Receipts This Report Period..... 9500.00

TOTAL This Period (See page 10 for number only)

45020470704

SECTION 4

ITEMIZED RECEIPTS

All info. copied from such Reports or Statements may not be sold or used in any period. for the purpose of soliciting contrib. or for commercial purpose other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: McConnell Senate Committee '90

A. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.
 Terra Eastern PAC (Parhandle Eastern Corp)
 P. O. Box 1642 02/30/89 1000.00
 Newton N 77251

Receipt for: Primary Year-to-Date Total: \$ 1000.00

B. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.

FW Corp. Good Government Program

1627 NW K Street #500 04/21/89 500.00
 Washington DC 20006 PAC 06/27/89 1000.00
 06/27/89 500.00

Receipt for: Primary Year-to-Date Total: \$ 2000.00

C. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.

1 McDonald's PAC 05/30/89 5000.00
 One McDonald's Plaza
 Oak Brook IL 60521

Receipt for: General Year-to-Date Total: \$ 5000.00

D. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.

9 National PAC (NATPAC) 06/12/89 5000.00
 555 New Jersey Avenue NW
 Washington DC 20001

Receipt for: Primary Year-to-Date Total: \$ 5000.00

E. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.

Action Com. for Rural Electrification 02/10/89 4000.00
 1800 NW Massachusetts Avenue
 Washington DC 20036 PAC

Receipt for: Primary Year-to-Date Total: \$ 5000.00

F. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.

Action Com. for Rural Electrification 02/10/89 1000.00
 1800 NW Massachusetts Avenue
 Washington DC 20036 PAC

Receipt for: General Year-to-Date Total: \$ 5000.00

SUBTOTAL of Receipts This Page 18000.00

TOTAL This Period

SCHEDULE A

ITEMIZED RECEIPTS

THIS IS A COPY OF THE
 1985 MID-YEAR REPORT
 AND SHOULD BE RETURNED TO THE
 OFFICE OF THE CLERK
 SENATE APP.

Any information derived from such Reports or 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)			
McConnell Senate Committee			
A. Full Name, Mailing Address and ZIP Code Mat. Beer Wholesalers Assoc. c/o Mr. Richard Thornburg 5205 Leesburg Pike, Suite 505 Burke, VA 22015	Name of Employer	Date (month, day, year) 03-12-85	Amount of Each Receipt This Period 1000.00
Receipt For: <input checked="" type="checkbox"/> Retiree <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 1000.00	
B. Full Name, Mailing Address and ZIP Code Red Lobster Emp. Good Govt. Fund P. O. Box 13147 Orlando, FL 32859	Name of Employer	Date (month, day, year) 04-16-85	Amount of Each Receipt This Period 500.00
Receipt For: <input checked="" type="checkbox"/> Retiree <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 500.00	
C. Full Name, Mailing Address and ZIP Code General Mills, Inc. PAC c/o Bob Bird, Director 1200 New Hampshire Avenue, NW Washington, DC 20036	Name of Employer	Date (month, day, year) 04-16-85	Amount of Each Receipt This Period 1000.00
Receipt For: <input checked="" type="checkbox"/> Retiree <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 1000.00	
D. Full Name, Mailing Address and ZIP Code American Horse Council Comm. on Legislation & Taxation 1700 K Street, NW, Ste 300 Washington, DC 20006	Name of Employer	Date (month, day, year) 01-30-85	Amount of Each Receipt This Period 2500.00
Receipt For: <input checked="" type="checkbox"/> Retiree <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 2500.00	
E. Full Name, Mailing Address and ZIP Code I C Industries PAC Pepsi Cola Louisville Bottlers 4008 Crittenden Drive Louisville, KY 40209	Name of Employer	Date (month, day, year) 03-27-85	Amount of Each Receipt This Period 500.00
Receipt For: <input checked="" type="checkbox"/> Retiree <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 500.00	
F. Full Name, Mailing Address and ZIP Code The Don & Bradstreet PAC c/o Charles H. Tower 299 Park Avenue New York, NY 10171	Name of Employer	Date (month, day, year) 01-30-85	Amount of Each Receipt This Period 500.00
Receipt For: <input checked="" type="checkbox"/> Retiree <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 500.00	
G. Full Name, Mailing Address and ZIP Code SATOS, Inc. The Public Policy Action Fund 2900 Citizens Plaza Louisville, KY 40202	Name of Employer	Date (month, day, year) 02-19-85	Amount of Each Receipt This Period 1900.00
Receipt For: <input checked="" type="checkbox"/> Retiree <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 1900.00	
SUBTOTAL of Receipts This Report Period.....			7300.00

7
6
1
0
5
3
0
2
0
5
8

SCHEDULE A

ITEMIZED RECEIPTS

Page 21 of 36
 for Line Number 11

Any info. copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial purposes other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: McConnell Senate Committee '90

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts	Memo
Don A. Bradstreet PAC 600 NW Maryland Avenue Washington DC 20024	PAC	04/23/89 06/17/89	1000.00 4000.00	

Receipt for: Primary Year-to-Date Total: \$ 5000.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts	Memo
ARRDAPAC 1720 L Street, N. W. Washington DC 20005	PAC	04/28/89	2000.00	

Receipt for: Primary Year-to-Date Total: \$ 2000.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts	Memo
Goldman Sachs PAC 1825 Eye Street, N. W. Washington DC 20006	PAC	04/28/89 06/28/89	1000.00 500.00	

Receipt for: Primary Year-to-Date Total: \$ 1500.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts	Memo
Occidental Oil & Gas Corp PAC 110 W. 7th Street #2565 Tulsa OK 74119	PAC	04/25/89	1000.00	

Receipt for: Primary Year-to-Date Total: \$ 1000.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts	Memo
ARCO PAC 1333 NW New Hampshire Ave. Washington DC 20036	PAC	04/25/89	1000.00	

Receipt for: Primary Year-to-Date Total: \$ 1000.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts	Memo
Amoco PAC 200 E. Randolph Drive Chicago IL 60601	PAC	04/28/89 04/28/89 06/16/89	1000.00 1000.00 3000.00	

Receipt for: Primary Year-to-Date Total: \$ 5000.00

SUBTOTAL of Receipts This Page 19500.00

TOTAL This Period

SECTION 2

STERILIZED RECEIPTS
 (Name Schedule A)

Page 1 of 1
 For Line Number 12

Any info copied from such Reports or Statements may not be sold or used in any manner for the purpose of soliciting contrib. or for commercial purposes other than using name & addr. of a political comm. to solicit from the same.

Full Name of Committee: Warner-Nichols Committee

A. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.
 America PAC, The 06/30/89 500.00 JFR
 1776 Eye Street, N. W.
 Washington, DC 20006

Receipt for: Primary Year-to-Date Total: \$ 500.00

B. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.
 Wholesale-Distributor PAC 06/30/89 375.00 JFR
 725 1/2 Street, N. W.
 Washington DC 20006

Receipt for: General Year-to-Date Total: \$ 875.00

C. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.
 Merrill Lynch PAC 06/30/89 300.00 JFR
 1828 L Street
 Washington DC 20036

Receipt for: General Year-to-Date Total: \$ 1500.00

D. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.
 Dun & Bradstreet PAC 06/30/89 625.00 JFR
 600 SW Maryland Avenue
 Washington DC 20024 PAC

Receipt for: General Year-to-Date Total: \$ 5625.00

E. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.
 Goodyear PAC 06/30/89 500.00 JFR
 1144 E. Market Street
 Akron OH 44316

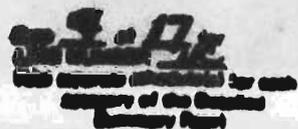
Receipt for: Primary Year-to-Date Total: \$ 500.00

F. Full Name, Address, Zip Employer/Occupation Date Receipts Mem.
 Household Int'l Inc. PAC 06/30/89 375.00 JFR
 2700 Sanders Road
 Prospect Heights IL 60070

Receipt for: Primary Year-to-Date Total: \$ 375.00

SUBTOTAL of Receipts This Page 2875.00

TOTAL This Period



SCHEDULE A

ITEMIZED RECEIPTS

Any information copied from each Report or Statement may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than when the name and address of any political committee is printed on contributions from such committee.

Name of Committee (in Full)
McConnell Senate Committee

A. Full Name, Mailing Address and ZIP Code
**Nat. Ready Mixed Concrete Assoc.
 900 Spring Street
 Silver Spring, MD 20910**

Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Occupation	1-25-85	500.00
Aggregate Year-to-Date-\$ 500.00		

Receipt For: Primary General
 Other (specify):

B. Full Name, Mailing Address and ZIP Code
**Union Camp Corporation PAC
 1600 Valley Road
 Wayne, NJ 07470**

Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Occupation	1-25-85	1000.00
Aggregate Year-to-Date-\$ 1000.00		

Receipt For: Primary General
 Other (specify):

C. Full Name, Mailing Address and ZIP Code
**RJR Good Government Fund
 P. O. Box 718
 Winston-Salem, NC 27102**

Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Occupation	1-25-85	1000.00
Aggregate Year-to-Date-\$ 1000.00		

Receipt For: Primary General
 Other (specify):

D. Full Name, Mailing Address and ZIP Code
**AMPAC
 American Motorcyclist PAC
 P. O. Box 141
 Monticello, TN 37001**

Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Occupation	1-30-85	500.00
Aggregate Year-to-Date-\$ 500.00		

Receipt For: Primary General
 Other (specify):

E. Full Name, Mailing Address and ZIP Code
**Ashland OIL (PAC)
 P. O. Box 391
 Ashland, KY 41114**

Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Occupation	1-30-85	2000.00
Aggregate Year-to-Date-\$ 2000.00		

Receipt For: Primary General
 Other (specify):

F. Full Name, Mailing Address and ZIP Code
**OLEN-PAC
 1700 Citizens Plaza
 Louisville, KY 40202**

Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Occupation	1-30-85	1000.00
Aggregate Year-to-Date-\$ 1000.00		

Receipt For: Primary General
 Other (specify):

G. Full Name, Mailing Address and ZIP Code
**Comm. for Advancement of Cotton
 P. O. Box 12292
 Memphis, TN 38182**

Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Occupation	1-30-85	500.00
Aggregate Year-to-Date-\$ 500.00		

Receipt For: Primary General
 Other (specify):

TOTAL **\$500.00**

R 5 0 2 0 0 7 0 6 9 4

SCHEDULE A

ITEMIZED RECEIPTS

For Line Number 11c

Any info. copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial purpose, other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: McConnell Senate Committee '90

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
RJR. Nabisco PAC Post Office Box 718 Winston-Salem NC 27102		03/10/89	2000.00

Receipt for: Primary Year-to-Date Total: \$ 10000.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
RJR. Nabisco PAC Post Office Box 718 Winston-Salem NC 27102		03/10/89	2000.00

Receipt for: General Year-to-Date Total: \$ 10000.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Free Cuba PAC 8900 SW 117th Avenue Miami FL 33176		03/10/89	2000.00

Receipt for: Primary Year-to-Date Total: \$ 2000.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Mid-Manhattan PAC 275 Madison Avenue New York NY 10016	PAC	03/21/89	2000.00

Receipt for: Primary Year-to-Date Total: \$ 2000.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
SAPAC - Kentucky P. O. Box 209 Frankfort KY 40602	PAC	04/07/89 05/12/89	227.75 2000.00

Receipt for: Primary Year-to-Date Total: \$ 2227.75

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
TRANSPAC P. O. Box 1276 Houston TX 77206	PAC	04/14/89	2200.00

Receipt for: Primary Year-to-Date Total: \$ 2200.00

SUBTOTAL of Receipts This Page 2227.75

TOTAL This Period

FEDERAL ELECTION COMMISSION
 1989-1990
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 7/14/90
 Attachment #1
 PAGE 1 of 3

COMMITTEE	DOCUMENT	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
MCCONNELL SENATE COMMITTEE '90						ID 0C00193342	SENATE	
CONNECTED ORGANIZATION:								
	1989 STATEMENT OF ORGANIZATION - AMENDMENT					5JUN89	4	89SEN/004/0355
	STATEMENT OF ORGANIZATION - AMENDMENT					14JUL89	4	89SEN/004/1586
	STATEMENT OF ORGANIZATION - AMENDMENT					18AUG89	4	89SEN/009/0130
	STATEMENT OF ORGANIZATION - AMENDMENT					25AUG89	5	89SEN/009/0504
	MID-YEAR REPORT	1,926,769		325,948		13AUG89 - 30JUN89	427	89SEN/006/3877
	MID-YEAR REPORT - AMENDMENT	-		-		13AUG89 - 30JUN89	3	89SEN/010/1304
	MID-YEAR REPORT - AMENDMENT	-		-		13AUG89 - 30JUN89	5	90SEN/006/0356
	MID-YEAR REPORT - AMENDMENT	1,926		325,948		13AUG89 - 30JUN89	15	90SEN/009/1029
	REQUEST FOR ADDITIONAL INFORMATION					13AUG89 - 30JUN89	40	89FEC/616/2854
	YEAR-END	428,388		380,197		1JUL89 - 31DEC89	121	90SEN/001/4429
	YEAR-END - AMENDMENT	-		-		1JUL89 - 31DEC89	4	90SEN/006/2873
	YEAR-END - AMENDMENT	-		-		1JUL89 - 31DEC89	4	90SEN/006/2996
	REQUEST FOR ADDITIONAL INFORMATION					1JUL89 - 31DEC89	11	90FEC/630/1261
	1990 STATEMENT OF ORGANIZATION - AMENDMENT					26MAR90	5	90SEN/006/2857
	STATEMENT OF ORGANIZATION - AMENDMENT					26MAR90	2	90SEN/006/2957
	MISCELLANEOUS REPORT TO FEC					17APR90	3	90SEN/008/2332
	APRIL QUARTERLY	362,198		184,627		1JAN90 - 31MAR90	90	90SEN/008/0585
	APRIL QUARTERLY - AMENDMENT	-		-		1JAN90 - 31MAR90	4	90SEN/009/0235
	TOTAL	792,512	0	890,772	0		751	TOTAL PAGES

All reports have been review

Cash on Hand as of 3/31/90 - \$3,017,560

Debts as of 3/31/90 - \$ 148,910

92040914207

FEDERAL ELECTION COMMISSION
1987-1988
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 20APR90

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
MCCONNELL, MITCH	SENATE	REPUBLICAN PARTY					1990 ELECTION	ID# 52KY00012	
1. STATEMENT OF CANDIDATE									
2. PRINCIPAL CAMPAIGN COMMITTEE									
MCCONNELL SENATE COMMITTEE '90								ID #C00193342 SENATE	
1987 MID-YEAR REPORT			161,117		19,657		1JAN87 -30JUN87	42 87SEN/007/0006	
MID-YEAR REPORT - AMENDMENT			-		-		1JAN87 -30JUN87	3 88SEN/010/1237	
MID-YEAR REPORT - AMENDMENT			161,117		21,907		1JAN87 -30JUN87	4 89SEN/004/1773	
REQUEST FOR ADDITIONAL INFORMATION							1JAN87 -30JUN87	4 88FEC/528/2464	
YEAR-END			227,709		41,533		1JUL87 -31DEC87	47 88SEN/003/0007	
YEAR-END - AMENDMENT			227,709		41,533		1JUL87 -31DEC87	4 89SEN/004/1778	
1988 MID-YEAR REPORT			185,411		43,527		1JAN88 -30JUN88	39 88SEN/013/3143	
REQUEST FOR ADDITIONAL INFORMATION							1JAN88 -30JUN88	4 89FEC/599/4765	
YEAR-END				190,105		21,900	1JUL88 -31DEC88	48 89SEN/001/2319	
TOTAL			574,237	190,105	106,967	21,900		195 TOTAL PAGES	
3. AUTHORIZED COMMITTEES									
4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN									

All reports have been reviewed

Cash on hand as of 12/31/88 - \$1,190.977

Debts as of 12/31/88 - \$0

22040914208

FEDERAL ELECTION COMMISSION
1985-1986

DATE 20APR90

CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			

MCCONNELL, MITCH	SENATE	REPUBLICAN PARTY					KENTUCKY	1990 ELECTION	ID# S2KY00012
1. STATEMENT OF CANDIDATE									
1984 STATEMENT OF CANDIDATE							17DEC84		1 84SEN/030/0508
NOTE: THIS DOCUMENT WAS FILED WITH THE COMMISSION DURING A PREVIOUS ELECTION CYCLE. ADDITIONAL FINANCIAL ACTIVITY REPORTED BY THIS CANDIDATE MAY APPEAR ON INDICIES COVERING THAT EARLIER PERIOD									
1985 STATEMENT OF CANDIDATE - AMENDMENT							20SEP85		6 85SEN/009/1459
2. PRINCIPAL CAMPAIGN COMMITTEE									

MCCONNELL SENATE COMMITTEE '90			ID #C00193342 SENATE						
1985	MID-YEAR REPORT		166,983		14,328	1JAN85 -30JUN85	41	85SEN/005/0168	
	MID-YEAR REPORT - AMENDMENT		-			1JAN85 -30JUN85	3	85SEN/008/3120	
	MID-YEAR REPORT - AMENDMENT		-			1JAN85 -30JUN85	4	85SEN/009/2835	
	REQUEST FOR ADDITIONAL INFORMATION					1JAN85 -30JUN85	1	85FEC/388/5127	
	YEAR-END	159,128		41,263		1JUL85 -31DEC85	26	86SEN/001/3660	
	YEAR-END - AMENDMENT	-		-		1JUL85 -31DEC85	3	86SEN/013/2984	
	1'ST LETTER INFORMATIONAL NOTICE					1JUL85 -31DEC85	1	86FEC/404/0488	
1986	MID-YEAR REPORT	152,824		9,704		1JAN86 -30JUN86	42	86SEN/017/1104	
	MID-YEAR REPORT - AMENDMENT		152,824		16,454	1JAN86 -30JUN86	4	89SEN/004/1763	
	1'ST LETTER INFORMATIONAL NOTICE					1JAN86 -30JUN86	5	86FEC/429/4999	
	YEAR-END		164,476		13,614	1JUL86 -31DEC86	41	87SEN/001/0195	
	YEAR-END - AMENDMENT		164,476		15,864	1JUL86 -31DEC86	4	89SEN/004/1768	
	TOTAL	311,952	484,283	50,967	46,646		175	TOTAL PAGES	

3. AUTHORIZED COMMITTEES									
MCCONNELL SENATE COMMITTEE			ID #C00155051 SENATE						
1985	MID-YEAR REPORT	152,319		99,664		1JAN85 -30JUN85	35	85SEN/007/0683	
	MID-YEAR REPORT - AMENDMENT	-		-		1JAN85 -30JUN85	3	85SEN/009/1917	
	MID-YEAR REPORT - AMENDMENT	-		-		1JAN85 -30JUN85	2	85SEN/009/2833	
	REQUEST FOR ADDITIONAL INFORMATION					1JAN85 -30JUN85	3	85FEC/388/5179	
	YEAR-END	2,560		82,656		1JUL85 -31DEC85	9	86SEN/001/2814	
1986	MISCELLANEOUS REPORT FROM FEC					22MAY86	1	86FEC/415/1270	
	TERMINATION REPORT					2 1JAN86 -30APR86	5	86SEN/011/2913	
	TERMINATED						58	TOTAL PAGES	

4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN									
All reports have been reviewed									
58 AUTH TOT PAGES									
58 AUTH TOT PAGES									

	1990 CMTE	1984 CMTE
Cash on hand as of 12/31/86	\$555,502	\$0
Debts as of 12/31/86	0	0

2040914209



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20541

BQ-2

DEC 5 1989

Mr. Larry J. Steinberg, Treasurer
McConnell Senate Committee '90
P.O. Box 1496
Louisville, KY 40201

Identification Number: C00193342

Reference: Mid-Year Report (1/1/89-6/30/89)

Dear Mr. Steinberg:

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 (pertinent portion attached) discloses several contributions which appear to exceed the limits set forth in the Act. No individual or political committee other than a qualified multicandidate committee may make contributions to a candidate for Federal office in excess of \$1,000 per election. Reports on file with the Commission disclose that the Tennessee Walking Horse Breeders and Exhibitors Association PAC did not become a qualified multicandidate until July 31, 1989. Additionally, a qualified multicandidate committee may not make a contribution to a candidate 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. (2 U.S.C. 441(a) and (f); 11 CFR 110.1(b) and (e))

-Reports on file with the Commission disclose a transfer to your committee from the McConnell Senate Committee ("the '84 Committee) in the amount of \$81,309. The transfer includes contributions received by the '84 Committee after the 1984 General Election. These contributions should have been accepted by the '84 Committee only to the extent that they had outstanding debts remaining from the general election. (11 CFR 110.1(b)(3)(i)) Review of the '84 Committee's reports indicate that the contributions exceeded the outstanding net debt amount by \$90,654, this amount \$81,309 was transferred to your committee. The Commission in order to determine which contributions made up this transfer amount has used the last in first out (LIFO) method.

72040314290

Please note, all contributions received by the '94 Committee from August 5, 1993 back to January 25, 1994, plus \$15,384 of the contributions received on January 11, 1993 appear to be in excess of its outstanding net debts; therefore, these contributions should have been refunded or redesignated for the 1990 election. Since these funds were transferred to your committee, the contributions should be considered made for the 1990 primary election and aggregated with all subsequent contributions received from these individuals or political committees.

If the contributions in question were incompletely or incorrectly reported, you should amend your original report with the clarifying information. If the contributions you received exceed the limit, you should either refund to the donors the amount in excess of \$1,000 or \$5,000 as appropriate, or have the donors redesignate the contributions in writing for the 1990 election. The Commission should be notified if refunds are necessary. Refunds are reported on Line 20 of the Detailed Summary Page and on Schedule B of the report covering the period in which the refunds 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) and (4))

Although the Commission may take further legal steps, prompt action by you to refund or seek redesignation of the excessive amounts 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 Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 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) 376-2480.

Sincerely,



Pat Sheppard
Senior Reports Analyst
Reports Analysis Division

Attachments

9-2-94 162835

McConnell Senate Committee '90
P.O. Box 1496
Louisville, Kentucky 40201

Larry J. Steinberg
Treasurer
(502) 584-2337

RECEIVED
SENATE OF THE COMMONWEALTH OF KENTUCKY
DEC 25 AM 8:32

December 18, 1989

Secretary of the Senate
232 Hart Senate Office Building
Washington, DC 20510

Re: Mid-Year Report (January 1, 1989 - June 30, 1989)

Gentlemen:

In response to a letter dated December 5, 1989 from Ms. Pat Sheppard of the Federal Election Commission, please be advised as follows:

We were not aware that the Tennessee Walking Horse Breeders and Exhibitors Association did not become a qualified multicandidate PAC until July 31, 1989. Accordingly, we will refund \$4,000 received from them for both the primary and general elections (a total of \$8,000). This will be reflected on the December 31, 1989 year-end report.

[The other amounts which are referred to in Ms. Sheppard's letter are being researched further, and amended returns will be filed.]

Very truly yours,

Larry J. Steinberg

Larry J. Steinberg
Treasurer

Sv...

89020041002113402412

MEMORANDUM TO FILES:
XX Telecon
Visit

DATE: February 1, 1990

NAME OF THE COMMITTEE: McConnell Senate Committee '90

SUBJECT: Response to December 5, 1989 Request for Additional Information ("RFAI")

FEC REP: Pat Sheppard

COMMITTEE REP: Larry J. Steinberg, Treasurer (502) 584-2337

22040914213

I called Mr. Steinberg to inform him that I had received the Committee's 1989 Year End report and that I did not see where the Committee had responded to any of the apparent excessive contributions noted in the RFAI. Mr. Steinberg stated that he had 60 days from becoming aware of the violation to correct the violation. With reluctance, I explained that it was sixty days from receipt of the contribution and if he was still under the impression that it was sixty days from becoming aware of the violation than his sixty days were almost up. Mr. Steinberg stated that he did understand the letter and recognized the fact that there are some contributions that need to be redesignated and reattributed and possibly refunded. However, he does not agree with the amount. Mr. Steinberg feels that the amount aggregated with the 1990 Committee should be \$12,000 less than the amount we stated because at least \$12,000 in refunds and rebates made up the \$81,309 transferred into the Committee. I explained to him how we came up with this figure and told him that we did take refunds and rebates into account as cash on hand. I also explained that if he decided to disagree on this issue than he can look at the contributions mentioned on the 11th of January as funds to represent the refunds and rebates that he spoke of. However, this would not take away from the individuals or political committee referenced in the letter because these contributions were received after this date.

He asked what was needed to respond to the RFAI. I asked him if he had mailed and received answers from the individuals and committees referenced in the report. He said he had not mailed anything but had spoken to several of them. I told him that he should send in a written response detailing what it is he plans on doing. He stated that he would draft a letter and give me a call back to see if it was adequate .

ATTACHMENT # 5
PAGE 1 OF 1

MEMORANDUM TO FILES:
Telecon XX
Visit

DATE: February 2, 1990

NAME OF THE COMMITTEE: McConnell Senate Committee '90

SUBJECT: Response to RFAI

FEC REP: Pat Sheppard

COMMITTEE REP: Larry J. Steinberg, Treasurer

Mr. Steinberg called to read the response to me that he had prepared. It stated that several of the contributions had either been refunded or redesignated and that the remaining ones would be redesignated soon. Mr. Steinberg also noted his disagreement with the amount of contributions to be attributed to the 1990 Primary Election. He said that he would mail the response today and that the Commission should receive it no later than Monday, February 5, 1990.

72040914214

McConnell Senate Committee '90

P.O. Box 1496

Louisville, Kentucky 40201

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 FEB -7 PM 12:07

February 2, 1990

Ms. Pat Sheppard
Senior Reports Analyst
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
90 FEB -7 PM 4:05
HAND DELIVERED

Dear Ms. Sheppard:

With regard to your letter of December 5, 1989, please be advised as follows:

Mr. Harry S. Frazier, Jr. - The two contributions of \$1,000 each reflected in the June 30, 1985 report for Mr. Harry S. Frazier, Jr. should have been reported as Mrs. Harry S. Frazier, Jr. Although I thought that we had filed an appropriate amendment to our June 30, 1985 report, all I could find in my files was a copy of a letter dated August 2, 1985 to the Secretary of the Senate, a copy of which is attached. I will look some more for the amendment; if we have not filed one, I will do so.

Mr. Joseph McCoy - The \$250 contribution reported January 25, 1985 will be redesignated in writing as a contribution for the 1990 General election.

AT&T PAC - The \$500 contribution reported April 16, 1985 has been redesignated in writing to the 1990 General election.

American Dental PAC - The \$5,000 contribution reported January 25, 1985 will be redesignated in writing \$4,000 to the 1990 Primary election and \$1,000 to the 1990 General election.

American Medical PAC - The \$3,200 contribution reported January 30, 1985 will be redesignated in writing to the 1990 General election.

Ashland Oil PAC - The \$2,000 contribution reported January 30, 1985 has been refunded.

Associated General Contractors of America PAC - The \$500 contribution received February 19, 1985 will be redesignated in writing to the 1990 General election.

90020060356
40914215

SCHEDULE A

ITEMIZED RECEIPTS

MEMO - REDESIGNATIONS

Any information copied from such Reports and Statements may not be sold or used by any person for any purpose, other than using the name and address of any political committee to solicit contributions.

NAME OF COMMITTEE (in Full)

McConnell Senate Committee '90

9702024003104624108

A. 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 > \$	
B. Full Name, Mailing Address and ZIP Code Peter J. Sehlinger 2223-D Rome Drive Indianapolis, IN 46208	Name of Employer redesignated	Date (month, day, year) 3/31/90	Amount of Each Receipt this Period 30 memo
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
C. Full Name, Mailing Address and ZIP Code Leslie Rose 229 Lone Pine Road Bloomfield Hills, MI 48013	Name of Employer redesignated Self-employed businessman	Date (month, day, year) 3/31/90	Amount of Each Receipt this Period 250 memo
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
D. Full Name, Mailing Address and ZIP Code Jennifer R. Marshall Route 3 Poplar Street Russellville, KY 42276	Name of Employer redesignated	Date (month, day, year) 3/31/90	Amount of Each Receipt this Period 20 memo
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
E. Full Name, Mailing Address and ZIP Code Irving Rose Box 937 Southfield, MI 48037	Name of Employer redesignated Self-employed businessman	Date (month, day, year) 3/31/90	Amount of Each Receipt this Period 500 memo
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code Joseph McCoy 881 Corporate Drive, Suite 206 Lexington, KY 40503	Name of Employer redesignated McCoy Enterprises	Date (month, day, year) 3/31/90	Amount of Each Receipt this Period 250 memo
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code Terrell A. Lassetter 1327 E. Barton Creek Circle Bountiful, UT 84010 (previously at Lexington, KY)	Name of Employer redesignated	Date (month, day, year) 3/31/90	Amount of Each Receipt this Period 50 memo
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

MEMO-REDESIGNATIONS

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of obtaining 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)

McCConnell Senate Committee '90/

90030030642

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Barnett People for Better Government Inc. Federal P. O. Box 5257 Tallahassee, FL 32314	redesignated	3/31/90	1,000 memo
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	Redesignated
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Kansas City Southern Industries 114 West Island Avenue, NW Kansas City, MO 64105	Redesignated	3/31/90	1,000 memo
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Commodity Futures Political 30 S. Wacker Drive Chicago, Illinois 60606	redesignated	3/31/90	1,000 memo
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
FMC Good Government Program 200 East Randolph Drive Chicago, Illinois 60601	Redesignated	3/31/90	1,000 memo
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
General Dynamics Voluntary Political Contribution Plan Pierre Laclede Center St. Louis, Missouri 63105	redesignated	3/31/90	500 memo
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
A T & T 550 Madison Avenue New York, NY	redesignated	1/5/90	500 memo
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Texas Eastern Corp. PAC P. O. Box 2521 Houston, Texas 77001	redesignated	3/31/90	1,000 memo
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMS AND RECEIPTS

MEMO - REDESIGNATIONS

Any information copied from such Reports and Statements may not be sold or used by any person for purposes other than using the name and address of any political committee to solicit contributions.

NAME OF COMMITTEE (in Full)

McConnell Senate Committee '90

92004200901040262404

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Credit Union Legislative Action Council of Credit Union National Association 805 15th Street, Washington, DC	redesignated	3/31/90	1,000 memo
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
The Kroger Better Government Committee P. O. Box 1995 Cincinnati, OH 45201	redesignated	3/31/90	1,000 memo
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Illinois Tool Works Inc. PAC 81501 W. Higgins Road Chicago, Illinois	redesignated	3/31/90	500 memo
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Automobile & Truck Dealers Election Action Committee 8400 West Park Drive McLean, VA 22101	redesignated	3/31/90	500 memo
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
American Motorcyclist Political Action Committee P. O. Box 141 Westerville, OH 43081	redesignated	3/31/90	500 memo
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
BUILD PAC of the National Assoc. of the National Association Homebuilders National Housing Center, 15th & M St Washington, DC	redesignated	1/03/90	5,000 memo
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Committee For Advancement of Cotton P. O. Box 12292 Memphis, TN 38182	redesignated	3/31/90	500 memo
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

1990 April Quarterly Report

Attachment #8

Page 4 of 5

MEMO - REDESIGNATIONS

Any information copied from such Reports and Statements may not be sold or used by any person for any purpose, other than using the name and address of any political committee to solicit contributions.

NAME OF COMMITTEE (in Full)

McConnell Senate Committee '90

9004000645

A. Full Name, Mailing Address and ZIP Code	Name of Employer redesignated	Date (month, day, year)	Amount of Each Receipt this Period
Glen-PAC 1700 Citizens Plaza Louisville, KY 40202 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		3/31/90	1,000memo
B. Full Name, Mailing Address and ZIP Code	Name of Employer redesignated	Date (month, day, year)	Amount of Each Receipt this Period
Good Government Committee of J.P. Stevens & Co., Inc. P. O. Box 71 West Point, GA 31833 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		3/31/90	1,000 memc
C. Full Name, Mailing Address and ZIP Code	Name of Employer redesignated	Date (month, day, year)	Amount of Each Receipt this Period
Civic Involvement Program General Motors 3044 W. Grand Blvd. Detroit, MI 48202 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		3/31/90	1,000 memc
D. Full Name, Mailing Address and ZIP Code	Name of Employer redesignated	Date (month, day, year)	Amount of Each Receipt this Period
Great-Linc PAC No. 1 Financial Square Louisville, KY 40270 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		3/31/90	1,000 mem.
E. Full Name, Mailing Address and ZIP Code	Name of Employer redesignated	Date (month, day, year)	Amount of Each Receipt this Period
American Dental Pac PoliticalFnd 1101 17th Street NW, Suite 1002 Washington, DC 20036 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		1/10/90	5,000 memc
F. Full Name, Mailing Address and ZIP Code	Name of Employer redesignated	Date (month, day, year)	Amount of Each Receipt this Period
National Aggregates PAC FKA Nat. Sand & Gravel & Nat. Ready Mixed Concrete Assoc. PAC 900 Spring St Silver Spring, MD Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		3/31/90	500memo
G. Full Name, Mailing Address and ZIP Code	Name of Employer redesignated	Date (month, day, year)	Amount of Each Receipt this Period
R. R. Donnelley & Sons PAC 2223 S. Martin Luther King, Jr. Chicago, Illinois 60616 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		3/31/90	500 memo

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

McConnell Senate Committee '90
 Refunds and Redesignations
 April 1 through April 3, 1990

Name Date Amount

9 of 00 2 0 0 9 1 0 2 3 64

PACs Refunded:

National Rifle Association	4-3-90	4,950
Steak & Ale Restaurant Corp. PAC	4-3-90	500
McDonald's PAC	4-3-90	1,000
The National PAC	4-3-90	5,000
Mobil Oil Corporation PAC	4-3-90	2,500
Tenneco Employees Good Government Fund	4-3-90	2,500
Peabody Political Action Committee	4-3-90	1,000
National Society of Professional Engineers	4-3-90	2,500
Texas Utilities Company PAC	4-3-90	600
Outdoor Advertising PAC	4-3-90	1,000
Northrop Employees PAC	4-3-90	1,000
Lone Star Steel PAC	4-3-90	500
Coca Cola Co. Nonpartisan Committee for Good Government	4-3-90	250
Litton Employees PAC	4-3-90	2,000
Kentucky Educational Medical PAC	4-3-90	1,800
TxPAC	4-3-90	500
Trane Political Action Committee	4-3-90	500
Associated Builders & Contractors	4-3-90	1,000
Wausau Insurance Co. PAC	4-3-90	250
Effective Political Action Committee	4-3-90	500
Union Pacific Fund for Effective Government -	4-3-90	2,000
Boise Cascade Corp PAC	4-3-90	1,000
Union Camp Corp PAC	4-3-90	1,000
Total PACs refunded		<u>33,850</u>

PACs Redesignated:

Contel PAC	4-2-90	500
USX Steel PAC (formerly US Steel Good Government Fund)	4-2-90	<u>1,000</u>
Total PACs redesignated		<u>1,500</u>

Individuals Refunded:

James F. McCoy	4-3-90	100
Jack A. Robinson	4-3-90	250
Max Gendelman	4-3-90	250
William A. Yolles	4-3-90	250
Leonard H. Lerner	4-3-90	250
Steven I. Victor	4-3-90	250
Norman Katz	4-3-90	250
Leonard McCoy	4-3-90	250
Robert J. Begley	4-3-90	150
Randall H. Leslie	4-3-90	100
Cecil Kimbleton	4-3-90	<u>25</u>
Total individuals refunded		<u>2,125</u>



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20541

BQ-2

Larry J. Steinberg, Treasurer
McConnell Senate Committee '90
P.O. Box 1496
Louisville, KY 40201

MAR 7 1991

Identification Number: C00193342

Reference: Year End Report (7/1/89-12/31/89)

Dear Mr. Steinberg:

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:

-Line 12, Column A, of the Detailed Summary Page discloses \$9,946 in transfers. Memo Schedules A supporting Line 12 itemizes \$7,075 in transfers. Please explain this discrepancy and amend your report(s) accordingly. (11 CFR §104.3(a)) Please note that the Memo Schedules A should itemize your gross share of the joint fundraising receipt. If any contributions are less than \$200 and do not need to be itemized, please give a total amount of these contributions on the last page of the Memos.

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limit set forth in the Act. A qualified multicandidate committee may not make a contribution to a candidate for federal office in excess of \$5,000 per election. (2 U.S.C. §441a(a) and (f); 11 CFR §110.2(b))

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeds the limit, you should refund to the donor the amount in excess of \$5,000 or get the donor to redesignate the contribution in writing. Refunds and redesignations must be made within sixty days of the treasurer's receipt of the contribution. Copies of refund checks and copies of letters redesignating the contributions in question may be used to respond to this letter. Refunds are reported

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on Line 20 of the Detailed Summary Page and on 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) and (4))

Although the Commission may take further legal steps, prompt action by you to refund or seek redesignation of the excessive amount(s) will be taken into consideration.

-Your report discloses a partnership contribution on Line 11(c) of the Detailed Summary Page. Note that this contribution should be disclosed on Line 11(a)(1) and itemized on the appropriate supporting Schedule.

-Expenditures to several credit cards totaling \$933.63 have been disclosed. When itemizing payments made to credit card companies you must list the name and address of the original vendor from which you purchased an item or a service. You should also show the date, the amount, and the purpose of the payment if you have paid more than \$200 this year to the vendor. (11 CFR §104.9)

-For future reports, please be advised that you should provide the complete name of any political committee that has contributed to your committee. Reporting only the name of the connected organization is not adequate.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 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) 376-2480.

Sincerely,

Pat Sheppard
Senior Reports Analyst
Reports Analysis Division

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Mr. Pat Sheppard
March 22, 1990
Page 2

Amended 1989 Year End Report
Attachment #11
Page 2 of 2

We have analyzed payments totaling \$933.63 to credit card companies to determine whether payments in excess of \$200 for 1989 had been made to any one of the original vendors. We noted a few instances in which these payments did exceed \$200, and will file an amendment to our December 31 report to report these amounts. In future reports, we will report payments to credit card companies as payments to the original vendors.

While we have tried to include the complete name of any political committee, sometimes this gets by us. Sorry. Our intent is always to include the complete name.

I believe that this is responsive to the issues you raised. If you need additional information, please let me know.

Very truly yours,

Larry J. Steiner

Larry J. Steiner
Treasurer

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RECEIVED
FEDERAL ELECTION COMMISSION
FEDERAL SECRETARY

**FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463**

FIRST GENERAL COUNSEL'S REPORT

**RAD Referral: #90L-20
Staff Member: Debby Curry**

SOURCE: INTERNALLY GENERATED

**RESPONDENTS: McConnell Senate Committee '90 and
Larry J. Steinberg, as treasurer**

**RELEVANT STATUTES: 2 U.S.C. § 431(8)(A)
2 U.S.C. § 434(b)
2 U.S.C. § 441a(a)
2 U.S.C. § 441a(f)
11 C.F.R. § 102.6
11 C.F.R. § 103.3
11 C.F.R. § 110.1
11 C.F.R. § 110.2**

**INTERNAL REPORTS
CHECKED: McConnell Senate Committee
McConnell Senate Committee '90**

**FEDERAL AGENCIES
CHECKED: None**

I. GENERATION OF MATTER

This matter was generated by the Reports Analysis Division ("RAD") after a review of the disclosure reports of McConnell Senate Committee (hereinafter "McConnell 1984 Committee") and McConnell Senate Committee '90 (hereinafter "McConnell 1990 Committee"). The RAD review revealed that the McConnell 1990 Committee had accepted excessive contributions totaling \$26,875 in 1989. The referral notes that of the total excessive amount (\$26,875), \$3,800 was not identified during normal review but was discovered in the review of the reports in preparation of the referral.

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II. FACTUAL AND LEGAL ANALYSIS

A. Facts

According to the RAD review and reports on file at the Commission, the McConnell 1990 Committee accepted \$26,875 in apparent excessive contributions in 1989.^{1/} These contributions were made by two (2) individuals and 15 qualified multicandidate committees. The apparent excessive contributions fall into two categories.

1. CATEGORY A TYPE EXCESSIVES

Category A type excessives involve contributions accepted directly by the McConnell 1990 Committee from one (1) individual and five (5) qualified multicandidate political committees. On reports filed at the Commission, the McConnell 1990 Committee designated these contributions as attributable to the 1990 primary. When aggregated, the contributions received by the McConnell 1990 Committee from the contributors listed below exceeded the contribution limits of the Act. (Attachment 1, pages 1-10).

1. The McConnell 1990 Committee was not notified of an apparent excessive contribution of \$125 from Ice Cream and Milk PAC until March 7, 1990. (Attachment 1, page 5 and page 73). Additionally, RAD noted that the McConnell 1990 Committee was not notified of an additional \$3,800 in apparent excessive contributions (Jack Ruth, American & Kentucky Medical PAC and RJR Good Government Fund.) These entities are noted on Chart A and B with an asterisk (*).

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CHART A

CONTRIBUTOR	AMOUNT	RECEIPT DATE	COMMITTEE'S DESIGNATION	AMOUNT IN EXCESS
Jack E. Ruth	\$1,000.00	22-MAY-1987	PRIMARY 90	
	\$1,000.00	08-JUN-1989	*PRIMARY 90	\$1,000.00
	\$1,000.00	08-JUN-1989	GENERAL 90	
Associated General Contractors of America	\$500.00	19-FEB-1985	PRIMARY 90	
	\$5,000.00	21-APR-1989	PRIMARY 90	\$500.00
Ice Cream and Milk PAC	\$500.00	04-MAR-1985	PRIMARY 90	
	\$2,000.00	26-MAY-1989	PRIMARY 90	
	\$625.00	30-JUN-1989	PRIMARY 90	
	\$2,000.00	08-NOV-1989	PRIMARY 90	\$125.00
PAC of Dun & Bradstreet	\$500.00	30-JAN-1985	PRIMARY 90	
	\$1,000.00	28-APR-1989	PRIMARY 90	
	\$4,000.00	12-JUN-1989	PRIMARY 90	\$500.00
	\$625.00	30-JUN-1989	GENERAL 90	
American and Kentucky Medical PACs ^{3/}	N/A	N/A	N/A	
			TOTAL	\$2,125.00

2. CATEGORY B TYPE EXCESSIVES

Category B type excessives involve the acceptance of contributions in excess of the McConnell 1984 Committee's net debts outstanding and as a result of \$81,309 in transfers from the McConnell 1984 Committee to the McConnell 1990 Committee. According to Commission reports, \$81,309 was transferred from the McConnell 1984 Committee to the McConnell 1990 Committee on August 14, 1985 (\$80,186) and September 18, 1985 (\$1,123). The

3. American Medical PAC and Kentucky Medical PAC are affiliated committees and share a single contribution limit under the Act. The American and Kentucky Medical PACs exceeded the limits on the basis of contributions made to the McConnell 1990 Committee. Additionally, American Medical PAC and Kentucky Medical PAC made contributions that involve Category B type excessives. For purposes of analysis, in this report American Medical PACs and Kentucky Medical PAC's contributions, excessives and refunds are considered in Chart B.

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source of the transfer were contributions received by the McConnell 1984 Committee after the date of the 1984 general election. These contributions were designated on the reports of the McConnell 1984 Committee for the 1984 general election. The \$81,309 transferred appears to be in excess of the McConnell 1984 Committee's net debts outstanding.

The RAD review indicates that as of November 26, 1984, the McConnell 1984 Committee disclosed cash-on-hand of \$24,770 and \$40,084 in outstanding debts and obligations. From November 27, 1984, until termination of the 1984 McConnell Committee in 1986, the McConnell 1984 Committee raised \$192,627 in contributions, received \$11,614 in refunds, rebates and other receipts and made \$138,356 in expenditures to wind down the 1984 campaign and retire outstanding debts and obligations. (Attachment 1, pages 1-3). As part of the referral, RAD calculates that the McConnell 1984 Committee had received \$90,655 in excess of necessary debt retirement and winding down costs. (Attachment 1, page 11). Because the McConnell 1990 Committee failed to provide a memorandum schedule for the transfer, RAD used the last in first out method ("lifo") to determine the composition of the transferred funds.

Review of the McConnell 1990 Committee's 1989 Mid-Year report revealed that when the contributions made by contributors that were the source of the transfer were aggregated with subsequent contributions of these contributors, the McConnell 1990 Committee had accepted excessive contributions. As a result of the aggregation of contributions received by the McConnell 1990

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Committee from the contributors listed below who also made post-election contributions to the McConnell 1984 Committee, the McConnell 1990 Committee accepted apparent excessives totaling \$21,550 from one (1) individual and twelve (12) qualified multicandidate political committees.

CHART B

CONTRIBUTOR	AMOUNT	RECEIPT DATE	COMMITTEE'S DESIGNATION	AMOUNT IN EXCESS
Joseph McCoy	\$250.00	25-JAN-1985	GENERAL 84	
	\$1,000.00	15-MAY-1989	PRIMARY 90	\$250.00
3 A T & T PAC	\$500.00	16-APR-1985	GENERAL 84	
	\$2,500.00	19-DEC-1988	PRIMARY 90	
2	\$1,750.00	29-JUN-1989	PRIMARY 90	
4	\$750.00	30-JUN-1989	PRIMARY 90	\$500.00
American Dental PAC	\$5,000.00	25-JAN-1985	GENERAL 84	
9	\$1,000.00	26-MAY-1989	PRIMARY 90	\$1,000.00
0 Ashland Oil (PACE)	\$2,000.00	30-JAN-1985	GENERAL 84	
4	\$5,000.00	10-MAR-1989	PRIMARY 90	\$2,000.00
0	\$5,000.00	15-MAY-1989	GENERAL 90	
2 Build PAC of the Nat. Asso. of Homebuilders	\$5,000.00	30-JAN-1985	GENERAL 84	
	\$5,000.00	29-JUN-1989	PRIMARY 90	\$5,000.00
Dairymen, Inc. PAC	\$1,000.00	04-MAR-1985	GENERAL 84	
	\$2,000.00	11-OCT-1988	PRIMARY 90	
	\$3,000.00	26-MAY-1989	PRIMARY 90	\$1,000.00
	\$4,000.00	26-MAY-1989	GENERAL 90	
	\$800.00	13-OCT-1989	GENERAL 90	

Dealers Election Action Comm.	\$500.00	04-MAR-1985	GENERAL 84	
	\$2,000.00	20-FEB-1986	PRIMARY 90	
	\$2,000.00	15-MAY-1989	PRIMARY 90	
	\$500.00	12-JUN-1989	PRIMARY 90	
	\$500.00	30-JUN-1989	PRIMARY 90	\$500.00
Mobil Oil Corp. PAC	\$2,500.00	16-APR-1985	GENERAL 84	
	\$5,000.00	30-JUN-1989	PRIMARY 90	\$2,500.00
National Federation of Independent Businesses PAC	\$1,000.00	12-MAR-1985	GENERAL 84	
	\$2,000.00	29-JUN-1989	PRIMARY 90	
	\$3,000.00	30-JUN-1989	PRIMARY 90	\$1,000.00
National PAC	\$5,000.00	06-MAY-1985	GENERAL 84	
	\$5,000.00	12-JUN-1989	PRIMARY 90	\$5,000.00
RJR Good Government Fund	\$1,000.00	25-JAN-1985	GENERAL 84	
	\$5,000.00	10-MAR-1989	*PRIMARY 90	\$1,000.00
	\$5,000.00	10-MAR-1989	GENERAL 90	
American and Kentucky Medical PACs				
1. American Medical PAC	\$3,200.00	30-JAN-1985	PRIMARY 90	
	\$1,000.00	15-MAY-1989	PRIMARY 90	\$1,000.00
2. Kentucky Medical PAC	\$1,800.00	30-JAN-1985	GENERAL 84	
	\$4,000.00	15-MAY-1989	*PRIMARY 90	\$4,000.00
			TOTALS	\$24,750.00

3. RAD COMMUNICATIONS

On December 5, 1989, a RFAI noted the apparent excessive contributions as a result of both Category A type and Category B type excessives. (Attachment 1, pages 58-59). With respect to the transfer (\$81,309) from the McConnell 1984 Committee to the McConnell 1990 Committee, the RFAI indicated that the transfer had included funds received by the 1984 Committee after the date

of the 1984 general election. The RFAI noted that such funds could only be accepted to the extent that the McConnell 1984 Committee had debts remaining from the 1984 general election. The RFAI explained that a LIFO analysis was used to determine that the McConnell 1984 Committee's receipt of contributions exceeded its net debt and winding down costs by \$90,654.

The RFAI indicated that since the contributions appeared to be in excess of the Committees net debt, these contributions should have been refunded or redesignated for the 1990 election. The RFAI noted further that since these funds were transferred from McConnell 1984 Committee to the McConnell 1990 Committee the contributions should be considered made for the 1990 primary election and aggregated with subsequent contributions by the same contributors to the McConnell 1990 Committee. Finally, the RFAI requested the refund or redesignation of any contributions found to be in excess of the contribution limits of the Act.

Though the McConnell 1990 Committee contacted the RAD analyst by phone to discuss the matter in December 1989 and February 1990, the McConnell 1990 Committee did not submit a written response to these issues until February 7, 1990. (Attachment 1, pages 4, 61-62). While the response indicated that the apparent excessive contributions had either been refunded, redesignated or would be redesignated, the Committee did not provide dates for these transactions. (Attachment 1, pages 4, 63-65). The McConnell 1990 Committee's 1990 April Quarterly report contained memo entries for \$12,250 in refunds or redesignations of excessive contributions. (Attachment 1,

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page 66-70). On April 23, 1990, the McConnell 1990 Committee listed refunds or redesignations to be disclosed in its 1990 12 Day Pre-primary report. (Attachment 1, pages 4, 71-72). This list disclosed that an additional \$9,300 had been refunded. To date a total of \$24,750^{4/} out of \$26,875 in excessive contributions has been redesignated or refunded by the McConnell 1990 Committee. Consequently, the McConnell Committee has an outstanding balance of \$2,125 in apparent excessive contributions to be redesignated or refunded.

Telephone conversations and written correspondence to the Commission from the McConnell 1990 Committee suggest substantial agreement with RAD's analysis of the matter. The McConnell 1990 Committee disagrees strongly, however, with respect to two issues regarding these transactions. First, the McConnell 1990 Committee has disputed on several occasions the amount of apparent excessive contributions based on the McConnell 1990 Committee's aggregation of contributions by contributors that made 1984 post-general election contributions and 1990 contributions. (Attachment 1, pages 4, 61-65). In this regard, the McConnell 1990 Committee contends that the aggregate amount of contributions to be refunded or redesignated should be \$69,700.^{5/} According to the McConnell 1990 Committee, this amount

4. Subsequent to the RAD's referral of the matter to this office, the McConnell 1990 Committee made an additional refund of \$3,200 to American Medical PAC on October 17, 1990.

5. The McConnell 1990 Committee's response notes that ultimately \$75,960 of the \$81,309 transferred from the 1984 Committee was treated as subject to redesignation or refund. (Attachment 1, page 71). According to the McConnell 1990 Committee, the higher

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represents the total transfer (\$81,311.18) less interest and refunds of \$11,611.18.^{6/} A RAD analyst explained to the McConnell 1990 Committee that interest and refunds had in fact been taken into account in determining the amount in excess of the Committee's net debt. (Attachment 1, pages 61).

Additionally, the McConnell 1990 Committee disagrees with the Commission's interpretation of the time frame for refunds and redesignations. (Attachment 1, pages 61, 65, 71). A RAD Analyst informed the Committee of the sixty day time limit on redesignations or refunds. Initially, the McConnell Committee contended that the sixty days ran from when they became aware of the violation. (Attachment 1, page 61). Subsequently, the McConnell 1990 Committee expanded on this contention, indicating that the sixty day period should run from the date the Committee determines that the Commission's assertion is correct. (Attachment 1, page 65).

B. CATEGORY A TYPE EXCESSIVES

1. Law

Pursuant to 2 U.S.C. § 441a(a)(1)(A), it is unlawful for any person to make contributions to any candidate and his authorized committee with respect to any election for federal office which,

(Footnote 5 continued from previous page)
figures occurred due to an overzealous staff worker who traced the transfer further back than instructed. (Attachment 1, page 65). Since corrective action had occurred, the McConnell 1990 Committee did not seek to undo these transactions.

6. There is a slight discrepancy between these figures and the figures derived from reports on file at the Commission (transfer of \$81,309 and interest and refunds of \$11,614).

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in the aggregate, exceed \$1,000. Additionally, it is unlawful for multicandidate political committees to make contributions to any candidate and his authorized committee with respect to any election for federal office which, in the aggregate, exceed \$5,000. 2 U.S.C. § 441a(a)(2)(A). 2 U.S.C. § 441a(f) prohibits a candidate or committee from knowingly accepting contributions in violation of the contribution limitations of the Act.

2. Analysis

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The reports on file at the Commission indicate that the McConnell Committee may have accepted excessive contributions. As noted in Chart A, these contributions were made directly to the McConnell 1990 Committee and the contributions were designated for the 1990 primary. As can be seen from Chart A, these contributions aggregated in excess of the 1990 primary limit for individuals or multicandidates committees during 1989. The excessive contributions accepted by McConnell 1990 Committee as a result of Category A type excessive contributions totaled \$2,125.

C. CATEGORY B TYPE EXCESSIVES

1. Law

The Act's contribution limitations apply separately with respect to each election in which an individual is a candidate regardless of when the contribution is made. 2 U.S.C. §§ 441a(a)(1)(A), 441a(a)(2)(A) and 441a(a)(6). The term "contribution" is defined as "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. § 431(8)(A)(i).

11 C.F.R. § 110.1(a)(2)(i) (1986) provided that "with respect to any election" means that contributions designated in writing by the contributor for a particular election are attributable to the limit set for that election.^{7/} An exception exists, however, for contributions designated for a primary election but made after the date of the primary election. Such contributions may be accepted by a political committee "only to the extent that the contribution does not exceed the net debts outstanding^{8/} from the primary election" 11 C.F.R. § 110.1(a)(2)(i) (1986). By implication, contributions designated for a general election but received after the general election can be accepted by a political committee only to the extent of the Committee's net debts outstanding for the general election. A.O. 1977-24, 1 Fed. Election Camp. Fin. Guide [CCH] ¶ 5873.^{9/} 11 C.F.R. § 110.1(a)(2)(ii) (1986) further provides that contributions not

7. Similarly, for multicandidate committees 11 C.F.R. § 110.2(a)(1) (1986) provides that with respect to any election has the same meaning as 11 C.F.R. § 110.1(a)(2). Additionally, at the time the contributions in question were received by the McConnell 1984 Committee, these former Commission regulations at §§ 110.1 & 2 were in effect. Amended §§ 110.1 & 2 became effective on April 8, 1987.

8. Unlike the Commission's present regulations at 11 C.F.R. § 110.1, former 11 C.F.R. § 110.1 did not define the meaning of the term "net debts outstanding". However, in Advisory Opinion 1984-32, the Commission defined the term "net debts outstanding" as "the difference between the total of the committee's debts and obligations incurred with respect to the primary election and the total of the Committee's cash on hand available to pay those debts and obligations at the time [the] contributions is made."

9. Although not in effect at the time of the activities involved, the current regulations make this explicit. 11 C.F.R. § 110.1(b)(3)(i).

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designated in writing by a contributor for a particular election are attributable to the primary election if made on or before the date of the primary election and are attributable to the general election if made after the date of the primary election.

Pursuant to 11 C.F.R. § 103.3(b)(1) (1986) illegal contributions should be returned to the contributor within 10 days and if deposited a treasurer must make his best efforts to determine legality of the contribution.^{10/} If the legality of the contribution cannot be determined, the contribution must be refunded within a reasonable time.^{11/}

b. Analysis

The threshold question in this matter is the status of the contributions received by the McConnell 1984 Committee prior to the transfer of such funds to the McConnell 1990 Committee. Based on the discussion below, it appears that the McConnell 1984 Committee accepted contributions in violation of the contribution limits of the Act.

Under Commission regulations, contributions designated for a particular election are treated as made for that election. Consequently, contributions received after the 1984 general election and designated for that election could only be accepted by the McConnell 1984 Committee to the extent that the contributions did not exceed the Committee's general election net

10. 11 C.F.R. § 103.3 was also amended in 1987.

11. Former Commission regulations did not define the term "reasonable time". Refunds of contributions within 30 days after the receipt of the contribution was deemed refundable within a reasonable time. A.O. 1985-25.

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debts outstanding. A.O. 1984-32. Undesignated contributions, on the other hand, would be attributable to the next election in which the individual is a candidate. A.O. 1977-24.

The RAD analysis of the McConnell 1984 Committee's net debts outstanding appears to have been accurately calculated. (Attachment 1, page 11). Based on the RAD analysis, the McConnell 1984 Committee had accepted \$90,655 in excess of the Committee's net debts and winding down costs. Contrary to the assertions of the McConnell 1990 Committee, it appears that RAD took into account refunds, rebates and interest in determining the 1984 Committee's net debts outstanding.^{12/} (Attachment 1, pages 2-3 and page 11). Since the McConnell 1984 Committee could not lawfully accept the \$90,655 in contributions, the total amount of these contributions should have been refunded or redesignated to the next election within a reasonable time. A.Os 1984-32, 1980-30, 1977-24. Furthermore, it is clear from the reports that the McConnell 1984 Committee did not seek refunds or redesignations of these 1984-85 contributions at that time. In fact refunds or redesignations by the McConnell 1990 Committee did not occur until 1990.

Accordingly, since the redesignation or refund of these 1985 post-general election contributions that had exceeded the McConnell 1984 Committee's net debts did not occur within a reasonable time, the McConnell 1990 Committee has accepted

12. Indeed, it may be argued that the RAD analysis was generous in giving the Committee the benefit of winding down costs when in fact McConnell became a candidate in December 1984 prior to the receipt of the contributions in question.

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\$90,655^{13/} in excessive contributions in violation of 2 U.S.C. § 441a(f).^{14/}

Having already accepted \$90,655 in excessive contributions in 1985, it appears that the initial 2 U.S.C. § 441a(f) violation was compounded when the 1984 McConnell Committee transferred \$81,309 of that \$90,655 to the 1990 McConnell Committee, because aggregation of the contributions making up the transfer with later contributions to that committee resulted in the acceptance of additional excessive contributions by the McConnell 1990 Committee in 1989.^{15/}

Pursuant to 11 C.F.R. § 110.3 (1986), a candidate's previous campaign committee can make unlimited transfers of funds to a candidate's current campaign so long as none of the funds transferred contain contributions in violation of the Act. As noted, these contributions were not lawfully received by the McConnell 1984 Committee because these contributions exceeded the 1984 Committee's net debts outstanding. Moreover, as contributions designated for the 1984 general election, these contributions should not have been used in the upcoming election without redesignation of the contributions.

13. The \$90,655 amount includes both the contributions comprising the transfer (\$81,309) as well as \$9,346 in contributions to the Kentucky Republican Party.

14. The McConnell 1990 Committee is liable for the violation as the successor committee to the McConnell 1984 Committee.

15. The transfer of funds to the McConnell 1990 Committee occurred prior to the Commission's amendment to the regulations regarding transfers (1989).

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Moreover, Mitch McConnell was a candidate for the upcoming 1990 election at the time the contributions were received. Since the 1984 election had already taken place, these contributions were clearly used for the purpose of influencing the 1990 election. Therefore, these contributions must be aggregated with later contributions made by the same contributors. AOs 1987-12, 1982-52, 1982-34, 1978-37; and 1977-24. When the post-general election (transfer) contributions are aggregated with later contributions by the same contributors, the McConnell 1990 Committee accepted \$24,750 in Category B type excessive contributions in violation of the contribution limits of the Act during 1989. See Chart B, infra.

Based on the foregoing analyses, the total amount (Category A and B) of excessive contributions accepted by the McConnell 1990 Committee during 1989 is \$26,875. To date the McConnell 1990 Committee has refunded or redesignated \$24,750 of these excessive contributions. See Chart A-2 (category A type excessives) and Chart B-2 (category B type excessives) below.

CHART A-2

CONTRIBUTOR	AMOUNT IN EXCESS	AMOUNT REDESIGNATED	AMOUNT REFUNDED
Jack E. Ruth	\$1,000.00		
Associated General Contractors of America	\$500.00		
Ice Cream and Milk PAC	\$125.00		
PAC of Dun & Bradstreet	\$500.00		
American and Kentucky Medical PACs	N/A		

TOTAL -0-

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CHART B-2

CONTRIBUTOR	AMOUNT IN EXCESS	AMOUNT REDESIGNATED	AMOUNT REFUNDED
Joseph McCoy	\$250.00	G \$250.00	
A T & T PAC	\$500.00	G \$500.00	
American Dental PAC	\$1,000.00	G \$5,000.00 ^{16/}	
Ashland Oil (PACE)	\$2,000.00		\$2,000.00
Build PAC of the Nat. Asso. of Homebuilders	\$5,000.00	G \$5,000.00	
Dairymen, Inc. PAC	\$1,000.00		\$1,000.00
Dealers Election Action Comm.	\$500.00	G \$500.00	
Mobil Oil Corp. PAC	\$2,500.00		\$2,500.00
National Federation of Independent Businesses PAC	\$1,000.00		\$1,000.00
National PAC	\$5,000.00		\$5,000.00
RJR Good Government Fund	\$1,000.00		\$1,000.00
American and Kentucky Medical PACs			
1. American Medical PAC	\$1,000.00		\$3,200.00
2. Kentucky Medical PAC	\$4,000.00		\$1,800.00
TOTALS:	\$24,750.00	\$11,250.00 ^{17/}	\$17,500.00

16. In an amendment to the 1990 Mid-Year Report, the McConnell 1990 Committee indicated that American Dental PAC would be redesignating a \$5,000 contribution to \$4,000 for 1990 primary and 1,000 to 1990 general election. (Attachment 1, page 63). In memo entries to its 1990 April Quarterly Report, however, the McConnell Committee 1990 records the \$5,000 as being redesignated to the 1990 general election. In any event, either redesignation would bring the contribution within the limits of the Act.

17. While the total \$5,000 contribution was redesignated by the contributor, only \$1,000 of the \$5,000 contribution was in excess of the limits of the Act. Therefore, redesignation of the excessive amounts actually totals \$7,250.

The acceptance of these excessive contributions occurred during 1989. The McConnell 1990 Committee accepted the last excessive contribution in November 1989. The earliest redesignation or refund occurred on February 2, 1990. (Attachment 1, pages 63-72). It appears, therefore, that the redesignation or refund of \$24,750 was not received by the McConnell Committee within the 60 day time frame of Commission regulations at 11 C.F.R. § 110.1 and .2.

The McConnell 1990 Committee contends that the Committee has sixty days from time when the Committee becomes aware of the violation or subsequently becomes aware that the Commission's assertion is correct in order to cure the violation. Commission regulations at 11 C.F.R. §§ 110.1 and .2 expressly state that corrective action in the form of refund or redesignation must occur within sixty days of a treasurer's receipt of a contribution that when aggregated other contributions by the same contributor exceeds the contribution limits. Furthermore, 11 C.F.R. § 103.3 explains that the treasurer is responsible for examining and aggregating all contributions from the same contributor to determine whether they have exceeded the contribution limits of the Act.

Based on the foregoing, there is reason to believe the McConnell 1990 Committee and Larry J. Steinberg, as treasurer,

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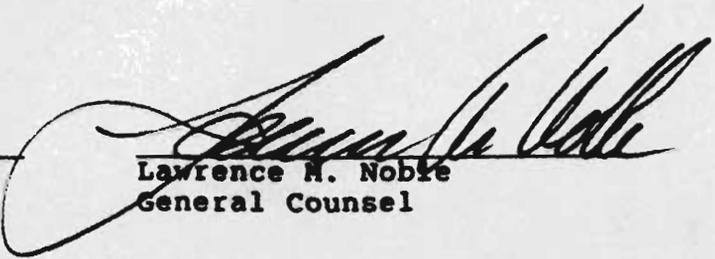
violated 2 U.S.C. § 441a(f).^{18/}

III. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe McConnell Senate Committee '90 and Larry J. Steinberg, as treasurer violated 2 U.S.C. § 441a(f).
3. Approve the attached factual and legal analysis and appropriate letter.

Date

4/19/91



Lawrence M. Noble
General Counsel

Attachments

1. Referral Materials
2. Factual and Legal Analysis

18. Additionally, this matter raises the issue of the McConnell 1984 McConnell 1990 Committees' failure to include on the public record an itemized schedule of the contributions making up the transfer as a memo entry. Our understanding from RAD is that committees sometimes submit such schedules to support transfers from predecessor committees. Itemization (as memo entries) of the contributions making up the bulk transfer would help assure that the relevant contribution limits are followed and thus would prove beneficial to the Commission and to the committees in facilitating observation of contribution limits of the Act.

The Commission regulations and advisory opinions on this issue, however, only require reporting of the identity of the transferor and the gross amount being received by the authorized committee. See 11 C.F.R. § 104.3(a)(4)(iii)(A) and AO 1987-4. The Office of the General Counsel notes that the regulations' and the advisory opinions' limited itemization requirement are premised on receipt of transfers containing lawfully received contributions. This is simply not the case in the instant matter, where contributions designated for the 1984 general election were received after that election and in excess of the Committee's net debts outstanding, and were transferred to the 1990 Committee with no redesignations by the contributors. Nonetheless, in view of the current regulations and advisory opinions, this Office makes no recommendation against the McConnell Committee with respect to this issue.

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BEFORE THE FEDERAL ELECTION COMMISSION

(MUR)
3271

In the Matter of)	
)	
McConnell Senate Committee '90)	RAD Referral #90L-20
and Larry J. Steinberg, as)	
treasurer.)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 25, 1991, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral #90L-20:

1. Open a MUR.
2. Find reason to believe McConnell Senate Committee '90 and Larry J. Steinberg, as treasurer violated 2 U.S.C. § 441a(f).
3. Approve the factual and legal analysis and appropriate letter, as recommended in the General Counsel's Report dated April 19, 1991.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

4-26-91
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat:	Tues., April 23, 1991 10:11 a.m.
Circulated to the Commission:	Tues., April 23, 1991 4:00 p.m.
Deadline for vote:	Tues., April 25, 1991 4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 13, 1991

Larry J. Steinberg, Treasurer
McConnell Senate Committee '90
P.O. Box 1496
Louisville, KY 40201

RE: MUR 3271
McConnell Senate Committee '90
and Larry J. Steinberg,
as treasurer

Dear Mr. Steinberg:

On April 25, 1991, the Federal Election Commission found that there is reason to believe McConnell Senate Committee '90 ("Committee") and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may

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Larry J. Steinberg, Treasurer
Page Two

complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Deborah Curry, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


John Warren McGarry
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

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FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

In the Matter of:)
)
McConnell Senate Committee '90)
and Larry J. Steinberg,) MUR 3271
as treasurer)

A. Facts

In the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has reviewed reports on file at the Commission indicating that the McConnell 1990 Committee accepted \$26,875 in apparent excessive contributions in 1989.^{1/} These contributions were made by two (2) individuals and 15 qualified multicandidate committees. The apparent excessive contributions fall into two categories.

1. CATEGORY A TYPE EXCESSIVES

Category A type excessives involve contributions accepted directly by the McConnell 1990 Committee from one (1) individual and five (5) qualified multicandidate political committees. On reports filed at the Commission, the McConnell 1990 Committee designated these contributions as attributable to the 1990 primary. When aggregated, the contributions received by the

1. The McConnell 1990 Committee was not notified of an apparent excessive contribution of \$125 from Ice Cream and Milk PAC until March 7, 1990. Additionally, the McConnell 1990 Committee was not notified of an additional \$3,800 in apparent excessive contributions (Jack Ruth, American & Kentucky Medical PAC and RJR Good Government Fund.) These entities are noted on Chart A and B with an asterisk (*).

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McConnell 1990 Committee from the contributors listed below exceeded the contribution limits of the Act.

CHART A

CONTRIBUTOR	AMOUNT	RECEIPT DATE	COMMITTEE'S DESIGNATION	AMOUNT IN EXCESS
Jack E. Ruth	\$1,000.00	22-MAY-1987	PRIMARY 90	
	\$1,000.00	08-JUN-1989	*PRIMARY 90	\$1,000.00
	\$1,000.00	08-JUN-1989	GENERAL 90	
Associated General Contractors of America	\$500.00	19-FEB-1985	PRIMARY 90	
	\$5,000.00	21-APR-1989	PRIMARY 90	\$500.00
Ice Cream and Milk PAC	\$500.00	04-MAR-1985	PRIMARY 90	
	\$2,000.00	26-MAY-1989	PRIMARY 90	
	\$625.00	30-JUN-1989	PRIMARY 90	
	\$2,000.00	08-NOV-1989	PRIMARY 90	\$125.00
PAC of Dun & Bradstreet	\$500.00	30-JAN-1985	PRIMARY 90	
	\$1,000.00	28-APR-1989	PRIMARY 90	
	\$4,000.00	12-JUN-1989	PRIMARY 90	\$500.00
	\$625.00	30-JUN-1989	GENERAL 90	
American and Kentucky Medical PACs ²	N/A	N/A	N/A	
			TOTAL	\$2,125.00

2. CATEGORY B TYPE EXCESSIVES

Category B type excessives involve the acceptance of contributions in excess of the McConnell 1984 Committee's net debts outstanding and as a result of \$81,309 in transfers from the

2. American Medical PAC and Kentucky Medical PAC are affiliated committees and share a single contribution limit under the Act. The American and Kentucky Medical PACs exceeded the limits on the basis of contributions made to the McConnell 1990 Committee. Additionally, American Medical PAC and Kentucky Medical PAC made contributions that involve Category B type excessives. For purposes of analysis, in this report American Medical PACs and Kentucky Medical PAC's contributions, excessives and refunds are considered in Chart B.

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McConnell 1984 Committee to the McConnell 1990 Committee. According to Commission reports, \$81,309 was transferred from the McConnell 1984 Committee to the McConnell 1990 Committee on August 14, 1985 (\$80,186) and September 18, 1985 (\$1,123). The source of the transfer were contributions received by the McConnell 1984 Committee after the date of the 1984 general election. These contributions were designated on the reports of the McConnell 1984 Committee for the 1984 general election. The \$81,309 transferred appears to be in excess of the McConnell 1984 Committee's net debts outstanding.

Commission reports indicate that as of November 26, 1984, the McConnell 1984 Committee disclosed cash-on-hand of \$24,770 and \$40,084 in outstanding debts and obligations. From November 27, 1984, until termination of the 1984 McConnell Committee in 1986, the McConnell 1984 Committee raised \$192,627 in contributions, received \$11,614 in refunds, rebates and other receipts and made \$138,356 in expenditures to wind down the 1984 campaign and retire outstanding debts and obligations. The Reports Analysis Division ("RAD") calculates that the McConnell 1984 Committee had received \$90,655 in excess of necessary debt retirement and winding down costs. Because the McConnell 1990 Committee failed to provide a memorandum schedule for the transfer, RAD used the last in first out method ("lifo") to determine the composition of the transferred funds.

Review of the McConnell 1990 Committee's 1989 Mid-Year report revealed that when the contributions made by contributors that were the source of the transfer were aggregated with subsequent

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contributions of these contributors, the McConnell 1990 Committee had accepted excessive contributions. As a result of the aggregation of contributions received by the McConnell 1990 Committee from the contributors listed below who also made post-election contributions to the McConnell 1984 Committee, the McConnell 1990 Committee accepted apparent excessives totaling \$21,550 from one (1) individual and twelve (12) qualified multicandidate political committees.

CHART B

CONTRIBUTOR	AMOUNT	RECEIPT DATE	COMMITTEE'S DESIGNATION	AMOUNT IN EXCESS
Joseph McCoy	\$250.00	25-JAN-1985	GENERAL 84	
	\$1,000.00	15-MAY-1989	PRIMARY 90	\$250.00
T & T PAC	\$500.00	16-APR-1985	GENERAL 84	
	\$2,500.00	19-DEC-1988	PRIMARY 90	
	\$1,750.00	29-JUN-1989	PRIMARY 90	
	\$750.00	30-JUN-1989	PRIMARY 90	\$500.00
American Dental PAC	\$5,000.00	25-JAN-1985	GENERAL 84	
	\$1,000.00	26-MAY-1989	PRIMARY 90	\$1,000.00
Ashland Oil (PACE)	\$2,000.00	30-JAN-1985	GENERAL 84	
	\$5,000.00	10-MAR-1989	PRIMARY 90	\$2,000.00
	\$5,000.00	15-MAY-1989	GENERAL 90	
Build PAC of the Nat. Asso. of Homebuilders	\$5,000.00	30-JAN-1985	GENERAL 84	
	\$5,000.00	29-JUN-1989	PRIMARY 90	\$5,000.00

Dairymen, Inc. PAC	\$1,000.00	04-MAR-1985	GENERAL 84	
	\$2,000.00	11-OCT-1988	PRIMARY 90	
	\$3,000.00	26-MAY-1989	PRIMARY 90	\$1,000.00
	\$4,000.00	26-MAY-1989	GENERAL 90	
	\$800.00	13-OCT-1989	GENERAL 90	
Dealers Election Action Comm.	\$500.00	04-MAR-1985	GENERAL 84	
	\$2,000.00	20-FEB-1986	PRIMARY 90	
	\$2,000.00	15-MAY-1989	PRIMARY 90	
	\$500.00	12-JUN-1989	PRIMARY 90	
	\$500.00	30-JUN-1989	PRIMARY 90	\$500.00
Mobil Oil Corp. PAC	\$2,500.00	16-APR-1985	GENERAL 84	
	\$5,000.00	30-JUN-1989	PRIMARY 90	\$2,500.00
National Federation of Independent Businesses PAC	\$1,000.00	12-MAR-1985	GENERAL 84	
	\$2,000.00	29-JUN-1989	PRIMARY 90	
	\$3,000.00	30-JUN-1989	PRIMARY 90	\$1,000.00
National PAC	\$5,000.00	06-MAY-1985	GENERAL 84	
	\$5,000.00	12-JUN-1989	PRIMARY 90	\$5,000.00
NJR Good Government Fund	\$1,000.00	25-JAN-1985	GENERAL 84	
	\$5,000.00	10-MAR-1989	*PRIMARY 90	\$1,000.00
	\$5,000.00	10-MAR-1989	GENERAL 90	
American and Kentucky Medical PACs				
1. American Medical PAC	\$3,200.00	30-JAN-1985	PRIMARY 90	
	\$1,000.00	15-MAY-1989	PRIMARY 90	\$1,000.00
2. Kentucky Medical PAC	\$1,800.00	30-JAN-1985	GENERAL 84	
	\$4,000.00	15-MAY-1989	*PRIMARY 90	\$4,000.00
			TOTALS	\$24,750.00

3. RAD COMMUNICATIONS

On December 5, 1989, a Request for Additional Information ("RFAI") noted the apparent excessive contributions as a result of both Category A type and Category B type excessives. With respect to the transfer (\$81,309) from the McConnell 1984 Committee to the McConnell 1990 Committee, the RFAI indicated that the transfer had included funds received by the 1984 Committee after the date of the 1984 general election. The RFAI noted that such funds could only be accepted to the extent that the McConnell 1984 Committee had debts remaining from the 1984 general election. The RFAI explained that a life analysis was used to determine that the McConnell 1984 Committee's receipt of contributions exceeded its net debt and winding down costs by \$90,654.

The RFAI indicated that since the contributions appeared to be in excess of the Committee's net debt, these contributions should have been refunded or redesignated for the 1990 election. The RFAI noted further that since these funds were transferred from the McConnell 1984 Committee to the McConnell 1990 Committee the contributions should be considered made for the 1990 primary election and aggregated with subsequent contributions by the same contributors to the McConnell 1990 Committee. Finally, the RFAI requested the refund or redesignation of any contributions found to be in excess of the contribution limits of the Act.

Though the McConnell 1990 Committee contacted the RAD analyst by phone to discuss the matter in December 1989 and February 1990, the McConnell 1990 Committee did not submit a

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written response to these issues until February 7, 1990. While the response indicated that the apparent excessive contributions had either been refunded, redesignated or would be redesignated, the Committee did not provide dates for these transactions. The McConnell 1990 Committee's 1990 April Quarterly report contained memo entries for \$12,250 in refunds or redesignations of excessive contributions. On April 23, 1990, the McConnell 1990 Committee listed refunds or redesignations to be disclosed in its 1990 12 Day Pre-primary report. This list disclosed that an additional \$9,300 had been refunded. To date a total of \$24,750^{3/} out of \$26,875 in excessive contributions has been redesignated or refunded by the McConnell 1990 Committee. Consequently, the McConnell Committee has an outstanding balance of \$2,125 in apparent excessive contributions to be redesignated or refunded.

Telephone conversations and written correspondence to the Commission from the McConnell 1990 Committee suggest substantial agreement with RAD's analysis of the matter. The McConnell 1990 Committee disagrees strongly, however, with respect to two issues regarding these transactions. First, the McConnell 1990 Committee has disputed on several occasions the amount of apparent excessive contributions based on the McConnell 1990 Committee's aggregation of contributions by contributors that made 1984 post-general election contributions and 1990 contributions. In this regard, the McConnell 1990 Committee

3. The McConnell 1990 Committee made an additional refund of \$3,200 to American Medical PAC on October 17, 1990.

contends that the aggregate amount of contributions to be refunded or redesignated should be \$69,700.^{4/} According to the McConnell 1990 Committee, this amount represents the total transfer (\$81,311.18) less interest and refunds of \$11,611.18.^{5/} A RAD analyst explained to the McConnell 1990 Committee that interest and refunds had in fact been taken into account in determining the amount in excess of the Committee's net debt.

Additionally, the McConnell 1990 Committee disagrees with the Commission's interpretation of the time frame for refunds and redesignations. A RAD Analyst informed the Committee of the sixty day time limit on redesignations or refunds. Initially, the McConnell Committee contended that the sixty days ran from when they became aware of the violation. Subsequently, the McConnell 1990 Committee expanded on this contention, indicating that the sixty day period should run from the date the Committee determines that the Commission's assertion is correct.

B. CATEGORY A TYPE EXCESSIVES

1. Law

Pursuant to 2 U.S.C. § 441a(a)(1)(A), it is unlawful for any person to make contributions to any candidate and his authorized

4. The McConnell 1990 Committee's response notes that ultimately \$75,960 of the \$81,309 transferred from the 1984 Committee was treated as subject to redesignation or refund. According to the McConnell 1990 Committee, the higher figures occurred due to an overzealous staff worker who traced the transfer further back than instructed. Since corrective action had occurred, the McConnell 1990 Committee did not seek to undo these transactions.

5. There is a slight discrepancy between these figures and the figures derived from reports on file at the Commission (transfer of \$81,309 and interest and refunds of \$11,614).

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committee with respect to any election for federal office which, in the aggregate, exceed \$1,000. Additionally, it is unlawful for multicandidate political committees to make contributions to any candidate and his authorized committee with respect to any election for federal office which, in the aggregate, exceed \$5,000. 2 U.S.C. § 441a(a)(2)(A). 2 U.S.C. § 441a(f) prohibits a candidate or committee from knowingly accepting contributions in violation of the contribution limitations of the Act.

2. Analysis

The reports on file at the Commission indicate that the McConnell Committee may have accepted excessive contributions. As noted in Chart A, these contributions were made directly to the McConnell 1990 Committee and the contributions were designated for the 1990 primary. As can be seen from Chart A, these contributions aggregated in excess of the 1990 primary limit for individuals or multicandidates committees during 1989. The excessive contributions accepted by McConnell 1990 Committee as a result of Category A type excessive contributions totaled \$2,125.

C. CATEGORY B TYPE EXCESSIVES

1. Law

The Act's contribution limitations apply separately with respect to each election in which an individual is a candidate regardless of when the contribution is made. 2 U.S.C. §§ 441a(a)(1)(A), 441a(a)(2)(A) and 441a(a)(6). The term "contribution" is defined as "any gift, subscription, loan, advance, or deposit of money or anything of value made by any

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person for the purpose of influencing any election for federal office. . . ." 2 U.S.C. § 431(8)(A)(i).

11 C.F.R. 110.1(a)(2)(i) (1986) provided that "with respect to any election" means that contributions designated in writing by the contributor for a particular election are attributable to the limit set for that election.^{6/} An exception exists, however, for contributions designated for a primary election but made after the date of the primary election. Such contributions may be accepted by a political committee "only to the extent that the contribution does not exceed the net debts outstanding^{7/} from the primary election" 11 C.F.R. 110.1(a)(2)(i) (1986). By implication, contributions designated for a general election but received after the general election can be accepted by a political committee only to the extent of the Committee's net debts outstanding for the general election. A.O. 1977-24, 1 Fed. Election Camp. Fin. Guide [CCH] ¶ 5873.^{8/} 11 C.F.R.

6. Similarly, for multicandidate committees 11 C.F.R. § 110.2(a)(1) (1986) provides that with respect to any election has the same meaning as 11 C.F.R. § 110.1(a)(2). Additionally, at the time the contributions in question were received by the McConnell 1984 Committee, these former Commission regulations at §§ 110.1 & 2 were in effect. Amended §§ 110.1 & 2 became effective on April 8, 1987.

7. Unlike the Commission's present regulations at 11 C.F.R. § 110.1, former 11 C.F.R. § 110.1 did not define the meaning of the term "net debts outstanding". However, in Advisory Opinion 1984-32, the Commission defined the term "net debts outstanding" as "the difference between the total of the committee's debts and obligations incurred with respect to the primary election and the total of the Committee's cash on hand available to pay those debts and obligations at the time [the] contributions is made."

8. Although not in effect at the time of the activities involved, the current regulations make this explicit. 11 C.F.R. § 110.1(b)(3)(i).

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§ 110.1(a)(2)(ii) (1986) further provides that contributions not designated in writing by a contributor for a particular election are attributable to the primary election if made on or before the date of the primary election and are attributable to the general election if made after the date of the primary election.

Pursuant to 11 C.F.R. § 103.3(b)(1) (1986) illegal contributions should be returned to the contributor within 10 days and if deposited a treasurer must make his best efforts to determine legality of the contribution.^{9/} If the legality of the contribution cannot be determined, the contribution must be refunded within a reasonable time.^{10/}

b. Analysis

The threshold question in this matter is the status of the contributions received by the McConnell 1984 Committee prior to the transfer of such funds to the McConnell 1990 Committee. Based on the discussion below, it appears that the McConnell 1984 Committee accepted contributions in violation of the contribution limits of the Act.

Under Commission regulations, contributions designated for a particular election are treated as made for that election. Consequently, contributions received after the 1984 general election and designated for that election could only be accepted by the McConnell 1984 Committee to the extent that the

9. 11 C.F.R. § 103.3 was also amended in 1987.

10. Former Commission regulations did not define the term "reasonable time". Refunds of contributions within 30 days after the receipt of the contribution was deemed refundable within a reasonable time. A.O. 1985-25.

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contributions did not exceed the Committee's general election net debts outstanding. A.O. 1984-32. Undesignated contributions, on the other hand, would be attributable to the next election in which the individual is a candidate. A.O. 1977-24.

The RAD analysis of the McConnell 1984 Committee's net debts outstanding appears to have been accurately calculated. Based on the RAD analysis, the McConnell 1984 Committee had accepted \$90,655 in excess of the Committee's net debts and winding down costs. Contrary to the assertions of the McConnell 1990 Committee, it appears that RAD took into account refunds, rebates and interest in determining the 1984 Committee's net debts outstanding.^{11/} Since the McConnell 1984 Committee could not lawfully accept the \$90,655 in contributions, the total amount of these contributions should have been refunded or redesignated to the next election within a reasonable time. A.O.s 1984-32, 1980-30, 1977-24. Furthermore, it is clear from the reports that the McConnell 1984 Committee did not seek refunds or redesignations of these 1984-85 contributions at that time. In fact refunds or redesignations by the McConnell 1990 Committee did not occur until 1990.

Accordingly, since the redesignation or refund of these 1985 post-general election contributions that had exceeded the McConnell 1984 Committee's net debts did not occur within a reasonable time, the McConnell 1990 Committee has accepted

11. Indeed, it may be argued that the RAD analysis was generous in giving the Committee the benefit of winding down costs when in fact McConnell became a candidate in December 1984 prior to the receipt of the contributions in question.

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\$90,655^{12/} in excessive contributions in violation of 2 U.S.C. § 441a(f).^{13/}

Having already accepted \$90,655 in excessive contributions in 1985, it appears that the initial 2 U.S.C. § 441a(f) violation was compounded when the 1984 McConnell Committee transferred \$81,309 of that \$90,655 to the 1990 McConnell Committee, because aggregation of the contributions making up the transfer with later contributions to that committee resulted in the acceptance of additional excessive contributions by the McConnell 1990 Committee in 1989.^{14/}

Pursuant to 11 C.F.R. § 110.3 (1986), a candidate's previous campaign committee can make unlimited transfers of funds to a candidate's current campaign so long as none of the funds transferred contain contributions in violation of the Act. As noted, these contributions were not lawfully received by the McConnell 1984 Committee because these contributions exceeded the 1984 Committee's net debts outstanding. Moreover, as contributions designated for the 1984 general election, these contributions should not have been used in the upcoming election without redesignation of the contributions.

Moreover, Mitch McConnell was a candidate for the upcoming

12. The \$90,655 amount includes both the contributions comprising the transfer (\$81,309) as well as \$9,346 in contributions to the Kentucky Republican Party.

13. The McConnell 1990 Committee is liable for the violation as the successor committee to the McConnell 1984 Committee.

14. The transfer of funds to the McConnell 1990 Committee occurred prior to the Commission's amendment to the regulations regarding transfers (1989).

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1990 election at the time the contributions were received. Since the 1984 election had already taken place, these contributions were clearly used for the purpose of influencing the 1990 election. Therefore, these contributions must be aggregated with later contributions made by the same contributors. AOs 1987-12, 1982-52, 1982-34, 1978-37; and 1977-24. When the post-general election (transfer) contributions are aggregated with later contributions by the same contributors, the McConnell 1990 Committee accepted \$24,750 in Category B type excessive contributions in violation of the contribution limits of the Act during 1989. See Chart B, supra.

Based on the foregoing analyses, the total amount (Category A and B) of excessive contributions accepted by the McConnell 1990 Committee during 1989 is \$26,875. To date the McConnell 1990 Committee has refunded or redesignated \$24,750 of these excessive contributions. See Chart A-2 (category A type excessives) and Chart B-2 (category B type excessives) below.

CHART A-2

CONTRIBUTOR	AMOUNT IN EXCESS	AMOUNT REDESIGNATED	AMOUNT REFUNDED
Jack E. Ruth	\$1,000.00		
Associated General Contractors of America	\$500.00		
Ice Cream and Milk PAC	\$125.00		
PAC of Dun & Bradstreet	\$500.00		
American and Kentucky Medical PACs	N/A		

TOTAL -0-

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CHART B-2

CONTRIBUTOR	AMOUNT IN EXCESS	AMOUNT REDESIGNATED	AMOUNT REFUNDED
Joseph McCoy	\$250.00	G \$250.00	
A T & T PAC	\$500.00	G \$500.00	
American Dental PAC	\$1,000.00	G \$5,000.00 ^{15/}	
Ashland Oil (PACE)	\$2,000.00		\$2,000.00
Build PAC of the Nat. Asso. of Homebuilders	\$5,000.00	G \$5,000.00	
Dairymen, Inc. PAC	\$1,000.00		\$1,000.00
Dealers Election Action Comm.	\$500.00	G \$500.00	
Mobil Oil Corp. PAC	\$2,500.00		\$2,500.00
National Federation of Independent Businesses PAC	\$1,000.00		\$1,000.00
National PAC	\$5,000.00		\$5,000.00
RJR Good Government Fund	\$1,000.00		\$1,000.00
American and Kentucky Medical PACs			
1. American Medical PAC	\$1,000.00		\$3,200.00
2. Kentucky Medical PAC	\$4,000.00		\$1,800.00
TOTALS:	\$24,750.00	\$11,250.00 ^{16/}	\$17,500.00

15. In an amendment to the 1990 Mid-Year Report, the McConnell 1990 Committee indicated that American Dental PAC would be redesignating a \$5,000 contribution to \$4,000 for 1990 primary and 1,000 to 1990 general election. In memo entries to its 1990 April Quarterly Report, however, the McConnell Committee 1990 records the \$5,000 as being redesignated to the 1990 general election. In any event, either redesignation would bring the contribution within the limits of the Act.

16. While the total \$5,000 contribution was redesignated by the contributor, only \$1,000 of the \$5,000 contribution was in excess of the limits of the Act. Therefore, redesignation of the excessive amounts actually totals \$7,250.

The acceptance of these excessive contributions occurred during 1989. The McConnell 1990 Committee accepted the last excessive contribution in November 1989. The earliest redesignation or refund occurred on February 2, 1990. It appears, therefore, that the redesignation or refund of \$24,750 was not received by the McConnell Committee within the 60 day time frame of Commission regulations at 11 C.F.R. § 110.1 and .2.

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The McConnell 1990 Committee contends that the Committee has sixty days from time when the Committee becomes aware of the violation or subsequently becomes aware that the Commission's assertion is correct in order to cure the violation. Commission regulations at 11 C.F.R. §§ 110.1 and .2 expressly state that corrective action in the form of refund or redesignation must occur within sixty days of a treasurer's receipt of a contribution that when aggregated other contributions by the same contributor exceeds the contribution limits. Furthermore, 11 C.F.R. § 103.3 explains that the treasurer is responsible for examining and aggregating all contributions from the same contributor to determine whether they have exceeded the contribution limits of the Act.

Based on the foregoing, there is reason to believe the McConnell 1990 Committee and Larry J. Steinberg, as treasurer, violated 2 U.S.C. § 441a(f).

McConnell Senate Committee

P.O. Box 1496

Louisville, Kentucky 40201

06-1375

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 MAY 31 AM 10:21

May 29, 1991

Deborah Curry
Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: MUR 3271

Dear Ms. Curry:

A request is made for an extension of twenty days to respond to your letter of May 13, 1991, which was received by our committee on May 21, 1991. The original due date of our response would be fifteen days from the date of receipt, or June 5, 1991. The requested extension to respond would be until June 25, 1991.

This extension is requested because I recently (two weeks ago) purchased a new business and, due to the hectic schedule which has been necessary since then, I have not yet had time to properly address the issues which you have set forth in your letter. I have not yet even had time to dig out our files on this matter, which was last addressed over a year ago.

Also, I am enclosing a Statement of Designation of Counsel. If you need to discuss any of these matters, my telephone number is on this Statement.

Very truly yours,

Larry J. Steinberg
Treasurer

cc: Niels C. Holch

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OFFICE OF GENERAL COUNSEL
91 MAY 31 PM 12:08

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 3271

NAME OF COUNSEL: Niels C. Holch

ADDRESS: McGuinness & Holch

400 North Capitol St., NW

Suite 585

TELEPHONE: Washington, DC, 20001

↳ (202) 789-8655

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

5-29-91
Date

Larry J. Steinberg
Signature

RESPONDENT'S NAME: Larry J. Steinberg

ADDRESS: McCConnell Senate Committee

P.O. Box 1496

Louisville, KY 40201

HOME PHONE: (502) 425-1833

BUSINESS PHONE: (502) 587-0201

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 4, 1991

Niels C. Holch, Esquire
McGuinness & Holch
400 North Capitol Street, N.W.
Suite 585
Washington, D.C. 20001

RE: MUR 3271
McConnell Senate Committee
'90 and Larry J. Steinberg,
as treasurer

Dear Mr. Holch:

This is in response to a letter from your clients, Larry Steinberg and McConnell Senate Committee '90, dated May 29, 1991, which we received on May 31, 1991, requesting an extension until June 25, 1991, to respond to the Commission's notification of reason to believe. After considering the circumstances presented in your clients' letter, I have granted the requested extension. Accordingly, the response on behalf of your clients is due by the close of business on June 25, 1991.

If you have any questions, please contact Deborah Curry, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Jonathan Bernstein
Assistant General Counsel

cc: Larry J. Steinberg

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FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION
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McGUINNESS & HOLCH
400 North Capitol Street, N.W.
Suite 585
Washington, D.C. 20001
(202) 783-5300

June 24, 1991

Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

CONFIDENTIAL

Subject: MUR 3271

Dear Mr. Noble:

On behalf of the McConnell Senate Committee '90 (now the McConnell Senate Committee '96) and its treasurer, Larry Steinberg, I want to respond to the allegations raised by the Federal Election Commission in its May 13, 1991 letter to my clients.

The McConnell Senate Committee '90 (hereinafter "McConnell Committee") has had time to examine the allegations raised by the Federal Election Commission (hereinafter "Commission" or "FEC") and the purpose of this letter is to address the factual and legal issues discussed by the Commission in its recent communication with the McConnell Committee.

The McConnell Committee wants to state its interest in pursuing pre-probable cause conciliation under 11 C.F.R. § 111.18(d). Representatives of the McConnell Committee are prepared to meet with the Commission staff at the earliest possible opportunity to discuss an informal settlement of this matter.

What follows are factual and legal materials relevant to the Commission's consideration of this matter. Appropriate documentation has been enclosed to support the factual and legal conclusions reached by the McConnell Committee in this response to the Commission.

I. Factual Statements by the McConnell Committee.

A. Category "A" Contributions.

1. Jack E. Ruth.

The Commission staff allege that one individual, Jack E. Ruth, made three \$1000 contributions to the McConnell Committee, one of which exceeded the contribution limit for a federal primary election. These three contributions, however, were made by two

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Lawrence M. Noble
June 24, 1991
Page Two

different individuals who share the same name and are members of the same family.

The first contribution of \$1000 was received on May 22, 1987, and designated for the 1990 primary election. The contribution was in the form of a check drawn on the account of J.E. Ruth of Grayson, Kentucky. The second and third \$1000 contributions were received on June 8, 1989 from a J.E. Ruth of Georgetown, Kentucky. The McConnell Committee confirmed in a telephone conversation on May 29, 1991 with the first contributor, James E. Ruth II, that these two individuals are father and son. The father, James E. Ruth, now lives in Lexington, Kentucky. His son, James E. Ruth II, now resides in Morehead, Kentucky. The McConnell Committee can provide further documentation of these facts if the Commission deems it necessary.

2. Associated General Contractors of America.

The Commission staff allege that this political action committee contributed an excess of \$500 to the 1990 primary election. The McConnell Committee agrees that this is an excessive contribution. A refund check for \$500 was issued on June 17, 1991 to correct this error.

This excess contribution occurred because of a technical problem in transferring computer records by magnetic tape to the McConnell Committee's new computer system in 1987. The McConnell Committee was not aware of this mistake until it was raised in the Commission's letter of May 13, 1991.

3. Ice Cream and Milk PAC.

The Commission staff allege that this political action committee contributed an excess of \$125 to the 1990 primary election. This contribution amount was redesignated to the 1990 general election on January 7, 1990, according to the internal computer records of the McConnell Committee.

This redesignation was recorded in the McConnell Committee's computer system; however, an administrative error prevented the McConnell Committee from reporting this redesignation on its 1990 April Quarterly Report. The McConnell Committee will correct this redesignation problem by filing an amendment to its 1990 April Quarterly Report.

4. PAC of Dun & Bradstreet.

The Commission staff allege that this political action committee contributed an excess of \$500 to the 1990 primary

92040914270

Lawrence M. Noble
June 24, 1991
Page Three

election. The McConnell Committee agrees that this is an excessive contribution. A refund check for \$500 was issued on June 17, 1991 to correct this error.

A duplicate record for this political action committee was created inadvertently by a new computer operator working for the McConnell Committee. The McConnell Committee was not aware of this duplicate record problem until it received the Commission's letter of May 13, 1991.

5. American and Kentucky Medical PACs.

Contributions to these political action committees are discussed in the next section on Category "B" Contributions.

B. Category "B" Contributions.

1. Joseph McCoy.

The Commission staff alleged an excess contribution of \$250 from this individual in a December 5, 1989 letter to the McConnell Committee. The McConnell Committee informed the Commission in a February 2, 1990 letter that this \$250 contribution would be redesignated in writing to the 1990 general election. Follow-up letters were sent to Mr. McCoy on February 28 and March 26, 1990. Beginning on March 27, the McConnell Committee attempted to reach Mr. McCoy by telephone because of his failure to respond. Mr. McCoy provided written authorization for a redesignation to the 1990 general election on March 31, 1991. The McConnell Committee informed the Commission of this redesignation in its 1990 April Quarterly Report.

2. AT&T PAC.

The Commission staff alleged an excess contribution of \$500 from this political action committee in a December 5, 1989 letter to the McConnell Committee. On January 5, 1990, AT&T PAC sent a letter redesignating this \$500 contribution to the 1990 general election. The McConnell Committee informed the FEC of this redesignation in a February 2, 1990 letter, and the redesignation was recorded in the McConnell Committee's 1990 April Quarterly Report.

3. American Dental PAC.

The Commission staff alleged an excess contribution of \$1000 from this political action committee in a December 5, 1989 letter to the McConnell Committee. On January 10, 1990, American Dental

92040914271

Lawrence M. Noble
June 24, 1991
Page Four

PAC sent a letter redesignating a 1985 contribution for \$5000 to the 1990 general election. The McConnell Committee inadvertently reported this redesignation as a \$4000 contribution to the 1990 primary election and a \$1000 contribution to the 1990 general election in a February 2, 1990 letter to the Commission. The McConnell Committee corrected this mistake in its 1990 April Quarterly Report. However, an amendment to the 1990 Mid-Year Report was required because American Dental PAC requested a redesignation of \$4000 to the 1990 primary election and \$1000 to the 1990 general election.

The Commission concedes in footnote 15 of its Factual and Legal Analysis of May 13, 1991, that either of these two redesignations bring this contribution within the limits of the Federal Election Campaign Act.

4. Ashland Oil PAC.

The Commission staff alleged an excess contribution of \$2000 from this political action committee in a December 5, 1989 letter to the McConnell Committee. A refund check for \$2000 was issued by the McConnell Committee on February 2, 1990. The Commission was informed of this refund in a letter sent by the McConnell Committee on the same day. The refund also was recorded in the 1990 April Quarterly Report.

5. BUILD PAC of the Nat'l Association of Homebuilders.

The Commission staff alleged an excess contribution of \$5000 from this political action committee in a December 5, 1989 letter to the McConnell Committee. On January 3, 1990, the McConnell Committee received a letter redesignating this \$5000 contribution to the 1990 general election. The Commission was informed of this redesignation in a February 2, 1990 letter from the McConnell Committee, and the redesignation was recorded in the 1990 April Quarterly Report.

6. Dairymen, Inc. PAC.

The Commission staff alleged an excess contribution of \$1000 from this political action committee in a December 5, 1989 letter to the McConnell Committee. A refund check for \$1000 was issued on February 28, 1990, and this refund was recorded in the McConnell Committee's 1990 April Quarterly Report.

7. Dealers Election Action Committee.

The Commission staff alleged an excess contribution of \$500

92040914272

Lawrence M. Noble
June 24, 1991
Page Five

from this political action committee in a December 5, 1989 letter to the McConnell Committee. The Commission was informed in a February 2, 1990 letter from the McConnell Committee that this \$500 contribution would be redesignated in writing for the 1990 general election. Follow-up letters were sent on February 28 and March 26, 1990. Beginning on March 27, the Committee attempted to reach this political action committee by telephone because of its failure to respond. On March 31, 1991, the Dealers Election Action Committee redesignated this contribution in writing to the 1990 general election. The Commission was informed of this redesignation in the McConnell Committee's 1990 April Quarterly Report.

8. Mobil Oil Corporation PAC.

The Commission staff alleged an excess contribution of \$2500 from this political action committee in a December 5, 1989 letter to the McConnell Committee. The Commission was informed that this contribution would be redesignated to the 1990 general election in a letter sent by the McConnell Committee on February 2, 1990. Follow-up letters seeking written authorization of this redesignation were sent on February 28 and March 26, 1990. Repeated attempts to reach a representative of this political action committee by telephone were also unsuccessful. On April 3, 1990, the McConnell Committee decided to issue a refund of \$2500. This refund was disclosed to the Commission in an April 20, 1990 letter from the McConnell Committee and was recorded in the 1990 Pre-Primary Report.

9. Nat'l Federation of Independent Business PAC.

The Commission staff alleged an excess contribution of \$1000 from this political action committee in a December 5, 1989 letter to the McConnell Committee. A refund check for \$1000 was issued on February 2, 1990. The Commission was informed of this refund in a letter sent from the McConnell Committee on the same day. This refund also was recorded in the 1990 April Quarterly Report.

10. National PAC.

The Commission staff alleged an excess contribution of \$5000 from this political action committee in a December 5, 1989 letter to the McConnell Committee. The Commission was informed that this \$5000 contribution would be redesignated to the 1990 general election in a letter sent by the McConnell Committee on February 2, 1990. Follow-up letters seeking written authorization of this redesignation were sent on February 28 and March 26, 1990. Repeated attempts to obtain this written redesignation were unsuccessful. On April 3, 1990, the McConnell Committee decided to issue a refund for \$5000. The Commission was informed of this

22040914273

Lawrence M. Noble
June 24, 1991
Page Six

refund in a letter sent by the McConnell Committee on April 20, 1990, and this refund also was recorded in the 1990 Pre-Primary Report.

11. RJR Good Government Fund.

This excess contribution of \$1000 was discovered through a review of all contribution records by the McConnell Committee. This review was prompted by the Commission's letter of December 5, 1989, alleging excess contributions involving a transfer from the 1984 McConnell Senate Committee.

The McConnell Committee issued a refund check of \$1000 on February 28, 1990. The Commission was informed of this refund in the 1990 April Quarterly Report.

12. American and Kentucky Medical PACs.

The Commission staff alleged excess contributions from the Kentucky Medical PAC and the American Medical PAC in a December 5, 1989 letter to the McConnell Committee. On February 2, 1990, the McConnell Committee inadvertently reported to the Commission that it was going to redesignate a \$3200 contribution from the American Medical PAC to the 1990 general election. This should have been a redesignation of the \$1800 contribution by the Kentucky Medical PAC as that was the only contribution from either PAC which was designated to the 1984 election.

Follow-up letters to seek written authorization for a redesignation of the \$1800 from the Kentucky Medical PAC were sent on February 28 and March 26, 1990. Repeated attempts to reach representatives of this political action committee were also unsuccessful. On April 3, 1990, the McConnell Committee decided to issue a refund check for \$1800 to the Kentucky Medical PAC. This refund was disclosed to the Commission in an April 20, 1990 letter from the McConnell Committee. This refund also was recorded in the 1990 Pre-Primary Report.

In October of 1990, the McConnell Committee learned from a representative of the Kentucky Medical PAC that it was affiliated with the American Medical PAC. A refund check for \$3200 was issued to this political action committee on October 17, 1990. This refund also was recorded in the 1990 Pre-General Report.

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II. Legal Analysis By the McConnell Committee.

A. Category "A" Contributions.

The McConnell Senate Committee has taken prompt action to address the issues raised by the Commission in its letter of May 16, 1991.

1. The McConnell Committee did not accept an excessive contribution under 2 U.S.C. § 441a(a)(1)(A) from J.E. Ruth because there are two individuals in Kentucky with the same name, both of whom contributed to the McConnell Committee in permissible amounts.

2. The McConnell Committee agrees with the conclusion of the Commission staff that it unknowingly accepted contributions from the Associated General Contractors of America and the PAC of Dun & Bradstreet. Refunds were made to both political committees on June 17, 1991. This action should bring the McConnell Committee into full compliance with 2 U.S.C. §441a(a)(2)(A) and 2 U.S.C. §441a(f) with respect to these contributions.

3. The McConnell Committee will file an amendment to its 1990 April Quarterly Report to correct its administrative error in not reporting the January 7, 1990 redesignation for the Ice Cream and Milk PAC to bring this contribution into full compliance with the FECA.

B. Category "B" Contributions.

1. The 1985 Transfer.

On August 14 and September 18, 1985, the 1984 McConnell Senate Committee transferred \$81,309 to the 1990 McConnell Committee. This transfer between the principal campaign committees of a candidate seeking election to another federal office is expressly permitted by 2 U.S.C. §441a(a)(5)(C).

At the time of the transfer, the regulations implementing the FECA did not contain an affirmative requirement that contributions accepted after a general election must be aggregated with contributions for the next federal election to the extent any contributions exceed outstanding debts remaining from the first election.

The regulations in effect at the time of the transfer only applied to contributions made after primary elections. See 11 C.F.R. §110.1(a)(2)(i) (1986). This provision permitted contributions after a primary election only to the extent that any contribution does not exceed the "net debts outstanding" from the

92040914275

Lawrence M. Noble
June 24, 1991
Page Eight

primary election. Id.

In Footnote 7 of the FEC's Factual and Legal Analysis, the Commission concedes that the regulations in place at the time of this 1985 transfer did not define the meaning of the term "net debts outstanding".

To bolster its case, the Commission relies on Advisory Opinion 1984-32 to provide a definition of this term. However, this Advisory Opinion only applies to primary election activities and the Commission's own regulations strictly limit the reliance on advisory opinions to transactions or activities which are "indistinguishable in all material aspects from the transaction or activity with respect to which such advisory opinion is rendered". See 11 C.F.R. §112.5(a)(2).

The difference between a primary election and a general election is clearly a "material" difference, and the Commission should not be using unconventional interpretations of the regulations and advisory opinions to challenge a transaction which was entered into by a political committee acting in good faith reliance on the rules which were in effect at the time.

Footnote 8 of the Commission's Factual and Legal Analysis concedes that the regulations which applied to this transaction did not explicitly apply to this type of transfer. In fact, the Commission obviously agreed that the standards were too vague in this area because it amended its regulations in 1987 to extend the primary contribution rules to general elections and promulgate a definition for "net debts outstanding". See 11 C.F.R §§110.1 and 110.2.

The McConnell Committee believes that its 1985 transfer was in full compliance with the regulations in effect at that time. It was not aware of any affirmative requirement to aggregate all contributions contained in the transfer for the purpose of determining contribution limits for the next election.

At the time of the transfer, the McConnell Committee relied in good faith on the Commission's rules and regulations, and is entitled to protection under 2 U.S.C. §438(e).

2. The Calculation of "Excessive" Contributions.

In the opinion of the McConnell Committee, the Commission erred in calculating the amount of alleged excessive contributions which resulted from the 1985 transfer.

The Commission staff included \$11,611.18 of interest and

92040714276

Lawrence M. Noble
June 24, 1991
Page Nine

refunds in its calculations of alleged excessive contributions. 2 U.S.C. §431(8)(A) clearly defines a "contribution" as "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."

Interest and refunds are not "contributions" under the FECA and, therefore, cannot be considered excessive contributions.

3. The 60 Day Resignation Rule.

The McConnell Committee was unaware of any affirmative requirement to aggregate individual contributions contained in the 1985 transfer until it received a December 5, 1989 letter from the Commission staff.

The FEC's December 5 letter suggested the following course of action:

If the contributions you received exceed the limit, you should either refund to the donors the amount in excess of \$1,000 or \$5,000 as appropriate, or have the donors redesignate the contributions in writing for the 1990 election....Although the Commission may take further legal steps, prompt action by you to refund or seek redesignation of the excessive amounts will be taken into consideration.

Despite the view that the 1985 transfer was proper under the rules in place at the time, the McConnell Committee moved quickly to ascertain what steps should be taken to respond to the allegations raised by the Commission staff.

After a thorough review of all relevant records from the 1984 and 1990 McConnell Committees, a decision was made to begin to redesignate or refund all contributions which were transferred from the 1984 McConnell Committee. This process began in January, 1990 and was completed--with one exception--by April 3, 1990.

In its Factual and Legal Analysis, the Commission now takes the position that the McConnell Committee violated a requirement that any redesignation or refund of a contribution must be accomplished within sixty days from the receipt of the contribution. See 11 C.F.R. §§110.1(b)(3)(i) and 110.2(b)(3)(i).

It was completely impossible for the McConnell Committee to comply with this technical requirement. The McConnell Committee was unaware of the Commission's view of how its 1985 transfer should have been handled until December 5, 1989. By the time the Commission's letter arrived, more than sixty days had already

92040914277

Lawrence M. Noble
June 24, 1991
Page Ten

passed since the receipt of every single contribution in Category "B".

Nevertheless, the McConnell Committee took prompt action to redesignate or refund each contribution involved. Many of the contributions were redesignated or refunded within sixty days of the Commission's letter of December 5, 1989. Several contributors, however, failed to respond to repeated attempts to authorize a redesignation or request a refund. Nevertheless, the McConnell Committee used its best efforts to contact these contributors within a reasonable time. On April 3, 1990, the McConnell Committee issued refunds to any contributor who could not be reached or had failed to authorize a redesignation.

The McConnell Committee is entitled to protection under 2 U.S.C. §432(i) because it has demonstrated that best efforts were used to obtain the necessary redesignations and refunds required for compliance with the FECA.

It is unfair for the Commission to use a rigid interpretation of the sixty day requirement for the following reasons:

1. The Commission chose to challenge the treatment of a transaction which occurred more than five years ago;

2. The Commission relied on an unconventional interpretation of previous rules in establishing its legal position;

3. The McConnell Committee acted in good faith reliance on the rules and regulations in existence at the time of the alleged transaction;

4. The Commission staff advised orally and in writing that "prompt action" to seek redesignations or refunds would be satisfactory for compliance purposes;

4. The McConnell Committee did not discover the alleged contribution problem until December 5, 1989, well after sixty days had passed since the receipt of all Category "B" contributions; and

5. The McConnell Committee used its best efforts to obtain prompt redesignations and refunds from contributors involved in this transaction.

The McConnell Committee is prepared to meet with the Commission staff at the earliest opportunity to seek a reasonable settlement of this matter.

To assist the Commission with its investigation of these

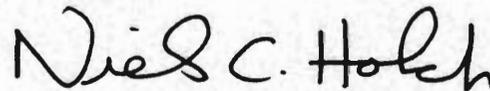
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Lawrence M. Noble
June 24, 1991
Page Eleven

transactions, enclosed are copies of the FEC's December 5, 1989 letter and the February 2 and April 20, 1990 letters to the Commission staff from the McConnell Committee.

Thank you for your consideration of our position on this matter.

Sincerely,



Niels C. Holch

Counsel to the
McConnell Senate Committee

Enclosures

cc: Deborah Curry
Office of the General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

*copy of letter from LCC
advising us of problem
on transfer. did not copy
attachments.
RQ-2*

DEC 5 1989

Mr. Larry J. Steinberg, Treasurer
McConnell Senate Committee '90
P.O. Box 1496
Louisville, KY 40201

COPY

Identification Number: C00193342

Reference: Mid-Year Report (1/1/89-6/30/89)

Dear Mr. Steinberg:

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 (pertinent portion attached) discloses several contributions which appear, to exceed the limits set forth in the Act. No individual or political committee other than a qualified multicandidate committee may make contributions to a candidate for Federal office in excess of \$1,000 per election. Reports on file with the Commission disclose that the Tennessee Walking Horse Breeders and Exhibitors Association PAC did not become a qualified multicandidate until July 31, 1989. Additionally, a qualified multicandidate committee may not make a contribution to a candidate 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. (2 U.S.C. 441(a) and (f); 11 CFR 110.1(b) and (e))

-Reports on file with the Commission disclose a transfer to your committee from the McConnell Senate Committee ("the '84 Committee) in the amount of \$81,309. The transfer includes contributions received by the '84 Committee after the 1984 General Election. These contributions should have been accepted by the '84 Committee only to the extent that they had outstanding debts remaining from the general election. (11 CFR 110.1(b)(3)(i)) Review of the '84 Committee's reports indicate that the contributions exceeded the outstanding net debt amount by \$90,654, this amount \$81,309 was transferred to your committee. The Commission in order to determine which contributions made up this transfer amount has used the last in first out (LIFO) method.

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Please note, all contributions received by the '84 Committee from August 5, 1985 back to January 25, 1985, plus \$15,354 of the contributions received on January 11, 1985 appear to be in excess of its outstanding net debts; therefore, these contributions should have been refunded or redesignated for the 1990 election. Since these funds were transferred to your committee, the contributions should be considered made for the 1990 primary election and aggregated will all subsequent contributions received from these individuals or political committees.

If the contributions in question were incompletely or incorrectly reported, you should amend your original report with the clarifying information. If the contributions you received exceed the limit, you should either refund to the donors the amount in excess of \$1,000 or \$5,000 as appropriate, or have the donors redesignate the contributions in writing for the 1990 election. The Commission should be notified if refunds are necessary. Refunds are reported on Line 20 of the Detailed Summary Page and on Schedule B of the report covering the period in which the refunds 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) and (4))

Although the Commission may take further legal steps, prompt action by you to refund or seek redesignation of the excessive amounts 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 Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 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) 376-2480.

Sincerely,



Pat Sheppard
Senior Reports Analyst
Reports Analysis Division

Attachments

92040914281

McCormack Senate Committee '90
P.O. Box 1496
Louisville, Kentucky 40201

February 2, 1990

COPY

Ms. Pat Sheppard
Senior Reports Analyst
Federal Election Commission
999 E Street, NW
Washington, DC 20463

COPY

Dear Ms. Sheppard:

With regard to your letter of December 5, 1989, please be advised as follows:

Mr. Harry S. Frazier, Jr. - The two contributions of \$1,000 each reflected in the June 30, 1965 report for Mr. Harry S. Frazier, Jr. should have been reported as Mrs. Harry S. Frazier, Jr. Although I thought that we had filed an appropriate amendment to our June 30, 1985 report, all I could find in my files was a copy of a letter dated August 2, 1985 to the Secretary of the Senate, a copy of which is attached. I will look some more for the amendment; if we have not filed one, I will do so.

Mr. Joseph McCoy - The \$250 contribution reported January 25, 1985 will be redesignated in writing as a contribution for the 1990 General election.

AT&T PAC - The \$500 contribution reported April 16, 1985 has been redesignated in writing to the 1990 General election.

American Dental PAC - The \$5,000 contribution reported January 25, 1985 will be redesignated in writing \$4,000 to the 1990 Primary election and \$1,000 to the 1990 General election.

American Medical PAC - The \$3,200 contribution reported January 30, 1985 will be redesignated in writing to the 1990 General election.

Ashland Oil PAC - The \$2,000 contribution reported January 30, 1985 has been refunded.

Associated General Contractors of America PAC - The \$500 contribution received February 19, 1985 will be redesignated in writing to the 1990 General election.

92040914282

Ms. Pat Sheppard
February 2, 1990
Page 2

Build PAC of the National Association of Homebuilders - The \$5,000 contribution reported January 30, 1985 has been redesignated in writing to the 1990 General election.

Dairymen, Inc. PAC - The \$1,000 contribution reported March 4, 1985 will be redesignated in writing to the 1990 General election.

Dealers Election Action Committee of the Nat'l Auto Dealers Association - The \$2,000 contribution reported February 20, 1986 will be redesignated in writing to the 1990 Primary election.

Automobile and Truck Dealers PAC - The \$500 contribution reported March 4, 1985 will be redesignated in writing to the 1990 General election.

Dun & Bradstreet PAC - The \$500 contribution reported January 30, 1985 will be redesignated in writing to the 1990 General election.

Mobil Oil Corporation PAC - The \$2,500 contribution reported April 16, 1985 will be redesignated in writing to the 1990 General election.

National Federation of Independent Businesses PAC - The \$1,000 contribution reported March 12, 1985 has been refunded; the PAC has indicated it will now contribute \$1,000 for the 1990 General election.

The National PAC - The \$5,000 contribution reported May 6, 1985 will be redesignated in writing to the 1990 General election.

We will also obtain written redesignation from the other contributors mentioned in your letter, although we have computed the aggregate amount of contributions to be \$69,700.00, which represents the total transfer of \$81,311.18, less interest and refunds of \$11,611.18. (This amount was computed assuming the funds transferred were comprised of the latest receipts from all sources.) Appropriate notification of our redesignations and refunds will be included in future reports.

Very truly yours,



Larry J. Steinberg
Treasurer

92040914283

McConnell Senate Committee 90

P.O. Box 1496

Louisville, Kentucky 40201

April 20, 1990

**Ms. Pat Sheppard
Senior Reports Analyst
Federal Election Commission
999 E Street, NW
Washington, DC 20463**

COPY

Dear Ms. Sheppard:

Enclosed is a listing of redesignations and refunds which have been made since our April 15 report. The amount of PAC refunds is \$500 less than I indicated in my letter of April 13; that letter is in error due to a mistake in addition. The amount which we refunded or redesignated from the 1984 Committee is \$75,960. If you need additional information, please let me know.

We are experiencing a problem now, in that some PACs to which we made refunds have redesignated after the end of our 60-day period. While I believe we were correct in making refunds within this time frame, some PACs are saying that they have now filed reports indicating a redesignation, and don't know how to handle the refund. Do you have any suggestions? If so, please call me at (502) 584-2337 so we can discuss. Thanks!

Very truly yours,

**Larry J. Steinberg
Treasurer**

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McConnell Senate Committee '90
Refunds and Redesignations
April 1 through April 3, 1990

9
2
0
4
0
9
1
4
2
8
5

<u>Name</u>	<u>Date</u>	<u>Amount</u>
<i>PACs Refunded:</i>		
National Rifle Association	4-3-90	4,950
Steak & Ale Restaurant Corp. PAC	4-3-90	500
McDonald's PAC	4-3-90	1,000
The National PAC	4-3-90	5,000
Mobil Oil Corporation PAC	4-3-90	2,500
Tenneco Employees Good Government Fund	4-3-90	2,500
Peabody Political Action Committee	4-3-90	1,000
National Society of Professional Engineers	4-3-90	2,500
Texas Utilities Company PAC	4-3-90	600
Outdoor Advertising PAC	4-3-90	1,000
Northrop Employees PAC	4-3-90	1,000
Lone Star Steel PAC	4-3-90	500
Coca Cola Co. Nonpartisan Committee for Good Government	4-3-90	250
Litton Employees PAC	4-3-90	2,000
Kentucky Educational Medical PAC	4-3-90	1,800
TxPAC	4-3-90	500
Trane Political Action Committee	4-3-90	500
Associated Builders & Contractors	4-3-90	1,000
Wausau Insurance Co. PAC	4-3-90	250
Effective Political Action Committee	4-3-90	500
Union Pacific Fund for Effective Government	4-3-90	2,000
Boise Cascade Corp PAC	4-3-90	1,000
Union Camp Corp PAC	4-3-90	1,000
Total PACs refunded		<u><u>33,850</u></u>
<i>PACs Redesignated:</i>		
Contel PAC	4-2-90	500
USX Steel PAC (formerly US Steel Good Government Fund)	4-2-90	1,000
Total PACs redesignated		<u><u>1,500</u></u>
<i>Individuals Refunded:</i>		
James F. McCoy	4-3-90	100
Jack A. Robinson	4-3-90	250
Max Gendelman	4-3-90	250
William A. Yolles	4-3-90	250
Leonard H. Lerner	4-3-90	250
Steven I. Victor	4-3-90	250
Norman Katz	4-3-90	250
Leonard McCoy	4-3-90	250
Robert J. Begley	4-3-90	150
Randall H. Leslie	4-3-90	100
Cecil Kimbleton	4-3-90	25
Total individuals refunded		<u><u>2,125</u></u>

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McGUINNESS & HOLCH
LAW OFFICES

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Niels C. Holch

Kevin S. McGuiness

November 6, 1991

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

CONFIDENTIAL

SUBJECT: MUR 3271

Dear Mr. Noble:

On behalf of the McConnell Senate Committee '90 (now the McConnell Senate Committee '96) and its Treasurer, Larry Steinberg, I want to submit additional factual and legal materials which further refute the allegations raised by the Federal Election Commission in its May 13, 1991, letter to my clients.

In the "Factual and Legal Analysis" accompanying this May 13 letter, the Commission staff made the following allegations:

I. That the McConnell Senate Committee accepted \$2,125 in contributions for the 1990 primary which were in excess of federal contribution limits (2 U.S.C. §§ 441a(a)(1)(A) and (a)(2)(A)) for individuals and political action committees (referred to as "Category A Type Excessives");

II. That the McConnell Senate Committee accepted contributions in excess of the 1984 Committee's "net debts outstanding", an alleged violation of 2 U.S.C. § 441a(f) (referred to as "Category B Type Excessives);

III. That the McConnell Senate Committee "compounded" this alleged violation when, after it transferred \$81,309 to the 1990 Committee, it failed to individually aggregate the contributions which made up this transfer; and

IV. That the McConnell Senate Committee, when first informed of the Commission's view of this matter in December, 1989, failed to redesignate or refund the alleged excessive contributions within the sixty day time frame required by 11 C.F.R. § 110.1 and 11 C.F.R. § 110.2 (1990).

A discussion of each allegation follows.

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Mr. Lawrence M. Noble

November 6, 1991

Page 2

I. The McConnell Senate Committee Took Prompt Action With Respect To Category A Type Excessives.

The McConnell Senate Committee took prompt action to respond to the issues raised by the Commission in its May 13, 1991, letter to the Committee. Information was provided to the Commission on one contribution which involved two individuals with the same name; refunds were made within 30 days for two excessive contributions which were inadvertently accepted; and a redesignation which was not reported was promptly corrected through an amendment to a previous filing.

II. The McConnell Senate Committee Acted Properly With Respect To Category B Type Excessives.

The Commission staff allege that the McConnell Senate Committee improperly accepted contributions after the 1984 election in excess of "net debts outstanding".

While this is a correct characterization of federal campaign law in 1991, it was not the state of the law in 1984 and 1985.

A. The 1985 Regulations Did Not Restrict Designated Contributions Received After The General Election.

2 U.S.C. § 441a(a)(1)(A) and 2 U.S.C. § 441a(a)(2)(A) limit contributions to candidates by individuals and political action committees to \$1000 and \$5000 per election, respectively.

Federal Election Commission regulations in effect during 1985 required that these contribution limits and the restrictions contained in Part 110 of the regulations be applied to any "contributions made to retire debts resulting from elections held after December 31, 1974". 11 C.F.R. § 110.1(g)(2) (1985). The obvious purpose of this rule was to ensure that contributions made to retire debts from an election held prior to the date of the contribution may not exceed the allowable contribution limits for that election. 11 C.F.R. § 110.1(g)(2) (1985) and A.O. 1978-37, citing 2 U.S.C. § 441a.

The contribution limits for individuals and political action committees apply separately to each election. 2 U.S.C. § 441a(a)(6) and 11 C.F.R. § 110.1(j)(1) (1985). The 1985 regulations defined the term "with respect to any election" as follows:

(2) "With respect to any election" means-- (i) In the case of a contribution designated in writing for a particular election, the election so designated, except that a contribution made after a primary election, caucus or convention, and designated for the primary election, caucus or convention shall be made only to the extent that the contribution does

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Mr. Lawrence M. Noble

November 6, 1991

Page 3

not exceed net debts outstanding from the primary election, caucus or convention. 11 C.F.R. § 110.1(a)(2)(i) (1985).

This regulation established a general rule that if a donor designated a contribution for a particular election, then the contribution would be treated as being made for that election. A.O. 1984-32. In 1985, this regulation provided only one exception to this general rule, relating to contributions made after a primary election. 11 C.F.R. § 110.1(a)(2)(i) (1985). This exception limited post-primary contributions only to those which did not exceed the "net debts outstanding" from the primary election. *Id.* The regulations did not define "net debts outstanding" or provide a method for calculating this figure. A.O. 1984-32.

In 1985, no exception or limitation in Part 110 applied to contributions made after a general election. See Part 110. This omission in the regulations caused the McConnell Senate Committee to have to review relevant FEC Advisory Opinions and a Commission Rulemaking which was ongoing during the same period.

B. The Relevant FEC Advisory Opinions Provided Inadequate Guidance On The Issue Of Designated Contributions Accepted After A General Election.

Several Advisory Opinions in 1977 and 1978 attempted to address the issue of contributions received after a general election. See A.O. 1977-24, A.O. 1978-37, and A.O. 1978-65. These advisory opinions, however, only addressed the issue of whether or not surplus funds may be transferred from a previous campaign committee to a current campaign committee, and not the issue of whether or not specific restrictions would apply to designated contributions accepted after a general election. *Id.*

Further, these Advisory Opinions suggested that post-general election transfers needed to relate to "outstanding debts" from the general election. See A.O. 1977-24 ("to the extent of outstanding debts"); A.O. 1978-37 ("to the extent such debts are outstanding"); and A.O. 1978-65 ("to the extent that there are outstanding debts").

Contrary to the assertions made in the Commission staff's Factual and Legal Analysis of May 13, 1991, these Advisory Opinions did not refer to the concept of "net debts outstanding" in providing guidance to the public about contributions received after a general election. Instead, these Advisory Opinions referred to the term "outstanding debts", without defining whether the term referred to the fact of outstanding debt or to the amount of such debt.

The Commission did not disclose the statutory or regulatory basis for these Advisory Opinions. And, in the latest Advisory Opinion on this subject, A.O. 1978-65, the Commission also offers conflicting advice about how to handle a transfer from a previous campaign committee to a current campaign committee:

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Mr. Lawrence M. Noble
November 6, 1991
Page 4

Except to the extent that there are outstanding debts from a 1978 election, each "contribution" after the date of the general election in 1978 is charged against the contribution limits of the original contributor with respect to a future election. Excess funds retained by a Committee would not have to be separately reported as a transfer or in any other manner if the contributors of those funds were previously disclosed, as required, on reports filed in 1978. A.O. 1978-65.

In this Advisory Opinion, the Commission takes the position that, except for outstanding debts, a campaign committee should treat contributions received after the election using the limitations required for the next election cycle. However, the Commission confuses its position by also noting that all reporting of these contributions need only be reported using the limits of the previous election.

None of these Advisory Opinions adequately addressed the issue of accepting post-general election contributions when outstanding debts remain from that same general election. Since the regulations and relevant Advisory Opinions did not offer sufficient guidance, the McConnell Senate Committee next examined a proposed Rulemaking on this subject which the Commission initiated on April 17, 1985.

C. The 1985 Notice Of Proposed Rulemaking Confirms That The FEC Rules In Effect At That Time Did Not Apply To Designated Contributions Received After The General Election.

On April 17, 1985, the Commission published a Notice of Proposed Rulemaking (NPR) in the Federal Register. See 50 F.R. 15169 (April 17, 1985). In this Rulemaking, the FEC requested comments on a "proposed revision of its regulations governing contributions by persons and multicandidate political committees at 11 CFR 110.1 and 110.2". Id. at 15169. The Notice went on to state the objective of this NPR:

The primary purpose of the proposed amendments to 11 C.F.R. 110.1 and 110.2 is to address several issues raised in the administration of these provisions since they were adopted in 1977. Through this Notice, the Commission is seeking comment on §§ 110.1 and 110.2 using several different approaches to present the issues. The Commission notes that with respect to some issues, specific results are proposed in the attached draft rules, although a variety of approaches are under consideration. The alternatives are set forth below for public comment. Id. at 15169 (emphasis added).

1. In This Rulemaking The Commission Conceded That Its Rules Did Not Apply To Designated Contributions Received After A General Election.

92040914289

Mr. Lawrence M. Noble
November 6, 1991
Page 5

The 1985 NOPR confirmed that 2 U.S.C. §§ 431(1), 441a(a)(1), and 441a(a)(2) require the Commission to: (1) determine for which election a contribution is made; and (2) rely on the contributor's written designation for a particular election. *Id.* at 15170.

However, the Commission explanation noted that the reason for the Rulemaking was to resolve several outstanding issues, including the problem of how to treat post-primary designated contributions which exceed outstanding debts:

Different problems have arisen with regard to designated and undesignated contributions. For example, a contribution may be designated for a primary election, caucus or convention but received after the date of that election. The current regulations provide that such contributions shall be made only to the extent that they do not exceed net debts outstanding from such election. 11 C.F.R. § 110.1(a)(2)(i). However, the present regulation does not indicate what should be done with such designated contributions if the recipient candidate or his committee has no outstanding primary debts. The Commission is considering whether to revise its rules to provide that the candidate or authorized committee must return or obtain a written redesignation of contributions to the extent that they exceed net debts outstanding. See proposed 11 C.F.R. 110.1(b)(1)(i). Under this proposed rule, the redesignation may be for any other election but must result in excessive contributions for that election. *Id.* (emphasis added).

The Commission also admitted that the regulations in effect in 1985 did not apply to designated contributions after a general election:

Under the present rule, only designated contributions made after a primary election are limited by the amount of outstanding debts. The Commission is considering broadening the rule so that it would also apply to designated contributions received after a general election, runoff election, or special election. Thus, proposed § 110.1(b)(2)(i) would provide that contributions for one of these elections, if made after the date of the election, may be made only to the extent that there are either net debts outstanding from such election or may be designated for a different election. This rule also provides that any amounts exceeding net debts outstanding must be returned or redesignated, as discussed above. *Id.* (emphasis added).

This language conclusively demonstrates that the Commission itself was undecided about what restrictions or limitations should apply to designated contributions received after a general election. The Commission finally resolved this issue by promulgating new regulations (amending §§ 110.1 and 110.2) which became effective on April 8, 1987, two years after the transactions which are the subject of this FEC inquiry took place.

92040914290

Mr. Lawrence M. Noble

November 6, 1991

Page 6

2. This Rulemaking Also Confirms That In 1985 The Commission Was Undecided About How To Define The Term "Net Debts Outstanding".

In the 1985 NOPR, the Commission asked for comments on several different methods for calculating "net debts outstanding", confirming that current FEC rules did not provide an adequate definition. 50 F.R. 15170 (April 17, 1987).

In proposing several alternatives, the FEC then noted that a campaign may need more guidance on what date or dates the proposed definition of "net debts outstanding" needs to be applied:

The Commission recognizes the practical difficulties that can arise for campaigns if they are expected to determine the existence of a primary debt as of a particular date, such as the date on which they received the contribution or the date of the election. *Id.*

The Commission was even undecided on the issue of what time frame should be used to determine when and how the outstanding debt should be calculated:

Another issue concerns the appropriate length of time that should be allowed for determining the existence of a debt. Possible time limits included ten or thirty days from either the date of receipt or the date of deposit, or the end of the reporting period. In this context, the Commission notes that often designated contributions received after the primary may have been contributed in connection with a joint fundraiser for several candidates. Hence, it may take some time for the recipients to determine the financial status of their campaigns. *Id.* (emphasis added).

D. The Commission Is Attempting To Apply Its New § 110 Regulations Retroactively to the McConnell Senate Committee.

The discussion above demonstrates that in 1985 the FEC did not have clear rules pertaining to designated contributions received after the general election. The specific problems with the FEC's Legal Analysis of this problem include:

1. The regulations in effect at the time, by the Commission's own admission, only applied to designated contributions received after a primary election;

2. The relevant Advisory Opinions only discussed the issue of transfers between political committees and not the related issue of when it is improper to accept designated contributions after a general election.

92040914291

Mr. Lawrence M. Noble
November 6, 1991
Page 7

3. The relevant Advisory Opinions never referred to the term "net debts outstanding", the phrase relied on by the Commission in its Factual and Legal Analysis of May 13, 1991. Instead, these Advisory Opinions only referred to the term "outstanding debts" without elaborating on whether the phrase refers to the fact of an outstanding debt or the amount of such debt.

4. The April, 1985, Notice of Proposed Rulemaking confirms that FEC rules at that time did not adequately address designated contributions made after a general election and that the Commission lacked definitions for the terms "net debts outstanding" and "outstanding debts".

It is unfair for the Commission to apply certain rules and principles to the McConnell Senate Committee which were not in effect at the time of the activities which are the subject of this Matter Under Review.

The McConnell Senate Committee accepted designated contributions after the 1984 general election because of outstanding debts which remained from that election. At no time did the alleged excessive contributions exceed the amount of the outstanding debt, even though at that time the FEC had not provided adequate guidance on how a campaign should handle designated contributions which are received after the general election.

Of the \$24,750 in alleged excessive contributions, \$14,250 was received before McConnell Senate Committee satisfied a \$25,000 debt obligation to its media consultant, Ailes Communications, on February 25, 1985. And the remaining \$10,500 in alleged excessive contributions were received before the Committee resolved its outstanding debt obligation of \$11,378 to one of its other consultants, the Perkins Group, on June 20, 1985. See McConnell Senate Committee 1985 Mid-Year Report, filed July 31, 1985.

There is absolutely no reason for the Commission to be alleging that these contributions were excessive under the FEC rules which were in effect in 1984 and 1985. The rules for post-election designated contributions had yet to be addressed by the Commission, and what limited guidance did exist was followed by the McConnell Senate Committee.

The McConnell Senate Committee relied in good faith on the FEC rules and regulations which were in effect at that time and is entitled, under 2 U.S.C. § 438e, to protection from sanction under the Federal Election Campaign Act for that good faith reliance.

III. The 1985 Transfer By the McConnell Senate Committee Also Was Proper Under the 1985 FEC Rules and Regulations.

After the McConnell Senate Committee satisfied all of its 1984 campaign obligations, it sought to transfer its surplus funds to its campaign committee for the 1990 election.

92040914292

Mr. Lawrence M. Noble
November 6, 1991
Page 8

2 U.S.C. § 439a and 11 C.F.R. § 110.3 (1985) permitted an unlimited transfer of funds from a candidate's previous campaign committee to a current campaign committee so long as none of the contributions are in violation of the limitations which pertain to the 1984 election. All of the contributions accepted after the 1984 general election were within the contribution limitations for that election and were reported in the proper manner as contributions to the 1984 election.

The issue of whether to impose additional limitations on post-general election transfers between candidate committees was clearly unresolved at the time of the 1985 transfer by the McConnell Senate Committee. For example, in its 1987 Rulemaking on Part 110, the Commission requested public comment on whether to apply the "net debts outstanding" formula to "contributions designated for a general election which are transferred to the next election cycle." 50 F.R. 15171 (April 17, 1987).

Two years later, in 1989, the Commission finally resolved this issue by promulgating new aggregation rules for transfers between previous and current candidate campaign committees. See 54 F.R. 34098 (August 17, 1989). It is this new rule which the Commission is now attempting to apply retroactively to a transfer which occurred in 1985.

Once again, the Commission conceded in its 1989 Final Rule that the rules in this area needed to be further developed:

The rules pertaining to transfers of funds between political committees, including campaign committees and party committees, are currently set forth in paragraphs (a)(2) and (c) of § 110.3. The revised rules consolidate these provisions into a single paragraph (c) and resolve several significant points that have been raised regarding transfers. For example, new paragraph (c) clarifies the method used to determine whether the funds transferred between candidate committees contain any impermissible contributions. Id. at 34102.

In this document, the Commission went on to state that "post-election contributions need not be aggregated if they are properly designated for outstanding debts". Id. at 34103.

The designated contributions received by the McConnell Senate Committee after the general election in 1984 were properly designated for outstanding debts under the rules and regulations in place during 1984 and 1985. The new aggregation rules were not in effect at that time, and the FEC even concedes this point in Footnote 14 of its Factual and Legal Analysis of May 13, 1991.

92040914293

Mr. Lawrence M. Noble
November 6, 1991
Page 9

It is patently unfair for the Commission to apply retroactively rules and standards which were not finalized until four years after the transfer in question occurred. The McConnell Senate Committee relied in good faith on the rules and regulations which were in effect during 1985, and is entitled to protection from sanction under 2 U.S.C. § 438e for that good faith reliance.

IV. It Was Completely Impossible For The McConnell Senate Committee To Comply With The Technical Requirements Of The Sixty Day Rule.

As stated in the McConnell Senate Committee's June 24, 1991, letter to the FEC Office of General Counsel, it was completely impossible for the Committee to comply with the technical requirement in the regulations (11 C.F.R. §§ 110.1(b)(3)(i) and 110.2(b)(3)(i)) that any redesignation or refund of a contribution must be accomplished within sixty days from the receipt of the contribution.

The FEC's December 5, 1989, letter to the Committee noted that any excessive contributions should be either refunded or redesignated for the 1990 election. Despite its views about the rules which were in place in 1985 with respect to these activities, the Committee decided to begin the process of redesignating or refunding all contributions which were transferred from the 1984 McConnell Committee. This process started in January, 1990 and was completed—with one exception—by April 3, 1990.

As stated previously in its June 24, 1991, letter to the Commission, the McConnell Committee was unaware of the Commission staff's view about how its 1985 transfer should have been handled until the Committee received the FEC's letter of December 5, 1989. By the time the letter arrived, more than sixty days had already passed since the receipt of every single contribution under "Category B Type Excessives". Thus, it was impossible for the McConnell Committee to have complied with this technical requirement.

The McConnell Committee took prompt action to redesignate or refund each contribution which was part of the 1985 transfer. Many of the contributions were redesignated or refunded within sixty days of December 5, 1989. However, several contributors failed to respond to repeated attempts by the Committee to receive authorization for a redesignation or a refund.

The McConnell Senate Committee used its best efforts to contact these contributors and, on April 3, 1990, issued refunds to those contributors who had not responded by that date. The Committee is entitled to protection under 2 U.S.C. § 432(i) because it has demonstrated that it used its best efforts to obtain the necessary redesignations and refunds required.

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Mr. Lawrence M. Noble
November 6, 1991
Page 10

V. Conclusion.

This letter is intended to help the Office of General Counsel clarify several of the legal issues in this Matter Under Review as seen from the perspective of the respondent. The Committee remains interested in pursuing pre-probable cause conciliation and believes a meeting with the Office of General Counsel would be helpful to resolving this inquiry.

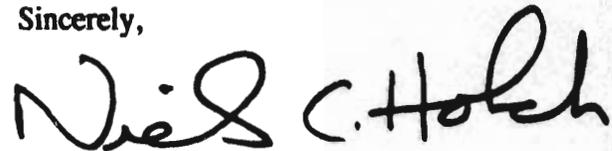
Several months have passed since the Committee's last written communication with the Commission and it is unclear what time frame the Office of General Counsel is following to resolve this inquiry. The Committee is somewhat frustrated by the lack of action on the part of the Commission in moving to complete action on this Matter Under Review.

Almost six months have passed since the Commission's reason to believe finding in this matter and the Office of General Counsel has not drafted any recommendations for an amicable resolution of the allegations involved, nor has the Office contacted the McConnell Senate Committee for a meeting to discuss pre-probable cause conciliation.

By this letter, the McConnell Committee formally requests a meeting with the Office of General Counsel to discuss the factual and legal issues involved in this Matter Under Review. The Committee stands ready to resolve the issues raised by this inquiry in a fair and reasonable manner.

The McConnell Senate Committee appreciates the Office of General Counsel's consideration of the issues presented in this letter and the request by the Committee for a meeting to resolve this Matter Under Review.

Sincerely,



Niels C. Holch
Counsel to the McConnell Senate
Committee

cc: Jonathan Bernstein
Deborah Curry

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McGUINNESS & HOLCH
LAW OFFICES

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Niels C. Holch

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December 16, 1991

Jonathan A. Bernstein
Assistant General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Subject: MUR 3271

Dear Mr. Bernstein:

Thank you for taking the time to meet with Larry Steinberg and me last Thursday to discuss the legal and factual issues involved in MUR 3271.

My client, the McConnell Senate Committee and its Treasurer, Larry Steinberg, formally requests that no further action be taken in this Matter Under Review based on the legal and factual issues raised in our June 24 and November 6, 1991, letters to the Commission.

The Committee and its Treasurer are willing to enter into pre-probable cause conciliation, however, if the Commission decides to pursue this Matter further once its investigation is completed.

Sincerely,

Niels C. Holch
Counsel to the McConnell
Senate Committee

cc: Deborah Curry

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FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SENSITIVE

May 27, 1992

JUN 2 1992

MEMORANDUM

EXECUTIVE SESSION

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

Lois G. Lerner
Associate General Counsel

SUBJECT: Matters Under Review and Exercise of
Prosecutorial Discretion

I. BACKGROUND

In April 1992 this Office circulated a memorandum to the Commission containing a list of cases which we believed warranted the exercise of prosecutorial discretion by the closing of the file. The memorandum also invited the Commission to suggest additional cases for consideration of such action. Presented below are the cases included in our memorandum as well as those suggested to us by a Commissioner for inclusion (as denoted by an asterick).

This report recommends closing certain matters, not closing others, and holding one matter in abeyance. This Office's recommendations as to whether the file should be closed in each matter reflect numerous factors including our present workload, the age of the case, the amount of financial activity involved, and the seriousness of the violation. Closing cases under these circumstances should not necessarily be seen as a decision on how to handle similar cases in the future.

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PAGES 2-15 AND 17-32 DO NOT PERTAIN TO THESE RESPONDENTS.

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7) MUR 3271 (I) McConnell Senate Committee (Opened 4-25-91)

This RAD Referral dates from a 1985 transfer of funds from the McConnell 1984 campaign committee to the 1990 committee, although the aggregation issue that ultimately caused the referral did not arise until 1989-1990. This Office has gone back and forth with counsel on the legal issue in the matter, responding to the argument that before the clarification in the regulations (long after the 1985 transfer) it was not clear that the "net debts outstanding" rule applied to post-general (as vs. post-primary) contributions and if so how. Although the state of the law based on advisory opinions was not so blurred at the time as counsel suggests, we note that the regulations now expressly address both points. Furthermore, it does appear that this treasurer in other respects was scrupulous in complying with legal requirements, and the excessive contributions which resulted from the transfer (approximately \$24,000) represent a small fraction of the Committee's total receipts of more than \$4 million for the 1990 election.

To preserve the resources which would be necessary to try to resolve this matter, and in view of all the circumstances involved, we now recommend the Commission take no further action and close the file in this matter.

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III. RECOMMENDATIONS

1. Take no further action and close the file in:
 - a) MUR 3177
 - b) MUR 3419
 - c) MUR 2745
 - d) MUR 2934
 - e) MUR 3099
 - f) MUR 3127
 - g) MUR 3271
 - h) MUR 3371
 - i) MUR 3441
 - j) MUR 3482
 - k) MUR 3151
 - l) MUR 3239

2. Decline to open a Matter Under Review in:
 - a) RAD Referral 92NF-02
 - b) RAD Referral 91L-76
 - c) Pre-MUR 245

- 3.

4. Approve the appropriate letters containing admonishment language.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Matters Under Review and Exercise) Agenda Document
of Prosecutorial Discretion) #X92-43

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on June 2, 1992, do hereby certify that the Commission took the following actions with respect to the above-captioned matters:

1. Decided by a vote of 5-0 to
 - a) Take no further action and close the file in MUR 3177, MUR 3419, MUR 2745, MUR 3099, MUR 3127, MUR 3271, MUR 3371, MUR 3441, MUR 3482, MUR 3151, and MUR 3239.
 - b) Decline to open a Matter Under Review in RAD Referral 92NF-02, RAD Referral 91L-76, and Pre-MUR 245.
 - c)
 - d) Approve the appropriate letters containing admonishment language, as recommended in the General Counsel's report dated May 27, 1992.

Commissioners Aikens, Elliott, McGarry, Potter, and Thomas voted affirmatively for the decision; Commissioner McDonald was not present at the meeting.

(continued)

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2. Decided by a vote of 4-0 to take no further action and close the file in MUR 2934.

Commissioners Aikens, Elliott, McGarry, and Thomas voted affirmatively for the decision. Commissioner McDonald was not present at the meeting. Commissioner Potter recused with respect to MUR 2934 and did not cast a vote.

Attest:

6-4-92
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED

July 7, 1992

Niels C. Holch, Esquire
McGuinness & Holch
400 North Capitol Street, N.W.
Suite 585
Washington, D.C. 20001

RE: MUR 3271
McConnell Senate Committee '96
and Larry J. Steinberg, as treasurer

Dear Mr. Holch:

On May 13, 1991, the McConnell Senate Committee ("Committee") was notified that the Federal Election Commission found reason to believe the Committee and Larry J. Steinberg, as treasurer violated 2 U.S.C. § 441a(f). The Committee submitted responses to the Commission's reason to believe finding on June 24, 1991 and November 6, 1991.

After considering all the circumstances of the matter, and in the exercise of its prosecutorial discretion, the Commission determined on June 2, 1992, to take no further action against the Committee and its treasurer and closed the file. The Commission reminds you that your acceptance of contributions, that exceeded the contribution limits or that were post-election contributions in excess of the Committee's net debts outstanding and had not been redesignated or otherwise remedied, appear to constitute violations of the Act. Furthermore, such post-election contributions not properly designated for the Committee's net debts outstanding are aggregated with contributions made by the same contributor in the next election and, therefore, may have resulted in additional excessive contributions. You should take immediate steps to insure that this activity does not occur in the future.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following

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Niels C. Holch
Page 2

certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact me at
(202) 219-3400.

Sincerely,


Deborah Curry
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3271

DATE FILMED 7/13/72 CAMERA NO. 3

CAMERAMAN E.E.S.

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