



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4664

DATE FILMED 10-6-97 CAMERA NO. 1

CAMERAMAN JMH

97043841415

REPORTS ANALYSIS REFERRAL  
TO  
OFFICE OF GENERAL COUNSEL

DATE: APR 16 1997

ANALYST: Debbie Manzano

- I. COMMITTEE: Kutak Rock Political Action Committee  
(C00160986)  
Kathryn A. Kidwell, Treasurer  
(12/6/96 - present)  
John P. Giere, Treasurer  
(pre January 1, 1995 -12/5/96)  
1101 Connecticut Avenue NW, Suite 1000  
Washington, DC 20036
- II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(i), (ii), (iii) and (iv)  
11 CFR §104.5(c)(1)(i)(A), (ii)(A), (iii)(A) and  
(2)(i)(B)

III. BACKGROUND:

**Failure to Timely File a Report and Chronic Late Filing of Reports**

Kutak Rock Political Action Committee ("the Committee") has failed to file seven (7) Reports of Receipts and Disbursements in a timely manner for the 1995-1996 election cycle (see chart on page 3). The reports were filed between twenty-nine (29) and one hundred four (104) calendar days late. In addition, the Committee failed to file the 1996 12 Day Pre-General Report, which was required based on activity disclosed in the 1996 30 Day Post-General Report.

On December 29, 1995, the Committee was notified that the 1996 12 Day Pre-General Report was due October 24, 1996 (Attachment 2).

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On March 12, 1996, the Committee filed the 1995 Year End Report which included a cover letter of explanation. The treasurer, John P. Giere, explained that the report had been misplaced. He also stated that future filings would be timely (Attachment 4).

On July 26, 1996, a Chronic Late Filer Notice was sent to the Committee for failing to file the 1995 Year End and 1996 April Quarterly Reports in a timely manner (Attachment 9). The notice advised the Committee that any additional late filing of reports may result in legal enforcement action. Subsequent to the mailing of the Chronic Late Filer Notice, the Committee failed to file the 1996 July Quarterly, 1996 October Quarterly, 1996 12 Day Pre-General, 1996 30 Day Post-General, and 1996 Year End Reports in a timely manner.

On September 30, 1996, the Committee was notified that the 12 Day Pre-General Report was due on October 24, 1996, if it made general election contributions or expenditures from October 1 through October 16 (Attachment 13).

On February 5, 1997, the Committee filed the 1996 30 Day Post-General Report. The Report disclosed \$2,000 in contributions to three (3) federal candidates during the 12 Day Pre-General reporting period (10/01/96-10/16/96), thus requiring the filing of such a report (Attachment 19).

\* The Summary Page has an FEC stamper receipt date of February 5, 1997; however, the Envelope Replacement Page for Incoming Documents shows the report was hand-delivered on February 6, 1997.

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## LATE FILING HISTORY

<u>REPORT TYPE</u>	<u>PRIOR NOTICE</u>	<u>DATE DUE</u>	<u>NON-FILER NOTICE</u>	<u>DATE FILED</u>
1995 Year End (7/01/95-12/31/95)	12/29/95 (Attachment 2)	1/31/96	2/23/96 (Attachment 3)	3/12/96 (Attachment 4)
1996 April Quarterly (1/01/96-3/31/96)	12/29/95 (Attachment 2) 3/22/96 (Attachment 5)	4/15/96	5/08/96 (Attachment 6)	5/14/96 (Attachment 7)
1996 July Quarterly (4/01/96-6/30/96)	12/29/95 (Attachment 2) 6/21/96 (Attachment 8)	7/15/96	8/12/96 (Attachment 10)	8/14/96 (Attachment 11)
1996 October Quarterly (7/01/96-9/30/96)	12/29/95 (Attachment 2) 9/20/96 (Attachment 12)	10/15/96	11/06/96 (Attachment 14) <sup>1</sup>	12/06/96 (Attachment 16)
1996 12 Day Pre-General <sup>2</sup> (10/01/96-10/16/96)	12/29/95 (Attachment 2) 9/30/96 (Attachment 13)	10/24/96	None	2/5/97 (Attachment 19)
1996 30 Day Post-General <sup>2</sup> (10/17/96-11/26/96)	12/29/95 (Attachment 2) 9/30/96 (Attachment 13) 11/8/96 (Attachment 15)	12/05/96	1/06/97 (Attachment 18) <sup>1</sup>	2/5/97 (Attachment 19)
1996 Year End (11/27/96-12/31/96)	12/29/95 (Attachment 2) 12/30/96 (Attachment 17)	1/31/97	2/24/97 (Attachment 20) <sup>1</sup>	3/21/97 (Attachment 21)

<sup>1</sup> The Non-Filer Notice was sent via mailgram.

<sup>2</sup> The Committee filed the 30 Day Post-General Report which included the 12 Day Pre-General reporting period.

FEDERAL ELECTION COMMISSION

DATE 16APR97

1997-1998

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

Attachment 1, page 1 of 2  
PAGE 1

COMMITTEE - DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF	MICROFILM
				PAGES	LOCATION
TYPE OF FILER					
KUTAK ROCK POLITICAL ACTION COMMITTEE					
CONNECTED ORGANIZATION: KUTAK ROCK					
1997 STATEMENT OF ORGANIZATION - AMENDMENT					
TOTAL	0	0	0	2	TOTAL PAGES

ID #C00160986 NON-PARTY QUALIFIED

21MAR97

2 97FEC/191/4179

2 TOTAL PAGES

970443641417

All reports have been reviewed.

Debts and obligations owed to/by the committee: \$0.00

Cash on hand as of 12/31/96: \$19144.09

FEDERAL ELECTION COMMISSION

DATE 16APR97

1995-1996  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

Attachment, page 2 of 2  
PAGE 2

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF	MICROFILM
					PAGES	LOCATION
					TYPE OF FILER	
KUTAK ROCK POLITICAL ACTION COMMITTEE				ID #C00160906 NON-PARTY QUALIFIED		
CONNECTED ORGANIZATION: KUTAK ROCK						
	1995 MID-YEAR REPORT	25,700	10,150	1JAN95 -30JUN95	16	95FEC/993/2314
	YEAR-END	20,200	18,850	1JUL95 -31DEC95	16	96FEC/033/3866
	YEAR-END - AMENDMENT	0	9,250	1JUL95 -31DEC95	15	96FEC/077/3409
	YEAR-END - AMENDMENT	20,200	18,850	1JUL95 -31DEC95	2	96FEC/149/4403
	NOTICE OF FAILURE TO FILE			1JUL95 -31DEC95	2	96FEC/032/1003
	REQUEST FOR ADDITIONAL INFORMATION			1JUL95 -31DEC95	2	96FEC/039/1339
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL95 -31DEC95	3	96FEC/048/5153
	REQUEST FOR ADDITIONAL INFORMATION			1JUL95 -31DEC95	2	96FEC/082/1478
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL95 -31DEC95	3	96FEC/094/3116
	1996 MISCELLANEOUS NOTICE FROM FEC			26JUL96	2	96FEC/070/2324
	APRIL QUARTERLY	0	9,250	1JAN96 -31MAR96	6	96FEC/051/1881
	APRIL QUARTERLY - AMENDMENT	0	9,250	1JAN96 -31MAR96	6	96FEC/077/3426
	APRIL QUARTERLY - AMENDMENT	0	9,250	1JAN96 -31MAR96	3	96FEC/149/4400
	NOTICE OF FAILURE TO FILE			1JAN96 -31MAR96	2	96FEC/049/2678
	REQUEST FOR ADDITIONAL INFORMATION			1JAN96 -31MAR96	2	96FEC/070/0618
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN96 -31MAR96	3	96FEC/072/2486
	REQUEST FOR ADDITIONAL INFORMATION			1JAN96 -31MAR96	2	96FEC/082/1476
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN96 -31MAR96	2	96FEC/094/3114
	JULY QUARTERLY	21,500	10,600	1APR96 -30JUN96	13	96FEC/072/0790
	NOTICE OF FAILURE TO FILE			1APR96 -30JUN96	2	96FEC/071/5439
	OCTOBER QUARTERLY	0	13,950	1JUL96 -30SEP96	6	96FEC/149/4394
	NOTICE OF FAILURE TO FILE			1JUL96 -30SEP96	2	96FEC/127/1109
	REQUEST FOR ADDITIONAL INFORMATION			1JUL96 -30SEP96	2	97FEC/194/3299
	POST-GENERAL	21,300	6,250	1OCT96 -26NOV96	14	97FEC/181/1733
	NOTICE OF FAILURE TO FILE			1OCT96 -25NOV96	2	97FEC/165/0535
	REQUEST FOR ADDITIONAL INFORMATION			1OCT96 -26NOV96	3	97FEC/194/3296
	YEAR-END	0	1,300	26NOV96 -31DEC96	5	97FEC/191/4181
	NOTICE OF FAILURE TO FILE			27NOV96 -31DEC96	2	97FEC/187/0879
	REQUEST FOR ADDITIONAL INFORMATION			26NOV96 -31DEC96	3	97FEC/194/3293
	TOTAL	88,700	70,440		143	TOTAL PAGES

97043041423

# YEAR-END REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 29, 1995

**WHO MUST FILE**,  
Party committees and PACs (nonconnected committees and separate segregated funds) must file a Year-End Report on January 31, 1996.

### REPORT CONTENT AND DATES

#### I. Semiannual Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	07/01/95 - 12/31/95	01/31/96	01/31/96

Semiannual filers must disclose financial activity that occurred from July 1 through December 31, 1995, on their Year-End Report.

#### II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	12/01/95 - 12/31/95	01/31/96	01/31/96

Monthly filers must disclose financial activity from December 1 through December 31, 1995, on their Year-End Report.

### CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from semiannual to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

### LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

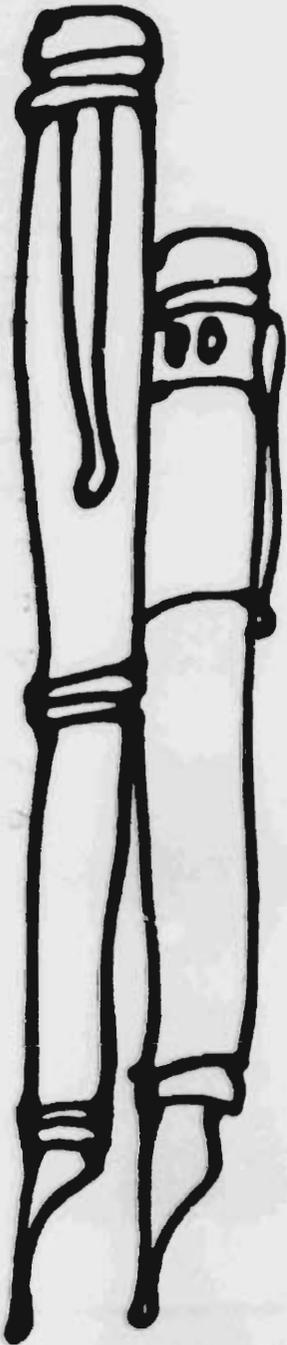
### COMPLIANCE

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

\*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

\*\*Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

(over)



**PARTIES AND PACS**

**YEAR-END**

**1996 FILING SCHEDULE**

**I. Quarterly Filers**

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April	01/01/96 - 03/31/96	04/15/96	04/15/96
July	04/01/96 - 06/30/96	07/15/96	07/15/96
October	07/01/96 - 09/30/96	10/15/96	10/15/96
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
-----24 Hour Reports***-----			
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

**II. Monthly Filers**

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
February	01/01/96 - 01/31/96	02/20/96	02/20/96
March	02/01/96 - 02/29/96	03/20/96	03/20/96
April	03/01/96 - 03/31/96	04/20/96	04/20/96
May	04/01/96 - 04/30/96	05/20/96	05/20/96
June	05/01/96 - 05/31/96	06/20/96	06/20/96
July	06/01/96 - 06/30/96	07/20/96	07/20/96
August	07/01/96 - 07/31/96	08/20/96	08/20/96
September	08/01/96 - 08/31/96	09/20/96	09/20/96
October	09/01/96 - 09/30/96	10/20/96	10/20/96
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
-----24 Hour Reports***-----			
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

\*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

\*\*Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

\*\*\*PACs that make independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours before the election must file 24 Hour Reports. Party committees may not make independent expenditures.

FOR INFORMATION, CALL: 800/424-9530 or 202/219-3420

97043041423



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-7

February 23, 1996

John P. Giere, Treasurer  
Kutak Rock Political Action Committee  
1101 Connecticut Avenue NW  
Washington, DC 20036

Identification Number: C00160986

Reference: Year End Report (7/1/95-12/31/95)

Dear Mr. Giere:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Secretary of the Senate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§108.2, 108.3, 108.4).

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Deborah Manzano on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW  
DEDICATED TO KEEPING THE PUBLIC INFORMED

9970043003210003

**KUTAK ROCK**

A PARTNERSHIP  
INCLUDING PROFESSIONAL CORPORATIONS

SUITE 1000  
1101 CONNECTICUT AVENUE, N.W.  
WASHINGTON, D.C. 20036-4374

202-828-2400  
FACSIMILE 202-828-2488

Mar 12 4 52 PM '96

ATLANTA  
DENVER  
KANSAS CITY  
LITTLE ROCK  
NEW YORK  
OKLAHOMA CITY  
OMAHA  
PHOENIX  
PITTSBURGH

March 12, 1996

Mr. John D. Gibson  
Assistant Staff Director  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

**Re: Year End Report (7/1/95 - 12/31/95)**

Dear Mr. Gibson:

Enclosed please find our committee's Year End Report (7/1/95 - 12/31/95). I apologize for its tardiness. The report was misplaced, therefore presumed mailed. Thank you for your letter informing us our negligence and I assure you that filings in the future will be handled in a timely manner.

Thank you.

Sincerely,

John P. Giere  
President  
Government Relations Group

Enclosure

997 50 04 35 03 24 31 31 82 46 6

For Other Than An Authorized Committee (Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full)  
Kutak Rock Political Action Committee

ADDRESS (number and street)  Check if different than previously reported  
1101 Connecticut Avenue, NW, Suite 1000

CITY, STATE and ZIP CODE  
Washington, DC 20036

2. FEC IDENTIFICATION NUMBER  
C 001 60 036

3.  This committee has qualified as a multicandidate committee (see FEC FORM 1M)

12 4 50 11 30

4. TYPE OF REPORT

- (a)  April 15 Quarterly Report  
 July 15 Quarterly Report  
 October 15 Quarterly Report  
 January 31 Year End Report  
 July 31 Mid Year Report (Non-election Year Only)  
 Termination Report
- Monthly Report Due On  
 February 20  June 20  October 20  
 March 20  July 20  November 20  
 April 20  August 20  December 20  
 May 20  September 20  January 31
- Twelfth day report preceding \_\_\_\_\_ (Type of Election) election on \_\_\_\_\_ in the State of \_\_\_\_\_
- Thirtieth day report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_
- (b) Is this Report an Amendment?  YES  NO

7 8 3 3 0 3 4 9

SUMMARY		COLUMN A	COLUMN B
5 Covering Period 7/1/95 through 12/31/95		This Period	Calendar Year-to-Date
6 (a)	Cash on Hand January 1, 19 95		
	(b) Cash on Hand at Beginning of Reporting Period	\$ 16,434.09	
	(c) Total Receipts (from Line 19)	\$ 20,200.00	\$ 45,900.00
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 36,634.09	\$ 46,784.09
7	Total Disbursements (from Line 30)	\$ 18,850.00	\$ 29,000.00
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 17,784.09	\$ 17,784.09
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0	For further information contact: Federal Election Commission 990 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer John P. Giere

Signature of Treasurer *John Giere*

Date 1/31/95

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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# QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 22, 1996

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April Quarterly	01/01/96 - 03/31/96	04/15/96	04/15/96

#### WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in April.

#### PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1996 Record.

#### 24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee make independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the election day.

#### CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

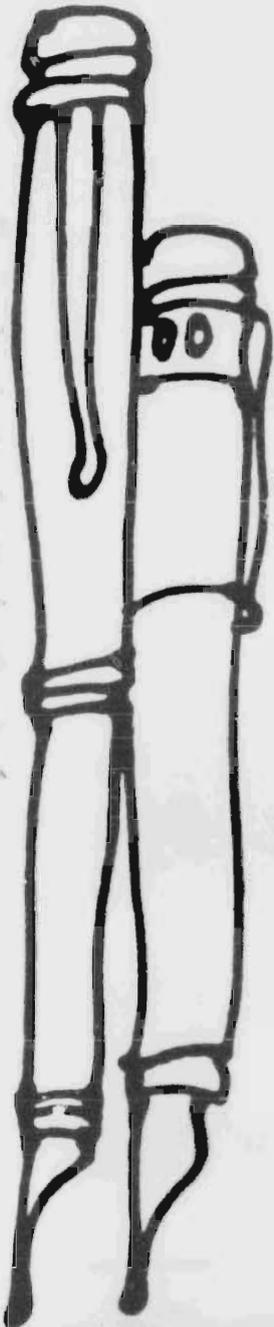
#### LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

\*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

\*\*Reports sent registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

(over)



**PARTIES AND PACS**

**APRIL QUARTERLY**

**COMPLIANCE**

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

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FOR INFORMATION, CALL: 800/424-9530 or 202/219-3420



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-7

May 8, 1996

John P. Giere, Treasurer  
Kutak Rock Political Action Committee  
1101 Connecticut Avenue NW  
Washington, DC 20036

Identification Number: C00160986

Reference: April Quarterly Report (1/1/96-3/31/96)

Dear Mr. Giere:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Secretary of the Senate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§108.2, 108.3, 108.4).

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Deborah Manzano on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

*John D. Gibson*  
John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

99 16 03 04 19 12 02 0

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full)  
Kutak Rock Political Action Committee

ADDRESS (number and street)  Check if different than previously reported  
1101 Connecticut Avenue, NW, #1000

CITY, STATE and ZIP CODE  
Washington, DC 20036

2. FEC IDENTIFICATION NUMBER  
C 001 60986

3.  This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

REC-11  
MAY 11 12 04 PM '96

4. TYPE OF REPORT

- (a)  April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report

- Monthly Report Due On:
- February 20     June 20     October 20
- March 20     July 20     November 20
- April 20     August 20     December 20
- May 20     September 20     January 31
- Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
election on \_\_\_\_\_ in the State of \_\_\_\_\_
- Thirtieth day report following the General Election on \_\_\_\_\_  
in the State of \_\_\_\_\_

(b) Is this Report an Amendment?     YES     NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>1/1/96</u> through <u>3/31/96</u>		
6. (a) Cash on Hand January 1, 19 <u>96</u>		\$ 17,784.09
(b) Cash on Hand at Beginning of Reporting Period	\$ 17,784.09	
(c) Total Receipts (from Line 18)	\$ 0	\$ 0
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 17,784.09	\$ 17,784.09
7. Total Disbursements (from Line 30)	\$ 9,250.00	\$ 9,250.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 8,534.09	\$ 8,534.09
9. Debts and Obligations Owed TO the Committee (Reimburse all on Schedule C and/or Schedule D)	\$ 0	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-421-6532 Local 202-219-3425
10. Debts and Obligations Owed BY the Committee (Reimburse all on Schedule C and/or Schedule D)	\$ 0	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer  
John P. Giere

Signature of Treasurer  
*John P. Giere*

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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Federal Election Commission  
ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

Hand Delivered

DATE OF RECEIPT

First Class Mail

POSTMARKED

Registered/Certified Mail

POSTMARKED

5/11/96

No Postmark

Postmark Illegible

Received from the House Office of Records  
and Registration

DATE OF RECEIPT

Received from the Senate Office of Public  
Records

DATE OF RECEIPT

Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

JM  
PREPARER

5/11/96  
DATE PREPARED

997504330841148300

# QUARTERLY REPORT NOTICE

## FEDERAL ELECTION COMMISSION

**PARTIES AND PACS**

June 21, 1996

**WHO MUST FILE**

Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in July.

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
July Quarterly	04/01/96 - 06/30/96	07/15/96	07/15/96

**PRE-ELECTION REPORTING**

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1996 Record.

**24 HOUR REPORT ON INDEPENDENT EXPENDITURES**

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the election day.

**CHANGE IN FILING FREQUENCY**

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

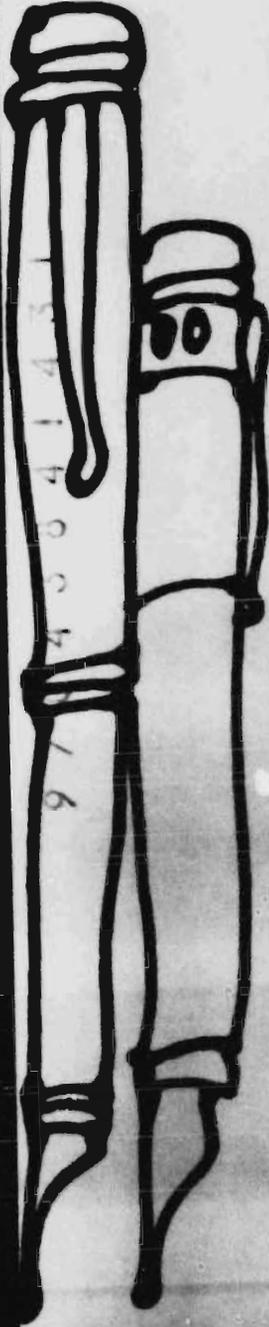
**LABEL**

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

\*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

\*\*Reports sent registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

(over)



**PARTIES AND PACS**

**JULY QUARTERLY**

**COMPLIANCE**

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

97043841432

**FOR INFORMATION, Call: 800/424-9530 or 202/219-3420**



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

NE-L

John P. Giere, Treasurer  
Kutak Rock Political Action  
Committee  
1101 Connecticut Avenue, NW  
Washington, DC 20036

JUL 26 1996

Identification Number: C00160986

Reference: 1995-1996 Election Cycle Reports

Dear Mr. Giere:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. §434(a), by failing to timely file Reports of Receipts and Disbursements. The following is a list of the reports in question.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Year End (07/01/95-12/31/95)	01/31/96	03/12/96
April Quarterly (01/01/96-03/31/96)	04/15/96	05/14/96

Timely filing is a specific requirement of the Federal Election Campaign Act ("the Act") and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views failure to timely file reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending before the Commission, any additional report which is not submitted in a timely manner by your committee may result in the Commission initiating legal enforcement or audit action.

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact Debbie Manzano on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Lisa J. Stolaruk  
Chief, Party/Non-Party Branch  
Reports Analysis Division

97043841433



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RG-7

August 12, 1996

John P. Giere, Treasurer  
 Kutak Rock Political Action Committee  
 1101 Connecticut Avenue NW  
 Washington, DC 20036

Identification Number: C00160986

Reference: July Quarterly Report (4/1/96-6/30/96)

Dear Mr. Giere:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Secretary of the Senate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§108.2, 108.3, 108.4).

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Deborah Manzano on our toll-free number (800) 424-9538. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson  
 Assistant Staff Director  
 Reports Analysis Division

97043841434

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Candidate  
(Summary Page)

RECEIVED  
FEDERAL ELECTION  
COMMISSION MAIL ROOM

AUG 14 2 40 PM '96

USE FEC MAILING LABEL  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full)  
Kutak Rock Political Action Committee

ADDRESS (number and street)  Check if different than previously reported  
1101 Connecticut Avenue, NW #1000

CITY, STATE and ZIP CODE  
Washington, DC 20036

2. FEC IDENTIFICATION NUMBER  
C 001 60986

3.  This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

### 4. TYPE OF REPORT

- (a) April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report

- Monthly Report Due On:
- February 20
  - March 20
  - April 20
  - May 20
  - June 20
  - July 20
  - August 20
  - September 20
  - October 20
  - November 20
  - December 20
  - January 31
- Twelfth day report preceding \_\_\_\_\_ (Type of Election) election on \_\_\_\_\_ in the State of \_\_\_\_\_
- Thirtieth day report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_

(b) Is this Report an Amendment?  YES  NO

SUMMARY		COLUMN A	COLUMN B
6. Covering Period 4/1/96 through 6/30/96		This Period	Calendar Year-to-Date
8. (a)	Cash on Hand January 1, 1996		\$ 17,784.09
(b)	Cash on Hand at Beginning of Reporting Period	\$ 8,534.09	
(c)	Total Receipts (from Line 10)	\$ 21,500.00	\$ 21,500.00
(d)	Subtotal (add Lines 8(b) and 8(c) for Column A and Lines 8(a) and 8(c) for Column B)	\$ 30,034.09	\$ 39,284.09
7.	Total Disbursements (from Line 20)	\$ 10,690.00	\$ 19,940.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 8(d))	\$ 19,344.09	\$ 19,344.09
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Tel: Free 800-424-9530 Local: 202-219-3438
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer  
John P. Giere

Signature of Treasurer  
*John P. Giere*

Date  
7/15/96

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 5307.

97043846.633.072.0790

# QUARTERLY REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 20, 1996

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
October Quarterly	07/01/96 - 09/30/96	10/15/96	10/15/96

**WHO MUST FILE:**

Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in October.

**PRE-ELECTION REPORTING**

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1996 Record.

**24 HOUR REPORT ON INDEPENDENT EXPENDITURES**

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the election day.

**CHANGE IN FILING FREQUENCY**

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

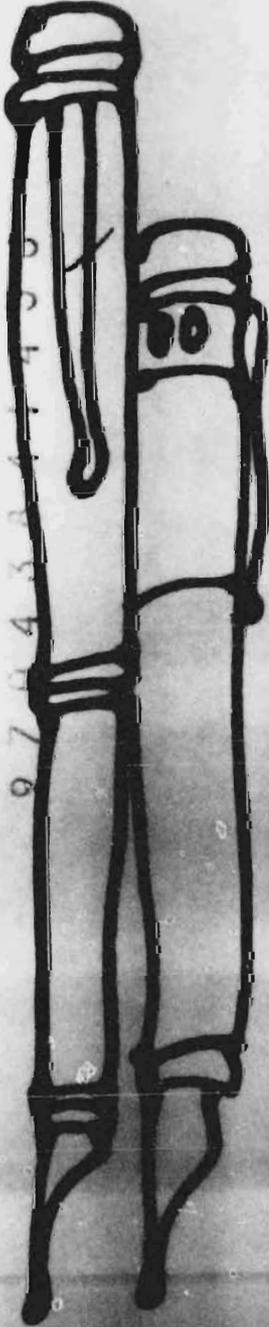
**LABEL**

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

\*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

\*\*Reports sent registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

(over)



**PARTIES AND PACS**

**OCTOBER QUARTERLY**

**COMPLIANCE**

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

97043841437

FOR INFORMATION, Call: 800/424-9530 or 202/219-3420

# GENERAL ELECTION REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 30, 1996

I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT.	
		MAILING DATE**	FILING DATE
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16

REPORT	REPORTING PERIOD*	REG./CERT.	
		MAILING DATE**	FILING DATE
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96

III. QUARTERLY FILERS THAT DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16\*\*\*

REPORT	REPORTING PERIOD*	REG./CERT.	
		MAILING DATE**	FILING DATE
Post-General	10/01/96 - 11/25/96	12/05/96	12/05/96

WHO MUST FILE

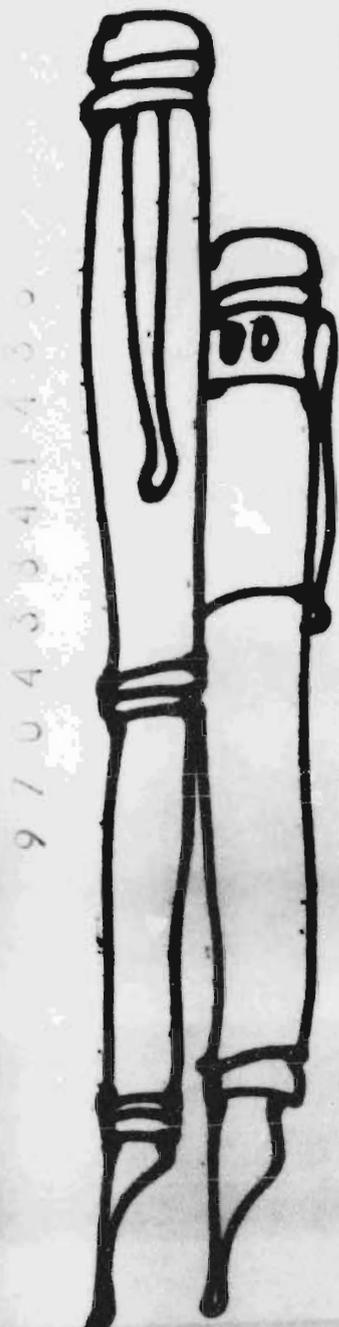
Party committees and PACs must follow the above charts in order to determine whether they must file a report 12 days before the general election on November 5 (the Pre-General Report). All Party committees and PACs, regardless of financial activity, must file a report 30 days after the general election (the Post-General Election Report).

\*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

\*\*Reports sent registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

\*\*\*Committees that made general election contributions or expenditures before October 1 and did not previously report them must also follow Chart II reporting requirements.

(over)



97043341433

**PARTIES AND PACS**

**PRE/POST GENERAL ELECTION**

**24 HOUR REPORT ON INDEPENDENT EXPENDITURES**

Any PAC that makes independent expenditures aggregating \$1,000 or more during the period beginning October 17 and ending November 3 must report them within 24 hours.

**LABEL**

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

**COMPLIANCE**

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

9 / 0 4 3 0 4 1 4 3 7

**FOR INFORMATION, CALL: 800/424-9530 or 202/219-3420**

RQ-7

(This is a copy of the text of a mailgram sent to the committee listed below on November 6, 1996.)

John P. Giere, Treasurer  
Kutak Rock Political Action Committee  
1101 Connecticut Avenue NW  
Washington, DC 20036

Identification Number: C00160986

Reference: OCTOBER QUARTERLY REPORT (7/1/96-9/30/96)

Dear Mr. Giere:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Secretary of the Senate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§108.2, 108.3, 108.4).

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Deborah Manzano on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

9704384144C

**GENERAL ELECTION  
REPORT NOTICE**

**FEDERAL ELECTION COMMISSION**



**REMINDER**

**REMINDER**

**REMINDER**

**November 8, 1996**

All party committees and PACs (nonconnected committees and separate segregated funds) must file a Post-General Election Report. Reports sent by registered or certified mail must be postmarked by the mailing date (December 5, 1996); otherwise, they must be received by the filing date (December 5, 1996). FEC Form 3X is enclosed.

97043841441

**FOR INFORMATION, CALL: 800/424-9530 or 202/219-3420**

# REPORT OF RECEIPTS AND DISBURSEMENTS

Attachment 16

For Other Than An Authorized Committee  
(Summary Page)

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

DEC 6 4 11 PM '96

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full)  
KUTAK ROCK POLITICAL ACTION COMMITTEE

ADDRESS (number and street)  Check if different than previously reported  
1101 Connecticut Avenue, NW, Suite 1000

CITY, STATE and ZIP CODE  
Washington, DC 20036

2. FEC IDENTIFICATION NUMBER  
C001 60986

3.  This committee has qualified as a political candidate committee. (see FEC FORM 1M)

### 4. TYPE OF REPORT

- (a)  April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report

- Monthly Report Due On:
- February 20
  - March 20
  - April 20
  - May 20
  - June 20
  - July 20
  - August 20
  - September 20
  - October 20
  - November 20
  - December 20
  - January 31

- Twelfth day report preceding \_\_\_\_\_ (Type of Election) election on \_\_\_\_\_ in the State of \_\_\_\_\_
- Thirtieth day report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_

(b) Is this Report an Amendment?  YES  NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	7/1/96 through 9/30/96		
6. (a)	Cash on Hand January 1, 1996		\$ 17,784.09
(b)	Cash on Hand at Beginning of Reporting Period	\$ 19,344.09	
(c)	Total Receipts (from Line 19)	\$ 0	\$ 21,500.00
(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 19,344.09	\$ 39,284.09
7.	Total Disbursements (from Line 30)	\$ 13,950.00	\$ 33,890.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 5,394.09	\$ 5,394.09
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0	
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0	

For further information contact:  
Federal Election Commission  
900 E Street, NW  
Washington, DC 20463  
Toll Free 800-424-9530  
Local 202-219-3420

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer  
Kathryn A. Kidwell

Signature of Treasurer  
*Kathryn A. Kidwell*

Date  
12-6-96

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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9704004144

# YEAR-END REPORT NOTICE

## FEDERAL ELECTION COMMISSION

**PARTIES AND PACS**

December 30, 1996

**QUARTERLY AND MONTHLY FILERS**

REPORT	REPORTING PERIOD*	REG./CERT.	FILING
		MAILING DATE**	DATE
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

**WHO MUST FILE**

All party committees and PACs (nonconnected committees and separate segregated funds) must file a Year-End Report.

**LABEL**

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

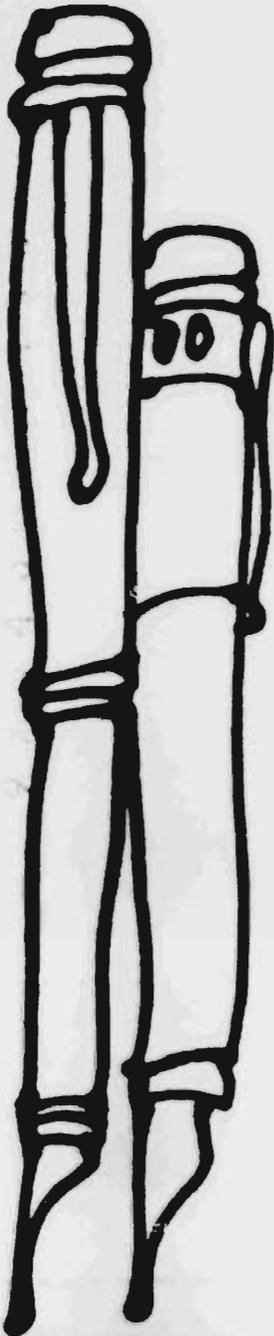
**COMPLIANCE**

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

\*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

\*\*Reports sent registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

(over)



PARTIES AND PACS

YEAR-END

1997 REPORTING SCHEDULE  
PARTIES AND PACS\*

## I. SEMIANNUAL FILERS\*\*

REPORT	REPORTING PERIOD	REG./CERT.	
		MAILING DATE***	FILING DATE
Mid-Year	01/01/97 - 06/30/97	07/31/97	07/31/97
Year-End	07/01/97 - 12/31/97	01/31/98	01/31/98

## II. MONTHLY FILERS

REPORT	REPORTING PERIOD	REG./CERT.	
		MAILING DATE***	FILING DATE
February	01/01/97 - 01/31/97	02/20/97	02/20/97
March	02/01/97 - 02/28/97	03/20/97	03/20/97
April	03/01/97 - 03/31/97	04/20/97	04/20/97
May	04/01/97 - 04/30/97	05/20/97	05/20/97
June	05/01/97 - 05/31/97	06/20/97	06/20/97
July	06/01/97 - 06/30/97	07/20/97	07/20/97
August	07/01/97 - 07/31/97	08/20/97	08/20/97
September	08/01/97 - 08/31/97	09/20/97	09/20/97
October	09/01/97 - 09/30/97	10/20/97	10/20/97
November	10/01/97 - 10/31/97	11/20/97	11/20/97
December	11/01/97 - 11/30/97	12/20/97	12/20/97
Year-End	12/01/97 - 12/31/97	01/31/98	01/31/98

\*Committees that wish to change their filing status must notify the Commission in writing when they file their next report due under their current reporting schedule.

\*\*Committees that filed quarterly reports in 1996 are only required to file semiannually in 1997.

\*\*\*Reports sent registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

FOR MORE INFORMATION CALL: 800/424-9530 OR 202/219-3420

97043841444

RQ-7

(This is a copy of the text of a mailgram sent to the committee listed below on January 6, 1997.)

John P. Giere, Treasurer  
Kutak Rock Political Action Committee  
1101 Connecticut Avenue NW  
Washington, DC 20036

Identification Number: C00160986

Reference: 30 Day Post-General Report (10/1/96-11/25/96)

Dear Mr. Giere:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Secretary of the Senate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer. 11 CFR §§108.2, 108.3, 108.4

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Debbie Manzano on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

RECEIVED  
FEDERAL ELECTION  
COMMISSION MAIL ROOM

FEB 5 5 01 PM '97

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full)  
KUTAK ROCK POLITICAL ACTION COMMITTEE

ADDRESS (number and street)  Check if different than previously reported  
1101 Connecticut Avenue, NW, Suite 1000

CITY, STATE and ZIP CODE  
Washington, DC 20036

2. FEC IDENTIFICATION NUMBER  
C001 60986

3.  This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

4. TYPE OF REPORT

- (a)  April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report

Monthly Report Due On:

- February 20
- March 20
- April 20
- May 20
- June 20
- July 20
- August 20
- September 20
- October 20
- November 20
- December 20
- January 31

- Twelfth day report preceding General (Type of Election)  
election on 11/3/96 in the State of District of Columbia
- Thirtieth day report following the General Election on  
11/3/96 in the State of District of Columbia

(b) Is this Report an Amendment?  YES  NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>10/1/96</u> through <u>11/26/96</u>		
6. (a) Cash on Hand January 1, 19 <u>96</u>		\$ 17,784.09
(b) Cash on Hand at Beginning of Reporting Period	\$ 5,394.09	
(c) Total Receipts (from Line 19)	\$ 21,300.00	\$ 42,800.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 26,694.09	\$ 60,584.09
7. Total Disbursements (from Line 30)	\$ 6,250.00	\$ 40,140.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 20,444.09	\$ 20,444.09
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0.00	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0.00	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Kathryn A. Kidwell

Signature of Treasurer

*Kathryn A. Kidwell*

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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FEC FORM 3X

(revised 9/93)

Use separate schedule(s) for each category of the Detailed Summary Page	PAGE 1	OF 1
	FOR LINE NUMBER 23	

**SCHEDULE B ITEMIZED DISBURSEMENTS**

Contributions to Federal Candidates

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

**NAME OF COMMITTEE (In Full)**  
Kutak Rock Political Action Committee

97043841447

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Committee to Elect Winston Bryant	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/3/96	500.00
B. Full Name, Mailing Address and ZIP Code Ken Bentsen for Congress Committee	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/03	500.00
C. Full Name, Mailing Address and ZIP Code Hagel for Nebraska	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/10/96	250.00
D. Full Name, Mailing Address and ZIP Code Hagel for Nebraska	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/10/96	750.00
E. Full Name, Mailing Address and ZIP Code Friends of Senator Larry Pressler	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/23/96	1,000.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

<b>SUBTOTAL</b> of Disbursements This Page (optional) .....	
<b>TOTAL</b> This Period (last page this line number only) .....	<b>\$3,000.00</b>

Federal Election Commission  
**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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DATE OF RECEIPT  
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and Registration

DATE OF RECEIPT

Received from the Senate Office of Public  
Records

DATE OF RECEIPT

Other (Specify):

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and/or DATE OF RECEIPT

ML  
PREPARER

2/6/97  
DATE PREPARED

97045041445

FEB 24 1997

WESTERN  
UNION

ELECTRONIC MAIL SERVICES  
CONFIRMATION OF MAILGRAM TO: KUTAK ROCK POLITICAL ACTION COMMITTEE  
JOHN P GIERE  
1101 CONNECTICUT AVE NW  
WASHINGTON DC 20036-4303

FEDERAL ELECTION COMMISSION  
SHAWN WERTH  
999 E ST. NW.  
WASHINGTON DC 204630001

IDENTIFICATION NUMBER: C00160986

REFERENCE: YEAR-END (11/27/96 - 12/31/1996)

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT.

IT IS IMPORTANT THAT YOU FILE THIS REPORT IMMEDIATELY WITH THE FEDERAL ELECTION COMMISSION, 999 E STREET, N.W., WASHINGTON, D.C. 20463 OR WITH THE SECRETARY OF THE SENATE. A COPY OF THE REPORT OR RELEVANT PORTIONS SHOULD ALSO BE FILED WITH THE APPROPRIATE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER.

ALTHOUGH THE COMMISSION MAY INITIATE AN AUDIT OR LEGAL ENFORCEMENT ACTION CONCERNING THIS MATTER, YOUR PROMPT RESPONSE AND LETTER OF EXPLANATION WILL BE TAKEN INTO CONSIDERATION.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT DEBORAH A. MANZANO ON OUR TOLL FREE NUMBER (800)424-9530 OR ON OUR LOCAL NUMBER (202)219-3580.

SINCERELY,

JOHN D. GIBSON  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

# REPORT OF RECEIPTS AND DISBURSEMENTS

Attachment 21

For Other Than An Authorized Committee  
(Summary Page)

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
REPORTS ANALYSIS  
DIVISION

MAR 21 4 41 PM '97

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Kutak Rock Political Action Committee		2. FEC IDENTIFICATION NUMBER C001 60986
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 1101 Connecticut Avenue, NW Suite 1000		
CITY, STATE and ZIP CODE Washington, DC 20036		
3. <input checked="" type="checkbox"/> This committee has qualified as a multicandidate committee. (see FEC FORM 1M)		

## 4. TYPE OF REPORT

(a)  April 15 Quarterly Report

July 15 Quarterly Report

October 15 Quarterly Report

January 31 Year End Report

July 31 Mid Year Report (Non-election Year Only)

Termination Report

Monthly Report Due On:

February 20  June 20  October 20

March 20  July 20  November 20

April 20  August 20  December 20

May 20  September 20  January 31

Twelfth day report preceding \_\_\_\_\_  
(Type of Election)

election on \_\_\_\_\_ in the State of \_\_\_\_\_

Thirtieth day report following the General Election on \_\_\_\_\_

\_\_\_\_\_ in the State of \_\_\_\_\_

(b) Is this Report an Amendment?  YES  NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 11/26/96 through 12/31/96		
6. (a) Cash on Hand January 1, 19 96		\$ 17,784.09
(b) Cash on Hand at Beginning of Reporting Period	\$ 20,444.09	
(c) Total Receipts (from Line 19)	\$ 0	\$ 42,800.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 20,444.09	\$ 60,584.09
7. Total Disbursements (from Line 30)	\$ 11,300.00	\$ 41,440.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 19,144.09	\$ 19,144.09
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Kathryn A. Kidwell

Signature of Treasurer

*Kathryn A. Kidwell*

Date

3/21/97

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

--	--	--	--	--	--	--	--	--	--

FEC FORM 3X  
(revised 9/93)

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

FEDERAL ELECTION COMMISSION  
JUL 17 4 30 PM '97

FIRST GENERAL COUNSEL'S REPORT

**SENSITIVE**

RAD REFERRAL: 97NF-10  
DATE ACTIVATED: April 29, 1997

STAFF MEMBER: Tracey Ligon  
Stephanie King

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Kutak Rock Political Action Committee  
and Kathryn A. Kidwell, as Treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(A)  
11 CFR § 104.5(c)(1), (2)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

**I. GENERATION OF MATTER**

The Reports Analysis Division ("RAD") referred the Kutak Rock Political Action Committee and its treasurer, ("Committee"), to the Office of the General Counsel on April 29, 1997.<sup>1</sup> The basis for the RAD referral is the failure of the Committee to timely file the 1995 Year End Report, 1996 April Quarterly, 1996 July Quarterly, 1996 October Quarterly, 1996 12 Day Pre-General Report, 1996 30 Day Post-General Report, and the 1996 Year End Report.

<sup>1</sup> The current treasurer, Kathryn A. Kidwell, did not assume office until December 6, 1996, after these reporting violations occurred. The violations occurred during the tenure of John P. Giere (pre January 1, 1995-January 5, 1996).

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**II. FACTUAL AND LEGAL ANALYSIS**

Based on the Factual and Legal Analysis, see Attachment 1, this Office recommends the Federal Election Commission ("the Commission") find reason to believe the respondents violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii), (iv).

**III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY**

This Office also recommends that the Commission offer to enter into conciliation with the respondents prior to a finding of probable cause to believe. Attached for the Commission's approval is a proposed conciliation agreement.

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**IV. RECOMMENDATIONS**

- 1. Open a MUR.
- 2. Find reason to believe that the Kutak Rock Political Action Committee and Kathryn A. Kidwell, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii), and (iv).
- 3. Enter into conciliation prior to a finding of probable cause to believe.
- 4. Approve the attached Factual and Legal Analysis.
- 5. Approve the attached Conciliation Agreement.
- 6. Approve the appropriate letters.

97043841458

Lawrence M. Noble  
General Counsel

7/17/97  
Date

BY: [Signature]  
Lois G. Lerner  
Associate General Counsel

**Attachments:**

- 1. Factual and Legal Analysis
- 2. Proposed Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

Kutak Rock Political Action )  
Committee and Kathryn A. Kidwell, )  
as Treasurer. )

RAD Referral )  
#97NF-10 )

MUR 4664

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 23, 1997, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral #97NF-10:

1. Open a MUR.
2. Find reason to believe that the Kutak Rock Political Action Committee and Kathryn A. Kidwell, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii), and (iv).
3. Enter into conciliation prior to a finding of probable cause to believe.
4. Approve the Factual and Legal Analysis, as recommended in the General Counsel's Report dated July 17, 1997.

(continued)

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5. Approve the Conciliation Agreement, as recommended in the General Counsel's Report dated July 17, 1997.
  
6. Approve the appropriate letters, as recommended in the General Counsel's Report dated July 17, 1997.

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

Attest:

7-24-97  
Date

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

Received in the Secretariat: Thurs., July 17, 1997 4:06 p.m.  
Circulated to the Commission: Fri., July 18, 1997 11:00 a.m.  
Deadline for vote: Wed., July 23, 1997 4:00 p.m.

bjr

9704384146C



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 31, 1997

Kathryn A. Kidwell, Treasurer  
Kutak Rock Political Action Committee  
1101 Connecticut Avenue NW, Suite 1000  
Washington, DC 20036

RE: MUR 4664

Dear Ms. Kidwell:

On July 23, 1997, the Federal Election Commission found that there is reason to believe the Kutak Rock Political Action Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii), and (iv), provisions 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.

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 additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation, and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

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.

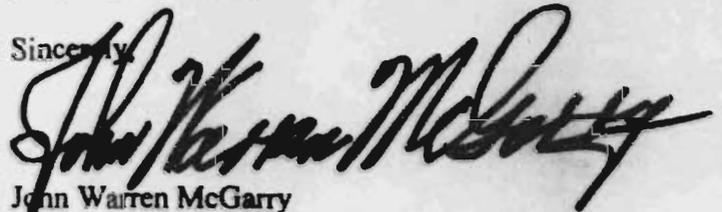
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If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other 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 Tracey L. Ligon, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,



John Warren McGarry  
Chairman

- Enclosures
- Factual and Legal Analysis
  - Procedures
  - Designation of Counsel Form
  - Conciliation Agreement

97043841462

FEDERAL ELECTION COMMISSION  
FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Kutak Rock Political Action Committee  
and Kathryn A. Kidwell, as Treasurer

MUR: 4664

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. 437g(a)(2).

A. THE LAW

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that all political committees other than authorized committees of a candidate file either quarterly or monthly reports. The relevant provisions for quarterly report filings are as follows. In a calendar year in which a regularly scheduled general election is held, quarterly reports shall be filed no later than the 15th day after the last day of each calendar quarter: except the report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year. 2 U.S.C. §434(a)(4)(A)(i). The Act requires that a pre-election report be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) any election in which the committee makes a contribution to or expenditure on behalf of a candidate; such report shall be complete as of the 20th day before the election. 2 U.S.C. §434(a)(4)(A)(ii). The Act also requires the committee to file a post-general election report no later than the 30th day after the general election which shall be complete as of

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the 20th day after the general election. 2 U.S.C. § 434(a)(4)(A)(iii). In any other calendar year, reports covering the period beginning January 1 and ending June 30, must be filed no later than July 31, and reports covering the period beginning July 1 and ending December 31, must be filed no later than January 31 of the following calendar year.

2 U.S.C. § 434(a)(4)(A)(iv).

Pursuant to Section 434(a)(1), the treasurer of a political committee shall file reports of receipts and disbursements in accordance with the provisions of that subsection.

**B. THE FACTS**

The Kutak Rock Political Action Committee ("the Committee") is a political committee that is not an authorized committee of a candidate. The Committee elected to file reports on a quarterly basis.

The respondents were required to file the 1995 Year-End Report no later than January 31, 1996; and the 1996 Year End Report no later than January 31, 1997. Respondents were also required to file the 1996 April Quarterly Report no later than April 15, 1996; the 1996 July Quarterly Report no later than July 15, 1996; and the 1996 October Quarterly Report no later than October 15, 1996. In addition, respondents were required to file the 1996 12 Day Pre-General Report no later than October 24, 1996 and the 1996 30 Day Post-General Report no later than December 5, 1996.

Respondents failed to timely file the following reports. The 1995 Year End Report, which disclosed \$20,200 in receipts and \$18,850 in disbursements, was not filed until March 12, 1996, 41 days late. The 1996 April Quarterly Report, which disclosed \$0 in receipts and \$9,250 in disbursements, was not filed until May 14, 1996, 29 days late. The 1996 July Quarterly

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Report, which disclosed \$21,500 in receipts and \$10,690 in disbursements, was not filed until August 14, 1996, 30 days late. The 1996 October Quarterly Report, which disclosed \$0 in receipts and \$13,950 in disbursements, was not filed until December 6, 1996, 52 days late. The 1996 Pre-General Report, which disclosed \$21,300 in receipts and \$3,750 in disbursements, was not filed until February 5, 1997, 104 days late. The 1996 Post-General Report, which disclosed \$0 in receipts and \$2,500 in disbursements, was not filed until February 5, 1997, 62 days late. The 1996 Year End Report, which disclosed \$0 in receipts and \$1,300 in disbursements, was not filed until February 21, 1997, 24 days late.

Prior notices were mailed to the committee informing it of the due dates for filing each of the reports at issue. Following each of the due dates, separate non-filer notices for each of the reports except the 1996 12 Day Pre-General Report were mailed to the committee stating it failed to file the reports at issue and advising it to file the reports immediately. Although the Committee was given prior notice of when to file reports, it continued to submit reports after their due dates during the 1995-1996 election cycle.

Therefore, there is reason to believe that the ~~Kutak~~ Rock Political Action Committee and Kathryn A. Kidwell, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii), and (iv).

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Kutak Rock Political Action Committee and  
Kathryn A. Kidwell, as treasurer

)  
)  
)  
)

MUR 4664

**SENSITIVE**

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a revised conciliation agreement which has been submitted on behalf of Kutak Rock Political Action Committee and Kathryn A. Kidwell, as treasurer. On July 23, 1997, the Commission found that Respondents violated 2 U.S.C. § 434(a)(4)(A) by failing to file reports in a timely manner. The Commission simultaneously entered into conciliation prior to a finding of probable cause to believe and approved a conciliation agreement

A. Counteroffer

Attached is a counteroffer which has been signed by Kathryn A. Kidwell, the treasurer of the Kutak Rock Political Action Committee.

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This Office recommends that the Commission accept the attached conciliation agreement

II. RECOMMENDATIONS

- 1. Accept the attached conciliation agreement with Kutak Rock Political Action Committee and Kathryn A. Kidwell, as treasurer.
- 2. Approve the appropriate letter.
- 3. Close the file.

Lawrence M. Noble  
General Counsel

April 27, 1997  
Date

BY: Lois G. Lerner  
Associate General Counsel

Attachments:

- 1. Conciliation Agreement
- 2. Photocopy of civil penalty check

Staff Assigned: Stephanie King  
Tracey Ligon

97043841467

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Kutak Rock Political Action ) MUR 4664  
Committee and Kathryn A. Kidwell, )  
as treasurer. )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 11, 1997, the Commission decided by a vote of 5-0 to take the following actions in MUR 4664:

1. Accept the conciliation agreement with Kutak Rock Political Action Committee and Kathryn A. Kidwell, as treasurer, as recommended in the General Counsel's Report dated August 25, 1997.
2. Approve the appropriate letter, as recommended in the General Counsel's Report dated August 25, 1997.
3. Close the file.

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

Attest:

9-11-97  
Date

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

Received in the Secretariat: Mon., Sept. 08, 1997 2:59 p.m.  
Circulated to the Commission: Tues., Sept. 09, 1997 11:00 a.m.  
Deadline for vote: Fri., Sept. 12, 1997 4:00 p.m.

bjr



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

September 15, 1997

Kathryn A. Kidwell, Treasurer  
Kutak Rock Political Action Committee  
1101 Connecticut Avenue NW  
Suite 1000  
Washington, DC 20036

RE: MUR 4664

Dear Ms. Kidwell:

On September 11, 1997, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of a violation of 2 U.S.C. § 434(a)(A)(i), (ii), (iii), and (iv), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

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 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.

Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

*Stephanie King*  
Stephanie King  
Paralegal

Enclosure  
Conciliation Agreement

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RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL

2 07 PM '97  
AUG 15

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 4664  
Kutak Rock Political Action Committee )  
and Kathryn A. Kidwell, as Treasurer )

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Kutak Rock Political Action Committee and Kathryn A. Kidwell, as treasurer ("Respondents"), violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii) and (iv).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. The Kutak Rock Political Action Committee ("Committee") is a political committee within the meaning of 2 U.S.C. § 431(4) and is not an authorized committee of any

97043041470

candidate. The Committee elected to file its reports with the Commission on a quarterly basis.

2. Kathryn A. Kidwell is the treasurer of the Kutak Rock Political Action Committee.

3. The Federal Election Campaign Act of 1971, as amended ("the Act"), requires all political committees other than authorized committees of a candidate to file either quarterly or monthly reports. The relevant provisions for quarterly report filing are as follows. In a calendar year in which a regularly scheduled general election is held, quarterly reports must be filed no later than the 15th day after the last day of each calendar quarter: except the report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(i). A pre-election report must be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election, and which shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii). The Act also requires that the committee file a post-general election report no later than the 30th day after the general election which shall be complete as of the 20th day after the general election. 2 U.S.C. § 434(a)(4)(A)(iii). In any other calendar year, reports covering the period beginning January 1 and ending June 30, must be filed no later than July 31, and reports covering the period beginning July 1 and ending December 31, must be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv). Pursuant to Section 434(a)(1), the treasurer of a political committee shall file reports of receipts and disbursements in accordance with the provisions of that subsection.

4. The respondents were required to file the 1995 Year End Report no later than January 31, 1996 and the 1996 Year End Report no later than January 31, 1997. Respondents

were also required to file the 1996 April Quarterly Report no later than April 15, 1996; the 1996 July Quarterly Report no later than July 15, 1996, and the 1996 October Quarterly Report no later than October 15, 1996. In addition, respondents were required to file the 1996 Pre General Report no later than October 24, 1996 and the 1996 Post General Report no later than December 5, 1996.

5. Respondents failed to timely file the following reports. The 1995 Year End Report, which disclosed \$20,200 in receipts and \$18,850 in disbursements, was not filed until March 12, 1996, 41 days late. The 1996 April Quarterly Report, which disclosed \$0 in receipts and \$9,250 in disbursements, was not filed until May 14, 1996, 29 days late. The 1996 July Quarterly Report, which disclosed \$21,500 in receipts and \$10,690 in disbursements, was not filed until August 14, 1996, 30 days late. The 1996 October Quarterly Report, which disclosed \$0 in receipts and \$13,950 in disbursements, was not filed until December 6, 1996, 52 days late. The 1996 Pre-General Report, which disclosed \$21,300 in receipts and \$3,750 in disbursements, was not filed until February 5, 1997, 104 days late. The 1996 Post-General Report, which disclosed \$0 in receipts and \$2,500 in disbursements, was not filed until February 5, 1997, 62 days late. The 1996 Year End Report, which disclosed \$0 in receipts and \$1,300 in disbursements, was not filed until February 24, 1997, 24 days late.

6. The Commission mailed prior notices to the respondents informing them of the due dates for filing each of the reports at issue. In addition, shortly following the passage of each of the due dates, the Commission mailed separate notices to the respondents for each of the reports except the 1996 12 Day Pre-General Report advising that the respondents had failed to file the

reports and instructing the respondents to file the reports immediately.

V. The respondents failed to timely file the 1995 and 1996 Year End Reports, the 1996 April Quarterly Report, the 1996 July Quarterly Report, the 1996 October Quarterly Report, and the 1996 Pre-General and Post General Reports in violation of 2 U.S.C. § 434(a)(4)(A).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of three thousand seven hundred fifty dollars (\$3,750) pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner by AAS  
Lois G. Lerner  
Associate General Counsel

9/15/97  
Date

FOR THE RESPONDENTS:

Kathryn A. Kidwell  
(Name) Kathryn A. Kidwell  
(Position) Administrative Manager

August 19, 1997  
Date

97043041474

**KUTAK ROCK**  
SUITE 1000  
1101 CONNECTICUT AVE., N.W.  
WASHINGTON, DC 20036-4374

NATIONSBANK OF DC, N.A.  
WASHINGTON, DC  
15-120/540

377566

PAY TO THE ORDER OF

THE SUM 3750 DOLLARS AND 00 CENTS\*\*\*\*\*

Federal Election Commission  
999 E. Street, NW 6th Floor  
Washington, D.C. 20463

999999

DATE: August 19, 1997

AMOUNT: \$3750.00

VOID AFTER 6 MONTHS  
KUTAK ROCK

By: *Kathryn A. Kidwell*

377566

Invoice No.	Date	Description	Payment	Check No.
081997	08/19/97	late submission fees	3750.00	377566

kak/3295

91043041475



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4664

DATE FILMED 10-6-97 CAMERA NO. 1

CAMERAMAN JmU

97043841476



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

Date: 5/4/98

           Microfilm

           Press

THE ATTACHED MATERIAL IS BEING ADDED TO CLOSED NUR 4664

190040000340

**KULTARK PRODUK**  
A CORPORATION  
INCLUDING PROFESSIONAL CORPORATION  
SUITE 1000  
1101 CONNECTICUT AVENUE N.W.  
WASHINGTON D.C. 20006-4714  
202-888-2600  
FACSIMILE 202-888-2688  
HTTP://WWW.KULTARK.COM

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
Aug 21 11 52 AM '97

ATLANTA  
DENVER  
KANSAS CITY  
LITTLE ROCK  
NEW YORK  
NEWPORT BEACH  
OKLAHOMA CITY  
OSAMA  
PHOENIX  
PITTSBURGH

August 19, 1997

Tracy Ligon, Esquire  
Federal Election Commission  
Office of General Counsel  
6th Floor  
999 E Street, N.W.  
Washington, DC 20463

Aug 19 2 07 PM '97

FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

Dear Ms. Ligon:

As we discussed, enclosed please find Kultark's **Conciliation Agreement**, along with a check in the amount of \$3,750.00.

I appreciate your assistance with this matter. If you have any questions, please do not hesitate to contact me at (202) 888-2492.

Sincerely,  
  
Kathryn A. Kishwell  
Administrative Manager

Enclosure

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
ACCOUNTING UNIT  
Aug 20 10 23 AM '97

9 6 0 4 0 3 0 0 5 4 1

**KUTAK ROCK**

SUITE 1000  
1101 CONNECTICUT AVE., N.W.  
WASHINGTON, DC 20038-4374

NATIONSBANK OF DC, N.A.  
WASHINGTON, DC  
18-120640

377566

TO THE ORDER OF	<b>PAY</b>	<b>DATE</b>	<b>AMOUNT</b>
	THE SUM 3750 DOLLARS AND 00 CENTS*****	August 19, 1997	\$3750.00
	Federal Election Commission 999 E. Street, NW 6th Floor Washington, D.C. 20463		

VOID AFTER 6 MONTHS  
KUTAK ROCK

By: *Kathryn A. Kidwell*

999999

⑆377566⑆ ⑆05400⑆204⑆ 330099 ⑆

377566

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Invoice No.	Date	Description	Payment	Check No. 377566
081997	08/19/97	late submission fees	3750.00	

999999	5560006/03	kak/3295
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KUTAK ROCK



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

FEDERAL ELECTION COMMISSION

AUG 21 11 52 AM '97

August 21, 1997

**TWO WAY MEMORANDUM**

TO: OGC Docket  
FROM: Leslie D. Brown  
Disbursing Technician  
SUBJECT: Account Determination for Funds Received

We recently received a check from **Kutak Rock Political Action Committee**, check number **377566**, dated **August 19, 1997**, for the amount of **\$3,750.00**. A copy of the check and any correspondence is being forwarded. Please indicate below which account the funds should be deposited and give the MUR/Case number and name associated with the deposit.

=====

TO: Rosa E. Swinton *RS*                      Leslie D. Brown  
Accounting Technician                      Disbursing Technician  
FROM: OGC Docket  
SUBJECT: Disposition of Funds Received

In reference to the above check in the amount of \$3,750.00, the MUR/Case number is 4664 and in the name of Kutak Rock Political Action Committee. Place this deposit in the account indicated below:

- Budget Clearing Account (OGC), 95F3875.16
- Civil Penalties Account, 95-1099.160
- Other: \_\_\_\_\_

Frankie Hampton  
Signature

August 22, 1997  
Date

7004000043