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OFFICE OF GENERAL
COUNSEL

2006 OCT 13 P 2:35

October 9, 2006

Mr. Larry Norton, General Counsel
Federal Election Commission
999 E Street NW
Washington, DC 20463

MUR # 5844

Dear Mr. Norton,

The purpose of this correspondence is to report a violation of section 441 of Federal Election Campaign Law by Nevada Congressman Jim Gibbons, currently a candidate for governor of Nevada. Specifically, the violation relates to sections 441i, 441b and 441a, prohibiting state PACs affiliated with federal officeholders from accepting corporate donations. This is a revised submittal per your instructions of a packet previously submitted on September 21, 2006. A copy of your letter of instruction is attached.

As you are aware, the McCain-Feingold Campaign Finance Reform Act of 2002 prohibited state political action committees affiliated with federal officeholders from accepting corporate donations as of November 5, 2002. Section 441i reads as follows:

(e) Federal candidates.

(1) *In general.* A candidate, individual holding Federal office, agent of a candidate or an individual holding Federal office, or an entity directly or indirectly established, financed, maintained or controlled by or acting on behalf of 1 or more candidates or individuals holding Federal office, shall not—

(A) solicit, receive, direct, transfer, or spend funds in connection with an election for Federal office, including funds for any Federal election activity, unless the funds are subject to the limitations, prohibitions, and reporting requirements of this Act; or

(B) solicit, receive, direct, transfer, or spend funds in connection with any election other than an election for Federal office or disburse funds in connection with such an election unless the funds—

(i) are not in excess of the amounts permitted with respect to contributions to candidates and political committees under paragraphs (1), (2), and (3) of section 315(a) (2 U.S.C. § 441a(a)); and

(ii) are not from sources prohibited by this Act from making contributions in connection with an election for Federal office.

Public records indicate that the Silver State Leadership PAC, created by sitting Congressman Jim Gibbons on September 25, 2002, accepted the following corporate contributions, as defined in section 441b:

- The Walters Group, \$2,000, Nov. 11, 2004
- Cal Neva Resort, \$2,000, Sept. 30, 2003
- Newmont Mining Corp., \$10,000, Nov. 8, 2002
- Placer Dome America, \$2,500, Nov. 8, 2002

Southern Office

Phone (702) 369-0074
Fax (702) 369-1170
4225 S Eastern Avenue, Ste. 8
Las Vegas, NV 89119
PO Box 72306
Las Vegas, NV 89170

Northern Office

Phone (775) 323-2006
Fax (775) 323-2014
333 Flint Street
Reno, NV 89509

27044162966

These contributions were accepted after the effective date of McCain-Feingold and constitute a clear violation of the law. A fifth contribution, of \$5,000 from Management Technology (Jan. 24, 2003) may also constitute a corporate contribution under the law.

In addition, the \$10,000 contribution from Newmont Mining exceeds the legal limit of \$5,000 on contributions to political committees, as defined in section 441a.

We request that your office begin an investigation of these violations immediately. When considering these instances of Federal violations, we believe it is worth noting that Congressman Gibbons also has a history of violating Nevada's campaign finance law, NRS 294A.100. The congressman recently admitted that two contributions to his current gubernatorial campaign exceeded the limits set by Nevada statutes. In addition, during his failed 1994 bid for governor, he was found to have violated the same law eleven times. In these instances, Gibbons brushed off the violations as mistakes or misunderstandings – however, he has shown a clear pattern of disregard for campaign finance law, first at the state and now at the Federal level.

We believe that swift action from your office would send a clear message regarding the seriousness of these violations. Excuses should not be tolerated when elected officials violate the public trust.

I have attached for your reference copies of the records in question, as reported by the Silver State Leadership PAC and publicly posted on the Nevada Secretary of State's website. Registration documents for the Silver State Leadership Fund PAC listing James A. Gibbons as chairman are also included for your reference.

I trust that you will expedite investigation of this matter. Please feel free to contact me with any questions you may have.

Sincerely,

Bill Romjue
Bill Romjue
Campaign Manager

Attachments

Subscribed and sworn to before me on this 11 day of October, 2006.

Lori E. Howlett
Notary



27044162967

Committee for Political Action (PAC) Registration Form

State of Nevada

PAC # 595

FILE
SEP 30 2002
DEAN HELLER
SECRETARY OF STATE

Print or type the following information; complete both sides of this registration form:

REGISTRATION: (check one) ☒ New registration ☐ Amended registration (if amended list reason)

REASON FOR AMENDMENT: ☒ Change in officers ☐ Change resident agent
☐ Other

NAME OF COMMITTEE:

Silver State Leadership Fund

Mailing Address:

542 1/2 Plumas Street

Reno NV 89509
City State Zip

Telephone Number: (775) 322-4322 Facsimile Number: (775) 322-3441

Email Address: silverstate@yahoo.com Website Address:

PURPOSE: (Briefly state the purpose for which the political action committee was organized.)
To maintain strong political leadership in Nevada.

RESIDENT AGENT: (Pursuant to NRS 294A.260, each committee for political action must appoint and keep in this state a resident agent who must be a natural person who resides in the State of Nevada.)

Name of Resident Agent: Linda K. Potter

Mailing Address: 542 1/2 Plumas Street

Reno NV 89509
City State Zip

Telephone Number: (775) 322-4322 Facsimile Number: (775) 322-3441

Email Address: silverstate@yahoo.com Website Address:

ACCEPTANCE OF APPOINTMENT BY RESIDENT AGENT

I, Linda K. Potter, hereby accept appointment as Resident Agent for the
above named committee for political action.

Linda K. Potter
Signature of Resident Agent

September 25, 2002
Date

27044162968

Committee for Political Action (PAC) Registration Form

State of Nevada

Print or type the following information; complete both sides of this registration form:

REGISTRATION: (check one) ☐ New registration ☒ Amended registration (if amended list reason)REASON FOR AMENDMENT: ☐ Change in officers ☐ Change resident agent☒ Other Silver was spelled wrong

NAME OF COMMITTEE:

Mailing Address:

Silver State Leadership Fund

City

State

Zip

Telephone Number:

Facsimile Number:

Email Address:

Website Address:

PURPOSE: (Briefly state the purpose for which the political action committee was organized.)

RESIDENT AGENT: (Pursuant to NRS 294A.260, each committee for political action must appoint and keep in this state a resident agent who must be a natural person who resides in the State of Nevada.)

Name of Resident Agent:

Mailing Address:

City

State

Zip

Telephone Number:

Facsimile Number:

Email Address:

Website Address:

ACCEPTANCE OF APPOINTMENT BY RESIDENT AGENT

I, _____, hereby accept appointment as Resident Agent for the
above named committee for political action.

Signature of Resident Agent

Date

PAC #505

FILE
SEP 26 2002DEAN HELLER
SECRETARY OF STATE

27044162969

Committee for Political Action (PAC) Registration Form

State of Nevada

PAC # 545

Print or type the following information; complete both sides of this registration form:

REGISTRATION: (check one) ☒ New registration ☐ Amended registration (if amended list reason)REASON FOR AMENDMENT: ☒ Change in officers ☐ Change resident agent☐ Other

Silver

NAME OF COMMITTEE:

Silver State Leadership Fund

Mailing Address:

542 1/2 Plumas Street

Reno

NV

89509

City

State

Zip

Telephone Number: (775) 322-4322 Facsimile Number: (775) 322-3441

Email Address: silverstate@yahoo.com Website Address:

PURPOSE: (Briefly state the purpose for which the political action committee was organized.)

To maintain strong political leadership in Nevada.

RESIDENT AGENT: (Pursuant to NRS 294A.260, each committee for political action must appoint and keep in this state a resident agent who must be a natural person who resides in the State of Nevada.)

Name of Resident Agent:

Linda K. Potter

Mailing Address:

542 1/2 Plumas Street

Reno

NV

89509

City

State

Zip

Telephone Number: (775) 322-4322 Facsimile Number: (775) 322-3441

Email Address: silverstate@yahoo.com Website Address:

ACCEPTANCE OF APPOINTMENT BY RESIDENT AGENT

I, Linda K. Potter, hereby accept appointment as Resident Agent for the above named committee for political action.

Linda K. Potter
Signature of Resident Agent

September 25, 2002
Date

97A

27044162970

FILE 34
SEP 25 2002
DEPT. OF STATE

OFFICERS:

(Please list the name, title and address of each officer.)

Name	James A. Gibbons	Address	542½ Plumas Street
Title		City/State/Zip	Reno NV 89509
Name		Address	
Title		City/State/Zip	
Name		Address	
Title		City/State/Zip	
Name		Address	
Title		City/State/Zip	
Name		Address	
Title		City/State/Zip	

AFFILIATION: (If the committee for political action is affiliated with any other organizations, list the name and address of each organization.)

Name of Organization:

Address:

Submitted By:

Linda K. Potter

Name of representative of group

September 25, 2002

Date

Send Completed Form to:

SECRETARY OF STATE

101 NORTH CARSON STREET #3

CARSON CITY, NEVADA 89701-4786

PHONE: (775) 684-5705 FAX: (775) 684-5718

Committee for Political Action
(PAC) Registration Form

978 FILE

FEB 22 2006

State of Nevada HELLER
SECRETARY OF STATE

Print or type the following information; complete both sides of this registration form:

REGISTRATION: (check one) ☐ New registration ☒ Amended registration (if amended, list reason)

REASON FOR AMENDMENT: ☒ Change in officers ☒ Change resident agent
☐ Other _____

NAME OF COMMITTEE: Silver State Leadership Fund
Mailing Address: 6502 S. McCarran Blvd., Suite D
Reno, NV 89509 (775) 823-3777
City State Zip Telephone

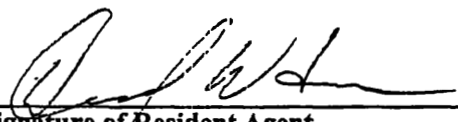
PURPOSE: (Briefly state the purpose for which the political action committee was organized.)

RESIDENT AGENT: (Pursuant to NRS 294A.240, each committee for political action must appoint and keep in this state a resident agent who must be a natural person who resides in the State of Nevada.)

Name of Resident Agent: David W. Turner
Mailing Address: 6502 S. McCarran Blvd., Suite D
Reno, NV 89509 (775) 823-3777
City State Zip Telephone

ACCEPTANCE OF APPOINTMENT BY RESIDENT AGENT

I, David W. Turner, hereby accept appointment as Resident Agent for the
above named committee for political action.



Signature of Resident Agent

02/16/06

Date

27044162972

OFFICERS:

(Please list the name, title, address and telephone number of each officer)

James A. GibbonsNameChairmanTitle Telephone NumberDavid W. TurnerNameTreasurerTitle Telephone NumberAddressReno, NV 89511City/State/Zip6502 S. McCarran Blvd., Ste. DAddressReno, NV 89509City/State/ZipRobert VithovenNameVice ChairmanTitle Telephone NumberAddressReno, NV 89511City/State/ZipNameAddressTitle Telephone NumberCity/State/ZipNameAddressTitle Telephone NumberCity/State/Zip**AFFILIATIONS:** (If the committee for political action is affiliated with any other organizations, list the name, address and telephone number of each organization.)**Name of Organization:****Address:****Telephone No.:****Submitted By:**David W. TurnerName of representative of groupFebruary 16, 2006Date

Send Completed Form to:
SECRETARY OF STATE
101 NORTH CARSON STREET #3
CARSON CITY, NEVADA 89701-4786

PHONE: (775) 684-5705 FAX: (775) 684-5718

27044162973

CAMPAIGN CONTRIBUTIONS AND EXPENSES REPORT

State of Nevada

Silver State Leadership Fund

Name (print)

P.O. BOX 7357

Office (if applicable)

Reno NV 89510

District (if applicable)

675
378-0342

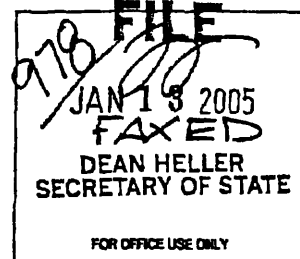
Mailing Address (include city and zip code)

Telephone No

E-Mail Address

Select Appropriate Box(es) ☐ CANDIDATE ☒ PAC ☐ BAG ☐ POL PRY ☐ IND EXP ☐ AMENDED ☐ ANNUAL FILING☐ Annual Filing - Due January 15, 2004
Period: January 1, 2003 - December 31, 2003☐ Report #1 - Due August 31, 2004
Incumbents in an Office with a 4-year term Period: Jan. 5, 2001 - Aug 26, 2004
Incumbents in an Office with a 6-year term Period: Dec. 20, 1998 - Aug 26, 2004
All others Period: Jan. 1, 2004 - Aug 26, 2004
Ballot Advocacy Groups (BAGs) only: Period: Dec. 5, 2002 - Aug 26, 2004☐ Report #2 Due - October 26, 2004
Period: Aug 27, 2004 - Oct. 21, 2004☒ Report #3 Due - January 15, 2005*
Period: Oct. 22, 2004 - Dec. 31, 2004
BAGs only Period: Oct. 22, 2004 - Dec. 5, 2004☐ Annual Filing - Due January 15, 2005
Period: January 1, 2004 - December 31, 2004

* Third Report suffices for 2005 Annual Filing if candidate also filed Report Nos. 1 and 2



CONTRIBUTIONS SUMMARY

- 1 Total Monetary Contributions Received in Excess of \$100
- 2 Total Monetary Contributions Received of \$100 or Less

This Period

8000.-	Cumulative From Beginning of Report Period #1 through End of This Reporting Period
0	20000.00
	85.00

- 3 Total Amount of Monetary Contributions Received
(Add Lines 1 and 2)
- 4 Total Value of In Kind Contributions Received in Excess of \$100

This Period

Cumulative From Beginning of Report Period #1 Through End of This Reporting Period

8000.00	20085.00
0	0

EXPENSES SUMMARY

- 5 Total Monetary Expenses Paid in Excess of \$100
- 6 Total Monetary Expenses Paid of \$100 or Less
- 7 Total Amount of All Monetary Expenses Paid
(Add Lines 5 and 6)
- 8 Total Value of In Kind Expenses in Excess of \$100

1500.00	14109.16
66.00	346.00
1566.00	14455.16

0	0
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AFFIRMATION

I Declare Under Penalty of Perjury That the Foregoing is True and Correct.

Signature

1/13/05

Date

EL201.doc

Revised: Jan-04

PAGE 1 OF 3

2704416297A

CAMPAIGN EXPENSES

Report Period: #

Name (print)

Office (if applicable)

District (if applicable)

Expenses in Excess of \$100

Transfer Total Amount of All Campaign Expenses to Line 5 of Expense Summary

[illegible]

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2002 CAMPAIGN CONTRIBUTIONS AND EXPENSES

State of Nevada

Silver State Leadership Fund

Name (print)

Office (if applicable)

District (if applicable)

542 1/2 Plumas St. Reno NV 89509 775 322-4322

Mailing Address (include city and zip code)

Telephone No

E-Mail Address

3 PAC 595

☐ Appropriate Boxes ☐ CANDIDATE ☐ PAC ☐ BAG ☐ POL/PTY ☐ IND EXP ☐ AMENDED
☐

Report #1 — Due August 27, 2002

Office with a 2-year term Period: Jan. 5, 2001 — Aug. 22, 2002

Office with a 4-year term Period: Dec. 20, 1998 — Aug. 22, 2002

Office with a 6-year term Period: Dec. 6, 1996 — Aug. 22, 2002

BAGs only: Period: Dec. 7, 2000 — Aug. 22, 2002

☐

Report #2 Due — October 29, 2002

Period: Aug. 23, 2002 — Oct. 24, 2002

☐

Report #3 Due — January 15, 2003

Period: Oct. 25, 2002 — Jan. 3, 2003

BAGs only: Period: Oct. 25, 2002 — Dec. 5, 2002

FILED

JAN 15 2003

Secretary of State

FOR OFFICE USE ONLY

BALANCE

This figure should reflect the balance shown on your last Disposition of Unspent Contributions Report, or last Contributions & Expenses Report, if any

5,000.00

CONTRIBUTIONS SUMMARY

"Contribution" means a gift, loan, conveyance, deposit, payment, transfer or distribution of money or anything of value other than the services of a volunteer received. (NRS 294A.007)

1. Total amount of monetary contributions in excess of \$100

18,500.00

2. Total amount of monetary contributions of \$100 or less

Actual number of monetary contributions of \$100 or less

3. Interest and income earned on contributions, if any

14.42

4. TOTAL AMOUNT OF ALL MONETARY CONTRIBUTIONS (add lines 1 through 3)

18514.42

5. Total amount of In Kind Contributions

EXPENSES SUMMARY

6. Total amount of monetary expenses in excess of \$100

2939.14

7. Total amount of monetary expenses of \$100 or less

178.62

8. Expense for filing fee

9. TOTAL AMOUNT OF ALL MONETARY EXPENSES (add lines 6 through 8)

3117.76

Remaining Balance (Subtract line 9 from 4)

15,396.66

10. Total amount of In Kind Expenses

AFFIRMATION

I declare under penalty of perjury that the foregoing is true and correct.

Signature

Date Executed On

EL201.doc

Revised, MAR-02

PAGE 1 OF 4

27044162977

CAMPAIGN CONTRIBUTIONS	Report Period	#
------------------------	---------------	---

Silver State Leadership Fund

Name (print)

Office (if applicable)

District (if applicable)

Contributions in Excess of \$100 or, When Added Together from One Contributor Exceeds \$100

CONTRIBUTOR'S NAME AND ADDRESS	DATE OF EACH CONTRIBUTION	AMOUNT OF EACH CONTRIBUTION	CHECK OR IF LOAN
John B. Conaway P.O. Box 3008 Alexandria VA 22302	10-29-02	500.00	
The Furman Group 1401 K Street NW St. 450 Washington DC 20005	10-29-02	1000.00	
Newmont Mining Corp 1700 Lincoln St. Denver Co 80203	11-8-02	10,000.00	
Placer Dome America 1125 Seventeenth St Suite #2310 Denver Co 80202	11-8-02	2500.00	
Charles P Bluth P.O. Box 5830 Incline Village NV 89450	11-8-02	2000.00	
Howard Wells Las Vegas NV 89107	11-8-02	2000.00	
Pinnacle West 801 Pennsylvania Avenue NW Suite 214 Washington DC 20004	11-19-02	500.00	
		18,500.00	

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CAMPAIGN EXPENSES

Report Period #

Name (print)

Office (if applicable)

District (if applicable)

Expenses In Excess of \$100

NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO RECEIVED THE PAYMENT FOR THE EXPENSE(S)	CATEGORY <small>(See Instructions, Page 1)</small> NONE, OTHER	DATE OF EACH EXPENSE	AMOUNT OF EACH EXPENSE
DTI2E Studios 2475 Robb Dr # 1023 Reno NV 89523	D	10/29/02	300.00
Linda Potter Reno NV 89509	F	11/15/02	1200.00
First USA Bank	A	11/27/02	1439.14
			2939.14

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DATE	DESCRIPTION	AMOUNT	BALANCE	REMARKS
12/1/20
12/2/20
12/3/20
12/4/20
12/5/20
12/6/20
12/7/20
12/8/20
12/9/20
12/10/20
12/11/20
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12/25/20
12/26/20
12/27/20
12/28/20
12/29/20
12/30/20
12/31/20

Name (print)

Office (if applicable)

Distinct (if applicable)

Expenses of \$100 or Less

[illegible][illegible]

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CAMPAIGN CONTRIBUTIONS AND EXPENSES REPORT

State of Nevada

SILVER STATE LEADERSHIP FUNDN/A

Name (print)

Office (if applicable)

District (if applicable)

P.O. Box 7357 RENO NV 89510829-7886

Mailing Address (include city and zip code)

Telephone No

E-Mail Address

Select Appropriate Box(es) ☐ CANDIDATE ☒ PAC ☐ BAG ☐ POL PRTY ☐ IND EXP ☐ AMENDED ☒ ANNUAL FILING☒ Annual Filing - Due January 15, 2004
Period January 1, 2003 - December 31, 2003☐ Report #1 - Due August 31, 2004Incumbents in an Office with a 4-year term Period Jan 5, 2001 - Aug 26, 2004
Incumbents in an Office with a 6-year term Period Dec 20, 1996 - Aug 26, 2004
All others Period Jan 1, 2004 - Aug 26, 2004
Ballot Advocacy Groups (BAGs) only Period Dec 5, 2002 - Aug 26, 2004☐ Report #2 Due - October 26, 2004

Period Aug 27, 2004 - Oct 21, 2004

☐ Report #3 Due - January 15, 2005*

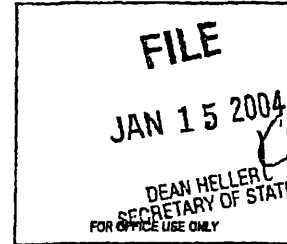
Period Oct 22, 2004 - Dec 31, 2004

BAGs only: Period Oct 22, 2004 - Dec 5, 2004

☐ Annual Filing - Due January 15, 2005

Period January 1, 2004 - December 31, 2004

* Third Report suffices for 2005 Annual Filing if candidate also filed Report Nos. 1 and 2



AN PAC 595.

CONTRIBUTIONS SUMMARY

1. Total Monetary Contributions Received in Excess of \$100
2. Total Monetary Contributions Received of \$100 or Less

This Period

Cumulative
From Beginning
of Report Period
#1 through End
of This
Reporting
Period

18831

85

2380

00

This Period

Cumulative From
Beginning of
Report Period #1
Through End of
This Reporting
Period

3. Total Amount of Monetary Contributions Received (Add Lines 1 and 2)
4. Total Value of In Kind Contributions Received in Excess of \$100

0

0

21211

85

EXPENSES SUMMARY

5. Total Monetary Expenses Paid in Excess of \$100
6. Total Monetary Expenses Paid of \$100 or Less
7. Total Amount of All Monetary Expenses Paid (Add Lines 5 and 6)
8. Total Value of In Kind Expenses in Excess of \$100

0

14600

38

194

25

14794

63

AFFIRMATION

I Declare Under Penalty of Perjury That the Foregoing is True and Correct.

Linda Potter

Signature

1/15/04

Date

EL201.doc

Revised Jan-04

PAGE 1 OF 6

27044162981

CAMPAIGN CONTRIBUTIONS

Report Period #

SILVER STATE LEADERSHIP FUND N/A
 Name (print) Office (if applicable) District (if applicable)

Contributions in Excess of \$100 or, When Added Together from One Contributor Exceeds \$100
 Transfer Total Amount of All Campaign Contributions to Line 1 of Contributions Summary

CONTRIBUTOR'S NAME AND ADDRESS	DATE OF EACH CONTRIBUTION	AMOUNT OF EACH CONTRIBUTION	CHECK HERE IF LOAN
John Flanigan RENO NV 89511	11/14/03	250.00	
HERRMANN GLOCKER RENO NV 89509	10/21/03	250.00	
SEUNG PARK 4252 DANT BLVD RENO NV 89509	10/21/03	250.00	
DEBORAH DAV RENO NV 89501	10/21/03	2000.00	
THEODORE DAV RENO NV 89501	10/21/03	2000.00	
Nat Carasali RENO NV 89509	10/21/03	1081.85	
CAINEVA RESORT PO BOX 368 CRISTAL BAY NV 89402	9/30/03	2000.00	
Jack Fegely	9/18/03	250.00	
Aurelia Roberts Las Vegas NV 89107	8/28/03	2000.00	
LIONEL SAWYER & Collins PAC 300 S. 4TH STE. 1700 Las Vegas NV 89101	8/19/03	500.00	
Rod Smallwood INCLINE Valley NV	7/17/03	500.00	
J.K. Houssels Las Vegas NV 89146	7/17/03	500.00	
John O'Reilly Las Vegas NV 89101	7/17/03	1000.00	
LES THRASHER Las Vegas NV 89134	7/17/03	1000.00	
Ron Williams PO BOX 3616 GRAND CANYON AZ 86003	7/17/03	250.00	
MANAGEMENT TECHNOLOGY	11/24/03	5000.00	

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27044152982

CAMPAIGN EXPENSES

Report Period #

SILVER STATE LEADERSHIP FUND

Name (print)

Office (if applicable)

District (if applicable)

Expense Categories

CATEGORIES	CODE
Office expenses	A
Expenses related to volunteers	B
Expenses related to travel	C
Expenses related to advertising	D
Expenses related to paid staff	E
Expenses related to consultants	F
Expenses related to polling	G
Expenses related to special events	H
** Goods and services provided in kind for which money would otherwise have been paid	I
Other miscellaneous expenses	J
Expenses related to NRS 294A.160 (Disposition of Unspent Contributions)	K

**** NRS 294A.362 requires "In Kind" contributions and expenses to be reported on a separate form, which is attached.**

27044162983

CAMPAIGN EXPENSES

Report Period #

Silver State Leadership Fund

Name (print)

Office (if applicable)

District (if applicable)

Expenses in Excess of \$100

Transfer Total Amount of All Campaign Expenses to Line 5 of Expenses Summary

NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO RECEIVED THE PAYMENT FOR THE EXPENSE(S)	CATEGORY (See Previous Page) NRS 294A 365	DATE OF EACH EXPENSE	AMOUNT OF EACH EXPENSE
Great Basin RENO NV 89511	A	1/03 to 5/03	150.00
NU STATE BANK 1 W. LIBERTY RENO NV 89509	A	9/03 to 11/03	138.76
LINDA POTTER RENO NV 89509	E	ONCE A MONTH For 9 months	7200.00
YOUNG REPUBLICANS UNR	J	6/12/03	2000.00
Post Office MAIN	A	6/19/03 9/26/03	2178.40
FRIENDS OF ROBERT LARKIN 1285 Baring Blvd #194 Sparks	J	9/18/03	1000.00
DTIZE Studios 2475 Robb Dr #1023 RENO NV 89523	A	11/28/03	1933.22

01/03 to
09/03

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27044162984

IN KIND CAMPAIGN
EXPENSES

Report Period #

SILVER STATE LEADERSHIP FUND

Name (print)

Office (if applicable)

District (if applicable)

IN KIND

Expenses in Excess of \$100

Transfer Total Value of All In-Kind Campaign Expenses to Line 8 of Expenses Summary

NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO RECEIVED THE IN KIND GOOD(S) OR SERVICE(S)	DESCRIPTION OF EACH IN KIND EXPENSE	DATE OF EACH IN KIND EXPENSE	VALUE OR COST OF EACH IN KIND EXPENSE
⊖			

This page may be copied or duplicated if additional space is needed.

Fact Sheet on Silver State Leadership Fund Violations

The Law:

Federal Election Campaign Laws

Source: Federal Election Commission

§ 441i

(e) *Federal candidates.*

(1) *In general.* A candidate, individual holding Federal office, agent of a candidate or an individual holding Federal office, or an entity directly or indirectly established, financed, maintained or controlled by or acting on behalf of 1 or more candidates or individuals holding Federal office, shall not—

(A) solicit, receive, direct, transfer, or spend funds in connection with an election for Federal office, including funds for any Federal election activity, unless the funds are subject to the limitations, prohibitions, and reporting requirements of this Act; or

(B) solicit, receive, direct, transfer, or spend funds in connection with any election other than an election for Federal office or disburse funds in connection with such an election unless the funds—

(i) are not in excess of the amounts permitted with respect to contributions to candidates and political committees under paragraphs (1), (2), and (3) of section 315(a) (2 U.S.C. § 441a(a)); and (ii) are not from sources prohibited by this Act from making contributions in connection with an election for Federal office.

§ 441b. Contributions or expenditures by national banks, corporations, or labor organizations

(a) It is unlawful for any national bank, or any corporation organized by authority of any law of Congress, to make a contribution or expenditure in connection with any election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for any political office, or for any corporation whatever, or any labor organization, to make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or Representative in, or a Delegate or Resident Commissioner to, Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices, or for any candidate, political committee, or other person knowingly to accept or receive any contribution prohibited by this section, or any officer or any director of any corporation or any national bank or any officer of any labor organization to consent to any contribution or expenditure by the corporation, national bank, or labor organization, as the case may be, prohibited by this section.

§ 441a. Limitations, contributions, and expenditures

(a) *Dollar limits on contributions.*

(1) Except as provided in subsection (i) and section 315A (2 U.S.C. § 441a-1), no person shall make contributions—

(A) to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$2,000;

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- (B) to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, in any calendar year which, in the aggregate, exceed \$25,000,
- (C) to any other political committee (other than a committee described in subparagraph (D)) in any calendar year which, in the aggregate, exceed \$5,000; or
- (D) to a political committee established and maintained by a State committee of a political party in any calendar year which, in the aggregate, exceed \$10,000.

The Violations

State PACs affiliated with federal officeholders were prohibited as of November 6, 2002 from accepting corporate donations, under the McCain-Feingold Campaign Finance Reform Act of 2002. After Nov. 6, 2002, Silver State Leadership Fund, organized by Congressman Jim Gibbons on September 25, 2002, took the following corporate contributions: The Walters Group, \$2,000, Nov. 11, 2004; Cal Neva Resort, \$2,000, Sept. 30, 2003; Newmont Mining Corp., \$10,000, Nov. 8, 2002; Placer Dome America, \$2,500, Nov. 8, 2002; In addition, the \$10,000 contribution from Newmont Mining exceeded the \$5,000 limit on contributions to political committees.

CAMPAIGN CONTRIBUTIONS

Report Period **#3**

Silver State Leadership Fund

Name (print)

Office (if applicable)

District (if applicable)

Contributions in Excess of \$100 or, When Added Together from One Contributor Exceeds \$100
Transfer Total Amount of All Campaign Contributions to Line 1 of Contributions Summary

CONTRIBUTOR'S NAME AND ADDRESS	DATE OF EACH CONTRIBUTION	AMOUNT OF EACH CONTRIBUTION	CHECK HERE IF LOAN
The Walters Group 5500 Flamingo Road Las Vegas NV 89122	11/11/04	2,000.00	
Gibbons for Nevada 542 1/2 Plumas Street Reno NV 89502	11/2/04	5,000.00	
Monte Greenawalt, Las Vegas NV 89113	11/2/04	1,000.00	

CAMPAIGN CONTRIBUTIONS

Report Period #

SILVER STATE LEADERSHIP FUND N/A
 Name (print) Office (if applicable) District (if applicable)

Contributions in Excess of \$100 or, When Added Together from One Contributor Exceeds \$100
 Transfer Total Amount of All Campaign Contributions to Line 1 of Contributions Summary

CONTRIBUTOR'S NAME AND ADDRESS	DATE OF EACH CONTRIBUTION	AMOUNT OF EACH CONTRIBUTION	CHECK HERE IF LOAN
JOHN FLANIGAN RENO NV 89511 HERRMANN GLOCKER	11/14/03	250.00	
RENO NV 89504 SEUNG PARK 4252 DANT BLVD RENO NV 89509	10/21/03	250.00	
DEBORAH DAY RENO NV 89501 THEODORE DAY	10/21/03	2000.00	
RENO NV 89501 Nat Carasali -	10/21/03	2000.00	
RENO NV 89509 CAINEVA RESORT P O Box 368 CRISTAL BAY NV 89402	10/21/03	1081.85	
JACK Fegely	9/30/03	2000.00	
Aurelia Roberts Las Vegas NV 89107	9/18/03	250.00	
LIONEL SAWYER + Collins PAC 300 S. 4TH STE. 1700 Las Vegas NV 89101	8/28/03	2000.00	
Rod Smallwood INCLINE Valley NV	8/19/03	500.00	
J.K. Houssels Las Vegas NV 89146	7/17/03	500.00	
JOHN O'REILLY 325 S Maryland PKWY STE 1 Las Vegas NV 89101	7/17/03	500.00	
LES THRASHER Las Vegas NV 89134	7/17/03	1000.00	
RON Williams P.O. Box 3616 Grand CANYON AZ 86003	7/17/03	1000.00	
MANAGEMENT TECHNOLOGY	11/24/03	250.00	
		5000.00	

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CAMPAIGN CONTRIBUTIONS	REPORT PERIOD #
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Silver State Leadership Fund

Name (print)

Office (if applicable)

District (if applicable)

Contributions in Excess of \$100 or, When Added Together from One Contributor Exceeds \$100

CONTRIBUTOR'S NAME AND ADDRESS	DATE OF EACH CONTRIBUTION	AMOUNT OF EACH CONTRIBUTION	CHECK HERE IF LOAN
John B. Conaway P.O. Box 3008 Alexandria VA 22302	10-29-02	500.00	
The Furman Group 1401 K Street NW St. 450 Washington DC 20005	10-29-02	1000.00	
Newmont Mining Corp 1700 Lincoln St. Denver Co 80203	11-8-02	10,000.00	
Placer Dome America 1125 Seventeenth St Suite #2310 Denver CO 80202	11-8-02	2500.00	
Charles P Bluth P.O. Box 5830 Incline Village NV 89450	11-8-02	2000.00	
Howard Wells Las Vegas NV 89107	11-8-02	2000.00	
Pinnacle West 801 Pennsylvania Ave NW Suite 214 Washington DC 20004	11-19-02	500.00	

OFFICERS:

(Please list the name, title and address of each officer)

Name James A. Gibbons

Address 542½ Plumas Street

Title

City/State/Zip
Reno NV 89509

Name

Address

Title

City/State/Zip

Name

Address

Title

City/State/Zip

Name

Address

Title

City/State/Zip

Name

Address

Title

City/State/Zip

AFFILIATION: (If the committee for political action is affiliated with any other organizations, list the name and address of each organization)

Name of Organization:

Address:

Submitted By:

Linda K. Potter

September 25, 2002

Name of representative of group

Date

Send Completed Form to:

SECRETARY OF STATE

101 NORTH CARSON STREET #3

CARSON CITY, NEVADA 89701-4786

PHONE: (775) 684-5705 FAX: (775) 684-5718