



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 1, 2001

MEMORANDUM

TO: RON M. HARRIS
PRESS OFFICER
PRESS OFFICE

FROM: ROBERT J. COSTA *RJC*
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: PUBLIC ISSUANCE OF THE FINAL AUDIT REPORT ON
THE NORTH CAROLINA REPUBLICAN EXECUTIVE COMMITTEE

Attached please find a copy of the final audit report and related documents on the North Carolina Republican Executive Committee which was approved by the Commission on January 19, 2001.

Informational copies of the report have been received by all parties involved and the report may be released to the public on February 1, 2001.

Attachment as stated

cc: Office of General Counsel
Office of Public Disclosure
Reports Analysis Division
FEC Library

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22.07.025.2753

REPORT OF THE AUDIT DIVISION
ON THE
***NORTH CAROLINA REPUBLICAN
EXECUTIVE COMMITTEE***

Approved January 19, 2001



FEDERAL ELECTION COMMISSION
999 E STREET, N.W.
WASHINGTON, D.C.

TABLE OF CONTENTS

NORTH CAROLINA REPUBLICAN EXECUTIVE COMMITTEE

	Page
Executive Summary	1
Final Audit Report	3
Background	3
Finding	5
Transmittal to Committee	13
Chronology	15

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

**REPORT OF THE AUDIT DIVISION
ON THE
NORTH CAROLINA REPUBLICAN EXECUTIVE COMMITTEE
EXECUTIVE SUMMARY**

The North Carolina Executive Committee (NCREC) registered with the Federal Election Commission (the Commission) on March 16, 1976, and maintains its headquarters in Raleigh, North Carolina. The Treasurers during the period covered by the audit were John Ruocchio, who served from January 1, 1997 through October 31, 1997, and Scott Lampe, who served from November 1, 1997 through July 14, 1999. The current Treasurer, Steven B. Long, began his tenure on July 15, 1999.

The audit was conducted pursuant to 2 U.S.C. §438(b), which states that the Commission may conduct audits of any political committee whose reports fail to meet the threshold level of compliance set by the Commission.

The finding arising from the audit was presented to representatives of NCREC at the completion of fieldwork on March 15, 2000 and later in the interim audit report. NCREC's response to the finding is contained in the audit report.

The following is an overview of the finding contained in the audit report.

RECEIPT OF CONTRIBUTIONS IN EXCESS OF THE LIMITATION - 2 U.S.C. Section 441a(a)(1)(c) and (2)(c). Funds received from two separate joint fundraising activities caused a total of \$133,166 in excessive contributions. In response to a inquiry by the Commission's Reports Analysis Division (RAD), NCREC acknowledged that \$104,250 of the funds from joint fundraising activities were in excess of the limit for the related contributors and transferred \$104,250 from its federal account to its non-federal account. The Commission's regulations at 11 CFR 103.3 specify that contributions deposited in the federal account that exceed the contribution limitations, and that are not otherwise resolved within 60 days must be returned to the contributor. At the time of NCREC's response to the RAD inquiry the 60 day period to resolve excessive contributions had passed. Notwithstanding the manner in which \$104,250 of the total excessive amount was resolved, there remained \$28,916 (\$133,166 - \$104,250) in unresolved excessive contributions. In response to the interim audit report, NCREC provided evidence that refunds of all but one (\$5,000) of the remaining, unresolved excessive contributions have been made.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

***REPORT OF THE AUDIT DIVISION
ON THE
NORTH CAROLINA REPUBLICAN EXECUTIVE COMMITTEE***

I. BACKGROUND

A. AUDIT AUTHORITY

This report is based on an audit of the North Carolina Republican Executive Committee (NCREC), undertaken by the Audit Division of the Federal Election Commission in accordance with the provisions of the Federal Election Campaign Act of 1971, as amended (the Act). The audit was conducted pursuant to Section 438(b) of Title 2 of the United States Code which states, in part, that the Commission may conduct audits and field investigations of any political committee required to file a report under section 434 of this title. Prior to conducting any audit under this subsection, the Commission shall perform an internal review of reports filed by selected committees to determine if the reports filed by a particular committee meet the threshold requirements for substantial compliance with the Act.

B. AUDIT COVERAGE

The audit covered the period from January 1, 1997, through December 31, 1998. During this period, NCREC reported a beginning cash balance of \$243; total receipts of \$2,498,634; total disbursements of \$2,490,231; and a closing cash balance of \$10,899¹.

C. COMMITTEE ORGANIZATION

NCREC registered with the Commission on March 16, 1976 and maintains its headquarters in Raleigh, North Carolina. The Treasurers during the period covered by the audit were John Ruocchio, who served from January 1, 1997 through October 31, 1997, and Scott Lampe, who served from November 1, 1997 through July 14, 1999. The current Treasurer, Steven B. Long, began his tenure on July 15, 1999.

¹ All figures in this report have been rounded to the nearest dollar. The amounts do not foot due to errors made when carrying forward ending cash on hand balances to subsequent reports.

To manage its federal financial activity, NCREC used 12 bank accounts. From these accounts NCREC made approximately 2800 disbursements. Receipts were composed of contributions from individuals (\$1,386,655); contributions from other political committees and transfers from affiliated and other party committees (\$550,253); loans received (\$33,500); offsets to operating expenditures received (\$28,503); interest income of \$72 and transfers from its non-federal accounts totaling \$495,071.²

During the audit period there were also eight non-federal accounts with total receipts of \$816,222 and disbursements that totaled \$821,863, and two building fund accounts which expended \$19,919.

D. AUDIT SCOPE AND PROCEDURES

The audit included testing of the following general categories:

1. The receipt of contributions or loans in excess of the statutory limitations (See Audit Finding and Recommendation);
2. the receipt of contributions from prohibited sources, such as those from corporations or labor organizations;
3. proper disclosure of contributions from individuals, political committees and other entities, to include the itemization of contributions when required, as well as, the completeness and accuracy of the information disclosed;
4. proper disclosure of disbursements including the itemization of disbursements when required, as well as, the completeness and accuracy of the information disclosed;
5. proper disclosure of debts and obligations;
6. the accuracy of total reported receipts, disbursements and cash balances as compared to bank records;
7. adequate recordkeeping for transactions;
8. proper disclosure of the allocation of costs associated with administrative expenses and activities conducted jointly on behalf of federal and non-federal elections and candidates ; and
9. other audit procedures that were deemed necessary in the situation.

² These categories of receipts total \$2,494,054 or about \$4,580 less than reported receipts (\$2,498,634).

Unless specifically discussed below, no material non-compliance with statutory or regulatory requirements was detected. Although it met the recordkeeping requirements under Section 432(c) of Title 2 of the United States Code, NCREC did not maintain documentation for expenditures (\$73,255) made to Campaign Tel, Ltd. for "advocacy calls", which would allow the Audit staff to determine if these services benefited any federal candidate(s). Documentation provided by NCREC indicated Campaign Tel is no longer in business. It should be noted that the Commission may pursue further any of the matters discussed in this report in an enforcement action.

II. AUDIT FINDING AND RECOMMENDATION

RECEIPT OF CONTRIBUTIONS IN EXCESS OF THE LIMITATION

Sections 441a(a)(1)(C) and (2)(C) of Title 2 of the United States Code state, that no person or multicandidate political committee shall make contributions to any other political committee in any calendar year which, in the aggregate, exceed \$5,000.

Sections 103.3(b)(3),(4), and (5) of Title 11 of the Code of Federal Regulations states, in part, that contributions which on their face exceed the contribution limitations set forth in 11 CFR §110.1 or 11 CFR §110.2, and contributions which do not appear to be excessive on their face, but which exceed the contribution limits set forth in 11 CFR §110.1 or 11 CFR §110.2 when aggregated with other contributions from the same contributor may be either deposited into a campaign depository under 11 CFR §103.3(a) or returned to the contributor. If any such contribution is deposited, it shall not be used for any disbursements by the political committee until the contribution has been determined to be legal. The political committee must either establish a separate account in a campaign depository for such contributions or maintain sufficient funds to make all such refunds. The treasurer may request redesignation or reattribution in accordance with 11 CFR §110.1(b), §110.1(k), or §110.2(b). If a redesignation or reattribution is not obtained, the treasurer shall within 60 days of the treasurer's receipt of the contribution, refund the contribution to the contributor. Any contribution which appears to be illegal under 11 CFR §103.3(b)(3) and which is deposited in a campaign depository, the treasurer shall make and retain a written record noting the basis for the appearance of illegality. A statement noting that the legality of the contribution is in question shall be included in the report noting the receipt of the contribution. If a contribution is refunded to the contributor because it cannot be determined to be legal, the treasurer shall note the refund on the report covering the reporting period in which the refund is made.

Section 110.1(l)(5) of Title 11 of the Code of Federal Regulations states that if a political committee does not retain the written records concerning reattribution, the reattribution shall not be effective, and the original attribution shall control.

Section 110.9(a) of Title 11 of the Code of Federal Regulations states that no political committee shall accept any contribution or make any expenditure in violation of the provisions of part 110.

Section 102.5(a)(1) of the Code of Federal Regulations states, in part, that organizations, including party committees, that finance political activity in connection with both federal and non-federal elections and which qualify as political committees shall either: establish a political committee that receives only contributions subject to the prohibitions and limitations of the Act regardless if such contributions are used in connection with federal or non-federal elections; or, as was done by NCREC, establish a separate federal account which shall be treated as a separate federal political committee. Such federal accounts shall comply with the requirements of the Act and only funds subject to the Act's prohibitions and limitations shall be deposited in the separate federal account.

Section 102.17(b)(5) of Title 11 of the Code of Federal Regulations explains that, except to the extent that the contributor has previously contributed to any of the participants to the joint fundraising effort, a contributor may make a contribution to the joint fundraising effort which contribution represents the total amount that the contributor could contribute to all of the participants.

Section 102.17(c)(1) of Title 11 of the Code of Federal Regulations states, in part, that the participants in a joint fundraising activity shall enter into a written agreement. The written agreement shall identify the fundraising representative and shall state a formula for the allocation of fundraising proceeds. The fundraising representative shall retain the written agreement for a period of three years and shall make it available to the Commission on request.

Section 102.17(c)(4) of Title 11 of the Code of Federal Regulations establishes that both the fundraising representative and the participating committee are responsible for screening contributions received through a joint fundraising effort to insure that prohibitions and limitations of 11 CFR Parts 110 and 114 are followed.

Section 102.17(c)(6) of Title 11 of the Code of Federal Regulations states, in part, that the fundraising representative shall allocate proceeds according to the formula stated in the fundraising agreement. If the distribution according to the allocation formula results in a violation of the contribution limits of 11 CFR §110.1(a), the fundraising representative may reallocate the excess funds. Reallocation shall be based upon the remaining participants' proportionate shares under the allocation formula. If reallocation results in a violation of a contributor's limit under 11 CFR §110.1, the fundraising representative shall return to the contributor the amount of the contribution that exceeds the limit. Designated contributions that exceed the contributor's limit to the designated participant under 11 CFR part 110 may not be reallocated by the fundraising representative absent the prior written permission of the contributor.

NCREC received funds from two separate joint fundraising activities, Business Leaders Salute Faircloth (BLSF) and North Carolina Victory Fund (NCVF).

The NCREC Treasurer acknowledged that there were no written joint fundraising agreements for either activity. In the case of BLSF, the Treasurer believes that "funds were allocated to the NCREC after the (Lauch) Faircloth campaign had reached an individual's contribution limit". The associated fundraising expense allocation was based on the percentage of funds received by each participant. The Audit staff received a letter from Mr. Charles F. Fuller who was in charge of the BLSF joint fundraiser. That letter stated "there was no written agreement regarding the allocation of funds received by the joint committee", but that there was an oral agreement related to allocation of "donations" and that each committee was "responsible for ensuring that any donations received by them from the BLSF committee complied with the applicable limitations on campaign contributions." The NCREC provided the Audit staff with copies of the response cards that were returned with contributions to BLSF. The disclaimer notice states that the fundraising dinner is authorized by Lauch Faircloth for Senate, North Carolina Victory '98, and the North Carolina Republican Party and that the contributions are limited to "\$1,000 per person for the general election." The method of allocating contributions among the participants was not specified.

As for the NCVF activity, the NCREC treasurer offered no explanation of the allocation method for the funds received or fundraising expenses. The contribution response device used by NCVF states; "authorized by Faircloth for Senate, Victory '98, and the North Carolina Republican Party". The allocation formula is stated as follows:

"The first \$1,000 of each contribution from an individual and the first \$5,000 of any contribution from a qualified multicandidate committee PAC will be allocated to Faircloth for Senate and designated for the general election. Any portion of any contribution in excess of these amounts or that would cause a contributor to exceed applicable contribution limits to Faircloth for Senate will be allocated to the federal account of Victory '98. All other contributions, such as individual contributions in excess of the federal limits or contributions not lawful under federal law, will be allocated to Victory '98 for use under North Carolina election laws."

NCREC received net proceeds from the BLSF joint fundraiser of \$128,227, supported by Memo Schedules A detailing the receipt of \$251,776 from 87 contributors. These contributions were disclosed on NCREC's reports that covered the period July 1, 1998 through November 11, 1998. Similarly, net proceeds of \$50,000 were received from the NCVF, arising from 44 contributions totaling \$81,665 received by NCVF between July 31, 1998, and November 5, 1998.

For all contributors who made contributions to the joint fundraisers, the Audit staff reviewed NCREC receipt records to determine if any of the contributors had also contributed directly to NCREC. As a result of this analysis, fifteen excessive contributions totaling \$115,416 were identified among the contributions resulting from the BLSF. The review also determined that there were 6 excessive contributions received

by NCREC from the NCVF activity totaling \$17,750. Therefore, NCREC received a total of \$133,166 ($115,416 + 17,750$) in excessive contributions resulting from joint fundraising activities.

On May 10, 1999, NCREC responded to a March 24, 1999 inquiry by the Commission's Reports Analysis Division (RAD) regarding possible excessive contributions as a result of proceeds from the BSLF joint fundraising. The response stated, in part, "Of the \$128,227.25 we (NCREC) received from the joint fund raising committee, \$104,250 should have been deposited into our non-federal account for contributions in excess of the \$5,000 limit per calendar year... We have booked a payable from our federal account to our non-federal account for the \$104,250 transfer." At the time of NCREC's response to the RAD inquiry the 60-day period provided to resolve excessive contributions had passed. Further, other than the language noted above from the NCVF solicitation, no notice of the transfer of all or a portion of the contributions was given to the contributors³. NCREC also explained that there were not sufficient funds in its federal account with which to make the entire transfer. On May 5, 1999, NCREC transferred \$30,000 to its non-federal account and filed Schedules D showing the remaining excessive amount as a debt owed by the federal account to the non-federal account. Payment of this debt was completed by July 28, 1999. The \$50,000 received from NCVF joint activity was not considered in the NCREC calculation of excessive contributions. Notwithstanding the manner in which the BLSF excessive contributions (\$104,250) were resolved, they were not resolved timely.

The Audit determined that excessive contributions of \$28,916 ($\$133,166 - \$104,250$) remained unresolved. Prior to the end of fieldwork, the Audit staff provided the NCREC Accounting Director with schedules detailing how the unresolved excessive amount was determined.

At the Exit Conference, the NCREC Chairman stated that they became aware of the excessive contribution problem when RAD's letter requesting additional information was received. The NCREC Accounting Director stated that BLSF was in total control of the fundraising activity and operated without NCREC input. BLSF sent "NCGOP" the information (Schedules A) that needed to be reported. The Accounting Director acknowledged that the joint fundraising contributions should have been reviewed to determine if the contributors had made other contributions to NCREC and if any were excessive. The NCREC representatives concurred that there is an additional \$28,916 in excessive contributions in need of resolution. The Chairman stated that they wished to handle this matter in the same manner that resolved the previously determined \$104,250 in excessive contributions, by making a transfer to the non-federal account.

Subsequent to the exit conference, NCREC provided a copy of a \$12,000 check, dated March 22, 2000, made payable to the NCGOP-STATE Committee to transfer part of the \$28,916 in excessive contributions noted above. NCREC also sent a

³ The Request for Additional Information states that it is in the NCREC's best interest to advise the contributors of the transfer, but does not state that it is required.

letter, dated March 29, 2000, that points out that during the period when the joint fundraisers were taking place, administrative expenses (payroll, utilities, office supplies) were paid by the federal account that could have been allocated between its federal and non-federal accounts. These expenses were not allocated because the non-federal account did not have "enough money". This resulted in the federal account paying a disproportionate share of these expenses. NCREC states, "The total is \$29,694.59 which exceeds the \$28,916.00 in excessive contributions from BLSF not deposited to our non-federal account." The suggestion appears to be that an offset should be allowed between funds that could have been transferred to the federal account within the 70 day time period provided for the reimbursement of shared expenses, and funds that could have been transferred to the non-federal account within 60 days of the receipt of the contribution if the contributors had been notified of the transfer and given an opportunity to request a refund. No such notice to the contributors was made.

NCREC is correct that there are administrative expenses paid by the federal account that could have been reimbursed by the non-federal. The time allowed for such transfers is long past. However, those facts are not relevant to the central question at hand. The NCREC received excessive contributions in the amount of \$28,916 which were yet to be resolved. The time allowed by regulation to resolve those contributions in any fashion other than a refund to the contributor has expired.

In the Interim Audit Report it was recommended that the NCREC provide evidence demonstrating that the contributions in question are not excessive. Absent the presentation of such evidence, it was recommended that NCREC refund excessive contributions totaling \$28,916 and provide evidence of the refunds in the form of copies of the front and back of the negotiated refund checks. The Interim Audit Report also explained that the NCREC was permitted to reverse the March 22, 2000 transfer to the non-federal account to assist in making the necessary refunds. Further, it was noted that if after reversing the earlier transfer, sufficient funds were not available to make the necessary refunds, the excessive contribution amounts should be disclosed as debts owed to the contributors on Schedule D (Debts and Obligations) until such time that funds become available.

Finally, in light of the fact that its prior communications with RAD⁴ may have resulted in the NCREC's decision to transfer excessive contributions of \$104,250 to the non-federal account without any notice to the contributors, the Interim Audit Report did not recommend those contributions be refunded. The NCREC was given the opportunity to provide any additional comments or explanations it felt necessary with respect to these excessive contributions having been resolved untimely.

⁴ Based upon a discussion with the RAD analyst, it appears that RAD advised NCREC to transfer the excessive contributions (\$104,250) out of the federal account and presented refunding the excessive contributions as an option. However, RAD did not explain that the Commission has required committees to refund excessive contributions that were not transferred within 60 days and where the contributors were not informed of the transfer and given an opportunity to request a refund.

In its response to the Interim Audit Report, the NCREC explains that:

“In March 1999, NCGOP transferred \$104,250 of the \$133,166 BLSF donations at issue to the NCGOP’s non-federal account. NCGOP made the transfer after being instructed to do so by the FEC’s Reports Analysis Division (RAD), which advised NCGOP’s staff that donations from a joint fundraising committee to NCGOP were not subject to the \$5,000 federal activities limit if deposited in the NCGOP’s non-federal account and used for state or local campaign activities. Because the FEC has already approved NCGOP’s treatment of the transferred funds, the only issue raised in the Report regarding BLSF funds is the treatment of the remaining \$28,916 in BLSF funds received by NCGOP.

“The report states ... that the NCGOP did not notify donors before reallocating \$104,250 in BLSF donations from its federal to non-federal account in 1999. NCGOP did not provide such notice because it did not view the \$104,250 as amounts in excess of federal campaign contribution limits. NCGOP made the transfer, after consultation with RAD, to correct its error in depositing BLSF funds initially in its federal account”

The NCREC further states that the Interim Audit Report fails to explain the grounds for the Commission’s determination that any contributions received by NCGOP were excessive and requests that the basis be explained in the final audit report. It also contends that the joint fundraising regulations are complex and not clear on many aspects of donations received from joint fundraising committees, such as the limits on contributions. The NCREC argues that no regulation or statute specifically imposes a \$5,000 limit on donations received by a state political party from a joint fundraising committee between a state political party and another political committee. The NCREC contends that in its efforts to comply with the contribution limits pertaining to contributions from a joint fundraising committees, the NCGOP staff interpreted the Commission’s joint fundraising committee regulations to impose no federal limit on donations received from a joint fundraising committee if those funds were applied to the party’s state and local campaign activities. The NCREC then notes that unlike the \$5,000 per contributor limitation on contributions to a state party committee for activities on behalf of federal candidates, North Carolina law has no such limitation on donations to be used for state and local activities. Finally, NCREC notes that the contributions at issue were not placed in “a special campaign depository” or returned to the contributor within 60 days based on the conclusion that federal limitations on contributions do not apply to funds received from a joint fundraising committee and used for state and local activities.

After arguing that these were not excessive contributions, the NCREC states that it has reversed the March 22, 2000 transfer of \$12,000 to its non-federal account as suggested in the Interim Audit Report and has returned the \$28,916 to its contributors. On December 19, 2000, NCREC provided evidence (copies of the front and back negotiated refund checks) that refunds of all but one excessive contribution have been made. NCREC states that a copy of the remaining \$5,000 negotiated refund check will be submitted when it is received from the bank.

The NCREC's response to the Interim Audit Report appears to alternatively argue two positions. First, that neither the Act nor the regulations limit the amount of a contribution that a state party may accept from a joint fundraising committee, and second, that contributions to be used for state and local activities are not limited by the Act.

With respect to "contributions" from a joint fundraising committee to a participant in the joint fundraising effort, there are no such contributions. Rather, there are only transfers of contributions made to each participant through the joint fundraising committee. Any amount received by a participant in the joint fundraising effort that exceeds its allocated share of the proceeds is a contribution from the other participants, not the joint fundraising committee. For contributions received through a joint fundraising committee, the identity of the contributors is attached to each participants share of the gross amount of each contribution. Contributions to a joint fundraiser must be aggregated with all other contributions from the same contributor so that each participating committee can determine compliance with the contribution limitation. The fact that the contribution is received through a joint fundraising committee does not exempt it from the contribution limitations of 2 USC 441a. That is made clear at sections 11 CFR §102.17 (c) (4) and (5) of the Commission's regulations.

With respect to contributions to the non-federal account, NCREC is correct in saying that neither the Act nor the Commission's regulations place limits on such contributions. However, for political committees that finance both activities relating to federal and non-federal elections, 11 CFR 102.5 provides two operating options. Either accept only federally permissible contributions or maintain a separate federal account that is treated as a separate political committee that receives only federally permissible contributions. NCREC contends that even if contributions were deposited into the federal account they should not be treated as excessive contributions to the federal account because (1) the funds would ultimately be used for state and local activities and (2) after consulting with RAD, the excessive portions were transferred to its non-federal account. In NCREC's case those funds remained in the federal account and were available during a federal election. The Commission's regulations at 11 CFR 103.3 specify that contributions deposited in the federal account that exceed the contribution limitations, and that are not otherwise resolved within 60 days, must be returned to the contributor. Contrary to NCREC's contentions, these contributions were in excess of the limitation and they were resolved in an untimely manner.

07.025.2366



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 26, 2001

Mr. Steven B. Long, Treasurer
North Carolina Republican Executive Committee
P.O. Box 12905
Raleigh, NC 27605

Dear Mr. Long:

Attached please find the Final Audit Report on the North Carolina Republican Executive Committee. The Commission approved the report on January 19, 2001.

The Audit Report will be placed on the public record on January 31, 2001. Should you have any questions regarding the public release of the report, please contact the Commission's Press Office at (202) 694-1220. Any questions you have related to matters covered during the audit or in the report should be directed to Mr. Henry Miller or Mr. Alex Boniewicz of the Audit Division at (202) 694-1200 or toll free at (800) 424-9530.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Costa".

Robert J. Costa
Assistant Staff Director
Audit Division

Attachment as Stated

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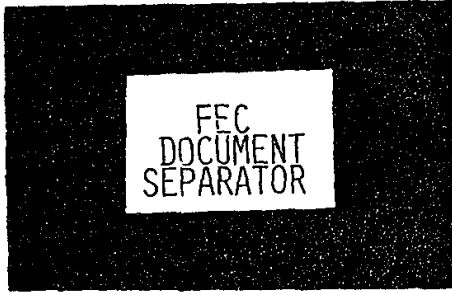
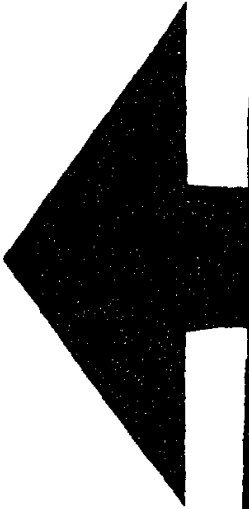
CHRONOLOGY

NORTH CAROLINA REPUBLICAN EXECUTIVE COMMITTEE

Audit Fieldwork	February 22 - March 15, 2000
Interim Audit Report to the Committee	September 28, 2000
Response Received to the Interim Audit Report	November 15, 2000
Final Audit Report Approved	January 19, 2001

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