

Sebastian County Republican Women
2401 South T
Fort Smith, Arkansas 72901

July 16, 1999

Gold Circle - Federal Committee
First National Bank Building, Suite 600
Fort Smith, AR 72901

Dear Sirs:

Please accept this letter as confirmation of the fact that the \$5,000 contribution we made to your PAC in September 1998 was with permissible funds.

Additionally, after discussing with you the options available to us to eliminate the need for us to register with the FEC, please be advised as follows:

We do not want a refund of our contribution, but rather, we ask that you redesignate \$4,000 of our \$5,000 contribution as follows - \$1,000 each to Gold Circle - State PAC #'s 1, 2, 3 and 4. In this manner, \$4,000 of our contribution will be transferred to non-federal accounts and we won't have to register with the FEC. We understand that you don't have sufficient funds to effectuate the transfer at this time and we acquiesce in your declaration of debts to the state PAC's for the amounts stated above.

Thank you for your help in this matter.

Sincerely,

Donna Fulmer, President-SCRW

Gold Circle - Federal Committee
First National Bank Building, Suite 600
Fort Smith, Arkansas 72901

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

JUL 23 1 21 PM '99

July 16, 1999

Federal Election Commission
Attn: Dominick Ciaraldi
999 E Street, N.W.
Washington, DC 20463

Re: Attached June 23, 1999 notice

Dear Dominick:

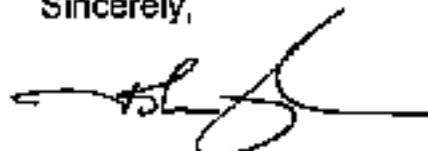
We are in receipt of the attached notice. We have contacted both organizations. Each one has confirmed to us that their contributions were made with permissible funds.

We discussed with both organizations that they had made contributions exceeding \$1,000 to influence federal elections and therefore would become subject to FEC registration requirements. Neither organization wanted to register with the FEC. We then told them they had two options available to them, 1) they could have us refund them \$4,000 of their \$5,000 contribution or 2) request us to transfer \$4,000 of their \$5,000 contribution to a non-federal account. Each organization has requested that we transfer \$4,000 of their \$5,000 contribution to a non-federal account.

We do not have sufficient funds to transfer the \$8,000 total to the non-federal accounts at this time, so we have declared a debt of \$2,000 each to each of the Gold Circle - State PAC's #1, 2, 3 and 4 for the total of \$8,000. The Gold Circle - State PAC's #1, 2, 3 and 4 have accepted this arrangement. I am their treasurer also and confirm this arrangement.

Attached are the letters from both organizations requesting us to take the above described actions. If I can be of further assistance, please let me know.

Sincerely,



John C. Langham, Treasurer



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

John Langham, Treasurer
Gold Circle - Federal Committee
First National Bank Building, Suite 600
Fort Smith, AR 72901

JUN 23 1999

Identification Number: C00289728

Reference: October Quarterly Report (7/1/98-9/30/98)

Dear Mr. Langham:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the

donor(s) in accordance with 11 CFR §103.3(b). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Dominick Ciaraldi
Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 116

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)

GRACIE - FEDERAL COMMITTEE

DAC

A. Full Name, Mailing Address and ZIP Code
 SEBASTIAN CO. REPUBLICAN COMMITTEE
 P O BOX 1845
 FORT SMITH, AR 72902

Name of Employer: N/A
 Date (month, day, year): 9/15/98
 Amount of Each Receipt this Period: 5000.00

Occupation:
 Aggregate Year-to-Date: \$ 5000.00

Receipt For: Primary General
 Other (specify):

B. Full Name, Mailing Address and ZIP Code
 SEBASTIAN CO. REPUBLICAN WOMEN
 2401 SOUTH T STREET
 FORT SMITH, AR 72901

Name of Employer: N/A
 Date (month, day, year): 9/24/98
 Amount of Each Receipt this Period: 5000.00

Occupation:
 Aggregate Year-to-Date: \$ 5000.00

Receipt For: Primary General
 Other (specify):

C. Full Name, Mailing Address and ZIP Code

Name of Employer:
 Date (month, day, year):
 Amount of Each Receipt this Period:

Occupation:
 Aggregate Year-to-Date: \$

Receipt For: Primary General
 Other (specify):

D. Full Name, Mailing Address and ZIP Code

Name of Employer:
 Date (month, day, year):
 Amount of Each Receipt this Period:

Occupation:
 Aggregate Year-to-Date: \$

Receipt For: Primary General
 Other (specify):

E. Full Name, Mailing Address and ZIP Code

Name of Employer:
 Date (month, day, year):
 Amount of Each Receipt this Period:

Occupation:
 Aggregate Year-to-Date: \$

Receipt For: Primary General
 Other (specify):

F. Full Name, Mailing Address and ZIP Code

Name of Employer:
 Date (month, day, year):
 Amount of Each Receipt this Period:

Occupation:
 Aggregate Year-to-Date: \$

Receipt For: Primary General
 Other (specify):

G. Full Name, Mailing Address and ZIP Code

Name of Employer:
 Date (month, day, year):
 Amount of Each Receipt this Period:

Occupation:
 Aggregate Year-to-Date: \$

Receipt For: Primary General
 Other (specify):

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only) \$ 15,000.00

Sebastian County Republican Committee

P.O. Box 1845

Fort Smith, Arkansas 72902-1845

July 16, 1999

Gold Circle - Federal Committee
First National Bank Building, Suite 600
Fort Smith, AR 72901

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Thank you for your help in this matter.

Sincerely,

Richard B. Conff, Chairman

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.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> First Class Mail	POSTMARKED 07-20-99
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
  PREPARER	 07-26-99 DATE PREPARED