

ETEXT ATTACHMENT

01/09/2004 14 : 43

Jane Parks
Campaign Finance Analyst
Reports Analysis Division

Identification # C00034033

Re.: Your letter 12/10/2003; Amended April Quarterly Report (1/1/03-3/31/03), received 10/22/03

1. The SC Optometric Association PAC is actually a State PAC, which was not identified on the check we received. We have transferred the contribution of \$ 1,000 to our operations account and are sending a copy of the check to document the transaction. We will show the transfer-out in our February 2004 report. The contribution from IMIC Hotels was a personal contribution from E. L. Pooser and was erroneously entered as a business. We have changed the entry accordingly.

2. The Hospital Association PAC is actually a State PAC, which was not identified on the check we received. We have transferred the contribution of \$ 3,500 to our operations account and are sending a copy of the check to document the transaction. We will show the transfer-out in our February 2004 report.

3. The SCGOP is using the following best effort to obtain identification of all individuals who contribute in excess of \$200. Our original solicitation includes a clear and conspicuous request for this information which includes the requirements of the federal law to provide such information. If the information is not provided, we make a follow up effort per phone. If the needed information is still not provided, we search the internet to obtain the information.

4. The receipt and disbursements from the "SCGOP Federal Account" were internal transfers and should not have been itemized. We changed the report accordingly.

5. The disbursement for airfare on Schedule H4 for Norman Coleman were not payments on behalf of Mr. Coleman. He was a speaker at one of our fundraising events. The money raised was both federal and non-federal.

6. During the first quarter of 2003 none of our employees spend more than 25% of their compensated time on Federal election activity or activities in connection with a Federal election. Therefore, the salaries and payroll taxes should not have been paid from our federal account. We transferred \$ 17054.56 from our federal to our non-federal account and will mail the appropriate documentation. We will report the transfer-out in our February 2004 report.

7. The payment on Schedule H4, Line 21a for "direct mail, direct mail annual report, printing bsn. cards, printing, printing programs, tickets, banners, video for silver elephant" were general expenditures; they did not refer to a clearly identified candidate for Federal office, nor did they promote, support, attack, or oppose any candidate for Federal office.

8. The disbursement of \$ 500 with the description "corrion acc to FEC let 3/05" to our non-federal account was a reimbursement of funds erroneously transferred from our federal account to our non-federal account which was reported in the year-end report for 2001 (see your letter 3/05/03 concerning the amended year end report 7/01/01-1/07/02, received 10/24/02).

9. We have amended the return to reflect the salaries on Schedule, Line 30b.

Glen O'Connell