



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Anne P. Petera, Treasurer
Republican Party of Virginia Inc.
115 East Grace Street
Richmond, VA 23219

Identification Number: C00001305

JUN 21 2000

Reference: April Quarterly Report (1/1/00-3/31/00)

Dear Ms. Petera:

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:

-Please be advised that the ballot composition ratio for allocation of generic voter drive expenses should be the same for state party committees in the same state during calendar year 2000. Schedule H1 of your report discloses the federal portion of 2000 generic voter drive expenses to be 75%. The federal portion is calculated by checking all the offices that will appear on the next general election ballot and dividing the points for federal offices by the total points for all offices. Please verify that your Schedule H1 adequately reflects what will appear on the next general election ballot. If necessary, please amend your report to include a corrected H1.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): expense reimbursement, consulting and professional fees. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule H4 discloses a disbursement(s) which is categorized as a fundraising expense(s); however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the direct costs of each fundraising event in which the committee collects both federal and non-federal funds. The costs are allocated according to the

funds received ratio and reported on Schedule H2. 11 CFR §§106.5(f) and 106.6(d). Please file a Schedule H2 to disclose the ratio for the fundraising event(s).

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct EVENT YEAR-TO-DATE totals.

-Schedule A supporting Line 17 of your report discloses a payment(s) from a federal candidate committee(s) for goods and/or services provided by your committee. 11 CFR §100.7(a)(3)(A) states that "...the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution." Examples of goods and services include equipment, supplies, personnel and membership lists. The term "usual and normal charge" for goods is defined as "...the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution". The usual and normal charge for services is defined as "...the hourly or piecemeal charge for the services at a commercially reasonable rate prevailing at the time the services were rendered." 11 CFR §100.7(a)(iii)(B)

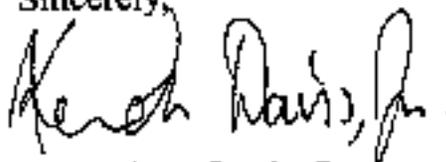
Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided to the federal candidate committee(s) and explain the steps your committee took in determining the amount(s) charged. If your committee provided the goods and/or services at less than the usual and normal charge, the difference between the two is considered to be an in-kind contribution by your committee to the federal candidate committee(s) and is subject to the limits set forth at 2 U.S.C. §441a. (11 CFR §100.7(a)(iii)(A))

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions

received from federal candidates should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

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 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Kenneth A. Davis, Jr.

Reports Analyst

Reports Analysis Division

SCHEDULE A		ITEMIZED RECEIPTS		Use separate schedule(s) for each category of the Detailed Summary Page	28 / 74 FOR LINE NUMBER 17
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) Republican Party of Virginia, Inc.					
Full Name, Mailing Address, and ZIP Code Brey for Congress P O Box 17085 Richmond VA 23226-7085		Name of Employer Occupation		Date (month, day, year) 02/02/2000	Amount of Each Receipt This Period 2378.00 voter list
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$ 2378.00			
Full Name, Mailing Address, and ZIP Code Friends of Walker Steach 4551 Cox Road Suite 110 Glen Allen VA 23060-6740		Name of Employer Occupation		Date (month, day, year) 02/23/2000	Amount of Each Receipt this Period 423.24 postage reimbursement
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$ 423.24			
Full Name, Mailing Address, and ZIP Code Keyes 2000, Inc. 4700 Surry Pl Alexandria VA 22304		Name of Employer Occupation		Date (month, day, year) 01/13/2000	Amount of Each Receipt this Period 3392.00 voter list
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$ 3392.00			
Full Name, Mailing Address, and ZIP Code McCain 2000, Inc. P. O. Box 25382 Alexandria VA 22313		Name of Employer Occupation		Date (month, day, year) 03/07/2000	Amount of Each Receipt this Period 12000.00 voter list
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$ 12000.00			
Full Name, Mailing Address, and ZIP Code Tom Davis for Congress 2459 Downing Ct Annandale VA 22003		Name of Employer Occupation		Date (month, day, year) 02/02/2000	Amount of Each Receipt this Period 2000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date > \$ 2000.00			
KD					
SUBTOTALS of Receipts This Page (Optional)					
TOTALS This Period (last page this line number only)					20133.24

