



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Richard F. Neel, Jr., Treasurer
Republican Party of Virginia Inc.
115 East Grace Street
Richmond, VA 23219

MAY 29 2002

Identification Number: C00001305

Reference: Year End Report (7/10/01-12/31/01)

Dear Mr. Neel:

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:

-The totals listed on Lines 21(a)(i), 21(a)(ii), 21(b), and 31, Column B of the Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-On Schedule D of your previous report, you disclosed a debt(s) owed to numerous vendors. This obligation(s), however, has been omitted from this report. Please amend your report to include this debt(s) on Schedule D and Line 10 of the Summary Page. All debts and obligations must be disclosed until extinguished. 11 CFR §104.11

-The outstanding balance of a debt owed to a creditor at the close of one report should be exactly the same as the outstanding balance beginning the period of the next report. This report shows a beginning outstanding balance(s) to numerous vendors, which is not identical to the ending outstanding balance(s) for the creditor(s) on the 2001 30 Day Post Special General Report (5/31/01-7/9/01) Report. Please amend your report to clarify the discrepancy.

-The Detailed Summary Page, on Line 18 Column A of your report, discloses \$695,600 in transfers from the non-federal account for joint activity for the reporting period. However, Line 21 (a)(ii) Column A discloses \$433,875.60 as the non-federal share for joint activity for the reporting period. While the non-federal account is permitted to transfer funds to the federal account for shared activity, transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(c)(2) Please clarify the nature of the transfers-in from the non-federal account.

The Commission recommends that you immediately transfer back to the non-federal account, the total excessive amount which was received by your federal account outside the 70-day time period. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the purpose for several joint expenditures to various vendors. Note that the unique identifying code for an event is not considered an adequate description of purpose. Please amend your report to include this missing information.

-Please clarify all expenditures made for media placement on Schedule(s) H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E, or F supporting Lines 23, 24, or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Schedule H4 discloses payments made to credit card companies for shared federal and non-federal activity. Please be advised that these payments must identify as memo entries, the original vendors from which you have purchased an item or service regardless of the amount. Please amend your report by providing the name and mailing address of the original vendor, along with the date, amount and purpose of each expenditure. 11 CFR §104.10.

-Schedule A of your report (pertinent portions attached) discloses one or more contributions which appear to be from a corporation(s). 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received a prohibited contribution(s), you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR 103.3(b)(1).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on 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 a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

-Schedule A of your report (pertinent portion(s) attached) discloses one or more contributions which appear to be from a corporation(s). 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation. Limited liability companies (LLC's) that choose to be treated as corporations under the Internal Revenue Service rules, or have shares that are traded publicly, are considered corporations. In the event that the LLC is treated as a partnership under IRS rules, the aforementioned contributions are to be attributed to each member in direct proportion to his or her share of the LLC's profit or by agreement of its members. Each member who has contributed in excess of \$200 for the calendar year should be identified by name, address, amount of contribution, name of employer, occupation and aggregate total on Schedule A. 11 CFR §110.1(g)(1) through (5).

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received a prohibited contribution(s), you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

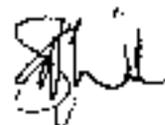
If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR 103.3(b)(1).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on 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 to transfer-out or refund the amount will be taken into consideration.

A response or 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. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. 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,



Scott Walker
Reports Analyst
Reports Analysis Division

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

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

FOR LINE NUMBER: PAGE 71 / 317
(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 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 committee 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.

A. Full Name (Last, First, Middle Initial)
Mr. Roger Mehan

Date of Receipt
NOV 30 2001

Mailing Address
300 Montgomery St Ste 200
City State Zip Code
Alexandria VA 22314-1516

Amount of Each Receipt this Period
100.00

FEC ID number of contributing federal political committee

Name of Employer Occupation
NRE Properties, Inc. Real Estate Investment

Receipt For: 2001 Aggregate Year-to-Date \$
Primary General 235.00
Other (specify) \$

Transaction ID: SA11A1.49885

B. Full Name (Last, First, Middle Initial)
Meritt International, Inc.

Date of Receipt
OCT 07 2001

Mailing Address
500 E Broad St
City State Zip Code
Richmond VA 23219-1812

Amount of Each Receipt this Period
3180.00

FEC ID number of contributing federal political committee

Name of Employer Occupation

Receipt For: 2001 Aggregate Year-to-Date \$
Primary General 3180.00
Other (specify) \$

Transaction ID: SA11A1.40079

C. Full Name (Last, First, Middle Initial)
Ms. J. Ann Math

Date of Receipt
NOV 02 2001

Mailing Address
8725 Cinnamon Creek Dr
City State Zip Code
Vienna VA 22182-1402

Amount of Each Receipt this Period
250.00

FEC ID number of contributing federal political committee

Name of Employer Occupation
Requested

Receipt For: 2001 Aggregate Year-to-Date \$
Primary General 250.00
Other (specify) \$

Transaction ID: SA11A1.49745

SUBTOTAL of Receipts This Page (add each)	3540.00
TOTAL This Period (add page this line NUMBER only)	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

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

FOR LINE NUMBER:		PAGE 28/317	
(check only one)			
<input checked="" type="checkbox"/>	11a	<input type="checkbox"/>	11b
<input type="checkbox"/>	13	<input type="checkbox"/>	14
<input type="checkbox"/>	15	<input type="checkbox"/>	16
<input type="checkbox"/>	17	<input type="checkbox"/>	18

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 (Last, First, Middle Initial) A. Creative Direct, LLC		Date of Receipt M / D / Y 08 / 10 / 2001
Mailing Address 4914 Fitzhugh Ave. Ste 200		Amount of Each Receipt This Period 1500.00
City Richmond	State Zip Code VA 23230	
FEC ID number of contributing federal political committee.		
Name of Employer	Occupation	
Receipt For: 2001	Aggregate Year-to-Date *	
Primary <input type="checkbox"/> General <input checked="" type="checkbox"/>	1500.00	
Other (specify) *		Transaction ID: SA11A1.40384

Full Name (Last, First, Middle Initial) B. Mr. George D Croft		Date of Receipt M / D / Y 12 / 10 / 2001
Mailing Address 7600 Tremayne Pl Apt 101		Amount of Each Receipt This Period 56.00
City McLean	State Zip Code VA 22102-7616	
FEC ID number of contributing federal political committee.		
Name of Employer Healthcare	Occupation Programmer	
Receipt For: 2001	Aggregate Year-to-Date *	
Primary <input type="checkbox"/> General <input checked="" type="checkbox"/>	255.00	
Other (specify) *		Transaction ID: SA11A1.60889

Full Name (Last, First, Middle Initial) C. Mr. George D Croft		Date of Receipt M / D / Y 12 / 10 / 2001
Mailing Address 7600 Tremayne Pl Apt 101		Amount of Each Receipt This Period 75.00
City McLean	State Zip Code VA 22102-7616	
FEC ID number of contributing federal political committee.		
Name of Employer Healthcare	Occupation Programmer	
Receipt For: 2001	Aggregate Year-to-Date *	
Primary <input type="checkbox"/> General <input checked="" type="checkbox"/>	330.00	
Other (specify) *		Transaction ID: SA11A1.50970

SUBTOTAL of Receipts This Page (indicated)	1630.00
TOTAL This Period (last page this line number only)	

