FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

September 21, 1995

Donna Singleton, Treasurer
National Republican Congressional
Committee Expenditures
320 First Street
Washington, DC 20003

Identification Number: C00075820

Reference: April Monthly Report (3/1/95-3/31/95)

Dear Ms. Singleton:

On August 30, 1995 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your September 15, 1995 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-The Commission notes the correction in your reporting of the in-kind donation for joint fundraising activity 313-323 on Disbursement Schedule H4 based on Advisory Opinion 6074 (AO 1992-33). However, in the Advisory Opinion, the Commission concluded a national party committee may accept corporate in-kind donations in conection with fundraising activities, but only if one of two conditions is met: (1) the amount of the Federal share of goods or services is paid to the non-federal account in advance or on receipt; or (2) sufficient funds to pay for the Federal share of goods or services have been transferred to a non-federal account in advance. Your Schedule H4 shows the receipt date of the in-kind donation as 3/20/95 yet the transfer date of the Federal share is 3/31/95, eleven days after receipt. In addition, your Schedule H2 shows the allocation ratio for fundraising activity 313-323 to be 60% for the Federal share and 40% for the non-federal share. Your Schedule H4 shows the transfer amount of Federal share to be only 40% of the total in-kind donation instead of 60%. Please provide clarification and/or correction and establish procedures to insure future compliance.

95039821006

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Donald L. Averett on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

9 5 0 3 9 7 8 2 1 0 7