



FEDERAL ELECTION COMMISSION
WASHINGTON, D. C. 20543

RQ-3

December 12, 2002

Jonathan Wheeler, Treasurer
Rhode Island Republican Party
643 East Avenue, Unit 101
Warwick, RI 02886

Identification Number: C00078196

Reference: Year End Report (7/1/01-12/31/01)

Dear Mr. Wheeler:

This letter is to inform you that as of December 11, 2002, the Commission has not received your response to our request for additional information, dated November 20, 2002. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

An adequate response must be received at the Commission by January 1, 2003. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

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 should have any questions regarding this matter, please contact Christopher Morse on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

A handwritten signature in cursive script that reads "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Jonathan Wheeler, Treasurer
Rhode Island Republican Party
643 East Avenue
Warwick, RI 02886

MAY 30 2002

Identification Number: C00078196

Reference: Year End Report (7/1/01-12/31/01)

Dear Mr. Wheeler:

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 beginning cash balance of this report should equal the ending balance of your Mid-Year Report (1/1/01-6/30/01). Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Line 6(a) of the Summary Page represents the total cash-on-hand as of January 1, 2001. This figure should be the same on all the reports covering the calendar year. Please amend your report to clarify the change made in Line 6(a).

-The totals listed on Lines 6(c), 7, 11(a)(iii), 11(b), 15, 18, 21(a)(i), 21(a)(ii), and 21(b), Column B of the Summary and 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.

-Your calculations for Lines 11(d), 19, 20, 21(c), 30, 31, Column B appear to be incorrect. Please provide the corrected totals on the Detailed Summary Page.

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-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 Tim Costa, Halsey Properties, JLM Consulting, Kentish Guards, Richard Kizarian, and Ralph Stuart Band, which is not identical to the ending outstanding balance(s) for the creditor(s) on the Mid-Year Report (1/1/01-6/30/01). Please amend your report to clarify the discrepancy.

-On Schedule D of your previous report, you disclosed a debt(s) owed to Advanced Mailing Services, Tim Bonin, Cogen's Printing, Direct Mail Services, Providence Marriott Hotel, Rep. Joan Quick, and Norma Willis. 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

-Schedule A of your report (pertinent portion(s) attached) discloses a receipt(s) of \$26,028.39 from the Rhode Island Republican Party. Please clarify whether this transfer(s) is from an account maintained by your committee for non-federal activity. If so, be advised that such a transfer is prohibited by 11 CFR §102.5(a)(1)(i) and the full amount of the transfer(s) should be returned to the non-federal account. Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on Schedule B supporting Line 22 of your next report.

If this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the impermissible funds or clarification of the transaction, will be taken into consideration.

-Schedule H4 of your report discloses a payment to Joseph Perkala for "Reimbursement-Print for Gov. Rowland". Please be advised that contributions to federal committees and/or non-federal committees/organizations do not qualify as shared expenses to be allocated between

RHODE ISLAND REPUBLICAN PARTY
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your federal and non-federal accounts. Contributions to federal committees should be disclosed on a Schedule B supporting Line 23 of the Detailed Summary Page and contributions to non-federal committees/organizations on a separate Schedule B supporting Line 29. Any reimbursement from your committee's non-federal account for any portion of this contribution(s) is not permissible. 11 CFR §102.5(a)(1)(i)

The Commission recommends that you immediately transfer the funds received by your federal account, as reimbursement for the non-federal portion, back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-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.

-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): consulting fee and event exp. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

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,



Christopher Morse
Campaign Finance Analyst
Reports Analysis Division

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

Use separate schedule(s) or each category of the Detailed Summary Page		FOR LINE NUMBER: (check only one)		PAGE 18 of 32	
<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input checked="" type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 17
<input type="checkbox"/> 19	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/>	<input type="checkbox"/>

Any information copied from such Reports and Statements may not be 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)
Rhode Island Republican Party

A. Full Name (Last, First, Middle Initial)
Rhode Island Republican Party

Mailing Address
551 South Main Street
City: Providence State: RI Zip Code: 02903

Date of Receipt
M M / D D / Y Y Y Y
09 / 17 / 2001

FEC ID number of contributing federal political committee: C00078196

Amount of Each Receipt this Period: 21028.39

Name of Employer: Occupation: Transfer from State

Receipt For: Primary General Other (specify) ▼ Aggregate Year-to-Date ▼
21028.39

Transaction ID: SA12.4145

B. Full Name (Last, First, Middle Initial)
Rhode Island Republican Party

Mailing Address
551 South Main Street
City: Providence State: RI Zip Code: 02903

Date of Receipt
M M / D D / Y Y Y Y
12 / 21 / 2001

FEC ID number of contributing federal political committee: C00078196

Amount of Each Receipt this Period: 5000.00

Name of Employer: Occupation: Transfer from State Acct.

Receipt For: Primary General Other (specify) ▼ Aggregate Year-to-Date ▼
26028.39

Transaction ID: SA12.4144

C. Full Name (Last, First, Middle Initial)
RNC

Mailing Address
310 First Street, S.E.
City: Washington State: DC Zip Code: 20003

Date of Receipt
M M / D D / Y Y Y Y
07 / 18 / 2001

FEC ID number of contributing federal political committee: C00003418

Amount of Each Receipt this Period: 10000.00

Name of Employer: Occupation: Transfer Party Building

Receipt For: Primary General Other (specify) ▼ Aggregate Year-to-Date ▼
10000.00

Transaction ID: SA12.4146

SUBTOTAL of Receipts This Page (optional)	36028.39
TOTAL This Period (last page this line number only)	36028.39

