



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Mr. Jonathan Wheeler, Treasurer
R I Republican Party
643 East Avenue
Warwick, RI 02886

MAY 01 2002

Identification Number: C00078196

Reference: Mid-Year Report (1/1/01-6/30/01)

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:

-On Schedule D of your previous report, you disclosed a debt(s) owed to the R I Republican Party - State Account, Capital View Associates, and James E. Murphy, Jr. 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 beginning outstanding balance of the next report. The 2000 Year End Report shows an ending balance to Rep. Joan Quick of \$7,650, while this report shows a beginning balance of \$3,825. Please amend your report to clarify this discrepancy.

-Your report discloses an outstanding balance(s) beginning this period for a debt(s) owed to JLM Consulting and the Providence Marriott Hotel. However, an outstanding balance(s) at the close of the period was not disclosed on your 2000 Year End Report. Please amend your report(s) to clarify this discrepancy.

-Please be advised that the ballot composition ratio for allocation of administrative and generic voter drive expenses should be the same for state party committees in the same state. Schedule H1 of your report

discloses the federal portion of administrative and generic voter drive expenses to be 28.57%. 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.

-On Schedule H3 supporting Line 18 of the Detailed Summary Page, Lines i), ii)e), and iii)e) for the transfer-in from the "R I Republican State Central Comm" do not add up to the 6/30/01 \$13,558.75 total amount transferred. Please amend your report to correct this discrepancy. 11 CFR §104.10

-Schedule H4 of your report discloses several payments to Chase Manhattan, Diner's Club, JLM Consulting, and MBNA for "Office Supply Reimbursement", "Postage Reimbursement", "Travel Reimbursement", and "Office Supplies Reimbursement" (pertinent portions attached). 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund.

Please amend your report to clarify whether the payments to these apparent corporations were for expenditures that were intended to influence federal elections and provide the dates of the activity conducted by these apparent corporations. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) B and H4 of your report to clarify the following description(s): "Fee", "Consulting Fee", "Political Apparel", "Election Night Function", "Supplies Reimbursement", and "Uncoordinated Expenditures". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Please amend your report by providing the purpose for each disbursement itemized on Schedule(s) H4 supporting Line(s) 21(a).

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Each state or local party

committee utilizing separate federal and non-federal accounts is required to allocate any administrative expenses between the accounts in proportion to the BALLOT COMPOSITION METHOD derived from FEC Schedule H1. A Schedule H1 must be filed with the first FEC FORM 3X filed at the beginning of each calendar year. 11 CFR §106.5(d)

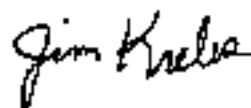
Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be provided during each two year election cycle beginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

-Your report includes multiple Schedules H1 with varying methods of allocation. One Schedule H1 has section A (Fixed Federal Percentage) checked. The other Schedules H1 have section D (Ballot Composition) completed with a federal percentage of 28.57% on each one. Please be advised that a state party committee should only submit one Schedule H1 with section D completed. Please amend your report to clarify these apparent discrepancies.

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,



Jim Krebs
Reports Analyst
Reports Analysis Division

**DISBURSEMENT SCHEDULE H4 (FEC Form 3X)
JOINT FEDERAL/NON-FEDERAL ACTIVITY SCHEDULE**

NAME OF COMMITTEE (In Full)
RI Republican State Central Comm.

A. Full Name (Last, First, Middle Initial)
Tim Bonin

Mailing Address
551 South Main Street

City	State	Zip Code	Category/Type
Providence	RI	02903	IND

Purpose/Event:
Consulting Fee

Description: Consulting Fee

Type of Allocated Activity:
 Admin/Voter Drive Fundraising
 Exempt Direct Candidate Support

Event Year-To-Date
22014.40

Date: 03 / 07 / 2001

FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
182.88		407.14		570.00

Transaction ID: H4.4249

A. Full Name (Last, First, Middle Initial)
Campaign Solutions

Mailing Address
228 South Washington Street Suite 240

City	State	Zip Code	Category/Type
Alexandria	VA	22314	ORG

Purpose/Event:
Mailing Services

Description: Mailing Services

Type of Allocated Activity:
 Admin/Voter Drive Fundraising
 Exempt Direct Candidate Support

Event Year-To-Date
43874.18

Date: 05 / 21 / 2001

FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
142.88		357.14		500.00

Transaction ID: H4.4303

A. Full Name (Last, First, Middle Initial)
Chase Manhattan

Mailing Address
500 White Clay Center Drive

City	State	Zip Code	Category/Type
Newark	DE	19711	ORG

Purpose/Event:
Office Supply Reimbursement

Description: Office Supply Reimbursement

Type of Allocated Activity:
 Admin/Voter Drive Fundraising
 Exempt Direct Candidate Support

Event Year-To-Date
9273.95

Date: 02 / 02 / 2001

FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
228.50		588.28		782.76

Transaction ID: H4.4209

SUBTOTAL of Joint Federal and Non-Federal Activity This Page

FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
532.22		1330.54		1862.76

TOTAL This Period (last page for each line only)(Federal share to 21(a)(i) and non-Federal share to 21(a)(ii))

FEDERAL SHARE		NON-FEDERAL SHARE		TOTAL AMOUNT

TOTAL This Period for the Non-Federal Share (used for line 31 of the detailed summary page)

NON-FEDERAL SHARE

**DISBURSEMENT SCHEDULE H4 (FEC Form 3X)
JOINT FEDERAL/NON-FEDERAL ACTIVITY SCHEDULE**

NAME OF COMMITTEE (In Full)
Rt Republican State Central Comm.

A. Full Name (Last, First, Middle Initial) Chase Manhattan			Type of Allocated Activity: <input checked="" type="checkbox"/> Admin./Voter Drive <input type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support		
Mailing Address 500 White Clay Center Drive			Event Year-To-Date 22184.40		
City	State	Zip Code	ORG	Date	
Newark	DE	19711			
Purpose/Event: Postage Reimbursement			Category/Type		
Description: Postage Reimbursement			Date: 03 / 07 / 2001		
FEDERAL SHARE		+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
48.57			121.43		170.00
					Transaction ID: H4.4250

JK

A. Full Name (Last, First, Middle Initial) Cifcorp			Type of Allocated Activity: <input checked="" type="checkbox"/> Admin./Voter Drive <input type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support		
Mailing Address P.O. Box 41647			Event Year-To-Date 36962.41		
City	State	Zip Code	ORG	Date	
Philadelphia	PA	19191			
Purpose/Event: Copier			Category/Type		
Description: Copier			Date: 08 / 11 / 2001		
FEDERAL SHARE		+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
134.89			337.22		472.11
					Transaction ID: H4.4287

A. Full Name (Last, First, Middle Initial) City of Providence			Type of Allocated Activity: <input checked="" type="checkbox"/> Admin./Voter Drive <input type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support		
Mailing Address City Hall			Event Year-To-Date 1421.28		
City	State	Zip Code	ORG	Date	
Providence	RI	02903			
Purpose/Event: Taxes			Category/Type		
Description: Taxes			Date: 01 / 10 / 2001		
FEDERAL SHARE		+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
406.07			1015.19		1421.28
					Transaction ID: H4.4197

SUBTOTAL of Joint Federal and Non-Federal Activity This Page					
FEDERAL SHARE		+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
589.53			1473.84		2063.37
TOTAL This Period (last page for each line only) Federal share to 21(a)(i) and non-Federal share to 21(a)(ii)					TOTAL AMOUNT
FEDERAL SHARE					
NON-FEDERAL SHARE					
TOTAL This Period for the Non-Federal Share (used for line 31 of the detailed summary page)					

**DISBURSEMENT SCHEDULE H4 (FEC Form 3X)
JOINT FEDERAL/NON-FEDERAL ACTIVITY SCHEDULE**

NAME OF COMMITTEE (in Full)
RI Republican State Central Comm.

A. Full Name (Last, First, Middle Initial) Tim Costa			Type of Allocated Activity: <input checked="" type="checkbox"/> Admin./Voter Drive <input type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support	
Mailing Address 64 Enfield Avenue			Event Year-To-Date 28828.56	
City Providence	State RI	Zip Code 02808	IND	Date 04 / 19 / 2003
Purpose/Event Backpay			Category/Type	
Description: Backpay				

FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
142.86		357.14		500.00
Transaction ID: H4.4288				

A. Full Name (Last, First, Middle Initial) Diner's Club			Type of Allocated Activity: <input checked="" type="checkbox"/> Admin./Voter Drive <input type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support	
Mailing Address P.O. Box 6003			Event Year-To-Date 17870.52	
City The Lakes	State NV	Zip Code 89801	ORG	Date 02 / 26 / 2003
Purpose/Event Travel Reimbursement			Category/Type	
Description: Travel Reimbursement				

FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
403.41		1008.54		1411.95
Transaction ID: H4.4239				

A. Full Name (Last, First, Middle Initial) Diner's Club			Type of Allocated Activity: <input checked="" type="checkbox"/> Admin./Voter Drive <input type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support	
Mailing Address P.O. Box 6003			Event Year-To-Date 21444.40	
City The Lakes	State NV	Zip Code 89801	ORG	Date 02 / 28 / 2003
Purpose/Event Travel Reimbursement			Category/Type	
Description: Travel Reimbursement				

FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
42.71		108.79		149.50
Transaction ID: H4.4243				

SUBTOTAL of Joint Federal and Non-Federal Activity This Page				
FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
588.88		1472.47		2061.45
TOTAL This Period (last page for each line only)(Federal share to 21(a)(i) and non-Federal share to 21(a)(j))				
FEDERAL SHARE			TOTAL AMOUNT	
NON-FEDERAL SHARE				
TOTAL This Period for the Non-Federal Share (used for line 31 of the detailed summary page)				

**DISBURSEMENT SCHEDULE H4 (FEC Form 3X)
JOINT FEDERAL/NON-FEDERAL ACTIVITY SCHEDULE**

NAME OF COMMITTEE (In Full)
RI Republican State Central Comm.

A. Full Name (Last, First, Middle Initial)
Elast Bank

Mailing Address
P.O. Box 40000

City	State	Zip Code
Hartford	CT	06151

Purpose/Event:
Bank Adjustment

Description: Bank Adjustment

Type of Allocated Activity:
 Admin/Voter Drive Fundraising
 Exempt Direct Candidate Support

Event Year-To-Date
29529.56

Date: 04 / 30 / 2001

FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
200.00		500.00		700.00

Transaction ID: H4.4270

A. Full Name (Last, First, Middle Initial)
J.M Consulting

Mailing Address
117 Uphire Circle

City	State	Zip Code
Galthersburg	MD	20878

Purpose/Event:
Travel Reimbursement

Description: Travel Reimbursement

Type of Allocated Activity:
 Admin/Voter Drive Fundraising
 Exempt Direct Candidate Support

Event Year-To-Date
21284.80

Date: 02 / 28 / 2001

FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
222.53		556.33		778.86

Transaction ID: H4.4241

A. Full Name (Last, First, Middle Initial)
M.S. Ross

Mailing Address
1086 North Main Street

City	State	Zip Code
Providence	RI	02940

Purpose/Event:
Political Apparel

Description: Political Apparel

Type of Allocated Activity:
 Admin/Voter Drive Fundraising
 Exempt Direct Candidate Support

Event Year-To-Date
23521.40

Date: 04 / 09 / 2001

FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
99.00		247.50		346.50

Transaction ID: H4.4255

SUBTOTAL of Joint Federal and Non-Federal Activity This Page

FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
521.53		1303.83		1825.36

TOTAL This Period (last page for each line only) (Federal share to 21(a)(1) and non-Federal share to 21(a)(2))

FEDERAL SHARE		NON-FEDERAL SHARE		TOTAL AMOUNT

TOTAL This Period for the Non-Federal Share (used for line 31 of the detailed summary page)

NON-FEDERAL SHARE		

**DISBURSEMENT SCHEDULE H4 (FEC Form 3X)
JOINT FEDERAL/NON-FEDERAL ACTIVITY SCHEDULE**

PAGE 32 / 45
FOR LINE 21e OF FORM 3X

NAME OF COMMITTEE (In Full)
RI Republican State Central Comm.

A. Full Name (Last, First, Middle Initial) Mancini Marketing			Type of Allocated Activity: <input checked="" type="checkbox"/> Admin./Voter Drive <input type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support	
Mailing Address 206 Geno Street Suite 4			Event Year-To-Date 25947.22	
City Providence	State RI	Zip Code 02909	ORG	Date 04 08 2001
Purpose/Event: Utilities			Category/ Type	
Description: Utilities				

FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
238.65		586.82		825.47
Transaction ID: H4.4262				

A. Full Name (Last, First, Middle Initial) MBNA			Type of Allocated Activity: <input checked="" type="checkbox"/> Admin./Voter Drive <input type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support	
Mailing Address P.O. Box 15026			Event Year-To-Date 11089.04	
City Wilmington	State DE	Zip Code 19850	ORG	Date 02 02 2001
Purpose/Event: Travel Reimbursement			Category/ Type	
Description: Travel Reimbursement				

FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
365.45		913.64		1279.09
Transaction ID: H4.4221				

A. Full Name (Last, First, Middle Initial) MBNA			Type of Allocated Activity: <input checked="" type="checkbox"/> Admin./Voter Drive <input type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support	
Mailing Address P.O. Box 15026			Event Year-To-Date 20516.04	
City Wilmington	State DE	Zip Code 19850	ORG	Date 02 27 2001
Purpose/Event: Office Supplies Reimbursement			Category/ Type	
Description: Office Supplies Reimbursement				

FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
134.86		336.64		471.50
Transaction ID: H4.4238				

SUBTOTAL of Joint Federal and Non-Federal Activity This Page

FEDERAL SHARE	+	NON-FEDERAL SHARE	=	TOTAL AMOUNT
738.76		1846.90		2585.66

TOTAL This Period (last page for each line only) Federal share to 21(a)(1) and non-Federal share to 21(a)(7)

FEDERAL SHARE	NON-FEDERAL SHARE	TOTAL AMOUNT

TOTAL This Period for the Non-Federal Share (used for line 31 of the detailed summary page)

NON-FEDERAL SHARE

