



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Lewis Bart Stone, Esq., Treasurer  
New York Republican Federal  
Campaign Committee  
c/o Rogers & Wells  
200 Park Avenue  
New York, NY 10166

MAR 13 1996

Identification Number: C00055582

Reference: Amended Mid-Year Report (1/1/95-6/30/95) dated  
11/3/95

Dear Mr. Stone:

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 clarify all expenditures for "voter registration" and "get-out-the-vote". In addition, if any of the voter registration or get-out-the-vote activities referenced House or Senate candidates, they should be allocated accordingly, unless merely incidental to the overall activity. If a portion or all of these expenditures were made on behalf of federal candidates, they should be reported on Schedule B or F for Line 23 or 25 of the Detailed Summary Page, as appropriate.

-Schedule H4 of your report discloses payments of administrative/voter drive expenses which appear to reflect improper allocation ratios. Schedule H4 indicates that payments made to National Market Share, Inc. were for expenses incurred in 1994 and were therefore allocated in accordance with the 1994 ratio, however your reports fail to disclose any debts incurred during 1994. Please provide additional information to clarify the nature of these transactions.

Please note that if your non-federal account has overpaid your federal account because of this miscalculation, it will be necessary to immediately transfer these funds back to the non-federal account. While the Commission may take further legal action concerning any impermissible overpayments by the non-federal account, your prompt action will be taken into consideration.

-Your report discloses a transfer(s) to the N.Y.R.S.C. Operating Acct. which appears to be a non-federal account of your committee. 11 CFR §§106.5 and 106.6 prohibits a committee's federal account from reimbursing its non-federal account for shared allocable expenses. Also, the non-federal account is prohibited from paying the federal account's share of these expenses. These types of costs must be paid according to the allocation ratio derived from the appropriate method on Schedule H1.

If the transfer(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If your non-federal account has paid any expenditures which should have been allocated, you are advised to correct any non-compliance with 11 CFR §106.5 and 106.6 and establish procedures to insure future compliance with allocation regulations.

Although the Commission may take further legal action regarding this improper allocation activity, your prompt action will be taken into consideration.

-On Schedules H3 supporting Line 18 of the Detailed Summary Page, you have not provided the unique identifying codes of the Direct Fundraising events for which transfers were received. Please amend your report to include this missing information. 11 CFR §104.10

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include a unique identifying title or code for the payments made to U.S. Postal Service, Sprint, Alchar Printing, NYNEX, Lortech Corp., Brigar Mailing, The Mailworks, U.S. Postmaster, Nortel Communications, Times Union and MCI. 11 CFR §104.10. Please amend this report (including all affected schedules) to provide a unique identifying title or code for each PURPOSE/EVENT.

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. My local number is (202) 219-3580.

Sincerely,



Donald L. Averett  
Senior Reports Analyst  
Reports Analysis Division

9 5 0 3 0 3 3 3 3 5 2 3 0