



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

John Camp, Treasurer
South Carolina Republican Party
1508 Lady Street
Columbia, SC 29201

MAY 19 1999

Identification Number: C00034033

Reference: Amended 30 Day Post-General Report (10/15/98-11/23/98), dated 4/9/99

Dear Mr. Camp:

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 limitation on making coordinated expenditures on behalf of a candidate for the 1998 general election is \$182,606. Your reports, however, disclose coordinated expenditures made on behalf of Inglis for Senate totalling \$1,243,564, which appear to exceed the limitations under 2 U.S.C. §441a(d) (pertinent portions attached).

If the expenditures in question were incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive coordinated expenditure, you should notify the candidate and request a refund of the amount in excess of the limitation.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the candidate. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

Although the Commission may take further legal action concerning the excessive coordinated expenditures, prompt action in obtaining a refund will be taken into consideration.

-Schedule H3 of your report discloses a transfer(s)-in from a non-federal account(s) for Administrative/Voter Drive which appears to exceed the permissible amount(s) indicated by your allocation ratio for Administrative/Voter Drive. Please be advised that transfers for shared activity must not exceed the non-federal share of the joint disbursements and that these transfers must be made within a 70-day time period: no more than 10 days before or 60 days after payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of these transfers-in from the non-federal account.

The Commission recommends that you immediately transfer the total excessive amount received by your federal account 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 report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Disbursements made to support non-federal candidates should be properly disclosed on a separate Schedule B, supporting Line 29 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions from other political committees should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-2 U.S.C. §434(b)(3) requires itemization of contributions from individuals and persons other than political committees, where the aggregate total from the contributor exceeds \$200 in a calendar year. In addition, 11 CFR §104.3(a)(2)(i)(B) requires a committee to report the total amount of unitemized contributions (see Line 11(a)(ii) of the Detailed Summary Page). If a committee wishes to disclose contributions regardless of the amount contributed, the committee must separate (on separate receipt schedules) those contributors requiring itemization from those who are not required to be itemized. 11 CFR §104.3(a)(4)(i) For future filings, please submit your reports in this order.

SOUTH CAROLINA REPUBLICAN PARTY

PAGE 3

-Your report includes computer produced formats of Schedule F. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

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) 694-1130.

Sincerely,



Scott A. Francis

Reports Analyst

Reports Analysis Division

268

**SCHEDULE F
ADDENDUM**

AUTHORIZING COMMITTEE	PAYER'S NAME & ADDRESS	PURPOSE OF EXPENDITURE	CANDIDATES SUPPORTED	DATE OF PAYMENT	AMOUNT
SC Republican Party	National Media 211 N. Union Street #200 Alexandria, VA 22314	Media Services	Besley for Governor	9/10/98	\$50,000.00
SC Republican Party	Stevens Reed & Curcio 201 N. Union Street #400 Alexandria, Va. 22314	Media Services	Inglis for Senate	9/23/98	\$209,970.00
SC Republican Party	National Media 211 N. Union Street #200 Alexandria, VA 22314	Media Services	Besley for Governor	9/29/98	\$13,000.00
SC Republican Party	Stevens Reed & Curcio 201 N. Union Street #400 Alexandria, VA 22314	Issue Advertisement & Media Services	Inglis for Senate	9/30/98	\$290,744.00

AGGREGATE GENERAL ELECTION EXPENDITURE TOTALS: as of 9/30/98 \$563,714.00

Inglis for Senate \$500,714.00

Besley for Governor \$63,000.00

**SCHEDULE F
ADDENDUM**

AUTHORIZING COMMITTEE	PAYER'S NAME & ADDRESS	PURPOSE OF EXPENDITURE	CANDIDATES SUPPORTED	DATE OF PAYMENT	AMOUNT
SC Republican Party	Strategic Media 1020 N. Fairfax Street #300 Alexandria, VA. 22314	Television/Media Services	Inglis for Senate	10/2/98	\$107,000.00
SC Republican Party	National Media 211 North Union Street #200 Alexandria, VA. 22314	Radio/Media Services	Beasley for Governor	10/6/98	\$99,715.00
SC Republican Party	Conquest Communications 2238 Dabney Road Richmond, VA. 23230	Telemarketing/GOTV Calls	Spence for Congress	10/7/98	\$6,797.34
SC Republican Party	Conquest Communications 2238 Dabney Road Richmond, VA. 23230	Telemarketing/GOTV Calls	Beasley for Governor	10/8/98	\$59,024.78
SC Republican Party	Stevens, Reed & Curcio 201 N. Union Street, #400 Alexandria, VA. 22314	Media Services	Inglis for Senate	10/9/98	\$269,695.00
SC Republican Party	Alhus Group 211 N. 13 th Street Philadelphia, PA. 19107	Media Services	Beasley for Governor	10/13/98	\$300,000.00
AGGREGATE GENERAL ELECTION EXPENDITURE TOTALS:		as of 10/14/98	\$1,415,946.12		
Inglis for Senate	\$677,409.00				
Beasley for Governor	\$531,739.78				
Spence for Congress	\$6,797.34				

**SCHEDULE F
ADDENDUM**

AUTHORIZING COMMITTEE	PAYER'S NAME & ADDRESS	PURPOSE OF EXPENDITURE	CANDIDATES SUPPORTED	DATE OF PAYMENT	AMOUNT
SC Republican Party	Conquest Communications 2238 Dabney Road Richmond, VA. 23230	Telemarketing GOTV calls	Beasley for Governor	10/15/98	\$59,670.00
SC Republican Party	Stevens, Reed & Curcio 201 N. Union Street, #400 Alexandria, VA. 22314	Issue Advertisement	Inglis for Senate	10/19/98	\$16,355.00
SC Republican Party	Almas Group 211 N. 13 th Street Philadelphia, PA. 19107	Issue Advertisement	Beasley for Governor	10/19/98	\$200,000.00
SC Republican Party	Stevens, Reed & Curcio 201 N. Union Street, #400 Alexandria, VA. 22314	Issue Advertisement	Inglis for Senate	10/19/98	\$279,145.00
SC Republican Party	Conquest Communications 2238 Dabney Road Richmond, VA. 23230	Telemarketing Advocacy Calls	Beasley for Governor	10/22/98	\$15,330.90
SC Republican Party	Conquest Communications 2238 Dabney Road Richmond, VA. 23230	Telemarketing Advocacy Calls	Beasley for Governor	10/26/98	\$11,354.85
SC Republican Party	Stevens, Reed & Curcio 201 N. Union Street, #400 Alexandria, VA. 22314	Issue Advertisement	Inglis for Senate	10/28/98	\$70,655.00
SC Republican Party	Kirchen Agency P.O. Box 7038 Florence, SC 29502	Radio Advertisements	Beasley for Governor	10/27/98	\$2,350.00
AGGREGATE GENERAL ELECTION EXPENDITURE TOTALS:			\$2,878,886.87	as of 11/23/98	
Inglis for Senate	\$1,243,564.00				
Beasley for Governor	\$820,445.50				
Spence for Congress	\$6,797.34				

