



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 12 Day Pre-General Report (10/1/98-10/14/98), 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 \$877,409, 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.

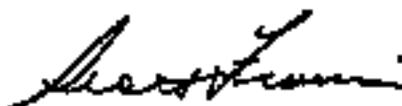
The Commission recommends that you immediately transfer the total excessive amount received by your federal account back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Schedules F and H4 disclose 100% non-federal activity. Please be advised that by definition, this activity does not qualify as a shared expense to be allocated between your federal and non-federal accounts. This activity should be itemized on a Schedule B for Line 29 of the Detailed Summary Page. Any reimbursement from your committee's non-federal account for any portion of this activity is not permissible and must be returned. Please amend your report to clarify this discrepancy.

-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.

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

**SCHEDULE F  
ADDENDUM**

AUTHORIZING COMMITTEE	PAYER'S NAME & ADDRESS	PURPOSE OF EXPENDITURE	CANDIDATES SUPPORTED	DATE OF PAYMENT	AMOUNT
SC Republican Party	Strategic Media 10210 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	Bassley for Governor	10/6/98	\$99,715.00
SC Republican Party	Conquest Communications 2238 Debary Road Richmond, VA. 23230	Telemarketing/GOTV Calls	Spence for Congress	10/7/98	\$6,797.34
SC Republican Party	Conquest Communications 2238 Debary Road Richmond, VA. 23230	Telemarketing/GOTV Calls	Bassley for Governor	10/8/98	\$69,024.78
SC Republican Party	Stevens, Reed & Curcio 201 N. Union Street, #400 Alexandria, VA. 22314	Media Services	Inglis for Senate	10/9/98	\$269,693.00
SC Republican Party	Albus Group 211 N. 13 <sup>th</sup> Street Philadelphia, PA. 19107	Media Services	Bassley 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	\$877,489.00
Bassley for Governor	\$531,739.78
Spence for Congress	\$6,797.34

**SCHEDULE F  
ADDENDUM**

AUTHORIZING COMMITTEE	PAYEE'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 663,000.00

