



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

RQ-2

Margaret C. Coughlin, Treasurer
Rhode Island Republican State
Central Committee
18 Bridge Street
Providence, RI 02903

MAR 19 1997

Identification Number: C00078196

Reference: 12 Day Pre-General Report (10/1/96-10/16/96)

Dear Ms. Coughlin:

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:

-Schedule D supporting Line 10 of the Summary Page discloses debts owed to your non-federal account totalling \$8,041.79. 11 CFR §§106.5 and 106.6 requires that all shared expenses be paid from the federal account and allows the non-federal account to transfer-in its share of the expense no more than 10 days before or 60 days after payment by the federal account.

The outstanding debt owed to your non-federal account must be paid immediately, as it represents a subsidization of federal activity by your non-federal account. Such activity is a violation of 11 CFR §102.5.

Although the Commission may take further legal steps concerning this prohibited activity, your prompt payment of the debt 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

**RHODE ISLAND REPUBLICAN STATE CENTRAL COMMITTEE
PAGE 2**

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 **Administrative/Voter Drive EVENT YEAR-TO-DATE** totals.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to check the appropriate **CATEGORY** box for the payment(s) made to Providence Marriott. Please amend your report to disclose the appropriate category.

-Your report discloses limited payments for administrative expenses. Each 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** submitted each year. 11 CFR §106.5(d)

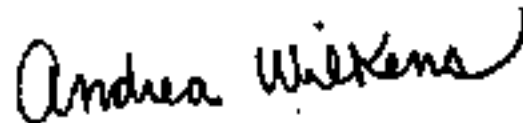
Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions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

Clarification regarding administrative expenses should be disclosed 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.

RHODE ISLAND REPUBLICAN STATE CENTRAL COMMITTEE
PAGE 3

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,



Andrea Wilkens
Reports Analyst
Reports Analysis Division

266

3

