



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Jonathan Wheeler, Treasurer  
Rhode Island Republican Party  
643 East Avenue  
Warwick, RI 02886

JUN 26 2002

Identification Number: C00078196

Reference: Year End Report (7/1/01-12/31/01)

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:

-The beginning cash balance of this report should equal the ending balance of your Mid-Year Report (1/1/01-6/30/01). Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Line 6(a) of the Summary Page represents the total cash-on-hand as of January 1, 2001. This figure should be the same on all the reports covering the calendar year. Please amend your report to clarify the change made in Line 6(a).

-The totals listed on Lines 6(c), 7, 11(a)(iii), 11(b), 15, 18, 21(a)(i), 21(a)(ii), and 21(b), Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-Your calculations for Lines 11(d), 19, 20, 21(c), 30, 31, Column B appear to be incorrect. Please provide the corrected totals on the Detailed Summary Page.

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-The outstanding balance of a debt owed to a creditor at the close of one report should be exactly the same as the outstanding balance beginning the period of the next report. This report shows a beginning outstanding balance(s) to Tim Costa, Halsey Properties, JLM Consulting, Kentish Guards, Richard Kizarian, and Ralph Stuart Band, which is not identical to the ending outstanding balance(s) for the creditor(s) on the Mid-Year Report (1/1/01-6/30/01). Please amend your report to clarify the discrepancy.

-On Schedule D of your previous report, you disclosed a debt(s) owed to Advanced Mailing Services, Tim Bonin, Cogen's Printing, Direct Mail Services, Providence Marriott Hotel, Rep. Joan Quick, and Norma Willis. 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

-Schedule A of your report (pertinent portion(s) attached) discloses a receipt(s) of \$26,028.39 from the Rhode Island Republican Party. Please clarify whether this transfer(s) is from an account maintained by your committee for non-federal activity. If so, be advised that such a transfer is prohibited by 11 CFR §102.5(a)(1)(i) and the full amount of the transfer(s) should be returned to the non-federal account. Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on Schedule B supporting Line 22 of your next report.

If this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the impermissible funds or clarification of the transaction, will be taken into consideration.

-Schedule H4 of your report discloses a payment to Joseph Perkala for "Reimbursement-Print for Gov. Rowland". Please be advised that contributions to federal committees and/or non-federal committees/organizations do not qualify as shared expenses to be allocated between

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your federal and non-federal accounts. Contributions to federal committees should be disclosed on a Schedule B supporting Line 23 of the Detailed Summary Page and contributions to non-federal committees/organizations on a separate Schedule B supporting Line 29. Any reimbursement from your committee's non-federal account for any portion of this contribution(s) is not permissible. 11 CFR §102.5(a)(1)(i)

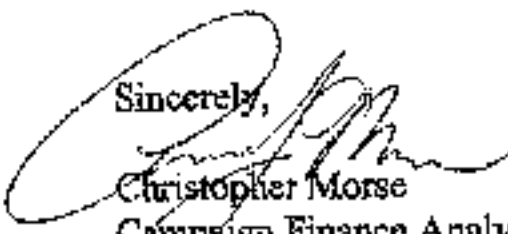
The Commission recommends that you immediately transfer the funds received by your federal account, as reimbursement for the non-federal portion, back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken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

-Your 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 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 EVENT YEAR-TO-DATE totals.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): consulting fee and event exp. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

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,

  
Christopher Morse  
Campaign Finance Analyst  
Reports Analysis Division

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

Use separate schedule(s)  
or each category of the  
Detailed Summary Page

FOR LINE NUMBER:		PAGE 13 / 38	
(check only one)			
<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input checked="" type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
			<input type="checkbox"/> 17

Any information copied from such Reports and Statements may not be used or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)  
Rhode Island Republican Party

Full Name (Last, First, Middle Initial) A. Rhode Island Republican Party		Date of Receipt MM / DD / YYYY 09 / 17 / 2001
Mailing Address 551 South Main Street City: Providence State: RI Zip Code: 02903		Amount of Each Receipt this Period 21028.39 <i>CM</i>
FEC ID number of contributing federal political committee: C00078196		
Name of Employer	Occupation	Transfer from State
Receipt For: Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 21028.39	Transaction ID: SA12.4145

Full Name (Last, First, Middle Initial) B. Rhode Island Republican Party		Date of Receipt MM / DD / YYYY 12 / 21 / 2001
Mailing Address 551 South Main Street City: Providence State: RI Zip Code: 02903		Amount of Each Receipt this Period 5000.00 <i>CM</i>
FEC ID number of contributing federal political committee: C00078196		
Name of Employer	Occupation	Transfer from State Acct.
Receipt For: Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 26028.39	Transaction ID: SA12.4144

Full Name (Last, First, Middle Initial) C. RNC		Date of Receipt MM / DD / YYYY 07 / 13 / 2001
Mailing Address 310 First Street, S.E. City: Washington State: DC Zip Code: 20003		Amount of Each Receipt this Period 10000.00
FEC ID number of contributing federal political committee: C00003418		
Name of Employer	Occupation	Transfer-Party Building
Receipt For: Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 10000.00	Transaction ID: SA12.4146

SUBTOTAL of Receipts This Page (optional)	38028.39
TOTAL This Period (next page this line number only)	36028.39

2025.07.23.03.03.03