



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

RQ-3

December 5, 2002

Ron Pollock, Treasurer
Idaho Republican Party
P.O. Box 2267
Boise, ID 83701

Identification Number: C00170175

Reference: July Quarterly Report (4/1/02-6/30/02)

Dear Mr. Pollock:

This letter is to inform you that as of December 4, 2002, the Commission has not received your response to our request for additional information, dated November 13, 2002. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

An adequate response must be received at the Commission by December 25, 2002. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

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 should have any questions regarding this matter, please contact Kristen Davis on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

RQ-2

Ron Pollock, Treasurer
Idaho Republican Party
P.O. Box 2267
Boise, ID 83701

NOV 13 2002

Identification Number: C00170175

Reference: July Quarterly Report (4/1/02-6/30/02)

Dear Mr. Pollock:

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 A of your report (pertinent portion(s) attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

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Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-The totals listed on Lines 11(a)(iii), 11(d), 19, 20, 21(a)(i), 21(a)(ii), 21(b), 21(c), 30, and 31, Column B of the 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 6(c) and 7, Column B appear to be incorrect. FEC calculations disclose these amounts to be \$319,033.23 and \$252,006.82, respectively. Please provide the corrected totals on the Summary Page.

-Your calculations for Line 8 appear to be incorrect. Cash-on-hand at the close of the current reporting period should always equal the closing calendar year-to-date cash-on-hand amount. Please provide the corrected total on the Summary Page.

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-Schedule B supporting Line 29 (pertinent portion(s) attached) discloses \$28,293.00 in disbursements to "Idaho Republican Party" for "move nonfed funds back to state act" and "Joint fundraising event". You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information regarding these transactions including the date(s) when the original activity was conducted by the non-federal account. In addition, if any of the disbursements disclosed were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in-kind contributions on Schedule B supporting Line 23, independent expenditures on Schedule E supporting Line 24, or as coordinated expenditures on Schedule F supporting Line 25. 11 CFR §§104.3(b)(3) and 106.1

Although the Commission may initiate legal action regarding the activities conducted by your non-federal account, any clarifying information that you can provide will be taken into consideration.

-Your report includes multiple Schedule H1s with varying methods of allocation. One Schedule H1 has section A (Fixed Federal Percentage) checked. The other Schedule H1 has section D (Ballot Composition) completed with a federal percentage of 28.57% on each one. Please be advised that a state party committee should only submit one Schedule H1 with section D completed. Please amend your report to clarify these apparent discrepancies.

-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): "Reimbursement ADMINISTRATION" and "misc. expense". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule(s) H4 of your report discloses lump sum payments to "Team America Human Resources" for payroll purposes; however, you have not itemized the individuals who receive payment. Each person who provided services to the committee must be identified in a memo entry if the payments made through the payroll account to the ultimate payee exceed \$200 in a calendar year. Please amend your report by providing the name, date, amount, and purpose for such payments as required by 11 CFR §102.9(b)(2)(i)(A).

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-Schedule H4 of your report appears to disclose disbursements associated with fundraising activities/events that have been incorrectly categorized as Administrative/Voter Drive expenses. Payments made for expenses relating to committee fundraising must adhere to the following reporting requirements:

- 1) A committee which allocates the costs of fundraising events between its federal and non-federal accounts is required to allocate the costs directly associated with a fundraising program or event according to the "funds-received" method. The fundraising ratio shall be estimated prior to each fundraising event based on the committee's reasonable prediction of its federal and nonfederal revenue from that event. The estimated percentage of federal funds received to nonfederal funds received for a fundraising event must be disclosed on a Schedule H2 with a unique identifier code and included with each report disclosing a disbursement for that event or program.
- 2) Any transfer received from you nonfederal account for the nonfederal account's share of fundraising expenses must be disclosed on a Schedule H3 identifying the date of receipt, amount, fundraising event and unique identifier code.
- 3) All disbursements for fundraising expenses which have been allocated between the federal and nonfederal accounts must be categorized as fundraising disbursements on Schedule H4. The date of disbursement, purpose of disbursement, unique identifier code, event year-to-date total and both the federal and nonfederal shares of the disbursement must also be provided.
- 4) The committee has up to 60 days after the ending date of the event to adjust the estimated allocation ratio based on the actual funds received.
 - a) The committee must report the adjusted ratio for the fundraising event on Schedule H2 and date of the fundraising event.
 - b) If the adjusted ratio increases the federal portion of the fundraising ratio the federal account must make a transfer to the nonfederal account for any nonfederal over-payment of fundraising expenses on Schedule H4.

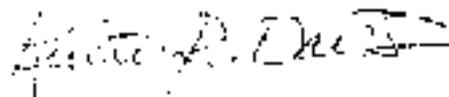
Please amend your report to properly disclose the payments made for "Fundraising Letter" on Schedule H4.

IDAHO REPUBLICAN PARTY
PAGE 5

-Please be advised that the ballot composition ratio for allocation of administrative and generic voter drive expenses should be the same for state party committees in the same state. Schedule H1 of your report discloses the federal portion of administrative and generic voter drive expenses to be 28.57%. The federal portion is calculated by checking all the offices that will appear on the next general election ballot and dividing the points for federal offices by the total points for all offices. Please verify that your Schedule H1 adequately reflects what will appear on the next general election ballot. If necessary, please amend your report to include a corrected H1.

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,



Kristen R. Davis
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 83 / 120
(check only one)

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input checked="" type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 17
13	14	15	16	

Any information copied from such Reports and Statements may not be sold 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)
Idaho Republican Party

A. Full Name (Last, First, Middle Initial)
U. S. Senate Craig

Mailing Address
PO Box 2754
City State Zip Code
Boise ID 83701-2754

Date of Receipt
M M / D D / Y Y Y Y
05 / 07 / 2002

Amount of Each Receipt This Period
2080.00

Receipt

FEC ID number of contributing federal political committee.

Name of Employer Occupation
Receipt For: Primary General Other (specify) ▼ Aggregate Year-to-Date ▼
2080.00

Transaction ID: 0507200220C10031250

B. Full Name (Last, First, Middle Initial)
U. S. Senate Craig

Mailing Address
PO Box 2754
City State Zip Code
Boise ID 83701-2754

Date of Receipt
M M / D D / Y Y Y Y
05 / 23 / 2002

Amount of Each Receipt This Period
2080.00

Receipt

FEC ID number of contributing federal political committee.

Name of Employer Occupation
Receipt For: Primary General Other (specify) ▼ Aggregate Year-to-Date ▼
4180.00

Transaction ID: 0529200230C101090251

C. Full Name (Last, First, Middle Initial)
U. S. Senate Craig

Mailing Address
PO Box 2754
City State Zip Code
Boise ID 83701-2754

Date of Receipt
M M / D D / Y Y Y Y
06 / 20 / 2002

Amount of Each Receipt This Period
2080.00

Receipt

FEC ID number of contributing federal political committee.

Name of Employer Occupation
Receipt For: Primary General Other (specify) ▼ Aggregate Year-to-Date ▼
6240.00

Transaction ID: 0701200254C101458252

SUBTOTAL of Receipts This Page (optional) ▶ 8240.00

TOTAL This Period (last page this line number only) ▶

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)								PAGE 86 / 120
	<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b

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NAME OF COMMITTEE (in Full)
Idaho Republican Party

A. Full Name (Last, First, Middle Initial) Idaho Republican Party			Date of Disbursement M O N T H D A Y Y Y Y Y 0 5 2 6 2 0 0 2		
Mailing Address PO Box 2267			Amount of Each Disbursement this Period 22327.30		
City Boise	State ID	Zip Code 83701-2267	Category/ Type		
Purpose of Disbursement move nonfund funds back to state acct					
Candidate Name			Transaction ID: 0701200256E5928		
Office Sought: House Senate President	Disbursement For: Primary General Other (specify) ▼		State: District:		

B. Full Name (Last, First, Middle Initial) Idaho Republican Party			Date of Disbursement M O N T H D A Y Y Y Y Y 0 5 1 0 2 0 0 2		
Mailing Address PO Box 2267			Amount of Each Disbursement this Period 5966.49		
City Boise	State ID	Zip Code 83701-2267	Category/ Type		
Purpose of Disbursement Joint fundraising event					
Candidate Name			Transaction ID: 052920025E5876		
Office Sought: House Senate President	Disbursement For: Primary General Other (specify) ▼		State: District:		

C.

* SUBTOTAL of Disbursements This Page (optional)	28293.79
TOTAL This Period (last page this line number only)	28293.79

德意志銀行