



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

DEC 10 1997

Joe R. Arnold, Treasurer
Tennessee Republican Party Federal
Election Account Victory '96
P.O. Box 150368
Nashville, TN 37215

Identification Number: C00040220

Reference: Mid-Year Report (1/1/97-6/30/97)

Dear Mr. Arnold:

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 1996 Year End Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-You must make an attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may demonstrate "best efforts" to obtain the required information by providing the Commission with a description of its procedures for requesting the information and may also supply a copy of a solicitation: the committee must request the contributor information in initial solicitations; make follow-up requests (if necessary); report the information; and file amendments to disclose previously unreported information. Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make an additional written or oral request for the

information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle. Furthermore, if a committee receives contributor information after the contributions have been reported, it must submit, with its next report, an amended memo Schedule A listing all the contributions for which additional information was received or file, on or before the next reporting date, amendments to the previous reports on which the contributions were originally disclosed. See 11 CFR §104.3(a)(4)(i) and 11 CFR §104.7.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Your report does not include a Schedule H1 to disclose the ratio for the allocation of administrative and generic voter drive costs. This ratio is determined at the beginning of each two-year election cycle. All shared administrative and generic voter drive costs incurred during the two-year cycle must be allocated according to this ratio, unless the federal account elects to pay a higher percentage of its cost. 11 CFR §106.5(b)(2), (d)(1), (d)(2) and 11 CFR §§104.10(b)(1)(ii)(B) and 106.6(c)

-Please provide a Schedule H3 to support the entry reported on Line 18 of the Detailed Summary Page. All transfers received from a committee's non-federal account for joint activity must be itemized on Schedule H3 regardless of the amount transferred. 2 U.S.C. §434(b)(3)(D)

-Please provide a Schedule B to support the entry reported on Line 22 of the Detailed Summary Page. Each transfer-out to an affiliated committee must be itemized on Schedule B regardless of the amount transferred. 2 U.S.C. §434(b)(6)(B)(i)

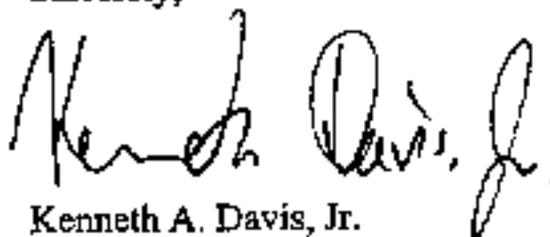
-Please provide a Schedule B to support the entry reported on Line 23 of the Detailed Summary Page. Each contribution made to a federal candidate or committee must be itemized on Schedule B regardless of the amount contributed. 11 CFR §104.3(b)(3)(v)

-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 several vendors. Please amend your report to disclose the appropriate category.

-Your report includes computer produced formats of Schedule H4. 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) 219-3580.

Sincerely,



Kenneth A. Davis, Jr.
Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

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

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FOR LINE NUMBER

11.a.i.

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)

Tennessee Republican Party Federal Election Account - Victory '96

A. Full Name, Mailing Address and ZIP Code Mr. and Mrs. David Edwards P.O. Box 139 Waynesboro, TN 38485	Name of Employer Info Requested	Date (month, day,year) 05/10/97	Amount of Each Receipt this Period \$300.00
	Occupation Info Requested		
Receipt For: Federal	Aggregate Year-to-Date >	\$300.00	
B. Full Name, Mailing Address and ZIP Code Mr. and Mrs. Douglas Daugherty 611 Signal Mountain Boulevard Signal Mountain, TN 37377	Name of Employer Info Requested	Date (month, day,year) 05/12/97	Amount of Each Receipt this Period \$1,500.00
	Occupation Info Requested		
Receipt For: Federal	Aggregate Year-to-Date >	\$1,500.00	
C. Full Name, Mailing Address and ZIP Code Mr. Jack Jarvis 205 Cherokee Street P.O. Box 1465 Kingsport, TN 37662	Name of Employer Info Requested	Date (month, day,year) 05/12/97	Amount of Each Receipt this Period \$300.00
	Occupation Info Requested		
Receipt For: Federal	Aggregate Year-to-Date >	\$300.00	
D. Full Name, Mailing Address and ZIP Code Ms. Jennifer Lawson Route 3, Box 100 Rogersville, TN 37857	Name of Employer Info Requested	Date (month, day,year) 05/16/97	Amount of Each Receipt this Period \$300.00
	Occupation Info Requested		
Receipt For: Federal	Aggregate Year-to-Date >	\$300.00	
E. Full Name, Mailing Address and ZIP Code Campbell County Republican Party Ann Ayers 202 Lake Lane Caryville, TN 37714	Name of Employer Info Requested	Date (month, day,year) 05/16/97	Amount of Each Receipt this Period \$2,700.00
	Occupation Info Requested		
Receipt For: Federal	Aggregate Year-to-Date >	\$2,700.00	
F. Full Name, Mailing Address and ZIP Code Committee to El Mark Norris P.O. Box 381075 Germantown, TN 38183	Name of Employer Info Requested	Date (month, day,year) 05/17/97	Amount of Each Receipt this Period \$1,500.00
	Occupation Info Requested		
Receipt For: Federal	Aggregate Year-to-Date >	\$1,500.00	
G. Full Name, Mailing Address and ZIP Code Dr. and Mrs. James Turner 976 Vineyard Point Road Sequatchie, TN 37374	Name of Employer Info Requested	Date (month, day,year) 05/24/97	Amount of Each Receipt this Period \$1,500.00
	Occupation Info Requested		
Receipt For: Federal	Aggregate Year-to-Date >	\$1,500.00	

SUBTOTAL of Receipts This Page (optional)

\$8,100.00

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

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

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FOR LINE NUMBER 11.c.

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NAME OF COMMITTEE (In Full)
Tennessee Republican Party Federal Election Account - Victory '96

A. Full Name, Mailing Address and ZIP Code <i>Police Benevolence PAC</i> Mr. Steve Helton 1517 Southlake Parkway Morrow, GA 30260	Name of Employer	Date (month, day, year) 06/04/97	Amount of Each Receipt this Period \$1,500.00
	Occupation		
Receipt For: Federal	Aggregate Year-to-Date >		\$1,500.00
B. Full Name, Mailing Address and ZIP Code <i>American General PAC</i> Mr. Marcue Bergh, Jr. 2929 Allen Parkway Houston, TX 77019	Name of Employer	Date (month, day, year) 06/18/97	Amount of Each Receipt this Period \$1,500.00
	Occupation		
Receipt For: Federal	Aggregate Year-to-Date >		\$1,500.00
C. Full Name, Mailing Address and ZIP Code <i>Glaxo Wellcome PAC</i> Mr. Gary Blalack 513 Cherrywood Point Franklin, TN 37064	Name of Employer	Date (month, day, year) 06/23/97	Amount of Each Receipt this Period \$3,000.00
	Occupation		
Receipt For: Federal	Aggregate Year-to-Date >		\$3,000.00
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For:	Aggregate Year-to-Date >		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For:	Aggregate Year-to-Date >		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For:	Aggregate Year-to-Date >		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For:	Aggregate Year-to-Date >		

SUBTOTAL of Receipts This Page (optional)	\$6,000.00
TOTAL This Period (last page this line number only)	\$39,700.00

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 2 OF 4

FOR LINE NUMBER

11.c.

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NAME OF COMMITTEE (In Full)

Tennessee Republican Party Federal Election Account - Victory '96

A. Full Name, Mailing Address and ZIP Code Friends of TN Hospitals PAC 500 Interstate Boulevard, South Nashville, TN 37210	Name of Employer	Date (month, day, year) 05/14/97	Amount of Each Receipt this Period \$1,500.00
	Occupation		
Receipt For: Federal	Aggregate Year-to-Date >	\$1,500.00	
B. Full Name, Mailing Address and ZIP Code Shoney's Restaurant PAC 1727 Elm Hill Pike Nashville, TN 37210	Name of Employer	Date (month, day, year) 06/05/97	Amount of Each Receipt this Period \$500.00
	Occupation		
Receipt For: Federal	Aggregate Year-to-Date >	\$500.00	
C. Full Name, Mailing Address and ZIP Code TN Road Builders Assoc. PAC 217 6th Ave N Nashville, TN 37219	Name of Employer	Date (month, day, year) 06/04/97	Amount of Each Receipt this Period \$1,500.00
	Occupation		
Receipt For: Federal	Aggregate Year-to-Date >	\$1,500.00	
D. Full Name, Mailing Address and ZIP Code TN Realtors PAC P.O. Box 121149 ATTN: Ms. Linda Woods Nashville, TN 37212	Name of Employer	Date (month, day, year) 06/06/97	Amount of Each Receipt this Period \$1,500.00
	Occupation		
Receipt For: Federal	Aggregate Year-to-Date >	\$1,500.00	
E. Full Name, Mailing Address and ZIP Code Union Planters PAC Post Office Box 387 Memphis, TN 38147	Name of Employer	Date (month, day, year) 06/07/97	Amount of Each Receipt this Period \$1,500.00
	Occupation		
Receipt For: Federal	Aggregate Year-to-Date >	\$1,500.00	
F. Full Name, Mailing Address and ZIP Code Bellsouth Employees Tennessee Mr. Jim Spears 333 Commerce St., Suite 2102 Nashville, TN 37201	Name of Employer	Date (month, day, year) 03/31/97	Amount of Each Receipt this Period \$3,000.00 \$900.00
	Occupation	06/02/97	
Receipt For: Federal	Aggregate Year-to-Date >	\$3,900.00	
G. Full Name, Mailing Address and ZIP Code Bass Berry & Sims PAC 1st American Center, 27th Floor Nashville, TN 37238	Name of Employer	Date (month, day, year) 05/22/97	Amount of Each Receipt this Period \$1,500.00
	Occupation		
Receipt For: Federal	Aggregate Year-to-Date >	\$1,500.00	

SUBTOTAL of Receipts This Page (optional)

\$11,900.00

TOTAL This Period (last page this line number only)

97-03-253-2464