



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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John Kirincich, Treasurer
Georgia Federal Elections Committee
1100 Spring Street Suite 710
Atlanta, GA 30309

JAN 16 2002

Identification Number: C00041269

Reference: Mid-Year Report (1/1/01-6/30/01)

Dear Mr. Kirincich:

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 Detailed Summary Page, on Line 18 Column A of your report, discloses \$989,077.47 in transfers from the non-federal account for joint activity for the reporting period. However, Line 21 (a)(ii) Column A discloses \$828,933.83 as the non-federal share for joint activity for the reporting period. While the non-federal account is permitted to transfer funds to the federal account for shared activity, transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of the transfers-in from the non-federal account.

The Commission recommends that you immediately transfer back to the non-federal account, the total excessive amount which was received by your federal account outside the 70-day time period. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Please be advised that the ballot composition ratio for allocation of administrative and generic voter drive expenses should be the same for state

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party committees in the same state. Schedule H1 of your report discloses the federal portion of administrative and generic voter drive expenses to be 25%. 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.

-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): "production costs". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Your report discloses memo item entries on Schedule A, 11(a)(i) totaling \$3,011.50 from an unidentified joint fundraiser. However, there are no corresponding transfers-in from this committee disclosed on Schedule A for supporting Line 12 of the Detailed Summary Page. Please clarify this apparent discrepancy and identify the joint fundraising committee.

-Schedule H4 of your report discloses payments for "petty cash." Please be advised that a political committee may maintain a petty cash fund out of which it may make expenditures not in excess of \$100 to any person per purchase or transaction. 11 CFR §102.11. Please provide clarifying information regarding these transactions.

-You have received a contribution from Alston & Bird, LLP, which appears to be an unincorporated proprietorship or partnership. Generally, these types of contributions are to be attributed to each person based on their percentage of ownership in the firm. Each person who has contributed in excess of \$200 since January 1 should be identified by name, address, occupation, name of employer, amount of contribution, and aggregate total on Schedule A. 11 CFR §110.1(k) Please amend your report by providing the omitted information.

A 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. Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the

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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,

A handwritten signature in black ink, appearing to read "Alice Kang", with a long horizontal flourish extending to the right.

Alice Kang
Reports Analyst
Reports Analysis Division

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