

 **Rhode Island
Republican Party**

551 SOUTH MAIN STREET
PROVIDENCE, R.I. 02903

PHONE: (401) 453-4100 • FAX: (401) 453-0066

RECEIVED
FEC MAIL ROOM

2000 JUN 21 P 1:17

Joan B. Quick, Chairman

June 18, 2000

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Sirs:

This letter is in response to your two letters dated June 14, 2000 requesting information about our 1999 reports. Both letters ask about the transfers from our non-federal account to our federal account to cover the non-federal account's share of expenses.

At the completion of every month we calculate by hand the amount the non-federal account owes and the amount it has transferred into the federal account so that we know the correct balance that our non-federal account owes, along with when it must be paid by. We are very careful to insure that all of our transfers take place within the 60 days allowable period after expenses are paid. As you know, reports that are due on a quarterly and semi annual basis (as well as the pre and post election reports) will cause an overlap between the time an expense is paid and reported on one report and the time a transfer is made and will be reported on another report. We have rechecked our records to make sure that our calculations are correct and they are. While we see where there may be confusion, we are certain that our numbers are not in error.

As for your question regarding the amount reported owed to Joan Quick as of December 31, 1999 it seems your letter is in error. The outstanding balance we report is \$16,150 (not the \$18,600 your letter states). I believe the discrepancy between our figures and yours is in the fact that Schedule D shows the amount of gross pay owed to Joan Quick, while our schedule H4 payments to her are shown in two parts. One, the net pay she receives, which is shown as a payment to her, and two, the taxes withheld along with the committee's share of payroll taxes, which is shown as a payment to Paychex.

If you have any further questions please do not hesitate to call me at 453-4100.

Sincerely,


Margaret C. Coughlin
Treasurer



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Margaret C. Coughlin, Treasurer
R ! Republican Party
551 South Main Street
Providence, RI 02903

Identification Number: C00078196

Reference: Year End Report (7/1/99-12/31/99)

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 discloses the outstanding balance at the close of the period for the debt owed to Joan Quick to be \$18,600. FEC calculations disclose this amount to be \$15,539. Please amend your report to clarify this discrepancy.

-The Detailed Summary Page, on Line 18 Column A of your report, discloses \$29,865.36 in transfers from the non-federal account for joint activity for the reporting period. However, Line 21 (a)(ii) Column A discloses \$28,288.22 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(c)(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.

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 (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 "Scott Walker", written in a cursive style.

Scott Walker
Reports Analyst
Report Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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PUBLIC DISCLOSURE
DIVISION

Jun 21 2 29 PM '00

Margaret C. Coughlin, Treasurer
R I Republican Party
551 South Main Street
Providence, RI 02903

Identification Number: C00078196

JUN 21 2000

Reference: Mid-Year Report (1/1/99-6/30/99)

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:

-The Detailed Summary Page, on Line 18 Column A of your report, discloses \$42,300 in transfers from the non-federal account for joint activity for the reporting period. However, Line 21 (a)(ii) Column A discloses \$17,208.16 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.

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 (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 "Scott Walker", written over a horizontal line.

Scott Walker
Reports Analyst
Report Analysis Division

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Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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