



NEW YORK  
REPUBLICAN  
COUNTY COMMITTEE

JAMES A. ORTENZIO  
Chairman and  
Chief Executive Officer

January 27, 2006

MARCUS CEDERQVIST  
Executive Director

Mr. Christopher J. Morse  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street N.W.  
Washington, DC 20463

Re: Identification No. C00176834  
New York Republican County Committee  
Amended April Report (3/1/05 - 3/31/05)

RECEIVED  
FEC MAIL  
OPERATIONS CENTER  
2006 JAN 30 A 10:31

Dear Mr. Morse:

This letter responds to your letter of December 30, 2005 concerning the above-referenced filing. We have reviewed the transfers in the first half of 2005 and can respond as follows: What may appear to have been over-transfers from our non-federal accounts to our federal allocation account are explained as follows: (1) two transfers (3/3/05 and 3/4/05) were in excess of the amounts ultimately determined to be appropriately allocable to the non-federal account because of changes in the ratios for the Lincoln Day Dinner fund-raising event from the time the original transfer amounts were estimated to the time when the ratios were re-computed based on the proportion of receipts for this fundraiser from non-federal accounts versus federal account; and (2) one transfer (\$10,000 on 3/7/05) was made in anticipation of Lincoln Day Dinner expenses that then unexpectedly were not paid. Compensating adjustments were made to reduce subsequent transfers from the non-federal accounts so that the over-transfers were effectively reversed in the following two months, as shown in the attached schedule.

As we have previously advised the FEC staff in prior correspondence (e.g., our letter of January 31, 2003), we maintain a separate allocation checking account as part of our overall federal account. Thus, the money deposited into this separate checking account used for payment of allocable operating expenditures does not get commingled with other federal funds but simply gets used for ongoing allocable operating expenditures. (We do not distinguish between the activity in our federal checking account and the separate allocation checking account in our federal report filings with the FEC because, when we first established this system, we were advised by FEC representatives that, while it was perfectly fine to have a separate checking account used to receive and pay out monies for allocable operating expenses (in accordance with the applicable ratios), only one FEC report should be filed to reflect the combined activity in both checking accounts. The separate allocation checking account is used by us for administrative convenience and to avoid any possible issue of commingling non-federal funds used for the non-federal share of operating expenditures with federal funds that may be used for federal elec-



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tion purposes.) Furthermore, we note that the principal focus of our committee has been and continues to be participation in campaigns for state (not federal) office.

We note that (i) any monies received into our allocation checking account are only used for allocable expenditures, (ii) we already promptly corrected the overtransfers in 2005 (as described above), and (iii) it is sometimes difficult to precisely gauge allocation amounts for fund raising expenses (as to which the allocation ratio may fluctuate or, as occurred here, planned expenditures get cancelled after the anticipatory transfer to cover them is made).

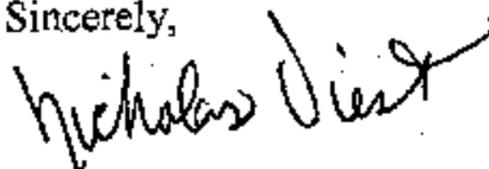
In light of all of the foregoing, we do not believe any further action on our part should be necessary — the overtransfers have already been corrected. However, if you still believe some action is necessary, please advise us so we can focus on this further.

A memo entry summarizing the foregoing and referring to this letter was submitted in an amended report on January 27, 2006.

Finally, we responded to your letter dated December 30, 2005 concerning our February monthly report (1/1/05 - 1/31/05) by filing an amended report attaching a schedule H-1, which we believe complies with your request.

Please call us at 212-517-8444 if you have any further questions.

Sincerely,



Nicholas D. Viest, Treasurer

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**Analysis of transfers  
to Allocation Account 1/1/05 - 6/30/05**

<u>Date of Transfer</u>	<u>Amount</u>	<u>Expenses Going back 60 days</u>	<u>Expenses Going forward 10 days</u>	<u>2004 G&amp;A Ratio 64%</u>	<u>2005 G&amp;A Ratio 79%</u>	<u>2005 LDD Ratio 82.56%</u>	<u>Applied</u>	<u>Net</u>	
01/04/05	6,285.52	9,821.13		6,285.52			7,146.46	0.02	
01/27/05	860.94	1,345.24		860.95					
02/04/05	6,020.05	7,620.33			6,020.06		6,020.06	0.00	
03/03/05	5,395.86 3,037.33	6,830.22 3,196.18			5,395.87	2,638.77	5,395.87 3,037.33	0.00 (398.56)	Over transfer resulted from change in allocation ratio
03/04/05	55,117.40		60,890.00			50,270.78	55,117.40	(4,846.62)	Over transfer resulted from change in allocation ratio
03/07/05	10,000.00	0.00			0.00	0.00	10,000.00	(10,000.00)	Transfer to allocation account in anticipation of LDD expenses that then unexpectedly did not get paid
03/23/05	5,532.89 5,956.45 (Partial)	7,003.63 14,337.25			5,532.87	11,836.83	5,532.87 5,956.45	(0.00) 5,860.38	Reduced amount of transfer to compensate for LDD allocation ratio changes
April/May	Not done	6,958.62			5,497.31		0.00	5,497.31	Transfer to allocation not made to compensate for portion of prior \$10,000 transfer for expenses that then unexpectedly did not get paid
07/11/05	\$2,133.44 (Partial)	8,400.16			6,636.13		2,133.44	4,502.69	Transfer to allocation reduced to compensate for remaining portion of prior \$10,000 transfer for expenses that then unexpectedly did not get paid

Federal Election Commission  
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