



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Alec Poitevint, Treasurer  
Republican National Committee - RNC  
310 First Street S.E.  
Washington, DC 20003

JAN 10 2001

Identification Number: C00003418

Reference: August Monthly Report (7/01/00-7/31/00)

Dear Mr. Poitevint:

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:

-Please clarify all expenditures made for "Media Buy" and "Ad Cost" on Schedules H4 and B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E or F supporting Lines 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule H4 of your report to clarify the following description(s): "Consulting", "Consulting Costs" and "Events". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule H4 of your report discloses a disbursement to the Fairmont Park Commission for a charitable donation. Please be advised that a charitable donation does not qualify as shared expense to be allocated between your federal and non-federal accounts. Federal operating expenses should be disclosed on a Schedule B supporting Line 21(b) of the Detailed Summary Page. Any reimbursement from your committee's non-federal account for this disbursement(s) is not permissible and should be transferred-out immediately. 11 CFR §102.5(a)(1)(i) Please amend your report to clarify the disbursement(s).

-Schedule H4 of your report discloses voided checks for shared expenditures made during previous reporting periods (pertinent portions attached). Please clarify if and when the voided checks disclosed on Schedule H4 were reissued. If these checks were not reissued, please clarify the steps your committee has taken to account for the federal portion of these voided checks.

Moreover, Schedule H3 discloses negative transactions which attempt to compensate for the previous transfer-in of the non-federal portion of these subsequently voided checks, thus reducing the amount of your committee's non-federal transfer for this reporting period. In the future, please note that when a committee voids a check for a payment of a shared activity, the non-federal portion of the payment must be transferred back to the non-federal account and reported on Schedule B supporting Line 22.

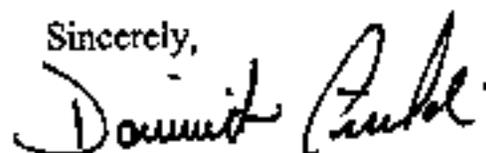
-Schedule H4 discloses a disbursement for E5 which is categorized as fundraising, however, Schedule H2 does not include an allocation ratio for this activity. Please amend Schedule H2 to disclose the omitted ratio.

-The disclosure of some administrative expenses on Schedule H4 appear to be 100% non-federal activities. 11 CFR §106.5(g) states that a committee shall pay the entire amount of an allocable expense from its federal account and shall transfer funds from its non-federal account solely to cover the non-federal share of that allocable expense. The Administrative/Voter Drive activity disclosed on your report as 100% non-federal does not represent payments for allocable expenses of joint federal and non-federal activities. Please be advised that by definition, this activity does not qualify as a shared expense to be allocated between your federal and non-federal accounts. This activity should be itemized on a Schedule B for Line 21(b) of the Detailed Summary Page. Any reimbursement from your committee's non-federal account for any portion of this activity is not permissible and must be returned. Please amend your report to clarify this discrepancy.

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 "Dominick Ciaraldi". The signature is written in a cursive style with a large initial "D".

Dominick Ciaraldi  
Reports Analyst  
Reports Analysis Division

DISBURSEMENT SCHEDULE B4  
 RUN DATE: 08/14/10

REPUBLICAN NATIONAL COMMITTEE  
 JOINT FEDERAL/NON FEDERAL  
 ACTIVITY SCHEDULE

PAGE: 322  
 FOR LINE 218

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RECIPIENT	PURPOSE OF EXPENDITURE	TOTAL	FEDERAL	NON-FEDERAL
RBT MARKETING ASSOC., INC. 212 CORPORATE PARK ROAD FOREST VA 24551	DATE: 07/19/00 PURPOSE: POSTAGE CATEGORY: FUNDRAISING EVENT: M7 EVENT \$YTD: \$21,639.11	433.62	303.53	130.09
COSTAR LLC/BUDDAKOH 134 MARKET ST PHILADELPHIA PA 19106	DATE: 07/07/00 PURPOSE: VOID#85014 5/01/00 CATEGORY: FUNDRAISING EVENT: P5 EVENT \$YTD: \$52,075.97	-10,000.00	-1,000.00	-9,000.00
COSTAR LLC/BUDDAKOH 134 MARKET ST PHILADELPHIA PA 19106	DATE: 07/06/00 PURPOSE: VOID#85069 5/16/00 CATEGORY: FUNDRAISING EVENT: P5 EVENT \$YTD: \$52,075.97	-17,000.00	-1,700.00	-15,300.00
CAPITOL HILL CLUB 300 FIRST ST., SE WASHINGTON DC 20003	DATE: 07/19/00 PURPOSE: MEALS CATEGORY: FUNDRAISING EVENT: P7 EVENT \$YTD: \$39,036.11	1,266.44	66.65	1,177.79
PETTY CASH FUND RMC 310 FIRST ST., SE WASHINGTON DC 20003	DATE: 07/07/00 PURPOSE: MEETINGS CATEGORY: FUNDRAISING EVENT: P7 EVENT \$YTD: \$39,036.11	8.07	.56	7.51
PETTY CASH FUND RMC 310 FIRST ST., SE WASHINGTON DC 20003	DATE: 07/07/00 PURPOSE: TAXI CATEGORY: FUNDRAISING EVENT: P7 EVENT \$YTD: \$39,036.11	8.00	.56	7.44
OLIVES 1600 K ST NW WASHINGTON DC 20006	DATE: 07/11/00 PURPOSE: CATERING CATEGORY: FUNDRAISING EVENT: P7 EVENT \$YTD: \$39,036.11	9,230.59	646.14	8,584.45
WASHINGTON DC 20006				
PAGE TOTAL		-16,053.28	-1,660.55	-14,392.73

*Handwritten:* LDC

DISBURSEMENT SCHEDULE H4  
 RUN DATE: 08/14/80

REPUBLICAN NATIONAL COMMITTEE  
 JOINT FEDERAL/MON FEDERAL  
 ACTIVITY SCHEDULE

PAGE: 323  
 FOR LINE 218

RECIPIENT

RECIPIENT	PURPOSE OF EXPENDITURE	TOTAL	FEDERAL	NON-FEDERAL
STEVE PEARSON 1709-1/2 21ST ST., NW APT. 24 WASHINGTON DC 20009	DATE: 07/06/00 PURPOSE: VOID#84993 4/25/00 CATEGORY: FUNDRAISING EVENT: P4 EVENT \$YTD: \$5,434.15	-3,000.00	-300.00	-2,700.00
STEVEN PEARSON 1817 N. OAKLAND ST. ARLINGTON VA 22207	DATE: 07/28/00 PURPOSE: MEALS CATEGORY: FUNDRAISING EVENT: P7 EVENT \$YTD: \$39,036.11	57.18	4.00	53.18
STEVE PEARSON 1709 1/2 21ST ST NW APT 24 WASHINGTON, DC 20009	DATE: 07/28/00 PURPOSE: MEALS CATEGORY: FUNDRAISING EVENT: P7 EVENT \$YTD: \$39,036.11	26.24	1.94	24.40
REFLECTIONS PHOTOGRAPHY, INC. 6408-P SEVEN CORNERS PL. FALLS CHURCH VA 22044	DATE: 07/24/00 PURPOSE: PHOTOGRAPHY COST CATEGORY: FUNDRAISING EVENT: P7 EVENT \$YTD: \$39,036.11	350.00	24.50	325.50
TOURNAMENT PLAYERS CLUB AT AVENUE 10000 OAKLYN DR. POTOMAC MD 20854	DATE: 07/07/00 PURPOSE: GOLF TOURNAMENT CATEGORY: FUNDRAISING EVENT: P7 EVENT \$YTD: \$39,036.11	20,089.59	1,966.27	26,123.32
APOLLO EXPRESS COURIER 140 LITTLE FALLS ST. SUITE 111 FALLS CHURCH VA 22046	DATE: 07/28/00 PURPOSE: DELIVERY COST CATEGORY: FUNDRAISING EVENT: P7 EVENT \$YTD: \$121,543.46	8.46	.59	7.87
BALFOUR PHOTOGRAPHY 2481 MISSION ST. SAN MARINO CA 91108	DATE: 07/07/00 PURPOSE: PHOTO SHOOTING FEE CATEGORY: FUNDRAISING EVENT: P7 EVENT \$YTD: \$121,543.46	370.00	25.90	344.10

PAGE TOTAL

25,901.47

1,723.10

24,178.37

