

National Republican Senatorial Committee

SENATOR GEORGE ALLEN
CHAIRMANJAY TIMMONS
EXECUTIVE DIRECTOR

SECRETARY OF THE SENATE

03 JUL -9 PM 3:33 H.D.

July 9, 2003

Ms. Julie Perry
Campaign Finance Analyst
Federal Election Commission
999 E Street, NW
Washington, DC 20463Reference: C00027466
September Monthly Report (8/1/02-8/31/02)

Dear Ms. Perry:

This letter is written in response to your letter dated June 25, 2003.

- A. The NRSC itemizes all credit card ultimate vendors to which the payment is over \$200 in calendar year in a memo entry and provides the name and address of those vendors. 11 CFR 104.10 requires only that committees disclose each disbursement from its federal or separate allocation account in payment for a joint federal and non-federal expense or activity. The cite in question does not mention memo entry credit card transactions. Those expenditures listed as unitemized are disbursements to vendors which are under the \$200 threshold for reporting ultimate vendors, as is directed in CFR 102.9(b)(2) and 104.9. We feel that we are in compliance with the regulations by continuing to follow these procedures. Please see attached pages 1452 and 1502 of 1674 replacing the description "FEC Compliance" with "Best Efforts Printing/Postage".
- B. Please see amended Schedule H4 page 1431/1674 providing clarification of the expense. This expenditure were not made in whole or in part on behalf of a specifically identified candid.
- C. The NRSC maintains a petty cash fund but does not make expenditures in excess of \$50 to any person for a purchase or transaction. The petty cash reimbursements disclosed on schedule H4 are to replenish the fund, not a single transaction.
- D. Schedule H4 correctly discloses the payments to "Consultant-Fundraising" as an administrative expense. These consultants provide general fundraising advice to the staff, the fee is not associated with a particular event and therefore cannot be allocated by the funds raised method.