



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

John Camp, Treasurer  
South Carolina Republican Party  
1508 Lady Street  
Columbia, SC 29201

MAR 3 1999

Identification Number: C00034033

Reference: Amended 30 Day Post-General Report (10/15/98-11/23/98), dated  
1/15/99

Dear Mr. Camp:

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:

-Your calculations for Line 31, Column A appear to be incorrect. FEC calculations disclose this amount(s) to be \$349,343.85. Please provide the corrected total(s) on the Detailed Summary Page.

-Schedule A of your report discloses a contribution(s) from an organization which is not a political committee registered with the Commission (pertinent portion(s) attached). In addition, the contribution appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) precludes a political committee from receiving contributions from a person or another committee in excess of \$5,000 in a calendar year. Also, in order to make contributions to your committee, organizations which are not political committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution. 11 CFR §102.5(b)

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of 2

**SOUTH CAROLINA REPUBLICAN PARTY**

**PAGE 2**

U.S.C. §§441a(f) and 441b. If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR §102.5(a).

In order to be in compliance with the Act, your committee must: 1) refund to the donor, or transfer-out to a non-federal account, the amount in excess of \$5,000 and 2) determine the extent to which your committee received funds that are not permissible, and refund or transfer-out the prohibited funds.

If you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the funds, the Commission will presume the funds were impermissible, absent a statement from your committee to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which they are made.

Although the Commission may take further legal action concerning the acceptance of prohibited and excessive contribution(s), your prompt refund or transfer-out will be taken into consideration.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted

under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Please clarify all expenditures made for Telemarketing, Issue Advertisement and Radio Advertisement on Schedule H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or F supporting Line 23 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-A review of the reports filed by your committee (pertinent portion(s) attached) indicates that your committee received a transfer(s) from the National Republican Senatorial Committee which has not been disclosed on their report(s) of receipts and disbursements. Please provide clarifying information regarding the source of the transfer(s) received by your committee.

**SOUTH CAROLINA REPUBLICAN PARTY**

**PAGE 4**

-You must attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may establish "best efforts" by providing the Commission with a description of its procedures for requesting the information. It is also in the best interests of the committee to provide a copy of its solicitation. In order to establish "best efforts", the committee must demonstrate that it makes at least one request for the information after the contribution is received. This one request must be made for any solicited or unsolicited contribution that, in the aggregate, exceeds the \$200 threshold and lacks the necessary information.

Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that, in the aggregate, exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make a written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation, and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle.

If a committee receives contributor information after the contributions have been reported, the committee shall either a) file with its next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before its next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.3(a)(4)(i) and 11 CFR § 104.7)

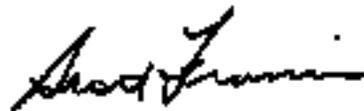
-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions from Other Political Committees should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

SOUTH CAROLINA REPUBLICAN PARTY  
PAGE 5

-2 U.S.C. §434(b)(3) requires itemization of contributions from individuals and persons other than political committees, where the aggregate total from the contributor exceeds \$200 in a calendar year. In addition, 11 CFR §104.3(a)(2)(i)(B) requires a committee to report the total amount of unitemized contributions (see Line 11(a)(ii) of the Detailed Summary Page). If a committee wishes to disclose contributions regardless of the amount contributed, the committee must separate (on separate receipt schedules) those contributors requiring itemization from those who are not required to be itemized. 11 CFR §104.3(a)(4)(i) For future filings, please submit your reports in this order.

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. My local number is (202) 694-1130.

Sincerely,



Scott A. Francis  
Reports Analyst  
Reports Analysis Division

## SCHEDULE A

## ITEMIZED RECEIPTS

Use separate schedule(s)  
for each category of the  
Detailed Summary PagePAGE OF  
FOR LINE NUMBER

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

SC Republican Party

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Frank E. Barron, Jr. 14 Millpond Cola SC 29204	Self	10/26/98	\$100 <sup>00</sup>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Farmer	Aggregate Year-to-Date > \$ 100.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
John F. Breaglio 1120 Fifth Avenue #13C NY NY 10128		10/19/98	\$100 <sup>00</sup>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 100.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
William F. Cotty 9890 Windsor Lake Blvd Cola SC 29223	Self	10/23/98	\$100 <sup>00</sup>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation attorney	Aggregate Year-to-Date > \$ 100.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
William B. Hewitt 7 Orange St. Char. SC 29401	Holiday Kamper & Boats	10/28/98	\$2.20 <sup>00</sup>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 2.000.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Paul G. Taylor 508 Carriage Ln. Lexington SC 29072	Keep America Beautiful	10/23/98	\$100 <sup>00</sup>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Administrator	Aggregate Year-to-Date > \$ 100.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
R.L. Beasley P.O. Box 1038 Darlington, SC 29540	Carolina Bank & Trust Co.	10/28/98	\$2,350 <sup>00</sup>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation V.P.	Aggregate Year-to-Date > \$ 2,350.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Harvey Reeler for Senate P.O. Box 742 Gaffney SC 29342	Reeler milk	10/15/98	\$5,000 <sup>00</sup>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation V.P.	Aggregate Year-to-Date > \$ 5,000.00	

SUBTOTAL of Receipts This Page (optional)

9,750<sup>00</sup>

TOTAL This Period (last page this line number only)

## SCHEDULE A

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NAME OF COMMITTEE (In Full)

SC Republican Party

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
James R. Metts P.O. Box 594 Lexington, SC 29071	Lexington Co Sheriff	10/30/98	\$1,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 1,000.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Leonard Quigley 53 Underwood Rd. Forest Hills, NY 11375	Retired	10/30/98	\$535.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 535.00		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Ade Kennedy 106 Briscoe Rd. New Canaan, CT 06840	Housewife	10/29/98	\$100.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 100.00		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Ekstam Committee P.O. Box 12112 Columbia, SC 29211	Nelson, Mullins Law Firm attorney	11/4/98	\$5,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 5,000.00		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (optional)

6,635.00

TOTAL This Period (last page this line number only)

\$120,966.71

RULE A

## ITEMIZED RECEIPTS

Use separate schedule(s)  
for each category of the  
Detailed Summary PagePAGE OF  
FOR LINE NUMBER

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SC Republican Party

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Horace Richardson 211 Forest Glen Dr. Piedmont, SC 29673	Retired	10/27/98	\$250 <sup>00</sup>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 250.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Ray E. Wuthian 714 Vintage Ln. Columbia, SC 29210	ASSOC. General Contractors of America Employee	11/1/98	\$100 <sup>00</sup>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 100.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
John W. Riser 159 Holly Ridge Ln. W. Columbia, SC 29169	The Flower Basket Owner	11/2/98	\$105 <sup>00</sup>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 105.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Robert F. Zaehler 1336 Methodist Park Rd. W. Columbia, SC 29170	Gene Soxe Plumbing Plumber	10/26/98	\$2,000 <sup>00</sup>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 2,000.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Bobby Harrell 15 Casa Bianca Dr. Columbia, SC 29407	State Farm Insurance	10/29/98	\$5,000 <sup>00</sup>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 5,000.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Campaign for S.C. House P.O. Box 59 Charleston, SC 29402	Self Attorney	10/20/98	\$3,500 <sup>00</sup>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 3,500.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Genevieve Sakas 201 Chapman Rd. Greenville, SC 29605	Retired	10/31/98	\$100 <sup>00</sup>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 2,100.00	

SUBTOTAL of Receipts This Page (optional)

11,055.<sup>00</sup>

TOTAL This Period (last page this line number only)

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NAME OF COMMITTEE (In Full)

SC Republican Party

A. Full Name, Mailing Address and ZIP Code

Nat'l Repub. Sen. Committee  
425 Second St, NE  
Washington, DC 20002Receipt For:  Primary  General  
 Other (specify):

Name of Employer

Occupation

Date (month,  
day, year)

10/15/98

Amount of Each  
Receipt This Period

\$ 4,038.75

Aggregate Year-to-Date \$

B. Full Name, Mailing Address and ZIP Code

Republican Gov's Assoc.  
310 First Street, SE  
Washington, DC 20003Receipt For:  Primary  General  
 Other (specify):

Name of Employer

Occupation

Date (month,  
day, year)

10/15/98

Amount of Each  
Receipt This Period\$ 58,000.<sup>00</sup>

Aggregate Year-to-Date \$

C. Full Name, Mailing Address and ZIP Code

Nat'l Repub. Sen. Committee  
425 Second St, NE  
Washington, DC 20003Receipt For:  Primary  General  
 Other (specify):

Name of Employer

Occupation

Date (month,  
day, year)

10/9/98

Amount of Each  
Receipt This Period\$ 63,645.<sup>00</sup>

Aggregate Year-to-Date \$

D. Full Name, Mailing Address and ZIP Code

Repub. Nat'l Committee  
310 First Street, SE  
Washington, DC 20003Receipt For:  Primary  General  
 Other (specify):

Name of Employer

Occupation

Date (month,  
day, year)

10/21/98

Amount of Each  
Receipt This Period

\$ 14,062.50

Aggregate Year-to-Date \$

E. Full Name, Mailing Address and ZIP Code

Nat'l. Repub. Sen. Committee  
425 Second Street, NE  
Washington, DC 20003Receipt For:  Primary  General  
 Other (specify):

Name of Employer

Occupation

Date (month,  
day, year)

10/27/98

Amount of Each  
Receipt This Period\$ 9,655.<sup>00</sup>

Aggregate Year-to-Date \$

F. Full Name, Mailing Address and ZIP Code

Nat'l Repub. Sen. Committee  
425 Second Street, NE  
Washington, DC 20003Receipt For:  Primary  General  
 Other (specify):

Name of Employer

Occupation

Date (month,  
day, year)

10/28/98

Amount of Each  
Receipt This Period\$ 36,000.<sup>00</sup>

Aggregate Year-to-Date \$

G. Full Name, Mailing Address and ZIP Code

Repub. Nat'l Committee  
310 First Street, SE  
Washington, DC 20003Receipt For:  Primary  General  
 Other (specify):

Name of Employer

Occupation

Date (month,  
day, year)

10/29/98

Amount of Each  
Receipt This Period\$ 20,000.<sup>00</sup>

Aggregate Year-to-Date \$

SUBTOTAL of Receipts This Page (optional)

\$ 205,451.55

TOTAL This Period (last page this line number only)

