

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

Blue Circle America PAC

FEB 11 12 58 PM '99

Two Parkway Center
1800 Parkway Place
Suite 1200
Marietta, Georgia 30067
Telephone (404) 423-4700

February 8, 1999

Ms. Andrea Wilkens
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Re: Blue Circle America Inc. PAC (Blue Circle PAC)
12 Day Pre-General Report (10/1/98 - 10/14/98)

Dear Ms. Wilkens:

I received your letter dated January 20, 1999 regarding questions you had on Blue Circle PAC's 12 Day Pre-General Report (see attached copy of your letter). You indicated that the \$1,000 contribution to George Voinovich who was running for the Ohio Senate was improperly disclosed as a Primary election contribution because the election had already occurred on May 5, 1998.

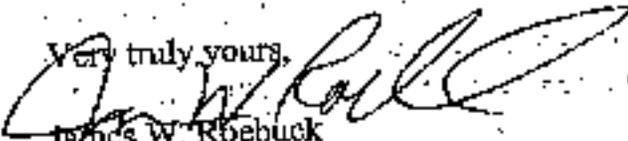
I was not aware that the Primary election was held in Ohio so early in the year. In Georgia, the Primary election is in August (I believe).

Since the Primary election was already held in Ohio at the time the contribution was made, the \$1000 contribution is more appropriately disclosed as a General election contribution.

I have tried to contact someone with the Voinovich campaign to determine how they disclosed the receipt. However, the campaign organization is already dismantled and I was not able to speak to anyone.

I hope this clears up your questions regarding this matter. If you have any further questions or if this disclosure does not match up with the Voinovich campaign disclosure, please call me at (770) 423-4735.

Very truly yours,


James W. Riebeck
Treasurer

JWR:ja



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

James W. Roebuck, Treasurer
Blue Circle America Inc. PAC
1800 Parkway Place, Suite 1200
Marietta, GA 30067

JAN 20 1999

Identification Number: C00285429

Reference: 12 Day Pre-General Report (10/1/98-10/14/98)

Dear Mr. Roebuck:

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 B supporting Line 23 of your report discloses a contribution(s) to a candidate(s) for the Primary election; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. Please clarify the contribution(s) and disclose any redesignations or refunds as necessary on the appropriate schedules.

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,

Andrea Wilkens
Reports Analyst
Reports Analysis Division

SCHEDULE B		ITEMIZED DISBURSEMENTS		Use separate schedule(s) for each category of the Detailed Summary Page	18 / 18
					FOR LINE NUMBER
					23
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) Blue Circle America Inc. PAC (Blue Circle PAC)					
Full Name, Mailing Address, and ZIP Code		Purpose of Disbursement		Date (month, day, year)	Amount of Each Disbursement This Period
Mr. George Voinovitch 8 East Broad Street, 8th Floor Columbus OH 43215		Senate - OH -) Senate - Ohio		07/10/1998	1000.00
		Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		Primary date: 5/5/98	
		<input checked="" type="checkbox"/> Other (specify): Primary 1998			
Full Name, Mailing Address, and ZIP Code		Purpose of Disbursement		Date (month, day, year)	Amount of Each Disbursement This Period
Lonagan for Congress PO Box 252 Bogota NJ 07603		(House - NJ - 9) 9th District - New Jersey		08/03/1998	500.00
		Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General			
		<input checked="" type="checkbox"/> Other (specify): General 1998			
Full Name, Mailing Address, and ZIP Code		Purpose of Disbursement		Date (month, day, year)	Amount of Each Disbursement This Period
Norwood for Congress PO Box 499 Evans GA 30609		(House - GA - 10) GA - 10th District		08/17/1998	1000.00
		Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General			
		<input type="checkbox"/> Other (specify):			
Full Name, Mailing Address, and ZIP Code		Purpose of Disbursement		Date (month, day, year)	Amount of Each Disbursement This Period
Chambles for Congress PO Box 4084 Macon GA 31208		(House - GA - 8) Georgia-8th District		08/24/1998	1000.00
		Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General			
		<input type="checkbox"/> Other (specify):			
Full Name, Mailing Address, and ZIP Code		Purpose of Disbursement		Date (month, day, year)	Amount of Each Disbursement This Period
Coverdell Good Government Committee 3091 Maple Drive, Suite 200 Atlanta GA 30305		(Senate - GA -) GA-Senate		08/27/1998	1100.00
		Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General			
		<input type="checkbox"/> Other (specify):			
Full Name, Mailing Address, and ZIP Code		Purpose of Disbursement		Date (month, day, year)	Amount of Each Disbursement This Period
Eneign for Senate PO Box 86407 Las Vegas NV 89193		(Senate - NV -) Nevada-Senate		08/27/1998	1000.00
		Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General			
		<input type="checkbox"/> Other (specify):			
Full Name, Mailing Address, and ZIP Code		Purpose of Disbursement		Date (month, day, year)	Amount of Each Disbursement This Period
Jack Kingston for Congress 8605 Abernethy Street, Suite 102 Savannah GA 31408		(House - GA - 1) GA - 1st District		09/02/1998	1000.00
		Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General			
		<input type="checkbox"/> Other (specify):			
Full Name, Mailing Address, and ZIP Code		Purpose of Disbursement		Date (month, day, year)	Amount of Each Disbursement This Period
Sunny Warren for U.S. Congress Post Office Box 2833 Norcross GA 30071		(House - GA - 4) GA - 4th District		09/15/1998	4500.00
		Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General			
		<input type="checkbox"/> Other (specify):			
Full Name, Mailing Address, and ZIP Code		Purpose of Disbursement		Date (month, day, year)	Amount of Each Disbursement This Period
Georgia Crushed Stone Association 3050 Presidential Drive, Suite 218 Atlanta GA 30350		Sunny Warren, House 4th District, GA		09/15/1998	500.00
		Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General		Reception-Fundraiser (IN KIND)	
		<input type="checkbox"/> Other (specify):			
SUBTOTALS of Disbursements This Page (Optional)					
TOTALS This Period (last page this line number only)					11800.00

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.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> First Class Mail	POSTMARKED 2-10-99
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>SW</i> PREPARER	2-11-99 DATE PREPARED