



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20541

RQ-2

Marvin H. Smith, Treasurer  
Georgia Republicans  
3091 Maple Drive, Suite 315  
Atlanta, GA 30305

OCT 5 1994

Identification Number: C00150672

Reference: 12 Day Pre-Primary Report (4/1/94-6/29/94)

Dear Mr. Smith:

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:

-On Schedule H2, you have failed to check the Type of Activity box for the activity/event Kemp 93. Please amend your report to correct this omission. 11 CFR §104.10(a)(1)

-On Schedule H2, you have failed to check the ratio type box (i.e., NEW, REVISED, SAME AS PREVIOUSLY REPORTED). Please amend your report to correct this omission. 11 CFR §104.10(a)(1)

-On Schedule H2, you have disclosed allocation percentage ratios for PD94 which do not equal 100% when added together. Please amend your report to correct this discrepancy. 11 CFR §104.10(a)(1)

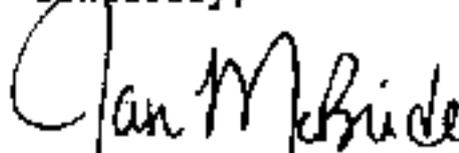
-Your calculations for fundraising EVENT YEAR-TO-DATE totals are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year within the category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct fundraising EVENT YEAR-TO-DATE totals.

-Schedule H3 of your report discloses negative transfers of \$9,243.61 and \$1,725.10 to your State Money Market Account. If these transactions represent transfers from the federal account to the non-federal account for a fundraising ratio adjustment, they should be properly reported on Schedule H4, supporting Line 21(a) of the Detailed Summary Page. The event should be identified on Schedules H2 and H4, as well as the date on which the fundraiser took place. Please amend your report to correctly disclose these disbursements. (See enclosed example)

-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 descriptions: FLYIN. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

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) 219-3580.

Sincerely,



Jan McBride  
Reports Analyst  
Reports Analysis Division

DISBURSEMENT SCHEDULE H-4  
(effective 1/1/91)

JOINT FEDERAL/NON-FEDERAL  
ACTIVITY SCHEDULE

PAGE 2 OF 2  
FOR LINE 21a

NAME OF COMMITTEE *State Party Federal Committee*

| LINE  | A. FULL NAME, MAILING ADDRESS & ZIP CODE                               | PURPOSE/EVENT   | DATE                                    | TOTAL AMOUNT  | FEDERAL SHARE   | NON-FEDERAL SHARE |
|---|--|---|---|---------------|---|-------------------|
| 15<br>D.  | <i>WX42 Radio Station<br/>4545 Canyon Blvd.<br/>City, State Zip</i>    | <i>Radio ad:<br/>C.S. 101</i>                                 | <i>2/20</i>                             | <i>10,000</i> | <i>500<br/>Schedule B<br/>for Line 23</i>                                   | <i>5,000</i>      |
| CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT<br>EVENT YEAR-TO-DATE: <i>10,000</i> <input checked="" type="checkbox"/> DIRECT CANDIDATE SUPPORT            |  |   |   |               |   |                   |
| 16<br>E.  | <i>Business Services, Inc.<br/>300 Main Street<br/>City, State Zip</i> | <i>Phone bank<br/>rental:<br/>C.S. 202</i>                    | <i>2/20</i>                             | <i>10,000</i> | <i>2,500<br/>Exempt activity<br/>and see<br/>Schedule B<br/>for line 23</i> | <i>4,500</i>      |
| CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input checked="" type="checkbox"/> EXEMPT<br>EVENT YEAR-TO-DATE: <i>10,000</i> <input checked="" type="checkbox"/> DIRECT CANDIDATE SUPPORT |  |   |   |               |   |                   |
| 17<br>F.  | <i>State Party Committee<br/>Non Federal Account</i>                   | <i>Ratio<br/>adjustment<br/>transfer:<br/>Dec. fundraiser</i> | <i>2/25<br/>(Event date:<br/>12/29)</i> | <i>1,000</i>  | <i>1,000</i>  |                   |
| CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT<br>EVENT YEAR-TO-DATE: <i>10,000</i> <input type="checkbox"/> DIRECT CANDIDATE SUPPORT            |  |   |   |               |   |                   |
| SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE  |  |   |   | <i>21,000</i> | <i>3,500</i>  | <i>9,500</i>      |
| TOTAL THIS PERIOD (last page for each line only) (Fed. share to 21 a. and non-Fed. share to 21 a.)  |  |   |   | <i>38,000</i> | <i>8,190</i>  | <i>21,810</i>     |
| TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for line 31 of the detailed summary page)   |  |   |   |               |   |                   |

15 Entry D illustrates how the federal share of a direct candidate support expense is actually reported on the appropriate line number of the Detailed Summary Page, and only referenced on Schedule H-4.

reported on Schedule H-4 and the direct candidate support share is reported on the appropriate line number of the Detailed Summary Page (see entry D).

16 Entry E shows the reporting of an activity where the federal share was split between an exempt activity and a direct candidate support activity. The federal share of the exempt activity is

17 Entry F indicates how a committee reports a transfer from the federal account to the nonfederal account as a result of an adjusted allocation ratio which resulted in the nonfederal account paying more than its share of the allocable expense.

SCHEDULE H2  
(effective 1/1/91)

ALLOCATION RATIOS

PAGE 1 OF 1

NAME OF COMMITTEE

State Party Federal Committee

ALLOCATION RATIOS FOR INDIVIDUAL FUNDRAISING EVENTS, EXEMPT ACTIVITIES, AND SHARED DIRECT CANDIDATE SUPPORT APPEARING ON THIS REPORT.

Methods of allocation:

- I. FUNDRAISING activities are allocated using the "funds received method" where the federal proportion of expenses must equal the federal proportion of monies raised.
- II. EXEMPT activities are allocated using the "time and space method" where the federal proportion of disbursements is based on the proportion of time or space devoted to federal candidates.
- III. Shared DIRECT CANDIDATE support activities are allocated according to benefit expected to be derived, where the federal proportion of disbursements is based on the benefit derived by federal candidates from the activity.

| NAME OF ACTIVITY OR EVENT  | FEDERAL % | NON-FEDERAL % |
|--|-----------|---------------|
| B. Lincoln's Birthday Gala<br>ACTIVITY IS: <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT<br>CHECK IF THE RATIO IS: <input type="checkbox"/> NEW <input type="checkbox"/> REVISED <input checked="" type="checkbox"/> SAME AS PREVIOUSLY REPORTED                 | 30        | 70            |
| C. State Card District 3<br>ACTIVITY IS: <input type="checkbox"/> FUNDRAISING <input checked="" type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT<br>CHECK IF THE RATIO IS: <input checked="" type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> SAME AS PREVIOUSLY REPORTED                   | 22        | 78            |
| D. C.S. 101 <sup>12</sup><br>ACTIVITY IS: <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT <input checked="" type="checkbox"/> DIRECT CANDIDATE SUPPORT<br>CHECK IF THE RATIO IS: <input checked="" type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> SAME AS PREVIOUSLY REPORTED                  | 50        | 50            |
| E. C.S. 202<br>ACTIVITY IS: <input type="checkbox"/> FUNDRAISING <input checked="" type="checkbox"/> EXEMPT <input checked="" type="checkbox"/> DIRECT CANDIDATE SUPPORT<br>CHECK IF THE RATIO IS: <input checked="" type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> SAME AS PREVIOUSLY REPORTED                     | 55        | 45            |
| F. December Fundraiser (Event date: 12/29)<br>ACTIVITY IS: <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT<br>CHECK IF THE RATIO IS: <input type="checkbox"/> NEW <input checked="" type="checkbox"/> REVISED <input type="checkbox"/> SAME AS PREVIOUSLY REPORTED | 40        | 60            |

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<sup>12</sup> The identifier assigned to an activity or event may be a code, a title or a name. Whether a code or a name, the identifier must be unique for that particular activity/event, and it must be used each time the committee reports financial transactions related to that activity/event.

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