

# MONTANA REPUBLICAN PARTY

RECEIVED

FEDERAL ELECTION

1419 B Helena Avenue • Helena, Montana 59601 • (406) 442-6469 • Fax (406) 442-5293 • 40811 erac@mtgop.org

May 9, 2000

2000 MAY 18 P 1:31

Lucy J. Denny, Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Re: Montana Republican State Central Committee C8086  
Year End Report (7/1/99 through 12/31/99)

Dear Ms. Denny:

This letter is in response to your letter of April 19, 2000 regarding questions on our report noted above. A copy of your letter is attached for your reference.

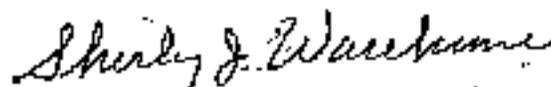
The Lapsed Donor project is a new fund raising event. It is not the same event as reported on the 1999 year end report. The ratio is the same since each event had a small amount of proceeds deposited to the state account which was rounded to 1%. There were actually two lapsed donor events in calendar year 1999. The event reported on this report is Program #2. A revised H-2 is attached to show this.

Schedule H-3—The computer print out cut off the name of the bank account for this schedule. A revised schedule is attached.

The Event Year-To-Date calculations are correct on the Schedule H-4 submitted with the original report. As explained above, there were two lapsed donor events in calendar year 1999. The Lapsed Donor project reported in the Mid-Year Report was Program #1. The Lapsed Donor project reported in the Year-End Report is Program #2. A corrected page 37 for Schedule H-4 is attached to note this difference.

If you have questions or need additional information, please advise.

Very truly yours,



Shirley J. Warehime  
State Treasurer

Cc: Montana Commissioner of Political Practice



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Shirley J. Warehime, Treasurer  
Montana Republican State Central Committee  
1419-B Helena Avenue  
Helena, MT 59601

APR 19 2000

Identification Number: C00008086

Reference: Year End Report (7/1/99-12/31/99)

Dear Ms. Warehime:

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 disclose the ratio for Lapsed Donors to be "new"; however, Schedule H2 of your 1999 Year End Report disclosed a ratio for this activity/event which is identical to the one given in this report. Please amend your report to clarify this discrepancy. 11 CFR §104.10(a)(1)

-Your report lists the name of the account on Schedules H3 as your committee's address. Be advised the account should be a non-federal account. Please amend your report to clarify the NAME OF ACCOUNT on Schedules H3. *computer not name of - correct*

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive 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

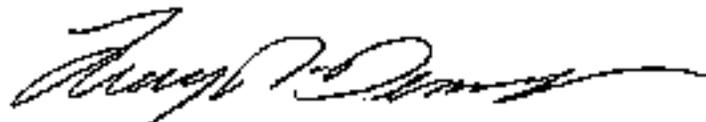
*problem with multiple  
lapsed donor programs -  
not identified on print out*

*different  
years  
1998 program  
1997  
also program  
1 2*

EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct EVENT YEAR-TO-DATE totals.

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,



Lucy J. Denny  
Reports Analyst  
Reports Analysis Division

**SCHEDULE H2**

EFFECTIVE 1/1/91

**ALLOCATION RATIOS**

RECEIVED  
FEDERAL ELECTION  
COMMISSION MAIL ROOM

**NAME OF COMMITTEE**

Montana Republican State Central Committee

2000 MAY 19 10 4 31

**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 %
LAPSED DONORS -- Program #2  ACTIVITY IS: <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS: <input checked="" type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> SAME AS PREVIOUSLY REPORTED	99.00	1.00
1997-1998 DONORS  ACTIVITY IS: <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS: <input checked="" type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> SAME AS PREVIOUSLY REPORTED	99.00	1.00
SPECIAL APPEAL TO 99 DONORS  ACTIVITY IS: <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS: <input checked="" type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> SAME AS PREVIOUSLY REPORTED	99.00	1.00
MAJOR DONOR PROGRAM  ACTIVITY IS: <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS: <input checked="" type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> SAME AS PREVIOUSLY REPORTED	99.00	1.00
CAP SALES  ACTIVITY IS: <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS: <input checked="" type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> SAME AS PREVIOUSLY REPORTED	50.00	50.00
SPECIAL APPEAL--MAIL  ACTIVITY IS: <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS: <input checked="" type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> SAME AS PREVIOUSLY REPORTED	99.00	1.00
2000 MEMBERSHIP MAILING  ACTIVITY IS: <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS: <input checked="" type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> SAME AS PREVIOUSLY REPORTED	97.50	2.50

**RECEIPT SCHEDULE H3**

RECEIVED 1/1/91

**TRANSFERS FROM  
NON-FEDERAL ACCOUNTS**

<b>NAME OF COMMITTEE</b> Montana Republican State Central Committee	<b>TOTAL AMOUNT TRANSFERRED</b>
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<b>NAME OF ACCOUNT</b> Montana Republican State Central Committee State Account	<b>DATE OF RECEIPT</b> 08/18/1999	\$22000.00
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	BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN./VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT	
i) Total Administrative/Voter Drive	\$22000.00			
ii) Direct Fundraising (List Events-Amount for Each)				
a)				
b)				
c)				
d)				
e) Total Amount Transferred For Direct Fundraising				
iii) Exempt Activity/Direct Candidate Support (List Events-Amount for Each)				
a)				
b)				
c)				
d)				
e) Total Amount Transferred For Exempt Activity/Direct Candidate Support				

	TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN./VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DCS	
SUBTOTAL THIS PAGE	\$22000.00			\$22000.00
TOTAL THIS PERIOD	\$22000.00			\$22000.00

DISBURSEMENT SCHEDULE H4

JOINT FEDERAL/NON-FEDERAL ACTIVITY SCHEDULE

EFFECTIVE 1/1/91

PAGE	OF
37	40
FOR LINE 21a	

NAME OF COMMITTEE

Montana Republican State Central Committee

FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL %	NON-FEDERAL %
Strategic Telecommunications 2610 University Ave. W., #500 Saint Paul, MN 55114-	LAPSED DONORS telemarketing Program #2	08/24/1999	\$1466.64	\$1451.97	\$14.67
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: \$1466.64 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
Strategic Telecommunications 2610 University Ave. W., #500 Saint Paul, MN 55114-	LAPSED DONORS telemarketing Program #2	09/03/1999	\$6204.85	\$6142.80	\$62.05
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: \$7671.49 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
Postmaster 2300 North Harris Main Post Office Helena, MT 59601-	1997-1998 DONORS postage BEM account	08/31/1999	\$500.00	\$495.00	\$5.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: \$500.00 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
Strategic Telecommunications 2610 University Ave. W., #500 Saint Paul, MN 55114-	1997-1998 DONORS telemarketing	08/31/1999	\$1862.40	\$1843.78	\$18.62
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: \$2362.40 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
Strategic Telecommunications 2610 University Ave. W., #500 Saint Paul, MN 55114-	1997-1998 DONORS telemarketing	09/10/1999	\$4523.30	\$4478.07	\$45.23
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: \$6885.70 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					

SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE	\$14557.19	\$14411.62	\$145.57
TOTAL THIS PERIOD: (last page for each line only; Fed. share 1st and non-fed. 2nd)			
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for line 33 of the detailed summary page)			

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 type="checkbox"/> First Class Mail	POSTMARKED
<input checked="" type="checkbox"/> Registered/Certified Mail	POSTMARKED 5-9-00
<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>JS</i> PREPARER	 5-18-00 DATE PREPARED