Republican
National
Committee

Counsel's Office

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December 7, 2000

Mr. John D. Gibson
Mr. Dominic Chiaraldi
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Messrs. Gibson and Chiaraldi:

This letter is in response to you recent requests for additional information regarding the Republican National Committee's May and July reports. While we will attempt to address these issues in this letter, we feel there may be some issues that are better resolved through a face-to-face meeting between our counsel and reporting staff and the staff at the Reports Analysis Division. Therefore, we would like to propose a meeting at your earliest convenience. Our hope is that such a meeting will allow us to fully explain our understanding of the relevant statutes and regulations, and get a more complete understanding of the Commission's position to ensure that we are all operating consistently.

You have raised questions relating to revised fundraising ratios on our May report. Specifically, you have asked for more specific dates for items marked S3, S4 and so on. As we have indicated, these are ongoing fundraising programs that have no specific event date associated with them. These are re-named S2, S3, S4 and so on, on each successive report. As the programs have no start or end dates, we are unsure of how to provide specific dates. We have been reporting ongoing events in this manner since the Commission revised its regulations in 1991 and are somewhat confused as to why this issue is only being raised now. This is one of the specific items we think would be best discussed in a personal meeting.

In addition, your letter of November 30, 2000 raises questions concerning the reporting of some administrative expenses as 100 percent non-federal activities. These activities relate exclusively to the redistricting programs of the Republican National Committee. We believe that the 100 percent non-federal allocation of these activities is completely consistent with guidance provided in Commission Advisory Opinions 1981-35, 1982-14, and 1982-37.

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You have also asked for more detailed information concerning the handling of voided checks and how the Committee accounts for these voids. Any time a check is voided, our internal software automatically makes note of the non-federal share, and subtracts that amount from the ultimate total used to determine transfers from the non-federal to the federal account of the Committee. It is our understanding that none of the voided checks were reissued.

As we indicated above, we hope these responses are sufficient to answer all of your outstanding questions regarding past Committee reports and reporting practices. If you have additional issues you would like to discuss concerning these or other reporting issues, we strongly feel that a face-to-face meeting would be helpful. Please let us at your earliest convenience whether such a meeting can be arranged.

Thank you in advance for your help on this matter.

Sincerely,

Alex N. Vogel

Tom Josefiak
Chief Counsel
Alex N. Vogel
Deputy Counsel

Federal Election Commission

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J.A.D. — PREPARER

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