

*Massachusetts  
Republican Party*

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*Jim Rappaport  
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August 16, 1995

Ms. Debbie Manzano  
Report Analyst  
Federal Elections Commission  
999 E Street, NW  
Washington, D.C. 20463

Dear Ms. Manzano:

Pursuant to a recent telephone conversation, I would like to review the current status of the debts and obligations owed by the Massachusetts Republican State Committee (MRSC) as reported in the 1995 mid-year FEC report and the solution discussed.

The Massachusetts Republican State Committee has in the past transferred from the State Account to the Federal Account more funds than allowed under the allocation formula. We have in fact exceeded the allowed amount by \$194,128.76, simply because we have continued to follow our long-standing policy of depositing all contributions made to the MRSC in the State Account until the individual reached the legal annual limit, at which time the contribution was allocated to the Federal Account. This policy was followed unless the contribution was specifically designated for the state party's Federal Account.

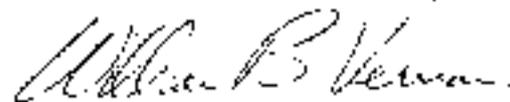
According to the 1995 mid-year report, the excess transfer has been designated as "a loan" and must be paid back. To resolve this imbalance, we will reverse our policy and deposit all permissible donations in the Federal Account until such time as the loan is repaid. "Permissible donations" include all checks that are not specified as contributions to the State Account or, if unspecified, exceed the legal annual limit for the Federal Account. Thus, for example, checks made payable to "Massachusetts Republican Party" or "Mass. GOP" will be deposited in the Federal Account. Mr. Bradley S. Balzer, Esq., Deputy Director of the Commonwealth of Massachusetts Office of Campaign and Political Finance, One Ashburton Place, Boston, MA 02108, has stated that this policy is agreeable to the state.

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When the imbalance has been eliminated, procedures will be in place so that transfers will follow the allocation formula.

Thank you very much for your assistance in regard to this matter.

Very truly yours,



William B. Vernon  
Executive Director

WBV/gmc

cc: Jim Rappaport, Chairman, MRSC  
Evan Slavitt, Esq., General Counsel, MRSC  
Lawrence P. Novak, Treasurer, MRSC  
Bradley S. Balzer, Esq., OCPF

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