



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

John Camp, Treasurer  
South Carolina Republican Party  
1508 Lady Street  
Columbia, SC 29201

RDV 15 2000

Identification Number: C00034033

Reference: July Quarterly Report (4/01/00-6/30/00)

Dear Mr. Camp:

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 A supporting Line 11(a)(i) of your report discloses a \$2,826 receipt for filing fees from Buck for Congress, which appears to be a non-federal candidate committee. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the

donor(s) in accordance with 11 CFR §103.3(b). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Your calculations for Line 6(d), Column B appear to be incorrect. FEC calculations disclose this amount(s) to be \$247,286.73. Please provide the corrected total(s) on the Summary Page.

-Your calculations for Line 8 appear to be incorrect. Cash-on-hand at the close of the current reporting period should always equal the closing calendar year-to-date cash-on-hand amount. Please provide the corrected total on the Summary Page.

-Please provide a Schedule A to support the entry disclosed on Line 11(b) of the Detailed Summary Page. All contributions from political committees must be itemized on Schedule A regardless of the amount. 2 U.S.C. §434(b)(3)(B)

-Schedule H4 supporting Line 21(a) of the Detailed Summary Page (pertinent portion attached) discloses a \$33,912 disbursement for "Candidate Filing" which appears to be a payment for filing fees that were collected from federal candidates and disclosed on Schedule A of your report. Please be advised that the payment of filing fees, which were collected from federal candidates as a condition of ballot access, do not qualify as shared expenses to be allocated between your federal and non-federal accounts. This activity should be disclosed on Schedule B supporting Line 21(b). Any reimbursement from your committee's non-federal account for any portion of this contribution is not permissible. 11 CFR §102.5(a)(1)(i)

The Commission recommends that you immediately transfer the funds received by your federal account for these activities, as reimbursement for the non-federal portion, back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have not included the full name and/or mailing address for the vendor(s) listed. Please amend your report accordingly.

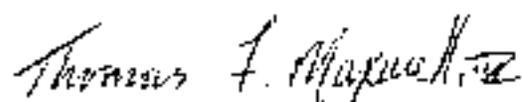
-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for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

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Filing fees from federal candidate committees should be properly disclosed on a separate Schedule A, supporting Line 17 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-2 U.S.C. §434(b)(3) requires itemization of contributions from individuals and persons other than political committees, where the aggregate total from the contributor exceeds \$200 in a calendar year. In addition, 11 CFR §104.3(a)(2)(i)(B) requires a committee to report the total amount of unitemized contributions (see Line 11(a)(ii) of the Detailed Summary Page). If a committee wishes to disclose contributions regardless of the amount contributed, the committee must separate (on separate receipt schedules) those contributors requiring itemization from those who are not required to be itemized. 11 CFR §104.3(a)(4)(i) For future filings, please submit your reports in this order.

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,



Thomas F. Maxwell, III  
Reports Analyst  
Reports Analysis Division

**DISBURSEMENT SCHEDULE H4**  
(Effective 1/1/91)

**JOINT FEDERAL/NON-FEDERAL  
 ACTIVITY SCHEDULE**

**NAME OF COMMITTEE**  
 South Carolina Republican Party

FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL %	NON-FEDERAL %
SC State Election	Candidate Filing	04/10/2000	33,912.00	22,042.80	11,869.20
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 63,522.08 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
John Darby 1533 Lonsford Drive Columbia, SC 29206-	Payroll	04/15/2000	1,482.23	963.45	518.78
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 65,035.21 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
Bell Atlantic 80 International Drive 4500 Greenville, SC 29615-	Mobile Phone	04/15/2000	469.25	305.03	164.25
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 65,474.49 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
Bank of America 1300 Gervais Street Columbia, SC 29201-	Federal Taxes	04/15/2000	3,654.50	2,378.43	1,279.07
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 69,128.99 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
Bank of America 1300 Gervais Street Columbia, SC 29201-	State Taxes	04/15/2000	669.00	434.85	234.15
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR TO DATE: 69,797.99 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					

TFM

SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE	40,187.01	26,121.56	14,065.45
TOTAL THIS PERIOD (See page for each line only) (Fed. Share line and non-fed. share)			
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (See line 30 of the detailed summary page)			

