



Beaufort County Republican Party
Bringing good people and good ideas to government.

January 11, 2007

Norma Stewart
Treasurer

Office of General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Also Faxed to: 202-219-3923

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
2007 JAN 17 A 9 53

Re: Complaint against the Beaufort County, South Carolina Republican Party,
MUR 5891

As newly appointed treasurer of the Beaufort County Republican Party, (Harold Weiss is deceased), the information provided below responds to the points made by Randolph Bates. Please note that no specific and/or direct advertising was done for Congressman Joe Wilson, or any other candidate. All advertisements and flyers supported the 32 state and local Republican candidates and 1 federal Republican candidate who appeared on local ballots. We therefore submit that the amount spent for each candidate, including Congressman Wilson, was the total expenditures divided by the number of candidates mentioned in each point. Using this approach indicates that \$254.07 was expended on behalf of Congressman Wilson, which is well below the \$1,000 threshold required by the Federal Election Commission regulation guidelines.

1. Advertisements in local newspapers advocated the election of all 33 Republican candidates appearing on local ballots, including Congressman Wilson. The monies spent for this advertising totaled $\$6,342.77/33 = \192.21 per candidate.

We believe that the appearance of the Beaufort County Republican Party logo and the full name and contact information on every advertisement was sufficient as a disclaimer.

2. We prepared and mailed 700 letters to the Beaufort County Republican Party data base advocating the election of a federal candidate along with 32 state and local candidates. The total cost was $\$431.71/33 = \13.08 .
3. We transmitted e-mails to the Beaufort County Republican Party data base advocating the election of 33 Republican candidates. The total cost of this activity was zero.

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4. Our phone bank operations in the southern portion of Beaufort County were operated out of volunteer homes by volunteers at no cost, the cost of telephones for our northern headquarters, which supported the election of 23 candidates, one of whom was U.S. Congressman Joe Wilson, was \$916.08/23 = \$39.83 per candidate for our northern phone bank operations.
 5. We made a contribution of \$100 to our federal candidate; however, the check was returned to us with thanks, and voided. Actual cost = \$.39 for outgoing postage.
 6. Flyer printing and distribution, cost was \$282.45, distribution was by volunteers and available at our Executive Committee Meeting. Total cost \$282.45/33 = \$8.56 per candidate.

Beaufort County Republican Party will complete its filings with the state of South Carolina in a timely fashion, and all expenditures will be reported.

The total expenditure for Congressman Joe Wilson for 2006 was \$254.07; to the best of our knowledge no paperwork is required to be filed with the Federal Election Commission.

We regret that the Federal Election Commission was asked to expend time and resources on this issue.

Sincerely,



Norma G. Stewart, Treasurer
Beaufort County Republican Party

Cc: Bea Beamer, SC Republican Party Bookkeeper
Scott Malyerck, SC Republican Party Executive Director
Katon Dawson, SC Republican Party Chairman
Todd Kincannon, SC Republican Party Parliamentarian
Butch Wallace, District Director, Congressman Joe Wilson's office

Menerive E. Scriven
Expires 10-5-09

