



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 25, 1997

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE WASHINGTON STATE REPUBLICAN
PARTY-FEDERAL ACCOUNT

This is a referral of the Washington State Republican Party-Federal Account ("the Committee") for transferring non-federal funds into its federal account for disbursements which were not shared allocable expenses, and for receiving excessive transfers from its non-federal account for shared activity totalling \$365,520.11 in 1996. According to the 1995-1996 RAD Review and Referral Procedures for Unauthorized Committees (Standards 5 and 13), this matter requires further examination by your office.

In addition, the Committee transferred non-federal funds into its federal account to pay for 100% non-federal activity. These payments should have initially been made out of the non-federal account.

The Committee was referred on June 6, 1997, for a possible 2 U.S.C. §438(b) audit covering the 1995-1996 election cycle. The Commission, on June 24, 1997, did not vote to audit the Committee (RAD Referral #A97-124).

If you have any questions regarding this matter, please contact Andrea Wilkens at 219-3580.

Attachment

REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: August 25, 1997

ANALYST: Andrea Wilkens

- I. COMMITTEE: Washington State Republican Party-Federal
Account (C00031088)
Al Symington, Treasurer
16400 Southcenter Parkway, Suite 200
Seattle, WA 98138
- II. RELEVANT STATUTE: 11 CFR §106.5
11 CFR §102.5 (a)(1)(i)
- III. BACKGROUND:

Impermissible Receipt of Non-Federal Funds into the Federal Account and
Receipt of Excessive Funds from Non-Federal Account for Shared Activities

The Washington State Republican Party-Federal Account ("the Committee") received excessive transfers from its non-federal account totalling \$285,316.22 for shared activity during the 1996 30 Day Post-General reporting period. Any amount that fell outside of 10 days before and 60 days after payment was made by the Committee, was deemed excessive. During the same reporting period, the Committee also received \$80,203.89 in transfers from its nonfederal account for disbursements which were for 100% nonfederal fundraising events.

The Committee's report disclosed a \$378,067.75 difference between the total on Line 18, Column A (for transfers from its nonfederal account for shared activity) and Line 21(a)(ii), Column A (the nonfederal share of joint activity). It also disclosed \$95,016.51 on Schedule H4 in disbursements which were listed as 100% nonfederal fundraising events (Attachment 2).

On February 26, 1997, a Request for Additional Information ("RFAI") was sent to the Committee referencing the 1996 30 Day Post-General Report. The RFAI notified the Committee that its report disclosed \$91,473.41¹ in impermissible transfers-in from the non-federal account for 100% non-federal fundraising events, as well as for transfers-in which were outside of the permissible 70-day time period. The RFAI requested that the Committee specify how much money was over-transferred during each reporting period, and recommended that the Committee immediately transfer the total amount received outside of the 70-day time period back to the non-federal account (Attachment 3).

On March 12, 1997, the Committee filed a written request for an additional fifteen (15) days to respond to the RFAI (Attachment 4).

On March 20, 1997, a Second Notice was sent to the Committee for failure to adequately respond to the RFAI (Attachment 5).

On April 8, 1997, the Committee filed an amended 1996 30 Day Post-General Report. The Committee confirmed that it reimbursed its federal account for 100% non-federal activity. Its amended Schedules H4 disclosed \$80,203.89 in disbursements for 100% nonfederal activity. In addition, the Committee asserted that due to bookkeeping errors, the Committee transferred in \$285,316.22 more from its non-federal account than it should have. The Committee also stated that it had established a loan payment system to its non-federal account, and would likely have the loan repaid to its non-federal account by June 1997 (Attachment 6).

On May 1, 1997, an RFAI was sent to the Committee referencing the Committee's Amended 30 Day Post-General Report. The RFAI requested that the Committee specify how much money (out of the \$285,316.22) was over-transferred during each reporting period. The RFAI recommended that the Committee immediately transfer the total amount received by the federal account back to the non-federal account (Attachment 7).

On May 21, 1997, the RAD analyst was contacted by Jim Coats, a representative of the Committee, to discuss the Committee's Amended 30 Day Post-General Report. Mr. Coats sought an explanation as to why it was incorrect for the Committee to have co-mingled federal and non-federal funds for the fundraisers in question. The analyst explained the process and informed Mr. Coats that the Committee should correct the excessive transfers-in by transferring the funds back to the non-federal account as soon as possible (Attachment 8).

¹ This amount does not include an additional entry of \$3,542.10 in the figure referenced in the RFAI.

On May 22, 1997, a Second Notice was sent to the Committee for failure to respond in writing to the RFAI (Attachment 9).

On May 23, 1997, the Committee responded to the Second Notice with a written request for a five day extension (Attachment 10).

On May 30, 1997, the Committee filed an Amended 30 Day Post-General Report asserting that it over-transferred the entire sum of \$285,316.22 between the dates of 10/16/96 and 11/25/96. Regarding the reimbursement to its federal account for 100% non-federal activity, the Committee stated that it has added this \$80,203.89 amount to the over-transferred total. These amounts are reported on Schedule D of this amendment. According to the Committee, the over-transferred amount as of November 25, 1996, totals \$365,520.11 (Attachment 11).

On July 31, 1997, the Committee filed its 1997 Mid-Year Report. The report included a Schedule B which discloses payments totalling \$126,000 to the non-federal account to "repay loan". The repayments were made between January 15 and June 15, 1997 (Attachment 12).

FEDERAL ELECTION COMMISSION
1997-1998

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

Attachment 1

DATE 21AUG97

PAGE 1 of 3

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
					TYPE OF FILER	
WASHINGTON STATE REPUBLICAN PARTY-FEDERAL ACCOUNT				ID #C00031088	PARTY QUALIFIED	
CONNECTED ORGANIZATION: WASHINGTON REPUBLICAN PARTY						
	1997 STATEMENT OF ORGANIZATION - AMENDMENT			3MAR97	2	97FEC/187/3129
	MID-YEAR REPORT	726,114	736,831	1JAN97 -30JUN97	135	97FEC/229/2006
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN97 -30JUN97	2	97FEC/234/2942
	TOTAL	726,114	0 736,831	0	139	TOTAL PAGES

The reports listed have not been reviewed.

Ending cash on hand as of 6/30/97: \$ 475.97

Debts & obligations owed to the Committee: \$0.00 *

Debts & obligations owed by the Committee: \$0.00 *

* The Summary Page discloses these amounts as \$0.00. No Schedule(s) D were filed to determine if debts owed by the Committee have been extinguished. There is no evidence on disbursement schedules that full payments were made during the reporting period.

FEDERAL ELECTION COMMISSION
1995-1996

DATE 21AUG97

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

Attachment 1

PAGE 2 of 3

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF	MICROFILM
					PAGES	LOCATION
				TYPE OF FILER		
WASHINGTON STATE REPUBLICAN PARTY-FEDERAL ACCOUNT				ID #C00031088	PARTY QUALIFIED	
CONNECTED ORGANIZATION: WASHINGTON REPUBLICAN PARTY						
1995 STATEMENT OF ORGANIZATION - AMENDMENT				20JAN95	2	95FEC/958/4389
	MID-YEAR REPORT	827,445	843,223	1JAN95 -30JUN95	144	95FEC/990/0997
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN95 -30JUN95	13	95FEC/002/1474
	MID-YEAR REPORT - AMENDMENT	827,445	843,223	1JAN95 -30JUN95	8	95FEC/005/0118
	REQUEST FOR ADDITIONAL INFORMATION			1JAN95 -30JUN95	3	95FEC/999/4760
	YEAR-END	1,383,941	1,332,603	1JUL95 -31DEC95	214	96FEC/029/0276
	YEAR-END - AMENDMENT	1,383,941	1,332,603	1JUL95 -31DEC95	2	96FEC/028/3814
	YEAR-END - AMENDMENT	-	-	1JUN95 -31DEC95	44	96FEC/033/1847
	YEAR-END - AMENDMENT	-	-	1JUN95 -31DEC95	7	96FEC/046/3056
	YEAR-END - AMENDMENT	927,364	876,024	1JUL95 -31DEC95	10	96FEC/047/1157
	YEAR-END - AMENDMENT	927,363	876,023	1JUL95 -31DEC95	15	96FEC/051/2057
	REQUEST FOR ADDITIONAL INFORMATION			1JUL95 -31DEC95	3	96FEC/037/4837
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL95 -31DEC95	4	96FEC/047/5030
1996	APRIL QUARTERLY	693,592	710,351	1JAN96 -31MAR96	107	96FEC/043/2449
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN96 -31MAR96	16	96FEC/048/0500
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN96 -31MAR96	3	96FEC/053/0686
	APRIL QUARTERLY - AMENDMENT	693,592	710,351	1JAN96 -31MAR96	13	96FEC/056/1339
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN96 -31MAR96	4	96FEC/061/4416
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN96 -31MAR96	17	96FEC/071/0579
	REQUEST FOR ADDITIONAL INFORMATION			1JAN96 -31MAR96	3	96FEC/054/5048
	JULY QUARTERLY	1,601,452	1,627,130	1APR96 -30JUN96	151	96FEC/066/0303
	JULY QUARTERLY - AMENDMENT	1,601,452	1,627,130	1APR96 -30JUN96	13	96FEC/070/1507
	JULY QUARTERLY - AMENDMENT	-	-	1APR96 -30JUN96	1	96FEC/071/0890
	JULY QUARTERLY - AMENDMENT	-	-	1APR96 -30JUN96	10	96FEC/082/3451
	JULY QUARTERLY - AMENDMENT	-	-	1APR96 -30JUN96	2	96FEC/084/0590
	JULY QUARTERLY - AMENDMENT	-	-	1APR96 -30JUN96	13	96FEC/091/3746
	JULY QUARTERLY - AMENDMENT	-	-	1APR96 -30JUN96	2	97FEC/188/2231
	JULY QUARTERLY - AMENDMENT	-	-	1APR96 -30JUN96	2	97FEC/188/2233
	REQUEST FOR ADDITIONAL INFORMATION			1APR96 -30JUN96	5	96FEC/078/3526
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR96 -30JUN96	2	96FEC/084/3595
	PRE-PRIMARY	958,576	929,301	1JUL96 -28AUG96	85	96FEC/076/4781
	PRE-PRIMARY - AMENDMENT	-	-	1JUL96 -28AUG96	10	96FEC/080/4566
	PRE-PRIMARY - AMENDMENT	958,576	929,301	1JUL96 -28AUG96	6	97FEC/184/3157
	PRE-PRIMARY - AMENDMENT	-	-	1JUL96 -28AUG96	2	97FEC/188/2227
	PRE-PRIMARY - AMENDMENT	-	-	1JUL96 -28AUG96	7	97FEC/193/0988
	REQUEST FOR ADDITIONAL INFORMATION			1JUL96 -28AUG96	3	97FEC/171/4742
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL96 -28AUG96	3	97FEC/189/3809
	PRE-GENERAL	1,357,876	1,352,618	29AUG96 -15OCT96	81	96FEC/120/2317
	PRE-GENERAL - AMENDMENT	-	-	29AUG96 -15OCT96	2	97FEC/185/0359

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES TYPE OF FILER	MICROFILM LOCATION
	PRE-GENERAL - AMENDMENT -	-	-	29AUG96 -15OCT96	2	97FEC/188/2229
	PRE-GENERAL - AMENDMENT -	-	-	29AUG96 -15OCT96	2	97FEC/188/2235
	PRE-GENERAL - AMENDMENT 1,357,876		1,352,618	29AUG96 -15OCT96	65	97FEC/189/0853
	REQUEST FOR ADDITIONAL INFORMATION			29AUG96 -15OCT96	5	97FEC/171/4737
	REQUEST FOR ADDITIONAL INFORMATION 2ND			29AUG96 -15OCT96	2	97FEC/186/0828
	POST-GENERAL 1,408,817		1,354,629	16OCT96 -25NOV96	73	96FEC/152/4013
	POST-GENERAL - AMENDMENT -	-	-	16OCT96 -25NOV96	11	97FEC/188/2216
	POST-GENERAL - AMENDMENT 1,408,817		1,354,629	16OCT96 -25NOV96	24	97FEC/195/4789
	POST-GENERAL - AMENDMENT -	-	-	16OCT96 -25NOV96	2	97FEC/205/0830
	POST-GENERAL - AMENDMENT 1,408,857		1,354,669	16OCT96 -25NOV96	26	97FEC/206/3518
	REQUEST FOR ADDITIONAL INFORMATION			16OCT96 -25NOV96	6	97FEC/186/4191
	REQUEST FOR ADDITIONAL INFORMATION 2ND			16OCT96 -25NOV96	6	97FEC/191/3411
	REQUEST FOR ADDITIONAL INFORMATION			16OCT96 -25NOV96	3	97FEC/200/1145
	REQUEST FOR ADDITIONAL INFORMATION 2ND			17OCT96 -25NOV96	4	97FEC/204/3829
	YEAR-END 85,730		168,447	26NOV96 -31DEC96	44	97FEC/180/1828
	YEAR-END - AMENDMENT -	-	-	26NOV96 -31DEC96	10	97FEC/188/2206
	YEAR-END - AMENDMENT -	-	-	26NOV96 -31DEC96	4	97FEC/193/4509
	YEAR-END - AMENDMENT 85,730		168,447	26NOV96 -31DEC96	19	97FEC/206/3499
	REQUEST FOR ADDITIONAL INFORMATION			26NOV96 -31DEC96	3	97FEC/190/4319
	REQUEST FOR ADDITIONAL INFORMATION			26NOV96 -31DEC96	3	97FEC/194/3056
	REQUEST FOR ADDITIONAL INFORMATION 2ND			26NOV96 -31DEC96	4	97FEC/200/4298
1997	MISCELLANEOUS REPORT TO FEC			12MAR97	2	97FEC/189/2919
	MISCELLANEOUS REPORT TO FEC			16MAY97	2	97FEC/202/4646
	TOTAL	7,860,891	0 7,861,762	0	1354	TOTAL PAGES

All reports listed have been reviewed.

Ending cash on hand as of 12/31/96: \$11,192.45

Debts & obligations owed to the Committee: \$0.00

Debts & obligations owed by the Committee: \$424,221.62

DETAILED SUMMARY PAGE **OF RECEIPTS AND DISBURSEMENTS** **PAGE 2, FEC FORM 3X**

Attachment 2

Page 1 of 4

(revised 1/1/91)

NAME OF COMMITTEE

Washington State Republican Party - Federal

REPORT COVERING PERIOD

FROM 10-16-96

TO 11-25-96

COLUMN A
Total This PeriodCOLUMN B
Calendar Year**I. Receipts**

11. Contributions (other than loans) From:

a. Individual/Persons Other Than Political Committees

i. Itemized (use Schedule A)

ii. Unitemized

iii. Total (add i and ii) >

b. Political Party Committees

c. Other Political Committees (such as PACs)

d. Total Contributions (add a iii, b and c) >

12. Transfers From Affiliated/Other Party Committees

13. All Loans Received

14. Loan Repayments Received

15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)

16. Refunds of Contributions Made to Federal Candidates and Other Political Committees

17. Other Federal Receipts (Dividends, Interest, etc.)

18. Transfers from Nonfederal Account for Joint Activity

19. Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18) >

20. Total Federal Receipts (subtract line 18 from line 19) >

II. Disbursements

21. Operating Expenditures:

a. Shared Federal/Non-Federal Activity (from Schedule H4)

i. Federal Share

ii. Non-Federal Share

b. Other Federal Operating Expenditures

c. Total Operating Expenditures (add a i, a ii, and b) >

22. Transfers to Affiliated/Other Party Committees

23. Contributions to Federal Candidates/Committees and Other Political Committees

24. Independent Expenditures (use Schedule E)

25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F) ..

26. Loan Repayments Made

27. Loans Made

28. Refunds of Contributions To:

a. Individuals/Persons Other Than Political Committees

b. Political Party Committees

c. Other Political Committees (such as PACs)

d. Total Contribution Refunds (add a, b and c) >

29. Other Disbursements

30. Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >

31. Total Federal Disbursements (subtract line 21 a ii from line 30) >

III. Net Contributions/Operating Expenditures

32. Total Contributions (other than loans)(from line 11d)

33. Total Contribution Refunds (from line 28d)

34. Net Contributions (other than loans)(subtract line 33 from 32)

35. Total Federal Operating Expenditures (add 21 a i and 21 b) >

36. Offsets to Operating Expenditures (from line 15)

37. Net Operating Expenditures (subtract line 36 from 35) >

11(a)(i)

11(a)(ii)

11(a)(iii)

11(b)

11(c)

11(d)

12

13

14

15

16

17

18

19

20

21(a)(i)

21(a)(ii)

21(b)

21(c)

22

23

24

25

26

27

28(a)

28(b)

28(c)

28(d)

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SAMPLE

Fundraise

NAME OF COMMITTEE

Washington State Republican Party - Federal

A. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Worth Glass Mail 15520 Woodinville Rd Bldg D Ste 200 Road Woodinville Wa	V-96 Rem Fundraise MAIL	10-22-96	4656 ¹²		4656 ¹²
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
B. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
U.S. Postmaster Seattle Wa	V-46-KRM Fundraise postage	10-29-96	6379 ²⁹		6379 ²⁹
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
C. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Olympus Press/Inc 3400 South 150th St Seattle Wa	FD place cards	10-30-96	186 ¹⁰		186 ¹⁰
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
D. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
E. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
F. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 59536.46 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE			11221.51		11221.51
TOTAL THIS PERIOD (last page for each line only)(Fed. share to 21 a 1 and non-Fed. share to 21 a 2)			116219 ¹⁸	6795.53	109423.6
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for line 31 of the detailed summary page)					

SAMPLE

Fundraise

NAME OF COMMITTEE

Washington State Republican Party - Federal

A. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Strategic Telecommunications 2402 University Ave W St Paul, MN	P-609 Telemarket	10-24-96	922 ³⁵	313 ⁶⁰	608 ⁷⁵
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ DIRECT CANDIDATE SUPPORT					
B. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Strategic Telecommunications 2402 University Ave W St Paul MN	P-610 Telemarket	10-24-96	8247 ⁴⁰	2886 ⁵⁹	5360 ⁸¹
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ DIRECT CANDIDATE SUPPORT					
C. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
World Class Mailing 15520 Woodinville Rd Bldg D Ste 200 Woodinville WA	Bub Fund RAISE LTR	10-25-96	5456 ⁹³		5456 ⁹³
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ DIRECT CANDIDATE SUPPORT					
D. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
World Class Mailing 15520 Woodinville Rd Bldg D Ste 200 Woodinville WA	Leg Fundraise LTR	10-25-96	3387.67		3387 ⁶¹
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ DIRECT CANDIDATE SUPPORT					
E. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Century Direct 4355 NW Quimby Portland, Ore	Leg Fundraise LTR	11-8-96	6981 ⁰⁰		6981 ⁰⁰
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ DIRECT CANDIDATE SUPPORT					
F. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Strategic Telecom 2402 University Ave W St. Paul, MN	L-602 Telemarketing	11-6-96	900 ⁸⁵		900 ⁸⁵
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$514834.95 DIRECT CANDIDATE SUPPORT					
SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE			25896.20	3200.19	22696.01
TOTAL THIS PERIOD (last page for each line only) (Fed. share to 21 a i and non-Fed. share to 21 a ii)			104997.67	6795.53	98202 ¹¹
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for line 31 of the detailed summary page)					

SAMPLE

Fundraising

NAME OF COMMITTEE

Washington State Republican Party - Federal

A. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Strategic Telecomm 2402 University Ave W Ste 602 St. Paul, MN	P-610 Phone Bank	10-30-96	4746 ¹⁵	35 1661 ¹⁶	65 3084.99
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ DIRECT CANDIDATE SUPPORT					
B. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Ode 11 Roger & Rose 7700 Leesburg Pike Falls Church, Va 22037	Y-96-Kam Fundraise Letter	10-17-96	3000 ⁰⁰		0 3000
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ DIRECT CANDIDATE SUPPORT					
C. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Century Direct 2355 NW Quimby Portland, OR	Y-96-Lor Printing Production	10-23-96	9769 ⁹²	16 1563 ¹⁹	8 8206 ⁷¹
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ DIRECT CANDIDATE SUPPORT					
D. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Strategic Telecommunications 2402 University Ave W Ste 602 St Paul, MN	P-610 Telemarketing	10-24-96	1059 ⁹⁵	35 370 ⁹⁹	65 688.96
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ DIRECT CANDIDATE SUPPORT					
E. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Century Direct 2355 NW Quimby Portland, OR	TV Ad Fundraise Print Production	10-25-96	59,200 ⁰⁰		100 59200
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ DIRECT CANDIDATE SUPPORT					
F. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Susan Foster Flowers 3124 Elliot Ave Seattle WA	FD Flowers	10-30-96	1325 ¹⁵		1325 ¹⁴
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$5/2,2418.75 DIRECT CANDIDATE SUPPORT					
SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE			79101.47	3595.34	75506.1
TOTAL THIS PERIOD (last page for each line only)(Fed. share to 21 a i and non-Fed. share to 21 a ii)			79101.47	3595.34	75506.1
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for line 31 of the detailed summary page)					



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Al Symington, Treasurer
Washington State Republican Party
16400 Southcenter Parkway, Suite 200
Seattle, WA 98188

FEB 26 1997

Identification Number: C00031083

Reference: 30 Day Post-General Report (10/16/96-11/25/96)

Dear Mr. Symington:

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:

-You must make an attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may demonstrate "best efforts" to obtain the required information by providing the Commission with a description of its procedures for requesting the information and may also supply a copy of a solicitation: the committee must request the contributor information in initial solicitations; make follow-up requests (if necessary); report the information; and file amendments to disclose previously unreported information. Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make an additional written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that

WASHINGTON STATE REPUBLICAN PARTY
PAGE 2

was not provided by the contributor, but is available in any of the committee's records for that current election cycle. Furthermore, if a committee receives contributor information after the contributions have been reported, it must submit, with its next report, an amended memo Schedule A listing all the contributions for which additional information was received or file, on or before the next reporting date, amendments to the previous reports on which the contributions were originally disclosed. See 11 CFR §104.3(a)(4)(i) and 11 CFR §104.7.

-Your calculations for Line 31, Columns A and B appear to be incorrect. FEC calculations disclose this amount(s) to be \$400,936.94 and \$1,863,768.68, respectively. Please provide the corrected total(s) on the Detailed Summary Page.

-Schedule H2 indicates the allocation ratio for Telemarketing P-609 and Direct Mail V-96-GOR were revised during the reporting period. Please provide the date on which this revision became effective. In the event that an excessive non-federal transfer was received, the excessive amount should be transferred back to your non-federal account.

-On Schedule H2, you disclose the ratio for Telemarketing P-610 to be the same as previously reported; however, it appears that this activity/event was not previously reported. Please amend your report to clarify this discrepancy. 11 CFR §104.10(a)(1)

-Schedule H3 discloses receipt of \$91,473.41 from your non-federal account for fundraising events which are listed as 100% non-federal on Schedules H2 and H4. A committee is permitted to pay the entire amount of an allocable activity from its federal account and receive a transfer(s) from its non-federal account solely to cover the non-federal share of the allocable expense(s). 11 CFR §106.5(g)(i). However, 100% non-federal fundraising events do not fall within the definitions of allocable expenses, and constitute an impermissible transfer of funds received by your federal account from your non-federal account.

The Commission recommends you immediately transfer the total amount received by your federal account back to your non-federal account.

**WASHINGTON STATE REPUBLICAN PARTY
PAGE 3**

Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Please clarify all expenditures made for GOTV (such as TV and radio ads, phone banks & printing), the Kasich event and polling & surveys on Schedules B and H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or F supporting Line 23 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

-Schedule H3 of your report discloses transfers received from your non-federal account which occur outside the permissible transfer period. Please be advised that transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of these transfers-in from the non-federal account.

The Commission recommends that you immediately transfer the total excessive amount received by your federal account outside the 70-day time period 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 failed to include the total EVENT YEAR-TO-DATE amount for a payment(s) to several vendors. Please amend your report to include the missing EVENT YEAR-TO-DATE total(s).

-Schedule H4 of your report discloses a payment to Targeted Creative Communications as an in-kind transfer from the Republican National Committee. There is no indication of receipt of the federal portion (totaling \$764.00) listed on Schedule A of your report. Please amend your report to disclose this payment.

-Schedule H3 of your report (pertinent portion attached) discloses a transfer-in from the Republican National Committee to pay for the Administrative/Voter Drive expenses of your committee. Please note that

WASHINGTON STATE REPUBLICAN PARTY
PAGE 4

11 CFR §106.5 (g)(1)(i) permits a committee to "pay the entire amount of an allocable expense from its federal account and shall transfer from its non-federal account to its federal account solely to cover the non-federal share of that allocable expense" (emphasis added). As the Republican National Committee is not a non-federal account of your committee, such a transfer is prohibited.

If the transfer in question was incompletely or incorrectly disclosed you should amend your original report with clarifying information. If you have received a prohibited transfer, you must transfer-out the impermissible funds to an account not used to influence federal elections or refund the full amount to the Republican National Committee.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on 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 transfers, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

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. My local number is (202) 219-3580.

Sincerely,



Andrea Wilkens
Reports Analyst
Reports Analysis Division



WASHINGTON STATE REPUBLICAN PARTY

DALE FOREMAN • CHAIRMAN

FEDERAL ELECTION
COMMISSION MAIL ROOM

MAR 12 11 06 AM '97

March 10, 1997

Andrea Wilkins
Reports Analyst
Federal Election Commission
Washington D.C. 20463

RE: Identification Number: C00031088
Reference: 30 Day Post-General Report (10/16/96-11/25/96)

Dear Ms Wilkins:

The Washington State Republican party received your letter dated February 26, 1997 on March 3, 1997 regarding the above report. At this time we request an extension of 15 days (additional to the original 15) in order to respond to your letter.

Thank you for your assistance.

Respectfully,

Roma L. Zubrod
Deputy Treasurer

2010-04-29 10:31:33



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

March 20, 1997

Al Symington, Treasurer
Washington State Republican Party-
Federal Account
16400 Southcenter Parkway, Suite 200
Seattle, WA 98188

Identification Number: C00031088

Reference: 30 Day Post-General Report (10/16/96-11/25/96)

Dear Mr. Symington:

On February 26, 1997 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your March 5, 1997 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-Your calculations for Line 31, Columns A and B appear to be incorrect. FEC calculations disclose this amount(s) to be \$400, 936.94 and \$1,863, 768.68 respectively. Please provide the corrected total(s) on the Detailed Summary Page.

-Schedule H2 indicates the allocation ratio for Telemarketing P-609 and Direct Mail V-96-GOR were revised during the reporting period. Please provide the date on which this revision became effective. In the event that an excessive non-federal transfer was received, the excessive amount should be transferred back to your non-federal account.

-On Schedule H2, you disclose the ratio for Telemarketing P-610 to be the same as previously reported; however, it appears that this activity/event was not previously reported. Please amend your report to clarify this discrepancy. 11 CFR §104.10(a)(1)

**WASHINGTON STATE REPUBLICAN PARTY-FEDERAL ACCOUNT
PAGE 2**

-Schedule H3 discloses receipt of \$91,473.41 from your non-federal account for fundraising events which are listed as 100% non-federal on Schedules H2 and H4. A committee is permitted to pay the entire amount of an allocable activity from its federal account and receive a transfer(s) from its non-federal account solely to cover the non-federal share of the allocable expense(s). 11 CFR §106.5(g)(i). However, 100% non-federal fundraising events do not fall within the definitions of allocable expenses, and constitute an impermissible transfer of funds received by your federal account from your non-federal account.

The Commission recommends you immediately transfer the total amount received by your federal account 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.

-Please clarify all expenditures made for GOTV (such as TV and radio ads, phone banks & printing), the Kasich event and polling & surveys on Schedules B and H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or F supporting Line 23 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

-Schedule H3 of your report discloses transfers received from your non-federal account which occur outside the permissible transfer period. Please be advised that transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of these transfers-in from the non-federal account.

The Commission recommends that you immediately transfer the total excessive amount received by your federal account outside the 70-day time period 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 failed to include the total EVENT YEAR-TO-DATE amount for a

**WASHINGTON STATE REPUBLICAN PARTY-FEDERAL ACCOUNT
PAGE 3**

payment(s) to several vendors. Please amend your report to include the missing **EVENT YEAR-TO-DATE** total(s).

-Schedule H4 of your report discloses a payment to Targeted Creative Communications as an in-kind transfer from the Republican National Committee. There is no indication of receipt of the federal portion (totaling \$764.00) listed on Schedule A of your report. Please amend your report to disclose this payment.

-Schedule H3 of your report (pertinent portion attached) discloses a transfer-in from the Republican National Committee to pay for Administrative/Voter Drive expenses of your committee. Please note that 11 CFR 106.5 (g)(1)(i) permits a committee to "pay the entire amount of an allocable expense from its federal account and shall transfer from its non-federal account to its federal account solely to cover the non-federal share of that allocable expense" (emphasis added). As the Republican National Committee is not a non-federal account of your committee, such a transfer is prohibited.

If the transfer in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have received a prohibited transfer, you must transfer-out the impermissible funds to an account not used to influence federal elections or refund the full amount to the Republican National Committee.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on 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 transfers, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

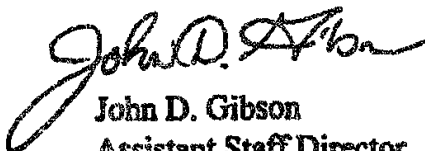
2014-04-23 16:33:16

**WASHINGTON STATE REPUBLICAN PARTY-FEDERAL ACCOUNT
PAGE 4**

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Andrea Wilkens on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,



John D. Gibson
Assistant Staff Director
Reports Analysis Division

200403963312



WASHINGTON STATE REPUBLICAN PARTY

DALE FOREMAN • CHAIRMAN

APR 8 11 14 AM '97

April 4, 1997

John D. Gibson, Assistant Staff Director
Andrea Wilkens, Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington D.C. 20463

Identification Number: C00031088

RE: 30 Day Post-General Report (10/16/96-11/25/96)

Dear Ms. Wilkins:

In response to your correspondence dated March 20, 1997 regarding the above referenced report, we submit the following:

We concur that calculations for Line 31, Columns A and B were incorrect. Attached is amended Detailed Summary Page with corrected calculations for Line 31, Columns A and B. As a result of revisions relating to other findings in your letter, the amounts have been updated on the attached, revised Detailed Summary Page.

Schedule H2 indicates the allocation ratio for Telemarketing P-609 and Direct Mail V-96-GOR were revised during the reporting period. In response to your letter dated January 29, 1997, we revised our August 29, 1996-October 15, 1996 report on March 3, 1997 to reflect the correct ratios during that period. Attached is amended H2 which reflects the state/federal allocations which were finally attained on the various fundraising activities.

Schedule H2 ratio for Telemarketing P-610 was shown as previously reported; this activity had not been previously reported. Attached is amended H2 with correction to "New".

B.H. Schedule H3 discloses receipts of non-federal dollars to reimburse for the cost of fundraising expenses which were 100% non-federal. At the time these payments were made we were under the erroneous understanding that any fundraising expense, even if 100% of the proceeds were going into the state account, could be paid out of the federal account and later reimbursed. In the case of the activities labeled "V-96-Kem", "FD", "TV Ad", and "Gub", the reimbursement did not result in any benefit to a federal candidate. The reimbursement shown on revised Schedule H3 is simply the correction of an error. The payments should have been made out of the state account initially.

30 Day Post-General Report (10/16/96-11/25/96)

Identification Number: C00031088

April 4, 1997

Page 2

Expenditures made for Flowers-Kasich Fundraiser, Kemp Event, and McCain travel were not made on behalf of any candidate. Kasich, Kemp and McCain were speakers at these fundraising events, and these descriptions were identifiers for internal use. The events were fundraisers to solely benefit the state party.

B.H. We have determined that during the campaign our bookkeeper was overwhelmed by the volume of transactions and failed to keep proper track of the capacity to transfer funds to the federal account. As a result we transferred \$285,316.22 more from the state account than we should have.

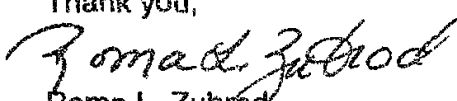
To correctly reflect our excessive transfers we have recorded a loan payable to the state account. Starting in January 1997 we have begun repaying the loan, and we expect that by the end of June 1997 it will be fully retired.

Due to the fact that we had not computerized our FEC reporting, it has been very time consuming to calculate the correct amounts. Our revised reports reflect our best efforts to provide such corrections.

Schedule H4 supporting Line 21(a) of the Detailed Summary Page, failed to include the total EVENT YEAR-TO-DATE amount for payments to several vendors. Attached are amended Schedule H4s with total EVENT YEAR-TO-DATE amounts.

Schedule H4 discloses a payment to Targeted Creative Communications as an in-kind transfer from the Republican National Committee. No indication of the receipt of the federal portion (totaling \$764.00) was listed on Schedule A of the report. We concur; attached is amended Schedule A showing the in-kind receipt. We have also annotated Schedule H3, page 8, to clarify that the transfer represented the non-federal share of the generic activity.

Thank you,


Roma L. Zubrod
Deputy Treasurer

Encl.

REPORT OF RECEIPTS AND DISBURSEMENT

Attachment 6

Page 3 of 8

For Other Than An Authorized Committee
(Summary Page)FEDERAL ELECTION
COMMISSION MAIL ROOM

APR 8 11 34 AM '97

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <i>Washington State Republican Party Federal</i>		2. FEC IDENTIFICATION NUMBER <i>C 000 310.88</i>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <i>16400 Southcenter Parkway #200</i>		
CITY, STATE and ZIP CODE <i>Seattle Wa 98188</i>		
3. <input checked="" type="checkbox"/> This committee has qualified as a multicandidate committee. (see FEC FORM 1M)		

4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report

Monthly Report Due On:

- ☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____

☒ Thirtieth day report following the General Election on
Nov 5 in the State of WA

(b) Is this Report an Amendment?

☒ YES ☐ NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>10-16-96</u> through <u>11-25-96</u>		
6. (a) Cash on Hand January 1, 19 <u>96</u>		\$ 47623.78
(b) Cash on Hand at Beginning of Reporting Period	\$ 39 721.61	
(c) Total Receipts (from Line 19)	\$ 1408 817.85	\$ 6020316.66
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 144 8539.46	\$ 6067940.44
7. Total Disbursements (from Line 30)	\$ 135 4629.69	\$ 5974030.67
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 93 909.77	\$ 93909.77
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 993 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 49 948.01	
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.		

Type or Print Name of Treasurer

Roman Zybroid, Deputy Treasurer

Signature of Treasurer

Roman Zybroid

Date

4/04/97

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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FEC FORM 3X

(revised 9/93)

FF&AN101

Revised 4/04/97

DETAILED SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS PAGE 2, FEC FORM 3X

Attachment 6

Page 4 of 8

(revised 1/1/91)

OF COMMITTEE

Washington State Republican Party Federal

REPORT COVERING PERIOD

FROM 10-16-96 TO 11-25-96

		COLUMN A Total This Period	COLUMN B Calendar Year	
I. Receipts				
11.	Contributions (other than loans) From:			
a.	Individual/Persons Other Than Political Committees			
i.	Itemized (use Schedule A)	17970.00	189393.28	11(a)
ii.	Unitemized	26823.38	747108.59	11(a)
iii.	Total (add i and ii)	44793.38	936501.87	11(b)
b.	Political Party Committees		400.00	11(b)
c.	Other Political Committees (such as PACs)		5000.00	11(c)
d.	Total Contributions (add a iii, b and c)	44793.38	941901.87	11(d)
12.	Transfers From Affiliated/Other Party Committees	5000.00	688136.85	12
13.	All Loans Received	285,316.22	285,316.22	13
14.	Loan Repayments Received			14
15.	Offsets To Operating Expenditures (Refunds, Rebates, etc.)	27246.17	55369.05	15
16.	Refunds of Contributions Made to Federal Candidates and Other Political Committees			16
17.	Other Federal Receipts (Dividends, Interest, etc.)	17.80	50.02	17
18.	Transfers from Nonfederal Account for Joint Activity	1046444.28	1049542.65	18
19.	Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18)	1408817.85	602626.66	19
20.	Total Federal Receipts (subtract line 18 from line 19)	362,573.57	1970,774.01	20
II. Disbursements				
21.	Operating Expenditures:			
a.	Shared Federal/Non-Federal Activity (from Schedule H4)			
i.	Federal Share	249178.26	1133043.53	21(a)
ii.	Non-Federal Share	948438.42	3949697.90	21(a)
b.	Other Federal Operating Expenditures	120995.42	720,882.15	21(b)
c.	Total Operating Expenditures (add a i, a ii, and b)	1318612.10	5803623.58	21(c)
22.	Transfers to Affiliated/Other Party Committees		23184.62	22
23.	Contributions to Federal Candidates/Committees and Other Political Committees	8400.00	88400.00	23
24.	Independent Expenditures (use Schedule E)			24
25.	Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F)			25
26.	Loan Repayments Made			26
27.	Loans Made			27
28.	Refunds of Contributions To:			
a.	Individuals/Persons Other Than Political Committees		12629.00	28(a)
b.	Political Party Committees		451.00	28(b)
c.	Other Political Committees (such as PACs)			28(c)
d.	Total Contribution Refunds (add a, b and c)		13080.00	28(d)
29.	Other Disbursements	27617.59	45742.47	29
30.	Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29)	1354629.69	5974030.67	30
31.	Total Federal Disbursements (subtract line 21 a ii from line 30)	406191.27	2024332.77	31
III. Net Contributions/Operating Expenditures				
32.	Total Contributions (other than loans) (from line 11d)	44793.38	941901.87	32
33.	Total Contribution Refunds (from line 28d)	-0-	13,080.00	33
34.	Net Contributions (other than loans) (subtract line 33 from 32)	44793.38	928821.87	34
35.	Total Federal Operating Expenditures (add 21 a i and 21 b)	370,173.68	1853,925.68	35
36.	Offsets to Operating Expenditures (from line 15)	27246.17	55369.05	36
37.	Net Operating Expenditures (subtract line 36 from 35)	342,927.51	1,798,556.63	37

2004042396

SCHEDULE C
(Revised 3/80)

LOANS

Name of Committee (in Full) <u>Washington State Republican Party - Federal</u>			
A. Full Name, Mailing Address and ZIP Code of Loan Source <u>Washington State Republican Party</u> <u>State Exempt Account</u> <u>16400 South Center Pkwy, #200</u> <u>Seattle, WA 98818</u>		Original Amount of Loan <u>285,316.22</u>	Cumulative Payment To Date <u>—</u>
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <u>*</u>		Balance Outstanding at Close of This Period <u>285,316.22</u>	
Terms: Date Incurred <u>10/18/97</u> Date Due <u>6/30/97</u> Interest Rate <u>5</u> % (apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code <u>*Inadvertent over-transfer</u> <u>of non-federal amounts as</u> <u>explained in letter dated 4/4/97.</u>		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payment To Date
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Balance Outstanding at Close of This Period	
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
SUBTOTALS This Period This Page (optional)		<u>285,316.22</u>	
TOTALS This Period (last page in this line only)		<u>285,316.22</u>	
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

201043964002

Revised 4/4/97 Fundraising

NAME OF COMMITTEE

Washington State Republican Party - Federal

A. FULL NAME, MAILING ADDRESS & ZIP CODE Strategic Telecomm 2402 University Ave W Ste 602 St. Paul, MN	PURPOSE/EVENT P-610 Phone Bank	DATE 10-30-96	TOTAL AMOUNT 4746 ¹⁵	FEDERAL SHARE 35 4661 1993 ³⁸	NON-FEDERAL SHARE 65 3084.79 2752.77
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 291317.02 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
B. FULL NAME, MAILING ADDRESS & ZIP CODE Ode 11 Roper House 7700 Leesburg Pike Falls Church, Va	PURPOSE/EVENT V-96-Kam Fundraise letter	DATE 10-17-96	TOTAL AMOUNT 3000 ⁰⁰	FEDERAL SHARE	NON-FEDERAL SHARE 00 3000
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 294317.02 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
C. FULL NAME, MAILING ADDRESS & ZIP CODE Century Direct 2355 NW Quimby Portland, OR	PURPOSE/EVENT V-96-Dor Printing production	DATE 10-23-96	TOTAL AMOUNT 9769 ⁹²	FEDERAL SHARE 16 1563 2442.48	NON-FEDERAL SHARE 50 8206 7327.44
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 304086.94 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
D. FULL NAME, MAILING ADDRESS & ZIP CODE Strategic Telecommunications 2402 University Ave W Ste 602 St Paul, MN	PURPOSE/EVENT P 610 Tele marketing	DATE 10-24-96	TOTAL AMOUNT 1059 ⁹⁵	FEDERAL SHARE 35 370 445 ¹⁸	NON-FEDERAL SHARE 65 688.96 614.77
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 305146.89 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
E. FULL NAME, MAILING ADDRESS & ZIP CODE Century Direct 2355 NW Quimby Portland, OR	PURPOSE/EVENT TV Ad Fundraise print production	DATE 10-25-96	TOTAL AMOUNT 59,200 ⁰⁰	FEDERAL SHARE	NON-FEDERAL SHARE 100 59200 ⁰⁰
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 364346.89 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
F. FULL NAME, MAILING ADDRESS & ZIP CODE Susan Foster Flowers 3124 Elliot Ave Seattle WA	PURPOSE/EVENT FD Flowers	DATE 10-30-96	TOTAL AMOUNT 1325 ⁴⁵	FEDERAL SHARE	NON-FEDERAL SHARE 45 1325 ⁴⁵
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 365,672.34 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE			79101.47	3595.34	75506.13
TOTAL THIS PERIOD (last page for each line only)(Fed. share to 21 a i and non-Fed. share to 21 a ii)			79101.47	3595.34 4881.04	75506.13 74220.43
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for line 31 of the detailed summary page)					

Revised 4/04/97 Fundraise

NAME OF COMMITTEE

Washington State Republican Party - Federal

A. FULL NAME, MAILING ADDRESS & ZIP CODE Strategic Telecommunications 2402 University Ave W St Paul, MN	PURPOSE/EVENT P-609 Telemarket	DATE 10-24-96	TOTAL AMOUNT 922.35	FEDERAL SHARE 34 313.80 46.86	NON-FEDERAL SHARE 89 608.75 875.49
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 366,946.69 DIRECT CANDIDATE SUPPORT					
B. FULL NAME, MAILING ADDRESS & ZIP CODE Strategic Telecommunications 2402 University Ave W St Paul MN	PURPOSE/EVENT P-610 Telemarket	DATE 10-24-96	TOTAL AMOUNT 8247.40	FEDERAL SHARE 35 2886.57 3463.91	NON-FEDERAL SHARE 65 5360.81 4783.49
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 379,412.09 DIRECT CANDIDATE SUPPORT					
C. FULL NAME, MAILING ADDRESS & ZIP CODE World Class Mailing 15520 Woodinville Rd Bldg D Ste 200 Woodinville, WA	PURPOSE/EVENT Bub Fund LTR	DATE 10-25-96	TOTAL AMOUNT 5456.93	FEDERAL SHARE	NON-FEDERAL SHARE 100 5456.93
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 380,219.02 DIRECT CANDIDATE SUPPORT					
D. FULL NAME, MAILING ADDRESS & ZIP CODE World Class Mailing 15520 Woodinville Rd Bldg D Ste 200 Woodinville WA	PURPOSE/EVENT Leg Fundraise LTA	DATE 10-25-96	TOTAL AMOUNT 3387.67	FEDERAL SHARE 33.88	NON-FEDERAL SHARE 87 3387.87 3353.79
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 383,806.69 DIRECT CANDIDATE SUPPORT					
E. FULL NAME, MAILING ADDRESS & ZIP CODE Century Direct 2355 NW Quincy Portland Ore	PURPOSE/EVENT Leg Fundraise LTA	DATE 11-8-96	TOTAL AMOUNT 6981.00	FEDERAL SHARE 69.81	NON-FEDERAL SHARE 100 6981.00 6911.19
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 390,607.69 DIRECT CANDIDATE SUPPORT					
F. FULL NAME, MAILING ADDRESS & ZIP CODE Strategic Telecomm 2402 University Ave W St. Paul, MN	PURPOSE/EVENT L-602 Telemarketing	DATE 11-6-96	TOTAL AMOUNT 900.85	FEDERAL SHARE 720.68 4335.14	NON-FEDERAL SHARE 85 900.85 18017 21561.06
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 391,568.54 DIRECT CANDIDATE SUPPORT					
SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE			25896.20	3200.49	22696.01
TOTAL THIS PERIOD (last page for each line only)(Fed. share to 21 a 1 and non-Fed. share to 21 a 2)			104997.67	6995.53 9216.18	98202.14 95781.49
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for line 31 of the detailed summary page)					

Revised 4/04/97 Fundraise

NAME OF COMMITTEE

Washington State Republican Party - Federal

A. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
World Class Mail 15520 Woodinville Rd Bed 4 D Ste 200 Road Woodinville Wa	V-96 Rem Fundraise Mail	10-22-96	4656 ¹²		4656 ¹²
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 396229.66 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
B. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
U.S. Postmaster Seattle Wa	V-96-Rem Fundraise postage	10-29-96	6379 ²⁹		6379 ²⁹
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 402603.95 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
C. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Olympus Press Inc 3400 South 150th St Seattle Wa	FD place cards	10-30-96	186 ¹⁰		186 ¹⁰
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 402790.05 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
D. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
E. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
F. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 402,790.05 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE			11221.51		11221.51
TOTAL THIS PERIOD (last page for each line only)(Fed. share to 21 a i and non-Fed. share to 21 a ii) ...			116219 ¹⁸	19216.18	109423.65
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for line 31 of the detailed summary page)					107003.00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Al Symington, Treasurer
Washington State Republican Party
16400 Southcenter Parkway, Suite 200
Seattle, WA 98118

MAY 1 1997

Identification Number: C00031088

Reference: Amended 30 Day Post-General Report (10/16/96-11/25/96) dated 4/14/97

Dear Mr. Symington:

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:

-Your committee has informed the Commission that you excessively transferred \$285,316.22 from your non-federal account to your federal account during the campaign. Please specify how much money was over-transferred during each reporting period for shared allocable expenses during the campaign. Please also provide the total amount owed to your non-federal account on Line 10 of the Summary Page for each reporting period and provide a Schedule D to support that total.

-In your response concerning 100% non-federal activity you state, "The reimbursement shown on revised Schedule H3 is simply the correction of an error. The payments should have been made out of the state account initially." It appears that your Committee may have co-mingled non-federal funds into your federal account for disbursements which are not shared allocable expenses. The Commission recommends that you immediately transfer the total amount received by your federal account back to your non-federal account. If you are unable to make this transfer, it is necessary to show the total as a debt on Line 10 of the Summary Page with a supporting Schedule D.

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. My local number is (202) 219-3580.

Sincerely,

Andrea Wilkens

Andrea Wilkens
Reports Analyst
Reports Analysis Division

266

2001146

TELECON

ANALYST: Andrea Wilkens

CONVERSATION WITH: Jim Coats

COMMITTEE: Washington State Republicans

DATE: 5/21/97

SUBJECT(S):

Mr. Coats, a representative of the Committee, called regarding the RFAI for the Committee's Amended 30G Report dated 4/04/97. Mr. Coats sought an explanation as to why it was incorrect for the Committee to have co-mingled federal and non-federal funds for the fundraisers in question. The RAD analyst explained the process and informed Mr. Coats that the Committee should correct the excessive transfers-in by transferring the funds back to the non-federal account as soon as possible (Attachment). Mr. Coats told the RAD analyst that he understood the rules now and would make sure that the Committee sent in an amended report.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

May 22, 1997

Al Symington, Treasurer
Washington State Republican Party
16400 Southcenter Parkway, Suite 200
Seattle, WA 98118

Identification Number: C0031088

Reference: Amended 30 Day Post-General Report (10/17/96-11/25/96) dated 4/14/97

Dear Mr. Symington:

This letter is to inform you that as of May 21, 1997, the Commission has not received your response to our request for additional information, dated May 1, 1997. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Andrea Wilkens on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson". The signature is fluid and cursive, with a long horizontal stroke at the end.

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



Attachment 10

WASHINGTON STATE REPUBLICAN PARTY

DALE FOREMAN • CHAIRMAN

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

May 23 9 21 AM '97

May 16, 1997

Andrea Wilkins
Reports Analyst
Federal Election Commission
Washington D.C. 20463

RE: Identification Number: C00031088**Reference: Amended 30 Day Post-General Report (10/16/96-11/25/96) dated 4/14/97**

Dear Ms Wilkins:

The Washington State Republican Party received your letter dated May 1, 1997 regarding the above report. At this time we request an extension of 5 days from May 16, 1997.

Thank you for your assistance.

Respectfully,

Roma L. Zubrod
Deputy Treasurer

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

JUN 3 11 06 AM '97

WASHINGTON STATE REPUBLICAN PARTY

DALE FOREMAN • CHAIRMAN

May 23, 1997

Andrea Wilkens, Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington D.C. 20463

Identification Number: C00031088

RE: Amended 30 Day Post-General Report (10/16/96-11/25/96)

Dear Ms. Wilkins:

In response to your request dated May 1, 1997 regarding the above referenced report we submit the following:

We were not over-transferred in any reporting period prior to the 10/16/96-11/25/96 reporting period. During this reporting period we were over-transferred in the amount of \$285,316.22, as previously reported in our amendment dated 4/04/97.

Since you informed us in the second paragraph of your letter dated May 1, 1997 that we cannot reimburse our state account for fundraising expenses inadvertently paid out of the federal account, as explained in our response dated 4/04/97, we are now adding them to the over-transferred total as of 11/25/96. We have added an additional line to Schedule D reflecting \$80,203.89 in fundraising expenses, removed the disbursements from Schedule H4, and reported them on a revised Schedule B. Accordingly, the revised over-transferred amount as of 11/25/96 totals \$365,520.11.

Starting in January 1997 we have begun repaying the loan, and we expect that by the end of June 1997 it will be fully retired.

Thank you for your assistance.

Roma L. Zubrod
Roma L. Zubrod
Deputy Treasurer

Encl.

SCHEDULE D
(Revised 3/80)DEBTS AND OBLIGATIONS
Excluding Loans

5/23/97

11/25/96 Report

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
Washington State Republican Party				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Washington State Republican Party State Capitol Building 16400 Southcenter Parkway #200 Seattle, WA 98188	285,316.22			285,316.22
Nature of Debt (Purpose): Inadvertent Over-transfer of 100% Federal Amounts				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Washington State Republican Party State Capitol Building 16400 Southcenter Pkwy. #200 Seattle, WA 98188	80,203.89			80,203.89
Nature of Debt (Purpose): 100% Non-Federal Activity				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				365,520.11
2) TOTAL This Period (last page this line only)				415,468.12
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				415,468.12

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page	PAGE 1	OF 3
FOR LINE NUMBER		

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

100% Federal

Washington State Republican Party

FEC ID No. C00031088

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Repay Loan	Date (month, day, year)	Amount of Each Disbursement This Period
WSRP State Exempt Account 16400 Southcenter Pkwy, #200 Seattle, WA 98188	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General	1/15/97	46,000.00
	<input checked="" type="checkbox"/> Other (specify)	2/15/97	30,000.00
B. Full Name, Mailing Address and ZIP Code WSRP State Exempt Account 16400 Southcenter Pkwy, #200 Seattle, WA 98188	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General	3/15/97	30,000.00
	<input checked="" type="checkbox"/> Other (specify)	5/15/97	4,000.00
C. Full Name, Mailing Address and ZIP Code WSRP State Exempt Account 16400 Southcenter Pkwy, #200 Seattle, WA 98188	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General	6/15/97	16,000.00
	<input checked="" type="checkbox"/> Other (specify)		
D. Full Name, Mailing Address and ZIP Code	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (optional)

126,000.00

TOTAL This Period (last page this line number only)