



FEDERAL ELECTION COMMISSION

WASHINGTON, D C 20463

Benjamin L. Ginsberg, Esquire  
William J. McGinley, Esquire  
Patton Boggs LLP  
2500 M Street, NW  
Washington, D.C. 20037

DEC 6 2004

RE: MUR 5094  
Republican Party of Florida (nonfederal  
account) and Joel Pate, as treasurer  
Republican Party of Florida Federal  
Campaign Account and Joel Pate, as  
treasurer  
Bill McCollum  
Bill McCollum for US Senate and Richard  
L. Pilhorn, as treasurer  
John Thrasher

Dear Messrs. Ginsberg and McGinley:

On October 22, 2001, your clients, the Republican Party of Florida (nonfederal account) and its treasurer, were notified that the Federal Election Commission found reason to believe they violated 11 CFR § 102.17(c). On December 18, 2001 you submitted a response to the Commission's reason to believe findings. After considering the circumstances of the matter, the Commission determined on November 17, 2004, to take no further action against your clients.

In addition, on September 19, 2000, the Federal Election Commission notified your clients, Republican Party of Florida Federal Campaign Account and its treasurer, Bill McCollum, Bill McCollum for US Senate and Richard L. Pilhorn, as treasurer, and John Thrasher of a complaint alleging violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). On November 17, 2004, the Commission found, on the basis of the information in the complaint, and information provided by respondents, that there is no reason to believe your clients violated the Act in this matter. Accordingly, the Commission closed its file in this matter.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003). A copy of the General Counsel's Report is enclosed for your information

[illegible]

**Enclosure**  
**General Counsel's Report**