



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

Rhode Island Republican State Central Committee and)
Merrill C. Drew, as treasurer)
Lincoln Chafee for U.S. Senate and William R. Facente,)
as treasurer)

MUR 5369

**STATEMENT FOR THE RECORD
VICE CHAIRMAN BRADLEY A. SMITH AND
COMMISSIONERS MICHAEL E. TONER AND DAVID M. MASON**

I. Introduction

This statement provides the basis for the Commission's 4-2 vote¹ to find no reason to believe that the Rhode Island Republican Party ("RIRP") and Merrill C. Drew, as treasurer, violated 2 U.S.C. §§ 441a(a)(2)(A) and 441a(f); no reason to believe that Lincoln Chafee for U.S. Senate and William R. Facente, as treasurer, violated 2 U.S.C. § 441a(f); and no reason to believe that the Rhode Island Republican Party² and Merrill C. Drew, as treasurer, violated 2 U.S.C. § 434(b). Accordingly, the Commission determined to close the file in this matter.

II. Background

On May 23, 2001, the Reports Analysis Division, as part of its regular review of reports filed by political committees during the 2000 election cycle,³ sent the RIRP a routine

¹ Chair Ellen L. Weintraub, Vice Chairman Bradley A. Smith, and Commissioners Michael E. Toner and David M. Mason voted in favor of the motion, and Commissioners Danny L. McDonald and Scott E. Thomas voted against the motion.

² The committee is registered with the Federal Election Commission as the Rhode Island Republican State Central Committee.

³ The activity in question occurred before enactment of the Bipartisan Campaign Reform Act of 2002, Pub. L. No. 107-155, 116 Stat. 81 (2002). The activity was governed by the Federal Election Campaign Act of 1971, as amended ("the Act"), and the regulations in effect at the time. Thus, all references to the Act and Commission regulations exclude changes required by BCRA. With respect to the activity at issue here, those changes are described in the Final Rules for the Bipartisan Campaign Reform Act of 2002; Coordinated and Independent Expenditures, 68 Fed. Reg. 404 (Jan. 3, 2003) (codified at 11 C.F.R. pts. 100, et al.). On May 2, 2003, a three-judge panel of the U.S. District Court for the District of Columbia held that a number of BCRA provisions are unconstitutional but later stayed its order and injunction that had enjoined the enforcement, execution, or other application of the provisions. The case will be argued before the U.S. Supreme Court on September 8, 2003. *McConnell v. FEC*, 251 F. Supp. 2d 176 (D.D.C. 2003), probable jurisdiction noted, 123 S.Ct. 2268 (2003).

23-04-406-1809

request for further information with respect to certain disbursements for media costs.⁴ In response to a follow-up request, RIRP explained that the costs were for uncoordinated expenditures for a federal election. Under established policy, the matter was then referred to the Office of the General Counsel, and, after review, that Office presented its theory to the Commission that the RIRP had engaged in potentially-coordinated non-express advocacy communications because the party and the candidate used the same media strategist and two advertisements contained similar themes and language.

II. Facts and Analysis

The candidate's authorized committee and the RIRP disclosed payments to McAuliffe Message Media/Pilgrim Films (apparently part of the same entity) during the relevant time period.⁵ The two advertisements cited for their similarity were "Tradition" and "Undaunted." "Tradition" was paid for by RIRP:

For Lincoln Chafee, hard work, integrity, and caring for others aren't just political slogans – they're a tradition. Senator Lincoln Chafee puts those values to work every day. For a social security lock box that stops politicians from raiding the trust fund. Ending the marriage tax penalty on working couples. He voted against his own party for a real patients' bill of rights and a prescription drug benefit that gives seniors the drugs they need at a price they can afford. Tell Senator Chafee to keep up his independent fight for Rhode Island.

"Undaunted" was paid for by the Lincoln Chafee for U.S. Senate Committee:

A man of reason and moderation, independent minded and forward looking, Senator Lincoln Chafee's character and leadership is working for Rhode Island. A sense of duty and exemplary executive experience, Chafee knows how to get things done. Undaunted in his efforts – protecting our environment, pushing for a patients' bill of rights, Medicare prescription drug coverage for all beneficiaries. A man of conviction, a leader. Senator Lincoln Chafee – a tradition of trust.

The Act provides that state political party committees may make coordinated expenditures, within certain limits. 2 U.S.C. § 441a(d). In addition, state party committees may make independent expenditures on behalf of federal candidates without limit. *Colorado Republican Federal Campaign Committee v. FEC*, 518 U.S. 604 (1996). The Commission's view of the relevant standards governing the subject advertisements has been amply described

⁴ Attached are portions of the RIRP disclosure report in which the disbursements at issue appear, Attachment 1, and the RIRP's response to the Reports Analysis Division's inquiry, Attachment 2.

⁵ See Lincoln Chafee for U.S. Senate, 2000 October Quarterly Report dated Oct. 12, 2000, Sched. B for Line 17 at 8-9; RIRP, 2000 October Quarterly Report dated Oct. 5, 2000, Sched. B. for Line 21b at 1-2.

0181-904-40-22

in numerous statements.⁶ It is precisely because of the notice, fairness and consistency concerns identified in these statements and the cumulative history of the Commission's treatment of similarly-situated respondents that the Commission voted to find no reason to believe that violations had occurred and to close the file in this matter.

As a result of the disposition of cases arising during past election cycles, parties and candidates operated under a de facto Commission policy of not treating non-express advocacy communications by political parties as coordinated expenditures.⁷ In 1999, addressing matters from the 1996 election cycle, the Commission rejected by a 2-4 vote recommendations by its audit staff to treat non-express advocacy advertisements by national political parties featuring the party's presidential nominee (or opponent) as coordinated expenditures on behalf of the nominee despite substantial evidence of extensive cooperation between the party and the nominee in crafting and disseminating the communications.⁸ The four Commissioners who voted to reject the recommendation explained that they did so because the "electioneering message" test relied upon in the audits and accompanying legal analyses was impermissibly vague, overbroad and had not been properly promulgated by the Commission, thus leaving parties without notice as to what sort of communications (other than express advocacy) might be treated as coordinated contributions if made in cooperation with a campaign.

Subsequently, by a 3-3 vote with a substantially different alignment of Commissioners, the Commission refused to initiate enforcement proceedings with respect to these rejected audit findings. Those Commissioners declining to go forward again cited vagueness, overbreadth and, by that point, inconsistency with the Commission's own actions

⁶ Statement of Reasons in MURs 4568, et al. (Triad) of Commissioner Mason (Jan. 22, 2003); Statement of Reasons in MUR 4538 (Alabama Republican Party et al.) of Commissioners Mason and Smith (May 23, 2002); Supplemental Statement of Reasons in MUR 4994 (Clinton for Senate et al.) of Commissioner Smith (Jan. 17, 2002); Statement of Reasons in MUR 4994 (Hillary Rodham Clinton for U.S. Senate, et al.) of Commissioner Thomas (Dec. 19, 2001); Statement for the Record in MUR 4624 (The Coalition) of Commissioner Smith (Nov. 6, 2001); Statement of Reasons in MUR 4624 of Commissioners Thomas and McDonald (Sept. 7, 2001); Supplemental Statement of Reasons in MUR 4553, et al. (Dole/Clinton) of Commissioner Thomas (June 28, 2000); Statement of Reasons in MUR 4553, et al. (Dole/Clinton) of Commissioner Thomas (May 25, 2000); Statement of Reasons in MUR 4378 (Rehberg) of Commissioners Wold, Elliott, and Mason (Oct. 28, 1999); Statement of Reasons in MUR 4378 (Rehberg) of Commissioners Thomas and McDonald (Aug. 10, 1999); Statement of Reasons in the Audits of Dole for President, Inc. (Primary), et al. of Commissioners Wold, Elliott, Mason, and Sandstrom (June 24, 1999).

⁷ See Statement of Reasons in MUR 4994 (Hillary Rodham Clinton for U.S. Senate, et al.) of Commissioner Thomas (Dec. 19, 2001) ("at the time the activity in question was occurring, the parties and candidates could not have had a clear picture of whether their plans would be treated as a violation of the coordinated expenditure limits").

⁸ Statement of Reasons of Commissioners Wold, Elliott, Mason, and Sandstrom in the Audits of "Dole for President Committee, Inc. (Primary), et al. of Commissioners Wold, Elliott, Mason and Sandstrom (June 24, 1999).

⁹ This test is different from the electioneering communications definition subsequently adopted by Congress in BCRA.

181-904-40-22

in the audit.¹⁰ Still later, in matters arising from the 1996 and 1998 election cycles, the Commission rejected a series of probable cause recommendations from its General Counsel alleging that various state political parties had made excessive coordinated contributions to the Senate nominees when the parties made non-express advocacy communications in cooperation with the nominees. In one case from the 1998 election cycle, the Commission found that a party had made excessive coordinated communications on behalf of a nominee but restricted these findings to the party's express advocacy communications.¹¹

On August 2, 1999 the U.S. District Court for the District of Columbia found that the Commission's coordination regulation was unconstitutional.¹² Rather than seek review of the ruling the Commission repealed the subject rule and promulgated a new coordination regulation.¹³ When it enacted BCRA, Congress repealed the post-*Christian Coalition* regulation and directed the Commission to promulgate yet another coordination regulation.¹⁴ This series of events only further muddled the waters as to what sorts of communications by political parties might constitute coordinated expenditures.

By the 2000 election cycle, the Commission was rejecting even investigating allegations involving alleged coordination of non-express advocacy party communications. While Commissioners diverged in some degree on their rationales, all agreed that "at the time the activity in question was occurring, the parties and candidates could not have had a clear picture of whether their plans would be treated as a violation of the coordinated expenditure limits."¹⁵ Having rejected a complaint involving party advertising in the 2000 election on this basis in December of 2001, it would have been wholly arbitrary and capricious for the Commission in June of 2003 to change course and proceed under a theory of law which it had consistently rejected over the four previous years.

As previously explained, "[t]he Commission's uncertain policy guidance and the absence of consistent enforcement policy have, separately or together, made it impossible for the Commission to cite political parties for coordinating non-express advocacy

¹⁰ MURs 4969, 4970, and 4713.

¹¹ MUR 4503 (South Dakota Democratic Party).

¹² *FEC v. Christian Coalition*, 52 F. Supp.2d 45, 89 (D.D.C. 1999)(referring to prior version of 11 C.F.R. § 109.1(b)(4)).

¹³ 65 Fed. Reg. 76138 (Dec. 6, 2000) (codified later at 11 C.F.R. § 100.23).

¹⁴ Section 214(c) of BCRA provides, "The Federal Election Commission shall promulgate new regulations on coordinated communications paid for by persons other than candidates, authorized committees of candidates, and party committees. The regulations shall not require agreement or formal collaboration to establish coordination..." The Commission promulgated the new regulations in Final Rules for the Bipartisan Campaign Reform Act of 2002; Coordinated and Independent Expenditures, 68 Fed. Reg. 404 (Jan. 3, 2003) (codified at 11 C.F.R. pts. 100, et al.).

¹⁵ Statement of Reasons in MUR 4994 (Hillary Rodham Clinton for U.S. Senate, et al.) of Commissioner Thomas (Dec. 19, 2001).

communications with candidates."¹⁶ If parties and candidates were not on notice of the Commission's interpretation of the relevant statutes and regulations, as a matter of "hornbook law in the administrative context"¹⁷ the Commission has no basis to pursue Respondents in this matter.¹⁸ The regulated community thus had no fair warning of Commission enforcement policy in such matters and traditional concepts of due process preclude the imposition of penalties.¹⁹

There is now an additional reason for the Commission to decline to dedicate resources for the pre-November 2002 coordinated expenditure allegations at issue here. As explained above, both the "content" (whether the relevant category of communications is restricted to or extends beyond express advocacy and how far beyond) and the "conduct" (*Christian Coalition*, BCRA) legs of the Commission's coordinated communications concept have been subject to disagreement and shifting interpretation. In BCRA, Congress specifically included certain non-express advocacy communications in the class of potentially-coordinated communications, and the Commission added additional content standards pursuant to a specific regulatory mandate from Congress.²⁰ Whatever the law should have been prior to November 2002, it has substantially changed now, and there would be no value whatsoever in pursuing a test case (or making a declaration through a reason-to-believe finding without further proceedings) as to whether particular communications may have violated the vague standards in effect prior to BCRA.

Furthermore, the information available to the Commission is not suggestive of coordination and therefore fails the reason-to-believe threshold. The text of "Tradition" and "Undaunted" contain immaterial similarities reasonably attributed to the common sense conclusion that most parties and candidates will be addressing a defined set of campaign issues in their advertising. The Commission has no legal basis to assign a legal consequence to these similarities without specific evidence of prior coordination with regard to the specific content, timing and placement of the advertisements. Although both committees itemized disbursements to the same media firm, this fact speaks weakly to the burden of proof the

¹⁶ Statement of Reasons in MUR 4538 (Alabama Republican Party) of Commissioners Mason and Smith (May 23, 2002) at 7.

¹⁷ *General Elec. Co. v. EPA*, 53 F.3d 1324, 1329 (D.D.C. 1995)(citing *Rollins Environmental Services (NJ) Inc., v. U.S.*, 937 F.2d 649, 655 n.1 (D.C. Cir. 1991)(Edwards, J., dissenting in part and concurring in part)).

¹⁸ Commissioner Smith has argued that prior to BCRA "coordinated spending by party committees does not become subject to the Act's limits on contributions unless it contains express advocacy." Supplemental Statement of Reasons in MUR 4994 (Hillary Rodham Clinton for U.S. Senate, et al.) of Commissioner Smith (Jan. 17, 2002) at 9. Commissioner Toner concurs with Commissioner Smith's conclusion of law on this issue. Because the RIRP's "Tradition" advertisement lacks express advocacy, for this additional reason Commissioners Smith and Toner voted to find no reason to believe.

¹⁹ *Satellite Broadcasting Co., Inc. v. FCC*, 824 F.2d 1, 3 (D.C. Cir. 1987)("Traditional concepts of due process incorporated into administrative law preclude an agency from penalizing a private party for violating a rule without first providing adequate notice of the substance of the rule."); U.S. Const. amend. V.

²⁰ 2 U.S.C. § 441a(a)(7)(C); 11 C.F.R. § 109.21(c).

2018-04-10-22

Commission has when it seeks to prove coordination. Given the history of the Commission's disposition of previous matters and this generalized and unfocused factual support, the Commission voted to find no reason to believe that violations occurred and closed the file in this matter.

August 15, 2003



Bradley A. Smith
Vice Chairman



David M. Mason
Commissioner



Michael E. Toner
Commissioner

4181-904-40-22

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEC MAIL ROOM

1999 OCT 16 P 2:41

1. NAME OF COMMITTEE (in full)
RI Republican State Central Comm.

ADDRESS (number and street) ☐ Check if different than previously reported
551 South Main Street

CITY, STATE and ZIP CODE
Providence, RI 02903

2. FED IDENTIFICATION NUMBER
C-00078196

3. ☐ This committee has qualified as a union candidate committee. (See FEC FORM 10)

4. TYPE OF REPORT

- ☐ 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

☐ 12-Day Pre-Election Report for the _____
(Type of Election)
election on _____ in the State of _____

☐ 30-Day Post-Election Report following the General Election
on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

| SUMMARY | | COLUMN A Title Period | COLUMN B Calendar Year-to-Date |
|-----------------------------------------------------------------------------------------------|--|--------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5. Covering Period 7-1-00 through 9-30-00 | | | |
| 6. (a) Cash on Hand January 1, 19 00 | | | \$ 5161.58 |
| (b) Cash on Hand at Beginning of Reporting Period | | \$ 18,914.81 | |
| (c) Total Receipts (from Line 18) | | \$ 212,320.85 | \$ 219,400.25 |
| (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | | \$ 231,235.66 | \$ 304,568.77 |
| 7. Total Disbursements (from Line 20) | | \$ 182,328.00 | \$ 255,654.13 |
| 8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | | \$ 48,907.66 | \$ 48,907.66 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | | \$ | For further information contact: Federal Election Commission 800 E Street, NW Washington, DC 20543 Toll Free 800-424-9530 Local 202-694-1100 |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | | \$ 32,125.94 | |

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
Margaret C. Cockburn

Signature of Treasurer
Margaret C. Cockburn

Date
10-5-00

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

FEC FORM 3X

(revised 8/99)

ATTACHMENT

MODULE B

ITEMIZED DISBURSEMENTS

Use separate schedule (up-
per each category of the
Detailed Summary Page

PAGE 1 OF 3
FOR LINE NUMBER
216

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)

RI Republican State Central Committee

| | | | |
|-----------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|--------------------------------------------------------------------------|
| <p>A. Full Name, Mailing Address and ZIP Code Philadelphia Marriott Marple street Philadelphia, PA</p> | <p>Purpose of Disbursement Convention hotel Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year) 7/1/00</p> | <p>Amount of Each Disbursement This Period 706.56</p> |
| <p>B. Full Name, Mailing Address and ZIP Code Town of Smithfield 64 Fairview Pike Smithfield, RI 02877</p> | <p>Purpose of Disbursement voter files Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year) 7/1/00</p> | <p>Amount of Each Disbursement This Period 25.00</p> |
| <p>C. Full Name, Mailing Address and ZIP Code US Airways Airport Road Warrick, RI 02885</p> | <p>Purpose of Disbursement CONVENTION airfare Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year) 7/1/00</p> | <p>Amount of Each Disbursement This Period 397.50</p> |
| <p>D. Full Name, Mailing Address and ZIP Code AT + T PO Box 371430 Mellon, RI 02850</p> | <p>Purpose of Disbursement Telephone Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year) 8/25/00</p> | <p>Amount of Each Disbursement This Period 1042.53</p> |
| <p>E. Full Name, Mailing Address and ZIP Code M. Ruliffe Media</p> | <p>Purpose of Disbursement Production / Ad time Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year) 5/21/00 2/15/00</p> | <p>Amount of Each Disbursement This Period 85,000 21,810</p> |
| <p>F. Full Name, Mailing Address and ZIP Code Providence Marriott One Orms street Providence, RI 02906</p> | <p>Purpose of Disbursement catering costs Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year) 6/15/00</p> | <p>Amount of Each Disbursement This Period 591.24</p> |
| <p>G. Full Name, Mailing Address and ZIP Code STATE OF Rhode Island 100 S. Main street Providence, RI 02903</p> | <p>Purpose of Disbursement Vote file Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year) 8/10/00</p> | <p>Amount of Each Disbursement This Period 25.00</p> |
| <p>H. Full Name, Mailing Address and ZIP Code Town of Hopkinton Town Hall Hopkinton, RI 02877</p> | <p>Purpose of Disbursement Voter Files Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year) 8/21/00</p> | <p>Amount of Each Disbursement This Period 15.00</p> |
| <p>I. Full Name, Mailing Address and ZIP Code Town of Jamestown Town Hall Jamestown, RI 02835</p> | <p>Purpose of Disbursement Voter Files Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year) 8/17/00 8/15/00</p> | <p>Amount of Each Disbursement This Period 25.00 2.50</p> |

TOTAL of Disbursements This Page (optional)

109,000.73

L This Period (last page this line number only)

ATTACHMENT

Page 2 of 3

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 2 OF 3
FOR LINE NUMBER 81

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)

RI Republican State Central Committee

| | | | |
|--------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|----------------------------------------------------------------------------------|
| <p>A. Full Name, Mailing Address and ZIP Code</p> <p>Town of Portsmouth Town Hall Portsmouth, RI 02871</p> | <p>Purpose of Disbursement</p> <p>Voter Files</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year)</p> <p>9/7/00</p> | <p>Amount of Each Disbursement This Period</p> <p>4.15</p> |
| <p>B. Full Name, Mailing Address and ZIP Code</p> <p>Federal Express 551 N. Main St Providence, RI 02902</p> | <p>Purpose of Disbursement</p> <p>Printer Purchase mailing costs</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year)</p> <p>9/12/00</p> | <p>Amount of Each Disbursement This Period</p> <p>112.32</p> |
| <p>C. Full Name, Mailing Address and ZIP Code</p> <p>Federal Express 100 Westminster St Providence, RI 02903</p> | <p>Purpose of Disbursement</p> <p>mailing costs</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year)</p> <p>9/12/00 9/13/00 9/14/00</p> | <p>Amount of Each Disbursement This Period</p> <p>12.32 13.52 158.50</p> |
| <p>D. Full Name, Mailing Address and ZIP Code</p> <p>Town of Scituate 195 Danielson Pike Scituate, RI 02857</p> | <p>Purpose of Disbursement</p> <p>Voter File</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year)</p> <p>9/12/00</p> | <p>Amount of Each Disbursement This Period</p> <p>30.00</p> |
| <p>E. Full Name, Mailing Address and ZIP Code</p> <p>WBLW Reef Estate 126 High Street Boston, MA 02110</p> | <p>Purpose of Disbursement</p> <p>Rent</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year)</p> <p>9/7/00</p> | <p>Amount of Each Disbursement This Period</p> <p>1000.00</p> |
| <p>F. Full Name, Mailing Address and ZIP Code</p> <p>Pilgrim Films</p> | <p>Purpose of Disbursement</p> <p>Production Costs</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year)</p> <p>9/10/00</p> | <p>Amount of Each Disbursement This Period</p> <p>8572.00</p> |
| <p>G. Full Name, Mailing Address and ZIP Code</p> <p>Bell Atlantic PO Box 968 Providence, RI 02901</p> | <p>Purpose of Disbursement</p> <p>Telephone</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year)</p> <p>9/7/00</p> | <p>Amount of Each Disbursement This Period</p> <p>248.61</p> |
| <p>H. Full Name, Mailing Address and ZIP Code</p> <p>Pleer Bank 100 Westminster Street Providence, RI 02903</p> | <p>Purpose of Disbursement</p> <p>Bank Charges</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year)</p> <p>7/31/00 9/11/00</p> | <p>Amount of Each Disbursement This Period</p> <p>6.50 55.50</p> |
| <p>I. Full Name, Mailing Address and ZIP Code</p> <p>Pleer Bank 100 Westminster Street Providence, RI 02903</p> | <p>Purpose of Disbursement</p> <p>Bank Charges</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p> | <p>Date (month, day, year)</p> <p>8/1/00 9/29/00</p> | <p>Amount of Each Disbursement This Period</p> <p>25.90 12.95</p> |

TOTAL of Disbursements This Page (optional)

10,259.25

L This Period (last page this line number only)

ATTACHMENT

PER 3 OF 3

Rhode Island Republican Party

331 SOUTH MAIN STREET
PROVIDENCE, R.I. 02903

PHONE: (401) 453-4100 • FAX: (401) 453-0066

RECEIVED
FEC MAIL ROOM

2001 JUL -6 A 10: 32

July 2, 2001

Federal Election Commission
Reports Analysis Division
c/o Colleen Manning
999 E Street, N.W.
Washington, DC 20463

Dear Colleen:

This letter serves as the Rhode Island Republican State Central Committee's (C00078196) response to the Commission's inquiry regarding the October Quarterly Report (7/1/00-9/30/00).

1. On Schedule B, the questioned expenditures made for "Production/Ad Time and Production Costs" should have read:

Page 1 of 3, Line E

McAuliffe Message Media
336 Commerce Street
Alexandria, VA 22314

Purpose of Disbursement: Uncoordinated Expenditure for Federal
Level Election

Candidate: U.S. Senator Lincoln Chafee
P.O. Box 7629
Warwick, RI 02889

1 of 3

ATTACHMENT 2
Page 1 of 3

RECEIVED
FEC MAIL ROOM

200 JUL -b A 10: 32

Page 2 of 3, Line F

Pilgrim Films
Black Horse Lane
Cohasset, MA 02025

Purpose of Disbursement: Uncoordinated Expenditure for Federal
Level Election

Candidate: U.S. Senator Lincoln Chafee
P.O. Box 7629
Warwick, RI 02889

2. On Schedule H (4), the itemized disbursement in question should have read:

Page 6 of 7, Line B

Bernard A. Jackvony
100 Pegwin Drive
East Greenwich, RI 02818

Purpose of Disbursement: Expenses-Reimbursement for Travel to RNC
Meeting

3. On Schedule H (4) supporting Line 21(a)(i), the correct addresses are as follows:

Page 5 of 7, Line B

Tim Bonin
42 Sandy Glen Drive
Holden, MA 01520

Page 5 of 7, Line D

Psychex, Inc.
501 Wampanoag Trail
East Providence, RI 02914

Page 5 of 7, Line E

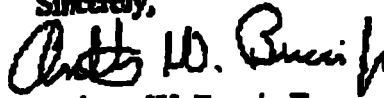
Psychex, Inc.
501 Wampanoag Trail
East Providence, RI 02914

Page 5 of 7, Line F

Paychex, Inc.
501 Wampanoag Trail
East Providence, RI 02914

If you require any further information, please do not hesitate to contact me. Thank
you.

Sincerely,



Anthony W. Buccì Jr.
Treasurer