
**REPORT OF THE AUDIT DIVISION
ON
Republican Leadership Fund**

Approved August 12, 1994



**FEDERAL ELECTION COMMISSION
999 E STREET, N.W.
WASHINGTON, D.C.**

95970193013

95970125034

**REPORT OF THE AUDIT DIVISION
ON**

Republican Leadership Fund

Approved August 12, 1994



**FEDERAL ELECTION COMMISSION
999 E STREET, N.W.
WASHINGTON, D.C.**

TABLE OF CONTENTS
REPUBLICAN LEADERSHIP FUND

	Page
Executive Summary	1
Final Audit Report	3
Background	3
Findings	5
Legal Analysis	13
Transmittal to Committee	17
Chronology	19

95070123000



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

FINAL AUDIT REPORT
ON THE
REPUBLICAN LEADERSHIP FUND

EXECUTIVE SUMMARY

The Republican Leadership Fund (the Committee) registered with the Federal Election Commission on May 4, 1992 as the fundraising representative for certain joint fundraising activities engaged in by the Bush-Quayle '92 Primary Committee (Bush-Quayle '92), the Ohio Republican Party Federal Account (ORP-Federal), and the Ohio Republican Party State Account (ORP-State). Bush-Quayle '92 received federal matching funds.

The audit was conducted pursuant to the public funding statute at 26 U.S.C. §9038(a).

The findings of the audit were presented to the Committee at an exit conference at the conclusion of audit fieldwork (June 17, 1993) and in the interim audit report approved by the Commission on December 7, 1993. The Committee's responses to the findings contained in the interim report are included in this report.

The final audit report requires the Committee to pay \$28,901 to the U.S. Treasury; a balance of \$26,575 remains unpaid.

The findings contained in the final audit report are summarized below.

Allocation of Expenses and Distribution of Net Proceeds - 11 CFR §§9034.8(c)(1), (5), (7) and (8). Participants in a joint fundraising activity are required to enter into a written agreement which identifies a joint fundraising representative and states a formula for allocating fundraising proceeds. Using this formula, the fundraising representative must allocate proceeds and expenses on a per event basis, and in turn, distribute the net proceeds to the participants. The Committee, however, did not follow these requirements and, as a result, made excessive distributions of \$7,045 to Bush-Quayle '92, \$22,148 to ORP-Federal, and \$12,911 to ORP-State. (Some of these funds represented excessive or earmarked contributions which had to be repaid or reimbursed; see below.) The interim report recommended that the Committee obtain reimbursements from

950 / 0193016

the participants and amend its disclosure reports to reflect the correct allocations. Reimbursements were received from Bush-Quayle '92, but not from the other participants.

Excessive Contributions - 2 U.S.C. §441a. The Committee accepted \$28,901 in excessive contributions designated for Bush-Quayle '92. Under an FEC policy on unresolved excessive contributions, the Committee was required to pay that amount to the U.S. Treasury. (To date, \$26,575 remains unpaid.) Although the Committee claimed that some of the contributions actually represented lawful joint contributions from spouses (husband and wife each contributing up to the \$1,000 limit), the Committee failed to support the claim by providing signatures or written authorizations from joint contributors.

Earmarked Contributions - 11 CFR §9034.8(c)(7)(iv). The Committee received \$8,675 in contributions made out to committees not participating in the joint fundraiser. The interim report recommended that the Committee refund these contributions, but the Committee neither made the refunds nor provided documentation showing that the contributions were intended for the fundraiser, as claimed.

957/0193097



REPORT OF THE AUDIT DIVISION
ON THE
REPUBLICAN LEADERSHIP FUND

I. Background

A. Audit Authority

250701938

This report is based on an audit of the Republican Leadership Fund (the Committee). The audit is mandated by Section 9038(a) of Title 26 of the United States Code. That section states that "After each matching payment period, the Commission shall conduct a thorough examination and audit of the qualified campaign expenses of every candidate and his authorized committees who received payments under section 9037." Also Section 9039(b) of the United States Code and Section 9038.1(a)(2) of the Commission's Regulations state that the Commission may conduct other examinations and audits from time to time as it deems necessary.

The audit seeks to determine if the campaign has materially complied with the limitations, prohibitions and disclosure requirements of the Federal Election Campaign Act of 1971, as amended.

B. Audit Coverage

The audit covered the period from the inception of bank activity, April 24, 1992, through December 31, 1992. During this period, the Committee reports reflect an opening cash balance of \$-0-, total receipts of \$779,575, total disbursements of \$779,461, and a closing cash balance of \$114.1/

C. Campaign Organization

The Committee registered with the Federal Election Commission on May 4, 1992 and is a separate committee established to act as a fundraising representative for all participants engaged in certain joint fundraising activities. The participants in the fundraising activity were the Bush-Quayle '92 Primary Committee, Inc. (Bush-Quayle '92), the Ohio Republican Party

1/ All amounts are rounded to the nearest dollar.

Federal Account (ORP-Federal), and the Ohio Republican Party State Account (ORP-State). The Treasurer of the Committee is Keith A. Davis. The Committee's office is located in Columbus, Ohio.

To manage its financial activity, the Committee maintained two bank accounts. From these accounts the Committee made approximately 100 disbursements. Approximately 500 contributions were received from 500 persons. These contributions totaled approximately \$780,000.

D. Audit Scope and Procedures

The audit covered the following general categories:

1. The Committee's compliance with statutory limitations with respect to the receipt of contributions or loans (see Finding II.A.);
2. the Committee's compliance with the statutory requirements regarding the receipt of contributions from prohibited sources, such as those from corporations or labor organizations;
3. proper disclosure of contributions from individuals, ~~political committees and other entities, to include the~~ itemization of contributions when required, as well as, the completeness and accuracy of the information disclosed;
4. proper disclosure of disbursements including the itemization of disbursements when required, as well as, the completeness and accuracy of the information disclosed;
5. proper disclosure of debts and obligations;
6. the accuracy of total reported receipts, disbursements and cash balances;
7. adequate recordkeeping for transactions; and
8. other audit procedures that were deemed necessary in the situation.

Unless specifically discussed below, no material non-compliance was detected. It should be noted that the Commission may pursue further any of the matters discussed in this report in an enforcement action.

050/0193039

II. Findings and Recommendations

A. Allocation of Expenses and Distribution of Net Proceeds

Section 9034.8(c)(1) of Title 11 of the Code of Federal Regulations states, in part, that the participants in a joint fundraising activity shall enter into a written agreement. The written agreement shall identify the fundraising representative and shall state a formula for the allocation of fundraising proceeds.

Section 9034.8(c)(7)(i) of Title 11 of the Code of Federal Regulations states, in part, that the fundraising representative shall allocate proceeds according to the formula stated in the fundraising agreement. Each contribution received shall be allocated among the participants in accordance with the allocation formula, unless the circumstances described in paragraphs (c)(7)(ii), (iii), or (iv) of this section apply.

Section 9034.8(c)(7)(iv) of Title 11 of the Code of Federal Regulations states that earmarked contributions which exceed the contributor's limit to the designated participant under 11 CFR part 110 may not be reallocated by the fundraising representative without the prior written permission of the contributor. A written instrument made payable to one of the participants shall be considered an earmarked contribution unless a written statement by the contributor indicates that it is intended for inclusion in the general proceeds of the fundraising activity.

Section 9034.8(c)(5)(i) of Title 11 of the Code of Federal Regulations states, in relevant part, that the fundraising representative and participating committees shall screen all contributions received to insure that the prohibitions and limitations of 11 CFR parts 110 and 114 are observed.

Section 110.1(b)(1) of Title 11 of the Code of Federal Regulations states that no person shall make contributions to any candidate, his or her authorized political committees or agents with respect to any election for Federal office which, in the aggregate exceed \$1,000.

Section 9034.8(c)(8)(i)(A) of Title 11 of the Code of Federal Regulations states: "After gross contributions are allocated among the participants under 11 CFR 9034.8(c)(7), the fundraising representative shall calculate each participant's share of expenses based on the percentage of the total receipts each participant had been allocated. To calculate each participant's net proceeds, the fundraising representative shall subtract the participant's share of expenses from the amount that participant has been allocated from gross proceeds." Paragraph (c)(8)(i)(C) of this section states: "The expenses from a series

95070197000

of fundraising events or activities shall be allocated among the participants on a per-event basis regardless of whether the participants change or remain the same throughout the series."

1. Background

The Committee conducted two fundraising events: one in Columbus, Ohio on April 30, 1992; the other in Cleveland, Ohio on May 21, 1992. According to the joint fundraising agreement the formula for allocating contributions to the participants was:

(a) for all contributions from individuals:

\$.01 - \$1,000	Bush-Quayle '92
\$1,000.01 - \$6,000	ORP-Federal
\$6,000.01 - over	ORP-State

(b) for all contributions from political action committees:

\$.01 - \$5,000	ORP-Federal
\$5,000.01 - over	ORP-State

2. Excessive Contributions

The Commission notified Bush-Quayle '92 by letter dated June 2, 1992, that the Commission would no longer recognize any untimely resolution of excessive contributions received by the Committee. That letter states, in part, "Commission regulations provide committees with 30 days in which to refund contributions which appear to be prohibited, and 60 days in which to seek the reattribution, redesignation or refund of excessive contributions. 11 C.F.R. §§103.3(b)(1), (2) and (3). Contributions resolved by committees outside these time periods are considered untimely and in violation of the Commission's regulations. The Commission will no longer recognize any untimely refunds, redesignations or reattributions made more than 60 days following a candidate's date of ineligibility or after the date of receipt of this letter, whichever is later. After this deadline, the Commission will request that all unresolved prohibited or excessive contributions be paid to the United States Treasury."

The Committee received contributions in excess of the contribution limitation to Bush-Quayle '92 in the amount of \$28,901. The excessive contributions resulted when contributions made payable to Bush-Quayle '92 exceeded the \$1,000 limitation or aggregated in excess of the \$1,000 limitation. In some cases, the Committee reattributed a portion of a contribution to another individual without having the individual's signature or written authorization. In other cases, the Committee allocated a portion of an earmarked contribution to ORP-Federal instead of Bush-Quayle

95070193001

'92. However, since the checks were payable to Bush-Quayle '92, the contributions could not be allocated to other participants without the contributor's written consent.

The excessive portions of the contributions were not timely resolved pursuant to 11 C.F.R. §103.3(b)(3) and as of the conclusion of audit fieldwork had not been refunded.

At the exit conference, the Committee was provided with a schedule of the excessive contributions.

3. Earmarked Contributions

The Committee received contributions totaling \$5,000 which were drawn on checks on which the payee or designee was the Bush-Quayle '92 Compliance Fund and \$2,000 in contributions drawn on checks payable to Cuyahoga County Republican Party. Neither of these committees was a participant in the joint fundraising agreement. In addition, the Committee received contributions totaling \$1,675 which were drawn on checks payable to the Ohio Republican Party.

Documentation with respect to these contributions indicates that they were not intended to be contributions to the joint fundraising committee. Four of the six contribution checks were dated several weeks after the last event, a fifth check was dated approximately two months prior to the first event, and the remaining contribution was specifically designated to the Ohio Republican Party by the contributor. In addition, the contributors included Ohio Republican Party pledge cards or provided correspondence that directed the contribution to the Ohio Republican Party, not the Republican Leadership Fund.

The Committee did not forward any of the contributions noted above to the named payee, but instead these contributions were allocated among the participants of the joint fundraiser. Based on the earmarked nature of these contributions, it is the opinion of the Audit staff that the Committee was precluded from accepting them.

At the exit conference, the Committee was provided with a schedule of the contributions made payable to Bush-Quayle '92 Compliance Fund and Cuyahoga County Republican Party.

4. Distribution of Net Proceeds

The Committee provided the Audit staff with a schedule of its distribution of net proceeds and expenses among the participants. The Committee's percentages for determining each participant's share of expenses were developed using the combined gross proceeds from the two events rather than on a per event basis.

The Audit staff allocated gross receipts and expenses to the applicable events. These amounts were adjusted

250 / 0193992

for excessive contributions noted in Section 2 above and contributions earmarked for non-participating committees noted in Section 3 above. In addition, the Audit staff corrected the allocation of certain contributions among the participants to conform to the allocation provided for in the joint fundraising agreement. Finally, the Audit staff calculated percentages for determining each participant's share of expenses and distribution of net proceeds for each event.

Based on the adjustments noted above, the Audit staff concludes that the Committee made excessive distributions to Bush-Quayle '92 in the amount of \$7,045, ORP-Federal in the amount of \$22,148 and the ORP-State in the amount of \$12,911.^{2/} On December 23, 1992, the Committee received a refund from Bush-Quayle '92 in the amount of \$4,719 representing contributions received from the Committee that were in excess of the limitation to Bush-Quayle '92.

At the exit conference, the Committee was provided with a schedule which detailed the Audit staff's calculations.

The Committee was requested to obtain a reimbursement of \$2,326 (\$7,045 - \$4,719) from Bush-Quayle '92, \$22,148 from ORP-Federal and \$12,911 from ORP-State and amend its disclosure reports to disclose the proper allocations. The Committee was requested to inform the participating committees of the need to file amended reports reflecting the correct allocations.

In addition, the interim report recommended that the Committee present evidence that the \$28,901 in contributions noted in Section 2 above are not excessive or make a payment to the United States Treasury in the amount of \$28,901.

With respect to the \$8,675 in contributions noted in Section 3 above, the interim report recommended that the Committee issue refunds to the contributors and provide evidence of such refunds (copies of the front and back of the negotiated refund checks).

In a letter requesting an extension of time in which to reply to the interim report, the Committee Treasurer stated that:

"One of the participating committees, the Bush-Quayle '92 Primary Committee, Inc. does not dispute the audit report findings, and has already refunded to the Republican Leadership Fund the amount referenced in Attachment 3 of the Report...

^{2/} These amounts are adjusted slightly from the figures cited in the interim audit report forwarded to the Committee. The Committee has been advised of the adjustments.

05070193033

[T]he other participating committee, the Ohio Republican Party-Federal Account, has indicated... that they need additional time to complete their review of the findings and the pertinent contributor information and disbursement files."^{3/}

Subsequently, a letter was received from the General Counsel of the Ohio Republican Party. The letter, in an apparent attempt to show that the Committee complied with the regulations cited in the interim report, explained in detail, the fundraising procedures employed by the Committee.

A follow-up response by the Committee Treasurer acknowledged the letter by Counsel for the Ohio Republican Party and stated that "... the Republican Leadership Fund has no additional information to provide to the Commission, and therefore makes no additional response to the Interim Audit Report."

With respect to the letter from Counsel for the Ohio Republican Party, the Audit staff notes the following:

Regarding the excessive contributions, Counsel ~~stated that the joint fundraising agreement provided that "...revenues would be 'rolled' from one participant to another as the respective financial contribution limits were fulfilled."~~ In lieu of repeating the method by which funds were "rolled" from one account to another, a copy of the joint fundraising agreement was enclosed.

In addition, Counsel stated that contributions from husband and wife "...were frequently combined in one check, although each spouse was in fact making \$1,000 contributions..." and "...the interim report has apparently taken the position that the entire contribution is to be attributed to the first name which appears on the check, typically the husband."

Counsel has apparently overlooked the regulation at 11 C.F.R. §110.1(k), which requires any contribution made by more than one person to include the signature of each contributor, on the check or in a separate writing; and at 11 C.F.R. §9034.8(c)(7) which states that earmarked contributions which exceed the contributor's limit to the designated participant may not be reallocated by the fundraising representative without the prior written permission of the contributor. Counsel's response included neither the signatures of the contributors at issue, nor the contributors' written permission to allocate the

^{3/} Evidence that a reimbursement was received from Bush-Quayle '92 was not provided. See footnote ^{4/} at page 9.

050/0193094

contributions, which were earmarked for Bush-Quayle '92, to other participants.

Regarding the earmarked contributions, Counsel stated initially that "The interim report does not disclose the identity of the contributors who were alleged to have made contributions other than 'intended to be contributions to the joint fundraising committee.'" However later in the letter, Counsel stated:

"The contributions set forth on Attachment 2 [Earmarked Contributions] apparently are questioned by the Commission because the payee differs in some respect from either the fundraising representative or one of the three participants to the joint fundraising activity. Notwithstanding these insignificant variations, all of the contributions set forth on Attachment 2 were intended by their respective contributor for receipt by the joint fundraising event."

Since Counsel has not provided evidence from the contributors documenting that their contributions were intended for the joint fundraiser, Counsel's arguments are not persuasive.

Finally, regarding the distribution of the net proceeds, Counsel states:

"Although the two events took place in April and May of 1992, contributions and invoices for expenses associated with the two events continued to trickle in for several months after the May 21, 1992 event. Finally, in the late Summer or early Autumn of 1992, the gross receipts were determined, relative percentages of expenses and receipts were agreed, and distribution of revenues proceeded. It was determined in accordance with the agreement that 48.05 percent of the revenues were designated pursuant to the formula to Bush-Quayle '92 Primary Committee, Inc., 36.34 percent to the Ohio Republican Party Federal Account and the remaining 15.61 percent to the Ohio Republican Party State Account. The revenues and expenses were then paid and allocated in accordance with these ratios."

Again, Counsel has apparently overlooked the the provisions of 11 C.F.R. §9034.8, which require that expenses from a series of fundraising events be allocated

05070193005

among the participants on a per-event basis, regardless of whether the participants change or remain the same throughout the series.

In summary, the Committee has not complied with the recommendations outlined in the interim audit report. Specifically, the Committee has not obtained reimbursements from ORP-Federal or ORP-State; issued refunds of earmarked contributions to the contributors; or made a payment of \$26,575 (\$28,901-\$2,326) to the U.S. Treasury for unresolved excessive contributions.^{4/}

Recommendation #1

The Audit staff recommends that the Committee be required to make a payment to the U.S. Treasury in the amount of \$26,575 representing the value of unresolved excessive contributions.

950 / 0123006

^{4/} The check issued on 10/15/93 by Bush-Quayle '92 to reimburse the Committee remained outstanding as of 6/30/94. In lieu of reissuance, Bush-Quayle '92 paid \$2,326 to the U.S. Treasury via check dated 7/25/94. Consequently, the amount due to the U.S. Treasury is reduced accordingly.

950 / 019302 /

Proposed Final Audit Report



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

June 6, 1994

MEMORANDUM

TO: Robert J. Costa
Assistant Staff Director
Audit Division

THROUGH: John C. Surina
Staff Director

FROM: Lawrence M. Noble
General Counsel
Kim Bright-Coleman
Associate General Counsel

Kenneth E. Kellner
Assistant General Counsel

Jane J. Whang
Attorney

SUBJECT: Proposed Final Audit Report on the Republican Leadership Fund (LRA # 453/AR # 94-8)

The Office of General Counsel has reviewed the proposed Final Audit Report on the Republican Leadership Fund ("the Committee"). The Audit Division submitted the proposed Final Audit Report ("the Report") on the Committee to this Office on April 4, 1994. This memorandum contains this Office's legal analysis of the findings and recommendations in the proposed Report.^{1/} If you have any questions concerning this memorandum, please contact Jane Whang, the attorney assigned to this matter.

^{1/} Since the proposed Final Audit Report does not include matters exempt from public disclosure under 11 C.F.R. § 2.4, we recommend that the Commission's discussion of this document be conducted in open session. Throughout our comments, "FECA" refers to the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §§ 431-455, and "Matching Payment Act" refers to the Presidential Primary Matching Payment Account Act, 26 U.S.C. §§ 9031-9041.

95070193003

We generally concur with the Audit Division's findings concerning the excessive contributions (II.A.2), earmarked contributions (II.A.3), and distribution of net proceeds (II.A.4).^{2/} Our specific comments are set forth below.

I. EXCESSIVE CONTRIBUTIONS (II.A.2)

The Final Audit Report recommends that \$28,901 in excessive contributions to Bush-Quayle '92 Primary Committee, Inc. ("Bush-Quayle '92") be paid to the United States Treasury. Bush-Quayle '92 was notified of the Commission's policy regarding payment to the Treasury by letter dated June 2, 1992. The June 2, 1992 letter further informed that committee that refunds to contributors after the dates specified in the letter would not be recognized. Consistent with the Commission's letter, we agree that those excessive contributions should be paid to the Treasury.

9 5 0 7 0 1 9 3 0 9 9

We note further that nothing in the Act, Matching Payment Act, or the Commission's regulations prevents the Commission from requesting a payment to the Treasury. Indeed, the equitable doctrine of disgorgement supports the payment to the Treasury in this instance. See SEC v. Bilzerian, 814 F. Supp. 116, 120 (D.C. 1993); SEC v. Texas Gulf Sulphur Co., 446 F.2d 1301 (2d Cir. 1971), cert. denied, 404 U.S. 1005 (1971) (holding disgorgement to be an appropriate, non-punitive remedy). Apart from its remedial benefits, disgorgement has the practical advantage of eliminating the need for the Commission to monitor a committee's refunds.^{3/} In accordance with its express authority to formulate policy with respect to the statutes under its jurisdiction, the Commission has already adopted disgorgement in other circumstances. See, e.g., 11 C.F.R. § 9038.6 (Requiring stale-dated checks be paid to the Treasury). Disgorgement has also been requested in the enforcement and litigation contexts. See Matter Under Review 1704 (Directing respondents to pay an estimated \$350,000 to the United States Treasury for excessive contributions); and Plaintiff's Motion to Effectuate Judgment in FEC v. Populist Party, No. 92-0674 (D.D.C. filed May 4, 1993).

II. EARMARKED CONTRIBUTIONS (II.A.3)

The proposed Final Audit Report notes that the Committee had accepted contributions intended for other committees in the amount of \$8,675 (\$5,000 for the Bush-Quayle '92 Compliance Committee, \$2,000 for the Cuyahoga County Republican Party, and \$1,675 for the Ohio Republican Party). We concur in the Audit

^{2/} Parenthetical references are to the placement of findings in the proposed report.

^{3/} Similarly, a committee would be able to make one payment to the Treasury, as opposed to seeking out and making refunds to multiple contributors.

staff's belief that the Committee was precluded from accepting these contributions earmarked for other committees.

Although there is no statutory or regulatory provision directly on point, existing regulations provide guidance. A contribution made payable to an entity is presumed to be intended or earmarked to that entity. Cf. 11 C.F.R. § 9034.8(c)(7)(iv) (written instrument made payable to joint fundraising participant is earmarked to that participant unless written statement indicates that contribution is to be included in the general proceeds of fundraising activity). The regulations also require a joint fundraising committee to receive and allocate proceeds according to the participants' written agreement. 11 C.F.R. § 9034.8(c)(1). Specifically, the Joint Fundraising Agreement for the Committee stated "[a]ll checks for the Events shall be made payable to 'The Republican Leadership Fund'." The Fundraising Agreement did not authorize the Committee to allocate to the participants any contributions payable to non-participating committees. The Committee does not offer any further documentation or proof to support the contention that these contributions were for the Republican Leadership Fund. Therefore, the Committee appears to have incorrectly accepted and allocated contributions earmarked for other committees.

III. DISTRIBUTION OF NET PROCEEDS (II.A.4)

The proposed Final Audit Report notes that the Committee made excessive distributions to Bush-Quayle '92 in the amount of \$2,322; ORP-Federal in the amount of \$22,136; and ORP-State in the amount of \$12,904. These excessive distributions were due to the Committee's inclusion of contributions that were either excessive or earmarked. The Interim Audit Report recommended that the Committee obtain reimbursements for the above amounts. Bush-Quayle '92 responded that it had already refunded the amount recommended in the Interim Audit Report; however, the Audit division did not receive the documentation of a refunded check. We recommend that the Final Audit Report be revised to reflect that the Audit staff is currently requesting such documentation from the Committee.

95970193101



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

August 17, 1994

Mr. Keith Davis, Treasurer
c/o Huckaby & Associates
Republican Leadership Fund
228 S. Washington Street
Alexandria, VA 22314

Dear Mr. Davis:


Attached please find the Final Audit Report on the Republican Leadership Fund. The Commission approved this report on August 12, 1994. As noted on page 2 of the report, the Commission may pursue any of the matters discussed in an enforcement action.

In accordance with a Commission policy adopted on May 5, 1992, the Commission determined that the Committee must pay to the U.S. Treasury \$28,901 representing the value of unresolved excessive contributions. Of this amount, \$2,326 has been paid; the balance due the U.S. Treasury is \$26,575.

The Commission approved Final Audit Report will be placed on the public record on August 26, 1994. Should you have any questions regarding the public release of this report, please contact Mr. Ron Harris of the Commission's Press Office at (202) 219-4155.

Any questions you may have related to matters covered during the audit or in the report should be directed to Lorenzo David or Wanda Thomas of the Audit Division at (202) 219-3720.

Sincerely,


Robert J. Costa
Assistant Staff Director
Audit Division

Attachment as stated

95979193102

950 / 0193103

CHRONOLOGY
REPUBLICAN LEADERSHIP FUND

Pre-audit Inventory Commenced	4/5/93
Audit Fieldwork	4/5/93
Interim Audit Report to the Committee	12/8/93
Response Received to the Interim Audit Report	2/9/94
Final Audit Report Approved	8/12/94

95970193104