

June 25, 2007

Marlene R. Daughtrey  
Reports Division  
Federal Election Commission  
999 E St., NW  
Washington, D.C. 20463

Re: Response to Commission Inquiries

Dear Ms. Daughtrey:

I write to respond to six May 23, 2007 letter inquiries received from the Federal Election Commission (the "Commission") by the West Virginia Republican Party, Inc. ("WVRP"), with the assigned identification numbers C00417063, and C00081802. These letters asked questions related to the WVRP's March Monthly Report (2/01/06 - 2/28/06); April Monthly Report (3/01/06 - 3/31/06); July Monthly Report (6/01/06 - 6/30/06); October Quarterly Report (7/01/06); Amended October Monthly Report (9/01/06 - 9/30/06); and Year End Report (11/28/06 - 12/31/06). This letter addresses the Commission's questions related to each report.

The March Monthly Report (2/01/06 - 2/28/06)

The Commission asks for further information in connection with itemized disbursements disclosed in this report. Such clarification is available now to the Commission in the WVRP's amended report, filed with the Commission 06/25/2007.

April Monthly Report (3/01/06 - 3/31/06)

The Commission asks for further information in connection with itemized disbursements disclosed in this report. Such clarification is available now to the Commission in the WVRP's amended report, filed with the Commission 06/25/2007.

The July Monthly Report (6/01/06 - 6/30/06)

The Commission inquires about the "limited payments for administrative expenses" reported in the WVRP's above-referenced July Report, as well as the May (4/01/06 - 4/30/06) and June (5/01/06 - 5/31/06) Monthly Reports.

The WVRP reported its administrative expenses; however, amended reports filed with the Commission on 06/25/2007 will reflect payments reimbursing for certain itemized administrative costs.

The October Quarterly Report (7/01/06 - 9/30/06)

The Commission inquires about contributions received and reported by the WVRP from organizations that are not registered with the Commission - specifically, contributions from 11 different West Virginia county party organizations.

Under West Virginia state law, however, all money flowing into such organizations qualifies as "clean" money with respect to federal campaign finance law. See W. VA. CODE ANN. 3-8-8(a), 3-8-12(i). As such, any contributions received by the WVRP from these county party organizations fall within the limits and prohibitions of the Federal

\*\*\*\*\*

## ETEXT ATTACHMENT

Election Campaign Act.

The Amended October Monthly Report (9/01/06 - 9/30/06)

The Commission inquires about the "limited payments for administrative expenses" reported in the WVRP's above-referenced Amended October Report, as well as the August (7/01/06 - 7/31/06), Amended September (8/01/06 - 8/31/06), and Amended October Monthly Reports.

The WVRP reported its administrative expenses; however, amended reports filed with the Commission on 06/25/2007 will reflect payments reimbursing for certain itemized administrative costs.

The Year End Report (11/28/06 - 12/31/06)

The Commission's letter related to the above-referenced WVRP Year End Report asks three questions.

First, the Commission inquires about contributions received and reported by the WVRP from organizations that are not registered with the Commission - specifically, contributions from five different organizations. For the same reasons provided above in answer to the October Quarterly Report, the WVRP's acceptance of these contributions is in compliance with federal campaign finance law.

Second, the Commission inquires about a payment of \$2,283.66 for "Postage Fundraising Letter," and notes that any such expenditure for communications referencing a clearly identified federal candidate may constitute an in-kind contribution, coordinated expenditure, or independent expenditure, and should be reported accordingly. Further, your letter asks for clarification concerning expenditures made for the reported "Fundraising Event" Both the fundraising letter and event at issue were generic WVRP expenditures that did not clearly identify any federal candidate. As such, neither expenditure constituted an in-kind, coordinated, or independent expenditure to any federal candidate.

Finally, The Commission inquires about the "limited payments for administrative expenses" reported in the WVRP's above-referenced Year End Report. Specifically, you ask about the Amended 12 Day Pre-General Report (10/01/06 - 10/18/06), Amended 30 Day Post-General (10/19/06 - 11/27/06) and the Year End Report. For the reasons provided above in connection with the WVRP's July Monthly report, the WVRP's disclosed its administrative expenses in each of these; however, amended reports filed with the Commission on 06/25/2007 will reflect payments reimbursing for certain itemized administrative costs.

Please contact me with any questions.

Sincerely,

Theresa A. Waxman, Treasurer  
West Virginia Republican Party

\*\*\*\*\*