



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 4, 2010

Mr. Ron Bass, Treasurer
Orange County Republican Executive Committee
1320 N Semoran Blvd.
Suite 207
Orlando, FL 32807

Response Due Date:
April 8, 2010

Identification Number: C00443119

Reference: Year-End Report (7/1/09-12/31/09)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 8 items:

1. The beginning cash balance of this report should equal the ending balance of your Mid-Year Report (2/1/09-6/30/09). Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.
2. The totals listed on Lines 11(a)(i) and 11(a)(ii), Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. When an individual's aggregate exceeds the \$200 threshold, the amount should not be deducted from the Column B figure for Line 11(a)(ii). Please amend your report and any subsequent reports that may be affected by this correction.
3. The totals listed on Lines 6(c), 7, 11(a)(iii), 11(c), 11(d), 19, 20, 21(a)(i), 21(c), 29, 31 and 32, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B

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totals. Please amend your report and any subsequent reports that may be affected by this correction.

4. Schedule A supporting Line(s) 11(c) of your report discloses a receipt(s) from "Adams, Sandy," "Diebel, Karen," "Garcia, George Thomas," "Long, Ometrias Deon," "Long, William Todd," "Miller, Kenneth John" and "Putnam, Adam H" which requires further clarification. For example, if this activity represents a transfer of funds, please indicate "transfer" on Schedule A supporting Line 11(c) of your report. If this activity represents a reimbursement for services provided to this committee, please indicate this on Schedule A supporting Line 15 of your report. Please amend your report to clarify the type of activity this receipt(s) represents.

5. Your report includes multiple H1 Schedules. Please be advised that a State, District, or Local party committee should submit only one Schedule H1 to disclose the allocation ratio for shared administrative, generic voter drive, and exempt activity costs incurred. The Schedule H1 should be filed with the first report of each calendar year that discloses allocable activity. Please amend your report to clarify this discrepancy.

6. On Schedule H1 of your report, you have checked an incorrect fixed percentage for your allocated federal and non-federal administrative, generic voter drive and exempt activity costs. The fixed percentage for these costs is based on whether a Presidential and/or a Senate candidate appear on the State's ballot. Please amend your report to include a corrected Schedule H1 and note that a change in this ratio may make it necessary to repay your non-federal account for any overpayments that may have been made. While the Commission may take further legal action concerning any impermissible overpayments by the non-federal account, your prompt action will be taken into consideration. 11 CFR §106.7(d)(2) and (3)

7. On Schedule H4, your allocated activity or event year-to-date total calculations for the Administrative category are incorrect. Allocated activity or event year-to-date totals for administrative, voter drive, exempt activity costs and expenses for public communications made by PACs referencing only political parties are derived by aggregating all disbursements during the calendar year for each separate category. Allocated activity or event year-to-date totals for fundraising and direct candidate support activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous event year-to-date total for that category or event. This running event year-to-date total should be disclosed after each disbursement is

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listed. Please amend your report by providing the correct event year-to-date totals.

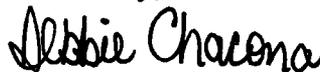
8. On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, your committee discloses a disbursements for "Allocated Rent, Office & Phone" and lists itself (Orange County Republican Executive Committee) as the payee. Please clarify the nature of this transaction or amend Schedule H4 by providing the correct name and mailing address of the payee.

- Schedule H4 of your report discloses activity which is 100% federal. For future reporting, please be advised that any activity which is financed entirely by the federal account (including administrative expenses), should be reported on Schedule B supporting Line 21(b).

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1393.

Sincerely,



For: Sylvette S. Garnes
Senior Campaign Finance Analyst
Reports Analysis Division

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