

Response to FEC Letter of March 23, 2009, requesting additional information (Reference: 30 Day Post-General Report (10/16/08 - 11/24/08))

Item 1. Amendments made to the October Monthly Report and the 12 Day Pre-General Report are now reflected in this amended 30 Day Post-General Report, and the 'Calendar Year-to-Date' totals are now correct.

Item 2. The memo entries on Schedule A supporting Line 11(a)(i) provide the disclosure required by 11 CFR 102.17(c)(8) to itemize the Republican Party of Virginia's (RPV) share of gross receipts from joint fundraising. The Schedule A, Line 12 entry on page 87 of the amended Report shows receipt of funds of \$5213.00 on 10/30/08 as a transfer from Joint Fundraising Representative (JFR), the Gilmore Victory Committee. The Schedule A, Line 11(a)(i) memo entries totaling \$13,600.00 itemize the gross receipts associated with this transfer. As can be seen in the 'Subtotal of Receipts' at the bottom of each page of Schedule A, the amounts of these memo entries are not included in total receipts. The \$8387.00 difference between the total memo entries amount and the total JFR transfer amount represents the RPV's share of expenses incurred and reported by the Gilmore Victory Committee. The Line 30(b) amount of \$2162.68 identified as memo entries on Schedule B is explained below in the Item 6 response of this letter.

Item 3. This contribution was incorrectly reported as having been made to Drake-Virginia Victory Committee. The report has been amended to show that the RPV made the contribution to Drake Victory Fund on Schedule B, Line 23.

Item 4. To ensure that no national party committee funds are used to pay for Exempt Party Activities, the RPV maintains a separate Transfer Account into which it deposited transfers from the Republican National Committee (RNC), on various dates from time period of 10/16/08 thru 11/12/08 for total amount of \$1,199,400.08 as reported on Line 12 of this report. RPV subsequently used these RNC transferred funds to pay for Election Day Operations expenses, for postage and printing expenses for generic GOTV mailers, and for generic GOTV phone calls, as reported on Schedule B, Line 30(b) of this report. The RPV made its Exempt Party Activity disbursements for postage and mailers, signs and door hangers from a separate Victory Account containing permissible Federal funds. No national party committee funds were used to pay for these items. These disbursements for postage and mailers, signs and door hangers represent volunteer activity that meets the definition of Exempt Party Activity as set forth in 11 CFR 100.87 and 100.147.

Item 5. The following Schedule B, Line 30(b) disbursements have been amended to clarify description and disclose candidate: BBPR on 11/7/08; BMS Direct on 10/28/08; Digital Ink on 11/7/08; Executive Press on 10/29/08; Majority Strategies on 11/3/08; Postmaster on 10/17, 10/21, 10/22, 10/24, 10/28, 10/29, 11/1 and 11/20/08; Prime Signs LLC on 10/17 and 10/24/08; Targeted Creative Communications on 10/22, 10/28 and 11/3/08; and the Stoneridge Group on 10/21, 10/22, 10/23, 10/31 and 11/3/08. These disbursements represent volunteer activity that meets the definition of Exempt Party Activity as set forth in 11 CFR 100.87 and 100.147. The payments made to FedEx Kinkos on 10/29 and 11/4/08 for 'printing EDO materials' was for an instruction manual for Election Day Operations personnel.

Item 6. With respect to Schedule B, Line 30(b), a payment of \$3879.23 was made to credit card 'Platinum Plus for Business' on 10/30/08. This was entered as a Schedule D, Line 10 - Debts and Obligations payment, and the FEC software being used does not allow a breakdown of individual vendors through this payment entry method. They must be entered manually and are scattered throughout the report. The 30(b) amount of \$2162.68 mentioned in your Item 2 request are disbursements made to James River Bus Line on 10/30/08 for \$1564.13 and to Letters in Vinyl on 10/30/08 for \$598.55 and to James River Bus Line on 10/30/08 for \$1564.13. The disbursement to Staples on 10/30/08 for \$1716.55 makes up the remaining total of \$3879.23 of this 30(b) payment.

Item 7. Expenditures for the Fundraising Consultant were for services provided for fundraising events that only benefited the Republican Party of Virginia, and were not made on behalf of any specifically identified federal candidate.

ETEXT ATTACHMENT

Item 8. Schedule F has been amended to reflect the proper office sought for James S. Gilmore III, the federal candidate supported - Senate.