



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-1

November 14, 2008

Joseph Blevins, Treasurer
Napa County Republican Party
4166 Burgundy Way, P.O. Box 3263
Napa, CA 94558-2501

**Response Due Date:
December 15, 2008**

Identification Number: C00455659

Reference: Statement of Organization, received 10/08/08

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 2 items:

1. On Line 5(d) of your Statement of Organization, it appears that your committee underlined the words "subordinate" and "Republican." In addition, you have indicated "County GOP Committee" on the form. Please be advised, a subordinate party committee is defined as the organization which, by virtue of the bylaws of a political party, is responsible for the day-to-day operation of such political party at the city, county, neighborhood, ward, district, or precinct level. 11 CFR §100.14(b) and (c) If your committee is in fact a subordinate committee of the California Republican Party/V8 Committee, please amend your Statement of Organization to indicate "SUB" and "REP" in the boxes provided on Line 5(d).

2. You have indicated "NONE" on Line 6 of your Statement of Organization which indicates that your committee is a local party committee that is not affiliated with the California Republican Party/V8 Committee. However, pursuant to 11 CFR §110.3(b)(3), all contributions made by political committees established, financed, maintained, or controlled by the State party committee and by subordinate State party committees shall be presumed to be made by one political committee.

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This presumption shall not apply if the political unit in question has not received funds from any other political committee established, financed, maintained, or controlled by any party unit and the political committee of the party unit in question does not make contributions in cooperation, consultation or concert with, or at the request or suggestion of any other party unit or political committee established, financed, maintained, or controlled by another party unit. Further, 11 CFR §100.5(e)(4) defines a party committee as a political committee which represents a political party and is part of the official party structure at the national, State, or local level. Please clarify whether your committee is independent from the California Republican Party/V8 Committee per 11 CFR §110.3(b)(3) and if not, please amend Line 6 of your Statement of Organization to reflect this relationship as "affiliated."

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) 694-1162.

Sincerely,



David Butler
Campaign Finance Analyst
Reports Analysis Division

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