FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Robert K. Wilson, Treasurer
Ohio Republican Party
172 E. State Street
Columbus, OH 43215

MAR 19 1997

Identification Number: C00162339

Reference: 12 Day Pre-General Report (10/1/96-10/16/96)

Dear Mr. Wilson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please clarify all expenditures made for Party Building Media on Schedule H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or F supporting Line 23 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

-Schedule A supporting Line 12 discloses a transfer-in from the Republican National Committee. Schedule B supporting Line 21(b) reflects payments for various exempt activities. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used including distribution by direct mail; all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR 100.7(b)(15) and (17) and to the Campaign Guide for Party Committees.

Please clarify the nature of the transfers-in and subsequent payments for all of the exempt activities. If the activity disclosed on your report does not meet the definition of "exempt" activity as described above and if any

portion of the expenditures were made on behalf of specifically identified candidates, that amount must be disclosed on Schedule B or F supporting Line 23 or 25 of the Detailed Summary Page as appropriate.

-Please clarify the purpose of disbursements for Mastercard Monthly Fees. Payments made to credit card companies must identify the original vendors from which you have purchased an item or service if your payments to these vendors have exceeded $200 this year. Please amend your report by providing the date, amount, and purpose of such payments as required by 11 CFR §104.9(b).

-You must make an attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than $200 in a calendar year. Please amend your report to include the omitted information.

A committee may demonstrate "best efforts" to obtain the required information by providing the Commission with a description of its procedures for requesting the information and may also supply a copy of a solicitation: the committee must request the contributor information in initial solicitations; make follow-up requests (if necessary); report the information; and file amendments to disclose previously unreported information. Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that exceeds the $200 threshold but lacks contributor information, the committee must, within 30 days, make an additional written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle. Furthermore, if a committee receives contributor information after the contributions have been reported, it must submit, with its next report, an amended memo Schedule A listing all the contributions for which additional information was received or file, on or before the next reporting date, amendments to

the previous reports on which the contributions were originally disclosed. See 11 CFR §104.3(a)(4)(i) and 11 CFR §104.7.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Melissa Hurd

Melissa Hurd
Reports Analyst
Reports Analysis Division