



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

August 7, 2012

ROB KREMER, TREASURER
OREGON REPUBLICAN PARTY
PO BOX 1586
LAKE OSWEGO, OR 97035-0786

Response Due Date
09/11/2012

IDENTIFICATION NUMBER: C00153031

REFERENCE: APRIL MONTHLY REPORT (03/01/2012 - 03/31/2012)

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 item(s):

1. Schedule H4 supporting Line 21(a) of your report discloses a payment(s) for "Party Communication Services" and "Party Printing." Please be advised that 11 CFR §100.24(b) defines as Federal Election Activity, Generic campaign activity conducted in connection with an election in which one or more candidates for Federal office appear on the ballot. In addition, 11 CFR §100.25 defines Generic campaign activity as a public communication that promotes or opposes a political party and does not promote or oppose a clearly identified Federal candidate or non-Federal candidate.

Furthermore, the costs for this type of Federal Election Activity must either be paid with federal funds or allocated between federal and Levin funds. It appears that you have allocated these costs between federal and non-federal funds. Any reimbursement from your committee's non federal account for Federal Election Activity costs is not permissible and must be returned. (11 CFR §§300.32 and 300.33)

Please inform the Commission of your corrective action immediately or provide clarifying information regarding this activity. Although the Commission may take further legal action regarding this apparent prohibited activity, your prompt action will be taken into consideration.

2. Your Amended February Monthly (1/1/12 - 1/31/12), received 8/01/12, Amended March Monthly (2/1/12 - 2/29/12), received 3/23/12 and April

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Monthly (3/1/12 - 3/31/12) Reports combined disclose limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Each state, district or local party committee utilizing separate federal and non federal accounts is required to allocate any administrative expenses (excluding salary) between the accounts according to a fixed percentage selected on Schedule H1. A Schedule H1 must be filed with the first FEC FORM 3X filed at the beginning of each calendar year. Payments for salary and wages for employees who spend more than 25% of their compensated time on Federal election activities or on activities in connection with a Federal election must be made from a federal account and disclosed on a Schedule B supporting Line 30(b) of the Detailed Summary Page. (11 CFR §106.7)

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b. Payments to a consulting, law or accounting firm will be considered acceptable for salary.

Clarification regarding administrative expenses should be provided during each two year election cycle beginning with the first report filed in the non election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

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

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Reports Analysis Division) or my local number (202) 694-1172.

Sincerely,

A handwritten signature in black ink, appearing to read 'AB', with a stylized flourish at the end.

Alexandra Broomhead
Senior Campaign Finance Analyst
Reports Analysis Division

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