



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

October 28, 2009

Mr. Robert Harms, Treasurer  
North Dakota Republican Party  
1029 N 5th Street  
Bismarck, ND 58501

Response Due Date:  
December 2, 2009

Identification Number: C00018929

Reference: October Monthly Report (9/1/09-9/30/09)

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 3 items:

1. Your August Monthly (7/1/09-7/31/09), September Monthly (8/1/09-8/31/09), and October Monthly (9/1/09-9/30/09) 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. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule(s) B supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

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.

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Clarification regarding administrative expenses should be disclosed during each two-year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If volunteers have provided these services, please confirm this in writing.

2. Schedule C discloses the due date for a loan owed by your committee to be 8/24/10 and the interest rate to be 4.5%. Schedule C-1 discloses the due date to be 8/20/09 and the interest rate to be 5.0%. Please amend your report to clarify this discrepancy.

3. Please clarify all expenditures made for "Schafer Event Expense," "Round-Up Exp/Fundraising," "Printing Expense/Fundraising," and "Postage/Fundraising" on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E, or F supporting Lines 23, 24, or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

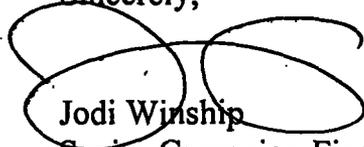
-Please be advised that while loans and lines of credit must be continuously reported on a Schedule C until they are repaid, Schedule C-1 need only be filed when a loan/line of credit is established and in succeeding reporting periods only when the terms of the loan/line of credit are restructured or any draws are made on the line of credit.

**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) 694-1136.

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Sincerely,

A handwritten signature in black ink, appearing to read "Jodi Winship". The signature is stylized with large, overlapping loops.

Jodi Winship  
Senior Campaign Finance Analyst  
Reports Analysis Division

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