FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

November 20, 1997

Jack C. Hunter, Treasurer
Ohio Republican State Central &
Executive Committee
211 S Fifth Street
Columbus, OH 43215

Identification Number: C00162339

Reference: Mid-Year Report (1/1/97-6/30/97)

Dear Mr. Hunter:

This letter is to inform you that as of November 19, 1997, the Commission has not received your response to our request for additional information, dated October 29, 1997. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Melissa Hurd on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

FEDERAL ELECTION COMMISSION
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RQ-2

OCT 29 1997

Jack C. Hunter, Treasurer
Ohio Republican State Central
& Executive Committee
211 S Fifth Street
Columbus, OH 43215

Identification Number: C00162339

Reference: Mid-Year Report (1/1/97-6/30/97)

Dear Mr. Hunter:

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:

-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.

-You have received contributions from numerous entities, which appear to be unincorporated proprietorships or partnerships. Generally, these types of contributions are to be attributed to each person based on their percentage of ownership in the firm. Each person who has contributed in excess of $200 since January 1 should be identified by name, address, occupation, name of employer, amount of contribution, and aggregate total on Schedule A. 11 CFR §110.1(k) Please amend your report by providing the omitted information.

-Line 21(a)(i) of the Detailed Summary Page of your report discloses a total of $210,027.50 in the Federal Share of Operating Expenditures. The sum of the entries itemized on Schedule H4, however, indicates the total to be $211,471.59. Please amend your report to clarify the discrepancy.

-Line 21(a)(ii) of the Detailed Summary Page of your report discloses a total of $795,043.71 in the Non-Federal Share of Operating Expenditures. The sum of the entries itemized on Schedule H4, however, indicates the total to be $799,838.33. Please amend your report to clarify the discrepancy.

-Schedule H3 discloses the receipt of reimbursements from your non-federal account for county dues administrative event(s) which is listed as 100% non-federal on Schedule H4. A committee is permitted to pay the entire amount of an allocable activity from its federal account and receive a transfer(s) from its non-federal account solely to cover the non-federal share of the allocable expense(s). 11 CFR §106.5(g)(i). However, a 100% non-federal administrative event does not fall within the definitions of an allocable expense, and constitutes an impermissible transfer of funds received by your federal account from your non-federal account.

The Commission recommends you immediately transfer the total amount received by your federal account back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Schedule D discloses $267,192.55 in payment(s) this period to Strategic Telecommunications; however, there are $250,476.90 in payments reflected on your disbursement schedules. Please amend your report to clarify this discrepancy.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Interest earned from a bank account should be properly disclosed on a separate Schedule A, supporting Line 17 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

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

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