



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

December 17, 2003

Gregory Gandrud, Treasurer  
Santa Barbara County Republican Central Committee  
1493 Chaparral Drive  
Carpinteria, CA 93013

**Response Due Date:**  
**January 16, 2004**

Identification Number: C00174334

Reference: Mid-Year Report (1/1/03-6/30/03)

Dear Mr. Gandrud:

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. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule H2 indicates the allocation ratios for "2002 Fully State," and "2003 Administrative" were revised during the reporting period. Please provide the date of the fundraising program or event. In the case of a telemarketing or direct mail campaign, the "date" is the last day of the telemarketing campaign, or the day on which the final direct mail solicitations are mailed. 11 CFR §§106.6(d)(2) and 106.7(d)(4)(ii) In the event that an excessive non-federal transfer was received, the excessive amount should be transferred back to your non-federal account.

-On Schedule H2, you have failed to check the Type of Activity box for several activities/events. Please amend your report to correct these omissions. 11 CFR §§104.10 and 104.17

-Schedule H4 discloses a disbursement(s) which is categorized as direct candidate support; however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the payment for direct candidate support in which the committee collects both federal and non-federal funds. The costs are allocated according to the time and space method or funds received ratio and reported on Schedule H2. 11 CFR §§104.10(a) and 104.17(a) Please file a Schedule H2 to disclose the ratio for the direct candidate support activity.

-Please be advised that Schedule H2 is used for shared federal and non-federal fundraising and direct candidate support activity. The ratio for shared administrative expenses is derived from the Schedule H1 and should not be included on your Schedule H2. Please amend your report to clarify this discrepancy.

-Schedules H2 and H4 disclose 100% non-federal activity. Please be advised that by definition, this activity does not qualify as a shared expense to be allocated between your federal and non-federal accounts. This activity should be itemized on a Schedule B for Line 21(b) of the Detailed Summary Page. Any reimbursement from your committee's non-federal account for any portion of this activity is not permissible and must be returned. Please amend your report to clarify this discrepancy.

-Schedule B supporting Line 21(b) of your report discloses payment(s) for "FEA 100% Federal: Monthly dinner," "FEA 100% Federal:", "FEA 100% Federal: Meals," and "FEA 100% Federal: 31 Dinners" which appears to be disclosed on the wrong line of the Detailed Summary Page. Please be advised that Federal Election Activity that is paid entirely with federal funds should be reported on Line 30(b). 11 CFR §100.24 Please amend your report to properly disclose this activity on a separate Schedule B supporting Line 30(b).

**Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. 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.**

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 1, then press 2 to reach the Reports Analysis Division) or my local number (202) 694-1135.

Sincerely,



Maureen Benitz

Campaign Finance Analyst  
Reports Analysis Division

