



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

RQ-2

MAR - 5 1997

Barton Delacy, Treasurer
Oregon Republican Party
8196 S.W. Hall Blvd., Suite 101
Beaverton, OR 97005

Identification Number: C00153031

Reference: 30 Day Post-General Report (10/17/96-11/25/96)

Dear Mr. Delacy:

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:

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B of your report to clarify the following description(s): volunteer expense and victory 96 - collateral. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule A supporting Line 12 of the Detailed Summary Page, and Schedule H4 supporting Line 21(a) of the Detailed Summary Page discloses in-kind transfers and disbursements. Please clarify the nature of this activity (i.e. services provided).

-Schedule H3 of your report (pertinent portions attached) discloses transfers-in from the RNC Non-Federal Operating Account to pay for Administrative/Voter Drive expenses of your committee. Please note that 11 CFR 106.5 (g)(1)(i) permits a committee to "pay the entire amount of an allocable expense from its federal account and shall transfer from its non-federal account to its federal account solely to cover the non-federal share of that allocable expense" (emphasis added). As the RNC Non-Federal Operating Account is not a non-federal account of your committee, such transfers are prohibited.

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If the transfers in question were incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have received prohibited transfers, you must transfer-out the impermissible funds to an account not used to influence federal elections or refund the full amount to the RNC Non-Federal Operating Account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited transfers, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

-Please clarify all expenditures made for candidate assistance and phone banks on Schedules B and 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)

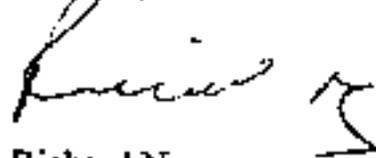
-Schedules H2 and H4 of your report discloses activity which is 100% federal. For future reporting, please be advised that any activity which is financed entirely by the federal account (including Administrative expenses), should be reported on Schedule B supporting Line 21(b), not Schedule H4 supporting Line 21(a)(i). 11 CFR 106.5

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

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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,

A handwritten signature in cursive script, appearing to read "Richard Ng", followed by a stylized flourish or mark.

Richard Ng
Reports Analyst
Reports Analysis Division

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RECEIPT SCHEDULE H3
(effective 1/1/81)

**TRANSFERS FROM
NON-FEDERAL ACCOUNTS**

NAME OF COMMITTEE OREGON REPUBLICAN PARTY	TOTAL AMOUNT TRANSFERRED
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NAME OF ACCOUNT (IN-KIND TRANSFER) RNC Non-FEDERAL OPERATING ACCOUNT	DATE OF RECEIPT 10-23-96	\$ 6,040.44
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	BREAKDOWN OF TRANSFER RECEIVED		
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
b) Total Administrative/Voter Drive	6,040.44		
i) Direct Fundraising (List Events-Amount for Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Direct Fundraising			
ii) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Exempt Activity/Direct Candidate Support			

NAME OF ACCOUNT (IN-KIND TRANSFER) RNC Non-FEDERAL OPERATING ACCOUNT	DATE OF RECEIPT 10-23-96	\$ 18,792.18
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	BREAKDOWN OF TRANSFER RECEIVED		
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
b) Total Administrative/Voter Drive	18,792.18		
i) Direct Fundraising (List Events-Amount for Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Direct Fundraising			
ii) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Exempt Activity/Direct Candidate Support			

	TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED		
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
SUBTOTAL THIS PAGE	24,832.62		24,832.62
TOTAL THIS PERIOD			

RECEIPT SCHEDULE H3
(Effective 1/1/91)

**TRANSFERS FROM
NON-FEDERAL ACCOUNTS**

NAME OF COMMITTEE OREGON REPUBLICAN PARTY			TOTAL AMOUNT TRANSFERRED
NAME OF ACCOUNT (IN-KIND TRANSFER) RNC NON-FEDERAL OPERATING ACCOUNT		DATE OF RECEIPT 10-25-96	\$ 23,803.42
BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
i) Total Administrative/Voter Drive	23,803.42		
ii) Direct Fundraising (List Events-Amount for Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Direct Fundraising			
iii) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Exempt Activity/Direct Candidate Support			
NAME OF ACCOUNT (IN-KIND TRANSFER) RNC NON-FEDERAL OPERATING ACCOUNT		DATE OF RECEIPT 10-25-96	\$ 6,785.90
BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
i) Total Administrative/Voter Drive	6,785.90		
ii) Direct Fundraising (List Events-Amount for Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Direct Fundraising			
iii) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)			
a)			
b)			
c)			
d)			
e) Total Amount Transferred For Exempt Activity/Direct Candidate Support			
TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DCS
SUBTOTAL THIS PAGE	30,589.32		30,589.32
TOTAL THIS PERIOD	245,421.94		245,421.94

