



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

February 1, 2012

CHRIS STEINBRUNER, TREASURER
MONTEREY COUNTY REPUBLICAN CENTRAL
COMMITTEE (FED.)
100 CLOCK TOWER PLACE SUITE 120
CARMEL, CA 93923-8771

Response Due Date
03/07/2012

IDENTIFICATION NUMBER: C00389981

REFERENCE: AMENDED SEPTEMBER MONTHLY REPORT (08/01/2011 - 08/31/2011),
RECEIVED 09/22/2011

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 5 item(s):

1. Please amend your report by providing the address for each disbursement itemized on Schedule(s) B and H4 supporting Line(s) 21(b) and 21(a)(i). (11 CFR §§104.3(a)(4) and 104.10(4))
2. Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) B of your report to clarify the following description(s): "Political Consulting." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).
3. On Schedule H4, your allocated activity or event year-to-date total calculations for the Administrative category are incorrect. Allocated activity or event year-to-date totals for administrative, voter drive, exempt activity costs and expenses for public communications made by PACs referencing only political parties are derived by aggregating all disbursements during the calendar year for each separate category, not by individual purpose such as "Utilities" or "Rent". Please amend your report by providing the correct event year-to-date totals. (11 CFR §§104.10(b)(2) and 104.17(b)(1)(ii))
4. Schedule H4 of your report discloses reimbursements to individuals for "Reimbursement for Postage." Please be advised that when itemizing

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reimbursements to individuals for goods or services, payment to the original vendors must be itemized as memo entries regardless of amount. Each memo entry must include the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information and clearly identify on the Schedule H4, which reimbursement each memo entry relates to. (11 CFR § 104.10 and 104.17, and Advisory Opinions 1992-1 and 1996-20, footnote 3)

5. Schedule H4 of your report discloses disbursements for the Administrative category which use a ratio that is inconsistent with the ratio disclosed on Schedule H1. The fixed ratio for the allocation of administrative, generic voter drive and exempt activity expenses by State, district and local party committees should be the same for the full two-year election cycle, unless a Special election is scheduled during an odd numbered year. Please amend your report to clarify this apparent discrepancy.

Please note that if your non-federal account has overpaid your federal account because of this miscalculation, it will be necessary to immediately transfer these funds back to the non-federal account. While the Commission may take further legal action concerning any impermissible overpayments by the non-federal account, your prompt action will be taken into consideration. (11 CFR §§106.7(d))

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) 694-1172.

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Sincerely,

A handwritten signature in black ink, appearing to read 'Alexandra Broomhead', with a stylized, cursive script.

Alexandra Broomhead
Senior Campaign Finance Analyst
Reports Analysis Division

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