



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

February 11, 2015

SHANE PATRICK CONNOLLY, TREASURER
SANTA CLARA COUNTY REPUBLICAN
PARTY(FED)
522 N MONROE STREET
SAN JOSE, CA 95128-1338

Response Due Date
03/18/2015

IDENTIFICATION NUMBER: C00415075

REFERENCE: YEAR-END REPORT (11/25/2014 - 12/31/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 2 item(s):

1. The Detailed Summary Page, on Line 18(a) Column A of your Amended 12 Day Pre-General (10/1/14-10/15/14), received 12/3/14, Amended 30 Day Post-General (10/16/14-11/24/14), received 1/31/15, and Year-End (11/25/14-12/31/14) Reports combined, discloses \$40,677.48 in transfers from the non-federal account for allocated activity for the reporting period. However, Line 21 (a)(ii) Column A discloses \$33,267.21 as the non-federal share for allocated activity for the reporting period. While the non-federal account is permitted to transfer funds to the federal account for allocated activity, transfers for allocated activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. (11 CFR §§106.6(e)(2) and 106.7(f)(2)) Please clarify the nature of the transfers-in from the non-federal account.

The Commission recommends that you immediately transfer back to the non-federal account, the total excessive amount which was received by your federal account outside the 70-day time period. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

2. Schedule H3, supporting Line 18(a) discloses -\$1,161.14 in transfers from what appears to be the non-federal account of your committee.

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If these entries were intended to represent a transfer(s) out or a reimbursement(s) to your non-federal account, they should be properly disclosed on a separate Schedule B, supporting Line 29 of the Detailed Summary Page. Please amend your report and / or provide further clarification regarding these negative receipts from your non-federal.

You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. If any of these disbursements were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in kind contributions on Schedule B supporting Line 23, independent expenditures on Schedule E supporting Line 24, or as coordinated expenditures on Schedule F supporting Line 25. (11 CFR §§104.3(b)(3) and 106.1) In addition, if your non-federal account has paid any expenditures which should have been allocated, you are advised to correct any non compliance with 11 CFR §§106.6 and 106.7 and establish procedures to insure future compliance with allocation regulations.

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) 694-1147.

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Sincerely,

A handwritten signature in black ink that reads "Maureen Benitz". The signature is written in a cursive style with a large, stylized 'M' and 'B'.

Maureen Benitz
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

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