



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

October 1, 2012

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

Response Due Date
11/05/2012

IDENTIFICATION NUMBER: C00389981

REFERENCE: APRIL MONTHLY REPORT (03/01/2012 - 03/31/2012)

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 3 item(s):

1. Schedule H3 of your report discloses a transfer(s) in from a non federal account(s) for the Administrative category, which appears to exceed the permissible amount(s) indicated by your allocation ratio for this activity/event. Please be advised that transfers for allocated activity must not exceed the non federal share of the joint disbursements and that these transfers must be made within a 70 day time period: no more than 10 days before or 60 days after payment to the vendor. (11 CFR §§106.6(e)(2) and 106.7(f)(2)) Please clarify the nature of this transfer(s) in from the non federal account.

The Commission recommends that you immediately transfer the total excessive 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.

2. 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. Allocated activity or event year-to-date totals for fundraising and direct candidate support activities are derived by aggregating all disbursements during the calendar year within a

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specific event. These should be calculated by adding the latest disbursement for a category or event to the previous event year-to-date total for that category or event. This running event year-to-date total should be disclosed after each disbursement is listed. 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))

3. 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): "Voter Registration." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

- Schedule B supporting Line 21(b) of your report discloses a payment(s) for "Voter Registration" which appears to be disclosed on the wrong line of the Detailed Summary Page. For your information and consideration when preparing future filings, please be advised that Voter Identification, Generic Campaign and Get-out-the-vote activity conducted in connection with an election in which one or more candidates for Federal office appear on the ballot is considered to be Federal Election Activity and should be disclosed on Schedule B for Line 30(b) of the Detailed Summary Page. (11 CFR §100.24) For your next filing, please refer to the instructions for each line when determining the proper categorization(s).

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 flourish at the end.

Alexandra Broomhead
Senior Campaign Finance Analyst
Reports Analysis Division

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