



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

June 13, 2007

Mr. J. Peter Clements, Treasurer  
Republican Party of Virginia Inc  
115 East Grace Street  
Richmond, VA 23219

**Response Due Date:**  
**July 16, 2007**

Identification Number: C00001305

Reference: April Monthly Report (3/01/07 – 3/31/07)

Dear Mr. Clements:

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.** Additional information is needed for the following 3 items:

1. Please clarify all expenditures made for "Voter Survey" on Schedule(s) B. If a portion or all of these expenditures were made for activity that promotes or opposes a Federal candidate, but does not qualify as exempt party activity, this amount should be disclosed on Schedule B or F supporting Lines 23 or 25. 11 CFR §§104.3(b), 104.17(a) and 106.1
2. Schedule H1 of your February Monthly Report (1/01/07 – 1/31/07) indicates that the federal percentage for allocated administrative, generic voter drive and exempt activity costs is 15%. However, based on Commission calculations, the federal percentage used by your committee should be 36% for the 2007-2008 election cycle. Furthermore, Schedule H3 discloses a non-federal transfer(s) received based on a 15% federal ratio. Please clarify this discrepancy and transfer the excessive non-federal amount back to the non-federal account, if appropriate.
3. Schedule H2 of your report discloses an activity which is listed as 100% non-federal. A committee is permitted to pay the entire amount of an allocable activity from its federal account and receive a transfer(s) from its non-federal account solely to cover the non-federal share of the allocable expense(s). 11 CFR §§106.6(e) and 106.7(f) However, a 100% non-federal activity/event does not fall within the definitions of an allocable expense. Any transfer from a non-federal account to pay for such an activity would

constitute an impermissible transfer of funds received by your federal account from your non-federal account.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received on or before the due date noted above to 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 5 to reach the Reports Analysis Division) or my local number (202) 694-1398.

Sincerely,



Michael H. Hartsock  
Senior Campaign Finance Analyst  
Reports Analysis Division

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