

May 28, 2009

Ms. Alexandra T. Broomhead
Campaign Finance Analyst
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Ms. Broomhead:

The Oregon Republican Party is in receipt of your Request for Additional Information dated May 8, 2009, concerning our amended 2008 12-day Pre-General FEC report.

The Party has reviewed the transfers received from the Republican National Committee, and all payments made for "Volunteer-exempt yard signs" and "Volunteer exempt brochures" as referenced in your letter. These payments were not for public advertising, and neither the campaign materials nor the mailings were distributed by direct mail (i.e., by a commercial vendor or from commercial lists). All mailings were prepared by volunteers and all distribution of campaign materials was done by volunteers. All funds used for the activities were permitted under the Federal Election Campaign Act, as amended. None of the funds used were designated for a particular candidate, and no payments for the activities were made using any transfers-in received from the RNC or from any national party committee.

Therefore, these disbursements met the Commission's requirements as exempt from the definition of a contribution or expenditure on behalf of any specifically identified federal candidate. The payments are correctly itemized on Schedule B for Line 30b, and do not require a Schedule E or Schedule F for Lines 24 or 25.

The Party has filed an amended 2008 12-day Pre-General report to reflect that the Schedule H3 transfers from our non-federal account came from the Oregon Non-Fed State Account c/o Key Bank.

The Party has reviewed the disbursements reported on Line 21b that were described as "List purchase-OR GOP" and "List rental-OR GOP". These expenditures were for Party fundraising purposes, and were not expenditures for Voter Identification, Generic Campaign or Get-out-the-vote activity conducted in connection with an election in which one or more candidates for Federal office appeared on the ballot (and thus do not qualify as Federal Election Activity). As Party fundraising expenditures, these payments are properly itemized on Schedule B for Line 21b.

Sincerely,

Dennis Morgan
Treasurer
