



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 8, 2009

Dennis Morgan, Treasurer
Oregon Republican Party
P.O. Box 25406
Portland, OR 97298

**Response Due Date:
June 15, 2009**

Identification Number: C00153031

Reference: Amended 30 Day Post General Report (10/16/08 - 11/24/08), filed
1/24/09

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 7 items:

1. Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.2(d) prohibit a state, district or local party committee (combined) from receiving any contribution from a multicandidate political committee in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

29030084666

OREGON REPUBLICAN PARTY

Page 2

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

2. Schedule A of your report discloses an aggregate year-to-date total(s) for a contribution(s) received from "Wes Lematta" which appears to be incorrect. Please amend your report to provide the correct aggregate year-to-date total(s).

3. Schedule A supporting Line 12 of your report discloses \$15,700 in activity identified as MEMO entries that do not appear to correspond with any itemized transaction(s). Please be advised, a memo entry is used to disclose additional information about an itemized transaction and the amount of a memo entry is not included in the total receipts or disbursements for the report. Please amend your report to provide clarifying information regarding this activity.

4. Schedule L-B supporting Line 5 of Schedule L of your report discloses \$31,040 in disbursements for "Volunteer-exempt brochures," which appears to be a payment(s) made for Federal Election Activity with 100% Levin funds. Please be advised that a State, district, or local committee of a political party may pay for allocable Federal Election Activity expenses either entirely with Federal funds or with an allocation of Federal and Levin funds. It appears you have used impermissible funds to pay for this allocable Federal Election Activity. 11 CFR §300.32(c)(4)

Please be advised that 11 CFR §102.5 prohibits a non-federal or Levin account from financing activity in connection with federal elections. The Commission recommends that you immediately transfer the federal portion of this allocable Federal Election Activity to your non-federal or Levin account and disclose this transaction as a transfer-out on Schedule B supporting Line 22 of the Detailed Summary Page, and as a receipt on Schedule L-A supporting Line 2 of Schedule L, or provide clarifying information regarding the apparent impermissible payment(s).

Although the Commission may take further legal action regarding the activity conducted by your non-federal or Levin account, any clarifying information that you can provide will be taken into consideration.

5. Schedule A supporting Line 12 discloses a transfer(s)-in from the "National Republican Senatorial Committee" and the "Republican National Committee." Schedule(s) B supporting Line 30(b) reflects payments for

29030084667

“Volunteer-exempt brochures” and “Volunteer-exempt yard signs.” Please be advised that a state or local party committee may pay for campaign materials (such as bumper stickers, pins and yard signs) that are distributed by volunteers in connection with activity on behalf of the party’s nominees in a general election and voter drive activity on behalf of the party’s Presidential and Vice Presidential nominees. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used, including distribution by direct mail (mailings by a commercial vendor or from commercial lists); all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR §§100.87 and 100.147 and to the Campaign Guide for Party Committees.

Please clarify the nature of the transfer(s)-in and subsequent payments for the aforementioned disbursement(s). If the activity disclosed on your report does not meet the definition of “exempt” activity as described above, any portion of the expenditures made on behalf of specifically identified candidates must be disclosed on Schedule B, E or F supporting Line 23 or 30(b), 24 or 25 of the Detailed Summary Page as appropriate.

6. Schedule H3 of your report discloses “OREGON FEDERAL 1706 F-Key c/o Key Bank” as the name of account(s) for transfers received from an apparent non-federal account for shared activity. Please verify if these transfers were received from a non-federal account of your committee and amend your report with any clarifying information.

7. Schedule H4 of your report discloses reimbursements to individuals for “Food,” “Office supplies,” “Parking,” “Delivery” and “Shipping.” Please be advised that when itemizing 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

- Schedule B supporting Line 21(b) of your report discloses a payment(s) for “List Rental - OR GOP” and “List purchase--OR GOP” which appears to be disclosed on the wrong line of the Detailed Summary Page. Please be advised that Voter Identification, Generic Campaign and Get-out-the-vote

29030084668

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. 11 CFR §100.24 Please amend your report to properly disclose this activity on Line 30(b) or provide clarification regarding this activity.

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.

Sincerely,



Alexandra T. Broomhead
Campaign Finance Analyst
Reports Analysis Division

OREGON REPUBLICAN PARTY

Page 5

Excessive Contribution from a Committee

Contributor Name	Date	Amount	Report
Orrinpac	10/28/08	\$10,000	2008 30 Day Post-General

29030084670