



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

June 22, 2007

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

**Response Due Date:
July 23, 2007**

Identification Number: C00001305

Reference: May Monthly Report (4/01/07 – 4/30/07)

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. Schedule H1 of you 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.
2. Schedule H4 discloses 100% non-federal activity. Please be advised that by definition, this activity does not qualify as an expense(s) that can be allocated between your federal and non-federal accounts. If the disbursements were for operating expenditures paid for with 100% federal funds, they should be itemized on Schedule B for Line 21(b) of the Detailed Summary Page. If these expenses were permissibly paid for with 100% non-federal funds, they should not be disclosed on Schedule H4. Further, any reimbursement from your committee's non-federal account for any portion of this activity is not permissible and must be returned. 11 CFR §102.5(a)(1)(i) Please amend your report to clarify this discrepancy.
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

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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. Please amend your report to clarify this discrepancy.

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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