

January 8, 2010

Sylvette S. Garnes  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, DC 20463

RE: RFAI Dated December 4, 2009  
D C Republican Committee Federal

Ms. Garnes

You requested additional information regarding payments to the Committee from Republicans Abroad and Culver for Ward 2.

Republicans Abroad subleases space in the Committee's Washington DC offices and the payments reflected on the Committee's reports on Line 15 are appropriately reported as offsets to operating expenditures of the Committee. The sublease payments are the "usual and normal charge" for the space they occupy. The payment was determined pursuant to a sublease agreement as a percentage of the overall lease amount the Committee pays based on the space Republicans Abroad subleases from the Committee plus use of common utilities such as phone, fax, or internet.

The entry from Culver for Ward 2 was an inadvertent data entry error and should not have been reported in the Committee's federal account but rather on its state account reports. The mid-year report was amended on 12/23/2009 to reflect this correction.

Thank you,  
Scott Ward  
DCRC General Counsel

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