



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 22, 2012

WILLIAM LOGAN, TREASURER
MAINE REPUBLICAN PARTY
9 HIGGINS STREET
AUGUSTA, ME 04330

Response Due Date
06/26/2012

IDENTIFICATION NUMBER: C00003111

REFERENCE: YEAR-END REPORT (07/01/2011 - 12/31/2011)

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 **10** item(s):

1. Schedule D supporting Line 10 of your report discloses a debt(s) owed by your committee to "Fls Connect" with a negative closing balance(s). You are advised that any debt(s) with a negative closing balance requires further clarification. A negative closing balance suggests that you have either made a mathematical error or overpaid the debt which would result in the vendor incurring a debt owed to your committee and should be reported on Schedule D supporting Line 9 of your report.

Further, a credit from a vendor should be reported as a negative entry in the "amount incurred this period" field of the original debt and not as a separate debt transaction. In addition, credits from vendors require clarifying information to ensure that your committee did not receive a prohibited in-kind contribution per 11 CFR. §100.52 (d)(1). Please amend your report to clarify the nature of this transaction(s).

2. Your report discloses a payment(s) on Schedule D to "Fls Connect," which has not been recorded on a disbursement schedule. Loan payments must be reflected on a Schedule B as well as on Schedule C, and debt payments must be reflected on a Schedule B, E, F, H4 or H6 as well as on Schedule D. Please amend your report to clarify this discrepancy. (2 U.S.C. §434(b)(5)(D) and (b)(8))

3. Schedule D of your report itemizes debt owed to "Fls Connect" with an

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outstanding beginning balance(s) not included on your previous report. Please file an amendment to your report(s) to correct this discrepancy. (11 CFR § 104.11(b))

4. Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): "consulting." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

5. Please amend your report by providing the purpose for each disbursement itemized on Schedule(s) B and H4 supporting Line(s) 21(b) and 21(a). (11 CFR §§104.3(a)(4) and 104.10(4))

6. Schedule H4 supporting Line 21(a) of your report discloses a payment(s) for "banner advertising," "communications consulting," "direct mail," "mailer" and "reimbursement- posters," Please be advised that pursuant to 11 CFR §300.33(c)(1), expenditures for public communications (as defined by 11 CFR §100.26) that refer to a clearly identified candidate for Federal office and that promote, support, attack or oppose any such candidate for Federal office must not be allocated between or among federal and non-federal accounts. Only federal funds may be used.

Further, expenditures and disbursements for public communications that refer to a clearly identified candidate for Federal office and that promote, support, attack or oppose any candidate for Federal office, meet the definition of Federal Election Activity under 11 CFR §100.24 and should be disclosed on Schedule B for Line 30(b) along with the identity of the candidate(s). However, public communications that meet the definition of Federal Election Activity and that also contain express advocacy as defined under 11 CFR §100.22, but do not meet the conditions of exempt activity, would constitute an in-kind contribution, an independent expenditure or a coordinated party expenditure and should be properly disclosed on a Schedule B, E or F supporting Lines 23, 24 or 25, as appropriate, rather than on Schedule B for Line 30(b). Please amend your report to properly disclose this activity or provide clarifying information.

If this activity was categorized incorrectly, the Commission recommends that you immediately transfer the funds received by your federal account for this activity back to the non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

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7. Schedule H4 of your report discloses a reimbursement(s) to an individual(s) for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by committee staff that make up the reimbursement have to be itemized as memo entries regardless of the amount. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and an adequate purpose. 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 Opinion 1996-20, footnote 3)

8. Schedule H4 of your report discloses reimbursements to individuals for "reimbursement- posters." 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)

9. Please clarify all expenditures made for "polling" on Schedule(s) H4. 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)

10. Please clarify all expenditures made for "deposit for event" on Schedule H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E, or F supporting Lines 23, 24, or 25 and include the amount, name, address and office sought by each candidate. (11 CFR §§104.3(b) and 106.1)

Alternatively, if the payment(s) on Schedule H4 is associated with fundraising activity conducted for your committee's federal and non-federal accounts, it must be allocated according to the funds received method and the ratio reflected on Schedule H2. Further, it must be categorized as a fundraising activity on Schedule H4. Please provide clarifying information regarding the nature of this transaction(s) and amend your report(s) as appropriate.

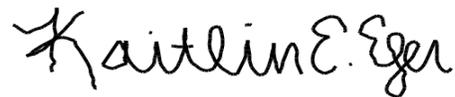
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Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action 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) 694-1143.

Sincerely,

A handwritten signature in black ink that reads "Kaitlin Eger". The signature is written in a cursive style with a large initial "K" and a distinct "E".

Kaitlin Eger
Senior Campaign Finance Analyst
Reports Analysis Division