RECEIVED PEC 147 CENTER

2003 DEC 16 AM 9: 32

December 09, 2008

Mr. David Butler Federal Election Commission 999 E Street, N.W. Washington, D.C. 20463

Re: Statement Of Organization For Napa County Republican Party.

Dear Mr. Butler:

First and foremost, please accept my apology for taking so long to respond to your letter of November 14, 2008. When I took on the job of Treasurer for the Napa County Republican Party, I had no idea that it was nearly a full time chore.

Apparently, when I filled out the initial Statement of Organization I was not conversant in the terminology used to define aspects of various types of committee status. Enclosed you will find an amended Statement Of Organization and copies of your letter to me.

Our Committee is a local county committee and is responsible for raising it's own operating funds. The only funds we might receive from the California Republican Party are the payments for registering voters, usually one dollar or so per name. Would you consider such payments as "contributions"?

The Napa Committee is not financed or otherwise controlled by the California Republican Party or any other national or state party or committee.

Sincerely,

Joseph Blevins, Treasurer

Napa County Republican Party

4166 Burgundy Way; P.O. Box 3263

Napa, CA 94558



November 14, 2008

Joseph Blevins, Treasurer Napa County Republican Party 4166 Burgundy Way, P.O. Box 3263 Napa, CA 94558-2501

Response Due Date: December 15, 2008

Identification Number: C00455659

Reference:

Statement of Organization, received 10/08/08

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 2 items:

- 1. On Line 5(d) of your Statement of Organization, it appears that your committee underlined the words "subordinate" and "Republican." In addition, you have indicated "County GOP Committee" on the form. Please be advised, a subordinate party committee is defined as the organization which, by virtue of the bylaws of a political party, is responsible for the day-to-day operation of such political party at the city, county, neighborhood, ward, district, or precinct level. 11 CFR §100.14(b) and (c) If your committee is in fact a subordinate committee of the California Republican Party/V8 Committee, please amend your Statement of Organization to indicate "SUB" and "REP" in the boxes provided on Line 5(d).
- 2. You have indicated "NONE" on Line 6 of your Statement of Organization which indicates that your committee is a local party committee that is not affiliated with the California Republican Party/V8 Committee. However, pursuant to 11 CFR §110.3(b)(3), all contributions made by political committees established, financed, maintained, or controlled by the State party committee and by subordinate State party committees shall be presumed to be made by one political committee.

This presumption shall not apply if the political unit in question has not received funds from any other political committee established, financed, maintained, or controlled by any party unit and the political committee of the party unit in question does not make contributions in cooperation, consultation or concert with, or at the request or suggestion of any other party unit or political committee established, financed, maintained, or controlled by another party unit. Further, 11 CFR §100.5(e)(4) defines a party committee as a political committee which represents a political party and is part of the official party structure at the national, State, or local level. Please clarify whether your committee is independent from the California Republican Party/V8 Committee per 11 CFR §110.3(b)(3) and if not, please amend Line 6 of your Statement of Organization to reflect this relationship as "affiliated."

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) 694-1162.

Sincerely,

David Butler

Campaign Finance Analyst Reports Analysis Division

FEC FORM 1

## STATEMENT OF ORGANIZATION



2000 DEC 16 AM 9: 32

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NAME OF     COMMITTEE (in full)	(Check if name is changed)		mple:If typing, type the lines.	12FE4M5			
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ADDRESS (number and street)	4166 Z	BURG	UNDY W	MY.		ı :	
: (Check if address is changed)	P.O. BOX 3263						
	NAP	<i>A</i>		CA	94558-2	501	
COMMITTEE'S E-MAIL ADDRES	s	CITY		STATE	ZIP CODE		
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COMMITTEE'S WEB PAGE ADD	RESS (URL)						
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COMMITTEE'S FAX NUMBER [7.07] - [2.26] - [3.76]	<u> </u>						
2. DATE 12 89	200						
3. FEC IDENTIFICATION NU	MBER	C 004	55459				
4. IS THIS STATEMENT	NEW (N) (	OR 🥳	AMENDED (A)				
I certify that I have examined this	s Statement and to th	e best of my	knowledge and belief i	t is true, correct	and complete.		
Type or Print Name of Treasurer	JOSEPI	4 BLE	ZWIV				
Signature of Treasurer	Joseph	Ble	und_	Date : 1.2	2 09 2	<b>20</b> 5	
NOTE: Submission of false, erronec	•		ject the person signing		the penalties of 2 U.S.	C. §437g.	
Office Use Only			For further information of Federal Election Commiss Toll Free 800-424-9530 Local 202-694-1100		FEC FORM (Revised 12/2007	1	

FEC Form 1 (Hevise	0 12/2007)		Page 3
Write or Type Committee Na	ame		
		• •	
5. Name of Any Connecte	d Organization, Affiliated Committee, Leadership	PAC Sponsor or Joint Fundra	ising Representative
1   1			i
<u> </u>			
Mailing Address			<del></del>
Maining Address		<del></del>	<del>-                                    </del>
		<u> </u>	. 1-1
. •	CITY	STATE	ZIP CODE
Relationship:	•		
Connected Organizat	on Affiliated Committee Leadership	PAC Sponsor Joint Fund	raising Representative
Custodian of Records: I books and records.	dentify by name, address (phone number optiona	I) and position of the person in	possession of committee
Full Name	ES. JANET KIRTLINK	•	<u> </u>
Mailing Address	2138 EUCLID A	V.C	
	NAPA		<u> </u>
	NAPA	CA 9	4558 -
	CITY	State	ZIP CODE
Title or Position		<b>7</b> 47.	
CHAIRMAN	Tel	lephone number 707	226 - 9374
Treasurer: List the name any designated agent (e.g	and address (phone number optional) of the trea assistant treasurer).	surer of the committee; and the	e name and address of
Full Name of Treasurer	SEPHIBLEVINS	<u></u>	<u></u>
Mailing Address	4166 BURGUND	Y WAY	<u> </u>
			·
	NAPA	LA 9	4.558 - [ ; ;
Title or Position	CITY	STATE	ZIP CODE
TREASUR	ZEZ Tel	ephone number 707	276 - 5820

	-	DMMITTEE
Candi	date	Committee:
(a)	: ]	This committee is a principal campaign committee. (Complete the candidate information below.)
(b)		This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
Name of Candida		
Candida Party A		Office State  n Sought: House Senate President District
(c)	7 1	This committee supports/opposes only one candidate, and is NOT an authorized committee.
Name o Candida		
Party	Com	mittee: COUNTY GOP COMMITTEE
(d)	-	(National, State (Democratic, This committee is a or subordinate) committee of the Republican, etc.) Party.
Politic	al Ac	etion Committee (PAC):
(e)		This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a
		Corporation Corporation w/o Capital Stock Labor Organization
•		Membership Organization Trade Association Cooperative
(f)		This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)
		In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)
Joint F	undr	raising Representative:
(g)		This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
(h) :	1 1	This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.
(	Comn	nittees Participating in Joint Fundraiser
	1.	FEC ID number C
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	4.	FEC ID number C
į	5.	FEC ID number C

CITY

STATE

ZIP CODE

NONE

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FEC Form 1 (Revised 12/2007)

Fuil Name of

Designated

## **Federal Election Commission ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS** The FEC added this page to the end of this filing to indicate how it was received. **Date of Receipt Hand Delivered Postmarked USPS First Class Mail** 12/10/08 Postmarked (R/C) **USPS** Registered/Certified Postmarked **USPS Priority Mail** Delivery Confirmation™ or Signature Confirmation™ Label **Postmarked USPS Express Mail** Postmark Illegible No Postmark **Shipping Date** Overnight Delivery Service (Specify): **Next Business Day Delivery Date of Receipt** Received from House Records & Registration Office **Date of Receipt** Received from Senate Public Records Office **Date of Receipt** Received from Electronic Filing Office **Date of Receipt or Postmarked** Other (Specify):