

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

April 15, 2015

JAMES JACQUETTE, TREASURER RHODE ISLAND REPUBLICAN STATE CENTRAL COMMITTEE 1800 POST ROAD SUITE 17-I WARWICK, RI 02886

Response Due Date 05/20/2015

IDENTIFICATION NUMBER: C00078196

REFERENCE: JULY QUARTERLY REPORT (04/01/2014 - 06/30/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 $\underline{6}$ item(s):

1. Schedule A supporting Line 11(b) of your report discloses apparent transfers from your non-federal account. Be advised that transfers from your non-federal account should only be disclosed on Schedule H3 supporting Line 18(a). Please amend your report to clarify this discrepancy. (11 CFR §§104.10 and 104.17)

2. Schedule H4 of your report discloses activity that appears to be both 100% federal and 100% non-federal. By definition, this activity(s) does not qualify as a shared expense to be allocated between your federal and non-federal accounts.

Please be advised that any activity which is financed entirely by the federal account should be reported on Schedule B supporting Line 21(b). 11 CFR § §104.3(b) and 104.9 Further, committees that make disbursements in connection with federal and non-federal elections and have established separate federal and non-federal accounts, must allocate their expenses pursuant to 11 CFR §§106.6 and 106.7. Please amend your report to disclose the federal payments on Schedule B supporting Line 21(b) and disclose the appropriate allocation amounts on Schedule H4 as MEMO entries with a detailed explanation.

The Commission recommends that you take steps to correct any

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non-compliance and that you establish procedures to ensure future compliance with the allocation regulations.

Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

3. On Schedule(s) H4 supporting Line(s) 21(a) of the Detailed Summary Page, you have not included the full name and/or mailing address for the payment made to "Aggragate Aggragate". Please amend your report accordingly. (11 CFR \$104.10(b)(4) and 104.17(b)(3))

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

5. Schedule H4 of your report discloses a reimbursement(s) to an individual(s) for the following apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500: "Travel Reimbursement."

When the reimbursement amount to an individual for travel and subsistence advances exceeds \$500, the payments by an individual 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)

6. Schedule H4 of your report discloses reimbursements to individuals for "Reimbursement for constant contact," "Reimbursement for Guillroy event," Reimbursement of exp," and "reimbursement open house." Please be advised that when itemizing reimbursements to individuals for goods or services, payment to the original vendors must be itemized as memo entries <u>regardless of amount</u>. 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)

Please note, you will not receive an additional notice from the Commission on this

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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) 694-1148.

Sincerely,

Quy Vuong Senior Campaign Finance Analyst Reports Analysis Division

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