



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 17, 2008

RQ-2

Joel Pate, Treasurer  
Republican Party of Florida  
420 E. Jefferson Street  
Tallahassee, FL 32301

Response Due Date:  
January 20, 2009

Identification Number: C00099259

Reference: February Monthly Report (1/1/08 – 1/31/08)

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 4 items:

1. Schedule D of your report discloses an apparent credit for a debt owed to Rosen Shingle Creek Golf Club. If a part of this debt has been forgiven, please be advised that Commission regulations (11 CFR Part 116) control the settlement of debts between political committees and their creditors. You should be aware that only terminating committees are permitted to settle debts. However, ongoing committees may request a determination from the Commission that a debt is not payable. 11 CFR §116.2(b)

If this represents resolution of a disputed debt, please note that until the creditor and committee resolve the dispute, the committee must disclose the amount the committee admits it owes, the amount the creditor claims is owed, and any amount the committee has paid the creditor. 11 CFR §116.10(a). Please provide further clarification regarding this apparent credit.

2. Schedule H4 discloses a disbursement(s) which is categorized as a fundraising expense(s); however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the direct costs of each fundraising event in which the committee collects both federal and non-federal funds. The costs are allocated according to the funds received ratio and reported on Schedule H2. 11 CFR §§106.6(d) and

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106.7(d)(4). Please file a Schedule H2 to disclose the ratio for the fundraising event(s).

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

4. Schedule H4 of your report discloses reimbursements to individuals for "office supplies" and "utilities." 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

**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) 694-1393.

Sincerely,



Sylvette S. Garnes  
Campaign Finance Analyst  
Reports Analysis Division