



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 18, 2015

ROBERT CHRISTOPHER ROSENTHAL, TREASURER  
MARYLAND REPUBLICAN STATE CENTRAL  
COMMITTEE  
P.O. BOX 631  
ANNAPOLIS, MD 21404

**Response Due Date**  
**04/22/2015**

IDENTIFICATION NUMBER: C00120055

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2014 - 09/30/2014)

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 1 item(s):

**1.** Schedule H4 supporting Line 21(a) of your report discloses a payment(s) for "SALARY-EXECUTIVE DIRECTOR," "SALARY-FINANCE DIRECTOR," "SALARY-BUSINESS MANAGER," "SALARY - STAFF," "RETIREMENT EXPENSES," and "PAYROLL TAXES EXPENSE." Please be advised that pursuant to 11 CFR §300.33(c)(2), salaries and wages for employees who spend more than 25% of their compensated time in a given month on Federal Election Activity (FEA) or activities in connection with a Federal election must not be allocated between or among federal and non-federal accounts. Rather, only federal funds may be used. Further, the Commission concluded in Advisory Opinion 2003-11 that amounts spent for employee-specific "fringe benefits," consisting of health insurance, disability insurance, life insurance, retirement benefits and payroll taxes, fall into the category of compensated time.

Please clarify whether this activity is for employees who spent 25% or less of their time during the month(s) referenced above on FEA or activities in connection with a Federal election. If this is not the case, any reimbursement from your committee's non-federal account for this payment is not permissible and must be returned. Although the Commission may take further legal action regarding any improper allocation activity, your prompt action will be taken into consideration.

MARYLAND REPUBLICAN STATE CENTRAL COMMITTEE

Page 2 of 2

- Schedule H4 discloses disbursements for the Administrative category which use a ratio that is inconsistent with the ratio disclosed on Schedule H1. For your information and consideration when preparing future filings, please be advised that the fixed ratio for the allocation of administrative, generic voter drive and exempt activity expenses by State, district and local party committees should be the same for the full two-year election cycle, unless a Special election is scheduled during an odd numbered year.

**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) 694-1176.

Sincerely,



Arman Tarzi  
Senior Campaign Finance Analyst  
Reports Analysis Division