



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 14, 2007

Mark Tondreau, Treasurer
Rhode Island Republican State Central Committee
413 Knight Street, Unit 101
Warwick, RI 02886

Response Due Date:
April 13, 2007

Identification Number: C00078196

Reference: Amended October Monthly Report (9/1/06-9/30/06), received 10/20/06

Dear Mr. Tondreau:

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. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule A of your Amended August Monthly (7/1/06-7/31/06), received 1/3/07, September Monthly (8/1/06-8/31/06), and Amended October Monthly (9/1/06-9/30/06), received 10/20/06 Reports combined discloses transfers totaling \$32,232.49 from the Chaffee Rhode Island Victory Committee, which is a joint fundraising committee affiliated with your committee. The sum of the entries itemized on the memo Schedule A, however, total only \$29,025.00.

Please be advised that a memo Schedule A must be provided to itemize your committee's share of the gross contributions received through the joint fundraiser. The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the calendar year, and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount. 11 CFR §102.17(c)(8)(i)(B) Please clarify this discrepancy.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to check the appropriate allocated activity or event category box for the payment(s) made to "Johnston Consulting, Inc." Please amend your report to disclose the appropriate category.

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-Please amend your report by providing the purpose and address for each disbursement itemized on Schedule(s) B and H4 supporting Line(s) 21(b) and 21(a).

-Your Amended August Monthly (7/1/06-7/31/06), received 1/3/07, September Monthly (8/1/06-8/31/06), and Amended October Monthly (9/1/06-9/30/06), received 10/20/06 Reports combined discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Each state, district or local party committee utilizing separate federal and non-federal accounts is required to allocate any administrative expenses (excluding salary) between the accounts according to a fixed percentage selected on Schedule H1. A Schedule H1 must be filed with the first FEC FORM 3X filed at the beginning of each calendar year. Payments for salary and wages for employees who spend more than 25% of their compensated time on Federal election activities or on activities in connection with a Federal election must be made from a federal account and disclosed on a Schedule B supporting Line 30(b) of the Detailed Summary Page. 11 CFR §106.7

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be provided during each two year election cycle beginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

-Schedule B of your report discloses reimbursements to individuals for "Cell phone allowance." Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, a memo entry including 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 B, which reimbursement each memo entry relates to. If itemization is not necessary, you must indicate so in an amendment to

this report. 11 CFR §104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3

-Please clarify all expenditures made for "Catering" on Schedule B. 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, 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. 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.

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- 1140.

Sincerely,



Nisha Saspal
Campaign Finance Analyst
Reports Analysis Division

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