



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

February 11, 2015

ROBERT BALINK, TREASURER
COLORADO REPUBLICAN COMMITTEE
5950 S. WILLOW DRIVE SUITE 302
GREENWOOD VILLAGE, CO 80111

Response Due Date
03/18/2015

IDENTIFICATION NUMBER: C00033134

REFERENCE: 30 DAY POST-GENERAL REPORT (10/16/2014 - 11/24/2014)

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 6 item(s):

1. Schedule A supporting Line 11(a)(i) of your report discloses \$6,666.66 in activity identified as MEMO entries that do not appear to correspond with any itemized transaction(s). Please be advised, a memo entry is used to disclose additional information about an itemized transaction and the amount of a memo entry is not included in the total receipts or disbursements for the report. Please amend your report to provide clarifying information regarding this activity. (11 C.F.R. § 104.3(a) and (b))
2. Schedule A, supporting Line 12 of your report discloses transfers, totaling \$486,585.91 from "Coffman Victory Fund," "Gardner Victory Committee" and "Targeted State Victory", that appear to be received through joint fundraising efforts. However, "Coffman Victory Fund," "Gardner Victory Committee" and "Targeted State Victory", is not disclosed as a joint fundraising representative(s) on your Statement of Organization. Please amend your Statement of Organization to disclose the joint fundraising representative or amend your report to provide clarifying information. (11 CFR §102.2)
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): "Aurora Office: Field Expenses," "Consulting," "Denver Field Office," "Event Expenses," "Event Fees," "Jeffco Field Office," "Mesa Field Office," "Pueblo Field Office," "Referral" and

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"Weld Field Office." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

4. Schedule B supporting Line 30(b) of your report discloses a payment(s) for "Direct Mailer," "Television spots" and "TV media buy" which is categorized as Federal Election Activity and therefore, may require the disclosure of the candidate(s) this activity should be attributed to. Expenditures and disbursements for public communications that refer to a clearly identified candidate for Federal office and that promote, support, attack or oppose any candidate for Federal office, meet the definition of Federal Election Activity under 11 CFR §100.24 and should be disclosed on Schedule B for Line 30(b) along with the identity of the candidate(s).

Further, please be advised that public communications that meet the definition of Federal Election Activity and that also contain express advocacy as defined under 11 CFR §100.22, but do not meet the conditions of exempt activity, would constitute an in-kind contribution, an independent expenditure or a coordinated party expenditure and should be properly disclosed on a Schedule B, E or F supporting Lines 23, 24 or 25, as appropriate rather than on Schedule B for Line 30(b). Please clarify if this activity meets the definition of Federal Election Activity or if it contains express advocacy and amend your report to properly disclose this activity, if necessary.

5. Schedule B of your report discloses reimbursements to individuals for "Aurora Office: Office Reimbursment," "Boulder Office: Reimbursements," "Coalition Reimbursement," "Denver Field Office Reimbursements," "Greenwod Village: Office Reimbursment," "Mesa Field Office Equipment," "Mesa Office Printing," "Reimbursement," "Travel Reimbursement / **Rallys**" and "Travel / **Phone Reimbursement**." Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in \$200 or more 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 §300.36(b), and Advisory Opinions 1992-1 and 1996-20, footnote 3)

6. Schedule B discloses a reimbursement(s) to an individual(s) for "Adams Office: Travel Reimbursement," "Northern Colo Office: Travel Reimbursment," "Travel Reimbursement" and "**Travel Reimbursement** /

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Rallys." When the reimbursement amount to an individual for travel and subsistence advances exceeds \$500, the payments by individuals that make up the reimbursement may have to be itemized. For example, if the related payment(s) to any one vendor by an individual aggregates \$200 or more for the calendar year, the payment(s) must be itemized as a memo entry for that reimbursement. 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 B, which reimbursement each memo entry relates to. If itemization is not necessary for a particular reimbursement to an individual in excess of \$500, you must clarify this in an amendment to this report. (11 CFR §300.36(b) and Advisory Opinion 1996-20, footnote 3)

- Your report discloses certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. For your information and consideration when preparing future filings, transfers from affiliated/other party committees, including transfers from joint fundraising representatives, should be properly disclosed on a separate Schedule(s) A, supporting Line(s) 12 of the Detailed Summary Page. Contributions from other political committees should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page. Contributions from individuals, including contributions from tribes, should be properly disclosed on Schedule A, supporting Line 11(a) of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (52 U.S.C. §30104(b) (formerly 2 U.S.C §434(b)) and FORM 3X Instructions)

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.**

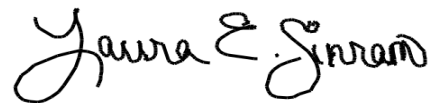
Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the

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Reports Analysis Division) or my local number (202) 694-1157.

Sincerely,

A handwritten signature in black ink that reads "Laura E. Sinram". The signature is written in a cursive style with a large initial 'L' and a distinct 'E'.

Laura Sinram
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division