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March 20, 2008

Brian Bennett Campaign Finance Analyst Reports Analysis Division Federal Election Commission Washington, DC 20463

Identification Number: C00441899

Reference: FEC letter of February 13, 2008 (remailed March 4, 2008)

Dear Mr. Bennett:

This firm is local counsel for the Trumbull County Republican Party and its Central Committee. I have reviewed your letter of February 13, 2008 and the local party's submission of January 16, 2008.

The Central Committee is the elected governing body of the Trumbull County Republican Party. The Trumbull County Republican Party is, in turn, a subordinate of the Ohio Republican Party. The presumption contained in the first paragraph of your letter is correct. As such, we are not independent from the Ohio Republican Party.

With respect to the application of this presumption (as outlined in paragraph two of your letter), the central committee of the Trumbull County Republican Party is composed of elected precinct committee-people and appointed members (usually replace members who move or resign). Appointed members are selected by the central committee members. 'The central committee is the operating arm of the local party organization under the auspices of the State party. Further, the local party and its central committee does not receive funds nor make contributions in cooperation, consultation or concert with, or at the request or suggestion of any other party unit or political committee established, financed, maintained, or controlled by another party unit.

The impetus for registering with the Federal Election Commission was the local party's sincere effort to comply with the Federal Election laws. If this firm and the local party can be of further assistance to you and the FEC, please advise.

Very truly yours,

Copy to: Craig Bonar, Chairman

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