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FEDERAL ELECTION COMMISSION

2017 MAR -3 PM 12:33

Jeff S. Jordan, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

CELA

Attn: Mary Beth deBeau, Paralegal
Office of Complaints Examination
And Legal Administration
CELA@fec.gov

March 3, 2017

**Re: MUR #7214; Response of the Ohio Republican Party State
Central & Executive Committee**

Dear Mr. Jordan,

The Ohio Republican Party State Central & Executive Committee ("ORP") respectfully urges the Federal Election Commission ("the Commission") to summarily dismiss the above referenced matter. The Ohio Democratic Party ("ODP") alleges that the ORP improperly paid for software from a company, FactGem as an administrative cost instead of paying for it as federal election activity ("FEA"). The ODP's allegation is wholly unsupported and its legal arguments are meritless.

Moreover, the ODP already raised nearly identical issues over two years ago in a very similar complaint it filed before the Ohio Elections Commission ("OEC"). In the 2014 Ohio case, the ODP relied upon the same newspaper article it attaches to the instant complaint and similarly argued that payment to FactGem was not an appropriate administrative expense under Ohio law. The OEC examined a similar statutory scheme as is presented to this Commission, found no violation, and dismissed the ODP's case.

It is unclear why, over two years later, the ODP has resurrected its ill-fated claim in a different forum. The ODP makes no new arguments (other than citing the federal law counterparts to Ohio's statutes this time) and presents no new evidence. Accordingly, we urge the Commission to find that the ORP has not violated the Federal Elections Campaign Act ("FECA") or its accompanying regulations.

A. The ORP properly paid FactGem for software as an administration cost.

On the basis of a 2014 newspaper article alone, the ODP alleges that the ORP improperly paid FactGem for a software license as an administrative cost. The ODP's argument is flawed from both a factual and a legal perspective.

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Response: MUR #7214
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The facts alleged by ODP in its Complaint to this Commission are based on a 2-year-old newspaper article from which the ODP makes a series of erroneous presumptions. First, without explanation or further factual support, the ODP presumes that all products sold by FactGem related to the single topic of the newspaper article: Project Ruby. This is simply not the case. FactGem provided various types of products that were paid for (and reported) in various ways. The article itself mentions multiple stages of Project Ruby and other products (such as CanvassR) that FactGem offers.

The ODP's own Complaint highlights the fallacy of its presumptions. The ODP notes that "the ORP also made additional payments directly to FactGem from non-federal accounts" such as the Building Trust Fund, the Restricted Account or the State Account. The ORP submits, as it did to the OEC two years ago, that these expenditures for FactGem were appropriate under Ohio law because the ORP was purchasing different products for different purposes. The ODP's Exhibit C (as it was provided to the ORP) does not reflect the campaign finance reports of these funds as the ODP claims, but still demonstrates the point: payments were made based on the reasons for the purchases, and not on the name of the vendor. The ODP's allegations regarding other Ohio accounts are not only outside of this Commission's jurisdiction, but they have been examined and rejected by the OEC in an earlier proceeding, as set forth in the next section.

The ODP's argument is also legally flawed. The ODP variously argues that Project Ruby is FEA therefore every product sold by the vendor that created Project Ruby must also be FEA. FEA is defined, in relevant part, as voter identification, generic campaign activity and get-out-the-vote activity when these activities are conducted in connection with an election in which a candidate for federal office appears on the ballot. 11 CFR 100.24. The ODP's erroneous presumption that all purchases from FactGem were for Project Ruby "voter identification" activity is not only factually unsupported, but it overlooks 11 CFR 106.7(c)(2). This Commission's regulations specifically permit the ORP to pay administrative costs, including office supplies, as an allocated expense between its Federal and non-Federal accounts. 11 CFR 106.7(c)(2).

There is no dispute that ORP paid FactGem for computer software, as well as other goods and services, as an "administrative cost." These expenditures are reported on ORP's Schedule H4 Report to the Commission which describes the purpose of the disbursement of funds for FactGem as "software purchase/license-not candidate specific." Complaint Exhibit B. As noted in the Complaint, the ORP similarly and consistently reported these allocation expenditures to the Ohio Secretary of State on reports filed with that state office regarding ORP state accounts.

The ODP next argues that the allocation payments were improper and that only Federal or Levin funds could be used. But this Commission has previously examined the ORP's allocation methods and specifically approved the ORP's use of an ORP state account to pay for allocated administrative expenses. AO 1993-21. The ORP's allocation mechanisms are consistent with that 1993 guidance as the ODP's own Exhibits to its complaint show.

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ORP paid FactGem as an administrative expense because ORP purchased a software license as office supplies, precisely as permitted by federal law and precisely as reported to this Commission. The ODP's argument is equivalent to saying that a political party is prohibited from paying for a Microsoft Office license as an administrative expense or that, because a political party once bought paper at Staples and paid for it as FEA, every subsequent purchase from Staples must be FEA. Voter identification activity is specifically defined as "obtaining voter lists and creating or enhancing voter lists by verifying or adding information about the voters' likelihood of voting in an upcoming election or their likelihood of voting for specific candidates." 11 CFR 100.24(a)(4).

The expenditures that the ODP complains of do not meet the definition (or even the spirit) of "voter identification activity." Rather, the purchase of a "software/license - not candidate specific" falls squarely under the definition of an "administrative cost" as set forth in 11 CFR 106.7(c)(2). The purchase of the software license from FactGem constituted an appropriate administrative cost that was paid for by the ORP precisely as required by federal law and this Commission's regulations. A computer software license is, simply put, a permissible office supply that was paid for through the allocation formula set forth in 11 CFR 106.7(b).

B. The ORP's challenge as to state funds is misplaced and has already been settled.

The ODP's allegations regarding FactGem and the various ORP state accounts are puzzling, but they are not new. On October 31, 2014, ODP General Counsel, N. Zachary West, (the same N. Zachary West who filed the instant Complaint) filed a very similar complaint before the OEC. In that complaint, which is attached here as Exhibit 1, Mr. West based his entire case on the same newspaper article and maintained that the ORP improperly paid for FactGem with funds that could not be used for candidate support in violation of state law. Exhibit 1, ¶15. Mr. West even gratuitously added that the FactGem expenditure "may constitute a violation of federal regulations such as 11 CFR §100.25, which requires voter identification activities to be paid for either with purely federal dollars or a mix of federal and Levin funds, but that is outside the Ohio Elections Commission's jurisdiction." *Id.*

Indeed, the OEC did not opine on the federal issues that Mr. West raised, but it did consider Mr. West's allegations regarding FactGem:

On 12/18/2014 after careful consideration of the evidence, the Ohio Elections Commission adopted the following finding(s) in the above-referenced matter:

THE COMMISSION FOUND NO VIOLATION AND DISMISSED THE COMPLAINT.

See Order of the Ohio Elections Commission in *West v. Ohio Republican Party et al.*, Case No. 2014G-046, attached as Exhibit 2.

Bricker & Eckler
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Response: MUR #7214
March 3, 2017
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Although not binding on this Commission, the OEC's determination is illustrative because not only are the facts virtually identical, but the federal regulations and state law involved mirror each other.

Just as the ODP omitted any reference to 11 CFR 106.7(c)(2) in the instant matter, Mr. West similarly omitted the critical Ohio provision from his complaint to the OEC. Ohio law similarly provides that the Ohio Political Party Fund (the fund at issue in the 2014 West complaint) could specifically be used for "defraying of operating and maintenance costs associated with political party headquarters, including ... office equipment and supplies, postage, and the purchase, lease, or maintenance of computer hardware or software." O.R.C. 3517.18 (A)(1). The ORP maintained, and the OEC agreed, that the exact same payments to FactGem for software that the ODP challenges in the instant matter were appropriately categorized as "operating and maintenance costs" for purposes of Ohio law, thus could be paid from a fund which could only be use for non-candidate specific functions.

The ORP maintains that this Commission should reach a similar result. A side-by-side comparison of relevant state laws and federal regulations highlights the similarities:

	State	Federal
General Restrictions on use of Funds:	Ohio Political Party Funds may only be expended for specific purposes.	Non-federal funds may not be used for FEA, as defined in 11 CFR 100.24.
Allowance for administrative costs:	Ohio Political Party Funds may be used for "defraying of operating and maintenance costs associated with political party headquarters, including rental or leasing costs, staffing salaries, office equipment and supplies, postage, and the purchase, lease or maintenance of computer, hardware and software." O.R.C. 3517.18(A)(1)	State parties may allocate "administrative costs" that include "rent, utilities, office equipment, postage for other than mass mailings, and routine building maintenance upkeep and repair..." 11 CFR 106.7(c)(2)
Limitation on use of administrative costs:	Cannot "further the election or defeat any particular candidate or to influence directly the outcome of any candidate or issue election." O.R.C. 3517.18(B)(1)(a)	Cannot be "directly attributable to a clearly identified Federal candidate..." 11 CFR 106.7(c)(2)

The ORP's allocation methods are appropriate (AO 1993-21) and its allocation of expenses for the purchase of a software license was similarly appropriate as an administrative expense.

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March 3, 2017

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C. Conclusion

ORP properly and lawfully paid FactGem for a computer software license and allocated that expenditure as it was required to do pursuant to federal law. 11 CFR 106.7(c)(2); 11 CFR 300.33(a)(2). In accordance with the foregoing, the ORP respectfully requests that the Commission finds that there is no reason to believe that ORP violated FECA or its accompanying regulations.

Sincerely,



Maria J. Armstrong



Amanda M. Grandjean



Ohio Elections Commission

21 West Broad Street, Suite 600
Columbus, Ohio 43215
614-466-3205
www.state.oh.us/elc

Degee Wilhelm
Chairman

Helen E. Balcolm
Vice-Chair

Kimberly G. Allison

Terrance J. Courroy

Lynn A. Grimsbaw

Jayme P. Smoot

William L. Vasil

Phillip C. Richter
Executive Director

Fax: (614) 728-9408

November 3, 2014

Case No. 2014G-046
West v. Ohio Republican Party, et al.

To: Ohio Republican Party, Matt Borges, Chair

The Ohio Elections Commission has received a complaint alleging violations of election law pursuant to the Ohio Revised Code:

§3517.17 (IMPROPER USE OF CHECK-OFF FUNDS)
§3517.18 (IMPROPER USE OF CHECK-OFF-FUNDS)

This case has been scheduled for preliminary review at 10:00 A.M. on December 18, 2014, in the office of the Ohio Elections Commission located on the 6th floor of the Wyandotte Building at 21 W. Broad St., Suite 600, Columbus, Ohio 43215.

The Commission requests that you file a written response to the allegations as soon as possible explaining in full the reason(s) for the violation(s) or the basis for your belief contrary to the allegations. The response must be properly notarized. A proper notarization includes a statement above the notary public's signature that the document was sworn to and subscribed in the presence of the notary public and the date on which it was notarized. A statement of counsel would also be sufficient.

At the preliminary review, the Commission will review all timely filed documents submitted. After reviewing the documents, the Commission may do one of the following:

1. Find there has been no violation;
2. Find there has been a violation; or
3. Set the matter for a hearing at a later date if the Commission desires to receive further testimony.

Following the preliminary review, the commission will notify you of the disposition.

You are welcome to attend and observe the preliminary review, however, it is within the discretion of the Commission to allow any statements or presentation of any evidence at that time.

Sincerely,
Philip C. Richter
Executive Director

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IN THE OHIO ELECTIONS COMMISSION

N. ZACHARY WEST
340 East Fulton Street
Columbus, OH 43215

Complainant,

vs.

OHIO REPUBLICAN PARTY
MATT BORGES, CHAIR
211 South Fifth Street
Columbus, OH 43215

Respondent.

CASE NO. 2014G-046

EXHIBIT: A

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OCT 31 2014

OHIO ELECTIONS COMMISSION

COMPLAINT

State of Ohio :
County of Franklin : SS.

N. Zachary West, being first duly sworn, deposes and says as follows:

1. I am registered Ohio elector and make the following complaint based upon personal knowledge.

Parties

2. Complainant, N. Zachary West, is General Counsel for the Ohio Democratic Party.
3. Respondent, Ohio Republican Party, is a major political party in the State of Ohio and is entitled to receive and does receive Ohio Political Party Fund monies pursuant to R.C. 3517.17. These funds are deposited into the Ohio Republican State Central & Executive Committee Restricted Fund. Respondent has total control over the Ohio Republican State Central & Executive Committee Restricted Fund.

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4. In addition to the Restricted Fund, Respondent operates various other accounts, including a federal campaign account registered with the FEC used to fund federal election activity for the purpose of influencing the outcome of candidate elections. Respondent uses this account to pay for mail on behalf of federal candidates and get-out-the-vote activities for specific elections.

Respondent has Transferred Ohio Political Party Fund Money to Accounts Used to Influence the Outcome of Candidate Elections.

5. On April 11, 2014, the Ohio Republican State Central & Executive Committee Restricted Fund transferred \$7,213.38 to the Ohio Republican Party Federal Account. The purpose of the transfer was "ALLOCATION OF STATE SHARE UTILITY BILLS." This transfer was reported on the Ohio Republican State Central & Executive Committee Restricted Fund's semiannual report. Exhibit A.

6. On April 29, 2014, the Ohio Republican State Central & Executive Committee Restricted Fund transferred \$20,000 to the Ohio Republican Party Federal Account. The purpose of the transfer was "ALLOCATION OF STATE SHARE ADMIN EXPENSES." This transfer was reported on the Ohio Republican State Central & Executive Committee Restricted Fund's semiannual report. Exhibit A.

7. On May 1, 2014, the Ohio Republican State Central & Executive Committee Restricted Fund transferred \$15,000 to the Ohio Republican Party Federal Account. The purpose of this transfer was "ALLOCATION STATE SHARE SOFTWARE EXPENSES." This transfer was reported on the Ohio Republican State Central & Executive Committee Restricted Fund's semiannual report. Exhibit A.

8. This constitutes a violation of R.C. 3518.18. Respondent are aware of this prohibition, as they were specifically mentioned in the AO 89ELC-06, in which this commission interpreted

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voters can be 'moved' to support Republicans based on that information, decide how to allocate resources to move those voters, and track them to make sure they vote." Exhibit D.

14. The database, referred to as Project Ruby, is intended not only to influence candidate elections in 2014, but also to assist John Kasich in a potential presidential run in 2016. *Id.* The primary intent of the software is to influence the outcome of candidate elections.

15. The use of Ohio Political Party Fund monies to pay for Project Ruby constitutes a violation of R.C. § 3517.18(B)(1)(a). It also may constitute a violation of federal regulations such as 11 CFR §100.25, which require voter identification activities to be paid for either with purely federal dollars or with a mix of federal and Levin funds, but that is outside the Ohio Elections Commission's jurisdiction. However, this commission may wish to refer the matter to the appropriate agencies for investigation and prosecution.

WHEREFORE, Complainant requests that this matter be fully investigated, that respondents be found in violation of R.C. 3517.18, and that Respondents be appropriately sanctioned.

Further Affiant sayeth nought.

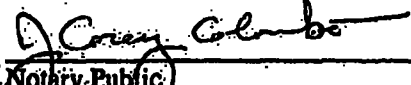


N. Zachary West.

Sworn to before me and subscribed in my presence, this 31 day of October, 2014.



JOHN COREY COLOMBO
Attorney at Law
Notary Public, State of Ohio
My Commission Has No Expiration
Section 147.03 R.C.



Notary Public

11-11-14 14:44:00

Exhibit A

Ohio Secretary of State Campaign Finance Disclosure



Expenditures

Name	Item Description	Address	Report Type	Year	Expense Date	Amount	Event Date	Payee	Committee Name
WYRICK WILLIAM		% ORP 211 B 5TH ST COLUMBUS OH 43215	SEMIANNUAL (JULY)	2014	03/28/2014	\$1,222.11		PAYROLL & TAXES BUILDING MANAGER	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
WYRICK WILLIAM		% ORP 211 B 5TH ST COLUMBUS OH 43215	SEMIANNUAL (JULY)	2014	04/16/2014	\$1,221.78		PAYROLL & TAXES BUILDING MANAGER	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	ADVANCE PRINTING & GRAPHICS	1348 DELASHMUT AVE COLUMBUS OH 43212	SEMIANNUAL (JULY)	2014	03/28/2014	\$1,391.77		INVITES	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	AT&T - FAX	PO BOX 8100 ALBORA L 46007	SEMIANNUAL (JULY)	2014	03/28/2014	\$658.87		FAX LINE	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	AT&T - ROUTER	PO BOX 8018 CAROL STREAM IL 60187	SEMIANNUAL (JULY)	2014	03/28/2014	\$488.56		ROUTER	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	AT&T MOBILITY	PO BOX 6483 CAROL STREAM IL 60187-6483	SEMIANNUAL (JULY)	2014	03/28/2014	\$861.94		CELL PHONES	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	CAPITAL SQUARE PRINTING	59 E GAY ST COLUMBUS OH 43215	SEMIANNUAL (JULY)	2014	06/07/2014	\$620.30		PRINTING	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	CITY WIDE MAINTENANCE OF COLUMBUS	6413 E LIVINGSTON AVE STE E REYNOLDSBURG OH 43068	SEMIANNUAL (JULY)	2014	03/28/2014	\$780.21		JANITORIAL SERVICE	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	FACTGEM	3000 ALBURN DRIVE SUITE 200 BEACHWOOD OH 44122	SEMIANNUAL (JULY)	2014	03/11/2014	\$10,000.00		COMPUTER SOFTWARE	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	FACTGEM	2800 ALBURN DRIVE SUITE 300 BEACHWOOD OH 44122	SEMIANNUAL (JULY)	2014	03/28/2014	\$10,000.00		COMPUTER SOFTWARE	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	HANOVER BURFANCE COMPANY	PO BOX 590045 CHARLOTTE NC 28251-0045	SEMIANNUAL (JULY)	2014	03/28/2014	\$2,248.00		INSURANCE PREMIUM	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	HUNTINGTON NATIONAL BANK	440 POLARIS PARKWAY WESTERVILLE OH 43082	SEMIANNUAL (JULY)	2014	03/16/2014	\$15.00		BANK FEES	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	HUNTINGTON NATIONAL BANK	440 POLARIS PARKWAY WESTERVILLE OH 43082	SEMIANNUAL (JULY)	2014	03/17/2014	\$20.34		BANK FEES	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	HUNTINGTON NATIONAL BANK	440 POLARIS PARKWAY	SEMIANNUAL (JULY)	2014	02/17/2014	\$20.00		BANK FEES	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND

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Name	Item Individual	Address	Report Type	Year	Expended Date	Amount	Event Date	Purpose	Committee Name
		WESTERVILLE OH 43082							COMMITTEE RESTRICTED FUND
	HUNTINGTON NATIONAL BANK	440 POLARIS PARKWAY WESTERVILLE OH 43082	SEMIANNUAL (JULY)	2014	01/15/2014	\$15.00		BANK FEES	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	HUNTINGTON NATIONAL BANK	440 POLARIS PARKWAY WESTERVILLE OH 43082	SEMIANNUAL (JULY)	2014	04/16/2014	\$15.00		BANK FEES	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	HUNTINGTON NATIONAL BANK	440 POLARIS PARKWAY WESTERVILLE OH 43082	SEMIANNUAL (JULY)	2014	01/17/2014	\$20.00		BANK FEES	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	HUNTINGTON NATIONAL BANK	440 POLARIS PARKWAY WESTERVILLE OH 43082	SEMIANNUAL (JULY)	2014	04/17/2014	\$23.50		BANK FEES	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	HUNTINGTON NATIONAL BANK	440 POLARIS PARKWAY WESTERVILLE OH 43082	SEMIANNUAL (JULY)	2014	05/16/2014	\$15.00		BANK FEES	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	HUNTINGTON NATIONAL BANK	440 POLARIS PARKWAY WESTERVILLE OH 43082	SEMIANNUAL (JULY)	2014	05/17/2014	\$2.52		BANK FEES	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	HUNTINGTON NATIONAL BANK	440 POLARIS PARKWAY WESTERVILLE OH 43082	SEMIANNUAL (JULY)	2014	02/16/2014	\$15.84		BANK FEES	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	HUNTINGTON NATIONAL BANK	440 POLARIS PARKWAY WESTERVILLE OH 43082	SEMIANNUAL (JULY)	2014	05/16/2014	\$15.84		BANK FEES	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	LEXISNEXIS	PO BOX 2314 CAROL STREAM IL 60132-2314	SEMIANNUAL (JULY)	2014	03/28/2014	\$612.20		INTERNET SEARCH ENGINE	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	MAIL FINANCE	PO BOX 45840 SAN FRANCISCO CA 94145	SEMIANNUAL (JULY)	2014	03/28/2014	\$2,500.00		OFFICE EQUIPMENT LEASE	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	MORNINGSTAR OF DOWNTOWN	57 E CHESTNUT ST COLUMBUS OH 43215	SEMIANNUAL (JULY)	2014	03/28/2014	\$183.08		STORAGE RENTAL	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	OHIO REPUBLICAN PARTY FEDERAL ACCOUNT	211 S FIFTH STREET COLUMBUS OH 43215	SEMIANNUAL (JULY)	2014	05/01/2014	\$15,000.00		ALLOCATION STATE SHARE SOFTWARE EXPENSES	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	OHIO REPUBLICAN PARTY FEDERAL ACCOUNT	211 S FIFTH STREET COLUMBUS OH 43215	SEMIANNUAL (JULY)	2014	04/11/2014	\$7,213.38		ALLOCATION OF STATE SHARE UTILITY BILLS	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	OHIO REPUBLICAN PARTY FEDERAL ACCOUNT	211 S FIFTH STREET COLUMBUS OH 43215	SEMIANNUAL (JULY)	2014	04/28/2014	\$20,000.00		ALLOCATION OF STATE SHARE ADMIN EXPENSES	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	RENAISSANCE COLUMBUS	60 N THIRD ST COLUMBUS OH 43215	SEMIANNUAL (JULY)	2014	05/05/2014	\$11,000.00		FOOD SERVICE FUNDRAISER	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	ROYAL DOCUMENT DESTRUCTION	980-D CLAYCRAFT ROAD GAYHANA OH 43220	SEMIANNUAL (JULY)	2014	02/26/2014	\$50.00		DOCUMENT DESTRUCTION	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	STANDARD PARKING	250 WEST STREET.	SEMIANNUAL	2014	03/28/2014	\$250.00		PARKING	OHIO REPUBLICAN STATE

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Money	Non Individual	Address	Report Type	Year	Expense Date	Amount	Event Date	Purpose	Committee Name
		SUITE 450 COLUMBUS OH 43215	(JULY)						CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND
	US POSTAL SERVICE	4588 SAWYER RD COLUMBUS OH 43228	SEMIANNUAL (JULY)	2014	04/02/2014	\$2,048.00		POSTAGE	OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS For Other Than An Authorized Committee

EXHIBIT B

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT Example: If typing, type over the lines. 12FE4M5

OHIO REPUBLICAN PARTY STATE CENTRAL & EXECUTIVE COMMITTEE

ADDRESS (number and street) 211 S. Fifth Street

Check if different than previously reported. (ACC) Columbus OH 43215

2. FEC IDENTIFICATION NUMBER CITY STATE ZIP CODE

C00162339

3. IS THIS REPORT NEW OR AMENDED (N) (A)

4. TYPE OF REPORT (Choose One) (a) Quarterly Reports: April 15 Quarterly Report (Q1) July 15 Quarterly Report (Q2) October 15 Quarterly Report (Q3) January 31 Year-End Report (YE) July 31 Mid-Year Report (Non-election Year Only) (MY) Termination Report (TER)

(b) Monthly Report Due On: Feb 20 (M2) Mar 20 (M3) Apr 20 (M4) May 20 (M5) Jun 20 (M6) Jul 20 (M7) Aug 20 (M8) Sep 20 (M9) Oct 20 (M10) Nov 20 (M11) Dec 20 (M12) Jan 31 (YE)

(c) 12-Day PRE-Election Report for the: Primary (12P) General (12G) Runoff (12R) Convention (12C) Special (12S)

Election on In the State of

(d) 30-Day POST-Election Report for the: General (30G) Runoff (30R) Special (30S)

Election on In the State of

5. Covering Period 05 01 2014 through 05 31 2014

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Chairman Ranae Lentz

Signature of Treasurer Chairman Ranae Lentz [Electronically Filed] Date 08 25 2014

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office Use Only table with 6 columns and 1 row. FEC FORM 3X Rev. 12/2004

to support a candidate

**SCHEDULE H4 (FEC Form 3X)
DISBURSEMENTS FOR ALLOCATED
FEDERAL/NONFEDERAL ACTIVITY**

NAME OF COMMITTEE (In Full)

OHIO REPUBLICAN PARTY STATE CENTRAL & EXECUTIVE COMMITTEE

A. Full Name (Last, First, Middle Initial) FactGem		Transaction ID : H4.286327	Allocated Activity or Event: <input checked="" type="checkbox"/> Administrative <input type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Voter Drive <input type="checkbox"/> Direct Candidate Support <input type="checkbox"/> Public Comm (ref to party only) by PAC	
Mailing Address 2000 Auburn Dr., Suite 330			Allocated Activity or Event Year-To-Date 552030.43	
City Beachwood	State OH	Zip Code 44122	Date 05 / 01 / 2014	
Purpose of Disbursement: Software purchase/license - not candidate specific		001		
Activity or Event Identifier: Administrative		Category/ Type		
FEDERAL SHARE		+	NONFEDERAL SHARE	= TOTAL AMOUNT
7500.00			42500.00	50000.00

B. Full Name (Last, First, Middle Initial) Strategy Group for Phones		Transaction ID : H4.286328	Allocated Activity or Event: <input checked="" type="checkbox"/> Administrative <input type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Voter Drive <input type="checkbox"/> Direct Candidate Support <input type="checkbox"/> Public Comm (ref to party only) by PAC	
Mailing Address 7869 Stagers Loop			Allocated Activity or Event Year-To-Date 552425.50	
City Delaware	State OH	Zip Code 43015	Date 05 / 02 / 2014	
Purpose of Disbursement: Phones - not candidate specific		001		
Activity or Event Identifier: Administrative		Category/ Type		
FEDERAL SHARE		+	NONFEDERAL SHARE	= TOTAL AMOUNT
59.28			335.81	395.07

C. Full Name (Last, First, Middle Initial) West Broad Cellular		Transaction ID : H4.286339	Allocated Activity or Event: <input checked="" type="checkbox"/> Administrative <input type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Voter Drive <input type="checkbox"/> Direct Candidate Support <input type="checkbox"/> Public Comm (ref to party only) by PAC	
Mailing Address 1477 W. Broad St.			Allocated Activity or Event Year-To-Date 552425.50	
City Columbus	State OH	Zip Code 43215	Date 05 / 06 / 2014	
Purpose of Disbursement: Cell phones - not candidate specific - MM 5/14		001		
Activity or Event Identifier: Administrative		Category/ Type		
[MEMO ITEM]				
FEDERAL SHARE		+	NONFEDERAL SHARE	= TOTAL AMOUNT
34.83			197.34	232.17

SUBTOTAL of Allocated Federal and NonFederal Activity This Page

FEDERAL SHARE	+	NONFEDERAL SHARE	=	TOTAL AMOUNT
7659.26		42835.81		50395.07

TOTAL This Period (last page for each line only)(Federal share to 21(a)(I) and NonFederal share to 21(a)(II))

FEDERAL SHARE	NONFEDERAL SHARE	TOTAL AMOUNT

14970728432

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS For Other Than An Authorized Committee

EXHIBIT C

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT Example: If typing, type over the lines. 12FE4M5

OHIO REPUBLICAN PARTY STATE CENTRAL & EXECUTIVE COMMITTEE

ADDRESS (number and street) 211 S. Fifth Street

Check if different than previously reported. (ACC) Columbus OH 43215

2. FEC IDENTIFICATION NUMBER CITY STATE ZIP CODE

C00162339

3. IS THIS REPORT NEW OR AMENDED (N) (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
July 15 Quarterly Report (Q2)
October 15 Quarterly Report (Q3)
January 31 Year-End Report (YE)
July 31 Mid-Year Report (Non-election Year Only) (MY)
Termination Report (TER)

(b) Monthly Report Due On: Feb 20 (M2), Mar 20 (M3), Apr 20 (M4), May 20 (M5), Jun 20 (M6), Jul 20 (M7), Aug 20 (M8), Sep 20 (M9), Oct 20 (M10), Nov 20 (M11), Dec 20 (M12), Jan 31 (YE)

(c) 12-Day PRE-Election Report for the: Primary (12P), General (12G), Runoff (12R), Convention (12C), Special (12S)

Election on 11/04/2014 in the State of

(d) 30-Day POST-Election Report for the: General (30G), Runoff (30R), Special (30S)

Election on in the State of

5. Covering Period 10/01/2014 through 10/15/2014

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Chairman Ranae Lentz

Signature of Treasurer Chairman Ranae Lentz (Electronically Filed) Date 10/23/2014

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office Use Only table with 7 columns and 1 row, and FEC FORM 3X Rev. 12/2004

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input checked="" type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

OHIO REPUBLICAN PARTY STATE CENTRAL & EXECUTIVE COMMITTEE

Full Name (Last, First, Middle Initial)

A. King Strategic Communications

Date of Disbursement

Mailing Address 4605 Morse Road Suite 101

10 / 01 / 2014

City State Zip Code
Gahanna OH 43230

Transaction ID : SB30B.271612

Purpose of Disbursement
Printing/Postage

Amount of Each Disbursement this Period

Candidate Name

STEVE MR. STIVERS

Category/
Type

1780.00

Office Sought: House
 Senate
 President

Disbursement For: 2014

Primary General
 Other (specify) ▼

State: OH District: 15

Full Name (Last, First, Middle Initial)

B. King Strategic Communications

Date of Disbursement

Mailing Address 4605 Morse Road Suite 101

10 / 03 / 2014

City State Zip Code
Gahanna OH 43230

Transaction ID : SB30B.271623

Purpose of Disbursement
Printing/Postage

Amount of Each Disbursement this Period

Candidate Name

STEVE MR. STIVERS

Category/
Type

7458.00

Office Sought: House
 Senate
 President

Disbursement For: 2014

Primary General
 Other (specify) ▼

State: OH District: 15

Full Name (Last, First, Middle Initial)

C. King Strategic Communications

Date of Disbursement

Mailing Address 4605 Morse Road Suite 101

10 / 09 / 2014

City State Zip Code
Gahanna OH 43230

Transaction ID : SB30B.271624

Purpose of Disbursement
Printing/Postage

Amount of Each Disbursement this Period

Candidate Name

PATRICK J. TIBERI

Category/
Type

27008.78

Office Sought: House
 Senate
 President

Disbursement For: 2014

Primary General
 Other (specify) ▼

State: OH District: 12

SUBTOTAL of Disbursements This Page (optional).....▶

36224.78

TOTAL This Period (last page this line number only).....▶

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**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input checked="" type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)
OHIO REPUBLICAN PARTY STATE CENTRAL & EXECUTIVE COMMITTEE

Full Name (Last, First, Middle Initial)

A. King Strategic Communications

Mailing Address 4605 Morse Road Suite 101

City Gahanna State OH Zip Code 43230

Purpose of Disbursement
Printing/Postage

Candidate Name
STEVE MR. STIVERS

Office Sought: House Senate President
Disbursement For: 2014 Primary General Other (specify) ▼

State: OH District: 15

Date of Disbursement

10 / 09 / 2014

Transaction ID : SB30B.271625

Amount of Each Disbursement this Period

30088.81

Full Name (Last, First, Middle Initial)

B. King Strategic Communications

Mailing Address 4605 Morse Road Suite 101

City Gahanna State OH Zip Code 43230

Purpose of Disbursement
Printing/postage

Candidate Name
STEVE MR. STIVERS

Office Sought: House Senate President
Disbursement For: 2014 Primary General Other (specify) ▼

State: OH District: 15

Date of Disbursement

10 / 14 / 2014

Transaction ID : SB30B.271778

Amount of Each Disbursement this Period

31079.99

Full Name (Last, First, Middle Initial)

C. King Strategic Communications

Mailing Address 4605 Morse Road Suite 101

City Gahanna State OH Zip Code 43230

Purpose of Disbursement
Printing/postage

Candidate Name
Bill Johnson for Congress

Office Sought: House Senate President
Disbursement For: 2014 Primary General Other (specify) ▼

State: District:

Date of Disbursement

10 / 14 / 2014

Transaction ID : SB30B.271779

Amount of Each Disbursement this Period

13819.12

SUBTOTAL of Disbursements This Page (optional) ▶

74767.92

TOTAL This Period (last page this line number only) ▶

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EXHIBIT D

Kvamme to use high-tech to help Ohio GOP mine votes Nearly \$1 million budgeted for 'Project Ruby' to identify, track swing voters

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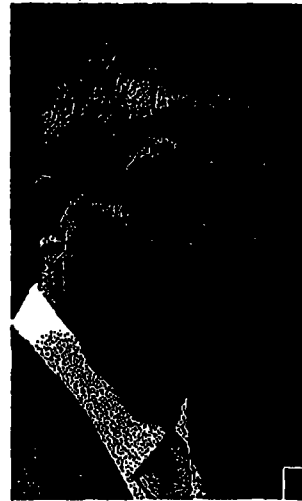
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The man who built Gov. John Kasich's privatized economic-development agency has a new project, one that not only is intended to aid the Republican governor's re-election this fall but could give Kasich a leg up on the field should he choose to run for president in 2016.

Venture capitalist and JobsOhio founder Mark Kvamme and his wife, the former Megan Browning, are developing technology that can compile and sort massive amounts of information on millions of Ohio voters in a searchable database, determine which undecided or unlikely voters can be "moved" to support Republicans based on that information, decide how to allocate resources to move those voters, and track them to make sure they vote.



Mark Kvamme, left, and Gov. John Kasich

REQUEST TO BUY THIS PHOTO

The undertaking, called Project Ruby, is being paid for by the Ohio Republican Party and will be available to candidates besides Kasich. The Ohio GOP has already paid FactGem, Megan Kvamme's company created in May of 2012, \$55,000 for its work. Documents online show Republicans budgeted nearly \$1 million for Project Ruby; Ohio GOP chairman Matt Borges told *The Dispatch* that the project would cost "hundreds of thousands of dollars."

While "micro-targeting," as it's called, is not new to political campaigns, new high-tech methods can make the difference in close elections by swinging small percentages of voters to one side. Kasich enjoys a sizable lead in polling over Democratic nominee Ed FitzGerald right now. But Kasich's 2010 victory over then-Gov. Ted Strickland was by just 77,000 votes.

No campaign in history was able to micro-target through data analytics quite like Democratic President Barack Obama's in 2008, when he spent millions to develop and implement information technology that not only helped him win key swing states such as Ohio, but also exposed massive technological deficiencies on the part of Republican nominee Mitt Romney's campaign, the Republican National Committee and Ohio Republicans.

What the Kvammes are doing in Ohio is meant to not only mitigate whatever advantage FitzGerald might have with analytics — the Cuyahoga County executive has alumni from the Obama team on his payroll — but it comes at a time when Republicans are trying to develop technology to catch up with Democrats. If it works in Ohio this year, it could conceivably work for a Republican vying for the party's presidential nomination in two years.

"Consider Ohio a big test run for this project — if it works, it goes national," said one Republican insider who is familiar with Project Ruby and asked to remain anonymous to discuss sensitive campaign matters.

1002474737

Kvamme to use high-tech to help Ohio GOP mine votes | The Columbu... <http://www.dispatch.com/content/stories/local/2014/05/29/gop-goes-h...>

In an interview, Borges said he first approached Mark Kvamme late in 2012 because of Kvamme's background. The California venture capitalist, whom Kasich brought to Ohio in 2011 to start JobsOhio, helped shape LinkedIn, the social promotion site for business professionals.

Kvamme, who did not return messages seeking comment, left JobsOhio on Nov. 1, 2012, about 5 1/2 months after articles of incorporation were filed for FactGem.

The company is registered to Megan Kvamme in an online filing and appears to have products and customers outside of politics. Mrs. Kvamme, whose father, Gregory Browning, was budget director for Gov. George V. Volinovich, is now spearheading Project Ruby, Borges said. Her chief technology officer at FactGem is Clark Richey, who used to work at the data firm MarkLogic, where Mark Kvamme is a board member.

"What we've built, Democrats won't have anything like it and I don't think it's been done before," Borges said. "It's a data engine that allows us to maximize our voter contact and information."

The first part of Project Ruby is the database. Dozens of data points, such as when people vote, why and for whom, are collected, often through traditional campaign methods of in-person and phone contact. Those points go into the database along with other nuggets such as consumer habits, which can be purchased.

A third source is social media, which is combed for information on undecided or infrequent voters. Kvamme's experience with LinkedIn is expected to influence that portion of the project.

All the information is used to determine pockets of "soft" voters who can be persuaded to vote for Kasich.

The project's other aspect is a mechanism to track targeted voters and make sure they vote. The Romney campaign had technology for this in 2012 — called Project ORCA — that failed miserably on Election Day and cut off Republican volunteers from information they had planned to use to turn out voters in swing states such as Ohio.

FactGem has already developed an app called Canvasser that not only is supposed to succeed where ORCA failed, but also is expected to help in the data gathering for part one of Project Ruby.

Ben LaBolt, national press secretary for the Obama campaign in 2012, said "analytics and technology" can "boost a candidate" but "can't win a campaign on their own." For instance, candidates must have enough money to reach the voters they identified through technology. Kasich has about \$8.5 million on hand compared with FitzGerald's \$1.5 million.

There also is the head start Democrats had in such analytics, which began before Obama was elected in 2008.

"Everything we do is rooted in data," said Meredith Tucker, spokeswoman for the Ohio Democratic Party, which touts the strength of a voter file that stretches back to at least the successful election of U.S. Sen. Sherrod Brown in 2006.

"Republicans have tried and failed for years to catch up to our voter file strategy, so it's no surprise that their goal again is to catch up this year. They might be able to build the infrastructure, but the competitive edge for Democrats is that we've been layering specific data onto our voter file, year in and year out, for over a decade. You can't build that overnight or in one election cycle."

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DOUG ZIMMERMAN (PILSNER)

So Jobs Ohio was just about making jobs to get Kasich elected president!?? Brilliant Smithers!

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