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October 16, 2017

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BY HAND DELIVERY

Mr. Jeff S. Jordan
Assistant General Counsel
Complaints Examination & Legal Administration
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: RR 17L-31 – Wyoming Republican Party, Inc.

Dear Mr. Jordan:

This office represents the Wyoming Republican Party, Inc. (“WY GOP”) and Doug Chamberlain, in his official capacity as treasurer of the WY GOP, in the above-captioned matter.

We received your September 1, 2017 letter enclosing a copy of the Reports Analysis Division’s (“RAD”) referral of the WY GOP to the Federal Election Commission (“FEC” or “Commission”) Office of General Counsel. The referral alleges that the WY GOP failed to disclose all financial activity on its original 2016 October Monthly, 12 Day Pre-General, and Year End Reports.

Given that this matter involves the inadvertent omission of a small group of transactions, which the WY GOP proactively corrected by amending its reports, the Commission should exercise its discretion and assign this matter to the Alternative Dispute Resolution (“ADR”) Division for appropriate action.

FACTS

The WY GOP is a state political party committee that files monthly disclosure reports in accordance with Commission regulations. *See* 11 C.F.R. §§ 104.5(c)(3), 300.36(c). In June 2016, the WY GOP became a participant in Trump Victory, a joint fundraising committee comprised of Donald J. Trump for President, the Republican National Committee (“RNC”), and several other state political party committees. *See* WY GOP Amended Statement of Organization (filed June 3, 2016). As with other modest-sized state party committees on both sides of the aisle, the 2016 election cycle provided the WY GOP with the opportunity to participate in a national joint fundraising effort. Previously, nationally focused joint fundraising committees generally invited only state parties in presidential battleground states to

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participate in such efforts. Trump Victory was the first joint fundraising committee in which the WY GOP participated during the last 20 years.

On September 30, 2016, the WY GOP received its first transfer of joint fundraising proceeds from Trump Victory. Later that same day, the WY GOP transferred these funds to the RNC and paid a fee for the transfer. Similar transfers were received and made on October 17, 2016, December 2, 2016, and December 16, 2016.

Due to a miscommunication between two WY GOP vendors, the September 30, 2016, October 17, 2016, December 2, 2016, and December 16, 2016 transfers and fees were inadvertently not disclosed on the WY GOP's original reports filed with the FEC. After the WY GOP realized that its reports did not disclose the transfers, it acted on its own accord and proactively amended the reports.

DISCUSSION

For the reasons set forth below, the Commission should refer this matter to ADR for appropriate disposition:

First, this matter involves only a small group of inadvertently omitted transactions, and the referral is not indicative of ongoing or widespread compliance issues. The only Requests for Additional Information ("RFAIs") that the WY GOP received regarding reports covering 2016 are the RFAIs at issue in this matter, and the WY GOP has not received any RFAIs regarding its reports covering 2017.

Second, the WY GOP proactively amended its reports to disclose the transfers prior to receiving any RFAIs from RAD regarding the omission. Since Trump Victory and the RNC reported the transfers, RAD would have sent the WY GOP RFAIs questioning the missing transfers if the WY GOP had not first amended its reports.

Third, Trump Victory and the RNC disclosed the transfers at issue on or before the applicable reporting deadlines. Accordingly, the WY GOP's inadvertent reporting errors did not prevent timely public disclosure of the transfers. Specifically, Trump Victory duly disclosed the transfers it made to the WY GOP on its 2016 October Quarterly Report (filed October 15, 2016), its 2016 12 Day Pre-General Report (filed October 27, 2016), and its 2016 Year End Report (filed January 31, 2017). Moreover, the RNC duly disclosed the transfers it received from the WY GOP on its 2016 October Monthly Report (filed October 20, 2016), its 2016 12 Day Pre-



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General Report (filed October 27, 2016), and its 2016 Year End Report (filed January 31, 2017).

Finally, based on a review of the public record, a number of Democratic and Republican state party committees alike filed similar amendments to reports covering the 2016 cycle to correct inadvertent omissions of joint fundraising and national party transfers. The 2016 election cycle provided modest-sized state parties with increased opportunities to participate in joint fundraising committees, and for many state parties—including the WY GOP—it was the first time they had participated in a joint fundraising effort in several election cycles. Given that these reporting issues appear to have impacted multiple committees on both sides of the aisle, an efficient way to prevent a recurrence of these issues would be to allow a collaborative undertaking with ADR for this matter and all similar matters pending before the Commission.

* * *

For all of the reasons set forth above, the Commission should exercise its discretion and assign this matter to ADR for appropriate disposition.

Respectfully Submitted,

A handwritten signature in blue ink that reads "Michael E. Toner".

Michael E. Toner
Brandis L. Zehr

cc: Chairman Steve T. Walther
Vice Chair Caroline C. Hunter
Commissioner Ellen L. Weintraub
Commissioner Lee E. Goodman
Commissioner Matthew S. Petersen



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STATEMENT OF DESIGNATION OF COUNSEL
Please use **one** form for each Respondent/Entity/Treasurer
FAX (202) 219-3923

MUR # RR 17L-31

NAME OF COUNSEL: Michael E. Toner; Brandis L. Zehr

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The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

10/11/17
 Date

Doug Chamberlain
 Respondent/Agent -Signature

Treasurer
 Title(Treasurer/Candidate/Owner)

RESPONDENT: Doug Chamberlain, in his official capacity as Treasurer
 (Committee Name, Company Name, or Individual Named in Notification Letter)

MAILING ADDRESS: Wyoming Republican Party, Inc.
 (Please Print)

1714 Capitol Avenue, Cheyenne, WY 82001

TELEPHONE- HOME ()

BUSINESS ()

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation