

REPUBLICAN FEDERAL COMMITTEE OF PENNSYLVANIA

Carolyn Welsh, Treasurer

112 STATE STREET
HARRISBURG, PA 17101
717-234-4901

November 19, 2014

Via email: kcollins@fec.gov
Attn: Kim Collins, Paralegal
Federal Election Commission
Office of Complaints, Examination and Legal Administration
999 E Street, NW
Washington, DC 20436

RECEIVED
FEDERAL ELECTION
COMMISSION
2014 DEC -9 PM 16:46
OFFICE OF COMPLAINTS
AND LEGAL ADMINISTRATION

RE: MUR-6899
**STATEMENT UNDER OATH OF CAROLYN WELSH, TREASURER OF
THE REPUBLICAN FEDERAL COMMITTEE OF PENNSYLVANIA**

Dear Ms. Collins:

I am the Treasurer of the Republican Federal Committee of Pennsylvania ("RFCP"). I have reviewed your letter, dated, November 7, 2014 (but received on November 12, 2014), which attached a letter from Mary Ellen Balchunis for Congress Committee alleging a complaint docketed as MUR-6899 (the "Complaint"). The Complaint is without any basis in fact or law. This sworn statement is submitted on behalf of the RFCP and me, as the Treasurer, in response to the allegations in the Complaint.

1. The Mailing identified in the Complaint (the "Mailing") qualified for the volunteer materials exemption under 2 U.S.C. §§431(8)(B)(ix) and (9)(B)(viii) and 11 C.F.R. §§100.87 and 100.147.
2. As the Mailing qualified for the volunteer materials exemption, the disclaimer used for the Mailing complies with the disclaimer requirements of 11 C.F.R. §110.11(e).
3. The Mailing satisfied the regulatory requirements necessary to qualify for volunteer materials exemption.
4. The information in the Mailing and the list of those to whom it was sent were not obtained from any commercial mailing list.
5. The RFCP used only federal funds to pay for the Mailing.
6. The Mailing was not direct mail as defined in the regulations.
7. The Mailing does not require an "authorized by" statement because it qualifies for the volunteer materials exemption under 11 C.F.R. §110.11(e).
8. The photos in the Mailing were not provided by the Candidate or the Candidate's Committee.

9. I am attaching the sworn statement of Zach Niles, the RFCP volunteer non-allocable mail coordinator who supervised the volunteers for the Mailing, attesting to the facts that the Mailing satisfies the requirements of the volunteer materials exemption regulations.
10. The Complaint does not allege any facts that challenge or question the Mailing's compliance with the volunteer materials exemption. The Complaint does not assert any facts regarding the source of the funds used by the RFCP for the Mailing or that the Mailing does not comply with any of the requirements of the volunteer materials exemption.

For all of the foregoing reasons, the Complaint should be dismissed in its entirety.

11-21-14
Date

Carolyn Welsh
Carolyn Welsh, Treasurer and also on behalf
of the Republican Federal Committee of
Pennsylvania

Subscribed and sworn to before me this 21st day of November 2014.

Rebecca S. Yepremian
Notary Public

