



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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REG-10-001

Paul A. Strabala, Treasurer
Elections Committee of the
County of Orange
1700 East Garry, Ste. 108
Santa Ana, CA 92705

Identification Number: C00192302

Reference: Mid-Year Report (1/1/93-6/30/93)

Dear Mr. Strabala:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report does not include a Schedule H1 to disclose the ratio for the allocation of administrative and generic voter drive costs. This ratio is determined at the beginning of each two-year election cycle. All shared administrative and generic voter drive costs incurred during the two-year cycle must be allocated according to this ratio, unless the federal account elects to pay a higher percentage of its cost. 11 CFR §106.5(b)(2), (d)(1), (d)(2) and 11 CFR §§104.10(b)(1)(ii)(B) and 106.6(c)

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedules B and H4 of your report to clarify the following descriptions: reimbursement supply, reimbursement and reimburse volunteer. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-The identification of each contributor, including the person's occupation and name of employer, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry lacking a contributor's occupation and name of employer.

Note: If your committee has made attempts, either by a written request or by an oral request documented in writing to obtain this information from each contributor, your committee may have exercised "best

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efforts." Under revised 11 CFR 104.7(b), such effort shall consist of an initial clear and conspicuous request for the name, mailing address, occupation, and name of employer of each individual who has contributed over \$200 in the calendar year which informs the contributor that the reporting of such information is required by law. If necessary, your committee must make a written follow-up request or an oral follow-up request documented in writing, within thirty days with no additional solicitation. Subsequently, the committee should report any changes provided by the contributor or any additional information which is in the committee's records. If you believe that your committee satisfies the "best efforts" provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contribution information. Clarification regarding "best efforts" should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. 11 CFR §104.3(a)(4)(i)

-Your committee reports disbursements on Schedule B and Schedule H4 which appear to be identical. Please note that any activity which is financed entirely by the federal account should be reported on Schedule B supporting Line 21(b), not Schedule H4 supporting Line 21(a)(i). Likewise, any allocable expenses which are paid jointly should only be disclosed on Schedule H4 supporting Line 21(a)(i), not Schedule B supporting Line 21(b). Duplication in reporting disbursements may cause inflated disbursement totals. Please amend your report to clarify your disbursements. 11 CFR §106.5

-Your report includes computer produced formats of Schedule A. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

-Please clarify all expenditures made for advertising on Schedules H4 and B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or E supporting Line 23 or 24 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

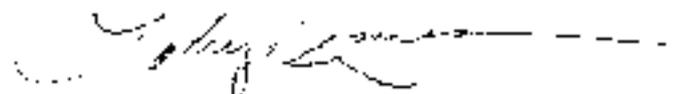
-Please amend your report by providing the address and specific date for each disbursement itemized on Schedules H4 and B supporting Lines 21(a) and 21(b).

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A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Robyn Jameson
Reports Analyst
Reports Analysis Division

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