



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 7, 1999

RQ-3

Alexander Isaac, Treasurer
Genesee County Democratic Party
Federal Account
1318 W. Court Street
Flint, MI 48503

Identification Number: C00299339

Reference: Amended 30 Day Post-General Report (10/1/96-11/25/96), dated
5/21/99

Dear Mr. Isaac:

On September 15, 1999 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

The Commission is in receipt of your letter dated October 1, 1999. Please be advised that if the information requested by the Commission is not received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Donald Averett on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Alexander Isaac, Treasurer
Genesee County Democratic
Party Federal Account
1318 W. Court St.
Flint, MI 48503

SEP 18 1999

Identification Number: C00299339

Reference: Amended 30 Day Post-General Report (10/1/96-11/25/96, dated 5/2/1/99)

Dear Mr. Isaac:

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:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends

**GENESEE COUNTY DEMOCRATIC PARTY FEDERAL ACCOUNT
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that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Schedule A of your report discloses transfers from the 9th District Democratic Committee, however these transfers were not disclosed on their report(s) of receipts and disbursements. It appears that your committee has received transfers from a non-federal account of the 9th District Democratic Committee. Schedule A further disclosed a transfer from the Fifth Congressional District Democratic Party State Account. Any transfer(s) received by your committee from these entities are prohibited by 11 CFR §102.5(a) and must be transferred to your non-federal account or returned to the donor. Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on your next report.

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the impermissible funds or clarification of these transactions, will be taken into consideration.


-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have not included the full name and/or mailing address for the vendor(s) listed. Please amend your report accordingly.

GENESEE COUNTY DEMOCRATIC PARTY FEDERAL ACCOUNT

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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) 694-1130.

Sincerely,



Donald L. Averett
Reports Analyst
Reports Analysis Division

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SCHEDULE A

ITEMIZED RECEIPTS

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

11C

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)

A. Full Name, Mailing Address and ZIP Code
Committee to Elect Tim Howard
3196 Birch Lane DR
Fitch, WI 53544

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

11-5-96

500.00

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date > A 500.00

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

11-8-96

200.00

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date > B 700.00

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date > C

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date > D

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date > E

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date > F

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date > G

26525.79

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

26525.79

