



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAR 20 1996

Michael R. Robinson, Treasurer
Elections Committee of
the County of Orange
1700 East Garry, Suite 108
Santa Ana, CA 92705

Identification Number: C00192302

Reference: Year End Report (7/1/95-12/31/95)

Dear Mr. Robinson:

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:

-2 U.S.C. §434(b)(3) requires itemization of contributions from individuals and persons other than political committees, where the aggregate total from the contributor exceeds \$200 in a calendar year. In addition, 11 CFR §104.3(a)(2)(i)(B) requires a committee to report the total amount of unitemized contributions (see Line 11(a)(ii) of the Detailed Summary Page). If a committee wishes to disclose contributions regardless of the amount contributed, the committee must separate (on separate receipt schedules) those contributors requiring itemization from those who are not required to be itemized. 11 CFR §104.3(a)(4)(i) For future filings, please submit your reports in this order.

-On Schedule H2, you disclose the ratio for "Annual Dinner" to be the same as previously reported; however, it appears that this activity/event was not previously reported. Please amend your report to clarify this discrepancy. 11 CFR §104.10(a)(1)

-Schedule H4 discloses a 100% federal allocation ratio for certain administrative/voter drive and fundraising expenses. These disbursements which are 100% federal should be disclosed on the Schedule B for Line 21(b). Please amend your report to clarify this discrepancy.

-11 CFR §104.10(a)(1) requires a unique identifying title or code for each shared program or activity

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

ELECTIONS COMMITTEE OF THE COUNTY OF ORANGE
PAGE 2

conducted on behalf of federal and non-federal candidates. On Schedule H2, you have failed to provide a unique identifying code for fundraising disbursements (see attachment(s)). Please amend all schedules where a unique title or code was not provided for an activity/event.

-Schedule H4 of your report discloses a disbursement(s) to ECCO Fund, Inc. Please be advised that contributions to federal and non-federal committees do not qualify as shared expenses to be allocated between your federal and non-federal accounts. Contributions to federal committees should be disclosed on a Schedule B supporting Line 23 of the Detailed Summary Page and contributions to non-federal committees on a separate Schedule B supporting Line 29. Any reimbursement from your committee's non-federal account for any portion of this contribution(s) is not permissible. 11 CFR §102.5(a)(1)(i) Please clarify your relationship to ECCO Fund, Inc. and amend your Statement of Organization if ECCO Fund, Inc. is your connected organization.

The Commission recommends that you immediately transfer the funds received by your federal account, as reimbursement for the non-federal portion, back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Your Schedule H4 discloses a \$1,000 disbursement to ECCO Fund, Inc. The disbursement is categorized as exempt. The exempt category is reserved for a restricted type of activity that party committees may take part in. Because your committee is a non-party committee, please amend your report to clarify this discrepancy.

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B or H4 supporting Line 21(b) or 21(a) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected

ELECTIONS COMMITTEE OF THE COUNTY OF ORANGE
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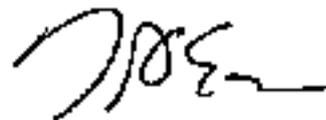
organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

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,



Neil Evans
Reports Analyst
Reports Analysis Division

**JOINT FEDERAL/NON-FEDERAL
 ACTIVITY SCHEDULE**

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FOR LINE 21a	

NAME OF COMMITTEE
 ELECTIONS COMMITTEE OF THE COUNTY OF ORANGE, I.D. #C00192301

A. FULL NAME, MAILING ADDRESS & ZIP CODE	PERIODICITY	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Orange County Blade P.O. Box 1538 Laguna Beach, CA 92652	"Annual" DINNER Advertising	7-17-95 8-17-95	444.00 444.00	272.00 272.00	272.00 0.00
DIRECTOR: <input type="checkbox"/> ADMINISTRATOR: <input type="checkbox"/> OFFICE: <input type="checkbox"/> FEDERAL: <input type="checkbox"/> STATE: <input type="checkbox"/> COUNTY: <input type="checkbox"/> CITY: <input type="checkbox"/> DATE THIS PAGE: 4-23-91					
O.C.C.P. P.O. Box 1125 Orange, CA 92668	Festival Booth	7-17-95	25.00	17.50	17.50
DIRECTOR: <input type="checkbox"/> ADMINISTRATOR: <input type="checkbox"/> OFFICE: <input type="checkbox"/> FEDERAL: <input type="checkbox"/> STATE: <input type="checkbox"/> COUNTY: <input type="checkbox"/> CITY: <input type="checkbox"/> DATE THIS PAGE: 4-22-91					
US postmaster Santa Ana, CA 92705	postage	7-24-95 8-18-95	344.00 250.00	172.00 250.00	172.00 0.00
DIRECTOR: <input type="checkbox"/> ADMINISTRATOR: <input type="checkbox"/> OFFICE: <input type="checkbox"/> FEDERAL: <input type="checkbox"/> STATE: <input type="checkbox"/> COUNTY: <input type="checkbox"/> CITY: <input type="checkbox"/> DATE THIS PAGE: 4-21-91					
Newport printers 2121 San Joaquin Hills Newport Beach, CA 92660	Stationery	7-24-95 8-18-95	1181.25 201.49	565.62 100.74	565.63 100.75
DIRECTOR: <input type="checkbox"/> ADMINISTRATOR: <input type="checkbox"/> OFFICE: <input type="checkbox"/> FEDERAL: <input type="checkbox"/> STATE: <input type="checkbox"/> COUNTY: <input type="checkbox"/> CITY: <input type="checkbox"/> DATE THIS PAGE: 4-21-91					
Pizza Hut Santa Ana, CA	Food	7-24-95	25.00	12.50	12.50
DIRECTOR: <input type="checkbox"/> ADMINISTRATOR: <input type="checkbox"/> OFFICE: <input type="checkbox"/> FEDERAL: <input type="checkbox"/> STATE: <input type="checkbox"/> COUNTY: <input type="checkbox"/> CITY: <input type="checkbox"/> DATE THIS PAGE: 4-21-91					
LSW Insurance 12100 Wilshire Blvd Los Angeles, CA 90025	INSURANCE	7-29-95	412.50	206.25	206.25
DIRECTOR: <input type="checkbox"/> ADMINISTRATOR: <input type="checkbox"/> OFFICE: <input type="checkbox"/> FEDERAL: <input type="checkbox"/> STATE: <input type="checkbox"/> COUNTY: <input type="checkbox"/> CITY: <input type="checkbox"/> DATE THIS PAGE: 4-21-91					
TOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE			3277.24	1995.41	1291.63

TOTAL THIS PERIOD (SEE INSTRUCTIONS) FOR FEDERAL AND NON-FEDERAL ACTIVITY

JOINT FEDERAL-NON-FEDERAL
 ACTIVITY SCHEDULE

NAME OF COMMITTEE

ELECTIONS COMMITTEE OF THE COUNTY OF ORANGE, I.D. #CDD192302

A. FULL NAME, MAILING ADDRESS & ZIP CODE	PERFORMANCE	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
ASF 17982 Sky Park, J Irvine, CA 92714	Advertising	8-7-95	100.00	50.00	50.00
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE OTHER SHARE <input type="checkbox"/> FINANCING <input type="checkbox"/> EMBRY FIRST YEAR TO DATE: 122,936.73 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
B. FULL NAME, MAILING ADDRESS & ZIP CODE	PERFORMANCE	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Gary Rhodes 27 Pinewood Irvine, CA 92714	office reimbursement	8-1-95 10-13-95 11-9-95	51.72 400.00 93.73	25.86 200.00 46.84	25.86 200.00 46.87
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE OTHER SHARE <input type="checkbox"/> FINANCING <input type="checkbox"/> EMBRY FIRST YEAR TO DATE: 469.06 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
C. FULL NAME, MAILING ADDRESS & ZIP CODE	PERFORMANCE	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Pacific Bell Van Nuys, Ca 91388-0001	telephone	8-1-95 9-1-95 9-26-95 10-28-95 11-21-95	120.79 123.27 134.27 131.36 132.31	60.37 61.64 67.13 65.67 69.15	60.36 61.63 67.14 65.68 64.16
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE OTHER SHARE <input type="checkbox"/> FINANCING <input type="checkbox"/> EMBRY FIRST YEAR TO DATE: 233,584.67 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
D. FULL NAME, MAILING ADDRESS & ZIP CODE	PERFORMANCE	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Southern California Edison P.O. Box 600 Pasadena, CA 91771	electricity	8-1-95 9-1-95 9-26-95 10-25-95 11-28-95	90.64 86.47 112.37 95.24 80.61	45.32 43.22 56.18 47.62 80.81	45.32 43.21 56.19 47.62 0.00
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE OTHER SHARE <input type="checkbox"/> FINANCING <input type="checkbox"/> EMBRY FIRST YEAR TO DATE: 224,552.16 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
E. FULL NAME, MAILING ADDRESS & ZIP CODE	PERFORMANCE	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Jason Stora 8172 Rockwood Cir. Wheat Ridge, CA 92683	annual donations	10-13-95	285.76	142.88	142.88
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE OTHER SHARE <input checked="" type="checkbox"/> FINANCING <input type="checkbox"/> EMBRY FIRST YEAR TO DATE: 1,4892.82 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
F. FULL NAME, MAILING ADDRESS & ZIP CODE	PERFORMANCE	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Carl Bernier 31 Extrada W. Irvine, CA 92720	office Supplies	10-13-95 11-7-95	927.27 128.18	463.63 64.09	463.64 64.09
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE OTHER SHARE <input type="checkbox"/> FINANCING <input type="checkbox"/> EMBRY FIRST YEAR TO DATE: 175,105.61 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
TOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE			3100.09	1590.44	1509.65
TOTAL THIS PERIOD (see page 1 for instructions)					

STATEMENT OF RECEIPTS AND EXPENDITURES FOR THE MONTH OF SEPTEMBER 1995

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FOR LINE 20

NAME OF COMMITTEE
ELECTIONS COMMITTEE OF THE COUNTY OF ORANGE, I.D. #C00192302

DATE	DESCRIPTION	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
9-11-95	Supper at 1942 E. Edinger Santa Ana, CA 92705	9-11-95	285.84	142.62	142.62
10-13-95	Printing	10-13-95	1200.78	610.39	610.39
GRAND TOTAL: \$ 4239.84					
9-26-95	Printing for Annual Dinner Gift	9-26-95	35.00	7.50	27.50
GRAND TOTAL: \$ 6434.84					
10-18-95	ad for O'Heuler Event	10-18-95	369.00	184.50	184.50
GRAND TOTAL: \$ 9297.00					
10-18-95	ad for Annual Event	10-18-95	400.00	200.00	200.00
GRAND TOTAL: \$ 9697.00					
9-26-95	Office Paper	9-26-95	43.17	43.17	
11-1-95	Printing	11-1-95	43.17	21.58	21.59
GRAND TOTAL: \$ 9783.34					
9-28-95	Printing	9-28-95	150.00	150.00	
10-28-95	Printing	10-28-95	90.89	90.89	
11-1-95	Printing	11-1-95	133.10	66.50	66.55
GRAND TOTAL: \$ 10157.33					
GRAND TOTAL OF ALL FEDERAL AND NON-FEDERAL ACTIVITY DURING			2770.95	1517.25	1253.15
TOTAL THE FUND BALANCE AS OF SEPTEMBER 30, 1995					

**JOINT FEDERAL/NON-FEDERAL
ACTIVITY SCHEDULE**

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FOR LINE 24

NAME OF COMMITTEE
ELECTIONS COMMITTEE OF THE COUNTY OF ORANGE, I.D. #C00192303

A. FULL NAME, ADDRESS & ZIP CODE	PURPOSE OF CONTRIBUTION	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
DEAFIC 4132 Buena Vista, #101-114 Irvine, CA 92714	"Anti Front" production	11-1-95	250.00	125.00	125.00
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE EXPENSE <input checked="" type="checkbox"/> RAISING <input type="checkbox"/> OTHER DATE PAID: 1,250.00 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
ELLCO Fund, Inc. 47700 E. Gary, #100 Santa Ana, CA 92705	contribution	11-9-95	1000.00	500.00	500.00
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE EXPENSE <input type="checkbox"/> RAISING <input type="checkbox"/> OTHER DATE PAID: 1,100.00 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
Michael Robinson 337 1/2 Crystal Napier Beach, CA 92662	postage	11-14-95 9-13-95 12-12-95	250.00 28.77 123.87	125.00 28.77 123.87	125.00 0.00 0.00
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE EXPENSE <input type="checkbox"/> RAISING <input type="checkbox"/> OTHER DATE PAID: 276.29.14 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
L & E Engraving 262 N. McHardy St. Orange, CA 92667	postage	11-21-95	175.00	87.50	87.50
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE EXPENSE <input type="checkbox"/> RAISING <input type="checkbox"/> OTHER DATE PAID: 1,238.69 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
Amber Smith 20 S. Grand Foothill, CA 91030	postage	11-21-95	437.39	238.70	238.69
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE EXPENSE <input type="checkbox"/> RAISING <input type="checkbox"/> OTHER DATE PAID: 1,176.19 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
(Faint, illegible text)	(Faint, illegible text)	(Faint, illegible text)	2345.02	1228.84	1076.19
(Faint, illegible text)	(Faint, illegible text)	(Faint, illegible text)	2371.24	11,790.22	8801.07

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