



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Teresa Ann Reid, Treasurer  
Rogers for Congress  
P.O. Box 581  
Brighton, MI 48116

Identification Number: C00343863

JAN 30 2001

Reference: 12 Day Pre-General Report (10/1/00-10/18/00)

Dear Ms. Reid:

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:

-Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for Lines 15, 22 and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the year-to-date totals for the calendar year 2000.

-Columns A and B, Line 7(a) of the Summary Page should equal Columns A and B, Line 17 of the Detailed Summary Page.

-Line 11(e), Column B, of the Detailed Summary Page does not equal the sum of Lines 11(a) through 11(d). Please correct this discrepancy and file an amendment to your report. (11 CFR §104.3(a))

-Line 16, Column B, of the Detailed Summary Page does not equal the sum of Lines 11(e), 12, 13(c), 14 and 15. Please correct this discrepancy and file an amendment to your report.

-Commission Regulations require that a committee disclose the

identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2))  
The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on

demonstrating "best efforts," please refer to the Campaign Guide.

-On Schedule B of your report, you have itemized disbursements for which you have failed to include the complete address and purpose. Please amend your report to include the missing information. (11 CFR §104.3(b)(4))

-Commission Regulations define the term "purpose" to mean a brief statement or description of why a disbursement was made. Examples are "dinner expense", "media", "salary", "polling", "travel", "party fees", "phone banks", "travel expenses", "travel expense reimbursement" and "catering costs". Examples of election day and voter registration activity include "exit polling", "door-to-door get out the vote", "get out the vote phone calls" and "driving voters to the polls". Unacceptable descriptions, which require additional clarification, include but are not limited to "advance", "consulting", "commission", "contract labor", "election day expense", "expenses", "other expenses", "expense reimbursement", "miscellaneous", "outside services", "get-out-the-vote" and "voter registration". (11 CFR § 104.3(b)(4) Please amend Schedule B of your report to correct the descriptions which do not meet the requirements of the Regulations.

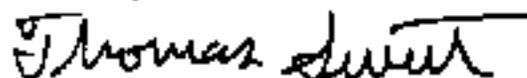
-Schedule B of your report discloses reimbursements to individuals for transactions other than travel, meals and lodging. Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information. (11 CFR § 104.9)

-Schedule A of your report discloses earmarked contributions through a conduit. Please be reminded that when a committee receives an earmarked contribution(s) through an allowable conduit, each individual contribution should be itemized when the individual's total contributions to your committee aggregate over \$200 per calendar year. This itemization must include the full name, address, occupation, and employer of the individual contributor along with the date the contribution was received by the conduit.

In addition, the total contribution(s) received through the conduit should be itemized on Schedule A as a memo entry. The conduit's full name and address (and occupation and employer if the conduit is an individual) must also be provided, along with the date the contribution(s) was transferred to your committee and the total amount of earmarked contributions received from the conduit. Any unitemized contributions received through the conduit should be included in your totals on Line 11(a)(ii) of the Detailed Summary Page. Please refer to the FEC Campaign Guide for Congressional Candidates and Committees for further guidance on how to report earmarked contributions through a conduit. (11 CFR §110.6(c)(2))

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 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Thomas Sweet  
Reports Analyst  
Reports Analysis Division

