



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

RQ-3

April 11, 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 to inform you that as of April 10, 1996, the Commission has not received your response to our request for additional information, dated March 20, 1996. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is 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 Neil Evans on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

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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)(1)(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
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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

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ELECTIONS COMMITTEE OF THE COUNTY OF ORANGE
PAGE 3

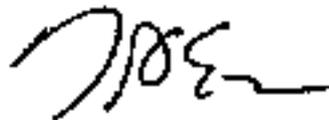
organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for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

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FORM 990-SS
 1995

**JOINT FEDERAL AND NON-FEDERAL
 ACTIVITY SCHEDULE**

LINE 2	6
FOR LINE 24	

NAME OF CONTRIBUTOR

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

CONTRIBUTOR NAME, ADDRESS & ZIP CODE	PURPOSE	DATE	TOTAL AMOUNT	FEDERAL DUES	NON-FEDERAL DUES
Orange County Blade P.O. Box 1538 Orange Beach, Ca 92652	Annual Dinner Advertising	7-7-95 8-7-95	444.00 444.00	222.00 222.00	222.00 222.00
ORANGE COUNTY: <input type="checkbox"/> ADMINISTRATIVE DUES <input type="checkbox"/> FINANCIAL <input type="checkbox"/> ELECTION DATE THIS YEAR: 4,432.61 <input type="checkbox"/> DIRECTORIAL DUES					
B.C.C.P. P.O. Box 1125 Orange, Ca 92668	Festival Booth	7-17-95	25.00	12.50	12.50
ORANGE COUNTY: <input type="checkbox"/> ADMINISTRATIVE DUES <input type="checkbox"/> FINANCIAL <input type="checkbox"/> ELECTION DATE THIS YEAR: 4,462.61 <input type="checkbox"/> DIRECTORIAL DUES					
US Postmaster Santa Ana, Ca 92705	postage	7-24-95 8-19-95	344.00 250.00	172.00 250.00	172.00 0.00
ORANGE COUNTY: <input type="checkbox"/> ADMINISTRATIVE DUES <input type="checkbox"/> FINANCIAL <input type="checkbox"/> ELECTION DATE THIS YEAR: 4,714.61 <input type="checkbox"/> DIRECTORIAL DUES					
Newport printers 210 San Joaquin Hill Newport Beach, Ca 92660	NEWSPAPER	7-24-95 8-18-95	1131.25 201.49	565.62 100.74	565.63 100.75
ORANGE COUNTY: <input type="checkbox"/> ADMINISTRATIVE DUES <input type="checkbox"/> FINANCIAL <input type="checkbox"/> ELECTION DATE THIS YEAR: 5,845.86 <input type="checkbox"/> DIRECTORIAL DUES					
PISA Santa Ana, Ca	POSTAGE	7-24-95	25.00	12.50	12.50
ORANGE COUNTY: <input type="checkbox"/> ADMINISTRATIVE DUES <input type="checkbox"/> FINANCIAL <input type="checkbox"/> ELECTION DATE THIS YEAR: 6,070.86 <input type="checkbox"/> DIRECTORIAL DUES					
LSW Insurance 12100 Wilshire Blvd Los Angeles, Ca 90025	INSURANCE	7-29-95	412.50	206.25	206.25
ORANGE COUNTY: <input type="checkbox"/> ADMINISTRATIVE DUES <input type="checkbox"/> FINANCIAL <input type="checkbox"/> ELECTION DATE THIS YEAR: 6,483.36 <input type="checkbox"/> DIRECTORIAL DUES					
GRAND TOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS YEAR			3277.24	1985.61	1291.63

TOTAL THE PERIOD FOR WHICH THIS REPORT IS PREPARED IS 12 MONTHS

REGISTRATION SCHEDULE HA
 FEDERAL ELECTIONS

JOINT FEDERAL/NON-FEDERAL
 ACTIVITY SCHEDULE

PAGE 3 OF 4
 FOR LINE 21a

NAME OF COMMITTEE

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

A. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/REASON	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
ASF 17782 Sky Park, J Irvine, CA 92714	advertising	8-7-95	100.00	50.00	50.00
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE EXPENSE <input type="checkbox"/> RAISES <input type="checkbox"/> DEBT FIRST YEAR TO DATE: 223,936.73 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
B. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/REASON	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Gary Rhodes 27 Pinewood Irvine, CA 92714	office reimburse	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 EXPENSE <input type="checkbox"/> RAISES <input type="checkbox"/> DEBT FIRST YEAR TO DATE: 4,404.06 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
C. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/REASON	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Pacific Bell Attn Nugs, Ca 91388-0001	telephone	8-1-95 7-1-95 7-26-95 10-28-95 11-21-95	170.73 127.27 134.27 131.36 138.31	60.37 61.64 67.13 65.08 69.15	60.36 61.63 67.14 65.08 69.16
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE EXPENSE <input type="checkbox"/> RAISES <input type="checkbox"/> DEBT FIRST YEAR TO DATE: 223,584.67 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
D. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/REASON	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Southern California Edison P.O. Box 600 Rosemead, CA 91771	electricity	8-1-95 9-1-95 9-26-95 10-28-95 11-21-95	90.64 86.47 112.37 95.24 80.51	45.32 43.22 54.18 47.62 80.51	45.32 43.21 56.19 47.62 0.00
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE EXPENSE <input type="checkbox"/> RAISES <input type="checkbox"/> DEBT FIRST YEAR TO DATE: 224,050.16 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
E. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/REASON	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Jason Stora 8172 Rockwood Cir. Westminster, CA 92683	annual donation	10-13-95	285.76	142.88	142.88
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE EXPENSE <input checked="" type="checkbox"/> RAISES <input type="checkbox"/> DEBT FIRST YEAR TO DATE: 4,292.82 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
F. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/REASON	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Carl Bernson 31 Entrada W. Irvine, CA 92700	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 EXPENSE <input type="checkbox"/> RAISES <input type="checkbox"/> DEBT FIRST YEAR TO DATE: 875,195.61 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
TOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PERIOD			3,100.09	1,590.44	1,509.65
TOTAL THIS PERIOD (see top of each page for instructions)					

STATE OF CALIFORNIA COUNTY OF ORANGE
 COUNTY SCHOOLS

FORM 20
 FOR LINE 20

NAME OF CONTRIBUTOR
 ELECTIONS COMMITTEE OF THE COUNTY OF ORANGE, I.B. 9000192302

NAME OF CONTRIBUTOR	ADDRESS	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Super-printers 1942 S. Edinger Santa Ana, CA 92705	Printing	9-21-95 10-12-95	285.24 1120.78	147.62 610.39	147.62 610.39
Fraser's Workshop 410 24421 Peacock St Bala Park, CA 92630	Printing for Manual Boxes Gift	9-26-95	35.00	7.50	27.50
630 Publishing 2853 Lincoln Blvd Santa Monica, CA 90405	ad for O'Hauler Event	10-18-95	369.00	184.50	184.50
Orange County Blade P.O. Box 1536 Uyana Beach, CA 92652	ad for Home Frank Event	10-18-95	400.00	200.00	200.00
Kinkos 4187 Campus Irvine, CA 92715	office papers	9-26-95 11-7-95	43.17 43.17	43.17 21.58	0 21.59
Rubin, Carlin 20 Galea Foothill Ranch, CA 92705	Printing Boxes Office	9-28-95 10-22-95 11-7-95	150.00 90.89 158.10	150.00 90.89 66.60	0 0 66.55
TOTAL			2770.96	1317.25	1253.15

TOTAL THE FUND RECEIVED FROM THIS SOURCE IS \$1253.15

JOINT FEDERAL/NON-FEDERAL
ACTIVITY SCHEDULE

FORM NO. 1
FOR USE IN

COMMISSIONER OF THE COUNTY OF ORANGE, I.D. #000192302

CONTRIBUTOR NAME AND ADDRESS	PERFORMANCE	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
DCAPAC 182 BAYVIEW, #10-114 Twin, CA 92714	"None Front" production	11-1-95	250.00	125.00	125.00
CONTRIBUTOR NAME AND ADDRESS	PERFORMANCE	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
ECCO Fund, Inc. 7300 E. Garry, #108 Anaheim, CA 92705	contribution	11-9-95	1000.00	500.00	500.00
CONTRIBUTOR NAME AND ADDRESS	PERFORMANCE	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Michael Robinson 737 W. Crystal Hesperia Beach, CA 92602	posting	11-14-95 9-15-95 10-25-95	250.00 28.77 123.87	125.00 28.77 123.87	125.00 0.00 0.00
CONTRIBUTOR NAME AND ADDRESS	PERFORMANCE	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
E + E Engineering 262 N. Milford St. Orange, CA 92667	playing for hours	11-21-95	175.00	87.50	87.50
CONTRIBUTOR NAME AND ADDRESS	PERFORMANCE	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Arthur Gally 20 GARDEN FOUNTAIN VALLEY		11-21-95	238.69	238.70	238.69
			2845.03	1228.24	1076.19
			291.24	1179.22	8801.07

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