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# THE LINCOLN CLUB OF ORANGE COUNTY

Post Office Box 8095 • Newport Beach, California 92658 • (714) 481-5102 • Fax (714) 481-5104

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## EXECUTIVE DIRECTOR

Wendy J. Cantor

December 11, 2000

Angel Williamson  
Reports Analysis Division  
Federal Election Commission  
Washington, DC 20463

Dear Ms. Williamson,

In response to your letter dated November 8, please note that the Lincoln Club of Orange County Federal PAC does not have administrative expenses such as rent or utilities. Our reports disclose payments for salaries and financial analysis.

If you have any questions, please let me know.

Sincerely,

Doy Henley, Treasurer  
Lincoln Club of Orange County Federal PAC  
2050 S. Lyon Street  
Santa Ana, CA 92705

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Doy Henley, Treasurer  
Lincoln Club of Orange County  
Federal PAC  
2050 S Lyon Street  
Santa Ana, CA 92705

NOV 8 2000

Identification Number: C00328401

Reference: Amended July Quarterly Report (4/1/00-6/30/00), received 7/17/00

Dear Mr. Henley:

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 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, supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected 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 verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

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,

*Angel L. Williamson*

Angel L. Williamson  
Reports Analyst  
Reports Analysis Division

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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