



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

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

JUN 23 1999

Identification Number: C00299339

Reference: Amended 1998 30 Day Post-General Report (10/1/98-11/23/98, dated 5/19/99)

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

GENESSEE 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 Michigan Democratic Party State Acct II. The Michigan Democratic Party State Acct II appears to be a non-federal account of the Michigan Democratic State Central Committee/Fed Acct. 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.

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

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toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald L. Averett", with a horizontal line extending from the end of the signature.

Donald L. Averett
Senior Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

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

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FOR LINE NUMBER **115**

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)

Genesee County Democratic Party

A. Full Name, Mailing Address and ZIP Code 9th District Democratic Committee P.O. Box 581 Flint, MI 48501	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation	10/03/98	6000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 6000.00		

B. Full Name, Mailing Address and ZIP Code 9th District Democratic Committee P.O. Box 581 Flint, MI 48501	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation	11/13/98	3345.06
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 9345.06		

C. Full Name, Mailing Address and ZIP Code Democratic Party of the 8th Congressional District P.O. Box 581 Flint, MI 48501	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation	10/30/98	2800.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 2800.00		

D. Full Name, Mailing Address and ZIP Code Michigan Democratic Party 606 Townsend St. Lansing, MI 48933	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation	10/26/98	30000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 30000.00		

E. Full Name, Mailing Address and ZIP Code Michigan Democratic Party State 606 Townsend St Lansing MI 48933	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation	1/28/98	5000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 5000.00		

F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		

G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only) **47145.06**

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 1 OF 1
FOR LINE NUMBER 112

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)

Genesee County Democratic Party

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
<i>Minors Campaign Committee 1009 MANNING FLINT, MI 48503</i>		<i>10/15/98</i>	<i>468.17</i>
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ <i>468.17</i>	
<i>Minors Campaign Committee 1009 MANNING FLINT, MI 48503</i>		<i>10/15/98</i>	<i>750.00</i>
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ <i>1218.17</i>	
<i>3rd District Democratic Club 3021 MARYLAND AVE FLINT, MI 48506</i>		<i>11/2/98</i>	<i>1000.00</i>
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ <i>1000.00</i>	
<i>CITIZENS FOR JOHN CHERRY 4114 ORMA L. AVE ELIOT, MI 48420</i>		<i>11/2/98</i>	<i>750.00</i>
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ <i>750.00</i>	
<i>FRIENDS OF DEBBIE CHERRY 2124 S. BILSON RD BURTON, MI 48519</i>		<i>10/8/98</i>	<i>500.00</i>
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ <i>750.00</i>	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

3468.17

