



MICHIGAN CREDIT UNION LEAGUE LEGISLATIVE ACTION FUND

Post Office Box 5210

Detroit, Michigan 48235

December 8, 1995

Mr. Andy Dodson
Reports Analysis Division
Federal Election Commission
Washington, DC 20483

Dear Mr. Dodson:

In response to your letter dated November 28, 1995 (copy attached), the following is our response.

The Michigan Credit Union Legislative Action Fund (state PAC) and Michigan Credit Union League Legislative Action Fund (federal PAC) held a joint fundraiser during 1994/1995. This was a fundraiser to raise funds for the PACs and was not to support any federal elections or specific candidates.

This joint fundraiser was a grand raffle. The actual date of the raffle drawing was 3/29/95. Following were the expenses incurred for this event.

<u>Item</u>	<u>Date Paid</u>	<u>Amount</u>
Raffle license	8/8/94	\$ 50.00
Viability kits	10/25/94	1,005.72
Ticket printing	12/20/94	4,017.40
Raffle winner prizes	3/31/95	3,500.00
Raffle drum rental	4/20/95	230.00
		<u>\$8,303.12</u>

These expenses were paid by the state PAC until after the grand raffle was held and the calculation was made of the percentage of state and federal receipts received. The federal share of the receipts was 85.3% and the federal PAC reimbursed the state PAC for its share of the expenses which is reflected on the report.

This grand raffle is the last one that will be held due to the fact that the state laws have changed and no longer allow raffles as fundraising events for political action committees.

If you have any questions please contact me.

Sincerely,

Lonnie L. Bone
Treasurer

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463



RQ-2

Lonnie L. Bone, Treasurer
Michigan Credit Union League
Legislative Action Fund
20800 Civic Center Drive
Detroit, MI 48235

NOV 28 1995

Identification Number: C00139279

Reference: Mid-Year Report (1/1/95-6/30/95)

Dear Ms. Bone:

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 B supporting Line 21(b) (pertinent portion(s) attached) discloses \$5,421.95 in disbursements to Michigan Credit Union Legislative Action Fund for the reimbursement of the federal share of Grand Raffle exp. You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information regarding these transactions including the date(s) when the original activity was conducted by the non-federal account. In addition, if any of the disbursements disclosed on Schedule B supporting Line 21(b) were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in-kind contributions on Schedule B supporting Line 23, or as independent expenditures on Schedule E supporting Line 24. 11 CFR §§104.3(b)(3) and 106.1

Although the Commission may initiate legal action regarding the activities conducted by your non-federal account, any clarifying information that you can provide 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

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our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



*Amc
Donn*

Donn Casale
Reports Analyst
Reports Analysis Division

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 01
FOR LINE NUMBER 21b

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 campaign purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
Michigan Credit Union League Legislative Action Fund

995500370010042041518

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Federal Reserve Bank Detroit, MI	1120 pol taxes 1994 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) taxes	3/10/95	135.85
Michigan Credit Union Legislative Action Fund P.O. Box 5210 Detroit, MI 48125	reimbursement for Federal share of Grand Raffle exp. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) expenses	5/2/95	5,421.95
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

5,557.80

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.

Hand Delivered

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and Registration

DATE OF RECEIPT

Received from the Senate Office of Public
Records

DATE OF RECEIPT

Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

J.E.H.

PREPARER

12-13-95

DATE PREPARED

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