



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

April 28, 2006

James Grant, MD, Treasurer  
Michigan Doctors Political Action Committee –  
Michigan State Medical Society  
P.O. Box 769  
East Lansing, MI 48826

**Response Due Date:  
May 30, 2006**

Identification Number: C00001180

Reference: Year-End Report (7/1/05-12/31/05)

Dear Dr. Grant:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-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

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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.

-Your report does not include a Schedule H1 to disclose the ratio for the allocation of certain costs. For State, District and Local party committees, Schedule H1 must be filed in the first report each calendar year that discloses an allocable disbursement and for Separate Segregated Funds and Non-connected committees, in each report that discloses an allocable disbursement for administrative expenses, generic voter drives or public communications that refer to any political party, but do not refer to any clearly identified candidates.

Further, for State, District and Local party committees, all shared administrative, generic voter drive and exempt activity costs incurred during the two-year cycle must be allocated according to the appropriate fixed ratio, unless the federal account elects to pay a higher percentage of its cost. For Separate Segregated Funds and Non-connected committees, administrative expenses, generic voter drive costs and expenses related to public communications referencing any political party committee (but no clearly identified candidates) must be allocated according to a 50% flat minimum federal percentage unless the federal account elects to pay a higher cost. 11 CFR §106.7(d)(2), (d)(3) and 11 CFR §§104.10(b)(1) and 106.6(c)

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-Please amend your report by providing the purpose for each disbursement itemized on Schedule(s) H4 supporting Line(s) 21(a)(i).

-Schedule H4 of your report discloses apparent contributions and transfers to both federal and non-federal committees and organizations (see attached). Please be advised that contributions and transfers to federal committees and/or non-federal committees/organizations do not qualify as shared expenses to be allocated between your federal and non-federal accounts. Transfers to affiliated committees should be disclosed on Schedule B supporting Line 22 of the Detailed Summary Page, 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/organizations on a separate Schedule B supporting Line 29. Any reimbursement from your committee's non-federal account for any portion of this activity is not permissible. 11 CFR §102.5(a)(1)(i)

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.

-Separate Segregated Funds and Nonconnected committees that have established a federal account and a non-federal account may use only funds subject to the prohibitions and limitations of the Act, or they may allocate expenditures for administrative costs, generic voter drives, fundraising programs or events and public communications referencing only a political party between their federal and their non-federal accounts. 11 CFR §106.6(b)

Separate Segregated Funds and Nonconnected committees may pay administrative expenses, costs for generic voter drives and expenses related to public communications referencing any political party from their federal account, or allocate between their federal and non-federal accounts. Committees that choose to allocate these expenses must disclose the allocation ratio to be applied to each category of activity on a Schedule H1. Administrative expenses, generic voter drive costs and expenses related to public communications referencing any political party committee (but no clearly identified candidates) must be paid for with at least 50 percent Federal funds. 11 CFR §106.6(c)

Schedule H2 is used by all political committees to report the allocation ratios of their joint federal and non-federal fundraising events and direct

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candidate support programs. Schedule H2 is filed with each report that discloses a disbursement for allocated activity. Schedule H3 is used by all political committees to report transfers received by the federal account from the non-federal account(s) to pay the non-federal share of allocable expenses.

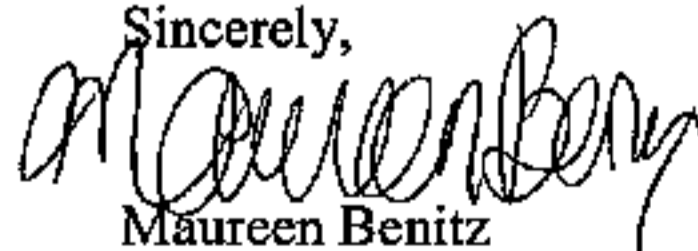
Any expenditures made on behalf of both federal and non-federal candidates (including in-kind contributions and independent expenditures) must be allocated between your committee's federal and non-federal accounts. Schedule H4 is used by all political committees to report payments for allocable expenses. 11 CFR §106.1(a)

Please clarify the procedures you are currently using to pay for allocable expenses. The Commission recommends that you take steps to correct any non-compliance with the regulations. Also, your committee should establish procedures to ensure future compliance with the allocation regulations.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1135.

Sincerely,



Maureen Benitz  
Senior Campaign Finance Analyst  
Reports Analysis Division

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MICHIGAN DOCTORS POLITICAL ACTION COMMITTEE - MICHIGAN STATE  
 MEDICAL SOCIETY

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Recipient Name	Date	Amount
AMPAC	7/13/2005	\$ 250.00
Citizens for Shirley Johnson	7/13/2005	\$ 200.00
Tony Starnas for State Senate	7/13/2005	\$ 200.00
Byrum Leadership Fund	8/1/2005	\$ 350.00
Committee to Elect Dave Hildenbrand	8/1/2005	\$ 150.00
Citizens for Alexander Lipsey	8/1/2005	\$ 250.00
Mark Schauer for State Senate	8/1/2005	\$ 150.00
Laura M. Toy for State Senate	8/1/2005	\$ 200.00
Tony Starnas for State Senate	8/1/2005	\$ 300.00
AMPAC	8/4/2005	\$ 2,350.00
Friends of Jason Allen	8/15/2005	\$ 300.00
Vakle Garcia for State Senate	8/15/2005	\$ 200.00
Knights of the Round Table Leadership PAC	8/15/2005	\$ 150.00
Friends for David Farhat	8/31/2005	\$ 300.00
Ed Gaffney Leadership Fund	8/31/2005	\$ 200.00
AMPAC	9/8/2005	\$ 2,030.00
Citizens to Elect Leslie Mortimer	9/8/2005	\$ 500.00
Ed Gaffney Leadership Fund	9/15/2005	\$ 600.00
Barb Byrum for State Representative	9/15/2005	\$ 100.00
Committee to Elect Gretchen Wh	9/30/2005	\$ 1,000.00
Committee to Elect Kathy Angerer	9/30/2005	\$ 150.00
Michigans Great Southwest Fund	9/30/2005	\$ 1,500.00
Citizens to Elect Leslie Mortimer	10/18/2005	\$ 150.00
Dave Robertson for Rep	10/18/2005	\$ 175.00
Friends of Lisa Wojno	10/18/2005	\$ 125.00
Friends of John Gleason	11/2/2005	\$ 150.00
Supporters of Gary McDowell	11/2/2005	\$ 150.00
AMPAC	11/30/2005	\$ 3,010.00
Committee to Elect Gretchen Wh	11/30/2005	\$ 300.00
Citizens to Elect Bruce Patterson Sen.	12/16/2005	\$ 350.00
Committee to Elect Gretchen Wh	12/16/2005	\$ 150.00
Friends of Morris Hood III	12/16/2005	\$ 150.00

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