FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

June 18, 1998

Scott Haines, Treasurer
Midland County Republican Committee
P.O. Box 100
Midland, MI 48640

Identification Number: C00109116

Reference: Year End Report (7/1/97-12/31/97)

Dear Mr. Haines:

On May 27, 1998, you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

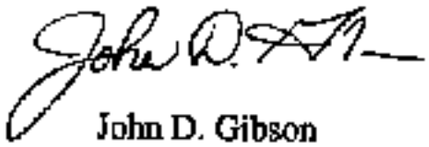
Your May 29, 1998 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-Your letter states that an in-kind contribution was made to Dave Camp for Congress for the rental of office space. You must provide the name and address of the payee for the in-kind contributions, (i.e. the property manager or landlord). An example of the correct way to report such transactions is attached.

If this information is not received by the Commission 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 Scott Francis on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,



John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

4. Itemized Disbursements

When to Itemize Disbursements

Regardless of Amount
The disbursements listed below *must* be itemized, regardless of amount, on Schedule B (or indicated schedule):

- Shared federal/nonfederal *operating expenditures* (itemized on Schedule H4—see Chapter 10);
- *Contributions to candidates* and *political committees*;
- *Coordinated party expenditures* (itemized on Schedule F);
- Loan repayments;
- Loans made by the committee; and
- Transfers to other *party committees* and *party organizations*.

Note that refunds of contributions (Line 26 of the Detailed Summary Page) must be itemized on Schedule B only if the incoming contribution had to be itemized on Schedule A, as explained on page 40.

Other Disbursements: $200 Threshold
A disbursement that does not fall under one of the categories listed above (such as a federal operating expenditure or an *independent expenditure*) must be itemized if it exceeds $200 when aggregated with other disbursements made to the same payee during the calendar year. (Please note that independent expenditures are itemized on Schedule E; see page 42.)

How to Itemize Disbursements

Separate Categories of Disbursements
Before beginning to itemize the committee's disbursements, separate them into the different categories listed on the Detailed Summary Page ("Operating Expenditures," "Contributions to Federal Candidates," etc.; an illustration of a completed Detailed Summary Page appears on page 38). The disbursements in each category must be itemized on a separate Schedule B designated for that category.

Indicate the type of disbursement itemized on a particular Schedule B by entering the corresponding line number from the Detailed Summary Page in the upper right corner of the schedule. The appropriate category of disbursement may also be written at the top of each page.

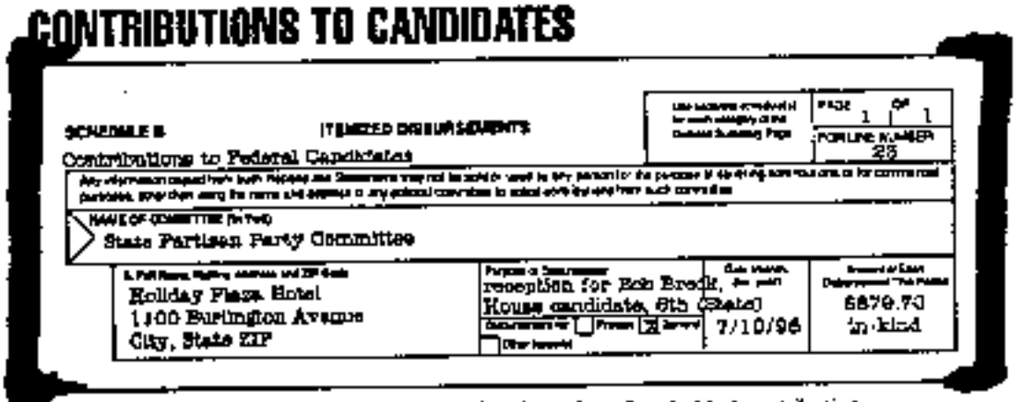
Some categories may require several pages. The total for each category should be entered on the bottom line of the last page for that category.

Itemized Information
Itemized disbursement information includes:

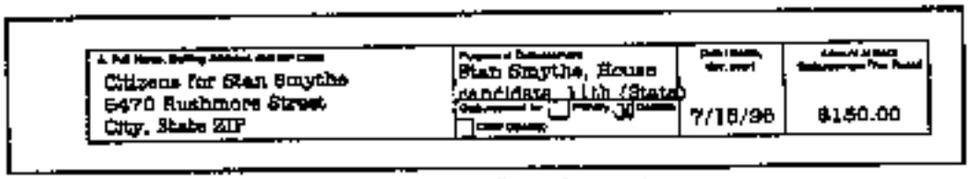
- Name of payee;
- Address of payee;
- Purpose of disbursement (a brief but specific description of why the disbursement was made—see Schedule B instructions and 104.3(b)(3)(i)(B));
- Date of payment; and
- Amount. 104.3(b)(3); 104.9.

Contributions to Candidates: Additional Information
Further information is required when itemizing a contribution to a candidate committee on Schedule B. Include the candidate's name and the office sought (including the state and, if applicable, Congressional district). When itemizing a contribution or loan to a candidate committee, specify the election for which the payment was made by checking the appropriate category in the election designation box. 104.3(b)(3)(v). See illustration.

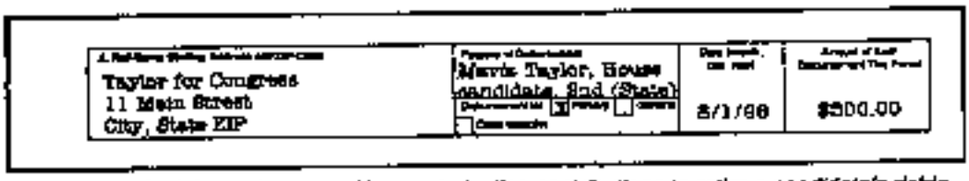
CONTRIBUTIONS TO CANDIDATES


SCHEDULE B ITEMIZED DISBURSEMENTS
PAGE 1 OF 1
Contributions to Federal Candidates
FOR LINE NUMBER 23
NAME OF COMMITTEE (in full)
State Partisan Party Committee
Holiday Plaza Hotel
1100 Burlington Avenue
City, State ZIP
reception for Bob Brodt, House candidate, 6th (State)
7/10/96
$870.70 in-kind

See page 6 for information on how to determine the value of an in-kind contribution.


Citizens for Stan Smythe
5470 Rushmore Street
City, State ZIP
Stan Smythe, House candidate, 11th (State)
7/18/96
$150.00

Itemize contributions to federal candidates regardless of amount.


Taylor for Congress
11 Main Street
City, State ZIP
Mavis Taylor, House candidate, 2nd (State)
8/1/96
$500.00

See page 14 for information on making post-election contributions to retire a candidate's debts.