



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

RQ-2

Jeffrey T. Benton, Treasurer  
Buckeye State PAC  
P.O. Box 29343  
Columbus, OH 43229

MAR 26 2003

Identification Number: C00366781

Reference: October Quarterly Report (7/1/02-9/30/02)

Dear Mr. Benton:

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 one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

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Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-Your report discloses no 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(s) 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.

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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.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions to Federal candidates and committees should be properly disclosed on a separate Schedule B, supporting Line 23 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

A response or 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. 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 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,



Maureen Benitz  
Campaign Finance Analyst  
Reports Analysis Division

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

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

FOR LINE NUMBER:		PAGE 5 / 7	
(check only one)			
<input checked="" type="checkbox"/>	11a	<input type="checkbox"/>	11b
<input type="checkbox"/>	13	<input type="checkbox"/>	14
<input type="checkbox"/>	15	<input type="checkbox"/>	16
<input type="checkbox"/>	17	<input type="checkbox"/>	18

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)  
Buckeye State PAC

Full Name (Last, First, Middle Initial) A. Dwayne Ciaramello		Date of Receipt M M / D D / Y Y Y Y 0 6 / 2 8 / 2 0 0 2
Mailing Address 581 East Johnstown Road City State Zip Code Gehanna OH 43030		Amount of Each Receipt this Period 1000.00
FEC ID number of contributing federal political committee.		
Name of Employer Self Occupation Realtor		Transaction ID: SA11A1.4286
Receipt For: 2002 Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) ▼ Aggregate Year-to-Date ▼ 1000.00		

Full Name (Last, First, Middle Initial) B. Timothy Dearveeja		Date of Receipt M M / D D / Y Y Y Y 0 4 / 0 2 / 2 0 0 2
Mailing Address 4473 Hidden Oaks Lane City State Zip Code Liberty Township OH 45011		Amount of Each Receipt this Period 1000.00
FEC ID number of contributing federal political committee.		
Name of Employer Best Efforts Occupation		Transaction ID: SA11A1.4284
Receipt For: 2002 X Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ 1000.00		

Full Name (Last, First, Middle Initial) C. Mr. John Johnson, II		Date of Receipt M M / D D / Y Y Y Y 0 4 / 2 0 / 2 0 0 2
Mailing Address 3724 Old Worthington Road City State Zip Code Westerville OH 43082		Amount of Each Receipt this Period 5000.00
FEC ID number of contributing federal political committee.		
Name of Employer Sturdy Wall, LLC Occupation President		Transaction ID: SA11A1.4283
Receipt For: 2002 X Primary General Other (specify) ▼ Aggregate Year-to-Date ▼ 5000.00		

MB

SUBTOTAL of Receipts This Page (optional)	7000.00
TOTAL This Period (last page this line number only)	7000.00

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

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

FOR LINE NUMBER:		PAGE 6 of 11	
(check only one)			
<input checked="" type="checkbox"/>	11a	<input type="checkbox"/>	11b
	13		14
<input type="checkbox"/>	11c	<input type="checkbox"/>	12
	15		16
<input type="checkbox"/>		<input type="checkbox"/>	17

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NAME OF COMMITTEE (In Full)  
Buckeye State PAC

**A.** Full Name (Last, First, Middle Initial)  
Mr. Charles Hinson

Mailing Address  
4520 Kitzmiller Road

City State Zip Code  
New Albany OH 43054

FEC ID number of contributing federal political committee.

Name of Employer Occupation  
Retired

Receipt For: 2002  
Primary  General  Other (specify) ▼

Aggregate Year-to-Date ▼  
500.00

Date of Receipt  
M M D D Y Y Y Y  
08 22 2002

Amount of Each Receipt this Period  
500.00

Contribution

Transaction ID: SA11A1.4321

**B.** Full Name (Last, First, Middle Initial)  
Mrs. Lee Hinson

Mailing Address  
7518 Ogden Woods

City State Zip Code  
New Albany OH 43054

FEC ID number of contributing federal political committee.

Name of Employer Occupation  
Hinson LTD Public Relations President

Receipt For: 2002  
Primary  General  Other (specify) ▼

Aggregate Year-to-Date ▼  
500.00

Date of Receipt  
M M D D Y Y Y Y  
08 15 2002

Amount of Each Receipt this Period  
500.00

Contribution

Transaction ID: SA11A1.4323

**C.** Full Name (Last, First, Middle Initial)  
Mr. John Johnson, II

Mailing Address  
8724 Old Worthington Road

City State Zip Code  
Wadsworth OH 43082

FEC ID number of contributing federal political committee.

Name of Employer Occupation  
Sturdy Wall, LLC President

Receipt For: 2002  
Primary  General  Other (specify) ▼

Aggregate Year-to-Date ▼  
5000.00

Date of Receipt  
M M D D Y Y Y Y  
07 05 2002

Amount of Each Receipt this Period  
5000.00

Contribution

Transaction ID: SA11A1.4306

MB

SUBTOTAL of Receipts This Page (optional) ▶ 6000.00

TOTAL This Period (last page this line number only) ▶

