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June 24, 1996

Ms. Debbie Manzano
Reports Analyst
Federal Elections Commission
999 East Street, Northwest
Washington, DC 20463

Re: California Republican Party, FEC ID #C00140590

Dear Debbie:

This letter responds to John Gibson's letter dated June 13, 1996 to Shawn Steele, Treasurer of the California Republican Party ("CRP"). We act as General Counsel to the CRP.

The letter requests that the CRP amend its campaign report covering the period March 7 through March 31, 1996, to better describe payments made to various entities for "voter registrations." As you may recall, the CRP used to describe these payments as "bounty payments" (the term the CRP employs internally when it pays groups fees to register Republican voters). In earlier correspondence, the FEC informed us that the term "bounty payments" did not adequately describe the activity; we chose the term "voter registrations" because we thought it more accurately described the activity. However, as pointed out in Mr. Gibson's letter, this description does not meet the requirements of 11 Code of Federal Regulations section 104.3(b).

After discussing the matter with Amy Reynolds in your office (because you were on vacation), we propose describing these payments in the future as "payments for registration gathering." This description accurately describes the activity, and does not seem to be prohibited by section 104.3(b). Unless we hear from you otherwise, we will assume that this description meets with the FEC's approval.

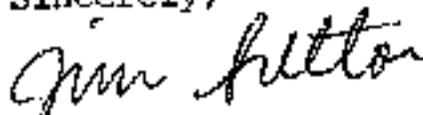
We also discussed with Ms. Reynolds whether the CRP had to amend all of its past campaign reports to reflect this new description. She indicated that amendments would not be required, as long as the CRP sent the FEC a letter explaining the change. By this letter, the CRP is indicating that all amounts for "bounty payments" or "voter registrations" listed on earlier campaign reports were related to "payments to registration

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gathering." All future campaign reports filed by the CRP will use this description.

Please call me immediately if the FEC has any concerns about the CRP's response to Mr. Gibson's letter.

Sincerely,



James R. Sutton

JRS/djf

cc: Shawn Steele, CRP Treasurer
Gu-Lan Chen, CRP Controller

#5263.01B

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