



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20464

RQ-2

Thomas J. Brindley, Treasurer  
Alpena County Democratic Party  
419 South First Street  
Alpena, MI 49707

AUG 23 1995

Identification Number: C00231316

Reference: 1994 Year End Report (10/1/94-12/31/94)

Dear Mr. Brindley:

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:

-It appears that your report erroneously utilized a Schedule H4 for itemizing contributions to federal candidates. Please be advised that Schedule H4 is used only by political committees that allocate expenses between separate federal and non-federal accounts. If your committee has only one account, please provide a Schedule B to support the entry reported on Line 23 of the Detailed Summary Page.

-Your report fails to disclose the federal portion of administrative expenses and generic voter drive costs. A state and local party committee that makes disbursements in connection with federal and non-federal elections shall allocate between its federal and non-federal account all expenses for administrative costs. This includes rent, utilities, office supplies, and salaries, except for those expenses directly attributable to a clearly identified candidate. 11 CFR 106.5 (a)(2)

State and local party committees (except for those that do not hold federal and non-federal elections in the same year) shall allocate their administrative expenses and costs of generic voter drives according to the ballot composition method. Expenses shall be allocated based on the ratio of federal offices expected on the ballot to total federal and non-federal offices expected on the ballot in the next general election to be held in the committee's state or geographic area.

Schedule H2 is used by all political committees to report the allocation ratios of their joint federal and non-federal fundraising events and direct candidate support programs. Schedule H2 is filed with each report that discloses a disbursement for a shared 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 also 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 allocate shared activity. 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.

-The total listed on Line 11(b), Column B of the Detailed Summary Page appears to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Line 11(b), Column B total.

-Please provide the totals for Lines 11(a)(iii) and 19, Columns A and B, of the Detailed Summary Page.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Transfers from affiliated or other party committees should be properly disclosed on a separate Schedule A, supporting Line 12 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 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

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letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Wendy Barkley  
Reports Analyst  
Reports Analysis Division

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