

# Los Angeles County Lincoln Clubs

A Political Action Committee

11001 E. Valley Mall, Suite 206, El Monte, California 91731

Phone (626) 579-7977 • Fax (626) 914-0970

FFEC I.D. 001946 • FEC I.D. C00248658

For the Development and Support of Republican Candidates for Federal and Non-Federal Offices.

February 14, 2003

Ms. Maureen Benitz  
Campaign Finance Analyst  
Federal Election Commission  
Washington DC 20463

Dear Ms. Benitz:

Identification Number: C00248658

Reference: RQ-2/Your letter of 2/5/2003/Oct. Quarterly Report (7/1/02-9/30/02)

You have requested "a response or an amendment" to our original report. Our explanation, which we feel will fully answer your concerns, follows.

Paragraph 1 of Itemization:

Schedules H-3 (pp. 1-2) include \$20,000, the amount transferred at the time. The balance of \$4,442 was transferred October 1, 2002 and is included in the filing for the period October 1-16, 2002.

Paragraph 2 of Itemization:

Regarding more descriptive titles for those receiving PAC disbursements listed on Schedule H-4, I am mailing to the FEC the Amendment reflecting this change, per your request.

Paragraph 3 of itemization:

The "Miscellaneous Electronic Submission" has been filed as instructed and fully explains the lack of administrative expense.

Paragraph 4 of itemization:

The PAC has received no "in-kind Contributions."

Paragraph 5 of itemization:

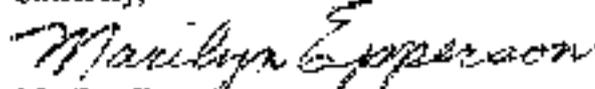
See "Miscellaneous Electronic Submission" filed February 8, 2002 explaining lack of "administrative expenses."

Paragraph 6 of itemization:

Thank you for bringing this to my attention that contributions made to a non-Federal committee should be shown on the Summary, Line 29 for all future reports.

If you have additional concerns, or require further clarification, we shall be pleased to provide it to you.

Sincerely,



Marilyn Epperson

M. Epperson &amp; Associates Accounting

Cc: Douglas R. Boyd, Sr./Treasurer

Board of Governors

Chairman, ROBERT A. VIRTUE • Chairman Emeritus, WILLIAM T. HEISON

Vice Chairman, FOREST TENNYANT • Secretary, SHAWN STEEL • Treasurer, DOUGLAS R. BOYD, SR.

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**MARLYN EPPERSON  
M. EPPERSON & ASSOCIATES  
343 N. CITRUS AVENUE  
LOS ANGELES CA 90038**

**March 5, 2001**

**Federal Election Commission  
999 E Street N.W.  
Washington, D.C. 20463**

**Att: California Lincoln Clubs Federal PAC  
I.D. # C00248658  
Letter RQ-2, Feb. 21, 2001/Amended 12 Day Pre-General Report  
(10/1-10/18/00) received 11/30/00, and  
Letter RQ-2, Feb. 21, 2001/October Quarterly Report (7/1-9/30/00)**

**Dear Mrs. Wilkens:**

**Enclosed, with copies of your two letters, are the amendments requested, and a schedule inre the transfers of funds from a nonfederal account. We hope we have answered your questions.**

**Please note that in the final report for year 2000 (period ending 12/31/00) the refunds of contributions made earlier in the year changed the percentage prorata for Generic Voter Drive and an additional transfer of nonfederal funds in the amount of \$2,800 were required to be made . The transfer was made in January, 2001 and will be reported in the first report for the year 2001.**

**We hope the enclosed material answers all the questions. If there are other questions, please contact us. Thank you.**

**Sincerely,**

**M. Epperson & Associates,  
Accountants for California Lincoln  
Clubs Federal PAC**

**Cc: Douglas R. Boyd, Sr., Treasurer**



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Douglas R. Boyd, Sr., Treasurer  
Los Angeles County Lincoln Clubs Political Action  
Committee  
343 N. Citrus Avenue  
Los Angeles, CA 90036

FEB 05 2003

Identification Number: C00248658

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

Dear Mr. Boyd:

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:

-On Schedule H3 supporting Line 18 of the Detailed Summary Page, Lines i), ii)e), and iii)e) for the transfer-in from the "Los Angeles County Lincoln Clubs PAC (State PAC)" do not add up to the 8/30/02 and 9/20/02 transfers of \$8783.00 and \$11,217, respectively. Please amend your report to correct this discrepancy. 11 CFR §104.10

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule H4 of your report to clarify the following description(s): "Professional services". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-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. Each separate segregated fund and non-connected committee utilizing separate federal and non-federal accounts is required to allocate any administrative expenses between the accounts in proportion to the FUNDS EXPENDED METHOD

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derived from FEC Schedule H1. A Schedule H1 must be filed with the first FEC FORM 3X filed at the beginning of each two-year election cycle. 11 CFR §106.6(c)

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.

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 provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

-For future reporting, please be advised that only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 29.

A 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 letter. Electronic filers must file amendments (to include statements, designation 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 Bagitz  
Campaign Finance Analyst  
Reports Analysis Division

Federal Election Commission

## ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> First Class Mail	POSTMARKED 2-18-03
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<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other ( Specify):	Postmarked <hr/> and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>[Signature]</i>	2-20-03
PREPARER	DATE PREPARED