



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Paul A. Strabala, Treasurer
Elections Committee Of The
County of Orange
1700 East Garry, Ste. 108
Santa Ana, CA 92705

JAN 17 1995

Identification Number: C00192302

Reference: October Quarterly Report (7/1/94-9/30/94)

Dear Mr. Strabala:

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:

-The Summary Page discloses \$21,383.98 and \$37,942.62 for Columns A and B on Line 7, but the Detailed Summary Page shows the Line 30 totals to be \$22,581.09 and \$48,636.47 for Columns A and B respectively. These figures should be the same. Please amend your report accordingly.

-For your information, all contributions received that aggregate \$200 or less per individual for the calendar year should be reported on Line 11(a)(ii). Contributions received aggregating over \$200 per individual for the calendar year should be reported on Line 11(a)(i) and itemized on Schedule A.

-The identification of each contributor, including the person's occupation and name of employer, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry lacking a contributor's occupation and name of employer.

Note: If your committee has made attempts, either by a written request or by an oral request documented in writing to obtain this information from each contributor, your committee may have exercised "best efforts." Under revised 11 CFR 104.7(b), such effort shall consist of an initial clear and conspicuous request for the name, mailing address, occupation, and name of employer of each individual who has contributed over \$200 in the calendar year which informs the contributor that the reporting of such information is

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required by law. If necessary, your committee must make a written follow-up request or an oral follow-up request documented in writing, within thirty days with no additional solicitation. Subsequently, the committee should report any changes provided by the contributor or any additional information which is in the committee's records. If you believe that your committee satisfies the "best efforts" provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contribution information. Clarification regarding "best efforts" should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. 11 CFR §104.3(a)(4)(i)

-Schedule H4 discloses a disbursement(s) which is categorized as a fundraising expense(s); however, a Schedule B2 has not been filed to disclose the allocation ratio. All committees are required to allocate the direct costs of each fundraising event in which the committee collects both federal and non-federal funds. The costs are allocated according to the funds received ratio and reported on Schedule H2. 11 CFR §§106.5(f) and 106.6(d). Please file a Schedule H2 to disclose the ratio for the fundraising event(s).

-Your calculations for administrative/voter drive and fundraising EVENT YEAR-TO-DATE totals are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year within the category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct administrative/voter drive and fundraising EVENT YEAR-TO-DATE totals.

-Your report discloses activity that falls outside the reporting period. Please amend this report by including only the financial transactions that occurred between 7/1/94 and 9/30/94. Any activity occurring outside this reporting period should be included in the appropriate report(s). 2 U.S.C. §434(b)

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-On Schedule H3 supporting Line 18 of the Detailed Summary Page, you have failed to include a DATE OF RECEIPT for the \$175 transfer-in from the Elections Committee of the County of Orange - State PAC. Please amend your report to include this date. 11 CFR §104.10

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 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,



Neil Evans
Reports Analyst
Reports Analysis Division

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