



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-1

August 6, 2008

Charles D. Benham, Treasurer
Newaygo County Democratic Executive
Committee
65 State Road
P.O. Box 146
Newaygo, MI 49337

**Response Due Date:
September 8, 2008**

Identification Number: C00452854

Reference: Statement of Organization, received 7/16/08

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 items:

1. Your Statement of Organization indicates on Line 5(d) that you are a "state" committee for the Democratic Party. However, it appears that your committee may be a "subordinate" party committee. A subordinate committee is defined as the organization which, by virtue of the bylaws of a political party, is responsible for the day-to-day operation of such political party at the city, county, neighborhood, ward, district, or precinct level. 11 C.F.R. §100.14(b) and (c). If your committee is in fact a subordinate committee, please amend your Statement of Organization to indicate "SUB" on Line 5(d).

2. Your Statement of Organization indicates that your committee may be a local party committee. However, Line 6 of your Statement of Organization has been left blank, which indicates that your committee is not affiliated with the Michigan Democratic State Central Committee. However, pursuant to 11 CFR §110.3(b)(3), all contributions made by political committees established, financed, maintained, or controlled by the State party committee and by subordinate State party committees shall be presumed to be made by one political committee.

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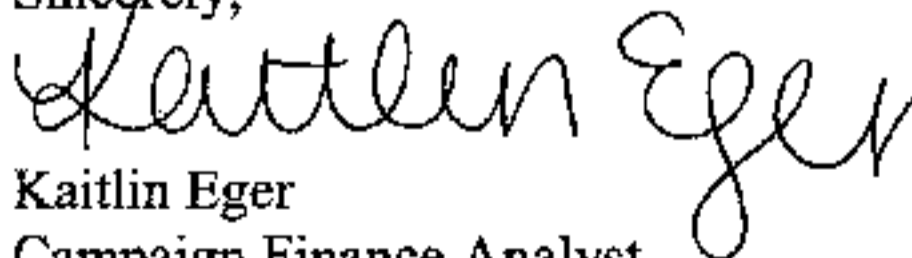
This presumption shall not apply if the political unit in question has not received funds from any other political committee established, financed, maintained, or controlled by any party unit and the political committee of the party unit in question does not make contributions in cooperation, consultation or concert with, or at the request or suggestion of any other party unit or political committee established, financed, maintained, or controlled by another party unit. Further, 11 CFR §100.5(e)(4) defines a party committee as a political committee which represents a political party and is part of the official party structure at the national, State, or local level.

Please clarify whether your committee is, in fact, independent from the Michigan Democratic State Central Committee. Further, any affiliated committee must be identified on your Statement of Organization. If there are no other committees or organizations with which you share control or financing, please indicate "None" on Line 6. If you do share control or financing with other committees or organizations, please list their names, addresses, and relationships on Line 6. 11 CFR §102.2

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

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 should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694- 1143.

Sincerely,



Kaitlin Eger
Campaign Finance Analyst
Reports Analysis Division



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