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Dec 10 11 24 AM '97

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GILBERT T. ADAMS, III
DAVID L. TOLIN

TELEPHONE: (409) 835-3000
TELECOPIER: (409) 832-8182

December 12, 1997

Richard Ng
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E. St. N.W.
Washington, D.C. 20463

Re: Response to you letter of December 3. (Copy Attached)

Dear Mr. Ng,

In response to your letter of December 3, please accept the following as our timely response.

Attached is a copy of schedule H1 that was originally filed with the 07/01/96 through 09/30/96 report. This H1 was for allocations incurred during the period of 1995 - 1996. This schedule is marked # 1. Also attached is a copy of schedule H1 that was originally filed with the 11/21/96 through 12/31/96 report. This schedule is marked # 2. This H1 was for allocations incurred during the period of 1997 - 1998. I was not aware that it was required to file the 1997 - 1998 H1 again with the Mid-Year 1997 report. Notations were made in the "purpose / event" column on schedule H4 as to which period allocations made applied to, on the Mid Year 1997 report.

In regard to the event year-to-date calculations being incorrect. I am afraid I do not see the error. An amended report for 11/21/96 through 12/31/96 is attached (marked # 3). The ending balance on this report appears to correspond with the starting balance on the Mid-Year 1997 report. Please advise if I am incorrect. Perhaps you were not aware of the amended 11/21/96 through 12/31/96 report.

Please address any additional correspondence regarding this matter to my attention at the address on this letterhead. I may be reached at (409) 835-3000 if you wish to call.

Sincerely,



Roger Westbrook
Accountant



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

DEC 3 1997

Gilbert T. Adams Jr., Treasurer
Jefferson County Democratic Party
1855 Calder Avenue
Beaumont, TX 77701

Identification Number: C00253880

Reference: Mid-Year Report (1/1/97-6/30/97)

Dear Mr. Adams:

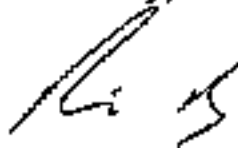
This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report does not include a Schedule H1 to disclose the ratio for the allocation of administrative and generic voter drive costs. This ratio is determined at the beginning of each two-year election cycle. All shared administrative and generic voter drive costs incurred during the two-year cycle must be allocated according to this ratio, unless the federal account elects to pay a higher percentage of its cost. 11 CFR §106.5(b)(2), (d)(1), (d)(2) and 11 CFR §§104.10(b)(1)(ii)(B) and 106.6(c)

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive 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 EVENT YEAR-TO-DATE totals.

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,

A handwritten signature in black ink, appearing to read 'Richard Ng', written in a cursive style.

Richard Ng
Reports Analyst
Reports Analysis Division

**METHOD OF ALLOCATION FOR SHARED FEDERAL
AND NON-FEDERAL ADMINISTRATIVE EXPENSES
AND GENERIC VOTER DRIVE COSTS**

#1

NAME OF COMMITTEE
Jefferson County Democratic Party

NATIONAL PARTY COMMITTEES

FIXED FEDERAL PERCENTAGE (CHECK THE APPROPRIATE LINE AND ENTER % IN BOX TO RIGHT) %
 PRESIDENTIAL YEAR (65%)
 ALL OTHER YEARS (60%)

HOUSE AND SENATE PARTY CAMPAIGN COMMITTEES

MINIMUM FEDERAL PERCENTAGE (65%) (IF CHECKED, ENTER % IN BOX TO RIGHT) %
 OR
 FUNDS EXPENDED:
 • ESTIMATED DIRECT CANDIDATE SUPPORT — FEDERAL %
 • ESTIMATED DIRECT CANDIDATE SUPPORT — NON-FEDERAL %
 ADJUSTMENTS TO FUNDS EXPENDED:
 ACTUAL DIRECT CANDIDATE SUPPORT — FEDERAL \$ %
 ACTUAL DIRECT CANDIDATE SUPPORT — NON-FEDERAL \$

NOTE: FUNDS EXPENDED MUST BE USED IF THE FEDERAL PROPORTION IS GREATER THAN 65% IN ANY YEAR.

SEPARATE SEGREGATED FUNDS AND NON-CONNECTED COMMITTEES

FUNDS EXPENDED:
 • ESTIMATED DIRECT CANDIDATE SUPPORT — FEDERAL %
 • ESTIMATED DIRECT CANDIDATE SUPPORT — NON-FEDERAL %
 ADJUSTMENTS TO FUNDS EXPENDED:
 ACTUAL DIRECT CANDIDATE SUPPORT — FEDERAL \$ %
 ACTUAL DIRECT CANDIDATE SUPPORT — NON-FEDERAL \$

STATE AND LOCAL PARTY COMMITTEES

BALLOT COMPOSITION

CHECK ALL OFFICES APPEARING ON THE NEXT GENERAL ELECTION BALLOT:

	NUMBER OF POINTS
1. PRESIDENT <input checked="" type="checkbox"/> (1 POINT)	1
2. U.S. SENATE <input checked="" type="checkbox"/> (1 POINT)	1
3. U.S. CONGRESS <input checked="" type="checkbox"/> (1 POINT)	1
4. SUBTOTAL — FEDERAL (ADD 1, 2, AND 3)	3
5. GOVERNOR <input type="checkbox"/> (1 POINT)	
6. OTHER STATEWIDE OFFICE(S) <input checked="" type="checkbox"/> (1 OR 2 POINTS)	2
7. STATE SENATE <input type="checkbox"/> (1 POINT)	
8. STATE REPRESENTATIVE <input checked="" type="checkbox"/> (1 POINT)	1
9. LOCAL CANDIDATES <input checked="" type="checkbox"/> (1 OR 2 POINTS)	2
10. EXTRA NON-FEDERAL POINT <input checked="" type="checkbox"/> (1 POINT)	1
11. SUBTOTAL — NON-FEDERAL (ADD 5, 6, 7, 8, 9, AND 10)	6
12. TOTAL POINTS (LINE 4 PLUS LINE 11)	9

FEDERAL ALLOCATION = LINE 4 DIVIDED BY LINE 12 33.3333 %

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 type="checkbox"/> First Class Mail	POSTMARKED
<input checked="" type="checkbox"/> Registered/Certified Mail	POSTMARKED 12-12-97
<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 and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>SES</i> PREPARER	12-19-97 DATE PREPARED