



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

Paul A. Strabala, Treasurer
Elections Committee of the County
of Orange
1700 East Garry, Suite 108
Santa Ana, CA 92705

NOV 30 1994

Identification Number: C00192302

Reference: Amended Mid-Year Report (1/1/93-6/30/93) dated
9/19/94

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 beginning cash balance of this report should equal the ending balance of your 1992 Year End report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$4,540 in itemized individual contributions. The sum of the entries itemized on Schedule A, however, indicates the total to be \$4,045. Please amend your report to clarify the discrepancy.

-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.

-Your calculations for administrative/voter drive 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.

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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 EVENT YEAR-TO-DATE totals.

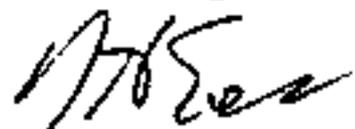
-Please amend your report by providing the amount for each disbursement itemized on Schedule H4 supporting Line 21(a).

-Contributions to non-federal committees do not qualify as shared expenses which may be allocated between your federal and non-federal accounts. Contributions to non-federal committees should either be wholly paid for by the federal account, disclosed on a Schedule B for Line 29 of the Detailed Summary Page, or wholly paid for by the non-federal account. However, your Schedules H2, H3 and H4 disclose allocation of activity towards the non-federal committees of Friends of Tom Riley and Friends of Harriett Weider. For your information, direct candidate support activities are allocable activities and include expenditures made on behalf of more than one clearly identified federal candidate, for example, publications or broadcast communication. 11 CFR §106.1(a)

The Commission recommends that you immediately transfer the \$400 received by your federal account on 5/25/93 related to allocating contributions (i.e., "direct candidate support") to non-federal committees back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

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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