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June 26, 2000

Mr. Scott Walker
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

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FEC MAIL ROOM
2000 JUN 29 P 2:56

RE: **Lincoln Club of Northern California Federal PAC, C00148882**

Dear Mr. Walker:

Thank you for your letter of June 14, 2000, addressed to Mr. Bob Petersen, Treasurer of the Lincoln Club of Northern California Federal PAC. I am general counsel for the Club and its PACs. You raised a question regarding the transfers from non-federal account sources during the reporting period July 1 through December 31, 1999. Specifically, your letter suggests that these transfers might be excessive since, during the reporting period, the transfers were in excess of the non-federal share of operating expenditures for the same reporting period.

In our review of the committee's records, we believe that the non-federal committee made transfers that were correct and permissible. In general, the Club's non-federal account transfers its share of allocable expenses 25 to 30 days after the month in which they were incurred. In other words, June's allocable expenses would be transferred in July; July's in August, etc. Please see the attached allocation sheets for this reporting period.

The discrepancy mentioned in your letter resulted from one event and one procedure that caused the amounts in column A for line 18 to exceed the amount reported in column A of line 21a(ii). Specifically, on October 1, 1999, the Lincoln Club of Northern California Federal PAC changed from a non-connected committee to a separate segregated fund of the Lincoln Club of Northern California, when the latter became a non-profit organization organized under IRC Section 501(a) and operated as a social welfare organization under IRC

501(c)(4). As a result, calculating allocable operating expenditures ceased on September 30, 1999.

This resulted in three months of allocable expenditures and four months of transfers. I would also draw your attention to the fact that the amount listed for column B for line 21a(ii) is less than the column B amount for line 18.

If I can provide any further information to you, please do not hesitate to call me.

Sincerely,

A handwritten signature in cursive script that reads "Russell H. Miller". The signature is written in black ink and is positioned above the printed name and title.

Russell H. Miller
Attorney at Law

Enclosures

cc: Mr. Robert A. Petersen
Ms. Lopa Mehrotra

**Lincoln Club of Northern California
Monthly Allocable Expenses**

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2000 JUN 29 P 2:56

JUNE 1999

DATE	ITEM	CATEGORY	AMOUNT	
6/29/99	HELEN ROBISON	ANAT. CAMP.	\$100.00	ALLOC
6/29/99	MARCI DRAGUN	ANAT. CAMP.	\$10.72	ALLOC
6/29/99	MAUREEN RYAN	ANAT. CAMP.	\$180.78	ALLOC
6/3/99	PETERSEN ASSOCIATES	COPIES & POSTAGE	\$372.00	ALLOC
6/3/99	LAW OFFICES OF RUSSELL MILLER	LEGAL	\$404.52	ALLOC
6/22/99	FRED LOWELL	MEETINGS	\$232.11	ALLOC
6/22/99	SHARON LAND CO.	MEETINGS	\$75.00	ALLOC
6/24/99	TRADER VIC'S	MEETINGS	\$500.00	ALLOC
6/29/99	THE SUNDECK RESTAURANT	MEETINGS	\$976.85	ALLOC
6/3/99	NATIONAL JOURNAL GROUP	MISC.	\$30.75	ALLOC
6/3/99	MCWHORTER'S	OFFICE SUPPLIES	\$85.24	ALLOC
6/15/99	KINKO'S	PRINTING	\$158.92	ALLOC
6/3/99	PETERSEN ASSOCIATES	RENT	\$1305.00	ALLOC
6/30/99	MARCI DRAGUN	SALARY	\$1400.00	ALLOC
6/30/99	MAUREEN RYAN	SALARY	\$5875.00	ALLOC
6/28/99	AT&T	TELEPHONE	\$29.98	ALLOC
6/29/99	MAUREEN RYAN	TELEPHONE	\$19.95	ALLOC
6/29/99	PACIFIC BELL	TELEPHONE	\$100.68	ALLOC
6/22/99	STATE COMP. INSUR. FUND	WORKERS COMP	\$409.20	ALLOC
TOTAL ALLOCABLE EXPENSE:			\$12,046.44	
STATE TO REIMBURSE FED:			\$8,432.51	

<p align="center">LINCOLN CLUB OF NORTHERN CALIFORNIA - STATE 3000 SAND HILL RD., BLDG. 3, STE. 140 MENLO PARK, CA 94025</p>		<p>1985</p>
<p>PAY TO THE ORDER OF <u>Lincoln Club - Fed</u></p>	<p>DATE <u>July 22, 1999</u></p>	<p>11-24 21000</p>
<p><u>Eight Thousand Four hundred thirty two and 51/100</u></p>		<p>\$ <u>8432.51</u></p>
<p align="center">SHARON HEIGHTS OFFICE WELLS FARGO BANK 325 SHARON PARK DRIVE, MENLO PARK, CA 94025</p>		
<p>FOR <u>STATE REIMB. FED</u></p>	<p><i>[Signature]</i></p>	
<p align="center">⑈001985⑈ ⑆121000248⑆0233 037787⑈</p>		

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Craft 6/17/99

**Lincoln Club of Northern California
Monthly Allocable Expenses**

JULY 1999

DATE	ITEM	CATEGORY	AMOUNT	
7/13/99	KINKO'S	ANAT. CAMP.	\$154.58	108.21 ALLOC
7/27/99	SHARON LAND CO.	ANAT. CAMP.	\$75.00	57.50 ALLOC
7/27/99	THE SUNDECK RESTAURANT	ANAT. CAMP.	\$1281.39	861.97 ALLOC
7/1/99	PETERSEN ASSOCIATES	COPIES & POSTAGE	\$287.01	200.91 ALLOC
7/31/99	MAUREEN RYAN	ED EXP. & TELEPHONE	\$73.87	51.57 ALLOC
7/9/99	LAW OFFICES OF RUSSELL MILLER	LEGAL	\$3732.48	2622.72 ALLOC
7/9/99	LAW OFFICES OF RUSSELL MILLER	LEGAL	\$497.55	306.29 ALLOC
7/22/99	BERNARDUS LODGE	MEETINGS	\$1000.00	700.00 ALLOC
7/13/99	CALIFORNIA JOURNAL	MISC.	\$39.95	27.97 ALLOC
7/27/99	CGRAFX	NEWSLETTER	\$384.80	255.36 ALLOC
7/13/99	MCWHORTERS	OFFICE SUPPLIES	\$38.27	26.79 ALLOC
7/1/99	PETERSEN ASSOCIATES	RENT	\$1305.00	913.50 ALLOC
7/30/99	MARCI DRAGUN	SALARY	\$1400.00	980.00 ALLOC
7/30/99	MAUREEN RYAN	SALARY	\$5875.00	3972.50 ALLOC
7/27/99	PACIFIC BELL	TELEPHONE	\$77.88	54.52 ALLOC
7/30/99	AT&T	TELEPHONE	\$35.64	24.75 ALLOC
	TOTAL ALLOCABLE EXPENSE:		\$15,928.20	
	STATE TO REIMBURSE FED:		\$11,149.74	

1999

**LINCOLN CLUB
OF NORTHERN CALIFORNIA - STATE**
3000 SAND HILL RD., BLDG. 3, STE. 140
MENLO PARK, CA 94026

DATE Aug. 31, 1999

PAY TO THE ORDER OF Lincoln Club - Fed \$ 11,149.74

Eleven Thousand one hundred forty nine and 74/100 DOLLARS

SHARON HEIGHTS OFFICE
WELLS FARGO BANK
325 SHARON PARK DRIVE, MENLO PARK, CA 94026

FOR State Reim Fed

[Signature]

⑈001989⑈ ⑆1210002680233037787⑈

8/10/99

Craft & Ink
DEVELOPMENT

**Lincoln Club of Northern California
Monthly Allocable Expenses**

AUGUST 1999

DATE	ITEM	CATEGORY	AMOUNT	
8/10/99	THE STONECREEK GROUP	ANAT. CAMP.	\$500.00	ALLOC
8/2/99	PETERSEN ASSOCIATES	COPIES & POSTAGE	\$363.19	ALLOC
8/31/99	MAUREEN RYAN	ED EXP. & TELEPHONE	\$158.31	ALLOC
8/12/99	ALL WEST INSURANCE BROKERS	INSURANCE	\$829.38	ALLOC
8/12/99	LAW OFFICES OF RUSSELL MILLER	LEGAL	\$555.57	ALLOC
8/12/99	OMEGA PRINTING	NEWSLETTER	\$465.75	ALLOC
8/12/99	MCWHORTERS	OFFICE SUPPLIES	\$98.45	ALLOC
8/12/99	KINKO'S	PRINTING	\$110.78	ALLOC
8/12/99	OMEGA PRINTING	PRINTING	\$352.13	ALLOC
8/2/99	PETERSEN ASSOCIATES	RENT	\$1305.00	ALLOC
8/31/99	MARCI DRAGUN	SALARY	\$1400.00	ALLOC
8/31/99	MAUREEN RYAN	SALARY	\$6875.00	ALLOC
8/31/99	PACIFIC BELL	TELEPHONE	\$81.18	ALLOC
8/31/99	AT&T	TELEPHONE	\$41.28	ALLOC
	TOTAL ALLOCABLE EXPENSE:		\$11,926.00	
	STATE TO REIMBURSE FED:		\$8,348.20	


<p align="center">LINCOLN CLUB OF NORTHERN CALIFORNIA - STATE 3000 SAND HILL RD., BLDG. 3, STE. 140 MENLO PARK, CA 94025</p>		<p>1991</p>
<p>PAY TO THE ORDER OF <u>Lincoln Club Fed</u></p>		<p>DATE <u>Sept 21, 1999</u> <small>11-28 121000</small></p>
<p><u>Eight Thousand three hundred forty eight and 20/100</u></p>		<p>\$ <u>8348.20</u></p>
<p>SHARON HEIGHTS OFFICE WELLS FARGO BANK 325 SHARON PARK DRIVE, MENLO PARK, CA 94025</p>		<p>DOLLARS <input checked="" type="checkbox"/></p>
<p>FOR <u>STATE REIM FED</u></p>		<p><i>Robert R. [Signature]</i></p>
<p>⑈001991⑈ ⑆12100024810233 037787⑈</p>		

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**Lincoln Club of Northern California
Monthly Allocable Expenses**

SEPTEMBER 1999

DATE	ITEM	CATEGORY	AMOUNT		
9/1/99	PETERSEN ASSOCIATES	COPIES & POSTAGE	\$172.67	✓ + 0	ALLOC
9/30/99	MAUREEN RYAN	ED EXP. & TELEPHONE	\$43.45	✓ + 0	ALLOC
9/7/99	LAW OFFICES OF RUSSELL MILLER	LEGAL	\$453.07	✓ + 0	ALLOC
9/21/99	OMEGA PRINTING	PRINTING	\$243.73	✓ + 0	ALLOC
9/3/99	MCWHORTER'S	OFFICE SUPPLIES	\$46.93	✓ + 0	ALLOC
9/21/99	ALL WEST INSURANCE BROKERS	INSURANCE	\$937.50	✓ + 0	ALLOC
9/1/99	PETERSEN ASSOCIATES	RENT	\$1305.00	✓ + 0	ALLOC
9/30/99	MARCI DRAGUN	SALARY	\$1400.00		ALLOC
9/30/99	MAUREEN RYAN	SALARY	\$5875.00		ALLOC
9/23/99	PACIFIC BELL	TELEPHONE	\$82.93	✓ + 0	ALLOC
9/30/99	AT&T	TELEPHONE	\$38.31	✓ + 0	ALLOC
9/1/99	BERNARDUS LODGE	MEETINGS	\$2037.32	✓ + 0	ALLOC
9/3/99	TRADER VICS	MEETINGS	\$290.40	✓ + 0	ALLOC
9/14/99	ALL SEASONS CATERING	MEETINGS	\$114.00	✓ + 0	ALLOC
14					
	TOTAL ALLOCABLE EXPENSE:		\$12,840.31		
	STATE TO REIMBURSE FED:		\$8,888.22		

LINCOLN CLUB OF NORTHERN CALIFORNIA - STATE		1996
<small>3500 SAND HILL RD., BLDG. 3, STE. 140 MENLO PARK, CA 94025</small>		<small>11-24 121018</small>
PAY TO THE ORDER OF	<u>Lincoln Club - Fed</u>	DATE <u>Oct 25, 1999</u>
		\$ <u>8988.22</u>
	<u>Eight Thousand nine hundred eighty eight and 22/100</u>	DOLLARS <input type="checkbox"/> <input type="checkbox"/>
<small>SHARON HEIGHTS OFFICE</small> WELLS FARGO BANK <small>325 SHARON PARK DRIVE, MENLO PARK, CA 94025</small>		
FOR	<u>State Reim Fed</u>	
⑈001996⑈ ⑆12100024800233 037787⑈		

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FEC FILE 12/19/99

10/25/99

Federal Election Commission

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

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