



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Douglas R. Boyd, Sr., Treasurer  
California Lincoln Clubs Fed PAC  
343 N. Citrus Avenue  
Los Angeles, CA 90036

DEC 9 1998

Identification Number: C00248658

Reference: October Quarterly Report (7/1/98-9/30/98)

Dear Mr. Boyd:

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:

-Please provide a Schedule A to support the entry disclosed on Line 11(c) of the Detailed Summary Page. All contributions from political committees must be itemized on Schedule A regardless of the amount. 2 U.S.C. §434(b)(3)(B)

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the total EVENT YEAR-TO-DATE amount for a payment(s) to the 60<sup>th</sup> AD Republican Central Committee, the 44<sup>th</sup> AD Republican Central Committee and the Glendora Republican Club. Please amend your report to include the missing EVENT YEAR-TO-DATE total(s).

-Please clarify all expenditures made for direct candidate support on Schedule H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B supporting Line 23 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-A political committee that has established a federal account and a non-federal account must allocate between its federal and non-federal account

all expenses for administrative costs, generic voter drives and fundraising programs or events. 11 CFR §106.6(b)(2)

Separate Segregated Funds and Nonconnected committees must report the estimated percentages of their direct federal and non-federal candidate support for a two-year election cycle by filing a Schedule H1. To calculate the allocation ratio for administrative and generic voter drive costs, nonconnected committees use the funds expended method. 11 CFR §106.6(c)(1)

Party committees must allocate any administrative expenses between the federal and non-federal accounts in proportion to the ballot composition method derived from FEC Schedule H1. 11 CFR §106.5

Schedule H2 is used by all political committees to report the allocation ratios of their joint federal and non-federal fundraising events and direct candidate support programs. Schedule H2 is filed with each report that discloses a disbursement for a shared activity. Schedule H3 is used by all political committees to report transfers received by the federal account from the non-federal account(s) to pay the non-federal share of allocable expenses.

Any expenditures made on behalf of both federal and non-federal candidates (including in-kind contributions, independent expenditures and coordinated expenditures) must also be allocated between your committee's federal and non-federal accounts. Schedule H4 is used by all political committees to report payments for allocable expenses. 11 CFR §§106.1(a) and 106.5

Please clarify the procedures you are currently using to allocate shared activity. The Commission recommends that you take steps to correct any non-compliance with the regulations. Also, your committee should establish procedures to ensure future compliance with the allocation regulations.

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) 694-1130.

Sincerely,

A handwritten signature in cursive script that reads "Andrea Wilkens". The signature is written in black ink and is positioned above the typed name and title.

Andrea Wilkens  
Reports Analyst  
Reports Analysis Division

