



MICHIGAN LICENSED BEVERAGE ASSOCIATION®

Retailers dedicated to the responsible sale and service of beverage alcohol

March 28, 2008

Ms. Jodi Winship
Senior Campaign Finance Analyst
Federal Election Commission
999 E. Street NW
Washington, DC 20463

Via Certified Mail # 7006 2150 0004 3566 5578

RE: C00433839

Dear Ms. Winship:

I am writing in reply to your letter dated March 12, 2008 regarding the relationship between TAP Political Action Committee (TAPPAC) and the Michigan Licensed Beverage Association (MLBA).

Please be advised that the MLBA is a Michigan based corporation which has been granted non-profit status as a 501(c)(6) corporation by the Internal Revenue Service. The MLBA is a trade association for liquor licensees in the state of Michigan that in 2007 formed as a connected committee, TAPPAC.

As requested, enclosed please find an amended FEC Form 1, Statement of Organization that is correcting item six and per regulation, the name of the PAC to:

**Michigan Licensed Beverage Association TAP Political Action Committee
(MLBA TAPPAC)**

Thank you and please feel free to contact either myself or the Assistant Treasurer, Lance Binoniemi at 1-517-374-9611 should you have any questions or need any additional information.

Sincerely,

Thomas J. Jones
Treasurer

Enclosure

RECEIVED
FEC MAIL CENTER
2008 APR -9 AM 11:09

56527965082



920 N. FAIRVIEW, LANSING, MICHIGAN 48912
(517) 374-9611 (800) 292-2896 FAX (517) 374-1165
Voice Mail (877) 292-2896 Web Site: <http://www.mlba.org>



FEC FORM 1

STATEMENT OF ORGANIZATION

RECEIVED
FEC MAIL CENTER

2008 APR -9 AM 11:10

Office Use Only

1. NAME OF COMMITTEE (in full)



(Check if name is changed)

Example: If typing, type over the lines.

12FE4M5

Michigan Licensed Beverage Association
TAP Political Action Committee (MLBA TAPPAC)

ADDRESS (number and street)

920 N Fairview Ave



(Check if address is changed)

Lansing

MI

48912

CITY

STATE

ZIP CODE

COMMITTEE'S E-MAIL ADDRESS

COMMITTEE'S WEB PAGE ADDRESS (URL)

COMMITTEE'S FAX NUMBER

517-374-1165

2. DATE

03 28 2008

3. FEC IDENTIFICATION NUMBER

C00433839

4. IS THIS STATEMENT



NEW (N)

OR



AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Thomas J. Jones

Signature of Treasurer

Date

03 28 2008

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office Use Only

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-694-1100

FEC FORM 1
(Revised 12/2007)

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5. TYPE OF COMMITTEE

Candidate Committee:

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate _____

Candidate Party Affiliation _____ Office Sought: House Senate President State _____ District _____

- (c) This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate _____

Party Committee:

- (d) This committee is a _____ (National, State or subordinate) committee of the _____ (Democratic, Republican, etc.) Party.

Political Action Committee (PAC):

- (e) This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:
 - Corporation Corporation w/o Capital Stock Labor Organization
 - Membership Organization Trade Association Cooperative
- (f) This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)

In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

Joint Fundraising Representative:

- (g) This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h) This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

1. _____ FEC ID number C
2. _____ FEC ID number C
3. _____ FEC ID number C
4. _____ FEC ID number C
5. _____ FEC ID number C

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Write or Type Committee Name

(MLBA TAAMC)

Michigan Licensed Beverage Association TAP Political Action Committee

6. Name of Any Connected Organization, Affiliated Committee, Leadership PAC Sponsor or Joint Fundraising Representative

Michigan Licensed Beverage Association

Mailing Address

920 N FAIRVIEW AVE

LANSING

CITY

MI

STATE

48912

ZIP CODE

Relationship:



Connected Organization



Affiliated Committee



Leadership PAC Sponsor



Joint Fundraising Representative

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name

Lance T. Binoniemi

Mailing Address

920 N FAIRVIEW AVE

LANSING

CITY

MI

STATE

48912

ZIP CODE

Title or Position

Asst. Treasurer

Telephone number

517-374-9611

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name of Treasurer

Thomas J. Jones

Mailing Address

920 N FAIRVIEW AVE

LANSING

CITY

MI

STATE

48912

ZIP CODE

Title or Position

TREASURER

Telephone number

517-374-9611

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Full Name of Designated Agent

David S. GERMROTH

Mailing Address

PO Box 20652

ALEXANDRIA

CITY

VA

STATE

22320-1652

ZIP CODE

Title or Position

Gov't Affairs Rep.

Telephone number

703-789-9235

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Capital National Bank

Mailing Address

PO Box 26068

Lansing

CITY

MI

STATE

48909-

ZIP CODE

Name of Bank, Depository, etc.

Mailing Address

CITY

STATE

ZIP CODE

28039672599

TAPPAC BYLAWS
A Political Action Committee
Connected to
The Michigan Licensed Beverage Association

Article 1- Name and Definition. The name of this committee is TAPPAC, hereinafter called "TAPPAC." It is a voluntary, unincorporated separate segregated fund sponsored by the Michigan Licensed Beverage Association.

TAPPAC is independent of any political party, candidate campaign committee, ballot issue committee or legislative campaign or state candidate fund.

Article 2 - Purpose. The purpose of TAPPAC is to encourage, support and promote voluntary participation in the Federal election and government processes by financially and personally assisting federal, candidates, who have demonstrated their commitment to good government and who have taken responsible positions on and national issues of interest, concern and importance to the hospitality industry.

TAPPAC will solicit and accept voluntary contributions from persons and entities, as allowed by law. TAPPAC, its officers and the officers, trustees, members and employees of the hospitality industry nationally are the covered class able to contribute to TAPPAC.

Article 3 - Principal Office. The principal office of the Committee shall be located at such place as is designated by the TAPPAC Officers.

Article 4- Membership. Membership in TAPPAC will be open to any individual that is a member, officer, director, trustee or employee of the hospitality industry nationally. Acceptance of any contribution to TAPPAC will be subject to the approval of the TAPPAC Officers. Membership is also contingent upon each prospective member submitting such information as may be required by TAPPAC Officers.

Article 5- Government Affairs Committee. The Government Affairs Committee shall consist of the President of the Michigan Licensed Beverage Association, The Treasurer of the TAPPAC and the Executive Director of the Michigan Licensed Beverage Association.

Article 6 - Officers and Employees.

- i. **Officers**
- ii. **General Powers.** The money, property, management and control over the affairs and activities of TAPPAC shall be managed and controlled by the PAC Treasurer and PAC Deputy Treasurer (collectively referred to as the Officers), and subject to advice and input from the members of the *Government Affairs Committee*
- iii. **Officers and Employees. Duties, Title and Number.** TAPPAC will have at least two (2) officers, a Treasurer and a Deputy Treasurer. The Officers may appoint such other officers or agents, including one or more Secretaries, as they shall deem desirable and such other officers shall have the authority and perform the duties prescribed from time to time by the Officers.
- iv. **Treasurer** - The Treasurer will be the chief executive officer of TAPPAC. He/She will perform all duties, tasks and responsibilities incident to the office, and will be an *ex-officio* member of all its committees, as well as a member of the Government Affairs Committee of Michigan Licensed Beverage Association. The Treasurer will preside at all PAC meetings. Additionally, the Treasurer will serve as signatory on the TAPPAC checking account, may sign any deeds, mortgages, bonds, contracts or other instruments, except in cases where the signing and execution thereof shall be expressly delegated by the Officers, acting through a vote, or by these Bylaws or by statute to some other officer or agent of TAPPAC. Finally, the Treasurer may authorize and approve expenditures, except expenditures involving contributions to candidates, other PAC's, political parties or caucus committees which shall only be done by the Government Affairs Committee of

Michigan Licensed Beverage Association, and take such other steps as he shall deem necessary to advance the purposes of TAPPAC.

- v. Deputy Treasurer - The Deputy Treasurer will perform such duties as customarily are performed by a treasurer. The Deputy Treasurer will also serve as a signatory on TAPPAC checking account, and be the custodian of the monies of TAPPAC. The Deputy Treasurer will collect, deposit or invest all monies, and make all disbursements as agreed to by the Treasurer and the Deputy Treasurer, or, when appropriate, the Government Affairs Committee of Michigan Licensed Beverage Association. The Deputy Treasurer will also keep full and accurate accounts, will present financial statements, and will prepare, sign and file all reports to governmental authorities required by law or directed to be filed by the Treasurer. The Deputy Treasurer will perform such other duties as may be directed or as may be prescribed by the Treasurer from time to time.
- vi. Secretary - The Secretary, if so appointed by the Officers or as otherwise provided herein, will perform such duties as customarily are performed by a secretary. The Secretary, if so appointed, will serve until such time as he or she dies, resigns, or is removed. In the absence of a Secretary, the Treasurer or Deputy Treasurer, whichever is designated by the Treasurer, shall fill this function. The Secretary will be the custodian of the records of the meetings of TAPPAC, keep the minutes, prepare and transcribe all correspondence, prepare all solicitation requests and letters of endorsement, and keep a roster of the names, telephone numbers, e-mail addresses and post office addresses of each member of the Government Affairs Committee of Michigan Licensed Beverage Association, each officer, employee and member of TAPPAC, and perform such other duties as he or she may be directed or as may be prescribed by the Treasurer from time to time.

B. Removal of Officers Any Officer may be removed by the Members of the Government Affairs Committee of the Michigan Licensed Beverage Association, whenever in their judgment the best interests of TAPPAC would be served thereby, but such removal shall be without prejudice to the contract rights, if any, of the officer so removed.

C. Vacancy A vacancy in any office because of death, resignation, removal or disqualification or otherwise, may be filled by the remaining Officer(s), or if no Officer(s) remain, by the members of the Government Affairs Committee of Michigan Licensed Beverage Association.

Article 7 - Contracts, Checks, Deposits, Contributions and Disbursements

A. Contracts The Officers may authorize any agent or agents of TAPPAC, in addition to the officer so authorized by these Bylaws, to enter into any contract or execute and deliver any instrument in the name of and on behalf of TAPPAC and such authority may be general or confined to specific instances.

B. Checks All checks, drafts, or orders for the payment of money, notes or other evidences of indebtedness, issued in the name of TAPPAC shall be signed by the Treasurer or Deputy Treasurer, or such officer or officers, agent or agents of TAPPAC and in such manner as shall from time to time be determined by resolution of the Officers.

C. Deposits All funds of TAPPAC shall be deposited from time to time according to law, to the credit of TAPPAC in such banks, trust companies, or other depositories as the Officers may select.

D. Contributions TAPPAC shall accept only unrestricted contributions, and no contribution shall be accepted which is earmarked by the Contributor for any particular purpose, issue, political committee or candidate. Contributions received by TAPPAC shall not be co-mingled with those of its sponsor or any affiliate, subsidiary or other organization controlled and maintained by Michigan Licensed Beverage Association, the sponsor of TAPPAC.

Except as permitted by federal law, TAPPAC shall not directly or indirectly accept any contributions or support from a corporation. Contributions to TAPPAC will not be solicited or accepted from foreign nationals, from any corporation's general operating fund, from one person but in the name of another person, or from an anonymous source.

E. **Disbursements.** Disbursement of any or all monies collected will be made only after approval by a majority of the members of the Government Affairs Committee of Michigan Licensed Beverage Association, or such other person or persons as designated by resolution by the members of the Government Affairs Committee of Michigan Licensed Beverage Association. All contributions received and disbursements made will be handled in a manner consistent with federal law and the rules and regulations of the federal Elections Commission and the Internal Revenue Service.

Article 8 - Books and Records. TAPPAC will keep accurate and complete books and records of account, and minutes of its proceedings or those of its committees having any of the authority of the Officers.

Article 9 - Fiscal Year. The fiscal year of TAPPAC shall begin on the first day of January and end on the last day of December.

Article 10 - Amendments. These Bylaws may be altered, amended or repealed and new Bylaws may be adopted by a majority of the Officers, present at any regular meeting or at any special meeting, if at least thirty days' notice is given of intention to alter, amend, or repeal or to adopt new Bylaws at such meeting. No amendment shall be made to these Bylaws changing, affecting or impacting Article 6, Section E, without first having received the advice and consent of the members of the Government Affairs Committee of Michigan Licensed Beverage Association.

Article 11 - Applicable Law. Federal Law and regulations of the Federal Elections Commission, and the Internal Revenue Service, will control the activities and operation of TAPPAC.

Article 12 - Indemnification. Any present or former officer of TAPPAC or other such persons so designated in the discretion of the Officers, or the legal representative of such person, shall be indemnified by TAPPAC against all reasonable costs, expenses, and counsel fees paid or incurred in connection with any action, suit or proceeding to which any such person or his legal representative may be made a party by reason of his being or having been such an officer or serving or having served TAPPAC, except in relation to matters as to which he or she shall be found guilty of negligence or misconduct in respect of the matters in which indemnity is sought and in relation to matters settled or otherwise terminated without a final determination on the merits where such settlement or terminating is predicated on the existence of such negligence or misconduct.

Article 13 - Dissolution. TAPPAC may be dissolved anytime upon a vote of a majority of the Officers. Any property in possession of TAPPAC at the time of dissolution will be disposed of in the manner provided in Section 102.3 of the Code of Federal Regulations including distribution to another PAC serving a similar purpose as this PAC or to a 501(c)(3) charity. No TAPPAC money or property will be distributed to PAC members upon its dissolution.

Article 14 - Confidentiality. TAPPAC will not reveal the names or addresses of any of the members of TAPPAC, except as otherwise required by the Campaign Finance Laws, or any other applicable law or regulation, or sell or otherwise distribute its membership or solicitation lists to any person or entity.

Article 15 - Procedure. The rules contained in the most recent edition of Robert's Rules of Order shall provide the rules of procedure for TAPPAC where they are not inconsistent with the provisions of these Bylaws or any formation document or resolution subsequently adopted by the appropriate body, acting with authority.

Signed this date: August 8, 2007

By:  _____

Thomas J. Jones, Treasurer

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REC'D MAR 17 2008

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 12, 2008

Thomas J. Jones, Treasurer
Tap Political Action Committee (TAPPAC)
920 North Fairview Ave
Lansing, MI 48912

**Response Due Date:
April 11, 2008**

Identification Number: C00433839

Reference: Amended Statement of Organization, received 2/29/08

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 item:

-Please clarify your relationship, if any, with Michigan Licensed Beverage Association, which appears to be your connected organization. Please be advised that a connected organization is any organization which 1) is not a political committee and 2) directly or indirectly establishes, administers, or financially supports a political committee. For further guidance on the question of connected organizations, please refer to 11 CFR §100.6. If Michigan Licensed Beverage Association is your connected organization you should amend your Statement of Organization to reflect this relationship as "connected" on Line 6.

Furthermore, please be advised that the entire name of your connected organization must be included in the name of your political committee. While committees may use commonly recognized abbreviations on daily communications such as letterhead and committee checks, committee filings (Statement of Organization, disclosure reports and amendments) must reflect the official name of the connected organization, as well as any abbreviation, within its title. 2 U.S.C. §432(e)(5) Please clarify this apparent discrepancy.

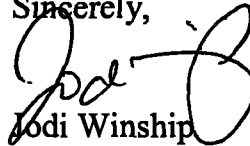
Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the

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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) 694-1136.


Sincerely,



Jodi Winship
Senior Campaign Finance Analyst
Reports Analysis Division

Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
 The FEC added this page to the end of this filing to indicate how it was received.

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<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked
<input checked="" type="checkbox"/> USPS Registered/Certified	Postmarked (R/C) 4/4/08
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<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
	Next Business Day Delivery <input type="checkbox"/>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
	4/9/08
PREPARER	DATE PREPARED