



WASHTENAW COUNTY DEMOCRATIC PARTY

October 22, 2002

Alva Smith
General Counsel's Office
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

MUR 5312
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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

2002 OCT 23 A 10:03

Dear Ms. Smith

I write in response to MUR 5312 received on October 8, 2002. Thank you for your confirmation that the date for response is October 23, 2002.

I believe there is no cause for action against this Committee or me. My guide for compliance has been the FEC Campaign Guide for Political Party Committees (1996).

Complaint Item #1: The Washtenaw County Democratic Committee is a political party committee of the Michigan Democratic Party. It is responsible for actions that are initiated by its officers and approved by the membership

Complaint Item #2: It is my understanding the Washtenaw County Democratic Committee must register as a political committee with the FEC when and if it spends more than \$1000 in contributions or expenditures for the purpose of influencing federal elections.

Excepting the \$1000 directly contributed to federal candidates, it is my belief that the amounts in Exhibits 3, 4, and 5 are exempt from the definitions of contribution and expenditure and need not be reported

Complaint Item #3: Agree.

Complaint Item #4: Agree

Complaint Item #5: Agree.

Complaint Item #6: The amounts detailed in Exhibit 3 are believed to have been exempt from the definitions of contribution and expenditure and need not to have been reported. I referred to the FEC Campaign Guide for Political Party Committees (1996), page 17, Ch 4, Sec 3, Exempt Party Activities.

The exempt federal expenditures in Exhibit 3 add up to a total \$1667.50. Please note that the complainant's total of \$3667.50 appears to me to represent the sum of the election cycle cumulatives rather than the sum of the exempt federal expenditures

Complaint Item #7: The office rent (Exhibit 4) is believed to have been an administrative expense exempt from the definitions of contribution and expenditure I referred to the FEC Campaign Guide for Political Party Committees (1996), page 19, Ch 4, Sec 7, Indirect Candidate Support, Administrative Expenses

The office was a Democratic Headquarters that indirectly benefited all Democratic candidates on the entire 2002 Washtenaw County general election ballot. The office was not put in place for nor used by any particular candidate

Complaint Item #8: I believe the activities described in Exhibit 5 were exempt from the definitions of contribution and expenditure. I referred the FEC Campaign Guide for Political Party Committees (1996) page 17, Ch 4, Sec 3, Exempt Party Activities

Complaint Item #9: I believe that the Washtenaw County Democratic Committee made \$1000 in federal contributions during the 2000 calendar year. The other amounts were exempt from the definitions of contribution and expenditure

Complaint Item #10: Understood.

Complaint Item #11: I believe the defined \$1000 contribution and expenditure threshold was not exceeded and therefore establishing a federal committee was not required

Because of the reasons outlined in my responses to Complaint Items 1-11, I ask that the Commission take no action against the Committee or me, dismiss this case and close the file.

Sincerely,



Barbara Ryan Fuller, Treasurer
Washtenaw County Democratic Committee
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Manchester, Michigan 48158
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