

rivers4congress

Rivers for Congress

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Congresswoman Lynn Rivers

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. I believe there is no cause for action against Rivers for Congress or me. My guides for compliance have been the FEC Campaign Guide for Congressional Candidates and Committees (1999) and the FEC Campaign Guide for Political Party Committees (1996).

As Treasurer of Rivers for Congress, I am responding to Complaint Items 5-8. Items 1-4 and 9-11 appear to speak specifically to the Washtenaw County Democratic Committee and its Treasurer.

Complaint Item #5: Agree.

Complaint Item #6: The exempt federal expenditures in Exhibit 3, attributable to Rivers for Congress, add up to \$329.50 and need not be reported by Rivers for Congress.

I referred the FEC Campaign Guide for Congressional Candidates and Committees (1999) page 23, Ch 7, Sec 7, Party Support, Exempt Party Activities and the FEC Campaign Guide for Political Party Committees (1996) page 17, Ch 4, Sec 3 Exempt Party Activities.

Complaint Item #7: The office rent (Exhibit 4) is believed to have been an administrative expense of the Washtenaw County Democratic Committee and not a contribution to Rivers for Congress. I referred to the FEC Political Party Committees Guide page 19, Ch 4, Sec 7, Indirect Candidate Support, Administrative Expenses.

Rivers for Congress maintained a distinctly separate political office in Ypsilanti, Michigan from December 1996-August 2002.

Complaint Item #8: I believe the activities described in Exhibit 5 were not contributions to Rivers for Congress. I referred to page 17 of the Campaign Guide for Congressional Candidates and Committees, Ch 4, Sec 3, Exempt Party Activities.

Because of the reasons outlined in my responses to Complaint Items 5-8, I respectfully request that the Commission take no action against Rivers for Congress or me, dismiss this case and close the file.

Sincerely,

Barbara Ryan Fuller, Treas.

Barbara Ryan Fuller, Treasurer
Rivers for Congress

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