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108344400000

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COMMISSION

DEC 6 PM 3:54

December 2, 2017

OFFICE OF GENERAL
COUNSEL

Mr. Jeff S. Jordan, Assistant General Counsel
c/o Christal Dennis, Paralegal
Federal Election Commission
Office of Complaints Examination and Legal Administration
999 E. Street, NW
Washington, DC 20463

Dear Mr. Jordan:

In response to [redacted] the Oakland County Democratic Party (OCDP) requests that no action be taken against our organization; against our Treasurer, Mr. Philip W. Reid; or against any other individuals associated with our organization. We are sending through the mail the back-up documentation that we have filed in the past that addressed 20 of the 21 items listed in your letter.

As we have shared with several individuals and departments within the FEC, most of our challenges stemmed from the debilitating, and eventually fatal, car accident suffered by our treasurer in 2010. The fall-out from that horrific accident led to an FEC audit that began during the winter of 2013. Since 2014, OCDP has worked diligently to create a system and put processes in place that enable us to file thorough, accurate, transparent, and timely reports to the FEC. We have communicated regularly with our FEC analysts – first Paul Stoetzer and currently Nicole Miller – and have addressed every issue that has been presented to us. Past correspondence with the FEC that outlines some of our history has been included in the documentation.

As a result of the findings of our audit that we were presented with in the summer of 2015, we implemented a point of sale (POS) system at our bingo hall in September of 2015 and created a sophisticated, hybrid recordkeeping process for a bingo operation that is typically manned by elderly, low tech savvy volunteers. Our process involves collecting individual bingo player information via the POS system at the bingo hall; reconfiguring the information so that it is able to be imported into NGP VAN (NGP) – our Customer Relationship Management system; and ultimately using the information in NGP to create our monthly FEC reports AND meet the requirements of the State of Michigan gaming laws.

The implementation of the POS system in September of 2015 necessitated an upgrade to NGP in December of 2015 to create compatibility between the two systems. Despite well-intentioned preparation, as is ultimately the case with major system upgrades, there were things that needed to be tweaked after the upgrade was made. When information of our over 50,000 contributors (mostly bingo players) transferred from our old system to our new system, some inadvertent changes took place – such as the classification of UAW Region 1 changing from a state organization to a Federal organization. Despite our best efforts, the volume of information transferred made it impossible to catch all of the errors that had been created with the transfer. As we became aware of the errors, they were corrected and our reports were amended.

The NGP upgraded system also included the option to automatically insert "Information Requested/Information Requested" for individuals missing "Employer/Occupation" information. Per our

conversations with Mr. Stoetzer, we believed that was acceptable to the FEC as long as we were making our best effort to collect the information. We sent letters to those missing information; did electronic searches including on social media; and provided bingo hall volunteers with lists of people that had missing information. Compounding the problem was and still is the fact that many bingo players play infrequently; move often; and are hesitant about providing personal information. We have made it very clear to our bingo volunteers that no one should be issued a bingo player card if they have not provided their full information which includes name, address, employer and occupation.

Many of the 21 items on your list were initially addressed when Paul Stoetzer was our analyst. Through regular contact with Mr. Stoetzer, we responded to all issues presented in RFAs and we believed that we were in compliance with FEC requirements. When Nicole Miller was assigned as our new FEC analyst, she reviewed all of our previously filed reports and we once again began receiving RFAs. As we have done since 2014, all RFAs were responded to on time and we have made every effort to correct any errors as well as revise our practices to be pro-active and prevent any additional errors in the future.

As an example – Ms. Miller informed us that abbreviations of employer and/or occupation are unacceptable. Bingo players that once put CSR as their occupation are now required to put Customer Service Representative. We now inform bingo players that they are required to provide complete, unabbreviated information. Ms. Miller also advised us that self-employed individuals must include the type of business they participate in. We have communicated that requirement to our bingo players. Because the requirements have changed from one analyst to the other, we have been faced with correcting information collected in the past. Again, we have made every effort to do that as referenced in the Form 99s filed on 5-24-17, 6-15-17 and 6-28-17. We have also included a copy of our “Bingo Player Card Application” at the back of the section addressing Items 8 through 16. This application clearly lists the FEC requirements for those filling out the application.

As we have shared in the past, the majority of the issues presented in your letter were a result of the massive changes OCDP has made to comply with increased FEC requirements. There was never an intention to under or incorrectly report contributions or disbursements. When the errors were discovered, they were promptly corrected. Most importantly, the initially unreported information had no impact on Federal election activity and therefore did not harm the public.

We hope that the documentation presented will satisfy the concerns of the FEC Office of General Counsel. Please let us know if any additional information or explanation is needed and we will make every effort to provide it. As we have done over the last 3 years, we will continue our best efforts to obtain full required contributor information; track every dollar in and every dollar out; regularly inform bingo players and bingo hall workers of the FEC requirements; and do everything we can to be transparent and meet the requirements of Federal law and the requests of our FEC analyst.

Thank you for your consideration,



Karen L. Miller, Data Manager
On behalf of the Oakland County Democratic Party and
the current OCDP Treasurer, Philip W. Reid



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

NOV. 17 2017

Oakland County Democratic Party
Phillip W. Reid, Treasurer
17100 W. 12 Mile Road, Suite 5
Southfield, MI 48076

Dear Mr. Reid:

The Federal Election Commission ("Commission") has ascertained information in the normal course of carrying out its supervisory responsibilities indicating that Oakland County Democratic Party and you, in your official capacity as treasurer ("Committee"), may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). The Committee has been referred by the Commission to the Office of General Counsel for possible enforcement action under 52 U.S.C. § 30109.¹ Specifically, the Committee has been referred for the following issues that may be in violation of the Act and Commission regulations:

1. 2015 Amended Year-End Report: Schedule A supporting Line 11(a)(i) disclosed the receipt of prohibited contributions totaling \$7,500.00, or 8.5% of the total contributions from individuals. This contribution was received from one (1) labor organization.
2. 2015 November Monthly Report: The report contained mathematical discrepancies on several lines in Column B totaling \$6,639.87.
3. 2015 Amended February Monthly Report: The Committee's report disclosed additional disbursements totaling \$180,866.72 on Schedule B supporting Line 21(b), resulting in an increase of more than 5% and \$10,000.00 over the original report.
4. 2015 Amended March Monthly Report: The Committee's report disclosed additional disbursements totaling \$355,689.84 on Schedule B supporting Line 21(b), resulting in an increase of more than 5% and \$10,000.00 over the original report.
5. 2015 Amended April Monthly Report: The Committee's report disclosed additional disbursements totaling \$225,355.59 on Schedule B supporting Line 21(b), resulting in an increase of more than 5% and \$10,000.00 over the original report.
6. 2015 Amended May Report: The Committee's report disclosed additional disbursements totaling \$35,689.23 on Schedule B supporting Line 21(b), resulting in an increase of more than 5% and \$10,000.00 over the original report.
7. 2015 Amended June Monthly Report: The Committee's report disclosed additional disbursements totaling \$26,860.51 on Schedule B supporting Line 21(b), resulting in an increase of more than 5% and \$10,000.00 over the original report.
8. 2015 February Monthly Report: Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 245 of 365, or 67.1%, of the contributions from individuals that require itemization.
9. 2015 Amended March Monthly Report: Schedule A supporting Line 11(a)(i) failed to

¹ Notification of this referral is being provided to you pursuant to the Commission's Agency Procedure for Notice to Respondents in Non-Complaint Generated Matters, as published in the Federal Register on August 4, 2009 (74 Fed. Reg. 38,617).

- disclose adequate identification for 235 of 341, or 68.9%, of the contributions from individuals that require itemization.
10. 2015 Amended April Monthly Report: Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 383 of 533, or 71.9%, of the contributions from individuals that require itemization.
 11. 2015 Amended May Monthly Report: Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 385 of 542, or 71.0%, of the contributions from individuals that require itemization.
 12. 2015 Amended Year-End Report: Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 784 of 1,435, or 54.6%, of the contributions from individuals that require itemization.
 13. 2016 Amended March Monthly Report: Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 575 of 1,162, or 49.5%, of the contributions from individuals that require itemization.
 14. 2016 Amended April Monthly Report: Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 77 of 1,439, or 53.8%, of the contributions from individuals that require itemization.
 15. 2016 Amended May Monthly Report: Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 962 of 1,834, or 52.5%, of the contributions from individuals that require itemization.
 16. 2016 Amended June Monthly Report: Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 877 of 1,725, or 50.8%, of the contributions from individuals that require itemization.
 17. 2015 Amended February Monthly Report: Schedule B supporting Line 21(b) disclosed thirty-four (34) payments to "Non-Voucher Prize Winners" for the purpose of "Non Voucher Prize Payouts" but failed to itemize the individuals who received payment totaling \$73,353.30.
 18. 2015 Amended March Monthly Report: Schedule B supporting Line 21(b) disclosed forty (40) payments to "Non-Voucher Prize Winners" for the purpose of "Non Voucher Prize Payouts" but failed to itemize the individuals who received payment totaling \$95,831.80.
 19. 2015 Amended April Monthly Report: Schedule B supporting Line 21(b) disclosed twenty-seven (27) payments to "Non-Voucher Prize Winners" for the purpose of "Non Voucher Prize Payouts" but failed to itemize the individuals who received payment totaling \$66,786.40.
 20. 2015 Amended May Monthly Report: Schedule B supporting Line 21(b) disclosed twenty-five (25) payments to "Non-Voucher Prize Winners" for the purpose of "Non Voucher Prize Payouts" but failed to itemize the individuals who received payment totaling \$64,830.40.
 21. 2015 Amended March Monthly Report: Schedule H1 failed to disclose the correct ratio for the allocated federal and non-federal activity.

We have numbered this referral

The Act affords you the opportunity to demonstrate in writing that no action should be taken against Oakland County Democratic Party and you, in your official capacity as treasurer, in this matter. If you wish to file a response, you may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Where appropriate, statements should be submitted under oath by persons with relevant knowledge. Your response,

which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 52 U.S.C. §§ 30109(a)(4)(B) and 30109(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. Please be advised that, although the Commission cannot disclose information regarding an investigation to the public, it may share information on a confidential basis with other law enforcement agencies.²

Please note that you have a legal obligation to preserve all documents, records, and materials relating to the subject matter of the referral until such time as you are notified that the Commission has closed its file in this matter. See 18 U.S.C. § 1519.

Any correspondence sent to the Commission, such as a response, must be addressed to one of the following (note, if submitting via email this Office will provide an electronic receipt by email):

Mail
Federal Election Commission
Office of Complaints Examination
and Legal Administration
Attn: Christal Dennis, Paralegal
999 E Street, NW
Washington, DC 20463

OR Email
CELA@fec.gov

If you have any questions, please contact Christal Dennis at (202) 694-1650 or toll free at 1-800-424-9530. For your information, we have enclosed a brief description of the Commission's preliminary procedures for processing possible violations discovered by the Commission.

Sincerely,



Jeff S. Jordan
Assistant General Counsel
Complaints Examination &
Legal Administration

² The Commission has the statutory authority to refer knowing and willful violations of the Act to the Department of Justice for potential criminal prosecution, 52 U.S.C. § 30109(a)(5)(C), and to report information regarding violations of law not within its jurisdiction to appropriate law enforcement authorities. *Id.* § 30107(a)(9).

Oakland County Democratic Party
FEC ID #C00040857

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2. 2015 November Monthly Report: The report contained mathematical discrepancies on several lines in Column B totaling \$6,639.87.

Included are the following documents:

- RFAI dated 2-3-16
- Amendment 1 filed 2-25-16
- Form 99 Response dated 3-7-16

This issue was also a result of the NGP VAN system upgrade made on December 10, 2015. After receiving the RFAI, we had a conversation with our FEC analyst, Paul Stoetzer, on February 24, 2016. Per our conversation, Amendment 1 was filed on February 25, 2016, with an adjustment on Line 17, Column A.

The following note was included on Amendment 1: Per our conversation with Paul Stoetzer on 2-24-16, the adjustment on Line 17, Column A is being made due to the issues that were created with the upgrade of our NGP software. This adjustment brings the cash on hand amounts on Line 8, Columns A and B back into alignment.

Form 99 was also filed on 3-7-16 –

“In response to the RFAI dated February 24, 2016, covering our November Monthly Report, we filed an amended November report on February 25, 2016. The discrepancy was caused due to the upgrading of our campaign software – NGP. Per our conversation with Paul Stoetzer, an adjustment was made to align our year to date totals. Due to this adjustment, amended reports were also filed on February 25, 2016, for our December Monthly Report and our 2015 Year End Report. Our February 2016 report will also be amended to reflect the updated case on hand total.”

1000004440001

OAKLAND COUNTY DEMOCRATIC PARTY

Page 2 of 2

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) 694-1393.

Sincerely,



Paul Stotzer
Senior Campaign Finance Analyst
Reports Analysis Division

320

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

Oakland County Democratic Party

Report Covering the Period:

From:

10 01 2015

To:

10 31 2015

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2015		401368.49
(b) Cash on Hand at Beginning of Reporting Period.....	30348.22	
(c) Total Receipts (from Line 19)	104694.89	1041635.05
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	135043.11	1443003.54
7. Total Disbursements (from Line 31).....	95903.78	1403864.21
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	39139.33	39139.33
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

DETAILED SUMMARY PAGE
of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Oakland County Democratic Party

Report Covering the Period: From: 10 01 2015 To: 10 31 2015

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	95458.00	628991.00
(ii) Unitemized.....	0.00	412644.05
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	95458.00	1041635.05
(b) Political Party Committees.....	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	95458.00	1041635.05
12. Transfers From Affiliated/Other Party Committees.....	0.00	0.00
13. All Loans Received.....	0.00	0.00
14. Loan Repayments Received.....	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0.00	0.00
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.).....	9236.89	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0.00	0.00
(b) Levin Funds (from Schedule H5).....	0.00	0.00
(c) Total Transfers (add 18(a) and 18(b))..	0.00	0.00
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	104694.89	1041635.05
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	104694.89	1041635.05

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 4

II. Disbursements		COLUMN A	COLUMN B
		Total This Period	Calendar Year-to-Date
21. Operating Expenditures:			
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)			
(i) Federal Share		0.00	0.00
(ii) Non-Federal Share.....		0.00	0.00
(b) Other Federal Operating Expenditures		95903.78	1403864.21
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	▶	95903.78	1403864.21
22. Transfers to Affiliated/Other Party Committees.....		0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees.....		0.00	0.00
24. Independent Expenditures (use Schedule E).....		0.00	0.00
25. Coordinated Party Expenditures (2 U.S.C. §441a(d)) (use Schedule F).....		0.00	0.00
26. Loan Repayments Made.....		0.00	0.00
27. Loans Made.....		0.00	0.00
28. Refunds of Contributions To:			
(a) Individuals/Persons Other Than Political Committees		0.00	0.00
(b) Political Party Committees		0.00	0.00
(c) Other Political Committees (such as PACs).....		0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)).....	▶	0.00	0.00
29. Other Disbursements		0.00	0.00
30. Federal Election Activity (2 U.S.C. §431(20))			
(a) Allocated Federal Election Activity (from Schedule H6)			
(i) Federal Share		0.00	0.00
(ii) "Levin" Share.....		0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds		0.00	0.00
(c) Total Federal Election Activity (add .. Lines 30(a)(i), 30(a)(ii) and 30(b))....	▶	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))..		95903.78	1403864.21
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....	▶	95903.78	1403864.21

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

III. Net Contributions/Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	95458.00	1041635.05
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	95458.00	1041635.05
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	95903.78	1403864.21
37. Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)	95903.78	1403864.21

1001001001001

FEC MISCELLANEOUS TEXT RELATED TO A REPORT, SCHEDULE OR ITEMIZATION

Form/Schedule: F3XA
Transaction ID :

Per our conversation with Paul Stotzer on 2-24-16, the adjustment on Line 17, Column A is being made due to the issues that were created with the upgrade of our NGP software. This adjustment brings the cash on hand amounts on Line 8 Columns A and B back into alignment.

Form/Schedule:
Transaction ID:

MISCELLANEOUS TEXT (FEC Form 99)

NAME OF COMMITTEE (In Full)
Oakland County Democratic Party

FEC IDENTIFICATION NUMBER
C00040857

Mailing Address 17100 W. 12 Mile Rd.
Suite 5

City State ZIP Code
Southfield MI 48076

In response to the RFAI dated February 3, 2016, covering our November Monthly Report, we filed an amended November report on February 25, 2016. The discrepancy was caused due to the upgrading of our campaign software - NGP. Per our conversation with Paul Stoetzer, an adjustment was made to align our year to date totals. Due to this adjustment, amended reports were also filed on February 25, 2016, for our December Monthly Report and our Year End Report. Our February 2016 report will also be amended to reflect the updated cash on hand total.

17100671444001



Oakland County Democratic Party
FEC ID #C00040857

2017 FEB -6 PM 3: 54

1. 2015 Amended Year-End Report: Schedule A supporting Line 11(a)(1) disclosed the receipt of prohibited contributions totaling \$7,500.00 or 8.5% of the total contributions from individuals. This contribution was received from one (1) labor organization.

Included are the following documents:

- Amendment 1 filed 2-25-16
- RFAI dated 5-3-16
- Form 99 Response dated 6-4-16
- Amendment 2 filed 6-13-16

As has been previously communicated, the Oakland County Democratic Party (OCDP) implemented a Point of Sale (POS) system in September 2015 which allows us to track individual contributions and disbursements made by and to bingo players playing our Federal bingo fundraising games. We have also used NGP VAN as our primary interface for filing, amending and communicating with the FEC report system. Once we began using the POS, it became obvious that it was going to be necessary for us to upgrade our NGP VAN software so that we were able to interface the two systems. At substantial cost, we upgraded the system December 10, 2015. Even though we worked with NGP in preparation for the upgrade, as is always the case with major upgrades, there were issues that could not be anticipated.

When information from the old NGP system was transferred to the new NGP system, some classifications of individuals and organizations were randomly changed. In the case of the UAW Region 1, the NGP classification changed from a non-federal/state organization to a Federal organization. We were unaware of this issue until we received the RFAI dated 5-3-16. Due to the NGP glitch, a \$7500 contribution made by the UAW Region 1 on December 4, 2015 was reported as a Federal contribution on our FEC reports. Due to the change in classifications, the error check in NGP did not recognize the error.

As soon as we received the RFAI, we corrected the error in NGP; looked for any other changes that had been mistakenly made in the upgrade; and filed Amendment 2 on 6-13-16.

Amendment 2 contains the following note: This amendment corrects the \$7500 contribution that was reported as a federal contribution when it was a non-federal contribution. This error was due to the upgrade on December 10 of our NGP software.

The contribution was contained in our original year-end report as well as in our Amendment 1, appearing on page 561 of 893. The contribution was removed prior to filing Amendment 2. See page 562 of 956.

11004440001

Image# 201602259009624300

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

Oakland County Democratic Party

ADDRESS (number and street) 17100 W. 12 Mile Road

X Check if different than previously reported. (ACC)

Southfield

MI

48076

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

C C00040857

3. IS THIS REPORT NEW (N) OR AMENDED (A) X

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Year-End Report (YE)
- July 31 Mid-Year Report (Non-election Year Only) (MY)
- Termination Report (TER)

(b) Monthly Report Due On:

Feb 20 (M2)	May 20 (M5)	Aug 20 (M8)	Nov 20 (M11) (Non-Election Year Only)
Mar 20 (M3)	Jun 20 (M6)	Sep 20 (M9)	Dec 20 (M12) (Non-Election Year Only)
Apr 20 (M4)	Jul 20 (M7)	Oct 20 (M10)	X Jan 31 (YE)

(c) 12-Day PRE-Election Report for the:

Primary (12P)	General (12G)	Runoff (12R)
Convention (12C)	Special (12S)	

Election on

in the State of

(d) 30-Day POST-Election Report for the:

General (30G)	Runoff (30R)	Special (30S)
---------------	--------------	---------------

Election on

in the State of

5. Covering Period 12 01 2015 through 12 31 2015

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

Type or Print Name of Treasurer Phillip W Reid

Signature of Treasurer

Phillip W Reid

[Electronically Filed]

Date

02 25 2016

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

Office Use Only

FEC FORM 3X Rev. 12/2004

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

Oakland County Democratic Party

Report Covering the Period: From: M M / D / Y Y Y Y 12 01 2015 To: M M / D / Y Y Y Y 12 31 2015

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2015		401368.49
(b) Cash on Hand at Beginning of Reporting Period.....	44690.28	
(c) Total Receipts (from Line 19).....	87950.00	1241860.62
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	132640.28	1643229.11
7. Total Disbursements (from Line 31).....	80848.92	1591437.75
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)).....	51791.36	51791.36
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D).....	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D).....	0.00	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

DETAILED SUMMARY PAGE
of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Oakland County Democratic Party

Report Covering the Period: From: 12 01 2015 To: 12 31 2015

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	87950.00	825969.07
(ii) Unitemized.....	0.00	412644.05
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	87950.00	1238613.12
(b) Political Party Committees.....	0.00	1022.50
(c) Other Political Committees (such as PACs).....	0.00	2225.00
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	87950.00	1241860.62
12. Transfers From Affiliated/Other Party Committees.....	0.00	0.00
13. All Loans Received.....	0.00	0.00
14. Loan Repayments Received.....	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0.00	0.00
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.).....	0.00	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0.00	0.00
(b) Levin Funds (from Schedule H5).....	0.00	0.00
(c) Total Transfers (add 18(a) and 18(b))..	0.00	0.00
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	87950.00	1241860.62
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	87950.00	1241860.62

10034410000

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 4

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share	0.00	0.00
(ii) Non-Federal Share.....	0.00	0.00
(b) Other Federal Operating Expenditures	80848.92	1591437.75
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	80848.92	1591437.75
22. Transfers to Affiliated/Other Party Committees.....	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	0.00	0.00
24. Independent Expenditures (use Schedule E)	0.00	0.00
25. Coordinated Party Expenditures (2 U.S.C. §441a(d)) (use Schedule F).....	0.00	0.00
26. Loan Repayments Made.....	0.00	0.00
27. Loans Made.....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees.....	0.00	0.00
(b) Political Party Committees.....	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)).....	0.00	0.00
29. Other Disbursements	0.00	0.00
30. Federal Election Activity (2 U.S.C. §431(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share	0.00	0.00
(ii) "Levin" Share.....	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds	0.00	0.00
(c) Total Federal Election Activity (add .. Lines 30(a)(i), 30(a)(ii) and 30(b))....	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) ..	80848.92	1591437.75
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....	80848.92	1591437.75

OAKLAND COUNTY DEMOCRATIC PARTY

Page 2 of 2

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

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 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) 694-1393.

Sincerely,



Paul Stoetzer
Senior Campaign Finance Analyst
Reports Analysis Division

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Image# 201608139017562076

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT Example: If typing, type over the lines. 12FE4M5

Oakland County Democratic Party

ADDRESS (number and street)

17100 W. 12 Mile Road

Suite 5

X Check if different than previously reported. (ACC)

Southfield

MI

48076

2. FEC IDENTIFICATION NUMBER CITY STATE ZIP CODE

C C00040857

3. IS THIS REPORT NEW OR AMENDED (N) (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
July 15 Quarterly Report (Q2)
October 15 Quarterly Report (Q3)
January 31 Year-End Report (YE)
July 31 Mid-Year Report (Non-election Year Only) (MY)
Termination Report (TER)

(b) Monthly Report Due On: Feb 20 (M2) May 20 (M5) Aug 20 (M8) Nov 20 (M11)
Mar 20 (M3) Jun 20 (M6) Sep 20 (M9) Dec 20 (M12)
Apr 20 (M4) Jul 20 (M7) Oct 20 (M10) X Jan 31 (YE)

(c) 12-Day PRE-Election Report for the: Primary (12P) General (12G) Runoff (12R)
Convention (12C) Special (12S)

(d) 30-Day POST-Election Report for the: General (30G) Runoff (30R) Special (30S)

5. Covering Period 12 01 2015 through 12 31 2015

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

Type or Print Name of Treasurer Phillip W Reid

Signature of Treasurer Phillip W Reid [Electronically Filed] Date 06 13 2016

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

Office Use Only

FEC FORM 3X Rev. 12/2004

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

Oakland County Democratic Party

Report Covering the Period: From: ^{M M D D Y Y} 12 01 2015 To: ^{M M D D Y Y} 12 31 2015

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2015		401368.49
(b) Cash on Hand at Beginning of Reporting Period.....	43738.71	
(c) Total Receipts (from Line 19)	80450.00	1228470.05
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	124188.71	1629838.54
7. Total Disbursements (from Line 31).....	87178.81	1592828.64
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)).....	37009.90	37009.90
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

DETAILED SUMMARY PAGE
of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

Oakland County Democratic Party

Report Covering the Period: From: 12 01 2015 To: 12 31 2015

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	80450.00	815826.00
(ii) Unitemized.....	0.00	412644.05
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	80450.00	1228470.05
(b) Political Party Committees.....	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	80450.00	1228470.05
12. Transfers From Affiliated/Other Party Committees.....	0.00	0.00
13. All Loans Received.....	0.00	0.00
14. Loan Repayments Received.....	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0.00	0.00
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.).....	0.00	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0.00	0.00
(b) Levin Funds (from Schedule H5).....	0.00	0.00
(c) Total Transfers (add 18(a) and 18(b))..	0.00	0.00
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	80450.00	1228470.05
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	80450.00	1228470.05

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 4

II. Disbursements		COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:			
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)			
(i) Federal Share	9198.57	18986.64	
(ii) Non-Federal Share.....	12120.77	24962.04	
(b) Other Federal Operating Expenditures	65859.47	1548879.96	
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	87178.81	1592828.64	
22. Transfers to Affiliated/Other Party Committees.....	0.00	0.00	
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	0.00	0.00	
24. Independent Expenditures (use Schedule E)	0.00	0.00	
25. Coordinated Party Expenditures (2 U.S.C. §441a(d)) (use Schedule F).....	0.00	0.00	
26. Loan Repayments Made.....	0.00	0.00	
27. Loans Made.....	0.00	0.00	
28. Refunds of Contributions To:			
(a) Individuals/Persons Other Than Political Committees	0.00	0.00	
(b) Political Party Committees	0.00	0.00	
(c) Other Political Committees (such as PACs).....	0.00	0.00	
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)).....	0.00	0.00	
29. Other Disbursements	0.00	0.00	
30. Federal Election Activity (2 U.S.C. §431(20))			
(a) Allocated Federal Election Activity (from Schedule H6)			
(i) Federal Share	0.00	0.00	
(ii) "Levin" Share.....	0.00	0.00	
(b) Federal Election Activity Paid Entirely With Federal Funds	0.00	0.00	
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b)).....	0.00	0.00	
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))..	87178.81	1592828.64	
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....	75058.04	1567866.60	

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

III. Net Contributions/Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	80450.00	1228470.05
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	80450.00	1228470.05
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	75058.04	1567866.60
37. Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)	75058.04	1567866.60

FEC MISCELLANEOUS TEXT RELATED TO A REPORT, SCHEDULE OR ITEMIZATION

Form/Schedule: F3XA
Transaction ID:

This amendment corrects the \$7500 contribution that was reported as a federal contribution when it was a non-federal contribution. This error was due to the upgrade on December 10 of our NGP software. This amendment also designates those disbursements that are eligible for a non-fed transfer.

Form/Schedule:
Transaction ID:

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE 562 OF 958
	<input checked="" type="checkbox"/> 11a <input type="checkbox"/> 13 <input type="checkbox"/> 11b <input type="checkbox"/> 14 <input type="checkbox"/> 11c <input type="checkbox"/> 15 <input type="checkbox"/> 12 <input type="checkbox"/> 16 <input type="checkbox"/> 17	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Oakland County Democratic Party

Full Name (Last, First, Middle Initial) A. Patricia Turonek			Date of Receipt 12 / 03 / 2015	
Mailing Address 28854 Walker Ave			Transaction ID : VR0PQE06BR7	
City Warren	State MI	Zip Code 48092-4154	Amount of Each Receipt this Period 41.00	
FEC ID number of contributing federal political committee. C			Memo Item	
Name of Employer Information Requested		Occupation Information Requested		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 86.00		

Full Name (Last, First, Middle Initial) B. Devikia Tyson			Date of Receipt 12 / 07 / 2015	
Mailing Address 25808 Lincoln Terrace Dr			Transaction ID : VR0PQER45C6	
City Oak Park	State MI	Zip Code 48237-1246	Amount of Each Receipt this Period 84.00	
FEC ID number of contributing federal political committee. C			Memo Item	
Name of Employer None		Occupation Homemaker		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 84.00		

Full Name (Last, First, Middle Initial) C. Denice Unger			Date of Receipt 12 / 03 / 2015	
Mailing Address 4402 Rosewold Ave			Transaction ID : VR0PQE06AZ0	
City Royal Oak	State MI	Zip Code 48073-1743	Amount of Each Receipt this Period 50.00	
FEC ID number of contributing federal political committee. C			Memo Item	
Name of Employer None		Occupation Housewife		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 318.00		

SUBTOTAL of Receipts This Page (optional).....▶	175.00
TOTAL This Period (last page this line number only).....▶	

3. 2015 Amended February Monthly Report: The Committee's report disclosed additional disbursements totaling \$180,866.72 on Schedule B supporting Line 21 (b), resulting in an increase of more than 5% and \$10,000 over the original report.
4. 2015 Amended March Monthly Report: The Committee's report disclosed additional disbursements totaling \$355,689.84 on Schedule B supporting Line 21 (b), resulting in an increase of more than 5% and \$10,000 over the original report.
5. 2015 Amended April Monthly Report: The Committee's report disclosed additional disbursements totaling \$225,355.59 on Schedule B supporting Line 21 (b), resulting in an increase of more than 5% and \$10,000 over the original report.
6. 2015 Amended May Monthly Report: The Committee's report disclosed additional disbursements totaling \$35,689.23 on Schedule B supporting Line 21 (b), resulting in an increase of more than 5% and \$10,000 over the original report.
7. 2015 Amended June Monthly Report: The Committee's report disclosed additional disbursements totaling \$26,860.51 on Schedule B supporting Line 21 (b), resulting in an increase of more than 5% and \$10,000 over the original report.

Included are the following documents:

RFAI dated 9-27-15 - Amended February 2015 Monthly
Form 99 Response dated 9-28-15
Form 99 Response dated 11-2-15 #1

RFAI dated 9-30-15 - Amended March 2015 Monthly
Form 99 Response dated 11-4-15 #1

RFAI dated 9-30-15 - Amended April 2015 Monthly
Form 99 Response dated 11-2-15 #1

RFAI dated 10-5-15 - Amended May 2015 Monthly
Form 99 Response dated 9-8-15
Form 99 Response dated 11-9-15 #1

RFAI dated 10-7-15 - Amended June 2015 Monthly
Form 99 Response dated 11-10-15

OFFICE OF GENERAL
REGISTRATION
OCT - 6 PM 3:54

Prior to the implementation of our POS system, OCDP used QuickBooks to enter disbursement information. That data was then imported into NGP where it was used to compile and file our FEC monthly reports. In the fall of 2014, OCDP began running 6 bingos instead of 2. The parameters for transfer of information between QuickBooks and NGP were not correctly set for the additional bingos that were added, resulting in an under-reporting of disbursements. After a discussion with Paul Stoetzer, the parameters were re-set and the amendments were filed containing the correct disbursement information.

The increases in disbursements in the amendments were addressed in the Form 99 Report filed on 9-28-15. Because subsequent reports had already been filed prior to our knowledge of the non-transfer of the additional \$10,000 in disbursements, it was necessary to amend the subsequent reports. In addition to the February 2015 amendment being filed, amendments were filed for our March 2015, April 2015, May 2015, and June 2015 monthly reports.

During this time, we were in constant contact with our FEC analyst, Paul Stoetzer, apprising him of the challenges we were facing. We were totally committed to filing accurate, timely monthly reports and we responded to every issue that was presented to us.

Because the systems we have used to compile data with the ultimate goal of filing accurate FEC reports aren't necessarily designed to work together, we have paid for modifications to be made to the various systems; we have adapted our multiple processes to meet the goal; and we have stopped using QuickBooks due to the multiple points that errors were created.

MISCELLANEOUS TEXT (FEC Form 99)

Response to RAI FEC-1015850, February 2015 Original Report Amendments

Our amended reports show an increase in disbursements over our original report due to bingo disbursements that did not properly transfer from QuickBooks to NGP.

Our H1 was filed on 3-19-15 with our February 2015 report when we were made aware that it had not been filed in January.

10054410001



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 27, 2015

PHILLIP W. REID, TREASURER
OAKLAND COUNTY DEMOCRATIC PARTY
24445 NORTHWESTERN HWY, SUITE 110
SOUTHFIELD, MI 48075

Response Due Date

11/02/2015

IDENTIFICATION NUMBER: C00040857

REFERENCE: AMENDED FEBRUARY MONTHLY REPORT (01/01/2015 - 01/31/2015),
RECEIVED 07/16/2015

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 4 item(s):

1. Your amended report discloses an increase in disbursements totaling \$180,854.77 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)
2. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer name and occupation entries appear on your report and are not considered acceptable: "Bingo Player / Bingo Player," "Bingo Player / Information Requested," "Bingo Player / Binglo Player," and "Information Requested / Information Requested."

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed

OAKLAND COUNTY DEMOCRATIC PARTY

Page 2 of 3

description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

3. Schedule B of your report discloses disbursements to "Non-Voucher Prize Winners" for "Non Voucher Prize Payouts"; however, you have not itemized the individuals who received payment. For each individual or vendor paid in excess of \$200 in a calendar year, a memo entry including the name and address of the individual receiving the prize, as well as the date, amount, amend purpose of the original disbursement must be provided. Please amend your report to include the missing information or provide clarifying information if memo entries are not required. (11 CFR § 104.9)

OAKLAND COUNTY DEMOCRATIC PARTY

Page 3 of 3

4. Your report does not include a Schedule H1 to disclose the ratio for the allocation of certain costs. For State, District and Local party committees, Schedule H1 must be filed in the first report each calendar year that discloses an allocable disbursement. Further, all shared administrative, generic voter drive and exempt activity costs incurred during the two-year cycle must be allocated according to the appropriate fixed ratio, unless the federal account elects to pay a higher percentage of its cost. (11 CFR §§106.7(d)(2) and (3))

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 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) 694-1393.

Sincerely,



Paul Stoetzer
Senior Campaign Finance Analyst
Reports Analysis Division

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MISCELLANEOUS TEXT (FEC Form 99)

Response to RAI for FEC-1015850 Amendment

This message is in response to the RAI for our amended February 2015 report covering January 2015.

1. Our amended report shows an increase in disbursements over our original report due to bingo disbursements that did not properly transfer from QuickBooks to NGP. Our amendment properly reported the disbursements. This issue was addressed in our Form 99 filed on September 28, 2015.

2. The Oakland County Democratic Party has attempted ""best efforts"" to solicit the requested information for all donors mandated by ""11 CFR."" Past attempts to gather this information include: 1) Direct asks by volunteers and paid staff to said donors; 2) Mailings; and 3) Follow up phone calls. It is also worth noting that the vast majority of the individuals who we listed as ""Bingo Player"" have no other source of income (either being retired or a homemaker) which lead to some of the confusion from these individuals as to whom they should list and how we should track employer information. We are currently increasing our efforts now to rectify this for all donors including: 1) Re-educating our volunteers and staff at the Bingo Hall to ensure they are properly assisting us in collecting information through face-to-face efforts requiring individuals to complete a form; 2) Additional monthly mailings to these individuals; 3) Phone calls by volunteers and/or staff.

3. The changes in interpretation of what we were required to do per CFR 11 for the ""Non-Voucher Prize Winners"" has recently been updated after a recently completed audit by the FEC (approved in the summer of 2015 by the Commission). We have fully complied and cooperated with all requests and findings of the Commission and have invested considerable resources to change our entire record-keeping system to an electronic Point-of-Sale and Player ID Card tracking system that should enable detailed reports moving forward.

4. Our H1 was filed on 3-19-15 with our March 2015 report for February 2015 when we were made aware that it had not been filed in February. This was also addressed in our Form 99 filed on September 28, 2015.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 30, 2015

PHILLIP W. REID, TREASURER
OAKLAND COUNTY DEMOCRATIC PARTY
24445 NORTHWESTERN HWY, SUITE 110
SOUTHFIELD, MI 48075

Response Due Date

11/04/2015

IDENTIFICATION NUMBER: C00040857

REFERENCE: AMENDED MARCH MONTHLY REPORT (02/01/2015 - 02/28/2015),
RECEIVED 07/16/2015

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 5 item(s):

1. Your amended report discloses an increase in disbursements totaling \$355,689.84 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)
2. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer name and occupation entries appear on your report and are not considered acceptable: "Bingo Player / Bingo Player," "Bingo Player / This individual is a Bingo participant," "Information Requested / Information Requested," "Bingo Player / Information Requested," "Information Requested / Student," and "Bingo Player / Binglo Player."

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information.

OAKLAND COUNTY DEMOCRATIC PARTY

Page 2 of 4

To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

3. Schedule B of your report discloses disbursements to "Non-Voucher Prize Winners" for "Non Voucher Prize Payouts"; however, you have not itemized the individuals who received payment. For each individual or vendor paid in excess of \$200 in a calendar year, a memo entry including the name and address of the individual receiving the prize, as well as the date, amount, amend purpose of the original disbursement must be provided. Please amend your report to include the missing information or provide clarifying information if memo entries are not required. (11 CFR § 104.9)

OAKLAND COUNTY DEMOCRATIC PARTY

Page 3 of 4

4. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "Quick Shot." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf.

5. On Schedule H1 of your report, you have checked an incorrect fixed percentage for your allocated federal and non-federal administrative, generic voter drive and exempt activity costs. The fixed percentage for these costs is based on whether a Presidential and/or a Senate candidate appear on the State's ballot. Please amend your report to include a corrected Schedule H1 and note that a change in this ratio may make it necessary to repay your non-federal account for any overpayments that may have been made. While the Commission may take further legal action concerning any impermissible overpayments by the non-federal account, your prompt action will be taken into consideration. (11 CFR §106.7(d)(2) and (3))

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 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) 694-1393.

MISCELLANEOUS TEXT (FEC Form 99)

This message is in response to the RAI for our amended March 2015 report covering February 2015. Filing an amended report would not provide any of the requested additional information per our responses below.

1. Our amended report shows an increase in disbursements over our original report due to bingo disbursements that did not properly transfer from QuickBooks to NGP on our February 2015 report. The amending of the February report necessitated the filing of amended reports for all following months. Our amendment properly reported the disbursements.

2. The Oakland County Democratic Party has attempted ""best efforts"" to solicit the requested information for all donors mandated by ""11 CFR."" Past attempts to gather this information include: 1) Direct asks by volunteers and paid staff to said donors; 2) Mailings; and 3) Follow up phone calls. It is also worth noting that the vast majority of the individuals who we listed as ""Bingo Player"" have no other source of income (either being retired or a homemaker) which lead to some of the confusion from these individuals as to whom they should list and how we should track employer information. We are currently increasing our efforts now to rectify this for all donors including: 1) Re-educating our volunteers and staff at the Bingo Hall to ensure they are properly assisting us in collecting information through face-to-face efforts requiring individuals to complete a form; 2) Additional monthly mailings to these individuals; 3) Phone calls by volunteers and/or staff.

3. The changes in interpretation of what we were required to do per CFR 11 for the ""Non-Voucher Prize Winners"" has recently been updated after a recently completed audit by the FEC (approved in the summer of 2015 by the Commission). We have fully complied and cooperated with all requests and findings of the Commission and have invested considerable resources to change our entire record-keeping system to an electronic Point-of-Sale and Player ID Card tracking system that should enable detailed reports moving forward.

4. Quick Shot is a type of bingo game. Disbursements for this game will be included in Bingo Supplies in future reports filed after October 2015.

5. We will file an amended H1 report to reflect the correct percentage of 15%. - 28702

1007444001



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 30, 2015

PHILLIP W. REID, TREASURER
OAKLAND COUNTY DEMOCRATIC PARTY
24445 NORTHWESTERN HWY, SUITE 110
SOUTHFIELD, MI 48075

Response Due Date

11/04/2015

IDENTIFICATION NUMBER: C00040857

REFERENCE: AMENDED APRIL MONTHLY REPORT (03/01/2015 - 03/31/2015),
RECEIVED 07/16/2015

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 4 item(s):

1. Your amended report discloses an increase in disbursements totaling \$225,355.59 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)
2. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer name and occupation entries appear on your report and are not considered acceptable: "Bingo Player / Bingo Player," "Information Requested / Information Requested," "Bingo Player / This individual is a Bingo participant," "Bingo Player / Information Requested," and "Bingo Player / Bingo Player."

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information.

OAKLAND COUNTY DEMOCRATIC PARTY

Page 2 of 3

To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

3. Schedule B of your report discloses disbursements to "Non-Voucher Prize Winners" for "Non Voucher Prize Payouts"; however, you have not itemized the individuals who received payment. For each individual or vendor paid in excess of \$200 in a calendar year, a memo entry including the name and address of the individual receiving the prize, as well as the date, amount, amend purpose of the original disbursement must be provided. Please amend your report to include the missing information or provide clarifying information if memo entries are not required. (11 CFR § 104.9)

OAKLAND COUNTY DEMOCRATIC PARTY

Page 3 of 3

4. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "Quick Shot." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at [http://www.fec.gov/law/policy/purposeofdisbursement/inadequate purpose list 3507.pdf](http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf).

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 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) 694-1393.

Sincerely,



Paul Stuetz
Senior Campaign Finance Analyst
Reports Analysis Division

320

MISCELLANEOUS TEXT (FEC Form 99)

This message is in response to the RAI for our amended April 2015 report covering March 2015. Filing an amended report would not provide any of the requested additional information per our responses below.

1. Our amended report shows an increase in disbursements over our original report due to bingo disbursements that did not properly transfer from QuickBooks to NGP on our February 2015 report. The amending of the February report necessitated the filing of amended reports for all following months. Our amendment properly reported the disbursements.

2. The Oakland County Democratic Party has attempted ""best efforts"" to solicit the requested information for all donors mandated by ""11 CFR."" Past attempts to gather this information include: 1) Direct asks by volunteers and paid staff to said donors; 2) Mailings; and 3) Follow up phone calls. It is also worth noting that the vast majority of the individuals who we listed as ""Bingo Player"" have no other source of income (either being retired or a homemaker) which lead to some of the confusion from these individuals as to whom they should list and how we should track employer information. We are currently increasing our efforts now to rectify this for all donors including: 1) Re-educating our volunteers and staff at the Bingo Hall to ensure they are properly assisting us in collecting information through face-to-face efforts requiring individuals to complete a form; 2) Additional monthly mailings to these individuals; 3) Phone calls by volunteers and/or staff.

3. The changes in interpretation of what we were required to do per CFR 11 for the ""Non-Voucher Prize Winners"" has recently been updated after a recently completed audit by the FEC (approved in the summer of 2015 by the Commission). We have fully complied and cooperated with all requests and findings of the Commission and have invested considerable resources to change our entire record-keeping system to an electronic Point-of-Sale and Player ID Card tracking system that should enable detailed reports moving forward.

4. Quick Shot is a type of bingo game. Disbursements for this game will be included in Bingo Supplies in future reports filed after October 2015.

201511029003261268



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

October 5, 2015

PHILLIP W. REID, TREASURER
OAKLAND COUNTY DEMOCRATIC PARTY
24445 NORTHWESTERN HWY, SUITE 110
SOUTHFIELD, MI 48075

Response Due Date

11/09/2015

IDENTIFICATION NUMBER: C00040857

REFERENCE: AMENDED MAY MONTHLY REPORT (04/01/2015 - 04/30/2015),
RECEIVED 09/08/2015

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 4 item(s):

1. Your amended report discloses an increase in disbursements totaling \$35,689.23 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)
2. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer name and occupation entries appear on your report and are not considered acceptable: "Bingo Player / Bingo Player," "Information Requested / Information Requested," "Bingo Player / Information Requested," "Information Requested / This individual is a Bingo participant," "Bingo Player / Binglo Player."

You must provide the missing information; or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information.

OAKLAND COUNTY DEMOCRATIC PARTY

Page 2 of 3

To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

3. Schedule B of your report discloses disbursements to "Non-Voucher Prize Winners" for "Non Voucher Prize Payouts"; however, you have not itemized the individuals who received payment. For each individual or vendor paid in excess of \$200 in a calendar year, a memo entry including the name and address of the individual receiving the prize, as well as the date, amount, amend purpose of the original disbursement must be provided. Please amend your report to include the missing information or provide clarifying information if memo entries are not required. (11 CFR § 104.9)

OAKLAND COUNTY DEMOCRATIC PARTY

Page 3 of 3

4. On Schedule B supporting Line 21(b) of the Detailed Summary Page, your committee discloses disbursements for "Progressive Jackpot Winner" and lists itself "Oakland County Democratic Party" as the payee. Please clarify the nature of this transaction or amend Schedule B by providing the correct name and mailing address of the payee.

If this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

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 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) 694-1393.

Sincerely,



Paul Stetzer
Senior Campaign Finance Analyst
Reports Analysis Division

320

MISCELLANEOUS TEXT (FEC Form 99)

This message is in response to the RFAI for our amended May 2015 report covering April 2015. Filing an amended report would not provide any of the requested additional information per our responses below.

1. Our amended report shows an increase in disbursements over our original report due to bingo disbursements that did not properly transfer from QuickBooks to NGP on our February 2015 report. The amending of the February report necessitated the filing of amended reports for all following months. Our amendment properly reported the disbursements.

2. The Oakland County Democratic Party has attempted ""best efforts"" to solicit the requested information for all donors mandated by ""11 CFR."" Past attempts to gather this information include: 1) Direct asks by volunteers and paid staff to said donors; 2) Mailings; and 3) Follow up phone calls. It is also worth noting that the vast majority of the individuals who we listed as ""Bingo Player"" have no other source of income (either being retired or a homemaker) which lead to some of the confusion from these individuals as to whom they should list and how we should track employer information. We are currently increasing our efforts now to rectify this for all donors including: 1) Re-educating our volunteers and staff at the Bingo Hall to ensure they are properly assisting us in collecting information through face-to-face efforts requiring individuals to complete a form; 2) Additional monthly mailings to these individuals; 3) Phone calls by volunteers and/or staff.

3. The changes in interpretation of what we were required to do per CFR 11 for the ""Non-Voucher Prize Winners"" has recently been updated after a recently completed audit by the FEC (approved in the summer of 2015 by the Commission). We have fully complied and cooperated with all requests and findings of the Commission and have invested considerable resources to change our entire record-keeping system to an electronic Point-of-Sale and Player ID Card tracking system that should enable detailed reports moving forward.

4. (regarding the ""Progressive Jackpot"" Disbursements), these disbursements are for a joint Progressive Bingo jackpot that is between typically several different bingos through our Bingo Hall that our Bingo licenses buy into through 1) A standard startup fee - every time the Progressive goes we pay again for the next jackpot seed money; and 2) We deposit all money into our ""Federal"" Bingo account first - as required by State of Michigan gaming authorities - and then are transferring the future ""winnings"" for the Progressive Jackpot winner into a non-Federal, administrative account that is currently run by the Oakland County Democratic Party for the Hall (for no costs). For years this was administered by the Hall for free to Bingos licenses but they opted out of this responsibility moving forward so the the Oakland County Democratic Party created a non-Federal Bingo admin account for the Hall's Joint ""Progressive"" for all of to put money into and pay out of.

Keep in mind all records for the Progressive Jackpot account are reported to the Michigan Gaming Board and copies of statements, checks and other records are required to be kept at the hall and are reviewed regularly by state gaming regulators. This is a non-Federal activity ran by the Hall that we simply keep an additional bank account for under our DBA (Doing Business As).

1007444001



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

October 7, 2015

PHILLIP W. REID, TREASURER
OAKLAND COUNTY DEMOCRATIC PARTY
24445 NORTHWESTERN HWY, SUITE 110
SOUTHFIELD, MI 48075

Response Due Date

11/12/2015

IDENTIFICATION NUMBER: C00040857

REFERENCE: AMENDED JUNE MONTHLY REPORT (05/01/2015 - 05/31/2015),
RECEIVED 09/08/2015

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 1 item(s):

- Your amended report discloses an increase in disbursements totaling \$26,860.51 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)

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 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) 694-1393.

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OAKLAND COUNTY DEMOCRATIC PARTY

Page 2 of 2

Sincerely,



Paul Stoetzer
Senior Campaign Finance Analyst
Reports Analysis Division

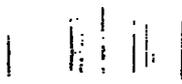
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MISCELLANEOUS TEXT (FEC Form 99)

PAGE 1 / 1

This message is in response to the RFAI for our amended June 2015 report covering May 2015. This information was previously shared on Forms F99 submitted on September 8, 2015 and October 8, 2015.

Our amended report shows an increase in disbursements over our original report as disbursements made to Advance Novelty and claimed in July for June were actually May expenses and should have been claimed in June.



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8. 2015 February Monthly Report: Schedule A supporting Line 11 (a)(i) failed to disclose adequate identification for 245 of 365, or 67.1%, of the contributions from individuals that require itemization.

9. 2015 Amended March Monthly Report: Schedule A supporting Line 11 (a)(i) failed to disclose adequate identification for 235 of 341, or 68.9%, of the contributions from individuals that require itemization.

10. 2015 Amended April Monthly Report: Schedule A supporting Line 11 (a)(i) failed to disclose adequate identification for 383 of 533, or 71.9%, of the contributions from individuals that require itemization.

11. 2015 Amended May Monthly Report: Schedule A supporting Line 11 (a)(i) failed to disclose adequate identification for 385 of 542, or 71.0%, of the contributions from individuals that require itemization.

12. 2015 Amended Year-End Report: Schedule A supporting Line 11 (a)(i) failed to disclose adequate identification for 784 of 1,435, or 54.6%, of the contributions from individuals that require itemization.

13. 2016 Amended March Monthly Report: Schedule A supporting Line 11 (a)(i) failed to disclose adequate identification for 575 of 1,162, or 49.5%, of the contributions from individuals that require itemization.

14. 2016 Amended April Monthly Report: Schedule A supporting Line 11 (a)(i) failed to disclose adequate identification for 77 of 1,439, or 53.8%, of the contributions from individuals that require itemization.

15. 2016 Amended May Monthly Report: Schedule A supporting Line 11 (a)(i) failed to disclose adequate identification for 962 of 1,834 or 52.5%, of the contributions from individuals that require itemization.

16. 2016 Amended June Monthly Report: Schedule A supporting Line 11 (a)(i) failed to disclose adequate identification for 877 of 1,725 or 50.8%, of the contributions from individuals that require itemization.

1004444014

RECEIVED

2016 JUN -6 PM 3:54

NOTIFICATION
CAMPAIGN

Included are the following documents:

RFAI dated 9-27-15 - Amended February 2015 Monthly
Form 99 Response dated 11-2-15 #2

RFAI dated 9-30-15 - Amended March 2015 Monthly
Form 99 Response dated 11-4-15 #2

RFAI dated 9-30-15 - Amended April 2015 Monthly
Form 99 Response dated 11-2-15 #2

RFAI dated 10-5-15 - Amended May 2015 Monthly
Form 99 Response dated 11-9-15 #2

RFAI dated 4-23-17 - Amended Year-End 2015
Form 99 Response dated 4-24-17

RFAI dated 4-27-17 - Amended March 2016 Monthly
Form 99 Response dated 5-24-17
Form 99 Response dated 6-15-17
Form 99 Response dated 6-28-17

RFAI dated 5-3-17 - Amended April 2016 Monthly
Form 99 Response dated 5-24-17
Form 99 Response dated 6-15-17
Form 99 Response dated 6-28-17

RFAI dated 5-2-17 - Amended May 2016 Monthly
Form 99 Response dated 5-24-17
Form 99 Response dated 6-15-17
Form 99 Response dated 6-28-17

RFAI dated 5-3-17 - Amended June 2016 Monthly
Form 99 Response dated 5-24-17
Form 99 Response dated 6-15-17
Form 99 Response dated 6-28-17

Green Acres Bingo Hall Bingo Player Card Application

Amendments were filed on 6-13-17 for March 2016 through June 2016.

In response to the RFAs issued covering the OCDP 2016 monthly reports, March 2016 through June 2016 reports have been amended to include any available updated employer/occupation and address information that was missing from our original reports.

Please see the attached Form 99 Reports dated 5-24-17, 6-15-17 and 6-28-17 for our history and the steps we have taken to address missing employer/occupation information for individual bingo players.

Prior to the summer of 2015, we believed we were following FEC requirements by reporting all transactions over \$50/bingo game. Because of this, we did not keep records on individual bingo players that made contributions under \$50/bingo game. Because it was so difficult to collect information on individual bingo players, we began using "Bingo Player/Bingo Player" for Employer/Occupation. We did this for almost 2 years before our analyst, Paul Stoetzer, informed us in October of 2015 that this wasn't allowed. Our POS system was implemented in September of 2015 (in order to enable us to track individual bingo contributions and disbursements made by bingo players for our Federal bingo activity) and we assigned all of the bingo players that were active at that time a player ID number and card. The problem arose because we were now able to track every transaction for every bingo player but we were missing the Employer/Occupation information for them. After hearing from Mr. Stoetzer that "Bingo Player/Bingo Player" was not acceptable, we began to change the information in NGP to "Information Requested/Information Requested" and began efforts to collect the missing information. We sent letters, made phone calls, searched social media, and gave lists to our bingo hall workers. In December of 2015, we upgraded our NGP system, and now NGP automatically inserted "Information Requested/Information Requested" when Employer/Occupation information was missing. We believed that this was in-line with FEC requirements. Once again, when we found out that it was not, we began updating our NGP database, which contains almost 55,000 contacts.

We would also like to share an example of something that has compounded our percentage of missing information.

We broke down our June 2016 report that covers activity for May 2016. Your records show us as missing 50.8% of the information for individuals requiring itemization.

There were 2318 total contributions made for May 2017.

Those 2318 total contributions were made by 929 different people.

Of those 929 different people, there are currently 127 people missing Employer/Occupation information or 13.67% of the total number of contributors.

Of those 127 people currently missing information, only 70 of those people – or 7.5% of the total number of contributors had contributed \$200 or more total through May 31, 2016.

If you look at the number of individuals, rather than contributions, the missing information rate for June 2016 is 7.5% - far less than the 50.8% based on number of contributions.

We have diligently worked on this issue, spending large amounts of time and money to raise our accuracy rates and we believe that we have made great progress. We have responded to the multiple requests from our current analyst, Nicole Miller, who had much different requirements than those

communicated to us by Mr. Stotzer. We hope that our efforts will encourage you to refrain from taking further action against us.

11004444001



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 27, 2015

PHILLIP W. REID, TREASURER
OAKLAND COUNTY DEMOCRATIC PARTY
24445 NORTHWESTERN HWY, SUITE 110
SOUTHFIELD, MI 48075

Response Due Date

11/02/2015

IDENTIFICATION NUMBER: C00040857

REFERENCE: AMENDED FEBRUARY MONTHLY REPORT (01/01/2015 - 01/31/2015),
RECEIVED 07/16/2015

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 4 item(s):

1. Your amended report discloses an increase in disbursements totaling \$180,854.77 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)
2. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer name and occupation entries appear on your report and are not considered acceptable: "Bingo Player / Bingo Player," "Bingo Player / Information Requested," "Bingo Player / Binglo Player," and "Information Requested / Information Requested."

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed

OAKLAND COUNTY DEMOCRATIC PARTY

Page 2 of 3

description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

3. Schedule B of your report discloses disbursements to "Non-Voucher Prize Winners" for "Non Voucher Prize Payouts"; however, you have not itemized the individuals who received payment. For each individual or vendor paid in excess of \$200 in a calendar year, a memo entry including the name and address of the individual receiving the prize, as well as the date, amount, amend purpose of the original disbursement must be provided. Please amend your report to include the missing information or provide clarifying information if memo entries are not required. (11 CFR § 104.9)

OAKLAND COUNTY DEMOCRATIC PARTY

Page 3 of 3

4. Your report does not include a Schedule H1 to disclose the ratio for the allocation of certain costs. For State, District and Local party committees, Schedule H1 must be filed in the first report each calendar year that discloses an allocable disbursement. Further, all shared administrative, generic voter drive and exempt activity costs incurred during the two-year cycle must be allocated according to the appropriate fixed ratio, unless the federal account elects to pay a higher percentage of its cost. (11 CFR §§106.7(d)(2) and (3))

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 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) 694-1393.

Sincerely,



Paul Stoetzer
Senior Campaign Finance Analyst
Reports Analysis Division

320

MISCELLANEOUS TEXT (FEC Form 99)

Response to RAI for FEC-1015850 Amendment

This message is in response to the RAI for our amended February 2015 report covering January 2015.

1. Our amended report shows an increase in disbursements over our original report due to bingo disbursements that did not properly transfer from QuickBooks to NGP. Our amendment properly reported the disbursements. This issue was addressed in our Form 99 filed on September 28, 2015.

2. The Oakland County Democratic Party has attempted ""best efforts"" to solicit the requested information for all donors mandated by ""11 CFR."" Past attempts to gather this information include: 1) Direct asks by volunteers and paid staff to said donors; 2) Mailings; and 3) Follow up phone calls. It is also worth noting that the vast majority of the individuals who we listed as ""Bingo Player"" have no other source of income (either being retired or a homemaker) which lead to some of the confusion from these individuals as to whom they should list and how we should track employer information. We are currently increasing our efforts now to rectify this for all donors including: 1) Re-educating our volunteers and staff at the Bingo Hall to ensure they are properly assisting us in collecting information through face-to-face efforts requiring individuals to complete a form; 2) Additional monthly mailings to these individuals; 3) Phone calls by volunteers and/or staff.

3. The changes in interpretation of what we were required to do per CFR 11 for the ""Non-Voucher Prize Winners"" has recently been updated after a recently completed audit by the FEC (approved in the summer of 2015 by the Commission). We have fully complied and cooperated with all requests and findings of the Commission and have invested considerable resources to change our entire record-keeping system to an electronic Point-of-Sale and Player ID Card tracking system that should enable detailed reports moving forward.

4. Our H1 was filed on 3-19-15 with our March 2015 report for February 2015 when we were made aware that it had not been filed in February. This was also addressed in our Form 99 filed on September 28, 2015.

11207444001



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 30, 2015

PHILLIP W. REID, TREASURER
OAKLAND COUNTY DEMOCRATIC PARTY
24445 NORTHWESTERN HWY, SUITE 110
SOUTHFIELD, MI 48075

Response Due Date

11/04/2015

IDENTIFICATION NUMBER: C00040857

REFERENCE: AMENDED MARCH MONTHLY REPORT (02/01/2015 - 02/28/2015),
RECEIVED 07/16/2015

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 5 item(s):

1. Your amended report discloses an increase in disbursements totaling \$355,689.84 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)
2. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer name and occupation entries appear on your report and are not considered acceptable: "Bingo Player / Bingo Player," "Bingo Player / This individual is a Bingo participant," "Information Requested / Information Requested," "Bingo Player / Information Requested," "Information Requested / Student," and "Bingo Player / Binglo Player."

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information.

10044444001

OAKLAND COUNTY DEMOCRATIC PARTY

Page 2 of 4

To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

3. Schedule B of your report discloses disbursements to "Non-Voucher Prize Winners" for "Non Voucher Prize Payouts"; however, you have not itemized the individuals who received payment. For each individual or vendor paid in excess of \$200 in a calendar year, a memo entry including the name and address of the individual receiving the prize, as well as the date, amount, amend purpose of the original disbursement must be provided. Please amend your report to include the missing information or provide clarifying information if memo entries are not required. (11 CFR § 104.9)

OAKLAND COUNTY DEMOCRATIC PARTY

Page 3 of 4

4. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "Quick Shot." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf.

5. On Schedule H1 of your report, you have checked an incorrect fixed percentage for your allocated federal and non-federal administrative, generic voter drive and exempt activity costs. The fixed percentage for these costs is based on whether a Presidential and/or a Senate candidate appear on the State's ballot. Please amend your report to include a corrected Schedule H1 and note that a change in this ratio may make it necessary to repay your non-federal account for any overpayments that may have been made. While the Commission may take further legal action concerning any impermissible overpayments by the non-federal account, your prompt action will be taken into consideration. (11 CFR §106.7(d)(2) and (3))

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 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) 694-1393.

OAKLAND COUNTY DEMOCRATIC PARTY

Page 4 of 4

Sincerely,



Paul Stoetzer

Senior Campaign Finance Analyst
Reports Analysis Division

320

10101511110101

MISCELLANEOUS TEXT (FEC Form 99)

PAGE 1 / 1

This message is in response to the RAI for our amended March 2015 report covering February 2015. Filing an amended report would not provide any of the requested additional information per our responses below.

1. Our amended report shows an increase in disbursements over our original report due to bingo disbursements that did not properly transfer from QuickBooks to NGP on our February 2015 report. The amending of the February report necessitated the filing of amended reports for all following months. Our amendment properly reported the disbursements.

2. The Oakland County Democratic Party has attempted ""best efforts"" to solicit the requested information for all donors mandated by ""11 CFR."" Past attempts to gather this information include: 1) Direct asks by volunteers and paid staff to said donors; 2) Mailings; and 3) Follow up phone calls. It is also worth noting that the vast majority of the individuals who we listed as ""Bingo Player"" have no other source of income (either being retired or a homemaker) which lead to some of the confusion from these individuals as to whom they should list and how we should track employer information. We are currently increasing our efforts now to rectify this for all donors including: 1) Re-educating our volunteers and staff at the Bingo Hall to ensure they are properly assisting us in collecting information through face-to-face efforts requiring individuals to complete a form; 2) Additional monthly mailings to these individuals; 3) Phone calls by volunteers and/or staff.

3. The changes in interpretation of what we were required to do per CFR 11 for the ""Non-Voucher Prize Winners"" has recently been updated after a recently completed audit by the FEC (approved in the summer of 2015 by the Commission). We have fully complied and cooperated with all requests and findings of the Commission and have invested considerable resources to change our entire record-keeping system to an electronic Point-of-Sale and Player ID Card tracking system that should enable detailed reports moving forward.

4. Quick Shot is a type of bingo game. Disbursements for this game will be included in Bingo Supplies in future reports filed after October 2015.

5. We will file an amended H1 report to reflect the correct percentage of 15%. - 28702

110317414001



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 30, 2015

PHILLIP W. REID, TREASURER
OAKLAND COUNTY DEMOCRATIC PARTY
24445 NORTHWESTERN HWY, SUITE 110
SOUTHFIELD, MI 48075

Response Due Date

11/04/2015

IDENTIFICATION NUMBER: C00040857

REFERENCE: AMENDED APRIL MONTHLY REPORT (03/01/2015 - 03/31/2015),
RECEIVED 07/16/2015

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 4 item(s):

1. Your amended report discloses an increase in disbursements totaling \$225,355.59 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)
2. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer name and occupation entries appear on your report and are not considered acceptable: "Bingo Player / Bingo Player," "Information Requested / Information Requested," "Bingo Player / This individual is a Bingo participant," "Bingo Player / Information Requested," and "Bingo Player / Bingle Player."

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information.

OAKLAND COUNTY DEMOCRATIC PARTY

Page 2 of 3

To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

3. Schedule B of your report discloses disbursements to "Non-Voucher Prize Winners" for "Non Voucher Prize Payouts"; however, you have not itemized the individuals who received payment. For each individual or vendor paid in excess of \$200 in a calendar year, a memo entry including the name and address of the individual receiving the prize, as well as the date, amount, amend purpose of the original disbursement must be provided. Please amend your report to include the missing information or provide clarifying information if memo entries are not required. (11 CFR § 104.9)

OAKLAND COUNTY DEMOCRATIC PARTY

Page 3 of 3

4. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "Quick Shot." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf.

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 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) 694-1393.

Sincerely,



Paul Stoetzer
Senior Campaign Finance Analyst
Reports Analysis Division

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

October 5, 2015

PHILLIP W. REID, TREASURER
OAKLAND COUNTY DEMOCRATIC PARTY
24445 NORTHWESTERN HWY, SUITE 110
SOUTHFIELD, MI 48075

Response Due Date

11/09/2015

IDENTIFICATION NUMBER: C00040857

REFERENCE: AMENDED MAY MONTHLY REPORT (04/01/2015 - 04/30/2015),
RECEIVED 09/08/2015

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 4 item(s):**

1. Your amended report discloses an increase in disbursements totaling \$35,689.23 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)
2. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer name and occupation entries appear on your report and are not considered acceptable: "Bingo Player / Bingo Player," "Information Requested / Information Requested," "Bingo Player / Information Requested," "Information Requested / This individual is a Bingo participant," "Bingo Player / BINGO Player."

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information.

OAKLAND COUNTY DEMOCRATIC PARTY

Page 2 of 3

To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process:

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

3. Schedule B of your report discloses disbursements to "Non-Voucher Prize Winners" for "Non Voucher Prize Payouts"; however, you have not itemized the individuals who received payment. For each individual or vendor paid in excess of \$200 in a calendar year, a memo entry including the name and address of the individual receiving the prize, as well as the date, amount, amend purpose of the original disbursement must be provided. Please amend your report to include the missing information or provide clarifying information if memo entries are not required. (11 CFR § 104.9)

OAKLAND COUNTY DEMOCRATIC PARTY

Page 3 of 3

4. On Schedule B supporting Line 21(b) of the Detailed Summary Page, your committee discloses disbursements for "Progressive Jackpot Winner" and lists itself "Oakland County Democratic Party" as the payee. Please clarify the nature of this transaction or amend Schedule B by providing the correct name and mailing address of the payee.

If this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

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 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) 694-1393.

Sincerely,



Paul Stoetzer
Senior Campaign Finance Analyst
Reports Analysis Division

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MISCELLANEOUS TEXT (FEC Form 99)

PAGE 1 / 1

This message is in response to the RFAI for our amended May 2015 report covering April 2015. Filing an amended report would not provide any of the requested additional information per our responses below.

1. Our amended report shows an increase in disbursements over our original report due to bingo disbursements that did not properly transfer from QuickBooks to NGP on our February 2015 report. The amending of the February report necessitated the filing of amended reports for all following months. Our amendment properly reported the disbursements.

2. The Oakland County Democratic Party has attempted "best efforts" to solicit the requested information for all donors mandated by "11 CFR." Past attempts to gather this information include: 1) Direct asks by volunteers and paid staff to said donors; 2) Mailings; and 3) Follow up phone calls. It is also worth noting that the vast majority of the individuals who we listed as "Bingo Player" have no other source of income (either being retired or a homemaker) which lead to some of the confusion from these individuals as to whom they should list and how we should track employer information. We are currently increasing our efforts now to rectify this for all donors including: 1) Re-educating our volunteers and staff at the Bingo Hall to ensure they are properly assisting us in collecting information through face-to-face efforts requiring individuals to complete a form; 2) Additional monthly mailings to these individuals; 3) Phone calls by volunteers and/or staff.

3. The changes in interpretation of what we were required to do per CFR 11 for the "Non-Voucher Prize Winners" has recently been updated after a recently completed audit by the FEC (approved in the summer of 2015 by the Commission). We have fully complied and cooperated with all requests and findings of the Commission and have invested considerable resources to change our entire record-keeping system to an electronic Point-of-Sale and Player ID Card tracking system that should enable detailed reports moving forward.

4. (regarding the "Progressive Jackpot" Disbursements), these disbursements are for a joint Progressive Bingo jackpot that is between typically several different bingos through our Bingo Hall that our Bingo licenses buy into through 1) A standard startup fee - every time the Progressive goes we pay again for the next jackpot seed money; and 2) We deposit all money into our "Federal" Bingo account first - as required by State of Michigan gaming authorities - and then are transferring the future "winnings" for the Progressive Jackpot winner into a non-Federal, administrative account that is currently run by the Oakland County Democratic Party for the Hall (for no costs). For years this was administered by the Hall for free to Bingos licenses but they opted out of this responsibility moving forward so the the Oakland County Democratic Party created a non-Federal Bingo admin account for the Hall's Joint "Progressive" for all of to put money into and pay out of.

Keep in mind all records for the Progressive Jackpot account are reported to the Michigan Gaming Board and copies of statements, checks and other records are required to be kept at the hall and are reviewed regularly by state gaming regulators. This is a non-Federal activity ran by the Hall that we simply keep an additional bank account for under our DBA (Doing Business As).



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 23, 2017

PHILLIP W. REID, TREASURER
OAKLAND COUNTY DEMOCRATIC PARTY
17100 W. 12 MILE RD. SUITE 5
SOUTHFIELD, MI 48076

Response Due Date
05/30/2017

IDENTIFICATION NUMBER: C00040857

REFERENCE: AMENDED YEAR-END REPORT (12/01/2015 - 12/31/2015), RECEIVED
06/26/2016

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 2 item(s):

1. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in an election cycle. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer and occupation entries appear on your report and are not considered acceptable: "Bingo Player/Bingo Player," "Info Requested/Info Requested," "Informaiton Requested/Informaiton Requested," "Information Requested/Information Requested," "N/A/N/A," and "None/None."

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts" you must provide the Commission with a detailed description of your procedures for requesting the information.

The Commission notes that the Committee previously submitted a description of its "best efforts" procedures. These procedures were deemed incomplete for the following reason(s):

Your original solicitation and follow-up requests for contributor information

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OAKLAND COUNTY DEMOCRATIC PARTY

Page 2 of 3

- did not contain a clear and conspicuous request for the contributor information. (11 CFR § 104.7(b)(1))
- did not clearly ask for the missing information without soliciting a contribution. (11 CFR § 104.7(b)(2))
- did not inform the contributor of the requirements of federal law for reporting of such information. (11 CFR § 104.7(b)(1)(i))
- did not include a pre-addressed post card or return envelope. (11 CFR § 104.7(b)(2))
- was not made within 30 days of receiving the contribution. (11 CFR § 104.7(b)(2))
- did not indicate that you would update your reports to include the missing information. (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information and a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts", please refer to the Campaign Guide.

2. Your Amended November Monthly (10/1/15-10/31/15), received 6/9/16, Amended December Monthly (11/1/15-11/30/15), received 6/26/16, and Amended Year-End (12/1/15-12/31/15), received 6/26/16 Reports combined do not disclose any payments for salary or wages on Schedule B supporting Line 30(b) of the Detailed Summary Page. 11 CFR §100.24 defines as Federal Election Activity, services provided by an employee of a State, district or local party committee who spends more than 25 percent of their time during that month on activities in connection with a Federal election. You are advised that payments for salaries and wages for employees who spend more than 25 percent of their compensated time in a given month on Federal Election Activity or activities in connection with a Federal election must be made with Federal funds only. Please provide clarification regarding the lack of payments for salary and wages disclosed by your committee.

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 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)

OAKLAND COUNTY DEMOCRATIC PARTY

Page 3 of 3

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. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. 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) 694-1164.

Sincerely,



Nicole Miller
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

317

MISCELLANEOUS TEXT (FEC Form 99)

NAME OF COMMITTEE (In Full)
Oakland County Democratic Party

FEC IDENTIFICATION NUMBER
C00040857

Mailing Address **17100 W. 12 Mile Rd.**
Suite 5

City **Southfield** State **MI** ZIP Code **48076**

Regarding RFAI Dated 4-23-17 for Amended Year-End Report (12/01/2015 - 12/31/2015), Received 6-26-16

Over the last 24 months, the Oakland County Democratic Party has devoted a significant amount of time to trying to obtain employment and address information for our bingo players. We have done the following:

- 1. Every new bingo player is required to fill out a paper voucher that asks for address and employment information. This information is entered monthly into NGP prior to the filing of each monthly FEC report.**
- 2. Our workers at the bingo hall are given lists of players with missing information. If a bingo player returns to the hall to play again, they are asked for the missing information.**
- 3. Letters are mailed out to those that we have address information for.**
- 4. Internet searches are performed checking on Facebook and LinkedIn, as well as on Whitepages.com and other sites that provide personal information.**
- 5. Phone calls are made if we are able to obtain a phone number.**

All of these activities are ongoing.

There are a lot of bingo players. Many do not play on a regular basis. We also have a large number of players that only play once and never return to the bingo hall. These things make it more difficult to obtain the information but we are committed to making every effort to do so.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 27, 2017

PHILLIP W. REID, TREASURER
OAKLAND COUNTY DEMOCRATIC PARTY
17100 W. 12 MILE RD. SUITE 5
SOUTHFIELD, MI 48076

Response Due Date
06/01/2017

IDENTIFICATION NUMBER: C00040857

REFERENCE: AMENDED MARCH MONTHLY REPORT (02/01/2016 - 02/29/2016),
RECEIVED 06/14/2016

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 1 item(s):

- Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), **complete mailing address**, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer name and occupation entries appear on your report and are not considered acceptable: "Info Requested/Info Requested," "Informaiton Requested/Informaiton Requested," "Information Requested/Information Requested," and "None/None."

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the

OAKLAND COUNTY DEMOCRATIC PARTY

Page 2 of 3

requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

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 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. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. 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) 694-1164.

OAKLAND COUNTY DEMOCRATIC PARTY

Page 3 of 3

Sincerely,



Nicole Miller
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

317

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 3, 2017

PHILLIP W. REID, TREASURER
OAKLAND COUNTY DEMOCRATIC PARTY
17100 W. 12 MILE RD. SUITE 5
SOUTHFIELD, MI 48076

Response Due Date
06/07/2017

IDENTIFICATION NUMBER: C00040857

REFERENCE: AMENDED APRIL MONTHLY REPORT (03/01/2016 - 03/31/2016),
RECEIVED 06/14/2016

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 1 item(s):

- Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer name and occupation entries appear on your report and are not considered acceptable: "Info Requested/Info Requested," "Informaiton Requested/Informaiton Requested," "Information Requested/Information Requested," and "None/None"

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the

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OAKLAND COUNTY DEMOCRATIC PARTY

Page 2 of 3

requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

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 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. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. 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) 694-1164.

OAKLAND COUNTY DEMOCRATIC PARTY

Page 3 of 3

Sincerely,



Nicole Miller
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

317

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 2, 2017

PHILLIP W. REID, TREASURER
OAKLAND COUNTY DEMOCRATIC PARTY
17100 W. 12 MILE RD. SUITE 5
SOUTHFIELD, MI 48076

Response Due Date
06/06/2017

IDENTIFICATION NUMBER: C00040857

REFERENCE: AMENDED MAY MONTHLY REPORT (04/01/2016 - 04/30/2016),
RECEIVED 06/14/2016

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 1 item(s):

- Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer name and occupation entries appear on your report and are not considered acceptable: "Bingo Player/Bingo Player," "Information Requested/Cashier," "Macomb Family Services/DCW," "Info Requested/Info Requested," "Informaiton Requested/Informaiton Requested," "Information Requested/Information Requested," "N/A /N/A," "None/None," and "Information Requested/Sales"

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements

OAKLAND COUNTY DEMOCRATIC PARTY

Page 2 of 3

of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

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 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. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. 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

OAKLAND COUNTY DEMOCRATIC PARTY

Page 3 of 3

Analysis Division) or my local number (202) 694-1164.

Sincerely,



Nicole Miller
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

317

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 3, 2017

PHILLIP W. REID, TREASURER
OAKLAND COUNTY DEMOCRATIC PARTY
17100 W. 12 MILE RD. SUITE 5
SOUTHFIELD, MI 48076

Response Due Date

06/07/2017

IDENTIFICATION NUMBER: C00040857

REFERENCE: AMENDED JUNE MONTHLY REPORT (05/01/2016 - 05/31/2016),
RECEIVED 12/08/2016

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 1 item(s):

- Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer name and occupation entries appear on your report and are not considered acceptable: "Macomb Family Services/DCW," "Info Requested/Info Requested," "Informaiton Requested/Informaiton Requested," "Information Requested/Information Requested," "Self-Employed/Information Requested," "N/A/N/A," "None/None," and "Information Requested/Sales."

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See

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OAKLAND COUNTY DEMOCRATIC PARTY

Page 2 of 3

11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

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 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. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. 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) 694-1164.

MISCELLANEOUS TEXT (FEC Form 99)

PAGE 1 / 4

NAME OF COMMITTEE (In Full)
Oakland County Democratic Party

FEC IDENTIFICATION NUMBER
C00040857

Mailing Address 17100 W. 12 Mile Rd.
Suite 5

City	State	ZIP Code
Southfield	MI	48076

In response to the RFAs issued covering our 2015 Year-End and 2016 monthly reports, (201704230300084890, 201704270300085290, 201704270300085293, 201705020300085856, 201705030300085973, 201705030300085999, 201705100300086396, 201705100300086399, 201705100300086402, 201705150300086513, 201705150300086516, 201705160300086548) the Oakland County Democratic Party (a.k.a. OCDP) would like to state the following:

These RFA's all refer to bingo players that participate in State of Michigan regulated bingo games where the OCDP has implemented a system with the goal of tracking every Federal dollar in and every Federal dollar out to ensure accuracy and transparency in our FEC monthly reports. We have successfully integrated the interface of our point-of-sale (POS), NGP VAN (a.k.a. NGP) and the FEC systems to be able to provide this information. We were in regular contact with our previous FEC analyst and were under the assumption that we were following FEC requirements and Federal election law, having received no RFAs for almost a year. At the direction of our former FEC analyst, we submitted a Form 99 at the end of 2016 outlining our best efforts to obtain missing employer and occupation information. We believed our statement explaining our best efforts was acceptable to our former analyst. These bingo players seek bingo entertainment and are not intentionally supporting a political party committee

After discussions with our current analyst, we have been made aware that:

1. Our best efforts statement is not acceptable and we need to be specific about our efforts;
2. The employer and occupation information that we enter directly from the vouchers that are completed by the bingo players is often not acceptable due to abbreviations and/or incomplete information being provided;
3. We should have been amending monthly reports as missing information was collected and entered into NGP.

We would like to respond to these issues:

1. We were not aware that our Form 99 statement was unacceptable and we will re-write it to include specific information about our efforts to obtain the missing information. Per FEC requirements, we did send letters with pre-addressed envelopes to those donors with missing information. The letters were only seeking missing information, not additional contributions. There was very little response to these efforts. We also attempted to obtain the information through a variety of other ways.
2. We did not know that the information we received directly from donors was not acceptable. We entered exactly what the bingo players wrote on the vouchers into NGP. We have made the workers at the bingo hall aware that abbreviations are not acceptable; that None and N/A are not acceptable; and that all self-employed individuals must disclose their line of business. Direction has been given to our bingo workers that NO new player cards should be issued if any of the required information is missing on the newly named ?Bingo Card Application Request? form. The following statement from FEC 11 CFR 104.7 has been added to the new form ? "Federal Law REQUIRES us to use our best efforts to collect and report the Name, Mailing Address, Occupation and Name of Employer of individuals whose contributions exceed \$200 in a calendar year.? This statement has also been posted on signs at the bingo hall.
3. Amending our 2016 reports to provide the updated information at this point does not seem to be possible. Since we updated bingo player information as we received it throughout the year, and were not aware that we should have kept a record of changes, we have no way of pinpointing when the information was updated. In 2016 NGP had a major software update and the FEC has now had a major update of its software in 2017. We have very good reason to believe that amending reports going back to the 2015 Year-End could result in many unanticipated errors in monthly

MISCELLANEOUS TEXT (FEC Form 99)

NAME OF COMMITTEE (In Full)
Oakland County Democratic Party

FEC IDENTIFICATION NUMBER
C00040857

Mailing Address 17100 W. 12 Mile Rd.
Suite 5

City State ZIP Code
Southfield MI 48076

calculations and other report variables.

We have recently made a change in NGP. NGP allows the option of including in the FEC report only those donors that have contributed over \$200 for the calendar year. That option was used for the May 2017 report for April 2017, cutting 400 pages from our report. Up to this point, \$0 was used as the threshold. This option caused players to be included in our reports that contributed as little as \$2.00. Changing the threshold will contribute to further accuracy by excluding those donors that the FEC does not require to be included.

Our error rate is compounded by the fact that each bingo contribution and disbursement (bingo win) must be recorded separately. If a bingo player with missing information plays bingo multiple times throughout the month, it appears that multiple people are missing required information rather than only the one actual bingo player. In discussing this with our analyst, there seems to be no way to reconcile this to lower our error rate.

Since there appears to be no way to provide to the FEC a separate document with all of our bingo players and their information that was updated throughout 2016 through 2017, we would like to request that we are allowed to provide monthly updates moving forward. We did everything our previous FEC analyst asked of us, believing we were in compliance with FEC requirements.

At the request of our current analyst, we would like to provide the following background information regarding Oakland County Democratic Party's efforts over the last 3 years to provide accurate and transparent information to the FEC.

Our Bookkeeper (Karen Miller) and Treasurer (Phil Reid) are both proactive and diligent, pay attention to details, are organized and transparent and had regular contact with our former FEC analyst to ensure we complied. Our goals have been to:

- ? Ensure consistent, prompt, clear and transparent communication with the FEC and within our Committee organization ? which generally has included monthly check-in calls;
? Develop new technologies and interfaces for collecting and reporting relevant financial information to the highest degree of specificity possible ? and/or realigning what are Federal and non-Federal activities to ensure we are following both the letter and spirit of the laws of the State of Michigan and Federal law; and
? Submit accurate and transparent monthly FEC reports including complete address, and employer and occupation information for our donors.

Our systems and processes have had to change several times over the last few years to ensure that we complied with both State of Michigan gaming laws (which apply to our bingo fundraising) and FEC directives. We utilize NGP as our primary interface for creating, filing, and amending our FEC reports. It also serves as our database for donor records and other income, as well as our Customer Relationship Management (CRM) system. Based on results from an audit and the FEC's Early Commission Consideration Process*, the following actions have been taken by OCDP:

- ? The OCDP worked through the FEC's Early Commission Consideration Process* and waived our right to appeal the findings to provide clarity for these Bingo issues as quickly as possible.
? The OCDP worked with our Bingo Hall to institute a new ?Player Card? system where all players have a personalized card for our games which links player transactions for both contributions and disbursements to our Point-Of-Sale (POS) system (effective September 2015)**
? The OCDP worked with our POS/Bingo vendors (Video King and Advance Novelty) and NGP to customize our interfaces for uploads, downloads, reports and other info to ensure every dollar in and out is tracked and

MISCELLANEOUS TEXT (FEC Form 99)

PAGE 3 / 4

NAME OF COMMITTEE (In Full)
Oakland County Democratic Party

FEC IDENTIFICATION NUMBER
C00040857

Mailing Address 17100 W. 12 Mile Rd.
Suite 5

City State ZIP Code
Southfield MI 48076

attributed to a player.

? Between the OCDP, the Bingo Hall and the Vendors there has been significant time and financial investments made to make these systems work - over \$10,000 in staff time and technology improvements. Many hours were also spent working with NGP staff to be able to develop processes to integrate the POS system report information with NGP data and ultimately create accurate FEC monthly reports.

? All Bingo workers (volunteers and staff) have gone through training, re-training, increased oversight and management to ensure the POS/ID system and other changes in the operation of the Bingo games are compliant.

? Mr. Frank Houston (former OCDP Chair) worked with Michigan State Gaming authorities and the FEC in dividing gaming activities into Federal and Non-Federal activities to the satisfaction of both the FEC and Michigan Gaming Department to ensure that our patrons, staff and FEC analysts could implement and assess our compliance with the FEC findings for our Bingo as previously described. The results have included us forfeiting potential Federal Income for thousands of monthly \$1 transactions and small (under \$50, often \$1) ?payouts? for players of ?Charitable Gaming Tickets,? as well as losing patrons due to the rigorous reporting requirements compared with other gaming establishments.

In summary, to properly collect and report our Income we:

- 1) Use a Point-of-Sale (POS) system to track individual income from our Federal Bingo fundraising games which then (through roughly 24 individual monthly reports), are transferred into Excel; customized and then uploaded into NGP.
- 2) Directly update NGP for more detailed Bingo player info as well as any other contributions received from more traditional fundraising events, membership and the like. This typically is happening throughout the month.
- 3) Manually review, edit and correct info in NGP when we upload it to the FEC report as needed.
- 4) Attempt to contact donors who are missing information through mail, and when possible, by phone (primarily Bingo patrons are these instances).

In summary, to properly collect and report our Expenses and Disbursements we:

- 1) Use a Point-of-Sale (POS) system to track individual disbursements to Bingo winners from our Federal Bingo fundraising games which then (through roughly 24 individual reports), are transferred into Excel; customized and then uploaded into NGP.
- 2) Directly update NGP for more detailed Bingo player info. This happens throughout the month.
- 3) Manually, review, edit and correct info in NGP when we upload it to the FEC report as needed.
- 4) Manually enter all Expense and Disbursement information for non-Bingo winner disbursements directly into NGP

*Before the approval of our Final 2011-2012 Audit, we believed that the vast majority of our transactions at our Bingo Hall had a lower threshold of reporting due to the gaming activities being previously considered to be three separate ?games? that went without challenge by the FEC for well over a decade. During the Audit we submitted a ?Request for Early Commission Consideration of a Legal Question? pertaining to what recordkeeping requirements under 52 U.S.C. 30102

? and 11 CFR 102.9 (a) applied to contributions to the OCDP during our Bingo games. A subsequent request was made to

MISCELLANEOUS TEXT (FEC Form 99)

NAME OF COMMITTEE (In Full)
Oakland County Democratic Party

FEC IDENTIFICATION NUMBER
C00040857

Mailing Address 17100 W. 12 Mile Rd.
Suite 5

City State ZIP Code
Southfield MI 48076

the Commission, specifically asking whether OCDP's Bingo games consisting of three separate fundraising events ran concurrently were a single event or not under 11 CFR 102.9 (a).

The Commission concluded in the directive 69 Guidance and on the Request Legal Consideration that OCDP's Bingo activities did not constitute three separate fundraising events and that the OCDP was required to itemize all contributions exceeding \$50 received per session (which included all three games).

This change, as well as the sheer number of Bingo players that the OCDP is now responsible for, has proven difficult to secure all required information for our Bingo players (donors) despite best practices. Due to this difficulty, Ms. Miller began inserting 'Bingo Player' in the occupation and employer sections in 2014. This was done for almost 2 years before she was made aware by our analyst in October of 2015 that this was unacceptable. After we were made aware of this issue, we removed 'Bingo Player' and replaced it with 'Info Requested/Info Requested?' or 'Information Requested/Information Requested?' while we made multiple attempts in multiple ways to obtain the required information. Our upgraded NGP system (upgraded in December 2015) also automatically inserts 'Information Requested?' when the employer and or occupation information is missing, making it more difficult for us to track donors with missing information.

**In the Fall of 2015, after working with our bingo vendors, a Point of Sale (POS) system was implemented to create a more accurate process for tracking all bingo player contributions and disbursements. We have attempted to create a sophisticated recordkeeping system for our Bingo operation. Implementing a sophisticated recordkeeping system including 'Player Cards' and a POS system for what in the Bingo culture are generally cash games, has been a difficult cultural shift for our Bingo patrons, staff, volunteers and vendors. Every Bingo player is required to fill out a paper ('Voucher?') with all information the FEC needs on the player such as address and employment information. They are then given a 'player card?' with a unique tracking number. The player name and number is manually entered into the POS system at the bingo hall. The vouchers are picked up weekly from the bingo hall and the additional player information on the vouchers is inputted into NGP (this includes address, employer info and so on). Our Bookkeeper remotely accesses the POS system at the bingo hall where reports on each of the approximately 24 monthly bingos can be generated. She then has to download the roughly 24 individual disbursement and 24 contribution reports from each Bingo session (we have now 5 sessions a week) and then has to adjust the data in excel sheets to ensure it can be uploaded into NGP. There are then issues with duplicate records still being created by the supplier POS and other issues to work through. This causes additional time to be spent merging duplicates and entering any new bingo player information received through mailings, phone calls, etc. Some bingo players are also hesitant about providing any personal information thus making the process even more difficult.

MISCELLANEOUS TEXT (FEC Form 99)

PAGE 1 / 2

NAME OF COMMITTEE (In Full)
Oakland County Democratic PartyFEC IDENTIFICATION NUMBER
C00040857Mailing Address 17100 W. 12 Mile Rd.
Suite 5City State ZIP Code
Southfield MI 48076

In response to the RFAIs issued covering the Oakland County Democratic Party's 2016 monthly reports, we have amended all of our 2016 reports to include any available updated employer/occupation and address information that was missing from our original reports.

In our efforts to provide adequate monthly reports to the FEC and establish best efforts, we have taken the following actions:

1. All new bingo players are **REQUIRED** to provide address and employer/occupation information on a revised Bingo Player Card Application before they are given a bingo player card. The application includes the FEC recommended statement ?

****Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions exceed \$200 in a calendar year.**

If a new bingo player refuses to provide the required information, they will be denied the opportunity to play bingo.

2. Signs are posted in the bingo hall that include the FEC recommended statement ?

****Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions exceed \$200 in a calendar year.**

3. Letters and pre-addressed return envelopes have been sent to all bingo players that have not provided employer/occupation information and to those that have ?Information Requested/Information Requested?, ?Info Requested/Info Requested?, ?N/A/N/A?, ?None/None?, or any other derivatives or misspellings of these words. These letters only ask for the missing employer/occupation information and are **NOT** letters soliciting additional contributions. We have received little response to these letters but we will continue to send them monthly (to meet the 30 day FEC requirement) to those individuals that have not provided the missing information. Since some bingo players come intermittently and since our previous FEC analyst accepted our reports as filed, it may take some time to update everyone in our system but we will make every effort to do so.

For the 2015-16 cycle, OCDP regularly sent letters with pre-addressed return envelopes to bingo players missing employer/occupation information. Those letters only asked for the missing employer/occupation information and did **NOT** solicit additional contributions. We received little response to the letters but sent them throughout the cycle.

We used ?Bingo Player/Bingo Player? for Employer/Occupation for almost 2 years before our previous analyst informed us that it was unacceptable. We have made every effort to provide updated information for those formerly classified as ?Bingo Player/Bingo Player?.

4. As was done during the 2015-16 cycle, bingo hall workers have been given a list of those bingo players that are missing required FEC information and the bingo hall workers directly ask for the missing information if the players return to the hall. The bingo hall workers do **NOT** solicit additional contributions, they merely ask for the missing information as is required by the FEC.

Now that we know that ?Information Requested/Information Requested? is inadequate, bingo hall workers have been given an updated list. They have been asked to make their best efforts to obtain the missing information if players with missing information return to the bingo hall.

We will continue to have the bingo hall workers do this monthly (to meet the 30 day FEC requirement).

MISCELLANEOUS TEXT (FEC Form 99)

NAME OF COMMITTEE (in Full)
Oakland County Democratic Party

FEC IDENTIFICATION NUMBER
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Mailing Address 17100 W. 12 Mile Rd.
Suite 5

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Southfield MI 48076

5. At the request of our new FEC analyst, we will no longer use abbreviations, even though that is the information that has been provided directly by the bingo players on the former voucher forms ? i.e. CSR for Customer Service Representative; DMC for Detroit Medical Center; DPS for Detroit Public Schools; DCW for Direct Care Worker; GM for General Motors. Bingo hall workers have been advised that abbreviations are unacceptable and that they are required to inform bingo players of the same. We have made every effort to update this information in NGP.

6. At the request of our new FEC analyst, we will now ask self-employed individuals to provide their occupation rather than just stating that they are self-employed. Bingo hall workers have been advised that an occupation is required for self-employed individuals and they will do their best to obtain that information when a new player is filling out the Bingo Player Card Application. If the bingo hall workers are unsuccessful at obtaining this information during the initial contact, a letter and pre-addressed return envelope will be sent to the bingo player within 30 days per the FEC requirement.

As we have done over the last 3 years, we will continue our best efforts to obtain full required contributor information; track every dollar in and every dollar out; regularly inform bingo players and bingo hall workers of the FEC requirements; and do everything we can to be transparent and meet the requirements of Federal law and the requests of our FEC analyst.

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MISCELLANEOUS TEXT (FEC Form 99)

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NAME OF COMMITTEE (In Full)
Oakland County Democratic Party

FEC IDENTIFICATION NUMBER
C00040857

Mailing Address 17100 W. 12 Mile Rd.
Suite 5

City	State	ZIP Code
Southfield	MI	48076

Best Efforts Statement
2017-2018

In our efforts to provide adequate monthly reports to the FEC and establish best efforts, we have taken and will continue to take the following actions for the 2017-2018 election cycle:

1. All new bingo players are **REQUIRED** to provide address and employer/occupation information on a revised Bingo Player Card Application before they are given a bingo player card. The application includes the FEC recommended statement ?

****Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions exceed \$200 in a calendar year.**

If a new bingo player refuses to provide the required information, they will be denied the opportunity to play bingo.

2. Signs are posted in the bingo hall that include the FEC recommended statement ?

****Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions exceed \$200 in a calendar year.**

3. Letters and pre-addressed return envelopes have been sent to all bingo players that have not provided employer/occupation information and to those that have ?Information Requested/Information Requested?, ?Info Requested/Info Requested?, ?N/A/N/A?, ?None/None?, or any other derivatives or misspellings of these words. These letters only ask for the missing employer/occupation information and are NOT letters soliciting additional contributions. We have received little response to these letters but we will continue to send them monthly (to meet the 30 day FEC requirement) to those individuals that have not provided the missing information. Since some bingo players come intermittently and since our previous FEC analyst accepted our reports as filed, it may take some time to update everyone in our system but we will make every effort to do so.

For the 2017-2018 election cycle, OCDP will send letters with pre-addressed return envelopes to bingo players missing employer/occupation information. Those letters will only ask for the missing employer/occupation information and will NOT solicit additional contributions.

We used ?Bingo Player/Bingo Player? for Employer/Occupation for almost 2 years before our previous analyst informed us that it was unacceptable. We have made every effort to provide updated information for those formerly classified as ?Bingo Player/Bingo Player?.

4. As was done during the 2015-16 cycle, bingo hall workers have been and will continue to be given a list of those bingo players that are missing required FEC information and the bingo hall workers directly ask for the missing information if the players return to the hall. The bingo hall workers do NOT solicit additional contributions, they merely ask for the missing information as is required by the FEC.

We will continue to have the bingo hall workers do this monthly (to meet the 30 day FEC requirement).

5. At the request of our new FEC analyst, we will no longer use abbreviations, even though that is the information that has been provided directly by the bingo players on the former voucher forms ? i.e. CSR for Customer Service Representative; DMC for Detroit Medical Center; DPS for Detroit Public Schools; DCW for Direct Care Worker; GM for

MISCELLANEOUS TEXT (FEC Form 99)

NAME OF COMMITTEE (In Full)
Oakland County Democratic Party

FEC IDENTIFICATION NUMBER
C00040857

Mailing Address **17100 W. 12 Mile Rd.**
Suite 5

City **Southfield** State **MI** ZIP Code **48076**

General Motors. Bingo hall workers have been advised that abbreviations are unacceptable and that they are required to inform bingo players of the same. We have made every effort to update this information in NGP.

6. At the request of our new FEC analyst, we will now ask self-employed individuals to provide their occupation rather than just stating that they are self-employed. Bingo hall workers have been advised that an occupation is required for self-employed individuals and they will do their best to obtain that information when a new player is filling out the Bingo Player Card Application. If the bingo hall workers are unsuccessful at obtaining this information during the initial contact, a letter and pre-addressed return envelope will be sent to the bingo player within 30 days per the FEC requirement.

7. For the 2017-2018 election cycle we will amend monthly reports if/when updated employer/occupation information is received for those previously missing this information.

As we have done over the last 3 years, we will continue our best efforts to obtain full required contributor information; track every dollar in and every dollar out; regularly inform bingo players and bingo hall workers of the FEC requirements; and do everything we can to be transparent and meet the requirements of Federal law and the requests of our FEC analyst.

**GREEN ACRES BINGO HALL
BINGO PLAYER CARD APPLICATION**

PLEASE PRINT – ALL INFORMATION IS REQUIRED**

First Name: _____ **Last Name:** _____

Street Address: _____

City: _____ **State:** _____ **Zip:** _____

Employer: _____ **Occupation:** _____

Card Number Assigned: _____ **Date Card Assigned:** _____

Player Signature: _____

Staff/Volunteer Approval: _____

****Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions exceed \$200 in a calendar year.**

- All of the information on the Bingo Player Card Application is required.
- NO abbreviations of Employer or Occupation can be accepted.
- N/A; None; Not Applicable are not acceptable. Must use Unemployed or Retired.
- Self-Employed individuals must indicate what business they are in.

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17. 2015 February Monthly Report: Schedule B supporting Line 21 (b) disclosed thirty four (34) payments to "Non-Voucher Prize Winners" for the purpose of "Non Voucher Prize Payouts" but failed to itemize the individuals who received payment totaling \$73,353.30.

18. 2015 March Monthly Report: Schedule B supporting Line 21 (b) disclosed forty (40) payments to "Non Voucher Prize Winners" for the purpose of "Non-Voucher Prize Payouts" but failed to itemize the individuals who received payment totaling \$95,831.80.

19. 2015 April Monthly Report: Schedule B supporting Line 21 (b) disclosed twenty-seven (27) payments to "Non-Voucher Prize Winners" for the purpose of "Non-Voucher Prize Payouts" but failed to itemize the individuals who received payment totaling \$66,786.40.

20. 2015 May Monthly Report: Schedule B supporting Line 21 (b) disclosed twenty-five (25) payments to "Non-Voucher Prize Winners" for the purpose of "Non Voucher Prize Payouts" but failed to itemize the individuals who received payment totaling \$64,830.40.

Included are the following documents:

RFAI dated 9-27-15 Amended February 2015 Monthly
Form 99 Response dated 11-2-15 #3

RFAI dated 9 30 15 Amended March 2015 Monthly
Form 99 Response dated 11-4 15 #3

RFAI dated 9-30-15 Amended April 2015 Monthly
Form 99 Response dated 11 2 15 #3

RFAI dated 10 5 15 Amended May 2015 Monthly
Form 99 Response dated 11-9 15 #3

Form 99 dated 1 12 16

OFFICE OF GENERAL
REGISTRATION

2015 FEB - 6 PM 3:54

RECEIVED
REGISTRATION
SECTION
11-10-15

This is another issue that has been addressed by the implementation of our POS system in September of 2015.

Per the Form 99 Report submitted 11-9-15:

"The changes in interpretation of what we were required to do per CFR 11 for the "Non-Voucher Prize Winners" has recently been updated after a recently completed audit by the FEC (approved in the summer of 2015 by the Commission.) We have fully complied and cooperated with all requests and findings of the Commission and have invested considerable resources to change our entire record-keeping system to an electronic Point-of-Sale and Player ID card tracking system that should enable detailed reports moving forward."

OAKLAND COUNTY DEMOCRATIC PARTY

Page 2 of 3

description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

3. Schedule B of your report discloses disbursements to "Non-Voucher Prize Winners" for "Non Voucher Prize Payouts"; however, you have not itemized the individuals who received payment. For each individual or vendor paid in excess of \$200 in a calendar year, a memo entry including the name and address of the individual receiving the prize, as well as the date, amount, amend purpose of the original disbursement must be provided. Please amend your report to include the missing information or provide clarifying information if memo entries are not required. (11 CFR § 104.9)

OAKLAND COUNTY DEMOCRATIC PARTY

Page 3 of 3

4. Your report does not include a Schedule H1 to disclose the ratio for the allocation of certain costs. For State, District and Local party committees, Schedule H1 must be filed in the first report each calendar year that discloses an allocable disbursement. Further, all shared administrative, generic voter drive and exempt activity costs incurred during the two-year cycle must be allocated according to the appropriate fixed ratio, unless the federal account elects to pay a higher percentage of its cost. (11 CFR §§106.7(d)(2) and (3))

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 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) 694-1393.

Sincerely,



Paul Stoetzer
Senior Campaign Finance Analyst
Reports Analysis Division

320

MISCELLANEOUS TEXT (FEC Form 99)

Response to RAI for FEC-1015850 Amendment

This message is in response to the RAI for our amended February 2015 report covering January 2015.

1. Our amended report shows an increase in disbursements over our original report due to bingo disbursements that did not properly transfer from QuickBooks to NGP. Our amendment properly reported the disbursements. This issue was addressed in our Form 99 filed on September 28, 2015.
2. The Oakland County Democratic Party has attempted "best efforts" to solicit the requested information for all donors mandated by "11 CFR." Past attempts to gather this information include: 1) Direct asks by volunteers and paid staff to said donors; 2) Mailings; and 3) Follow up phone calls. It is also worth noting that the vast majority of the individuals who we listed as "Bingo Player" have no other source of income (either being retired or a homemaker) which lead to some of the confusion from these individuals as to whom they should list and how we should track employer information. We are currently increasing our efforts now to rectify this for all donors including: 1) Re-educating our volunteers and staff at the Bingo Hall to ensure they are properly assisting us in collecting information through face-to-face efforts requiring individuals to complete a form; 2) Additional monthly mailings to these individuals; 3) Phone calls by volunteers and/or staff.
3. The changes in interpretation of what we were required to do per CFR 11 for the "Non-Voucher Prize Winners" has recently been updated after a recently completed audit by the FEC (approved in the summer of 2015 by the Commission). We have fully complied and cooperated with all requests and findings of the Commission and have invested considerable resources to change our entire record-keeping system to an electronic Point-of-Sale and Player ID Card tracking system that should enable detailed reports moving forward.
4. Our H1 was filed on 3-19-15 with our March 2015 report for February 2015 when we were made aware that it had not been filed in February. This was also addressed in our Form 99 filed on September 28, 2015.

11/02/2015 15:47



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 30, 2015

PHILLIP W. REID, TREASURER
OAKLAND COUNTY DEMOCRATIC PARTY
24445 NORTHWESTERN HWY, SUITE 110
SOUTHFIELD, MI 48075

Response Due Date

11/04/2015

IDENTIFICATION NUMBER: C00040857

REFERENCE: AMENDED MARCH MONTHLY REPORT (02/01/2015 - 02/28/2015),
RECEIVED 07/16/2015

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 5 item(s):

1. Your amended report discloses an increase in disbursements totaling \$355,689.84 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)
2. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer name and occupation entries appear on your report and are not considered acceptable: "Bingo Player / Bingo Player," "Bingo Player / This individual is a Bingo participant," "Information Requested / Information Requested," "Bingo Player / Information Requested," "Information Requested / Student," and "Bingo Player / Binglo Player."

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information.

OAKLAND COUNTY DEMOCRATIC PARTY

Page 2 of 4

To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

3. Schedule B of your report discloses disbursements to "Non-Voucher Prize Winners" for "Non Voucher Prize Payouts"; however, you have not itemized the individuals who received payment. For each individual or vendor paid in excess of \$200 in a calendar year, a memo entry including the name and address of the individual receiving the prize, as well as the date, amount, amend purpose of the original disbursement must be provided. Please amend your report to include the missing information or provide clarifying information if memo entries are not required. (11 CFR § 104.9)

OAKLAND COUNTY DEMOCRATIC PARTY

Page 3 of 4

4. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "Quick Shot." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf.

5. On Schedule H1 of your report, you have checked an incorrect fixed percentage for your allocated federal and non-federal administrative, generic voter drive and exempt activity costs. The fixed percentage for these costs is based on whether a Presidential and/or a Senate candidate appear on the State's ballot. Please amend your report to include a corrected Schedule H1 and note that a change in this ratio may make it necessary to repay your non-federal account for any overpayments that may have been made. While the Commission may take further legal action concerning any impermissible overpayments by the non-federal account, your prompt action will be taken into consideration. (11 CFR §106.7(d)(2) and (3))

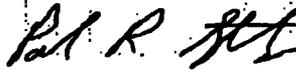
Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions 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) 694-1393.

OAKLAND COUNTY DEMOCRATIC PARTY

Page 4 of 4

Sincerely,



Paul Stoetzer
Senior Campaign Finance Analyst
Reports Analysis Division

320

11024441100001



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 30, 2015

PHILLIP W. REID, TREASURER
OAKLAND COUNTY DEMOCRATIC PARTY
24445 NORTHWESTERN HWY, SUITE 110
SOUTHFIELD, MI 48075

Response Due Date

IDENTIFICATION NUMBER: C00040857

11/04/2015

REFERENCE: AMENDED APRIL MONTHLY REPORT (03/01/2015 - 03/31/2015),
RECEIVED 07/16/2015

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 4 item(s):

1. Your amended report discloses an increase in disbursements totaling \$225,355.59 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)
2. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer name and occupation entries appear on your report and are not considered acceptable: "Bingo Player / Bingo Player," "Information Requested / Information Requested," "Bingo Player / This individual is a Bingo participant," "Bingo Player / Information Requested," and "Bingo Player / Bingle Player."

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information.

OAKLAND COUNTY DEMOCRATIC PARTY

Page 2 of 3

To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

3. Schedule B of your report discloses disbursements to "Non-Voucher Prize Winners" for "Non Voucher Prize Payouts"; however, you have not itemized the individuals who received payment. For each individual or vendor paid in excess of \$200 in a calendar year, a memo entry including the name and address of the individual receiving the prize, as well as the date, amount, amend purpose of the original disbursement must be provided. Please amend your report to include the missing information or provide clarifying information if memo entries are not required. (11 CFR § 104.9)

OAKLAND COUNTY DEMOCRATIC PARTY

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4. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "Quick Shot." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf.

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 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) 694-1393.

Sincerely,



Paul Stoetzer
Senior Campaign Finance Analyst
Reports Analysis Division

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

October 5, 2015

PHILLIP W. REID, TREASURER
OAKLAND COUNTY DEMOCRATIC PARTY
24445 NORTHWESTERN HWY, SUITE 110
SOUTHFIELD, MI 48075

Response Due Date

11/09/2015

IDENTIFICATION NUMBER: C00040857

REFERENCE: AMENDED MAY MONTHLY REPORT (04/01/2015 - 04/30/2015),
RECEIVED 09/08/2015

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 4 item(s):

1. Your amended report discloses an increase in disbursements totaling \$35,689.23 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)

2. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer name and occupation entries appear on your report and are not considered acceptable: "Bingo Player / Bingo Player," "Information Requested / Information Requested," "Bingo Player / Information Requested," "Information Requested / This individual is a Bingo participant," "Bingo Player / Bingo Player."

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information.

OAKLAND COUNTY DEMOCRATIC PARTY

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To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

3. Schedule B of your report discloses disbursements to "Non-Voucher Prize Winners" for "Non Voucher Prize Payouts"; however, you have not itemized the individuals who received payment. For each individual or vendor paid in excess of \$200 in a calendar year, a memo entry including the name and address of the individual receiving the prize, as well as the date, amount, amend purpose of the original disbursement must be provided. Please amend your report to include the missing information or provide clarifying information if memo entries are not required. (11 CFR § 104.9)

OAKLAND COUNTY DEMOCRATIC PARTY

Page 3 of 3

4. On Schedule B supporting Line 21(b) of the Detailed Summary Page, your committee discloses disbursements for "Progressive Jackpot Winner" and lists itself "Oakland County Democratic Party" as the payee. Please clarify the nature of this transaction or amend Schedule B by providing the correct name and mailing address of the payee.

If this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

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 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) 694-1393.

Sincerely,



Paul Stotzer
Senior Campaign Finance Analyst
Reports Analysis Division

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MISCELLANEOUS TEXT (FEC Form 99)

This message is in response to the RFAI for our amended May 2015 report covering April 2015. Filing an amended report would not provide any of the requested additional information per our responses below.

1. Our amended report shows an increase in disbursements over our original report due to bingo disbursements that did not properly transfer from QuickBooks to NGP on our February 2015 report. The amending of the February report necessitated the filing of amended reports for all following months. Our amendment properly reported the disbursements.

2. The Oakland County Democratic Party has attempted ""best efforts"" to solicit the requested information for all donors mandated by ""11 CFR."" Past attempts to gather this information include: 1) Direct asks by volunteers and paid staff to said donors; 2) Mailings; and 3) Follow up phone calls. It is also worth noting that the vast majority of the individuals who we listed as ""Bingo Player"" have no other source of income (either being retired or a homemaker) which lead to some of the confusion from these individuals as to whom they should list and how we should track employer information. We are currently increasing our efforts now to rectify this for all donors including: 1) Re-educating our volunteers and staff at the Bingo Hall to ensure they are properly assisting us in collecting information through face-to-face efforts requiring individuals to complete a form; 2) Additional monthly mailings to these individuals; 3) Phone calls by volunteers and/or staff.

3. The changes in interpretation of what we were required to do per CFR 11 for the ""Non-Voucher Prize Winners"" has recently been updated after a recently completed audit by the FEC (approved in the summer of 2015 by the Commission). We have fully complied and cooperated with all requests and findings of the Commission and have invested considerable resources to change our entire record-keeping system to an electronic Point-of-Sale and Player ID Card tracking system that should enable detailed reports moving forward.

4. (regarding the ""Progressive Jackpot"" Disbursements), these disbursements are for a joint Progressive Bingo jackpot that is between typically several different bingos through our Bingo Hall that our Bingo licenses buy into through 1) A standard startup fee - every time the Progressive goes we pay again for the next jackpot seed money; and 2) We deposit all money into our ""Federal"" Bingo account first - as required by State of Michigan gaming authorities - and then are transferring the future ""winnings"" for the Progressive Jackpot winner into a non-Federal, administrative account that is currently run by the Oakland County Democratic Party for the Hall (for no costs). For years this was administered by the Hall for free to Bingos licenses but they opted out of this responsibility moving forward so the the Oakland County Democratic Party created a non-Federal Bingo admin account for the Hall's Joint ""Progressive"" for all of to put money into and pay out of.

Keep in mind all records for the Progressive Jackpot account are reported to the Michigan Gaming Board and copies of statements, checks and other records are required to be kept at the hall and are reviewed regularly by state gaming regulators. This is a non-Federal activity ran by the Hall that we simply keep an additional bank account for under our DBA (Doing Business As).

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Oakland County Democratic Party
FEC ID #C00040857

Past FEC Correspondence

Attached are letters written in 2016 to the FEC that provide historical context to some of the issues presented in

POSTMASTER: RETURN TO POST OFFICE BOX 10000, WASHINGTON, DC 20090

OFFICE OF GENERAL
COUNSEL

2017 DEC - 6 PM 3: 54

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Re: RR 16L-02

Dear Mr. Jordan,

This is the response of Philip W. Reid, Treasurer, and the Oakland County Democratic Party to your letter dated January 28, 2016 concerning the above matter. We urge that no action be taken for these reasons.

1. Why the February, March and April, 2015 Reports Were Amended.

This was a period of significant change for the ODCP in its operations.

First, beginning in September, 2014 ODCP acquired four (4) new bingo fundraising licenses from the State of Michigan, increasing the number of ODCP weekly bingo's from two (2) to six (6). This significantly increased the sums required to be reported.

Second, beginning in February 2015, ODCP transitioned from a reporting procedure where the Treasurer prepared and filed FEC reports and the Bookkeeper entered transactional data into Quickbooks to a new process where the Bookkeeper processed Quickbooks data directly into FEC reports using NGP.

Third, the ODCP Treasurer had been informed by the FEC Reports Analyst that there were serious problems with reports that had been filed by the Committee in 2014. ODCP determined that it needed to go back to the beginning of 2013 to resolve known report issues. This period of FEC reports spanned two previous Treasurers and two previous Bookkeepers. Future reports would inherit the problems created in previous reports.

In the course of all these operational changes and massive correction of previous reports, the inadvertent underreporting of the disbursements at issue took place. When it was discovered, it was promptly corrected.

2. The Failure to Report and Subsequent Amendments Had No Affect on Federal Election Activity.

The disbursements in question had no affect on federal election activity in 2015 for several reasons. First, the bulk of the disbursements was the prize money paid to individual players at our bingo games. Second, there were no federal elections during this period so the balance of the disbursements paid for ODCP administrative costs such as an office. Thus, the public was not deprived of being able to consider the impact of these disbursements on federal elections.

3. These Reporting Errors Will Not Occur Again.

The problems in transferring data from Quickbooks to NGP have been resolved and will not occur again. OCDP has reviewed all of its recordkeeping and reporting practices to ensure that this inadvertent error will not reoccur.

Conclusion.

These errors were the inadvertent product of massive changes in OCDP operations. There was no intentional underreporting and when the underreporting was discovered it was promptly corrected. Moreover, the initially unreported disbursements at issue had no impact whatsoever on federal election activity and therefore did not harm the public. Finally, changes have been made to ensure that these errors will not reoccur.

For these reasons, OCDP requests that no action be taken in this matter.

Oakland County Democratic Party
FEC ID #C00040857

21. 2015 Amended March Monthly Report: Schedule H1 failed to disclose the correct ratio for the allocated Federal and Non-Federal activity.

We believed that this issue had been addressed. We were unaware that the correct percentage was 28%, not the 15% we filed on our H1 form. However, there were no Federal to Non-Federal transfers made for administrative costs in 2015 so there was no financial impact. The percentage was corrected in 2016 and the proper adjustments were made.

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2017 DEC - 6 PM 3:54

OFFICE OF GENERAL
COUNSEL

100040857

SCHEDULE H1 (FEC Form 3X)

METHOD OF ALLOCATION FOR:

- **ALLOCATED FEDERAL AND NONFEDERAL ADMINISTRATIVE, GENERIC VOTER DRIVE AND EXEMPT ACTIVITY COSTS**
- **ALLOCATED FEDERAL AND LEVIN FUNDS FEDERAL ELECTION ACTIVITY EXPENSES (State, District and Local Party Committees Only)**
- **ALLOCATED PUBLIC COMMUNICATIONS THAT REFER TO ANY POLITICAL PARTY (BUT NOT A CANDIDATE) (Separate Segregated Funds And Nonconnected Committees Only)**

NAME OF COMMITTEE (In Full)
 Oakland County Democratic Party

Transaction ID : M49

USE ONLY ONE SECTION, A or B

A. State and Local Party Committees

Fixed Percentage (select one)

- Presidential-Only Election Year (28% Federal)
- Presidential and Senate Election Year (36% Federal)
- Senate-Only Election Year (21% Federal)
- Non-Presidential and Non-Senate Election Year (15% Federal)

B. Separate Segregated Funds and Nonconnected Committees

Flat Minimum Federal Percentage

If the committee will allocate using the flat minimum percentage of 50% federal funds, check **or**

If the committee is spending more than 50% federal funds, indicate ratio below

Federal..... %
 Nonfederal..... %

This ratio applies to (check all that apply):

Administrative Generic Voter Drive Public Communications Referencing Party Only