



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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March 4, 2008

Gary J. Kucinich, Treasurer  
Kucinich for President 2008  
550 East Walnut Street  
Columbus, OH 43215

Response Due Date:  
April 3, 2008

Identification Number: C00430975

Reference: Year End Report (10/1/07 - 12/31/07)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in enforcement action.** Additional information is needed for the following 8 items:

1. Your report contains incorrect Column B figures for Lines 17(a), 17(e), 22, 23, and 30 of the Summary and Detailed Summary Page information. When aggregating and reporting receipts and disbursements, candidate committees are required to disclose their activity on an election-cycle basis, from 11/3/04 to 11/4/08. Please amend your report to show election cycle-to-date figures for all aggregate amounts. (2 U.S.C. § 434(b))
2. Commission Regulations require that a committee disclose 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.

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.

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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 follow-up requests for contributor information:

- 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))
- were not documented clearly in the form of written records/electronic files.
- 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))

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 for Congressional Committees and Candidates.

3. Your report fails to provide election designations for some of the contributions disclosed on Schedule(s) A-P for Line(s) 17(a). Authorized committees should indicate the election for which the contribution was designated. If no election is designated, the contribution is applied to the next election for the federal office the candidate is seeking after the contribution date. Please amend your report to provide election designations. (11 CFR §§ 110.1(b)(2) and 110.2(b)(2))

4. On Schedule B-P of your report, you have itemized disbursements for which you have failed to include the address. Please amend your report to include the missing information. (11 CFR § 104.3(b)(4))

5. Commission Regulations define the term "purpose" to mean a brief statement or description of why a disbursement was made. Examples are "dinner expense," "media," "salary," "polling," "travel," "party fees," "phone banks," "travel expenses," "travel expense reimbursement," and "catering costs." Examples of election day and voter registration activity include "exit polling," "door-to-door get out the vote," "get out the vote phone calls," and "driving voters to the polls." Unacceptable descriptions, which require additional clarification, include but are not limited to "advance," "consulting," "political consulting," "commission," "contract

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labor," "retainer," "election day expense," "expenses," "invoice," "support," "expense reimbursement," "miscellaneous," "professional services," "get-out-the-vote," "voter registration," "requested," and "event expense." (11 CFR § 104.3(b)(4)(A))

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 amend Schedule B-P of your report to correct the descriptions that do not meet the requirements of the Regulations.

6. Schedule B-P of your report discloses a disbursement to American Express on 11/8/07 for \$18,809.07 on Line 23, Schedule B-P. When reporting payments to credit card companies, if the payment to the original vendor aggregates in excess of \$200 in an election cycle, you must itemize, as a memo entry, the name and address of the original vendor, together with the date, amount and purpose of the expenditure. If itemization is not necessary, you must indicate so in an amendment to this report. Please correct your report to include the missing information. (11 CFR § 104.9(a) & (b))

7. Schedule B-P of your report discloses reimbursements to individuals for transactions other than travel, meals and lodging. Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in an election cycle, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. If itemization is not necessary, you must indicate so in an amendment to this report. Please correct your report to include the missing information. (11 CFR § 104.9(a) & (b))

8. Schedule B-P of your report discloses reimbursements to staff for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by staff to any one vendor that make up the reimbursement may have to be itemized. For example, if the campaign related payments to any one vendor by the campaign/staff aggregate in excess of \$200 for the election cycle, the staff advance payment to the vendor must also be itemized in a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and detailed purpose of the advance. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must indicate so in an

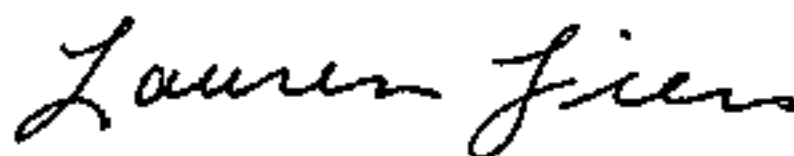
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amendment to this report. Please amend your report to include the missing or clarifying information. See AO 1996-20 for additional clarification. (11 CFR § 104.9)

**Please note you will not receive an additional notice from the Commission on this matter.** Adequate responses received on or before this date will be taken into consideration. **Requests for extensions of time in which to respond will not be considered.** Failure to comply with the provisions of the Act may 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.

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) 694-1169.

Sincerely,



Lauren Lien  
Senior Campaign Finance Analyst  
Reports Analysis Division

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