



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Charles A. Gueli, Treasurer
Italian American Democratic
Leadership Council
1828 L Street NW
Suite 1010
Washington, DC 20036

JAN 25 1995

Identification Number: C00299396

Reference: 30 Day Post-General Report (10/1/94-11/28/94)

Dear Mr. Gueli:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Political committees which have cash on hand at the time of registration must disclose the source of the funds. The balance is assumed to be composed of those contributions most recently received by the committee prior to registration. Please identify the source of these contributions on a memo Schedule A. 11 CFR §104.12

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§442a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original

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report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). The Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a 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 prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from

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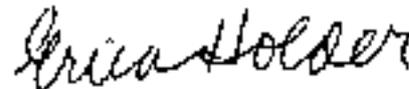
ITALIAN AMERICAN DEMOCRATIC LEADERSHIP COUNCIL
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Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Schedule B, supporting Line 23, discloses an in-kind contribution to American Vitners Association that lacks the amount of the contribution. Please amend your report to include this information.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Erica Holder
Reports Analyst
Reports Analysis Division

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SCHEDULE B ITEMIZED DISBURSEMENTS
(Contributions to Federal Candidates)

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)
Italian American Democratic Leadership Council

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Mascara for Congress PO Box 1109 Washington, PA 15301	Contribution to Frank Mascara House Candidate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/3/94 10/24/94	\$500.00 \$500.00
Didonato for Congress P.O. Box 30 New Philadelphia, OH 44663	Contribution to Greg Didonato House Candidate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/3/94 10/24/94	\$500.00 \$500.00
Dalacci for Congress 81 Main Street Bangor, Maine 04401	Contribution to John Dalacci House Candidate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/3/94 10/24/94	\$500.00 \$500.00
Magazau for Congress P.O. Box 87 Vine Land, NJ 08360	Contribution to Lou Magazau House Candidate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/3/94 10/24/94	\$500.00 \$500.00
Giglio for Congress 523 Burnham Avenue Calumet City, IL 60409	Contribution to Frank Giglio House Candidate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/3/94 10/24/94	\$500.00 \$500.00
Schilliro for Congress 393 Sunrise Highway Lynbrook, NY 11563	Contribution to Philip Schilliro House Candidate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/3/94 10/24/94	\$500.00 \$500.00
Pensari for Congress 16 Windward Court Aurora, IL 60506	Contribution to Peter Pensari House Candidate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/1/94	\$500.00
Barca for Congress 512 56th Street Kenosha, WI 53140	Contribution to Peter Barca House Candidate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/1/94	\$3500.00
Lukocco for Congress PO Box 1553 Boise, ID 83701	Contribution to Larry Lukocco House Candidate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/1/94	\$2500.00

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SUBTOTAL of Disbursements This Page (optional) 12,500.00

TOTAL This Period (see page this line number only)

SCHEDULE A

**ITEMIZED RECEIPTS
(Other Political Committees)**

Use separate schedule(s)
for each category of the
Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 11(C)

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)

Italian American Democratic Leadership Council

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A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
IADLC - Delaware Committee 1828 L Street NW Suite 1010 Washington DC 20036 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		10/21/94	\$ 2726.08 Aggregate Year-to-Date > \$ 2726.08
Laborers Political League 905 16th Street NW Washington DC 20006 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		11/3/94	\$ 1000.00 Aggregate Year-to-Date > \$ 1000.00
Great Western Financial Corp Good Government Committee 9700 Caldale Ave, Chatsworth CA 91311 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		11/3/94	\$ 1000.00 Aggregate Year-to-Date > \$ 1000.00
IADLC/Banca Laborers Dem Act 1828 L Street NW Suite 1010 Washington DC 20036 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		11/3/94	\$ 4375.00 Aggregate Year-to-Date > \$ 4375.00
Services Employees International Union 1313 L Street NW Washington D.C. 20005 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		11/3/94	\$ 5000.00 Aggregate Year-to-Date > \$ 5000.00
F. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			Aggregate Year-to-Date > \$
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			Aggregate Year-to-Date > \$

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

\$ 14,101.08

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