



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

William D. Harris, Treasurer
Alliance for the West
818 Connecticut Avenue, Suite 1100
Washington, DC 20006

Identification Number: C00335133

NOV 8 2000

Reference: April Quarterly Report (1/01/00-3/31/00)

Dear Mr. Harris:

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:

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have not included the full name and/or mailing address for the vendor(s) listed. Please amend your report accordingly.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the purpose for the joint expenditure to Bank Service Charge. Note that the unique identifying code for an event is not considered an adequate description of purpose. Please amend your report to include this missing information.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the total EVENT YEAR-TO-DATE amount for a payment(s) to Mark Shonce, Lukens Cook Co., Townsend Group, Office Catering, Sullivan & Mitchell, Bank Service Charge and Oldaker & Harris, LLP. Please amend your report to include the missing EVENT YEAR-TO-DATE total(s).

-Schedule H4 of your report discloses a disbursement to the Townsend Group that is categorized as administrative and fundraising. For the Public Record, please clarify whether this event did in fact encompass more than one type of activity. All payments for fundraising must include both a

unique identifying code and the purpose of the disbursement. If the activity or event should have been categorized differently, please amend your report accordingly.

-Schedule H4 discloses a disbursement(s) which is categorized as a fundraising expense(s); however the Schedule H2 that has been filed does not disclose any fundraising activities or events. All committees are required to allocate the direct costs of each fundraising event in which the committee collects both federal and non-federal funds. The costs are allocated according to the funds received ratio and reported on Schedule H2. 11 CFR §§106.5(f) and 106.6(d). Please file a Schedule H2 to disclose the ratio for the fundraising event(s).

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to check the appropriate CATEGORY box for the payment(s) made to Lukens Cook Co. and Office Catering. Please amend your report to disclose the appropriate category.

-On Schedule H3 supporting Line 18 of the Detailed Summary Page, Lines i), ii)e), and iii)e) for the transfer-in from the Non-Federal Account do not add up to the March 1, 2000 \$10,000 transfer-in. Please amend your report to correct this discrepancy. 11 CFR §104.10

-Schedules H2 and H4 disclose 100% federal and non-federal activity. Please be advised that by definition, this activity does not qualify as a shared expense to be allocated between your federal and non-federal accounts. This activity should be itemized on a Schedule B for Line 21(b) of the Detailed Summary Page. Any reimbursement from your committee's non-federal account for any portion of this activity is not permissible and must be returned. Please amend your report to clarify this discrepancy.

-Please provide the coverage dates of your report on Line 5 of the Summary Page.

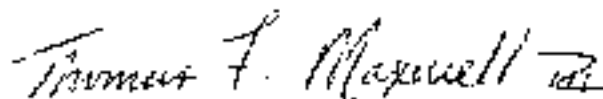
-The Detailed Summary Page, on Line 18 Column A of your report, discloses \$10,000 in transfers from the non-federal account for joint activity for the reporting period. However, Line 21 (a)(ii) Column A discloses \$5,995.38 as the non-federal share for joint activity for the reporting period. While the non-federal account is permitted to transfer funds to the federal account for shared activity, transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after

the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of the transfers-in from the non-federal account.

The Commission recommends that you immediately transfer back to the non-federal account, the total excessive amount which was received by your federal account outside the 70-day time period. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

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 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Thomas F. Maxwell, III
Reports Analyst
Reports Analysis Division

