



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

JAN 29 1997

Mary Maloney, Treasurer
Iowa Democratic Party (Federal Division)
431 East Locust
Des Moines, IA 50309

Identification Number: C00035600

Reference: 30 Day Post-General Report (10/17/96-11/25/96)

Dear Ms. Maloney:

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:

-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. §§441a(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 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). In order to protect the donor's interests, 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.

-The limitation on making coordinated expenditures on behalf of a candidate for the 1996 general election is \$130,873. Your reports, however, disclose coordinated expenditures made on behalf of Tom Harkin totalling \$137,680, which appear to exceed the limitations under 2 U.S.C. §441a(d) (pertinent portions attached).

If the expenditures in question were incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive coordinated expenditure, you should notify the candidate and request a refund of the amount in excess of the limitation.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the candidate. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

Although the Commission may take further legal action concerning the excessive coordinated expenditures, prompt action in obtaining a refund will be taken into consideration.

-Schedule A supporting Line 12 discloses a transfer-in from the Democratic Congressional Campaign Committee, the Democratic National Committee and the Democratic Senatorial Campaign Committee. Schedule B supporting Line 21(b) reflects payments for exempt activity. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used including distribution by direct mail; all funds used for the activity must be permitted under the Act; none of the funds used

may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR §§100.7(b)(15) and (17) and Pages 14 and 15 of the Campaign Guide for Party Committees.

Please clarify the nature of the transfers-in and subsequent payments for the exempt activity. If the activity disclosed on your report does not meet the definition of "exempt" activity as described above and if any portion of the expenditures were made on behalf of specifically identified candidates, that amount must be disclosed on Schedule B or F supporting Line 23 or 25 of the Detailed Summary Page as appropriate.

-Line 21(a)(ii) of the Detailed Summary Page of your report discloses a total of \$562,621.66 in the non-federal share of allocable activity. The sum of the entries itemized on Schedule H4, however, indicates the total to be \$548,806.01. Please amend your report to clarify the discrepancy.

-Line 21(a)(i) of the Detailed Summary Page of your report discloses a total of \$426,433.11 in the federal share of allocable activity. The sum of the entries itemized on Schedule H4, however, indicates the total to be \$440,251.79. Please amend your report to clarify the discrepancy.

-Your EVENT YEAR-TO-DATE calculations for each exempt activity are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct exempt activity EVENT YEAR-TO-DATE totals.

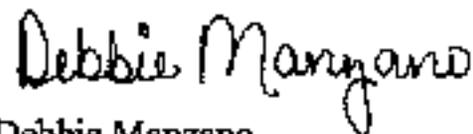
-On Schedule H2, you have failed to check the ratio type box (i.e., NEW, REVISED, SAME AS PREVIOUSLY REPORTED). Please amend your report to correct this omission. 11 CFR §104.10(a)(1)

-Your report disclosed certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. Transfers to affiliated committees and contributions to federal candidates should be

properly disclosed on a separate Schedule B, supporting Lines 22 and 23 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

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,



Debbie Manzano
Senior Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 3 OF 3
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 purpose, other than using name and address of a political committee to solicit from contributions from such committee.

NAME OF COMMITTEE (In Full)

Iowa Democratic Party (Federal Division)

A	Full Name, Mailing Address, & Zip Code First District Democratic Central Committee 608 Meadowview Dr Clinton, IA 52732	Name of Employer Occupation	Date (month, day, year) 10/29/98	Amount of Each Receipt This Period 2,100.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other(specify):		Aggregate Year-to-Date \$3100.00		
B	Full Name, Mailing Address, & Zip Code MEBA PAC 444 N. Capitol St. #600 Washington, DC 20001	Name of Employer Occupation	Date (month, day, year) 10/29/96	Amount of Each Receipt This Period 6,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other(specify):		Aggregate Year-to-Date \$5000.00		
C	Full Name, Mailing Address, & Zip Code Letter Carriers PAC 100 Indiana Ave. NW Washington, DC 20001	Name of Employer Occupation	Date (month, day, year) 10/29/96	Amount of Each Receipt This Period 5,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other(specify):		Aggregate Year-to-Date \$5000.00		
D	Full Name, Mailing Address, & Zip Code Meakwaki 1504 305th St Tama, IA 52339	Name of Employer Occupation	Date (month, day, year) 10/29/96	Amount of Each Receipt This Period 5,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other(specify):		Aggregate Year-to-Date \$5000.00		
E	Full Name, Mailing Address, & Zip Code Cabazon Band of Mission Indians 84-245 Indio Springs Dr Indio, CA 92201	Name of Employer Occupation	Date (month, day, year) 10/29/96	Amount of Each Receipt This Period 4,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other(specify):		Aggregate Year-to-Date \$4000.00		
F	Full Name, Mailing Address, & Zip Code United Mine Workers PAC 900 15th St. NW Washington, DC 20005	Name of Employer Occupation	Date (month, day, year) 11/04/96	Amount of Each Receipt This Period 1,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other(specify):		Aggregate Year-to-Date \$1000.00		
G	Full Name, Mailing Address, & Zip Code KidsPac, Inc. 80 Trowbridge St Cambridge, MA 02138	Name of Employer Occupation	Date (month, day, year) 11/04/98	Amount of Each Receipt This Period 5,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other(specify):		Aggregate Year-to-Date \$5000.00		
SUBTOTAL of Receipts This Page				\$27,100.00
TOTAL This Period				

SCHEDULE A

ITEMIZED RECEIPTS

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

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NAME OF COMMITTEE (in Full)
Iowa Democratic Party (Federal Division)

Full Name, Mailing Address, & Zip Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
A Tom Daehle 1992 PO Box 1656 Sioux Falls, SD 57101	Occupation	11/06/96	5,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other(specify):		Aggregate Year-to-Date \$5000.00	
C National Motor Club of America 2711 Cedar Springs Dallas, TX 75201	Occupation	11/18/96	176.12
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other(specify):		Aggregate Year-to-Date \$176.12	
C Laborers Political League PAC 955 16th St., N.W. Washington, DC 20005	Occupation	11/19/96	300.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other(specify):		Aggregate Year-to-Date \$1600.00	
Full Name, Mailing Address, & Zip Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other(specify):		Aggregate Year-to-Date	
Full Name, Mailing Address, & Zip Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other(specify):		Aggregate Year-to-Date	
Full Name, Mailing Address, & Zip Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other(specify):		Aggregate Year-to-Date	
Full Name, Mailing Address, & Zip Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other(specify):		Aggregate Year-to-Date	

SUBTOTAL of Receipts This Page	\$5,476.12
TOTAL This Period	\$58,653.12

SCHEDULE F

**ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. §441a(d))**

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full)				
IOWA DEMOCRATIC PARTY (FEDERAL DIVISION)				
Has your Committee been designated to make coordinated expenditures by a political party committee? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
If YES, name the designating committee: Democratic Senatorial Campaign Committee				
Full Name, Mailing Address and ZIP Code of Subordinate Committee				
Democratic Senatorial Campaign Committee 430 E Capitol SE Washington, DC 20003				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
US Postmaster Des Moines, IA	Tom Harkin IOWA Senate Candidate	Postage	10/25/96	31,000.00
			10/29/96	7,000.00
			10/31/96	17,000.00
			Aggregate General Election Expenditure for this Candidate—\$ 137,680	
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate—\$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate—\$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate—\$				
SUBTOTAL of Expenditures This Page (optional)				55,000.00
TOTAL This Period (fill page this line number only)				

SCHEDULE F

**ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. 5441a(d))**

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full)				
IOWA DEMOCRATIC Party (Federal Division)				
Has your Committee been designated to make coordinated expenditures by a political party committee? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
If YES, name the designating committee: Democratic Senatorial Campaign Committee				
Full Name, Mailing Address and ZIP Code of Subordinate Committee				
Democratic Senatorial Campaign Committee 430 S. Capitol NE Washington, DC 20003				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
The Strategy Group 739 N Franklin #601 Chicago, IL 60610	Tom Harkin Iowa Senate Candidate	Design, Produce Mail Pieces	10/4/96	82,680.00
	Aggregate General Election Expenditure for this Candidate—4 \$2680.00			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate—5				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate—6				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate—7				
SUBTOTAL of Expenditures This Page (optional)				82680.00
TOTAL This Period (last page this line number only)				

