

# Fairfax County Democratic Committee



7243 Arlington Boulevard  
Falls Church, Virginia 22042  
703-573-6811  
Fax: 703-560-7004

Ginny Lehner Peters, Chair

July 20, 2004

Ms. Alissa V. Sangri,  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, DC 20463

RECEIVED  
FEDERAL  
OPERATIONS CENTER  
2004 JUL 26 AM 10:09

Dear Ms. Sangri:

I received your inquiry of June 23, 2004, regarding the report of the Fairfax County Democratic Committee for the period January 1, 2004, to March 31, 2004. A copy of your letter is enclosed.

You asked for itemization of information concerning salary and wages on Schedule B supporting line 30(b) of the Detailed Summary Page. Your observation is correct that we report no salary or wages in our report.

The Fairfax County Democratic Committee is staffed entirely with uncompensated volunteers, and there are no salaried or wage employees paid by others who devote any part of their compensated time as committee volunteers.

You also asked for further details about a transfer of \$11,500 from our Federal account to our non-Federal account. The transfer was to accommodate cash flow requirements in the non-Federal account. The transfer should have been reported on line 21a rather than line 21b of the First Quarter 2004 report of disbursements from the Federal account. On April 14, 2004, I amended our first quarter report to reflect this correction.

I have read sections 106.6 and 106.7 of the Code of Federal Regulations cited in your letter. I assure you that the transfer complied with the regulations in that 73 percent of the covered expenses were paid with Federal account funds. The entire deposit of \$11,500 could have been deposited in our non-Federal account in the first

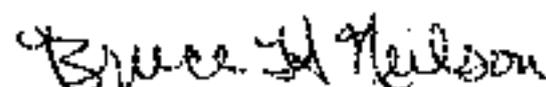
Page 2  
July 20, 2004

instance, which would have obviated the need to focus any attention on this expense. Future transfers will be accompanied by the appropriate documentation.

I hope you find this clarification responsive to your inquiry.

If you would like to discuss this or any other matter relative to the reports of the Fairfax County Democratic Committee, I would be pleased to make an appointment to meet with you in your office.

Sincerely,

  
Bruce H. Neilson, Treasurer

Encl



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20467

June 23, 2004

RQ-2

Bruce Neilson, Treasurer  
Fairfax County Democratic Committee - Federal  
7245 Arlington Boulevard  
Falls Church, VA 22042

**Response Due Date:**  
**July 23, 2004**

Identification Number: C00277541

Reference: April Quarterly Report (1/01/04-3/31/04)

Dear Mr. Neilson:

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. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

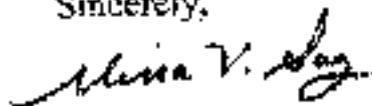
-Your report does not disclose any payments for salary or wages on Schedule B supporting Line 30(b) of the Detailed Summary Page. 11 CFR §100.24 defines as Federal Election Activity, services provided by an employee of a State, district or local party committee who spends more than 25 percent of their 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.

-Schedule B of your report discloses a transfer(s) totaling \$11,500 to what appears to be a non-federal account of your committee. Please be advised that committees that make disbursements in connection with federal and non-federal elections and have established separate federal and non-federal accounts, must allocate their expenses pursuant to 11 CFR §§106.6 and 106.7. Please provide further clarification regarding this transfer(s). The Commission recommends that you take steps to correct any non-compliance, and that you establish procedures to ensure future compliance with the allocation regulations.

Unlike previous election cycles, 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 in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. 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.

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 these 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 1, then press 2 to reach the Reports Analysis Division) or my local number (202) 694-1153.

Sincerely,



Alissa V. Sagri  
Campaign Finance Analyst  
Reports Analysis Division

Federal Election Commission  
**ENVELOPE REPLACEMENT PAGE  
 FOR INCOMING DOCUMENTS**

The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
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<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
<i>[Signature]</i>	7/26/04
PREPARER (5/2004)	DATE PREPARED