

## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 8, 2001

Charles A. Gueli, Treasurer Italian American Democratic Leadership Council 1101 Vermont Avenue, NW, Suite 1001 Washington, DC 20005

Identification Number:

C00299396

Reference: Year End (7/1/99-12/31/99), April Quarterly (1/1/00-3/31/00) and July

Quarterly (4/1/00-6/30/00) Reports

Dear Mr. Gueli:

This letter is to inform you that as of March 7, 2001 the Commission has not received your response to our requests for additional information dated February 14, 2001. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

An adequate response must be received at the Commission by March 28, 2001. 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.

If you should have any questions regarding this matter, please contact Erik Koeppen on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely.

Reports Analysis Division



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Charles A. Gueli, Treasurer Italian American Democratic Leadership Council 1101 Vermont Avenue, NW, Suite 1001 Washington, DC 20005

Identification Number:

C00299396

FFB 1 4 2001

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

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:

-Please amend Schedule B supporting Line 23 by providing the state, and congressional district, if applicable for each contribution made. 11 CFR  $\S104.3(b)(3)(ii)$  and (v)

-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 II4 or B, supporting Lines 21(a) or 21(b), respectively of the Detailed Summary Page. 2 U.S.C. §434(b)(5) 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 that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed <u>during</u> each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

-Line 21(a) of the Detailed Summary Page should only be used to report the federal and non-federal shares of allocable activities. If your committee has only one account, the total operating expenditures (administrative expenses) should be reported on Line 21(b). Please amend your report to confirm the nature of your expenditures and to provide the total on the appropriate line.

-On future reports, please disclose your cash-on-hand calendar year-to-date total in the box provided on Line 6(a) of the Summary Page.

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,

Erik W. Koeppen

Eile W. Koeppen

Reports Analyst

Reports Analysis Division