

February 16, 2010

Laura Sinram, Senior Campaign Finance Analyst Federal Election Commission 999 E Street, NW Washington, DC 20463

Re: Democratic State Central Committee of CA -Federal (#C00105668)
Amended October Monthly Report (9/1/09-9/30/09), received 10/23/09

Dear Ms. Sinram:

The Commission's preliminary review of the report referenced above raised questions concerning certain information contained in the report. We have addressed the questions below:

- 1. Schedule H4 During the July, August, and September reporting periods, no employee devoted more than 25% of their time during a month on activities in connection with a Federal election.
- 2. Schedule H4 supporting Line 21(a) of our report discloses a payment(s) for dental insurance, federal payroll taxes, finance assistant salary, health insurance, salary, and state payroll taxes. These payment(s) relate to an on-going fundraising ratio that is disclosed on our Schedule H2 and are not Federal election activity or activities in connection with a Federal election.
- 3. Schedule H4 of our report discloses \$20,665.47 in payments for fundraising services, human resources consulting and translation services to individuals. These individuals are not employees of the Party; they are independent contractors. These expenses are not Federal election activities or activities in connection with a Federal election.
- 4. Schedule H4 supporting Line 21(a) of our report discloses a payment(s) for newspaper ad that does not refer to a clearly identified candidate for Federal office and does not promote, support, attack or oppose any such candidate for Federal office.
- 5. You state that the transfer(s)-in disclosed on Line 21(a)(ii) Column A for July, August, and September total \$196,127.25 for the Administrative and Voter Drive categories. The transfer(s)-in from the non-federal account includes allocated expenses paid in the prior months (within the 60-day window). These transfers for shared activity do not exceed the non-federal share of the joint disbursements.
- 6. Schedule B The expenditures made for Fundraising: association member fees, Fundraising: bank charges, Fundraising: credit card services and Fundraising services (Fed program) were not made on behalf of specifically identified federal candidates. These expenses are associated with a small donor federal fundraising program for the party.

We have amended our October Monthly Report to correct the Schedule H2.

If you have any further questions, please contact me at (916) 442-5707.

Sincerely,

Katherine Moret Treasurer

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cc: Shawnda Westly, Executive Director Lance Olson, Legal Counsel