



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Edward Legg, Treasurer
Participation 2000 Inc.
236 Massachusetts Avenue, NE, #206
Washington, DC 20002

MAR 28 2001

Identification Number: C00221887

Reference: 12 Day Pre-Primary Report (7/1/00-8/16/00)

Dear Mr. Legg:

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:

-Your report discloses a negative ending cash balance of \$15,145.96. This suggests that you have either overdrawn your account, made a mathematical error, or incurred a debt. If your committee has incurred a debt or obligation, please show a zero balance on Line 8 of the Summary Page and reflect the amount and the nature of the debt on Schedule D and Line 10. 2 U.S.C. §434(b)(8)

-Please amend Schedule B supporting Line 23 by providing the office sought (i.e. House, Senate or President) for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

-Schedule B of your report discloses an in-kind contribution(s) designated for the general election, but made before the primary election (pertinent portion(s) attached). In-kind contributions of equipment, such as computers, with a long-term useful life (e.g., an election cycle, or perhaps longer) are similar to contributions of money and may be designated for elections beyond the next election, provided the contributor designates the contribution as such in writing. A contribution of this type of equipment is distinguishable from in-kind contributions that are used only for one particular election, such as non-exempt contributions of food or beverages consumed by primary election day workers, or printing or mailing costs

related to general election events or fundraisers. Please amend your report to include a description of the nature of the in-kind contribution(s) in question. If the in-kind contribution(s) on your report does not have a "long-term useful life", it may constitute an excessive contribution(s) for the primary election (see Advisory Opinion 1996-29).

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you must request a refund of the excessive amount(s) and/or notify the recipient, in writing, of your redesignation of the contribution. Refunds are reported on Schedule A supporting Line 16 of the Detailed Summary Page of the report covering the period in which they are made. Redesignations are reported as memo entries on Schedule B of the report covering the period in which the redesignation is made. 11 CFR §110.2(b) In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). Although the Commission may take further legal steps, prompt action by your committee to refund or seek redesignation of the excessive amount will be considered.

-Schedule B supporting Line 23 of your report discloses a contribution(s) to a candidate(s) for the 2000 Primary election; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an impermissible contribution for an election which has already occurred, you should notify the recipient and request a refund and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent

to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Schedule H3 of your report discloses transfers received from your non-federal account which occur outside the permissible transfer period. Please be advised that 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 these transfers-in from the non-federal account.

The Commission recommends that you immediately transfer the total excessive amount received by your federal account outside the 70-day time period back to your non-federal account. 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,



Donald L. Averett
Reports Analyst
Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule for each category of Disbursements Detailed Summary Page	PAGE 5	OF 5
		FOR LINE NUMBER 23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions, purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Participation 2000

FEC ID No. C0221887

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Scott Pullman 5 Daborn Road Rye, NY 10590 In-Kind Contribution Stipend	Mariann Connelly NJ-7 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/15/00	750.00 In-Kind
Timothaa Proctor-Letson 4061 Tod Avenue Warren, OH 44485 In-Kind Contribution Stipend	David Wu OR-1 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/15/00	750.00 In-Kind
Khalimah Shakir 446 Gulf Street San Antonio, TX 78202 In-Kind Contribution Stipend	Terri Van Horne PA-4 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/15/00	750.00 In-Kind
Schylar Meadows 1714 Parkdale Avenue Toledo, OH 43607 In-Kind Contribution Stipend	Regina Montoya Coggins Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/15/00	750.00 In-Kind
Ben Gibbs 1462 Willow Lake Drive Atlanta, GA 30329 In-Kind Contribution Stipend	Jay Inslee WA-1 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/15/00	750.00 In-Kind
Beth Wladyka 7 Wilson Avenue Rutherford, NJ 07070 In-Kind Contribution Stipend	Rick Larsen WA-2 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/15/00	750.00 In-Kind
Rudolph Taylor 509 Pelican Island Drive Florissant, MO 63031 In-Kind Contribution Travel	Rick Larsen WA-2 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/15/00	45.00 In-Kind
Gboyega Adegbola 3208 Oakmont Houston, TX 77021 In-Kind Contribution Stipend	Tammy Baldwin WI-2 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/15/00	750.00 In-Kind
David Zetlin-Jones 314 West 71st Street New York, NY 10023 In-Kind Cont. Travel	Kenneth Toltz CO-6 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/15/00	346.34 In-Kind

SUBTOTAL of Disbursements This Page (optional) 5,641.34

TOTAL This Period (last page this line number only). 20,503.73

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Primary: 9/12/2000

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule for each category of Detailed Summary Page	PAGE 5	OF 5
		FOR LINE NUMBER 23

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NAME OF COMMITTEE (In Full) FEC ID No. C00221887
 Participation 2000

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A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period (In-Kind)
Susan Markham 711 1/2 A Street, SE Washington, DC 20003	Travel Reimbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7/31/00 8/1/00	759.00 1,478.89
B. Full Name, Mailing Address and ZIP Code Byrum for Congress PO Box 26191 Lansing, MI 48909 <i>Primary: 8/8/2000</i>	Purpose of Disbursement Dianne Byrum MI-B Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	7/31/00	251.00 MEMO
C. Full Name, Mailing Address and ZIP Code Mike Ross for Congress Comm. PO Box 360 Prescott, AR 71857	Purpose of Disbursement Mike Ross AR-4 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	7/31/00	308.00 MEMO
D. Full Name, Mailing Address and ZIP Code Van Horne for Congress PO Box 444 New Kensington, PA 15068	Purpose of Disbursement Terry Van Horne PA-4 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	7/31/00	200.00 MEMO
E. Full Name, Mailing Address and ZIP Code Bill Nelson for US Senate PO Box 10962 Tallahassee, FL 32302	Purpose of Disbursement Bill Nelson FL-SEN Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/7/00	414.00 MEMO
F. Full Name, Mailing Address and ZIP Code Mark Udall for Congress 777 29th Street, Suite 100 Boulder, CO 80303	Purpose of Disbursement Mark Udall CO-2 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/7/00	282.50 MEMO
G. Full Name, Mailing Address and ZIP Code Jay Inslee for Congress PO Box 33021 Seattle, WA 98133	Purpose of Disbursement Jay Inslee WA-1 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/7/00	20.00 MEMO
H. Full Name, Mailing Address and ZIP Code Mike Ross for Congress Comm. PO Box 360 Prescott, AR 71857	Purpose of Disbursement Mike Ross AR-4 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/7/00	20.00 MEMO
I. Full Name, Mailing Address and ZIP Code Eleanor Jordan for Congress PO Box 2115 Louisville, KY 40221 <i>Primary: 5/23/2000</i>	Purpose of Disbursement Eleanor Jordan KY-3 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/7/00	20.00 MEMO

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SUBTOTAL of Disbursements This Page (optional) 2,237.89

TOTAL This Period (last page this line number only)

