RQ-2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mary Maloney, Treasurer
Iowa Democratic Party
5661 Fleur Drive
Des Moines, IA 50321

JUL 19 2001

Identification Number: C00035600

Reference: 30 Day Post-General Report (10/19/00-11/27/00)

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) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee and its affiliates from receiving contributions from another political committee or person in excess of $5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of $5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). 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 granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of $68,771.66 in contributions from individuals/persons other than political action committees. The sum of the entries itemized on Schedule A, however, indicates the total to be $65,071.66 (due to the omission of page 15 of 16). Please amend your report to clarify the discrepancy.

-Schedule H4 discloses a disbursement(s) which is categorized as an exempt expense(s); however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the direct costs of each exempt activity in which the committee disburses funds for both federal and non-federal purposes. The costs are allocated according to the time and space method and reported on Schedule H2. 11 CFR §106.5(e). Please file a Schedule H2 to disclose the ratio for the exempt activity.

-Schedule H4 disclose 100% federal (exempt expenses) activity. Please be advised that by definition, this activity does not qualify as a shared expense to be allocated between your federal and non-federal accounts. This activity should be itemized on a Schedule B for Line 21(b) of the Detailed Summary Page. Any reimbursement from your committee's non-federal account for any portion of this activity is not permissible and must be returned. Please amend your report to clarify this discrepancy.

-Schedule A supporting Line 12 discloses a transfer(s)-in from Democratic National Committee. Schedule H4 supporting Line 21(a) reflects payments for posts and yard sign supplies, buttons, t-shirts, bumper stickers, sign wires, and yard signs-exempt activity. Please be advised that a state or local

party committee may pay for campaign materials (such as bumper stickers) that are distributed by volunteers in connection with activity on behalf of the party's nominees in a general election. 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 (mailings by a commercial vendor or from commercial lists); 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 to the Campaign Guide for Party Committees.

Please clarify the nature of the transfer(s)-in and subsequent payments for the aforementioned disbursement(s). 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.

-Please clarify all expenditures made for Ads, Radio Ads for GOTV, and Ad Buy on Schedule(s) H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E, or F supporting Lines 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

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,

Edward D. Ryan

Edward D. Ryan
Reports Analyst
Reports Analysis Division

20036634685

SCHEDULE A

ITEMIZED RECEIPTS

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

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)

	Full Name, Mailing Address, & Zip Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt This Period
A	NEA for Children & Public Education 1201 16th St NW Suite 421 Washington, DC 20036		10/19/00	5,000.00
	Receipt For: ☐ Primary ☐ General ☐ Other(specify):	Aggregate Year-to-Date $5000.00		
B	United Food and Commercial Workers Int. Union.Ballot Club 1775 K. St. NW Washington, DC 200061598		10/20/00	5,000.00
	Receipt For: ☐ Primary ☐ General ☐ Other(specify):	Aggregate Year-to-Date $5000.00		
C	People for the American Way Voters Alliance 2000 M. St. #400, NW Washington, DC 20036		10/23/00	5,000.00
	Receipt For: ☐ Primary ☐ General ☐ Other(specify):	Aggregate Year-to-Date $5000.00		
D	Committee on Letter Carriers Political Education 100 Indiana Ave NW Washington, DC 20001		10/23/00	5,000.00
	Receipt For: ☐ Primary ☐ General ☐ Other(specify):	Aggregate Year-to-Date $5000.00		
E	Donna Smith Congress Comm PO Box 384 Epworth, IA 52045		10/31/00	5,000.00
	Receipt For: ☐ Primary ☐ General ☐ Other(specify):	Aggregate Year-to-Date $5000.00		
F	Boswell for Congress 224 S State St Lamoni, IA 50140		11/03/00	49,000.00
	Receipt For: ☐ Primary ☐ General ☐ Other(specify):	Aggregate Year-to-Date $66000.00		
G	Democrats 2000 1311 L Street NW Suite 30 Washington, DC 20005		11/03/00	5,000.00
	Receipt For: ☐ Primary ☐ General ☐ Other(specify):	Aggregate Year-to-Date $5000.00		

SUBTOTAL of Receipts This Page $79,000.00

TOTAL This Period