FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

April 20, 1995

Elizabeth Birch, Treasurer
Human Rights Campaign Fund
Political Action Committee
1101 14th Street, NW, 2nd Floor
Washington, DC 20005

Identification Number: C00235853

Reference: November Monthly Report (10/1/94-10/31/94)

Dear Ms. Birch:

This letter is to inform you that as of April 19, 1995, the Commission has not received your response to our request for additional information, dated March 29, 1995. This notice request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Elizabeth Birch, Treasurer
Human Rights Campaign Fund
Political Action Committee
1101 14th Street, NW
Second Floor
Washington, DC 20005

MAR 29 1995

Identification Number: C00235853

Reference: November Monthly Report (10/1/94-10/31/94)

Dear Ms. Birch:

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 portions attached) discloses an apparent contribution(s) from a corporation(s). 2 U.S.C. §441b(a)) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have received a corporate contribution(s), you must transfer-out the impermissible funds to an account not used to influence federal elections or refund the full amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all transfers-out and refunds should be made within thirty days of the treasurer's receipt of the impermissible funds. The Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

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 transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

-Schedule B 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(a) precludes a multicandidate committee from making a contribution to a candidate for federal office in excess of $5,000 per election.

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 should notify the recipient and request a refund of the amount in excess of $5,000 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 request sent to the contributor. 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 the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-The identification of each contributor, including the person's occupation and name of employer, must be provided if the person has contributed in excess of $200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry lacking a contributor's mailing address.

Note: If your committee has made attempts, either by a written request or by an oral request documented in writing to obtain this information from each contributor, your committee may have exercised "best

efforts." Under revised 11 CFR 104.7(b), such effort shall consist of an initial clear and conspicuous request for the name, mailing address, occupation, and name of employer of each individual who has contributed over $200 in the calendar year which informs the contributor that the reporting of such information is required by law. If necessary, your committee must make a written follow-up request or an oral follow-up request documented in writing, within thirty days with no additional solicitation. Subsequently, the committee should report any changes provided by the contributor or any additional information which is in the committee's records. If you believe that your committee satisfies the "best efforts" provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contribution information. Clarification regarding "best efforts" should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. 11 CFR §104.3(a)(4)(i)

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions from other political committees should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

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. My local number is (202) 219-3580.

Sincerely,

Debbie Manzano

Debbie Manzano
Reports Analyst
Reports Analysis Division

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SCHEDULE A ITEMIZED RECEIPTS
For Line Number 11(a)

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 purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in full): Human Rights Campaign Fund

Cornillie, James	Employer:	Date	Amount
	Occupation:		
	Aggregate to Date: 300.00	10/07/94	300.00

Corry, James 29789 Red Leaf Dr Southfield, MI 48076	Employer:	Date	Amount
	Occupation:		
	Aggregate to Date: 300.00	10/04/94	300.00

redit Union One, 450 East Nine Mile Road erndale, MI 48220	Employer:	Date	Amount
	Occupation:		
	Aggregate to Date: 1,500.00	10/20/94	1,500.00

Cunningham, Paula 341 S Lafayette Dearborn, MI 48124	Employer:	Date	Amount
	Occupation:		
	Aggregate to Date: 300.00	10/21/94	300.00

Davidson, M Gwen 2901 Boston St 510 Baltimore, MD 21224	Employer:	Date	Amount
	Occupation:		
	Aggregate to Date: 350.00	10/07/94	350.00

Dechman, David 250 Beacon St 20 Boston, MA 02116	Employer:	Date	Amount
	Occupation:		
	Aggregate to Date: 700.00	10/21/94	700.00

ecker, Curt W Read St # 2 Baltimore, MD 21201-5314	Employer: NAPAS	Date	Amount
	Occupation: Attorney		
	Aggregate to Date: 830.00	10/24/94	100.00

Subtotal this page: 3,550.00

SCHEDULE A ITEMIZED RECEIPTS
For Line Number 11(a)

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NAME OF COMMITTEE (in full): Human Rights Campaign Fund

Sanders, Eric 420 W 23rd St 8b New York, NY 10011	Employer: Self-employed Occupation: Marketing Aggregate to Date: 450.00	Date 10/24/94	Amount 100.00
Sayers, Steven 319 Marlborough St Boston, MA 02116	Employer: Occupation: Aggregate to Date: 350.00	Date 10/13/94	Amount 350.00
Schoeninger, James 1329 Corcoran St Nw Washington, DC 20009	Employer: Dale Denton Real Es. Occupation: Realtor Aggregate to Date: 525.00	Date 10/05/94	Amount 525.00
Schwoebel, John 599 Campbell Rd Douglas, MI 49406	Employer: Occupation: Aggregate to Date: 300.00	Date 10/20/94	Amount 300.00
Scoppa, Margaret 79 Mary St Arlington, MA 02174	Employer: Occupation: Aggregate to Date: 350.00	Date 10/13/94	Amount 350.00
Sederlaguens Inc, 1817 Adams Mill Road Nw Washington, DC 20009	Employer: Occupation: Aggregate to Date: 1,750.00	Date 10/05/94	Amount 1,750.00
Shellabarger, Steven 1011 City Park Ave Columbus, OH 43206-2513	Employer: Self employed Occupation: Real Estate Dev Aggregate to Date: 2,305.00	Date 10/21/94	Amount 250.00
	Subtotal this page:		3,625.00

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Contributions to Federal Candidates

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

PAGE 2 OF 4

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 or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Human Rights Campaign Fund Political Action Committee #C00235853

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
A. JOSEPH LIEBERMAN '94 P.O. BOX 83[illegible] HARTFORD, CT 06123-1294	SD CT-E POLITICAL CONTRIBUTION [X] Primary [ ] General [ ] Other (specify)	8/19/94	$1,000.00
B. KARAN ENGLISH P.O. BOX 2365 MESA, AZ 85214	HD AZ-06 POLITICAL CONTRIBUTION [X] Primary [ ] General [ ] Other (specify)	8/19/94	$1,500.00
C. MARIA CANTWELL FOR CONGRESS P.O BOX 144 MOUNTLAKE TERRACE, WA 98043	HD WA-01 POLITICAL CONTRIBUTION [X] Primary [ ] General [ ] Other (specify)	8/19/94	$500.00
D. NANCY JOHNSON FOR CONGRESS P.O. BOX 1986 NEW BRITAIN, CT 06050	HD CT-06 POLITICAL CONTRIBUTION [X] Primary [ ] General [ ] Other (specify)	8/19/94	$1,500.00
E. COPPERSMITH FOR SENATE P.O. BOX 44841 PHOENIX, AZ 85064	HD AZ-S POLITICAL CONTRIBUTION [X] Primary [ ] General [ ] Other (specify)	8/19/94	$2,500.00
F. STENY HOYER FOR CONGRESS 7905 MALCOLM ROAD CLINTON, MD 20735	HD MD-05 POLITICAL CONTRIBUTION [X] Primary [ ] General [ ] Other (specify)	8/19/94	$2,500.00
G. LYNN SCHENK FOR CONGRESS 141 UNIVERSITY AVENUE, #2 SAN DIEGO, CA 92103	HD CA-49 POLITICAL CONTRIBUTION [ ] Primary [X] General [ ] Other (specify)	8/23/94	$500.00
H. OBERLY FOR [illegible] SENATE 3409 LANC[illegible] PIKE WILMINGTON, [illegible] 19805	SD DE-S POLITICAL CONTRIBUTION [X] Primary [ ] General [ ] Other (specify)	8/25/94	$5,000.00
I. GENE GREEN CONGRESSIONAL CAMPAIGN P.O. BOX 16128 HOUSTON, TX 77222	HD TX-29 POLITICAL CONTRIBUTION [ ] Primary [X] General [ ] Other (specify)	8/25/94	$1,000.00

SUBTOTAL of Disbursements This Page (continued) 16,000.00

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

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

Contributions to Federal Candidates

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

PAGE 4 OF 6

FOR LINE NUMBER 23

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NAME OF COMMITTEE (In Full)

Human Rights Campaign Fund Political Action Committee #C00235853

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Friends and Neighbors of Steve Gunderson P.O. Box 1994 Osseo, WI 54758	HD WI-03 Political Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/18/94	$1,500.00
B. Oberly for U.S. Senate 3409 Lancaster Pike Wilmington, DE 19805	S DE-S Political Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/18/94	$2,500.00
C. Rolando Rios for Congress P.O. Box 690028 San Antonio, TX 78269	HD TX-23 Political Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/18/94	$2,500.00
D. Tom Sawyer Committee 1655 West Market Street Suite J Akron, OH 44313	HD OH-14 Political Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/18/94	$1,500.00
E. Ron Coleman for Congress P.O. Box 70047 Washington, DC 20024	HD TX-16 Political Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/21/94	$2,500.00
F. Foley for Congress P.O. Box 2121 Spokane, WA 99210	HD WA-05 Political Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/21/94	$2,500.00
G. Friends of Marjorie Margolies-Mezvinsky P.O. Box 157 Norberth, PA 19072	HD PA-13 Political Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/12/94	$2,500.00
H. Woolsey for Congress 1301 Redwood Way #100 Petaluma, CA 94954	HD CA-06 Political Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/21/94	$1,500.00
I. Bill Luther for Congress 4009 Tenth Avenue Anoka, MN 55303	HD MN-06 Political Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/28/94	$1,500.00

SUBTOTAL of Disbursements This Page (optional) 18500.00

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

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