



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

November 17, 1994

Robert T. Matsui, Treasurer
DNC Services Corporation/Democratic
National Committee
430 South Capitol Street SE
Washington, DC 20003

Identification Number: C00010603

Reference: April Quarterly (1/1/94-3/31/94) and July Quarterly
(4/1/94-6/30/94) Reports

Dear Mr. Matsui:

This letter is to inform you that as of November 16, 1994, the Commission has not received your response to our requests for additional information, dated October 26, 1994. 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).

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 Debbie Manzano 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

Enclosures

94037440258



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

RQ-2

Robert T. Matsui, Treasurer
DNC Services Corporation/Democratic
National Committee
430 South Capitol Street SE
Washington, DC 20003

OCT 26 1994

Identification Number: C00010603

Reference: April Quarterly Report (1/1/94-3/31/94)

Dear Mr. Matsui:

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(c) preclude a political committee which is established and maintained by a national political party, and any affiliated committees, from accepting contributions from a person or political committee in excess of \$20,000 in calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If you have received an excessive contribution(s), you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$20,000 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). 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

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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 covering the period 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.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). 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. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if

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no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

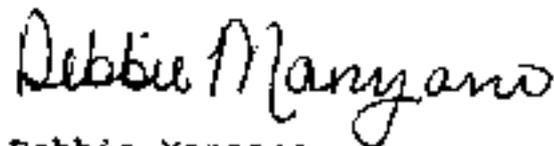
Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-On Schedule H3, you have failed to provide a unique identifying title or code for Line(s) ii, Columns A and B for the 3/2/94 (page 19 of 25) transfer. Please amend your report to correctly identify this event(s). 11 CFR 104.10

-Your report discloses offsets to operating expenditures on Schedule A supporting Line 15 to Presidential Inaugural Committee and Clinton-Gore Pres. Transition. Please clarify the nature of these refunds.

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
Reports Analyst
Reports Analysis Division

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ITEMIZED RECEIPTS
 DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE
 SCHEDULE A

ADDRESS CITY STATE ZIPCODE	OCCUPATION EMPLOYER	YTD AGGREGATE	DATE	AMOUNT PERIOD
Mr. Norman Jewison C/O BOLTON FILMS LTD 9336 Washington Blvd Culver City, CA 90232	Producer Bolton Films	500.00	3/03/94	500.00
Mr. Shin-Jien Jin 6525 Sawyer Road San Antonio, TX 78238	Acupuncturist Self-Employed	1,000.00	2/08/94	1,000.00
Walter Josison 426 Colony Rd Westport, CT 06880	retired	300.00	3/04/94	300.00
Mr. Robert Joffe 300 West End Avenue Apartment 13A New York, NY 10023	Attorney Cravath, Swaine	20,250.00	1/26/94 1/31/94 1/31/94	250.00 10,000.00 10,000.00
Mr. Frank Johansen 901 Roanoke Ct Apt 2B Lincoln, NE 68510	Wheat Farmer Self-Employed	500.00	1/05/94 1/25/94	375.00 125.00

SCHEDULE A

ITEMIZED RECEIPTS

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)
Democratic National Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Victory 90 Federal Democratic National Committee 430 S. Cap. St. SE, WDC 20003 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	02-24-94	\$3,762.56
Aggregate Year-to-Date > \$ 3,762.56			
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
Aggregate Year-to-Date > \$			
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
Aggregate Year-to-Date > \$			
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
Aggregate Year-to-Date > \$			
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
Aggregate Year-to-Date > \$			
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
Aggregate Year-to-Date > \$			
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
Aggregate Year-to-Date > \$			

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SUBTOTAL of Receipts This Page (optional) _____

TOTAL This Period (last page this line number only) _____ \$3,762.56

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