



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

February 15, 2001

Brian K. Bond, Treasurer
Gay and Lesbian Victory Fund
1012 14th Street, NW, Suite 1000
Washington, DC 20005

Identification Number: C00251835

Reference: September Monthly (8/1/00-8/31/00) and October Monthly (9/1/00-9/30/00) Reports

Dear Mr. Bond:

This letter is to inform you that as of February 14, 2001 the Commission has not received your response to our requests for additional information dated January 23, 2001. 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).

An adequate response must be received at the Commission by March 7, 2001. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions regarding this matter, please contact Antoinette Kitchen on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson", is written over the typed name.

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Brian K. Bond, Treasurer
Gay and Lesbian Victory Fund
1012 14th Street, NW, Suite 1000
Washington, DC 20005

JAN 23 2001

Identification Number: C00251835

Reference: September Monthly Report (8/1/00-8/31/00)

Dear Mr. Bond:

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:

-On Schedule A supporting Line 15 of the Detailed Summary Page, your committee discloses what appears to be refunds or rebates for operating expenditures (pertinent portion attached). However, a review of your previously filed reports does not appear to disclose the original disbursement(s) to this vendor. Please amend your report to provide clarifying information regarding these transactions.

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request

for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2))

The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

-Schedule A supporting Line 15 of your report does not disclose aggregate year-to-date totals for the offsets to operating expenditures. Please amend your report to provide the omitted aggregate year-to-date totals.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, the FEDERAL SHARE when added to the NON-FEDERAL SHARE, should equal the TOTAL AMOUNT. Your report discloses a payment to Sloan Wiesen where the total of the FEDERAL SHARE(S) and the NON-FEDERAL SHARE(S) does not equal the TOTAL AMOUNT(S). Please amend your report to clarify this apparent discrepancy.

-Your report discloses the apparent--disbursement of earmarked contributions outside the permissible time period. As a conduit or

GAY AND LESBIAN VICTORY FUND
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intermediary, a committee must forward earmarked contributions, along with a transmittal report, within ten (10) days of receiving an earmarked contribution greater than \$50 and within thirty (30) days if the earmarked contribution is \$50 or less. 11 CFR §§102.8 and 110.6(c)(1)(iii)

If the earmarked contributions were incompletely or incorrectly disclosed, you should amend your report with clarifying information.

Although the Commission may take further legal action regarding the earmarked contributions, your prompt action addressing the concerns raised 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,



Antoinette Kitchen
Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 2

FOR LINE NUMBER 15

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: **Gay and Lesbian Victory Fund**

Full Name, Mailing Address and Zip Code	Name of Employer	Date	Amount
Clarenbach, David	Health Insurance	8/1/00	137.40
P.O. Box 34522	Occupation:		
Washington, DC 20043			

Election: ☐ Primary ☐ General ☐ Other : Aggregate Year-to-Date: \$

Full Name, Mailing Address and Zip Code	Name of Employer	Date	Amount
Gay & Lesbian Victory Foundation	Conference Fee	8/21/00	717.75
1012 14th Street, NW	Occupation:		
Washington, DC 20005			(Allocable NF Portion Transferred September 2000)

Election: ☐ Primary ☐ General ☐ Other : Aggregate Year-to-Date: \$

Full Name, Mailing Address and Zip Code	Name of Employer	Date	Amount
Gay & Lesbian Victory Foundation	Travel Expenses	8/21/00	6,000.67
1012 14th Street, NW	Occupation:		
Washington, DC 20005			

Election: ☐ Primary ☐ General ☐ Other : Aggregate Year-to-Date: \$

Full Name, Mailing Address and Zip Code	Name of Employer	Date	Amount
Gay & Lesbian Victory Foundation	Delivery Expenses	8/21/00	317.15
1012 14th Street, NW	Occupation:		
Washington, DC 20005			

Election: ☐ Primary ☐ General ☐ Other : Aggregate Year-to-Date: \$

Full Name, Mailing Address and Zip Code	Name of Employer	Date	Amount
Duffy, Margaret	Return Unused Travel Expenses	8/24/00	469.09
1012 14th St., NW, #1000	Occupation:		
Washington, DC 20005			

Election: ☐ Primary ☐ General ☐ Other : Aggregate Year-to-Date: \$

SUBTOTAL of Receipts This Page (optional)

7,642.06

TOTAL this Period (last page this line number only)