



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

May 4, 2005

Habib M. Habib, Treasurer  
Washington State Democratic Central Committee  
P.O. Box 4027  
Seattle, WA 98104

**Response Due Date:**  
**June 3, 2005**

Identification Number: C00114439

Reference: Amended September Monthly Report (8/1/04-8/31/04), received 3/24/05

Dear Mr. Habib:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-On Schedule H2, you disclose the ratio for "DMail 04-06" to be new; however, Schedule H2 of your Amended June Monthly Report disclosed a ratio for this activity/event which is identical to the one given in this report. Please amend your report to clarify this discrepancy. 11 CFR §§104.10 and 104.17

-Schedule A supporting Line 12 discloses a transfer(s)-in from the Democratic National Committee. Schedule H6 supporting Line 30(a) reflects payments for Federal Election Activity. Please be advised that under 11 CFR §300.34, a state, district or local party committee must not use any Federal funds transferred to it from a national party committee or any other State, district or local party committee, as the Federal component of an expenditure or disbursement for Federal Election Activity. Furthermore, your committee must itself raise the Federal component of expenditure or disbursement allocated between Federal and Levin funds.

Please clarify whether the transfer(s)-in was used for the subsequent payments for Federal Election Activity. In addition, please clarify the procedures you are currently using to ensure that Federal funds transferred to your committee from national, state, district and local party committees are not being used for Federal Election Activity.

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-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H6 of your report to clarify the following description(s): "FEA - Matchbacks." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

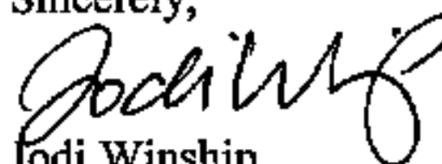
-On Schedule L-B supporting Line 4(a) of the Schedule L Aggregation Page for the Victory 04 Levin account, you have failed to include the purpose of disbursement for the payment made to WSDCC FEDERAL II. Please amend your report to include this missing information.

-Schedule L-B, supporting Line 4(a) of the Schedule L Aggregation Page for the Victory 04 Levin account discloses a \$51,400 disbursement of Levin funds to WSDCC FEDERAL II for voter registration activity on 8/20/04; however, a Schedule H5 has not been filed to disclose the receipt of the transfer of Levin funds into your federal account. Furthermore, Schedule H3 supporting Line 18(a) of the Detailed Summary Page discloses a \$51,400 transfer-in to your federal account on 8/20/04, of apparent non-federal funds from your WSDCC Exempt II account for "Maggies 04," "DMail 04-05," and "Generic Voter Drive" expenses. Please amend your report to clarify these discrepancies.

**Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. 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.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1136.

Sincerely,



Jodi Winship  
Campaign Finance Analyst  
Reports Analysis Division

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