



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

February 16, 1995

Charles A. Gueli, Treasurer
Italian American Democratic
Leadership Council
1828 L Street NW
Suite 1010
Washington, DC 20036

Identification Number: C00299396

Reference: 30 Day Post-General Report (10/1/94-11/28/94)

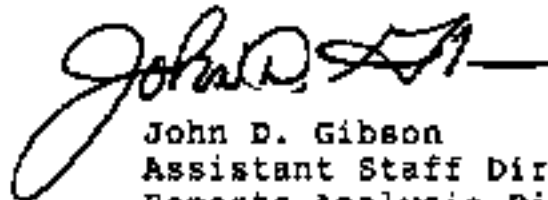
Dear Mr. Gueli:

This letter is to inform you that as of February 15, 1995, the Commission has not received your response to our request for additional information, dated January 25, 1995. This notice requests 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 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 regarding this matter, please contact Erica Holder 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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Charles A. Gueli, Treasurer
Italian American Democratic
Leadership Council
1828 L Street NW
Suite 1010
Washington, DC 20036

JAN 25 1995

Identification Number: C00299396

Reference: 30 Day Post-General Report (10/1/94-11/28/94)

Dear Mr. Gueli:

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:

-Political committees which have cash on hand at the time of registration must disclose the source of the funds. The balance is assumed to be composed of those contributions most recently received by the committee prior to registration. Please identify the source of these contributions on a memo Schedule A. 11 CFR §104.12

-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

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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 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 26 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.

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from

ITALIAN AMERICAN DEMOCRATIC LEADERSHIP COUNCIL
PAGE 3

that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

Schedule B, supporting Line 23, discloses checks disbursed to Friends of Oberstark, DeFazio for Congress, and Schiliro for Congress for "checks stolen". The original itemization of these contributions must be reported on the appropriate reports.

-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 political committee, other than a multicandidate committee, from making a contribution to a candidate for federal office in excess of \$1,000 per election. Please refer to the Campaign Guide for information on how a committee qualifies for multicandidate status.

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 \$1,000 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)

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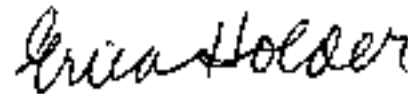
ITALIAN AMERICAN DEMOCRATIC LEADERSHIP COUNCIL
PAGE 4

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.

-Schedule B, supporting Line 23, discloses an in-kind contribution to American Vitners Association that lacks the amount of the contribution. Please amend your report to include this information.

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,



Erica Holder
Reports Analyst
Reports Analysis Division

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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 1 OF 2
FOR LINE NUMBER
13

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)

Italian American Democratic Leadership Council

9 95 40 45 34 20 46 22 63 87 88 5

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Mascara for Congress PO Box 1109 Washington, PA 15301	To Frank Mascara House Candidate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/3/94 10/24/94	\$ 500.00 \$ 500.00
Lidonato for Congress PO Box 30 New Philadelphia, OH 44663	To Greg Lidonato House Candidate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/3/94 10/24/94	\$ 500.00 \$ 500.00
Balacci for Congress 81 Main Street Bangor, Maine 04401	To John Balacci House Candidate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/3/94 10/24/94	\$ 500.00 \$ 500.00
Magazzu for Congress PO Box 87 Vineland, NJ 08360	To Lou Magazzu House Candidate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/3/94 10/24/94	\$ 500.00 \$ 500.00
Giglior for Congress 523 Barnhart Avenue Calumet City, IL 60409	To Frank Giglio House Candidate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/3/94 10/24/94	\$ 500.00 \$ 500.00
Schilliro for Congress 393 Sunrise Highway Lynbrook, NY 11563	To Philip Schilliro House Candidate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/3/94 10/24/94	\$ 500.00 \$ 500.00
Denari for Congress 16 Windward Court Aurora, IL 60506	To Peter Denari House Candidate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/1/94	\$ 500.00
Barca for Congress 512 56th Street Kenosha, WI 53140	To Peter Barca House Candidate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/1/94	\$ 3500.00
Lafocco for Congress PO Box 1553 Boise, ID 83701	To Larry Lafocco House Candidate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/1/94	\$ 2500.00

SUBTOTAL of Disbursements This Page (optional)

\$ 12,500.00

TOTAL This Period (last page this line number only)

ITEMIZED RECEIPTS
(Other Political Committees)

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)

Italian American Democratic Leadership Council

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A. Full Name, Mailing Address and ZIP Code

IADLC - Delano Committee
1828 L Street NW Suite 1010
Washington DC 20036

Receipt For: Primary General
 Other (specify):

Name of Employer

Date (month, day, year)

10/21/94

Amount of Each Receipt this Period

\$ 2726.08

Occupation

Aggregate Year-to-Date > \$ 2726.08

B. Full Name, Mailing Address and ZIP Code

Laborers Political League
905 16th Street NW
Washington DC 20006

Receipt For: Primary General
 Other (specify):

Name of Employer

Date (month, day, year)

11/3/94

Amount of Each Receipt this Period

\$ 1000.00

Occupation

Aggregate Year-to-Date > \$ 1000.00

C. Full Name, Mailing Address and ZIP Code

Great Western Financial Corp
Good Government Committee
9700 Caldale Ave, Chatsworth CA 91311

Receipt For: Primary General
 Other (specify):

Name of Employer

Date (month, day, year)

11/3/94

Amount of Each Receipt this Period

\$ 1000.00

Occupation

Aggregate Year-to-Date > \$ 1000.00

D. Full Name, Mailing Address and ZIP Code

IADLC/Banca Labora Donor Acct
1828 L Street NW, Suite 1010
Washington DC 20036

Receipt For: Primary General
 Other (specify):

Name of Employer

Date (month, day, year)

11/3/94

Amount of Each Receipt this Period

\$ 4375.00

Occupation

Aggregate Year-to-Date > \$ 4375.00

E. Full Name, Mailing Address and ZIP Code

Services Employees International Union
1313 L Street NW
Washington D.C. 20005

Receipt For: Primary General
 Other (specify):

Name of Employer

Date (month, day, year)

11/3/94

Amount of Each Receipt this Period

\$ 5000.00

Occupation

Aggregate Year-to-Date > \$ 5000.00

F. Full Name, Mailing Address and ZIP Code

(Empty)

Receipt For: Primary General
 Other (specify):

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

Aggregate Year-to-Date > \$

G. Full Name, Mailing Address and ZIP Code

(Empty)

Receipt For: Primary General
 Other (specify):

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

Aggregate Year-to-Date > \$

GROSS TOTAL of Receipts This Page (optional)

TOTAL This Period (fill page this line number only)

\$ 14,101.08

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