



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

February 22, 2001

Michelle Seligman, Treasurer  
Democrats 2000  
1311 L Street, NW, Suite 300  
Washington, DC 20005

Identification Number: C00230342

Reference: Amended July Quarterly (4/1/00-6/30/00), dated 11/15/00 and October Quarterly (7/1/00-9/30/00) Reports

Dear Ms. Seligman:

This letter is to inform you that as of February 21, 2001, the Commission has not received your response to our requests for additional information dated January 31, 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 14, 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 Thomas Maxwell 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,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosures



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Michelle Seligman, Treasurer  
Democrats 2000  
1311 L Street, NW, Suite 300  
Washington, DC 20005

Identification Number: C00230342

JAN 31 2001

Reference: October Quarterly Report (7/1/00-9/30/00)

Dear Ms. Seligman:

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 11(a)(i), your committee disclosed a contribution(s) with an aggregate year-to-date total(s) which is greater than the total receipts disclosed from this individual (pertinent portion(s) attached). Please provide clarifying information or amend the report covering the period during which the omitted transaction(s) occurred.

-Schedule A of your report discloses contributions from political committees that fail to include a full and/or recognizable name. Reporting only the name of the connected organization, abbreviating the name of the committee so it is unrecognizable, or using an indistinguishable acronym is inadequate. The following committee names from your report need further clarification: "AFSCME", "Machinists PAC" and "People for the American Way"

Please amend your report to include the missing information. 11 CFR §§100.12, 102.14(c) and 104.3(a)(4)(ii)

-Please amend Schedule B supporting Line 23 by providing the office sought (House, Senate or President), state and congressional district, if applicable, for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

-Please identify the address of the payee for the in-kind contribution(s) disclosed on Schedule B for Line 23.

-Schedule H2 of your report indicates that your committee participated in fundraising activities or events during the reporting period. However, there are no corresponding disbursements reflected on your Schedule H4. Note that you need not include activities on Schedule H2 if there are no corresponding payments made for the activity during the reporting period. If any disbursements were incorrectly reported, you should file an amended Schedule H4 with the correct unique identifying code or title, or provide clarifying information regarding the activities on Schedule H2.

-On Schedule H2, you have checked the exempt box for the AO35 HouseParty; however, on Schedule H4, disbursements for AO35 HouseParty are marked as Administrative/Voter Drive. For the public record, please clarify whether this event did in fact encompass more than one type of activity. If the activity or event should have been classified differently, please amend your report accordingly.

-On Schedule H2, you disclose the ratios for AO34 and AO36 to be the same as previously reported; however, it appears that these activities/events were not previously reported. Please amend your report to clarify this discrepancy. 11 CFR §104.10(a)(1)

-Schedule H4 discloses a disbursement(s) which is categorized as a fundraising expense(s); however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the direct costs of each fundraising event in which the committee collects both federal and non-federal funds. The costs are allocated according to the funds received ratio and reported on Schedule H2. 11 CFR §§106.5(f) and 106.5(d). Please file a Schedule H2 to disclose the ratio for the fundraising event(s).

-Schedule H4 of your report discloses a ratio adjustment for "AO36 2000 in 2000 Fundraiser". However, Schedule H2 does not disclose a revised ratio for this event. Please amend your report to include the revised ratio and the date the revision took effect.

-Please amend your report by providing the date for each disbursement itemized on Schedule H4 supporting Line 21(a).

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have not included the full name and/or mailing address for the vendor(s) listed. Please amend your report accordingly.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule H4 of your report to clarify the following description(s): "Office". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct EVENT YEAR-TO-DATE totals.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. A lost check should be properly disclosed on a separate Schedule H4, as a negative entry supporting Line 21(a) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Operating expenditures should be properly disclosed on a separate Schedule B, supporting Line 21(b) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-2 U.S.C. §434(b)(3) requires itemization of contributions from individuals and persons other than political committees, where the aggregate total from the contributor exceeds \$200 in a calendar year. In addition, 11 CFR

§104.3(a)(2)(i)(B) requires a committee to report the total amount of unitemized contributions (see Line 11(a)(ii) of the Detailed Summary Page). If a committee wishes to disclose contributions regardless of the amount contributed, the committee must separate (on separate receipt schedules) those contributors requiring itemization from those who are not required to be itemized. 11 CFR §104.3(a)(4)(i) For future filings, please submit your reports in this order.

-For future reporting, please be advised that only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 29.

-Schedule A, supporting Line 15 of your report includes a "lost check" totaling \$2,606.56 for what appears to be a previously disclosed shared payment. However, you have failed to provide any information regarding a transfer-out of the non-federal portion for this payment. Please provide this clarifying information and, in addition, please clarify if and when this check was reissued.

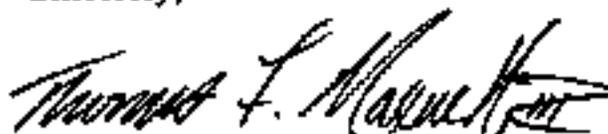
-Schedule H3 of your report discloses transfers received from your non-federal account which occur outside the permissible transfer period. Please be advised that transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of these transfers-in from the non-federal account.

The Commission recommends that you immediately transfer the total excessive amount received by your federal account outside the 70-day time period back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Schedule H2 discloses 100% non-federal activity. Please be advised that by definition, this activity does not qualify as a shared expense to be allocated between your federal and non-federal accounts. This activity should be itemized on a Schedule B for Line 21(b) of the Detailed Summary Page. Any reimbursement from your committee's non-federal account for any portion of this activity is not permissible and must be returned. Please amend your report to clarify this discrepancy.

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,



Thomas F. Maxwell, III  
Reports Analyst  
Reports Analysis Division

**SCHEDULE A ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page  
 Page 9 of 24  
 For Line Number 11a(i)

**Contributions from Individuals**

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 for such committee.

**NAME OF COMMITTEE (In Full)**  
 Democrats 2000

Full Name, Mailing Address & Zip Code	Name of Employer	Date(month day, year)	Amount of Each Receipt this period
Richard R Howe 88 Woodfield Drive Short Hills, NJ 07078 1654		08/04/00	2000.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation INFORMATION REQUESTED		
	Aggregate Year To Date > \$ 4000.00		
Richard R Howe 88 Woodfield Drive Short Hills, NJ 07078 1654		09/15/00	2000.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation INFORMATION REQUESTED		
	Aggregate Year To Date > \$ 6000.00		
Frances Hurst 3972 Plymouth Circle Madison, WI 53705 5212		08/31/00	500.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation Retired		
	Aggregate Year To Date > \$ 1000.00		
Frances Hurst 3972 Plymouth Circle Madison, WI 53705 5212		09/13/00	150.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation Retired		
	Aggregate Year To Date > \$ 1150.00		
Charles M Jacobs 255 West Street Northborough, MA 01532 1222		08/22/00	250.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation		
	Aggregate Year To Date > \$ 400.00		
Louis Jacobson 1585 Vmea Rd. Pacific Plads, CA 90272 2749	Retired	08/16/00	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation Retired		
	Aggregate Year To Date > \$ 300.00		

SUBTOTAL of Receipts This Page (optional)-----> 5200.00  
 TOTAL This Period (last page this line number only)----> 21530.00

**SCHEDULE A ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page  
 Page 8 of 16  
 For Line Number 11a (1)

**Contributions from Individuals**

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 for such committee.

**NAME OF COMMITTEE (in Full)**  
 Democrats 2000

Full Name, Mailing Address & Zip Code	Name of Employer	Date(month day, year)	Amount of Each Receipt this period
Seymour Graubard 2784 S Ocean Blvd Palm Beach, FL 33480 5592		05/09/00	200.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation INFORMATION REQUESTED		
	Aggregate Year To Date >	\$ 200.00	
Jacqueline Gupton 17498 Rocklands Drive Gordonsville, VA 22942 8368		04/10/00	200.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation INFORMATION REQUESTED		
	Aggregate Year To Date >	\$ 300.00	
Virginia Held 370 Riverside Drive # 7C New York, NY 10025 2107	CITY UNIV OF NY	05/24/00	100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation PROFESSOR		
	Aggregate Year To Date >	\$ 100.00	
Virginia Held 370 Riverside Drive # 7C New York, NY 10025 2107	CITY UNIV OF NY	06/12/00	100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation PROFESSOR		
	Aggregate Year To Date >	\$ 200.00	
Richard R Howe 88 Woodfield Drive Short Hills, NJ 07078 1654		05/05/00	1000.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation INFORMATION REQUESTED		
	Aggregate Year To Date >	\$ 1000.00	
Francis Hurst 3972 Plymouth Circle Madison, WI 53706 5212		05/13/00	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation Retired		
	Aggregate Year To Date >	\$ 500.00	

SUBTOTAL of Receipts This Page (optional)-----> 1900.00  
 TOTAL This Period(last page this line number only)----> 12000.00

