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Federal Elections Commission
Reports Analysis Division
999 E Street, NW
Washington, DC 20463

David Wilkinson
1933 Calvert Street, NW
Washington, DC 20009
July 27, 2000

Dear Reports Analysis Division:

I am the treasurer of Virginia Green Victory 2000, a non-connected, unauthorized committee supporting Ralph Nader for president in the state of Virginia. I am writing because of concerns I was faced with recently with regards to filing requirements. In a phone conversation on July 27th, Karen Miller of the FEC's Information division suggested that I write the letter for clarity's sake. In sum, to be on the safe side, I want to officially explain our situation.

My unauthorized committee filed its statement of organization on June 23rd. As of July 15th, VA Green Victory 2000 had raised \$415 and spent \$288.14, for transactions of \$803.14. This put us well below the \$1,000 threshold for official definition as a political committee. Aware of this, but not totally certain of the filing requirement for a committee in such a situation, I called the FEC several days before the July 15th deadline. Someone—a female, I think in the Information division, I did not take her name—informed me that as long as we were under the \$1,000 threshold, we did not have to file. I asked if we should file just to be on the safe side and she said not to bother: because it was unnecessary, I might as well not put the burden on myself. I took this as sound advice and did not send in a quarterly report for July 15th.

Today, July 27th, another person in my committee inquired about the filing and I felt moved to call again to be sure that we did not have to file on the 15th. Again, someone in the Information division verified that I had done the right thing by not filing since we hadn't reached the threshold. Twenty minutes later I decided to call back just to see if it we could file late for the July 15th reporting date, just so that we would have official documentation and to make the October 15th filing a little simpler. This time a person in the Information division said she thought that we should file and suggested that I speak to my committee's analyst.

I was connected to the appropriate department. They said the committee doesn't yet have an analyst and connected me to someone else who was not in. I left a message and then called back (I have really barraged the Commission with calls lately!). This time I was put in contact with Dominick Ciaraldi, an analyst who said that not only were we required to file on the 15th, but that we likely face fines for not filing. He suggested I check out the fines section of the website, which I did. The "fine calculator" suggested that we would have to pay a fine of \$400. This is when I began to get nervous—we only have about \$150 in the bank.

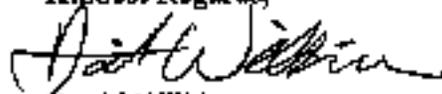
So, I called yet again to inquire about the fine. That is when I was put in touch with the great Karen Miller in the Information division. She was very knowledgeable and allayed my fears about having to pay a fine, saying that since we had not passed the \$1,000 threshold, we were not officially a political committee and for that reason will not be fined by the Commission. She also asserted that the committee should indeed have filed on July 15th, despite the advice I had received to the contrary. I will file that as soon as possible.

In conclusion, the advice I had received on two separate occasions from people at the FEC asserting that I did not have to file was wrong. We should have filed on July 15th, so we are late. But because we were not officially a political committee at the time, we won't be fined. I will file the July 15th report within the next couple of days. I will be absolutely certain to file on time for the October 15th quarterly report and the following reports.

If you need to contact me about this matter or any other, I may be reached at my work phone: 212-326-3504, or via email: captspaulding@hotmail.com. (Note: my phone number will be changing after the 11th of August.)

Thanks for your patience with this tediously long letter.

Kindest Regards,



David Wilkinson

Treasurer, VA Green Victory 2000

COMMITTEE ID: C00359141

Federal Election Commission

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