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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 27, 2000

Peter Dickinson, Treasurer
Campaign for Working Families
499 South Capitol Street, SW, Suite 410
Washington, DC 20003

Identification Number: C00325076

Reference: Year End Report (7/1/99-12/31/99)

Dear Mr. Dickinson:

This letter is to inform you that as of April 26, 2000 the Commission has not received your response to our request for additional information, dated April 5, 2000. 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).

The Commission is in receipt of your April Monthly Report dated April 20, 2000; however, it does not address the matters in the letter referenced. 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 Andrew Dodson 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

Enclosure

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Peter Dickinson, Treasurer
Campaign for Working Families
499 South Capitol Street, SW, Suite 410
Washington, DC 20003

APR 5 2000

Identification Number: C00325076

Reference: Year End Report (7/1/99-12/31/99)

Dear Mr. Dickinson:

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:

-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 <u>no later than 30 days</u> 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.

-Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of $245,391 in contributions from individuals. The sum of the entries itemized on Schedule A, however, indicates the total to be $239,238. Please amend your report to clarify the discrepancy.

-Payments made to credit card companies must identify the original vendors from which you have purchased an item or service if your payments to these vendors have exceeded $200 this year. Please amend your report by providing the mailing address, date, amount, and purpose of such payments as required by 11 CFR §104.9(b).

-The beginning cash balance of this report should equal the ending balance of your 1999 Mid Year Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Line 6(a) of the Summary Page represents the total cash-on-hand as of January 1, 1999. This figure should be the same on all the reports covering the calendar year. Please amend your report to clarify the change made in Line 6(a).

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,

Andrew J. Dodson
Senior Reports Analyst
Reports Analysis Division

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