



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

William W. Waybourn, Treasurer
Gay and Lesbian Victory Fund
P.O. Box 34715
Washington, DC 20043

MAR 23 1994

Identification Number: C00251835

Reference: Mid-Year Report (1/1/93-6/30/93)

Dear Mr. Waybourn:

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:

-Your report includes computer produced formats of FEC Form 3X - Schedules A, B and H4. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. (11 CFR §104.2(d))

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include a unique identifying title or code for the PURPOSE/EVENT for the payments made to Ron Spann, Gary Steinsmith, Diane Mallarias Productions, Litho Art, and Pacific Travel. 11 CFR §104.10. Please amend this report (including all affected schedules) to provide a unique identifying title or code for each PURPOSE/EVENT.

-Schedules H2 and H4 of your report disclose transfers received from your non-federal account which occur during the permissible transfer period. Please be advised that transfers from a non-federal account 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). The Commission recommends that you establish procedures to ensure future compliance with the allocation regulations.

-Schedule H3 of your report discloses a transfer received from your non-federal account on 2/18/93 for EVD00393 and 2/18/93 for EVD00193. These events have not been disclosed on a Schedule H2. All committees are required to allocate the direct costs of each fund-raising event in which the committee collects both

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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 106.6(d). Please file a Schedule H2 to disclose the ratio for the fundraising events. Additionally, there are no corresponding disbursements for these events reflected on Schedule H4. If any disbursements were incorrectly reported, you should file an amended Schedule H4 with the correct unique identifying code or title.

-It is not necessary to include a copy of the Best Efforts solicitation for each contributor with your report. One sample solicitation letter is sufficient.

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,

Jennifer K. Wall

Jennifer K. Wall
Reports Analyst
Reports Analysis Division



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