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2001 SEP 26 A 9 36

Jefferson County Democratic Party

September 18, 2001

Ms. Alice Kang
Report Analyst
Federal Election Commission
999 E. Street, N.W.
Washington, D.C.

Re: Response to your attached letters of September 5, 2001 and September 13, 2001.

Dear Ms. Kang,

The amounts you referred to which appeared on our 30 Day Post-General Report (10/19/00 - 11/27/00) and our October Quarterly Report (7/1/00 - 9/30/00) were reimbursements for voter drive materials and expenses (Door Hangers, Flyers, Handouts) for the general election of 2000. A major portion of these materials were used by the Federal Candidate Committee that is listed on our schedule A. The usual and normal charge was agreed upon and assessed the committee for the material. In fact, the expense for these items and expenses the committee shared with our GPAC actually was greater than what was reimbursed to us. The portion that was reimbursed was on a dollar for dollar basis.

There was no excess amount which could be considered a donation by the committee.

I hope this sufficiently responds to your request. If further information is needed please contact myself or my accountant Roger Westbrook at the address below:

Gilbert T. Adams
County Chairman
Jefferson County Democratic Party
1855 Calder Ave.
Beaumont, Texas 77701
409-835-3000

Sincerely,

Gilbert T. Adams
Jefferson County Democratic Chairman

9/19/01



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Gilbert T. Adams, Jr., Treasurer
Jefferson County Democratic Party
1855 Calder Avenue
Beaumont, TX 77701

SEP 5 2001

Identification Number: C00253880

Reference: 30 Day Post-General Report (10/19/00-11/27/00)

Dear Mr. Adams:

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:

-Schedule A supporting Line 15 of your report discloses a payment(s) from a federal candidate committee(s) for goods and/or services provided by your committee. 11 CFR §100.7(a)(1)(iii)(A) states that "...the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution." Examples of goods and services include equipment, supplies, personnel, membership lists and mailing lists. The term "usual and normal charge" for goods is defined as "...the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution". The usual and normal charge for services is defined as "...the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the services were rendered." 11 CFR §100.7(a)(1)(iii)(B)

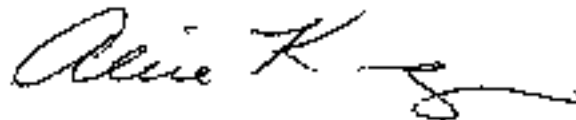
Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided to the federal candidate committee(s) and explain the steps your committee took in determining the amount(s) charged. If your committee provided the goods and/or services at less than the usual and normal charge, the difference between the two is considered to be an in-kind contribution by your committee to the federal candidate committee(s) and is subject to the limits set forth at 2 U.S.C. §441a. (11 CFR §100.7(a)(1)(iii)(A))

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to check the appropriate CATEGORY box for the payment(s) made to Mary Williams, Jacquelyn Savoy, and Jeffrey Globor. Please amend your report to disclose the appropriate category.

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

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,



Alice Kang
Reports Analyst
Report Analysis Division

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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