Democratic Senatorial Campaign Committee
430 South Capitol Street, S.E., Washington, D.C. 20003 • (202) 224-2447

April 5, 1994

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Ms. Robyn Jimeson
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Amended Year-End Report (12/1/93 - 12/31/93, dated 2/17/94)

Dear Ms. Jimeson:

This is in response to your letter requesting additional information concerning the above-referenced report filed by the Democratic Senatorial Campaign Committee.

You question the reporting of certain information on Schedule F of that report as expenditures under 2 U.S.C. S 441 a(d) (coordinated party expenditures). These expenditures were properly reported as S 441 a(d) expenditures.

The DSCC has been designated as the agent for S 441a(d) expenditures by both the State Party and the Democratic National Committee in each of the states in question. Each of the expenditures relates to the general election in the relevant states (opposition research and polling on the likely Republican nominee) and was undertaken for the benefit of the ultimate Democratic party nominee in those states. As the Commission has noted in Advisory Opinions 1984-15 and 1985-14, S 441(a(d) expenditures may lawfully be made before the date of a state's primary election and, therefore, before a nominee has been selected.

Because the expenditures by the Democratic Senatorial Campaign Committee were properly reported as S 441 a(d) expenditures, they are not considered to be contributions subject to the limits of 2 U.S.C. S 441a(h).

Very truly yours,

Donald J. Foley
Treasurer

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