FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

October 23, 1997

Elizabeth Birch, Treasurer
Human Rights Campaign Fund
Political Action Committee
1101 14th Street NW, Suite 200
Washington, DC 20005

Identification Number: C00235853

Reference: Amended February Monthly (1/1/97-1/31/97 dated 3/21/97), March Monthly (2/1/97-2/28/97), April Monthly (3/1/97-3/31/97), June Monthly (5/1/97-5/31/97) Reports

Dear Ms. Birch:

This letter is to inform you that as of October 22, 1997, the Commission has not received your response to our requests for additional information dated October 1, 1997. These notices request 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 these requests (copies enclosed).

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 J.P. Andre on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

OCT 1 1997

Elizabeth Birch, Treasurer
Human Rights Campaign Fund
Political Action Committee
1101 14th Street NW, Suite 200
Washington, DC 20005

Identification Number: C00235853

Reference: Amended February Monthly (1/1/97-1/31/97 dated 3/21/97), March Monthly (2/1/97-2/28/97) and April Monthly (3/1/97-3/31/97) Reports

Dear Ms. Birch:

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 E, supporting Line 24 for Independent Expenditures discloses $14,232.32 in disbursements (pertinent portion(s) attached). An independent expenditure is defined as a communication which expressly advocates the election or defeat of a clearly identified candidate. However, the purposes of expenditure disclosed on Schedule E do not appear to meet the definition of an independent expenditure. The expenditures may be in-kind contributions, which are defined as goods, services, or property offered free or at less than the usual and normal charge. The term also includes payments made on behalf of, but not directly to, candidates and political committees. If these expenditures are in-kind contributions, they appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee from making a contribution to a candidate for federal office in excess of $5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of $5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best

interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the candidate(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.2(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

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,

J.P. Andre, Jr.
Reports Analyst
Reports Analysis Division

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97031921442

SCHEDULE E ITEMIZED INDEPENDENT EXPENDITURES

For Line Nos. 24

Name of Committee (in Full)
Human Rights Campaign
1101 14th Street, NW Suite 200

I.D. Number
C00235853

Full Name, Address, Zip Code of Each Payee	Purpose of Expenditure	Date	Amount	Name of Fed Cand supported or opposed & Office
Kamel Communications P.O. Box 1342 Buffalo NY 14240-1342	Utilities	1/17/97	$631.00	[illegible] HELMS, JESSE A U.S. Senate Support Oppose
[illegible] P.O. Box 31122 Tampa FL 33631-3122	Office Expense	1/7/97	$3,997.50	[illegible] HELMS, JESSE A U.S. Senate Support Oppose
[illegible] 1920 E. Hwy 54, 8720 Durham NC 27713	Rent	1/15/97	$557.21	[illegible] HELMS, JESSE A U.S. Senate Support Oppose
				Support Oppose
				Support Oppose
				Support Oppose
				Support Oppose
				Support Oppose
				Support Oppose

(a) SUBTOTAL of Itemized Independent Expenditures (this page) $5,086.20

(b) SUBTOTAL of Unitemized Independent Expenditures $ 0.00

(c) TOTAL Independent Expenditures $5,086.20

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me

this 20th day of March,

19 97

My Commission expires:

ROTUNDA D. MOBLEY
District of Columbia
My commission expires February 28, 2000

Signature

3/20/97
Date

NOTARY PUBLIC

97031920037

SCHEDULE E ITEMIZED INDEPENDENT EXPENDITURES

For Line Nos: 24

Name of Committee (in Full)
Human Rights Campaign
1101 14th Street, NW Suite 200

I.D. Number
C00235853

Full Name, Address, Zip Code of Bank Payee	Purpose of Expenditure	Date	Amount	Name of Fed Cand supported or opposed & Office
Bell Communications P.O. Box 1342 Buffalo NY 14240-1342	Utilities	2/11/97	$2,349.16	2000001S HELMS, JESSE A U.S. Senate Support Oppose
Heather Bell 3562 Vine Maple Eugene OR 97401	Overhead Office Supplies	2/28/97	$189.00	2000001S HELMS, JESSE A U.S. Senate Support Oppose
Martina Cole 1201 Third Avenue, 40th Flr. Seattle WA 98101-3099	Consulting fee	2/27/97	$185.00	2000001S HELMS, JESSE A U.S. Senate Support Oppose
Fieldwork Communications 10271 Green Holly Terrace Silver Spring MD 20903	Consulting fee	2/11/97	$8,484.00	2000001S HELMS, JESSE A U.S. Senate Support Oppose
				Support Oppose
				Support Oppose
				Support Oppose
				Support Oppose
				Support Oppose

(a) SUBTOTAL of Itemized Independent Expenditures (this page)	$8,130.16	
(b) SUBTOTAL of Unitemized Independent Expenditures	$ 0.00	
(c) TOTAL Independent Expenditures		$8,130.16

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Signature 3/20/97 Date

Subscribed and sworn to before me
this 20th day of March
19 97

My Commission expires:

PROTUNDA D. MOORLEY
District of Columbia
My commission expires February 28, 2000

NOTARY PUBLIC

#7031972286

SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Page 1 of 1 Pages

Name of Committee (in Full) Human Rights Campaign

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate Supported or Opposed by the expenditure & office sought
Mitch Forshee 6123 Farrington Rd Apt 3-15 Chapel Hill, NC 27514	Office Expenses	3-20-97	$610.56	SPECIALIST Helms, Jesse A ☐ Support ☒ Oppose
Mitch Forshee 6123 Farrington Rd Apt 5-15 Chapel Hill, NC 27514	Office Expenses	3-18-97	$405.40	SPECIALIST Helms, Jesse A ☐ Support ☒ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures ..... $ 5,015.96

(b) SUBTOTAL of Unitemized Independent Expenditures ..... $ 0.00

(c) TOTAL Independent Expenditures ..... $ 6,015.96

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, consent with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing, dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Signature 4/18/97 Date

Subscribed and sworn to before me this 18th day of April

My Commission expires:

NOTARY PUBLIC

ROTUNDA D. MOBLEY
District of Columbia
My commission expires February 28, 2000