



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

DEC 10 1997

Craig M. Bradley, Treasurer  
Massachusetts Democratic State  
Committee Federal Funds  
129 Portland Street  
Boston, MA 02114

Identification Number: C00089243

Reference: Mid-Year Report (1/1/97-6/30/97)

Dear Mr. Bradley:

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 calculations for Line 31, Columns A and B appear to be incorrect. FEC calculations disclose this amount(s) to be \$316,661.67. Please provide the corrected total(s) on the Detailed Summary Page.

-Please provide a Schedule B to support the entry reported on Line 22 of the Detailed Summary Page. Each transfer-out to an affiliated committee must be itemized on Schedule B regardless of the amount transferred. 2 U.S.C. §434(b)(6)(B)(i)

-Your report discloses receipts totalling \$1,126.83 from ASDC Corporation Dollars for Democrats, which is a joint fundraising committee(s) affiliated with your committee. Please be advised that a memo Schedule A must be provided to itemize your committee's share of the gross contributions received through the joint fundraiser(s). The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the calendar year, and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount. 11 CFR §102.17(c)(8)(i)(B)

-Schedule D of your report has failed to include certain information. Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and end of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report by providing the purpose for the debt owed by Early for Congress Committee and for the debt owed to MDP-DNC transfer Account. 11 CFR §104.11

-Schedule H3 of your report discloses transfers-in from "DNC Transfer Account" to pay for the Administrative/Voter Drive expenses of your committee. 11 CFR §106.5(g)(1)(i) permits a committee to "pay the entire amount of an allocable expense from its federal account and shall transfer from its non-federal account to its federal account solely to cover the non-federal share of that allocable expense" (emphasis added). Please verify that "DNC Transfer Account" is a non-federal account maintained by your committee.

-Your Administrative/Voter Drive EVENT YEAR-TO-DATE total calculations appear to be incorrect. Schedule H4 of your report discloses the ending event year-to-date total to be \$494,774.83, however, FEC calculations disclose this amount to be \$485,526.43. Please clarify this discrepancy and note that changes in your figures may affect this total on subsequent reports.

-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 date, amount, and purpose of such payments as required by 11 CFR §104.9(b).

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

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have not included the full name and/or mailing address for the vendor(s) listed on pages 32, 33, 38, 39, 41, 46 and 65. Please amend your report accordingly.

-Please be advised that the ballot composition ratio for allocation of administrative and generic voter drive expenses should be the same for state party committees in the same state. Schedule H1 of your report discloses the federal portion of administrative and generic voter drive expenses to be 14%. The federal portion is calculated by checking all the offices that will appear on the next general election ballot and dividing the points for federal offices by the total points for all offices. Please verify that your Schedule H1 adequately reflects what will appear on the next general election ballot. If necessary, please amend your report to include a corrected H1.

-Schedule A of your report (pertinent portion(s) attached) discloses contribution(s) which may have been drawn on a corporate account(s). 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from separate segregated funds established by the corporations.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have received a contribution(s) from a corporation(s), you must transfer-out the impermissible funds to an account not used to influence federal elections or refund the full amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of the committee, all transfers-out and refunds should be made within thirty days of the treasurer's receipt of the impermissible funds. In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action on your part to transfer-out or refund any such prohibited contributions will be taken into consideration.

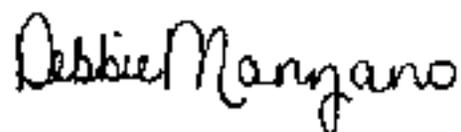
-Schedule H4 of your report discloses activity which is 100% federal. For future reporting, please be advised that any activity which is financed entirely by the federal account (including administrative expenses), should be reported on Schedule B supporting Line 21(b). 11 CFR §106.5

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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,



Debbie Manzano  
Senior Reports Analyst  
Reports Analysis Division

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## FEC - SCHEDULE A

## ITEMIZED RECEIPTS

Report Date: 7/7/97

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Contributions from Individuals/Persons Other than Political Committees

For Line Number: 11(a) (1)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)		Massachusetts Democratic Party		C00089243	
<b>A. Full Name, Mailing Address and ZIP Code</b>					
Daniel L. Ocasio 230 West Canton Street Boston, MA 02116		Name of Employer Urban Access		Date (month, day, year)	Amount of Each Receipt this Period
				6/11/97 0	\$40.00
				5/19/97 0	\$150.00
				4/3/97 0	\$40.00
Receipt For: Primary General		Occupation			
X Other: Federal Account		President			
		Aggregate YTD		210.00	
<b>B. Full Name, Mailing Address and ZIP Code</b>					
Gilbert C Oliveira Oliveira Insurance Agency 1320 North Main Street Fall River, MA 02720		Name of Employer Oliveira Insurance Agency		Date (month, day, year)	Amount of Each Receipt this Period
				5/12/97	\$500.00
Receipt For: Primary General		Occupation			
X Other: Federal Account		President			
		Aggregate YTD		500.00	
<b>C. Full Name, Mailing Address and ZIP Code</b>					
Allyne Leary Pecovich 165 Falconer Avenue Brockton, MA 02401		Name of Employer Mass. Commission of Education		Date (month, day, year)	Amount of Each Receipt this Period
				6/10/97 0	\$55.00
				5/19/97 0	\$150.00
Receipt For: Primary General		Occupation			
X Other: Federal Account		Administrator			
		Aggregate YTD		205.00	
<b>D. Full Name, Mailing Address and ZIP Code</b>					
Paul M Perzella 15 Shamrock Street Worcester, MA 01605		Name of Employer Delaney & Associates		Date (month, day, year)	Amount of Each Receipt this Period
				6/10/97 0	\$55.00
				5/19/97 0	\$150.00
Receipt For: Primary General		Occupation			
X Other: Federal Account		Consultant			
		Aggregate YTD		205.00	
<b>E. Full Name, Mailing Address and ZIP Code</b>					
Michael J. Pise 33 Bonnerville Avenue Chicopee, MA 01013		Name of Employer Mass. Mutual Insurance		Date (month, day, year)	Amount of Each Receipt this Period
				3/21/97 0	\$40.00
				3/21/97 0	\$50.00
				3/25/97 0	\$160.00
Receipt For: Primary General		Occupation			
X Other: Federal Account		Attorney			
		Aggregate YTD		250.00	
<b>F. Full Name, Mailing Address and ZIP Code</b>					
Gail Foulton 16 Berkeley Drive Chatham, MA 01824		Name of Employer Shutesheen Valley Techn. School		Date (month, day, year)	Amount of Each Receipt this Period
				3/19/97 0	\$40.00
				3/19/97 0	\$40.00
				3/19/97 0	\$20.00
				3/19/97 0	\$40.00
				3/19/97 0	\$160.00
Receipt For: Primary General		Occupation			
X Other: Federal Account		Teacher			
		Aggregate YTD		300.00	
SUBTOTAL of Receipts This Page (optional)					\$1,690.00
TOTAL This Period (last page this line number only)					See Last Page

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