



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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Gary Paul, Treasurer
Democratic State Central Committee
of California-Federal
911 20th Street, Suite 100
Sacramento, CA 95814

MAR 29 1995

Identification Number: C00105668

Reference: 30 Day Post-General Report (10/20/94-11/28/94)

Dear Mr. Paul:

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:

-The beginning cash balance of this report should equal the ending balance of your Amended 12 Day Pre-General report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Please provide a Schedule C or D, as appropriate, to support the entry of \$754,665.69 reported on Line 10 of the Summary Page. Loans and debts must be continuously reported until they are either repaid or settled. 11 CFR §104.3(d)

-Please provide a Schedule F to support the entry reported on Line 25 of the Detailed Summary Page. Any coordinated expenditure made by a national, state or designated party committee must be itemized on Schedule F, regardless of the amount expended. 11 CFR §104.3(b)(3)(viii) and 2 U.S.C. §434(b)(5)(D)

-Schedule H4 discloses a disbursement(s) which is categorized as a fundraising expense(s); however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the direct costs of each fundraising event in which the committee collects both 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 event(s) named Unity Dinner '94-LA.

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-On Schedule H2, you disclose the ratios for Women with Strong Voices, Malcolm Rally-SF, House Parties, Feinstein State Mailer and Women Voter's Mailing to be new, and the ratio for General Fundraising/non-events to be revised. However, Schedule H2 of your previous reports disclosed ratios for these activities/events which are identical to those given in this report. Please amend your report to clarify these discrepancies. 11 CFR §104.10(a)(1)

-Schedule H4 of your report (pages 46, 146, 257 and 258), discloses what appears to be payments to vendors for either in-kind contributions or coordinated party expenditures to federal candidates. However, the federal candidates are not disclosed as memo entries on Schedule B for Line 23 or Schedule F for Line 25 as indicated on Schedule H4. Please amend your report to clarify these discrepancies.

-Please clarify the expenditure made to Black American Political Assoc. of Ca Inc. for radio ad on page 28 of Schedule H4. If a portion or all of this expenditure was made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or F supporting Line 23 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

-The totals listed on Lines 6(c) and 7, Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals.

-Your calculations for Line 6(d), Column A appear to be incorrect. FEC calculations disclose this amount to be \$1,689,397.29. Please provide the corrected total on the Summary Page.

-The totals listed on Lines 11(a)(i), 11(a)(ii), 11(a)(iii), 11(c), 11(d), 12, 15, 19, 20, 21(a)(i), 21(a)(ii), 21(b), 21(c), 25, 30 and 31, Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals.

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

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letter. If you need assistance, please feel free to contact us on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Debbie Manzano

Debbie Manzano
Reports Analyst
Reports Analysis Division

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