

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

June 10, 2014

ROBERT BAKER, TREASURER LEAGUE OF YOUNG VOTERS PAC 33 WEST 19TH ST. 328 NEW YORK, NY 10011

Response Due Date 07/15/2014

IDENTIFICATION NUMBER: C00404574

REFERENCE: YEAR-END REPORT (10/01/2013 - 12/31/2013)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following <u>3</u> item(s):

1. The beginning cash balance of this report does not equal the ending balance of your Mid-Year Report (1/1/13-6/30/13). Please correct this discrepancy and amend all subsequent report(s) that may be affected by the correction. (2 U.S.C. § 434)(b)(1))

2. The totals listed on Lines 6(c), 11(a)(i), 11(a)(ii), 11(a)(iii), 11(d), 19, and 20, Column B of the Summary and Detailed Summary Pages appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (2 U.S.C. § 434(b))

3. Schedule D supporting Line 10 of your report discloses debts owed by your committee to "LEAGUE OF YOUNG VOTERS PAC" with negative opening and closing balances. You are advised that any debt(s) with a negative opening or closing balance requires further clarification. A negative balance suggests that you have either made a mathematical error or overpaid the debt which would result in the vendor incurring a debt owed to your committee and should be reported on Schedule D supporting Line 9 of your report.

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Further, a credit from a vendor should be reported as a negative entry in the "amount incurred this period" field of the original debt and not as a separate debt transaction. In addition, credits from vendors require clarifying information to ensure that your committee did not receive a prohibited in-kind contribution per 11 CFR. §100.52 (d)(1). Please amend your report to clarify the nature of this transaction(s).

- Schedule H4 discloses activity which is paid for with 100% non-federal funds. For future filings, 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). Any activity which is 100% non-federal and permissibly financed entirely by the non-federal account, should not be disclosed on the FEC Form 3X (11 CFR §104.10)

For your information and consideration when preparing future filings, Separate Segregated Funds and Nonconnected committees that have established a federal account and a non-federal account may pay administrative expenses, costs for generic voter drives and expenses related to public communications referencing any political party from their federal account, or allocate between their federal and non-federal accounts. Committees that choose to allocate these expenses must disclose the allocation ratio to be applied to each category of activity on a Schedule H1.

Schedule H2 is used by all political committees to report the allocation ratios of their joint federal and non-federal fundraising events and direct candidate support programs. Schedule H2 is filed with each report that discloses a disbursement for allocated activity. Schedule H3 is used by all political committees to report transfers received by the federal account from the non-federal account(s) to pay the non-federal share of allocable expenses.

Any expenditures made on behalf of both federal and non-federal candidates (including in-kind contributions and independent expenditures) must be allocated between your committee's federal and non-federal accounts. Schedule H4 is used by all political committees to report payments for allocable expenses. (11 CFR §106.1(a))

For your next filing, please refer to the instructions for each line and schedule when determining the proper categorization(s).

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due

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date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered**.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1175.

Sincerely,

Sarah guris

Sarah Juris Campaign Finance Analyst Reports Analysis Division

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