



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

January 28, 2000

Collin C. Peterson, Treasurer
Blue Dog Political Action Committee
P.O. Box 7668
Washington, DC 20044

Identification Number: C00305318

Reference: April Monthly (3/1/99-3/31/99), May Monthly (4/1/99-4/30/99), July Monthly (6/1/99-6/30/99), August Monthly (7/1/99-7/31/99) and October Monthly (9/1/99-9/30/99) Reports

Dear Mr. Peterson:

On January 5, 2000, you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your January 14, 2000 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

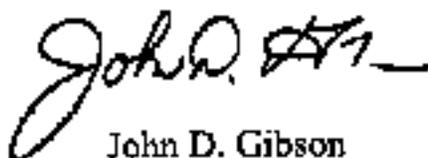
-In your response you indicate that "accounting services provided by Deloitte & Touche, which are reported as an in-kind contribution from the Firm, covers administrative expenses for rent, utilities, salaries or supplies." In addition to the in-kind contribution itemized in your response, your 1999 June Monthly and 1999 October Monthly Reports itemize in-kind contributions from this entity. According to Advisory Opinion 1991-1, Deloitte & Touche is a general partnership providing comprehensive accounting and other professional services and is also a Federal contractor. Please note that in accordance with 11 CFR §115.4(a), the assets of a partnership which is a Federal contractor may not be used to make contributions or expenditures in connection with Federal elections; however, nothing in this section prohibits an employee of a partnership which is a Federal contractor from making contributions or expenditures from his or her personal assets. Since it appears that the general funds of Deloitte & Touche were used to pay the administrative expenses of the committee, the in-kind contributions would

result in apparent prohibited contributions. If this is the case, you should refund the full amount of the in-kind contributions from Deloitte & Touche and itemize the refunds on Schedule B, supporting Line 28(a), or itemize the outstanding prohibited contributions as debts on Schedule D, supporting Line 10, until such time as the debts are extinguished. Please clarify any corrective action taken and amend your report(s) accordingly.

If this information is not received by the Commission 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 related to this matter, please contact Kenneth Davis on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Gibson". The signature is written in a cursive style with a long horizontal flourish extending to the right.

John D. Gibson
Assistant Staff Director
Reports Analysis Division

