



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Charleta B. Tavares, Treasurer
Ohio Democratic Party
Federal Campaign Account
37 W. Broad Street, Suite 430
Columbus, OH 43215

SEP 24 1997

Identification Number: C00016899

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

Dear Ms. Tavares:

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 H2 of your report indicates that your committee participated in State Ballot exempt activities or events during the reporting period. However, there are no corresponding disbursements reflected on your Schedule H4. If any disbursements were incorrectly reported, you should file an amended Schedule H4 with the correct unique identifying code or title.

Note that you need not include activities on Schedule H2 if there are no corresponding payments made for the activity during the reporting period.

-Schedule H2 indicates the allocation ratio for IN97 was revised during the reporting period. Please provide the date on which this revision became effective. In the event that an excessive non-federal transfer was received, the excessive amount should be transferred back to your non-federal account.

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-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).

-Schedule H4 supporting Line 21(a) (pertinent portion(s) attached) discloses \$59,623.90 in disbursements to the Ohio Democratic Committee for 100% federal administrative and exempt activity. You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information regarding these transactions including the date(s) when the original activity was conducted by the non-federal account. In addition, if any of the disbursements disclosed on Schedule H4 supporting Line 21(a) were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in-kind contributions on Schedule H4 supporting Line 23, or as coordinated expenditures on Schedule F supporting Line 25. 11 CFR §§104.3(b)(3) and 106.1

Although the Commission may initiate legal action regarding the activities conducted by your non-federal account, any clarifying information that you can provide will be taken into consideration.

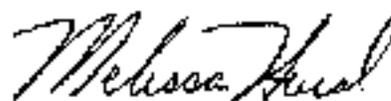
-Schedule A supporting Line 12 discloses a transfer-in from the Democratic State Party Victory Fund. Schedule H4 supporting Line 21(a) reflects payments for an exempt handout. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used including distribution by direct mail; all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR 100.7(b)(15) and (17) and to the Campaign Guide for Party Committees.

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Please clarify the nature of the transfers-in and subsequent payments for all exempt activities. If the activity disclosed on your report does not meet the definition of "exempt" activity as described above and if any portion of the expenditures were made on behalf of specifically identified candidates, that amount must be disclosed on Schedule B or F supporting Line 23 or 25 of the Detailed Summary Page as appropriate.

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,



Melissa Hurd
Reports Analyst
Reports Analysis Division

DISBURSEMENT SCHEDULE H4

JOINT FEDERAL/NON-FEDERAL
ACTIVITY SCHEDULE

NAME OF COMMITTEE (in Full) Ohio Democratic Party C00016899

Full Name, Mailing Address and Zip Code	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Ameritech P O Box 84000 Columbus, OH 43284-0001	Admin/phone service	01/10/1997			

CATEGORY: ADMINISTRATIVE/VOTER DRIVE FUNDRAISING EXEMPT
 EVENT YEAR-TO-DATE: \$ 49,123.52 DIRECT CANDIDATE SUPPORT

Full Name, Mailing Address and Zip Code	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Boxmaster 3731 E Broad St Columbus, OH 43213	Office Supplies	01/10/1997			

CATEGORY: ADMINISTRATIVE/VOTER DRIVE FUNDRAISING EXEMPT
 EVENT YEAR-TO-DATE: \$ 49,274.74 DIRECT CANDIDATE SUPPORT

Full Name, Mailing Address and Zip Code	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Hyatt Regency Columbus 350 N High St Columbus, OH 43215	Meeting	01/10/1997			

CATEGORY: ADMINISTRATIVE/VOTER DRIVE FUNDRAISING EXEMPT
 EVENT YEAR-TO-DATE: \$ 49,573.43 DIRECT CANDIDATE SUPPORT

Full Name, Mailing Address and Zip Code	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Ohio Democratic 37 W Broad St Columbus, OH 43215	State Ballot/expense	01/13/1997			

CATEGORY: ADMINISTRATIVE/VOTER DRIVE FUNDRAISING EXEMPT
 EVENT YEAR-TO-DATE: \$ 32,153.97 DIRECT CANDIDATE SUPPORT

Full Name, Mailing Address and Zip Code	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Spectrafax 3050 N Horseshoe Dr, Ste Naples, FL 34104-7908	Broadcast Fax	01/14/1997			

CATEGORY: ADMINISTRATIVE/VOTER DRIVE FUNDRAISING EXEMPT
 EVENT YEAR-TO-DATE: \$ 49,723.29 DIRECT CANDIDATE SUPPORT

Full Name, Mailing Address and Zip Code	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Kinko's P O Box 105522 Atlanta, GA 30348-5522	Printing	01/14/1997			

CATEGORY: ADMINISTRATIVE/VOTER DRIVE FUNDRAISING EXEMPT
 EVENT YEAR-TO-DATE: \$ 49,869.62 DIRECT CANDIDATE SUPPORT

SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE \$ 33,594.61 32,470.91 1,123.70

TOTAL THIS PERIOD (last page for each line only) (Fed. share to 21 a 1 and non-Fed. share to 21 a 2) _____

TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for line 31 of the detailed summary page) _____

DISBURSEMENT SCHEDULE H4

JOINT FEDERAL/NON-FEDERAL
ACTIVITY SCHEDULE

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FOR LINE 21a	

NAME OF COMMITTEE (In FIM)
Ohio Democratic Party

C00016899

Full Name, Mailing Address and Zip Code	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Ohio Democratic 37 W Broad St Columbus, OH 43215	transfer Rebate	06/17/1997	27,470.00	27,470.00	0.00
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 366,391.68 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
American Business Credit P O Box 41647 Philadelphia, PA	Copier Lease	06/17/1997	613.57	134.99	478.58
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 367,005.25 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
Media Group 1480 Dublin Rd Columbus, OH 43215	Sd97/staging	06/18/1997	20,104.35	10,052.18	10,052.17
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 95,162.49 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
Merchant Credit Systems 7540 Sharrington Dr Columbus, OH 43235-1830	Bank Charge	06/19/1997	31.60	6.95	24.65
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 367,036.85 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
Derrick Clay 5246 North Town Blvd Apt A Columbus, OH 43229	Salary	06/20/1997	924.30	203.35	720.95
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 367,961.15 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
William P Demore 61 E Russell Columbus, OH 43215	Salary	06/20/1997	366.52	80.63	285.89
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 368,327.67 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE			\$ 49,510.34	37,948.10	11,562.24
TOTAL THIS PERIOD (see page for each line only) (Fed. share in 21 a i and non-Fed. share in 21 a ii)					
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for line 31 of the detailed summary page)					

