



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Jeff Clark, Treasurer  
Tennessee Democratic Party  
1808 West End Avenue #515  
Nashville, TN 37203

SEP 25 1996

Identification Number: C00167346

Reference: July Quarterly Report (4/1/96-6/30/96)

Dear Mr. Clark:

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:

-Please clarify all expenditures made for media on Schedule H4. If a portion or all of these expenditures were 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)

-Please provide a Schedule H3 to support the entry reported on Line 18 of the Detailed Summary Page. All transfers received from a committee's non-federal account for joint activity must be itemized on Schedule H3 regardless of the amount transferred. 2 U.S.C. §434(b)(3)(D)

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct Administrative/Voter Drive EVENT YEAR-TO-DATE totals.

-The totals listed on Lines 21(a)(i), 21(a)(ii), 21(c), 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. Please amend your report and any subsequent reports that may be affected by this correction.

-Schedule B supporting Line 22 (pertinent portion(s) attached) discloses \$3,836 in disbursements to Tennessee Demo. Exec. Comm. for Transfer/Repay State Share. 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 B supporting Line 22 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 B 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 B supporting Line 22 discloses transfers to your non-federal account for "transfer/correct erroneous dep" (pertinent portion attached). Please provide the original date of receipt of these funds. In addition, you must amend the report covering the period during which the funds were received to disclose the receipt on Schedule A supporting the appropriate line of the Detailed Summary Page. 11 CFR § 103.3(b)(1)

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,

  
Andrew J. Dodson  
Senior Reports Analyst  
Reports Analysis Division

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Statement Page

PAGE **1** OF **1**  
FOR LINE NUMBER **22**

Any information copied from these 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)

Tennessee Democratic Party

C00167346

*ADD*

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month day, year)	Amount of Each Disbursement This Period
TENNESSEE DEMO. EXEC. COMM. 1808 WEST END AVENUE, ST. 515 NASHVILLE, TN 37203	TRANSFER/REPAY STATE SHARE Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify)	04/15/96	1,602.10
TENNESSEE DEMO. EXEC. COMM. 1808 WEST END AVENUE, STE. 515 NASHVILLE, TENNESSEE 37203	TRANSFER/CORRECT ERR. ALLOC. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify)	05/10/96	15,067.93 <i>ADD</i>
TENNESSEE DEMO. EXEC. COMM. 1808 WEST END AVENUE, STE. 515 NASHVILLE, TENNESSEE 37203	TRANSFER/REPAY STATE SHARE Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify)	05/22/96	2,234.52
TENNESSEE DEMO. EXEC. COMM. 1808 WEST END AVENUE, STE. 515 NASHVILLE, TENNESSEE 37203	TRANSFER/CORRECT ERRONEOUS DEP Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify)	06/26/96	30.00
TENNESSEE DEMO. EXEC. COMM. 1808 WEST END AVENUE, STE. 515 NASHVILLE, TENNESSEE 37203	TRANSFER/CORRECT ERRONEOUS DEP Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify)	06/26/96	429.80
TENNESSEE DEMO. EXEC. COMM. 1808 WEST END AVENUE, #515 NASHVILLE, TN 37203	TRANSFER/CORRECT ERR. ALLOCAT. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify)	06/28/96	363.85
TENNESSEE DEMO. EXEC. COMM. 1808 WEST END AVENUE, #515 NASHVILLE, TN 37203	TRANSFER/CORRECT ERR. ALLOCAT. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify)	06/28/96	33.41

SUBTOTAL of Disbursements This Page (optional)

19,761.61

TOTAL This Period (last page this line number only)

19,761.61

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