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2001 JUN -6 A 10 21

June 6, 2001

Attn: Angel L. Williamson, Reports Analyst
Reports Analysis Division
Federal Elections Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C00300921
Reference: 30 Day Post-General Report (10/19/00-11/27/00)

This memorandum is in response to your letter dated May 23, 2001 that was submitted due to concerns prompted by your review of the 30 Day Post-General Report (10/19/00-11/27/00):

Advertisement Expenditures

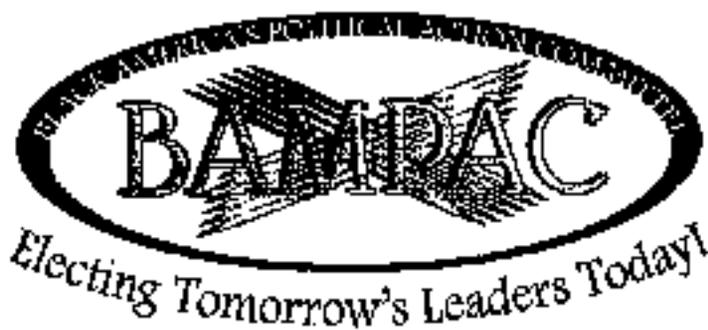
The advertisement expenditures reported on Schedule B of the 30 Day Post-General Report represent expenses incurred to fund an advertising campaign targeting African Americans. The purpose of this campaign was to present views on issues of importance to African Americans such as reforming the Social Security program and promoting our support for excellence in education. At no time were any of these advertisement expenditures made on behalf of federal or nonfederal candidates.

Independent Expenditure

An independent expenditure in the amount of \$5,000 in support of US Representative candidate Jennifer Carroll was paid to Targeted Creative Communications on 10/15/2000 as compensation for the production of a radio ad. This expenditure was reported on Schedule B- (page 1) as oppose to Schedule E of the 12 Day Pre-General Report. See attached report. Since this expenditure was paid on 10/15/2000, it was reported in the 12 Day Pre-General Report which covers the period of (10/1/2000-10/18/2000). Based on your inquiry, we have noted that this expenditure should have been reported on Schedule E of the 12 Day Pre-General Report as an independent expenditure.

Due to this reporting requirement, we have amended the 12 Day Pre-General Report to correctly reflect this independent expenditure on Schedule E of this report. We have also amended the 30 Day Post-General Report and the Year End Report to correctly state the "Calender Year-to-Date" totals for Schedules B and E. See attached amended reports.

Please note that we concluded that a 24 hour notice report was required to be filed with your agency because the radio ad was aired on 11/2/2000.



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"Best Efforts"

In response to your concerns regarding our "best efforts" to obtain the full name, mailing address, occupation and name of employer for contributors who exceed the \$200 threshold, the following procedures are performed:

• **Clear and Conspicuous Request**

All solicitations include an accurate and clear statement of the law's requirements for the collection and reporting of the above contributor information.

• **Follow-Up Requests Within 30 Days**

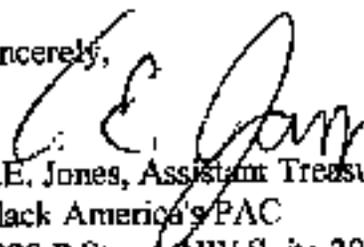
On a monthly basis, a report is generated that list all contributors who have contributed over \$200 at the completion of the month. This report is then reviewed and any contributors identified who did not provide the FEC required information are identified. A written follow-up request is then sent to the contributors who provided the incomplete information. Due to the recent increase in the number of contributors who cause this situation, we are currently exploring options to automate this process because the current process is quite manual. All follow-up requests to contributors of more than \$200 include the following wording:

"To comply with Federal law, we must use best efforts to obtain, maintain, and submit the name, mailing address, occupation, name of employer of individuals whose contributions exceed \$200 per calendar year."

Since we file on a quarterly basis (bi-annually in nonelection years), most of the information obtained from our follow-up requests is reported during the regularly scheduled report as oppose to requiring an alternate reporting mechanism. For information obtained from follow-up requests that are received subsequent to the related reporting date, our procedures are established to report this information in a memo schedule A with the next regularly scheduled report. We are currently refining our "Best Efforts" procedures for the 2001 reporting cycle in conjunction with implementing our electronic reporting process. We believe these procedures are in compliance with the "best efforts" standard.

If you require any further information, please contact me at (202) 785-9619 or write me at the address shown below.

Sincerely,


C.E. Jones, Assistant Treasurer
Black America's PAC
2029 P Street, NW Suite 202
Washington, DC 20036

SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information copied from such 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)
BLACK AMERICA'S PAC

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Starwood Urban Retail C/O Starwood Urban Dept. 1030 Los Angeles, CA 90088-1030	Office Rent Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/1/00	3,033.11
B. Full Name, Mailing Address and ZIP Code CareFirst-BlueCross/Blueshield PO Box 79749 Baltimore, MD 21279	Medical Insurance Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/10/00 1/0/00	1,058.00 0.00
C. Full Name, Mailing Address and ZIP Code District Cablevision 900 Michigan Ave NE Washington, DC 20017	Cable Service Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/12/00	62.70 0.00
D. Full Name, Mailing Address and ZIP Code Concentric Network 733 15th Street NW Washington, DC 20005	Website Support Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/15/00 1/0/00	199.00 0.00
E. Full Name, Mailing Address and ZIP Code Verizon PO Box 646 Baltimore, MD 21265-0646	Telephone service Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/4/00	468.02 0.00
F. Full Name, Mailing Address and ZIP Code AT&T 5500 Corporate Drive Pittsburgh, PA 15297	Telephone Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/10/00	27.58 0.00
G. Full Name, Mailing Address and ZIP Code Targeted Creative Communications 1800 Duke Street Alexandria, VA 22314-3512	Printing Expense Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/15/00	5,000.00 0.00
H. Full Name, Mailing Address and ZIP Code Professional Graphics Printing Co. 9550 Lynn Buff Court Laurel, MD 20723	Printing Expense Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/16/00	3,730.41 0.00
I. Full Name, Mailing Address and ZIP Code Haynes & Associates, Inc. 8300 Colesville Road Silver Spring, MD 20910	Financial Services Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/16/00	6,000.00

SUBTOTAL of Disbursements This Page (optional)	
TOTAL This Period (last page this line number only)	

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input checked="" type="checkbox"/> Hand Delivered	Date of Receipt <i>6-6-01</i>
<input type="checkbox"/> First Class Mail	POSTMARKED
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED (R/C)
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked _____ and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>PEI</i> PREPARER	<i>6-6-01</i> DATE PREPARED