



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Mr. Milieo DeJohn, Treasurer
16th Congressional District Democratic Party
950 Moran
Lincoln Park, MI 48146

MAR 13 2002

Identification Number: C00157404

Reference: Mid-Year Report (1/1/01-6/30/01)

Dear Mr. DeJohn:

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 B of your report discloses a transfer(s) to what appears to be a non-federal account of your committee. Please be advised that committees that make disbursements in connection with federal and non-federal elections and have established separate federal and non-federal accounts, must allocate their expenses pursuant to 11 CFR §§106.5 and 106.6. Please provide further clarification regarding this transfer(s). The Commission recommends that you take steps to correct any non-compliance, and that you establish procedures to ensure future compliance with the allocation regulations.

-Schedule B of your report (pertinent portion(s) attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule(s) B supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during

each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

-A political committee that has established a federal account and a non-federal account must allocate between its federal and non-federal account all expenses for administrative costs, generic voter drives and fundraising programs or events. 11 CFR §106.6(b)(2)

Separate Segregated Funds and Nonconnected committees must report the estimated percentages of their direct federal and non-federal candidate support for a two-year election cycle by filing a Schedule H1. To calculate the allocation ratio for administrative and generic voter drive costs, nonconnected committees use the funds expended method. 11 CFR §106.6(c)(1)

Party committees must allocate any administrative expenses between the federal and non-federal accounts in proportion to the ballot composition method derived from FEC Schedule H1. 11 CFR §106.5

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 a shared 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.

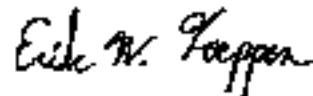
Any expenditures made on behalf of both federal and non-federal candidates (including in-kind contributions, independent expenditures and coordinated expenditures) must also be allocated between your committee's federal and non-federal accounts. Schedule H4 is used by all political committees to report payments for allocable expenses. 11 CFR §§106.1(a) and 106.5

Please clarify the procedures you are currently using to allocate shared activity. The Commission recommends that you take steps to correct any non-compliance with the regulations. Also, your committee should

establish procedures to ensure future compliance with the allocation regulations.

A 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. 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 need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Erik W. Koeppen
Reports Analyst
Reports Analysis Division

SCHEDULE B (FEC Form SX) ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Page	FOR LINE NUMBER (check only one)						PAGE 8/8
	<input type="checkbox"/> 21a	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 29	
	<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c		

Any information accepted from such reports and statements may not be valid 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)
RIVERVIEW DEMOCRATIC CLUB

EWK

A. Full Name (Last, First, Middle Initial)
JOHN D. DINGELL FOR CONGRESS

Mailing Address
6487 SCHAEFER
City DEARBORN State MI Zip Code 48126

Purpose of Disbursement
CONTRIBUTION

Candidate Name
JOHN D. DINGELL FOR CONGRESS

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) _____

State: MI District: 15

Date of Disbursement
03 / 06 / 2001

Amount of Each Disbursement this Period
1800.00

Transaction ID: SB23.4128

B. Full Name (Last, First, Middle Initial)
JOHN D. DINGELL FOR CONGRESS

Mailing Address
6487 SCHAEFER
City DEARBORN State MI Zip Code 48126

Purpose of Disbursement
CONTRIBUTION

Candidate Name
JOHN D. DINGELL FOR CONGRESS

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) _____

State: MI District: 15

Date of Disbursement
04 / 05 / 2001

Amount of Each Disbursement this Period
200.00

Transaction ID: SB23.4125

C. Full Name (Last, First, Middle Initial)
JOHN D. DINGELL FOR CONGRESS

Mailing Address
6487 SCHAEFER
City DEARBORN State MI Zip Code 48126

Purpose of Disbursement
CONTRIBUTION

Candidate Name
JOHN D. DINGELL FOR CONGRESS

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) _____

State: MI District: 15

Date of Disbursement
05 / 10 / 2001

Amount of Each Disbursement this Period
300.00

Transaction ID: SB23.4128

SUBTOTAL of Disbursements This Page (optional) 2000.00

TOTAL This Period (add page this line number only)

SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category at the
Detailed Summary Page

FOR LINE NUMBER:
(check the one)

PAGE 19/22

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25
<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 29b	<input type="checkbox"/> 29c

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)
18TH CONGRESSIONAL DISTRICT DEMOCRATIC PARTY

Full Name (Last, First, Middle Initial)
JOHN D. DINGELL FOR CONGRESS

Mailing Address
5457 SCHAEFER
City DEARBORN State MI Zip Code 48126

Purpose of Disbursement
CONTRIBUTION

Candidate Name
JOHN D. DINGELL FOR CONGRESS

Category/
Type

Office Sought: House
Senate
President
Disbursement For: Primary General
Other (specify)

State: MI District: 13

Date of Disbursement
09 / 30 / 2001

Amount of Each Disbursement this Period
300.00

Transaction ID: 8823.4189

Full Name (Last, First, Middle Initial)
JOHN D. DINGELL FOR CONGRESS

Mailing Address
5487 SCHAEFER
City DEARBORN State MI Zip Code 48126

Purpose of Disbursement
CONTRIBUTION

Candidate Name
JOHN D. DINGELL FOR CONGRESS

Category/
Type

Office Sought: House
Senate
President
Disbursement For: Primary General
Other (specify)

State: MI District: 13

Date of Disbursement
08 / 06 / 2001

Amount of Each Disbursement this Period
6000.00

Transaction ID: 8823.4181

Full Name (Last, First, Middle Initial)
MICHIGAN DEMOCRATIC STATE CENTRAL COMMITTEE/FED ACCT

Mailing Address
605 TOWNSEND
City LANSING State MI Zip Code 48953

Purpose of Disbursement
FUNDRAISING TICKETS

Candidate Name

Category/
Type

Office Sought: House
Senate
President
Disbursement For: Primary General
Other (specify)

State: District

Date of Disbursement
09 / 30 / 2001

Amount of Each Disbursement this Period
3000.00

Transaction ID: 8823.4187

SUBTOTAL of Disbursements This Page (optional) \$ 9300.00

TOTAL This Period (last page this line number only)

EWK

