



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 15, 2009

Mikhael Moore, Treasurer
Jewish Council for Education and Research
244 5th Avenue, Suite M250
New York, NY 10001

Response Due Date:
June 15, 2009

Identification Number: C00452847

Reference: Amended 30 Day Post-General Report (10/16/08 – 11/24/08), received
1/12/09

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 5 items:

1. Schedule B supporting Line 21(b) of your report discloses \$10,657.58 in activity identified as MEMO entries that do not appear to correspond with any itemized transaction(s). Please be advised, a memo entry is used to disclose additional information about an itemized transaction and the amount of a memo entry is not included in the total receipts or disbursements for the report. Please amend your report to provide clarifying information regarding this activity.
2. Your amended report discloses additional disbursements totaling \$11,378.20 on Line(s) 21(b) and 24 of the Detailed Summary Page that were not disclosed on your original report. Please provide clarifying information as to why this activity was not disclosed on your original report. 11 CFR §104.3
3. Schedule E of your report indicates that your committee may have failed to file one or more of the required 24 hour notices regarding "last minute" independent expenditures (see attached). A political committee must file a 24 hour report with the Federal Election Commission as specified in 11 CFR §104.4(c), within 24 hours of any independent expenditures of \$1,000 or more with respect to a given election, made between two and twenty

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days before an election. The notice must be received by the Commission by 11:59 p.m. on the day following the date on which independent expenditures that aggregate \$1,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. 11 CFR §104.3(b)

4. Your committee has filed a 24 hour notice for an independent expenditure supporting Barack Obama (see attached) which has not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on 24 hour notices must also be itemized on a corresponding Schedule E or MEMO Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend your report and any subsequent reports that may be affected by this correction.

5. Your report does not include a Schedule H1 to disclose the ratio for the allocation of certain costs. For State, District and Local party committees, Schedule H1 must be filed in the first report each calendar year that discloses an allocable disbursement and for Separate Segregated Funds and Non-connected committees, in each report that discloses an allocable disbursement for administrative expenses, generic voter drives or public communications that refer to any political party, but do not refer to any clearly identified candidates.

Further, for State, District and Local party committees, all shared administrative, generic voter drive and exempt activity costs incurred during the two-year cycle must be allocated according to the appropriate fixed ratio, unless the federal account elects to pay a higher percentage of its cost. For Separate Segregated Funds and Non-connected committees, administrative expenses, generic voter drive costs and expenses related to public communications referencing any political party committee (but no clearly identified candidates) must be allocated according to a 50% flat minimum federal percentage unless the federal account elects to pay a higher cost. 11 CFR §106.7(d)(2), (d)(3) and 11 CFR §§104.10(b)(1) and 106.6(c)

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Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

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 should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1159.

Sincerely,



Allen Norfleet
Campaign Finance Analyst
Reports Analysis Division

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Missing 24 Hour Notice

| Name of Payee | Date | Amount | Purpose | Candidate |
|---------------------|----------|------------|---------------|--------------|
| Detroit Jewish News | 10/23/08 | \$330.00 | Newspaper Ad | Barack Obama |
| Detroit Jewish News | 10/23/08 | \$4,290.00 | Advertisement | Barack Obama |
| Jewish Journal | 10/28/08 | \$773.15 | Advertisement | Barack Obama |
| Jewish Journal | 10/28/08 | \$911.80 | Advertisement | Barack Obama |

24 Hour Notice Missing on Schedule E

| Name of Payee | Date | Amount | Purpose | Candidate |
|------------------------|----------|------------|--------------|--------------|
| Detroit Jewish News | 10/17/08 | \$1,650.00 | Newspaper Ad | Barack Obama |
| Detroit Jewish News | 10/23/08 | \$825.00 | Newspaper Ad | Barack Obama |
| Detroit Jewish News | 10/23/08 | \$825.00 | Newspaper Ad | Barack Obama |
| St. Louis Jewish Light | 10/21/08 | \$4,324.00 | Advertising | Barack Obama |
| St. Louis Jewish Light | 10/22/08 | \$4,324.00 | Advertising | Barack Obama |

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