



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Mark Ingram, Treasurer
Independent Action, Inc.
645 Pennsylvania Ave. SE,
2nd Floor
Washington, DC 20003

APR 17 1996

Identification Number: C00139741

Reference: Amended Mid-Year Report (1/1/95-6/30/95) dated
10/25/95

Dear Mr. Ingram:

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:

-Your report contains information disclosed on Schedules H1 and H4. These schedules are used by committees which have separate federal and non-federal accounts to disclose the allocation of funds for expenditures between the two types of accounts. Your reports do not show payments from a non-federal account on a Schedule H3, as would be customary for committees who allocate between accounts. If your committee does not maintain a non-federal account, all disbursements should be disclosed on a Schedule E and no allocation schedules filed. Please clarify the procedures you are currently using to allocate shared expenses if any, and report future disbursements appropriately.

-You must make an attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may demonstrate "best efforts" to obtain the required information by providing the Commission with a description of its procedures for requesting the information and may also supply a copy of a solicitation; the committee must request the contributor information in initial solicitations; make follow-up

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requests (if necessary); report the information; and file amendments to disclose previously unreported information. Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make an additional written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle. Furthermore, if a committee receives contributor information after the contributions have been reported, it must submit, with its next report, an amended memo Schedule A listing all the contributions for which additional information was received or file, on or before the next reporting date, amendments to the previous reports on which the contributions were originally disclosed. See 11 CFR §104.3(a)(4)(i) and 11 CFR §104.7.

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,



Edward D. Ryan
Reports Analyst
Reports Analysis Division

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