



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

APR 22 1998

Charles A. Gueli, Treasurer  
Italian American Democratic Leadership  
Council  
1828 L Street NW, Suite 1010  
Washington, DC 20036

Identification Number: C00299396

Reference: Year End Report (7/1/97-12/31/97)

Dear Mr. Gueli:

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 amend your report by providing the address for each disbursement itemized on Schedule B supporting Line 21(b).

-Schedule H2 of your report indicates that your committee participated in fundraising ("Salute to the Italian American Democratic Members of Congress") activities or events during the reporting period. However, there are no corresponding disbursements reflected on your Schedule H4. If any disbursements were incorrectly reported, you should file an amended Schedule H4 with the correct unique identifying code or title.

Note that you need not include activities on Schedule H2 if there are no corresponding payments made for the activity during the reporting period.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include a unique identifying title or code for the payment(s) made to Jessica Gajarsa, Doug DeMack, Rosopepe and Spanos, Courty Flannigan, Insty Prints, Printing Solutions, Bice Restaurant, and Kelly Ann Gallogher. 11 CFR §104.10. Please amend this report to provide a unique identifying title or code for each entry omitting this information.

-Schedule H4 discloses disbursements for salaries, photos, phone, xerox, fax, delivery, data entry consulting, program printing, transportation, catering, consulting and envelope printing which are categorized as fundraising activities; however, Schedule H2 does not include the allocation ratios for this activity. Please amend Schedule H2 to disclose the omitted ratios.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the total EVENT YEAR-TO-DATE amount for a payment(s) to Jessica Gajarsa, Doug DeMack, Rosopepe and Spanos, Courty Flannigan, Insty Prints, Printing Solutions, Bice Restaurant, and Kelly Ann Gallogher. Please amend your report to include the missing EVENT YEAR-TO-DATE total(s).

-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 B or H4, supporting Line 21(a) or 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) 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.

ITALIAN AMERICAN DEMOCRATIC  
LEADERSHIP COUNCIL

PAGE 3

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) 694-1130.

Sincerely,



Andrea Wilkens  
Reports Analyst  
Reports Analysis Division

266

