



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

January 7, 2011

Ken Sagar, Treasurer
Iowa Democratic Party
5661 Fleur Drive
Des Moines, IA 50321

**Response Due Date:
February 11, 2011**

Identification Number: C00035600

Reference: October Monthly Report (9/1/10-9/30/10)

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 2 items:

1. Schedule A supporting Line 15 of your report discloses a payment(s) from a federal candidate committee(s) for goods and/or services provided by your committee. 11 CFR §100.52(d)(1) states that "...the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution." Examples of goods and services include equipment, supplies, personnel, membership lists and mailing lists. The term "usual and normal charge" for goods is defined as "...the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution". The usual and normal charge for services is defined as "...the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the services were rendered." 11 CFR §100.52(d)(2)

Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided to the federal candidate committee(s) and explain the steps your committee took in determining the amount(s) charged. If your committee provided the goods and/or services at less than the usual and normal charge, the difference between the two is considered to be an in-kind contribution by your committee to the federal

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candidate committee(s) and is subject to the limits set forth at 2 U.S.C. §441a. (11 CFR §100.52(d)(1))

2. The limitation on making coordinated party expenditures on behalf of a House candidate in the State of Iowa for the 2010 general election is \$43,500.00. Your reports, however, disclose coordinated party expenditures made on behalf of David Wayne Loeb sack – H6IA02146 totaling \$79,951.00 and Leonard L. Boswell – H6IA03144 totaling \$46,869.62 which appear to exceed the limitations under 2 U.S.C. §441a(d) (see attached).

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

If you have made an excessive coordinated party expenditure, you must notify the candidate and request a refund of the amount in excess of the limitation.

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund request sent to the candidate. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

Although the Commission may take further legal action concerning the excessive coordinated party expenditures, prompt action in obtaining a refund will be taken into consideration.

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

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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) 694-1144.

Sincerely,



Edward D. Ryan
Senior Campaign Finance Analyst
Reports Analysis Division

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| Recipient Name | Date | Amount | Election | Report |
|----------------|-----------|-------------|----------|----------------------|
| Dave Loehsack | 9/22/2010 | \$79,951.00 | G-2010 | 2010 October Monthly |

| Recipient Name | Date | Amount | Election | Report |
|-----------------|------------|------------|----------|------------------------|
| Leonard Boswell | 08/27/2010 | \$1,064.75 | G-2010 | 2010 September Monthly |
| Leonard Boswell | 08/27/2010 | \$804.87 | G-2010 | 2010 September Monthly |
| Leonard Boswell | 09/09/2010 | 45,000.00 | G-2010 | 2010 October Monthly |

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