



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

James J. Bonham, Treasurer
Democratic Congressional Campaign
Committee - Expenditures
430 South Capitol Street SE, 2nd Floor
Washington, DC 20003

JUN 19 2003

Identification Number: C00000935

Reference: Amended August Monthly (7/1/01-7/31/01) Received 3/25/03

Dear Mr. Bonham:

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 E discloses an independent expenditure(s) on behalf of a federal candidate(s) (pertinent portion(s) attached). Schedule F of your report discloses a coordinated expenditure(s) on behalf of the same candidate(s). Under 2 U.S.C. §431(17), an "independent expenditure" is defined as:

... an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate which is made without cooperation or consultation with any candidate, or any authorized committee or agent of such candidate, and which is not made in concert with, or at the request or suggestion of, any candidate, or any authorized committee or agent of such candidate.

The coordination involved in making coordinated expenditures for a candidate may preclude your committee from making an independent expenditure in support of the same candidate. Under 11 CFR §109.1(c), any expenditure which does not qualify as an independent expenditure is considered an in-kind contribution. Please amend your report to disclose the aforementioned transactions as in-kind contributions (Schedule B supporting Line 23 of the Detailed Summary Page), or provide additional clarifying information concerning the independent expenditure(s) made in

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support of Lucas Louise (House/VA/04).

If reclassification of the expenditure(s) as an in-kind contribution(s), results in an excessive contribution(s), the Commission recommends that you notify the recipient(s) and request a refund of the amount in excess. Please inform the Commission immediately in writing and provide a photocopy of your refund request(s) sent to the recipient(s). In addition, any refund should be disclosed on Schedule A supporting Line 16 of your next report.

-Please clarify whether the disbursements on Schedule B for line 23 are earmarked contributions. Pursuant to 11 CFR §110.6(c), the original contributor for earmarked contributions must be disclosed on Schedule B. Please refer to the attached portions of the Federal Election Commission Campaign Guide for further guidance on the reporting of earmarked contributions and amend your report accordingly.

-Schedule F of your report discloses coordinated expenditures made on behalf of candidates and indicates that your committee has been designated to make coordinated expenditures by the Democratic National Committee or State Democratic Party. If your committee has been designated to make such expenditures by a State Democratic Party committee, please provide the name of the designating committee. If your committee has not been designated to make coordinated expenditures, they must be considered as in-kind contributions to the candidate(s) and be subject to the limitations of 2 U.S.C. §441a. Please amend your report with clarifying information. 2 U.S.C. §441a(d)

-Please clarify all expenditures made for Media Services on Schedule(s) B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E, or F supporting Lines 23, 24, or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

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.

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

NAME OF COMMITTEE (In Full) NF #0	FEC IDENTIFICATION NUMBER C00000935
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Full Name (Last, First, Middle, Initial) of Payee Hall Anderson Communications Group Inc.	Purpose of Expenditure	Category/Type
Mailing Address 10 St. Patrick's Drive Suite 201	Name of Federal Candidate supported or opposed by expenditure: Lucas Louie <i>EDR</i>	
City: Waldorf State: MD Zip Code: 20603	Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential	
Date: 07 05 2009 Amount: 1175.00 Transaction ID: G24-13733	Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	State: VA District: 04
Full Name (Last, First, Middle, Initial) of Payee SHJ Media Highwood Group Communications	Purpose of Expenditure	Category/Type
Mailing Address The Highwood House Box 6734	Name of Federal Candidate supported or opposed by expenditure: Lucas Louie <i>EDR</i>	
City: Washington State: DC Zip Code: 20020	Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> Presidential	
Date: 07 17 2009 Amount: 39735.00 Transaction ID: G24-13734	Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	State: VA District: 04

(a) SUBTOTAL of Itemized Independent Expenditures	34910.00
(b) SUBTOTAL of Unitemized Independent Expenditures	0.00
(c) TOTAL Independent Expenditures	34910.00

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of transportation, distribution, or reproduction in whole or in part of any campaign materials prepared by the candidate, its campaign committee, or their agent.

Subscribed and sworn to before me this _____ day of _____, 2009.

My Commission expires: _____

Signature _____ Date _____

NOTARY PUBLIC

4. Reporting Conduit Activity

The conduit must comply with special reporting rules, which vary depending on whether the contribution was deposited in the conduit's bank account or was passed on directly to the campaign in the form of the original contributor's check, 110.6(c)(1)(v).

A registered nonconnected committee acting as a conduit must disclose its activity on its next regularly scheduled FEC report, 110.6(c)(1)(D).

Contributions Deposited in Committee's Account

Schedule A

If an earmarked contribution passes through a nonconnected committee's account, the committee reports the following information on Schedule A:

- The name and mailing address of each person making an earmarked contribution (including earmarked contributions of \$200 or less) (110.6(c)(1)(iv)(A));
- The occupation and employer of each individual making an earmarked contribution exceeding \$200 (110.6(c)(1)(iv)(A));
- The candidate designated by the contributor as the recipient of the contribution (110.6(c)(1)(iv)(B));
- The election for which the contribution was designated, if any (see 110.1(b)(3)(i));
- The amount of the earmarked contribution (110.6(c)(1)(iv)(B)); and
- The date the contribution was received by the conduit (110.6(c)(1)(iv)(C)).

Schedule B

Once the committee has forwarded the contribution to the candidate (after depositing it in its own account), the committee reports on Schedule B:

- The candidate designated by the contributor (110.6(c)(1)(iv)(A));
- The date the contribution was forwarded (110.6(c)(1)(iv)(C));
- The amount forwarded to the candidate (110.6(c)(1)(iv)(B));
- The election designated by the contributor, if any (see 110.1(b)(3)(i));
- The name of the contributor (110.6(c)(1)(iv)(A)).

earmarked CONTRIBUTIONS

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS		Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: PAGE 1 OF 1
Any information copied from such Reports and Statements may not be used by any person for the purpose of making contributions or for promotional activities, other than using the name and address of any political committee to solicit contributions to similar activities.			
NAME OF COMMITTEE OR PFI Civil Republic PAC			
101 Third Ave., 10th Floor, New York, NY 10022			
A. NAME OF CONTRIBUTOR James Galagher		Date of Receipt 06 18 2008	
12 Grand Street City: New York NY Zip Code: 10002		Amount of Cash Received (in Dollars) 500.00	
FEC ID number of association or federal political committee C		Earmarked for Jessica Walman, Seneca, NY.	
Name of Candidate Perfect Day Seafood		Occupation Vice President	
Residential Address New York, NY		Aggregate Year-to-Date 500.00	
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)			

SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS		Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: PAGE 7 OF 7
Any information copied from such Reports and Statements may not be used by any person for the purpose of making contributions or for promotional activities, other than using the name and address of any political committee to solicit contributions from such activities.			
NAME OF COMMITTEE OR PFI Civil Republic PAC			
101 Third Ave., 10th Floor, New York, NY 10022			
A. NAME OF CANDIDATE Jessica Walman for Seneca		Date of Disbursement 06 25 2008	
Mailing Address 16 Reservoir Avenue, Ltd. City: New York NY Zip Code: 10002		Amount of Cash Disbursed (in Dollars) 500.00	
Political or Organizational Committee Name Contributions		Earmarked by James Galagher and transmitted by contribution check.	
Candidate Name Jessica Walman		Occupation Vice President	
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)			

These reporting procedures apply when the committee deposits an earmarked contribution before transmitting the funds to the candidate for whom the contributor earmarked them. When the committee transmits the contributor's original check, the procedures are the same, but the dollar amounts are listed as memo entries.

- A notation that the contribution was forwarded in the form of a check drawn on the conduit's account (110.6(c)(1)(iv)(C)); and
- A statement indicating that the conduit's limit was also affected, if appropriate, (110.6(d)(2)).

Undeposited Contributions

If the committee forwards the contribution without depositing it first (i.e., in the form of the contributor's original check), the committee must itemize the same information listed above in memo entries on Schedules A and B. The entries should indicate that the contribution was passed on in the form of the contributor's original check and, if appropriate, should indicate that the conduit's limits for that candidate were affected.

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