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

Identification Number: C00000935

Reference: Amended October Monthly (9/1/01-9/30/01) Received 12/19/01

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

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.

-Schedule F of your report discloses a coordinated expenditure made directly to a candidate committee (pertinent portion(s) attached). Please be advised that a coordinated expenditure is to be made on behalf of a candidate for the General Election. The money cannot be contributed directly to the candidate committee. As such your expenditure appears to be a contribution to a federal candidate and is subject to the limits set forth in the Act. Please amend your report to clarify your expenditures and record them on the appropriate schedule supporting the correct line of the Detailed Summary Page.

-The coordinated expenditure schedule (Schedule F) should disclose the following information: the identification of the designating committee, the payee's name and address, the purpose of the expenditure, the identification of the candidate supported, the office sought, state and district (if applicable), the date and amount of the payment and the aggregate general election expenditure total for each candidate supported. Please amend Schedule F by providing the identification of the designating committee, the payee's name and address, and the aggregate general election expenditure total for each candidate supported. 2 U.S.C. §441a(d)

-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)

-11 CFR §104.10(a)(1) requires a unique identifying title or code for each shared program or activity conducted on behalf of federal and non-federal

candidates. On Schedule H2, you have failed to provide a unique identifying code for all fundraising events (see attachment(s)). Please amend all schedules where a unique title or code was not provided for an activity/event.

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.

Sincerely,

Edward D. Ryan

Edward D. Ryan
Campaign Finance Analyst
Reports Analysis Division

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SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

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FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full)
Democratic Congressional Campaign Committee - Expenditures

FEC IDENTIFICATION NUMBER
C00000935

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

City: Washington
State: DC
Zip Code: 20020

Name of Federal Candidate supported or opposed by expenditure:
Lucas Louise

202

Office Sought: X House / Senate / Presidential
State: VA District: 04

Check One: X Support / Oppose

Date: 09 27 2001

Amount: 25182.00

Transaction ID: G24-13842

(a) SUBTOTAL of Itemized Independent Expenditures ..... ▶ 25182.00

(b) SUBTOTAL of Unitemized Independent Expenditures ..... ▶ 0.00

(c) TOTAL Independent Expenditures ..... ▶ 25182.00

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 dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Signature

Date M M D D Y Y Y Y

Subscribed and sworn to before me this M M D D Y Y Y Y day of

My Commission expires: M M D D Y Y Y Y

NOTARY PUBLIC

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SCHEDULE F (FEC Form 3X)
ITEMIZED COORDINATED EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. §441a(d)) (To be used only by Political Committees in the General Election)

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FOR LINE 25 OF FORM 3X

NAME OF COMMITTEE (in Full)
Democratic Congressional Campaign Committee - Expenditures

Has your committee been designated to make coordinated expenditures by a political party committee?
YES X NO
If YES, name the designating committee:

Full Name of Subordinate Committee

Mailing Address

City State ZIP Code

Full Name (Last, First, Middle Initial) of Each Payee
Friends of Scott Conklin

Purpose of Expenditure
Compliance Services

IND Category/Type

Mailing Address
201 North Front Street

City: Philipsburg State: PA ZIP Code: 16866

Date: 09 09 2001

Name of Federal Candidate Supported: Conklin Scott
Office Sought: X House / Senate / Presidential
State: PA District: 09

Amount: 21.70

Aggregate General Election Expenditure for the Candidate ▶ 1221.70

Transaction ID: G25-13749

Full Name (Last, First, Middle Initial) of Each Payee
L. Louise Lucas for Congress

Purpose of Expenditure
Supplies

IND Category/Type

Mailing Address
P.O. Box 730

City: Portsmouth State: VA ZIP Code: 23705-0730

Date: 09 24 2001

Name of Federal Candidate Supported: Lucas Louise
Office Sought: X House / Senate / Presidential
State: VA District: 04

Amount: 300.49 402

Aggregate General Election Expenditure for this Candidate ▶ 64851.77

Transaction ID: G25-13825

Full Name (Last, First, Middle Initial) of Each Payee
L. Louise Lucas for Congress

Purpose of Expenditure
Travel

IND Category/Type

Mailing Address
P.O. Box 730

City: Portsmouth State: VA ZIP Code: 23705-0730

Date: 09 24 2001

Name of Federal Candidate Supported: Lucas Louise
Office Sought: X House / Senate / Presidential
State: VA District: 04

Amount: 409.54 402

Aggregate General Election Expenditure for this Candidate ▶ 64851.77

Transaction ID: G25-13826

SUBTOTAL of Expenditures This Page (optional) ▶ 731.73

TOTAL This Period (last page this line number only) ▶

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SCHEDULE F (FEC Form 3X)
ITEMIZED COORDINATED EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. §441a(d))

(To be used only by Political Committees in the General Election)

FOR LINE 28 OF FORM 3X

NAME OF COMMITTEE (In Full)
Democratic Congressional Campaign Committee - Expenditures

Has your committee been designated to make coordinated expenditures by a political party committee?
YES X NO
If YES, name the designating committee:

Full Name of Subordinate Committee

Mailing Address

City State ZIP Code

Full Name (Last, First, Middle Initial) of Each Payee
L. Louise Lucas for Congress

Purpose of Expenditure
Telephone Expenses

IND
Category/Type

Mailing Address
P.O. Box 730

City: Portsmouth State: VA ZIP Code: 23705-0730

Date: 09 / 24 / 2001

Name of Federal Candidate Supported: Lucas, Louise
Office Sought: X House / Senate / Presidential
State: VA District: 04

Amount: $32 532.47

Aggregate General Election Expenditure for this Candidate ▶ 64851.77

Transaction ID: G25-13527

Full Name (Last, First, Middle Initial) of Each Payee
L. Louise Lucas for Congress

Purpose of Expenditure
Travel

ORG
Category/Type

Mailing Address
P.O. Box 730

City: Portsmouth State: VA ZIP Code: 23705-0730

Date: 09 / 05 / 2001

Name of Federal Candidate Supported: Lucas, Louise
Office Sought: X House / Senate / Presidential
State: VA District: 04

Amount: $32 1559.80

Aggregate General Election Expenditure for this Candidate ▶ 64851.77

Transaction ID: G25-13898

SUBTOTAL of Expenditures This Page (optional) ▶ 2092.27

TOTAL This Period (last page this line number only) ▶ 2824.00

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SCHEDULE H2 (FEC Form 3X)
ALLOCATION RATIOS

NAME OF COMMITTEE (In Full)
Democratic Congressional Campaign Committee - Expenditures

ALLOCATION RATIOS FOR INDIVIDUAL FUND-RAISING EVENTS, EXEMPT ACTIVITIES, AND SHARED DIRECT CANDIDATE SUPPORT APPEARING ON THIS REPORT.

Methods of allocation :

I. **FUNDRAISING** activities are allocated using the 'funds received method' where the federal proportion of expenses must equal the federal proportion of monies raised.

II. **EXEMPT** activities are allocated using the 'time and space method' where the federal proportion of disbursements is based on the proportion of time or space devoted to federal candidates.

III. Shared **DIRECT CANDIDATE SUPPORT** activities are allocated according to benefit expected to be derived, where the federal proportion of disbursements is based on benefit derived by federal candidates from the activity.

NAME OF ACTIVITY OR EVENT	FEDERAL %	NON-FEDERAL %
Harriman Billable ACTIVITY IS: [X] Fundraising [ ] Exempt [ ] Direct Candidate Support CHECK IF THE RATIO IS: [ ] New [ ] Revised [X] Same as Previously Reported	30.00 %	70.00 % Transaction ID: H2-645
Speakers Trust ACTIVITY IS: [X] Fundraising [ ] Exempt [ ] Direct Candidate Support CHECK IF THE RATIO IS: [ ] New [ ] Revised [X] Same as Previously Reported	60.00 %	40.00 % Transaction ID: H2-646
Finance Clubs ACTIVITY IS: [X] Fundraising [ ] Exempt [ ] Direct Candidate Support CHECK IF THE RATIO IS: [ ] New [ ] Revised [X] Same as Previously Reported	45.00 %	55.00 % Transaction ID: H2-647
Speakers Trust ACTIVITY IS: [X] Fundraising [ ] Exempt [ ] Direct Candidate Support CHECK IF THE RATIO IS: [ ] New [ ] Revised [X] Same as Previously Reported	30.00 %	70.00 % Transaction ID: H2-648