



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Ralph Santora, Treasurer
Independent Action Inc.
1317 F Street, NW, #900
Washington, DC 20004

MAY 2 2001

Identification Number: C00139741

Reference: 30 Day Post-General Report (10/19/00-11/27/00)

Dear Mr. Santora:

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:

-Line 21(b) of the Detailed Summary Page discloses operating expenditures during the reporting period. Please amend your report to clarify whether this figure includes any disbursements to payees that aggregate greater than \$200 in the calendar year. If this is the case, itemize the expenditures on Schedule B. 11 CFR §104.3(b)(3)

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the

requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2))
The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in

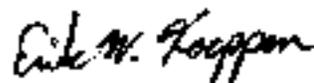
writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$20,795 in itemized contributions from individuals/persons other than political committees. The sum of the entries itemized on Schedule A, however, indicates the total to be \$20,095. Please amend your report to clarify the discrepancy.

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 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Erik W. Koeppen
Reports Analyst
Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

PAGE 1 of 1
LINE 23INDEPENDENT ACTION, INC. C00139741
For Period 10/19/00 to 11/27/00

NAME	PURPOSE	DATE	PAYMENTS THIS PERIOD
Kelleher for Congress 410 W Hovey Normal, IL 61761	Contribution IL-15, General House	11/03/00	2,000.00
<i>EWK</i> Baldwin for Congress 10 East Doty St Madison, WI 53703	Contribution WI-2, General House	10/23/00	5,000.00
Robb for Senate 424 C St. NE Washington, DC 20002	Contribution VA, General Senate	10/29/00 11/03/00	1,500.00 2,500.00
Schipske for Congress 3910 East 4th St Long Beach, CA 90814	Contribution CA-38, General House	11/03/00 11/03/00	1,500.00 3,500.00
Gash for Congress 1910 1st St Highland Park, IL 60035	Contribution IL-10, General House	11/03/00	1,000.00
Connelly for Congress 973 B Stuyvesant Ave Union, NJ 07083	Contribution NJ-17, General House	11/03/00	500.00
Matheson for Congress 677 S. 200 West Salt Lake City, UT 84101	Contribution UT-2, General House	11/03/00	1,000.00
Larsen for Congress 251 Colby Ave Everett, WA 98201	Contribution WA-2, General House	11/03/00	1,000.00
TOTAL THIS PERIOD			19,500.00 =====

SCHEDULE B

ITEMIZED DISBURSEMENTS

PAGE 1 of 1
LINE 23INDEPENDENT ACTION, INC. C00139741
For Period 1/1/99 to 6/30/99

NAME	PURPOSE	DATE	PAYMENTS THIS PERIOD
<i>EWA</i> Baldwin for Congress Box 696 Madison, WI 53701	Contribution WI-2, General	05/11/99	500.00
Gay and Lesbian Victory Fund 1012 14th St Washington, DC 20005	Contribution	01/05/99	80.00
TOTAL THIS PERIOD			580.00

