



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 26, 2010

Bill Combs, Treasurer
21st Century Democrats
1731 Connecticut Ave NW, 2nd Floor
Washington, DC 20009

**Response Due Date:
April 30, 2010**

Identification Number: C00230342

Reference: Amended December Monthly Report (11/1/09-11/30/09), received
3/10/10

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 4 items:

1. Your calculations for Line 8 appear to be incorrect. Cash-on-hand at the close of the current reporting period should always equal the closing calendar year-to-date cash-on-hand amount. Please provide the corrected total on the Summary Page.
2. The total listed on Lines 11(a)(i), Column B of the Detailed Summary Page(s) appears to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.
3. Your calculation for Line 11(a)(iii), Column B appears to be incorrect. FEC calculations disclose this amount(s) to be \$744,427.07. Please provide the corrected total(s) on the Detailed Summary Page.
4. Schedule A supporting Lines 15 and 17 of your report discloses payments from AMGlobal Consulting and Carol Enters List Company Inc. It appears these receipts were for goods and/or services provided by your committee. Pursuant to Advisory Opinion 1979-18, the sale/purchase price

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paid to a political committee could involve the receipt of a contribution from a purchaser if the purchase price exceeds the "usual and normal charge". 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. Examples of goods and services include equipment, supplies, personnel, advertising services, membership lists, and mailing lists. 11 CFR §100.52(d)(1) and (2)

Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided and explain the steps your committee took in determining the amount charged. If your committee provided the goods and/or services at more than the usual and normal charge, the difference between the two is considered to be an in-kind contribution received by your committee from a corporation and is prohibited subject to the limits set forth at 2 U.S.C. §441b(a)

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 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) 694-1394.

Sincerely,



Marlene R. Daughtrey
Senior Campaign Finance Analyst
Reports Analysis Division