



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

March 22, 2001

Ron L. Oliver, Treasurer
The Democratic Party of Arkansas
Federal Account
1300 West Capitol Avenue
Little Rock, AR 72201

Identification Number: C00024372

Reference: July Quarterly (4/1/00-6/30/00) and Amended July Quarterly (4/1/00-6/30/00), received 10/10/00 Reports

Dear Mr. Oliver:

This letter is to inform you that as of March 21, 2001, the Commission has not received your response to our request for additional information, dated February 28, 2001. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

An adequate response must be received at the Commission by April 11, 2001. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. 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.

If you should have any questions regarding this matter, please contact Nicholas Ebinger on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Ron L. Oliver, Treasurer
Democratic Party of Arkansas
1300 West Capitol Avenue
Little Rock, AR 72201

Identification Number: C00024372

FEB 28 2001

Reference: July Quarterly (4/1/00-6/30/00) and Amended July Quarterly (4/1/00-6/30/00), received 10/10/00 Reports

Dear Mr. Oliver:

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 A 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(f) and 11 CFR §110.1(d) preclude a committee and its affiliates from receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs should be derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category, not by state account number. Please amend your report by providing the correct Administrative/Voter Drive totals.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Refunds of contributions to individuals should be properly disclosed on a separate Schedule B, supporting Line 28(a) of the Detailed Summary Page. Note that this will change certain receipt and disbursement totals on the Detailed Summary Page. Please amend your report to correct these figures.

-Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$55,871 in itemized contributions from individuals. The sum of the entries itemized on Schedule A, however, indicates the total to be \$64,271. Please amend your report to clarify the discrepancy.

-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.

-Please clarify all expenditures made for "JJ Jackson Dinner", "media expense", "media" and "ad" on Schedule(s) H4. 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

-Schedule D supporting Line 10 of the Summary Page discloses debts owed to your non-federal account totaling \$15,044.67. 11 CFR §§106.5 and 106.6 requires that all shared expenses be paid from the federal account and

allows the non-federal account to transfer-in its share of the expense no more than 10 days before or 60 days after payment by the federal account.

The outstanding debt owed to your non-federal account must be paid immediately, as it represents a subsidization of federal activity by your non-federal account. Such activity is a violation of 11 CFR §102.5.

Although the Commission may take further legal steps concerning this prohibited activity, your prompt payment of the debt will be taken into consideration.

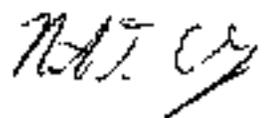
-Schedule H2 indicates the allocation ratio for JJ Jackson was revised during the reporting period. Please provide the date of the fundraising program or event. In the case of a telemarketing or direct mail campaign, the "date" is the last day of the telemarketing campaign, or the day on which the final direct mail solicitations are mailed. 11 CFR §106.5(f)(2) In the event that an excessive non-federal transfer was received, the excessive amount should be transferred back to your non-federal account.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): voter registration. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-On Schedule H3, you have failed to provide the NAME OF ACCOUNT for a transfer(s)-in. Please amend your report to identify the full name of the non-federal account from which each transfer-in is made. 11 CFR §104.10(a) and (b)

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,



Nicholas T. Ebinger
Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

3 9

FOR LINE NUMBER
11(a) (i)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Democratic Party of Arkansas

A. Full Name, Mailing Address and Zip Code Stephen Copley 16500 Chenal Prkwy, 8600 Little Rock, AR 72211- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer United Methodist Church	Date (month, day, year) 05/31/2000	Amount of Each Receipt this Period 85.00
	Occupation Minister	Aggregate Year-to-Date -> 425.00	
B. Full Name, Mailing Address and Zip Code Stephen Copley 16500 Chenal Prkwy, 8600 Little Rock, AR 72211- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer United Methodist Church	Date (month, day, year) 06/30/2000	Amount of Each Receipt this Period 85.00
	Occupation Minister	Aggregate Year-to-Date -> 510.00	
C. Full Name, Mailing Address and Zip Code Robert Cornelius P.O. Box 783 Crossett, AR 71635- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer <i>Requested</i>	Date (month, day, year) 04/04/2000	Amount of Each Receipt this Period 1,300.00
	Occupation	Aggregate Year-to-Date -> 1,300.00	
D. Full Name, Mailing Address and Zip Code Heather A. Daniel P. O. Box 4041 Fayetteville, AR 72702- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Fayetteville School	Date (month, day, year) 04/04/2000	Amount of Each Receipt this Period 1,300.00
	Occupation Teacher	Aggregate Year-to-Date -> 1,300.00	
E. Full Name, Mailing Address and Zip Code Heather A. Daniel P. O. Box 4041 Fayetteville, AR 72702- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Fayetteville School	Date (month, day, year) 05/02/2000	Amount of Each Receipt this Period 50.00
	Occupation Teacher	Aggregate Year-to-Date -> 1,350.00	
F. Full Name, Mailing Address and Zip Code Joy Drummonds 107 West Hanson Avenue Springdale, AR 72764- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer <i>Requested</i>	Date (month, day, year) 04/04/2000	Amount of Each Receipt this Period 1,300.00
	Occupation	Aggregate Year-to-Date -> 1,300.00	
G. Full Name, Mailing Address and Zip Code Dewayne Graham 111 Sugar Maple Dr. N Little Rock, AR 72120- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Self Employed	Date (month, day, year) 04/03/2000	Amount of Each Receipt this Period 5,300.00
	Occupation Congressional Candidate	Aggregate Year-to-Date -> 5,300.00	

NTE

SUBTOTAL of Receipts This Page (optional)

9,420.00

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category on the Detailed Summary Page

4 | 9
FOR LINE NUMBER
11(a)(i)

Any information copied from such reports and statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Democratic Party of Arkansas

A. Full Name, Mailing Address and Zip Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
James R. Hannah 2956 West Country Club Searcy, AR 72143- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	White County Occupation Chancery Judge	04/04/2000	8,300.00
Aggregate Year-to-Date ->		8,300.00	
James R. Hannah 2956 West Country Club Searcy, AR 72143- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	White County Occupation Chancery Judge	05/03/2000	100.00
Aggregate Year-to-Date ->		8,400.00	
Ann Harrison 5 W. Harrison West Fork, AR 72774- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Fayetteville School Occupation Teacher	04/04/2000	1,300.00
Aggregate Year-to-Date ->		1,300.00	
Robert L. Herzfeld 416 Jackson Benton, AR 72015- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Lovell, Nalles Occupation Attorney	05/09/2000	100.00
Aggregate Year-to-Date ->		100.00	
Robert L. Herzfeld 416 Jackson Benton, AR 72015- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Lovell, Nalles Occupation Attorney	06/20/2000	200.00
Aggregate Year-to-Date ->		300.00	
Victor L. Hill P. O. Box 149 Helena, AR 72342- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Crittenden County Occupation	04/12/2000	3,000.00
Aggregate Year-to-Date ->		3,000.00	
Edward B. Howell, Jr 711 E. Green Morriston, AR 72110- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>Requested</i> Occupation	04/12/2000	1,300.00
Aggregate Year-to-Date ->		1,300.00	

SUBTOTAL of Receipts This Page (optional)	14,300.00
TOTAL This Period (last page this line number only)	