



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

OCT 1 1997

Elizabeth Birch, Treasurer
Human Rights Campaign Fund
Political Action Committee
1101 14th Street NW, Suite 200
Washington, DC 20005

Identification Number: C00235853

Reference: Amended February Monthly (1/1/97-1/31/97 dated 3/21/97), March
Monthly (2/1/97-2/28/97) and April Monthly (3/1/97-3/31/97) Reports

Dear Ms. Birch:

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, supporting Line 24 for Independent Expenditures discloses \$14,232.32 in disbursements (pertinent portion(s) attached). An independent expenditure is defined as a communication which expressly advocates the election or defeat of a clearly identified candidate. However, the purposes of expenditure disclosed on Schedule E do not appear to meet the definition of an independent expenditure. The expenditures may be in-kind contributions, which are defined as goods, services, or property offered free or at less than the usual and normal charge. The term also includes payments made on behalf of, but not directly to, candidates and political committees. If these expenditures are in-kind contributions, they appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee 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