



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 24, 2011

THOMAS HAMILTON, TREASURER
MINNESOTA DEMOCRATIC-FARMER-LABOR
PARTY
255 PLATO BLVD E
ST PAUL, MN 55107

Response Due Date
06/28/2011

IDENTIFICATION NUMBER: C00025254

REFERENCE: YEAR-END REPORT (11/23/2010 - 12/31/2010)

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 6 item(s):

1. The totals listed on Lines 6(c), 7, 11(a)(i), 11(a)(ii), 11(a)(iii), 11(c), 11(d), 15, 18(a), 18(c), 19, 21(a)(i), 21(a)(ii), 21(c), 23, 31, and 32, Column B of the Summary and Detailed Summary Pages appear 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.
2. Schedule A of your 2010 reports combined discloses transfers totaling \$36,172.39 from "ASDC Partnership," which is a joint fundraising committee affiliated with your committee. Please be advised that a memo Schedule A must be provided to itemize your committee's share of the gross contributions received through the joint fundraiser(s). The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the calendar year, and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount. Please amend your report by providing the omitted memo schedule(s). 11 CFR §102.17(c)(8)(i)(B)
3. Schedule A of your 2010 reports combined discloses transfers totaling \$347,430.59 from "Franken Recount Fund," \$88,152 from "Minnesota Victory

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2010," and \$7,662.38 from "DSP Joint Victory Fund," which are joint fundraising committees affiliated with your committee. The sum of the entries itemized on the memo Schedule A, however, total only \$35,000, \$86,100, and \$7,162.77, respectively.

Please be advised that a memo Schedule A must be provided to itemize your committee's share of the gross contributions received through the joint fundraisers. The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the calendar year, and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount. 11 CFR §102.17(c)(8)(i)(B) Please clarify this discrepancy.

4. On Schedule H2 of your report you disclose the ratios for "State Convention 2010" to be 80% Federal and 20% Non-Federal and for "DFL Barbecue, 8/21/10" to be 50% Federal and 50% Non-Federal. However, your Schedule H4 calculations reflect the ratios for "State Convention 2010" to be 44% Federal and 54% Non-Federal and for "DFL Barbecue, 8/21/10" to be 15% Federal and 85% Non-Federal. Please amend your report to clarify this discrepancy.

Please note that if your non-federal account has overpaid your federal account because of this miscalculation, it will be necessary to immediately transfer these funds back to the non-federal account. While the Commission may take further legal action concerning any impermissible overpayments by the non-federal account, your prompt action will be taken into consideration.

5. On Schedule H5 you have failed to provide the full name of the account for a transfer-in totaling \$59,925. Please amend your report to identify the full name of the non-federal or Levin account from which each transfer-in is made. 11 CFR §300.36(b)(2)(ii)

6. Schedule H5 of your report discloses a transfer-in from a non-federal or Levin account for the Voter ID category which appears to exceed the permissible amount indicated by your allocation ratio for this activity/event. Please be advised that transfers for allocated Federal Election Activity must not exceed the Levin share of the allocated disbursements and that these transfers must be made within a 70-day time period: no more than 10 days before and no more than 60 days after payment to the vendor. 11 CFR §300.33(d)(2) Please clarify the nature of this transfer-in from the non-federal or Levin account.

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The Commission recommends that you immediately transfer the total excessive amount received by your federal account back to your non-federal or Levin account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

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) 694-1148.

Sincerely,



Quy Vuong
Senior Campaign Finance Analyst
Reports Analysis Division