



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Howard Wolfson, Treasurer  
Democratic Congressional Campaign  
Committee - Expenditures  
430 South Capitol Street SE  
Washington, DC 20003

JUL 18 2000

Identification Number: C00000935

Reference: May Monthly (4/1/00-4/30/00) and October Monthly (9/1/00-9/30/00)  
Reports

Dear Mr. Wolfson:

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 discloses independent expenditures on behalf of federal candidates (pertinent portion(s) attached). Schedule B of a previous report disclosed in-kind contributions on behalf of some of these same candidates. Under 2 U.S.C. §431(17), an "independent expenditure" is defined as:

... an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate which is made without cooperation or consultation with any candidate, or any authorized committee or agent of such candidate, and which is not made in concert with, or at the request or suggestion of, any candidate, or any authorized committee or agent of such candidate.

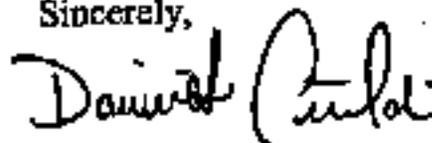
The coordination involved in making an in-kind contribution to a candidate may preclude your committee from making an independent expenditure in support of the same candidate. Under 11 CFR §109.1(c), any expenditure which does not qualify as an independent expenditure is considered an in-kind contribution. Please amend your reports to disclose the aforementioned transactions as in-kind contributions (Schedule B

supporting Line 23 of the Detailed Summary Page), or provide additional clarifying information concerning the independent expenditures made in support of Matt Mangino and Tom Keefe.

If the reclassification of these expenditures as in-kind contributions results in excessive contributions, the Commission recommends that you notify the recipient(s) and request a refund of the amount in excess of \$5,000 per election. Please inform the Commission immediately in writing and provide a photocopy of your refund request(s) sent to the recipient(s). In addition, any refund should be disclosed on Schedule A supporting Line 16 of your next report.

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,



Dominick Ciaraldi  
Reports Analyst  
Reports Analysis Division

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Name of Committee (in Full)				C00000935	
DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE - EXPENDITURE					
Full Name, Mailing Address & ZIP Code of Each Payer	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought	
The Clinton Group, Inc. 1350 Connecticut Ave., NW Suite 1102 Washington, DC 20036	Phone-Banking	04/03/00	\$9,512.00	Matt Mangino U.S. House PA/04 <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	
Labels & Lists, Inc. 2500 116th Ave., NE Bellevue, WA 98004	Phone List	04/03/00	\$1,336.25	Matt Mangino U.S. House PA/04 <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose	
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose	
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose	
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose	
(a) SUBTOTAL of Itemized Independent Expenditures			\$ 10,848.25		
(b) SUBTOTAL of Unitemized Independent Expenditures			\$		
(c) TOTAL Independent Expenditures			\$ 10,848.25		

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Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, the campaign committee, or their agent.

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 2000.

My Commission expires: \_\_\_\_\_

NOTARY PUBLIC

Signature

Date

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Name of Committee (in Full)				
Democratic Congressional Campaign Committee - Expenditures				
Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Winning Connections, Inc. 317 Pennsylvania Ave., SE Suite 200 Washington, DC 20003	Communications Services	09/19/00	\$14,028.25	Tom Keefe WA/05 House <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
(a) SUBTOTAL of itemized independent expenditures			\$ 14,028.25	
(b) SUBTOTAL of unitemized independent expenditures			\$ 0.00	
(c) TOTAL independent expenditures			\$ 14,028.25	

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I, the undersigned, certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this 13<sup>th</sup> day of

October 2000

My Commission expires:

Oct 31, 2002

Mable Spuris  
NOTARY PUBLIC

Jessica Kyriacopoulos

10/13/00

