



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

James Scheibel, Treasurer
Democrats 2000
1311 L St NW, Suite 300
Washington, DC 20005

Identification Number: C00230342

NOV 24 1999

Reference: Mid-Year Report (1/1/99-6/30/99)

Dear Mr. Scheibel:

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 contributions from corporations and labor organizations. 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations and labor organizations unless made from separate segregated funds established by the corporations and labor organizations.

If the contributions in question were incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have received prohibited contributions, you must transfer-out the impermissible funds to an account not used to influence federal elections or refund the full amount to the donors in accordance with 11 CFR §103.3(b). In the best interest of your committee, all transfers-out and refunds should be made within thirty days of the treasurer's receipt of the impermissible funds. In order to protect the donor's interests, the Commission recommends that you inform the contributors in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

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 transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

-Your report does not include a Schedule H1 to disclose the ratio for the allocation of administrative and generic voter drive costs. This ratio is determined at the beginning of each two-year election cycle. All shared administrative and generic voter drive costs incurred during the two-year cycle must be allocated according to this ratio, unless the federal account elects to pay a higher percentage of its cost. 11 CFR §106.5(b)(2), (d)(1), (d)(2) and 11 CFR §§104.10(b)(1)(ii)(B) and 106.6(c)

-You must attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may establish "best efforts" by providing the Commission with a description of its procedures for requesting the information. It is also in the best interests of the committee to provide a copy of its solicitation. In order to establish "best efforts", the committee must demonstrate that it makes at least one request for the information after the contribution is received. This one request must be made for any solicited or unsolicited contribution that, in the aggregate, exceeds the \$200 threshold and lacks the necessary information.

Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that, in the aggregate, exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make a written or oral request for the information. Please note that a written request

may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation, and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle.

If a committee receives contributor information after the contributions have been reported, the committee shall either a) file with its 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 its next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.3(a)(4)(i) and 11 CFR § 104.7)

-Please amend Schedule A supporting Line 11(b) by providing the date and amount for each contribution received from a political committee. 11 CFR §104.3(a)(4)(ii) and (iii)(B)

-Please amend Schedule A supporting Line 11(c) by providing the full name and address for each contribution received from a political committee. 11 CFR §104.3(a)(4)(ii) and (iii)(B)

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies.

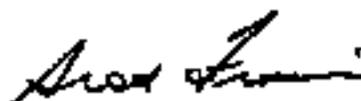
Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B or H4, supporting Line 21(a) or 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

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. My local number is (202) 694-1130.

Sincerely,



Scott A. Francis
Reports Analyst
Reports Analysis Division

SCHEDULE A ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page Page 1 of 3
For Line Number 11c

Contributions from Other Political Committees (such as PACs)

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 for such committee.

NAME OF COMMITTEE (In Full)
Democrats 2000

Full Name, Mailing Address & Zip Code	Name of Employer	Date(month day, year)	Amount of Each Receipt this period
AFSCME 1325 L St., NW Washington, DC 20036		01/27/99	2500.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year To Date > \$ 2500.00	

Full Name, Mailing Address & Zip Code	Name of Employer	Date(month day, year)	Amount of Each Receipt this period
AFT 565 NJ Ave, NW Washington, DC 20001 2079		03/24/99	1000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year To Date > \$ 1000.00	

Full Name, Mailing Address & Zip Code	Name of Employer	Date(month day, year)	Amount of Each Receipt this period
ANA-PAC 600 Maryland Ave, SW Washington, DC 20024 2571		03/12/99	1000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year To Date > \$ 1000.00	

Full Name, Mailing Address & Zip Code	Name of Employer	Date(month day, year)	Amount of Each Receipt this period
Brotherhood of Locomotive Engineers 1370 Ontario St. Cleveland, OH 44113 1702		03/12/99	1000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year To Date > \$ 1000.00	

Full Name, Mailing Address & Zip Code	Name of Employer	Date(month day, year)	Amount of Each Receipt this period
CWA COPE PCC 601 3rd St., NW Washington, DC 20001		01/27/99	5000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year To Date > \$ 5000.00	

Full Name, Mailing Address & Zip Code	Name of Employer	Date(month day, year)	Amount of Each Receipt this period
IBT		03/12/99	2000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year To Date > \$ 2000.00	

SUBTOTAL of Receipts This Page (optional)-----> 12500.00

TOTAL This Period(last page this line number only)----> 12500.00

SCHEDULE A ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page
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 For Line Number 11c

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NAME OF COMMITTEE (In Full)

Democrats 2000

Full Name, Mailing Address & Zip Code NCPSSM 10 G St, NE Washington, DC 20002 Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Aggregate Year To Date > \$ 2000.00	Date(month day, year) 02/10/99	Amount of Each Receipt this period 2000.00
Full Name, Mailing Address & Zip Code NCPSSM 10 G St, NE Washington, DC 20002 Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Aggregate Year To Date > \$ 2500.00	Date(month day, year) 03/02/99	Amount of Each Receipt this period 500.00
Full Name, Mailing Address & Zip Code People for the American Way 2000 M St., NW Ste 400 Washington, DC 20036 Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Aggregate Year To Date > \$ 1000.00	Date(month day, year) 01/27/99	Amount of Each Receipt this period 1000.00
Full Name, Mailing Address & Zip Code Signalman's Political League P.O. Box U Mt. Prospect, IL 60056 Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Aggregate Year To Date > \$ 1000.00	Date(month day, year) 03/24/99	Amount of Each Receipt this period 1000.00
Full Name, Mailing Address & Zip Code Transportation Communications Union 3 Research Place Rockville, VA 20850 Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Aggregate Year To Date > \$ 1000.00	Date(month day, year) 01/27/99	Amount of Each Receipt this period 1000.00
Full Name, Mailing Address & Zip Code UFCW 1775 K St. NW Washington, DC 20006 Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Aggregate Year To Date > \$ 500.00	Date(month day, year) 03/24/99	Amount of Each Receipt this period 500.00

SUBTOTAL of Receipts This Page (optional)----->

6000.00

TOTAL This Period(last page this line number only)----->

18500.00

SCHEDULE A ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page	Page 3 of 3 For Line Number 11c
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NAME OF COMMITTEE (in Full)
Democrats 2000

Full Name, Mailing Address & Zip Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this period
UFCW 1775 K St, NW Washington, DC 20006 Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		04/28/99	2000.00
Aggregate Year To Date > \$ 2500.00			
UNITE 888 16th St., NW Ste 303 Washington, DC 20006 Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		01/27/99	1000.00
Aggregate Year To Date > \$ 1000.00			
United Mine Workers 905 15th St. Washington, DC 20005 Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		06/02/99	1000.00
Aggregate Year To Date > \$ 1000.00			

SUBTOTAL of Receipts This Page (optional) ----->

4000.00

TOTAL This Period (last page this line number only) ----->

22500.00

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