



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

Dennis M. Charles, Treasurer  
Indiana Democratic Congressional  
Victory Committee  
One North Capitol, Suite 1100  
Indianapolis, IN 46204

NOV 8 1995

Identification Number: C00108613

Reference: Mid-Year Report (1/1/95-6/30/95)

Dear Mr. Charles:

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:

-The Summary Page discloses \$265,502.75 on Line 6(c) and \$241,788.14 on Line 7, but the Detailed Summary Page shows the Line 19 and Line 30 total to be \$528,213.84 and \$501,141.19, respectively. Line 6(c) should be the same as Line 19 and Line 7 should be the same as Line 30. Please amend your report accordingly.

-Your calculations for Line 11(a)(iii), Column A appear to be incorrect. FEC calculations disclose this amount to be \$262,243.42. Please provide the corrected total on the Detailed Summary Page.

-2 U.S.C. §434(b)(3) requires itemization of contributions from individuals and persons other than political committees, where the aggregate total from the contributor exceeds \$200 in a calendar year. In addition, 11 CFR §104.3(a)(2)(i)(B) requires a committee to report the total amount of unitemized contributions (see Line 11(a)(ii) of the Detailed Summary Page). If a committee wishes to disclose contributions regardless of the amount contributed, the committee must separate (on separate receipt schedules) those contributors requiring itemization from those who are not required to be itemized. 11 CFR §104.3(a)(4)(i) For future filings, please submit your reports in this order.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Transfers from affiliated/other

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PAGE 2

party committees, such as ASDC - Dollars for Democrats, should be properly disclosed on a separate Schedule A, supporting Line 12 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-State party committees can only take one point for local candidates on Schedule H1. Please amend your Schedule H1 by using the current version of the schedule enclosed.

-Schedule H2 of your report indicates that your committee participated in fundraising, exempt, and direct candidate support activities or events during the reporting period. However, there are no corresponding disbursements reflected on your Schedule H4. If any disbursements were incorrectly reported, you should file an amended Schedule H4 with the correct unique identifying code or title.

Note that you need not include activities on Schedule H2 if there are no corresponding payments made for the activity during the reporting period.

-On Schedule H2, you have disclosed allocation percentage ratios for all activities which do not equal 100% when added together. Please amend your report to correct this discrepancy. 11 CFR §104.10(a)(1)

-On Schedule H2, you have failed to check the ratio type box (i.e., NEW, REVISED, SAME AS PREVIOUSLY REPORTED). Please amend your report to correct this omission. 11 CFR §104.10(a)(1)

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to check the appropriate CATEGORY box for the payment(s) made to several vendors. Please amend your report to disclose the appropriate category.

-Your EVENT YEAR-TO-DATE calculations for Gov Club 94 and JJ 1995 are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that

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category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct Gov Club 94 and JJ 1995 EVENT YEAR-TO-DATE totals.

-Please clarify all expenditures made for media on Schedule H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or F supporting Line 23 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

-Schedule H4 discloses disbursements for Embassy Suites, Geno and Khan's Fine Wine & Spirits which are categorized as fundraising; however, Schedule H2 does not include an allocation ratio for this activity. Please amend Schedule H2 to disclose the omitted ratio.

-Schedule B supporting Line 22 (pertinent portion(s) attached) discloses \$143,500 in disbursements to Indiana Democratic State Committee for trans. non-fed acct. You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information regarding these transactions including the date(s) when the original activity was conducted by the non-federal account. In addition, if any of the disbursements disclosed on Schedule B supporting Line 22 were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in-kind contributions on Schedule B supporting Line 23, or as coordinated expenditures on Schedule F supporting Line 25. 11 CFR §§104.3(b)(3) and 106.1

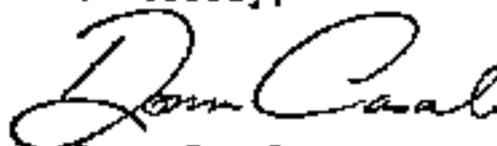
Although the Commission may initiate legal action regarding the activities conducted by your non-federal account, any clarifying information that you can provide will be taken into consideration.

-Your report includes computer produced formats of Schedules A, B, and H4. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

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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) 219-3580.

Sincerely,



Donn Casale  
Reports Analyst  
Reports Analysis Division

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SCHEDULE B, TRANSFERS TO OTHER PARTY COMMITTEES  
FOR 01/01/95 THRU 06/30/95

PAGE 1 OF 3  
FOR LINE 22

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 use

NAME: INDIANA DEMOCRATIC CONGRESSIONAL VICTORY COMMITTEE (C00108613)

Full Name & Mailing Address	Purpose	Date	Amount
Indiana Democratic State Committee 1 N Capitol Ave Ste 1100 Indianapolis, IN 46204-2026	trans. non-fed acct	01/06/95	\$ 10,000.00
DISBURSEMENT FOR <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Indiana Democratic State Committee 1 N Capitol Ave Ste 1100 Indianapolis, IN 46204-2026	trans. non-fed acct	01/13/95	\$ 5,000.00
DISBURSEMENT FOR <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Indiana Democratic State Committee 1 N Capitol Ave Ste 1100 Indianapolis, IN 46204-2026	trans. non-fed acct	01/19/95	\$ 6,000.00
DISBURSEMENT FOR <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Indiana Democratic State Committee 1 N Capitol Ave Ste 1100 Indianapolis, IN 46204-2026	trans. non-fed acct	02/03/95	\$ 18,000.00
DISBURSEMENT FOR <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Indiana Democratic State Committee 1 N Capitol Ave Ste 1100 Indianapolis, IN 46204-2026	trans. non-fed acct	02/10/95	\$ 5,000.00
DISBURSEMENT FOR <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Indiana Democratic State Committee 1 N Capitol Ave Ste 1100 Indianapolis, IN 46204-2026	trans. non-fed acct	02/20/95	\$ 9,000.00
DISBURSEMENT FOR <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Indiana Democratic State Committee 1 N Capitol Ave Ste 1100 Indianapolis, IN 46204-2026	trans. non-fed acct	02/28/95	\$ 25,000.00
DISBURSEMENT FOR <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
SUBTOTALS FOR THIS PAGE			\$ 78,000.00

SCHEDULE B, TRANSFERS TO OTHER PARTY COMMITTEES  
FOR 01/01/95 THRU 06/30/95

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FOR LINE 22

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by any person for the purpose of soliciting contributions or for commercial use

NAME: INDIANA DEMOCRATIC CONGRESSIONAL VICTORY COMMITTEE (C00108613)

Full Name & Mailing Address	Purpose	Date	Amount
Indiana Democratic State Committee 1 N Capitol Ave Ste 1100 Indianapolis, IN 46204-2026	trans. non-fed acct	03/30/95	\$ 8,000.00
DISBURSEMENT FOR <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Indiana Democratic State Committee 1 N Capitol Ave Ste 1100 Indianapolis, IN 46204-2026	trans. non-fed acct	04/13/95	\$ 9,000.00
DISBURSEMENT FOR <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Indiana Democratic State Committee 1 N Capitol Ave Ste 1100 Indianapolis, IN 46204-2026	trans. non-fed acct	04/18/95	\$ 4,000.00
DISBURSEMENT FOR <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Indiana Democratic State Committee 1 N Capitol Ave Ste 1100 Indianapolis, IN 46204-2026	trans. non-fed acct	04/28/95	\$ 7,000.00
DISBURSEMENT FOR <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Indiana Democratic State Committee 1 N Capitol Ave Ste 1100 Indianapolis, IN 46204-2026	trans. non-fed acct	05/01/95	\$ 3,000.00
DISBURSEMENT FOR <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Indiana Democratic State Committee 1 N Capitol Ave Ste 1100 Indianapolis, IN 46204-2026	trans. non-fed acct	05/05/95	\$ 5,500.00
DISBURSEMENT FOR <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Indiana Democratic State Committee 1 N Capitol Ave Ste 1100 Indianapolis, IN 46204-2026	trans. non-fed acct	05/12/95	\$ 5,000.00
DISBURSEMENT FOR <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
SUBTOTALS FOR THIS PAGE			\$ 41,500.00



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