



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

RQ-2

Gilbert T. Adams, Jr., Treasurer  
Jefferson County Democratic Party  
1855 Calder Avenue  
Beaumont, TX 77701

APR 30 2003

Identification Number: C00253880

Reference: 30 Day Post-General Report (10/17/02-11/25/02)

Dear Mr. Adams:

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 receipts totaling \$38,428.49 from Lampson for Congress for "Reimb-Coordinated Effort-Voter Drive." Please provide further clarification for this activity and be advised that 2 U.S.C. §441a(f) and 11 CFR §110.1(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

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Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-Please clarify all expenditures made for voter drive activity on Schedule(s) H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E, or F supporting Lines 23, 24, or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Schedule H4 of your report appears to disclose disbursements associated with fundraising activities/events that have been incorrectly categorized as Administrative/Voter Drive expenses. Payments made for expenses relating to committee fundraising must adhere to the following reporting requirements:

- 1.) A committee which allocates the costs of fundraising events between its federal and non-federal accounts is required to allocate the costs directly associated with a fundraising program or event according to the "funds-received" method. The fundraising ratio shall be estimated prior to each fundraising

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event based on the committee's reasonable prediction of its federal and nonfederal revenue from that event. The estimated percentage of federal funds received to nonfederal funds received for a fundraising event must be disclosed on a Schedule H2 with a unique identifier code and included with each report disclosing a disbursement for that event or program.

- 2.) Any transfer received from you nonfederal account for the nonfederal account's share of fundraising expenses must be disclosed on a Schedule H3 identifying the date of receipt, amount, fundraising event and unique identifier code.
- 3.) All disbursements for fundraising expenses which have been allocated between the federal and nonfederal accounts must be categorized as fundraising disbursements on Schedule H4. The date of disbursement, purpose of disbursement, unique identifier code, event year-to-date total and both the federal and nonfederal shares of the disbursement must also be provided.
- 4.) The committee has up to 60 days after the ending date of the event to adjust the estimated allocation ratio based on the actual funds received.
  - a.) The committee must report the adjusted ratio for the fundraising event on Schedule H2 and date of the fundraising event.
  - b.) If the adjusted ratio increases the federal portion of the fundraising ratio the federal account must make a transfer to the nonfederal account for any nonfederal overpayment of fundraising expenses on Schedule H4.

Please amend your report to properly disclose the payments made for "Reimb-Fund Raising-Voter Drive" on Schedule H4.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): "Supplies-Early Voting-Voter Drive," "Supplies-Early Voting Wkrs-Voter Drive," and "Supplies-Voter Drive." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Your committee reports disbursements on Schedule B and Schedule H4 to Damon Mattox, which appear to be duplicate payments. Please note that

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any activity which is financed entirely by the federal account should be reported on Schedule B supporting Line 21(b), not Schedule H4 supporting Line 21(a)(i). Likewise, any allocable expenses which are paid jointly should only be disclosed on Schedule H4 supporting Line 21(a)(i), not Schedule B supporting Line 21(b). Duplication in reporting disbursements may cause inflated disbursement totals. Please amend your report to clarify your disbursements. 11 CFR §106.5

-Your report discloses a transfer(s) for "Transfer-20% to State Acct-Voter Drive" to the Jeff. Co. Dem. Party-State Acct., which appears to be a non-federal account of your committee. 11 CFR §§106.5 and 106.6 prohibits a committee's federal account from reimbursing its non-federal account for shared allocable expenses. Also, the non-federal account is prohibited from paying the federal account's share of these expenses. These types of costs must be paid according to the allocation ratio derived from the appropriate method on Schedule H1.

If the transfer(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If your non-federal account has paid any expenditures which should have been allocated, you are advised to correct any non-compliance with 11 CFR §106.5 and 106.6 and establish procedures to insure future compliance with allocation regulations.

Although the Commission may take further legal action regarding this improper allocation activity, your prompt action will be taken into consideration.

A response or 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. 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 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,



Kristen R. Davis  
Campaign Finance Analyst  
Reports Analysis Division

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

Use separate schedule(s)  
or each category of the  
Detailed Summary Page

FOR LINE NUMBER:		PAGE 5 / 38	
(check only one)			
<input type="checkbox"/> 11a	<input checked="" type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
			<input type="checkbox"/> 17

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 from such committee.

NAME OF COMMITTEE (In Full)  
JEFFERSON COUNTY DEMOCRATIC PARTY

**A.** Full Name (Last, First, Middle Initial)  
Lampson for Congress

Mailing Address  
P.O. Box 21578  
City: Beaumont State: TX Zip Code: 77720

Date of Receipt  
M M / D D / Y Y Y Y  
10 / 18 / 2002

Amount of Each Receipt This Period  
5000.00

Reimb-Coordinated Effort-Voter Drive

Transaction ID: SA11B.4281

FEC ID number of contributing federal political committee.

Name of Employer: Occupation:

Receipt For: 2002  
Primary  General  Other (specify) ▼

Aggregate Year-to-Date ▼  
5000.00

**B.** Full Name (Last, First, Middle Initial)  
Lampson for Congress

Mailing Address  
P.O. Box 21578  
City: Beaumont State: TX Zip Code: 77720

Date of Receipt  
M M / D D / Y Y Y Y  
10 / 29 / 2002

Amount of Each Receipt This Period  
8900.00

Reimb-Coordinated Effort-Voter Drive

Transaction ID: SA11B.4288

FEC ID number of contributing federal political committee.

Name of Employer: Occupation:

Receipt For: 2002  
Primary  General  Other (specify) ▼

Aggregate Year-to-Date ▼  
13900.00

**C.** Full Name (Last, First, Middle Initial)  
Lampson for Congress

Mailing Address  
P.O. Box 21578  
City: Beaumont State: TX Zip Code: 77720

Date of Receipt  
M M / D D / Y Y Y Y  
11 / 04 / 2002

Amount of Each Receipt This Period  
21000.00

Reimb-Coordinated Effort-Voter Drive

Transaction ID: SA11B.4291

FEC ID number of contributing federal political committee.

Name of Employer: Occupation:

Receipt For: 2002  
Primary  General  Other (specify) ▼

Aggregate Year-to-Date ▼  
34900.00

SUBTOTAL of Receipts This Page (optional) ..... ▶ 34900.00

TOTAL This Period (last page this line number only) ..... ▶

KRD

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

Use separate schedules) or each category of the Detailed Summary Page		FOR LINE NUMBER: (check only one)		PAGE 6 / 33	
<input type="checkbox"/> 11a	<input checked="" type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17			

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 from such committee.

NAME OF COMMITTEE (In Full)  
JEFFERSON COUNTY DEMOCRATIC PARTY

Full Name (Last, First, Middle Initial) A. Lampron for Congress Mailing Address P.O. Box 21578 City _____ State TX Zip Code 77720 Department _____ FEC ID number of contributing federal political committee. _____ Name of Employer _____ Occupation _____ Receipt For: 2002 Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) ▼ _____ Aggregate Year-to-Date ▼ 37882.50		Date of Receipt M M D D Y Y Y Y 11 22 2002 Amount of Each Receipt this Period 2982.50 Reimb-Coordinated Effort-Voter Drive Transaction ID: SA11B.4298
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Full Name (Last, First, Middle Initial) B. Lampron for Congress Mailing Address P.O. Box 21578 City _____ State TX Zip Code 77720 Department _____ FEC ID number of contributing federal political committee. _____ Name of Employer _____ Occupation _____ Receipt For: 2002 Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) ▼ _____ Aggregate Year-to-Date ▼ 38428.49		Date of Receipt M M D D Y Y Y Y 11 22 2002 Amount of Each Receipt this Period 545.98 Reimb-Coordinated Effort-Voter Drive Transaction ID: SA11B.4301
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SUBTOTAL of Receipts This Page (optional) .....		3528.49
TOTAL This Period (last page this line number only) .....		38428.49

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