



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 10, 2008

RQ-2

William J. Davis, Treasurer
Minnesota Democratic Farmer Labor Party
255 East Plato Blvd.
Saint Paul, MN 55107

Response Due Date:
July 11, 2008

Identification Number: C00025254

Reference: April Monthly Report (3/1/08-3/31/08)

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 8 items:

1. The totals listed on Lines 6(c), 18(a), 18(c), and 19, 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 supporting Line 15 of your report discloses receipts from "Ellison (Keith) for Congress" which require further clarification. For example, if this activity represents a transfer of funds, please indicate "transfer" on Schedule A supporting Line 11(c) of your report. If this activity represents a reimbursement for services provided to this committee, please indicate this on Schedule A supporting Line 15 of your report. Please amend your report to clarify the type of activity these receipts represent.
3. Schedule A supporting Line 17 of your report discloses a receipt totaling \$7,773.30 from "MN Department of Finance." Please amend your report to clarify the nature of this receipt.

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4. Schedule B discloses an expenditure for "Direct Mail Envelopes." If a portion or all of this expenditure was for a public communication (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

5. The outstanding balance of a debt owed to a creditor at the close of one report should be exactly the same as the outstanding balance beginning the period of the next report. This report shows beginning outstanding balances to "Weinblatt & Gaylord PLC," which are not identical to the ending outstanding balances for the creditors on the March Monthly Report (2/1/08-2/29/08). Please amend your report to clarify the discrepancy.

6. Schedule D supporting Line 10 of your report discloses several debts owed by your committee with negative closing balances totaling "\$6,658.85." You are advised that any debts with negative closing balances require further clarification. A negative closing balance suggests that you have either made mathematical errors or overpaid the debts which would result in the vendors incurring debts owed to your committee and should be reported on Schedule D supporting Line 9 of your report.

Further, a credit from a vendor should be reported as a negative entry in the "amount incurred this period" field of the original debt and not as a separate debt transaction. In addition, credits from vendors require clarifying information to ensure that your committee did not receive a prohibited in-kind contribution per 11 CFR. §100.52 (d)(1). Please amend your report to clarify the nature of these transactions.

7. On Schedule D of your previous report, you disclosed a debt owed to "American Printing." This obligation, however, has been omitted from this report. Please amend your report to include this debt on Schedule D and Line 10 of the Summary Page. All debts and obligations must be disclosed until extinguished. 11 CFR §104.11

8. Your report discloses outstanding balances beginning this period for debts owed to "Aqua Engineering" and "Cartridge Care." However, outstanding balances at the close of the period were not disclosed on your

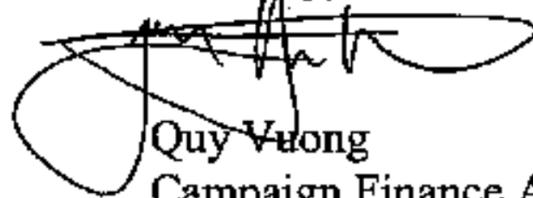
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March Monthly Report (2/1/08-2/29/08). Please amend your report(s) to clarify this discrepancy.

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
Campaign Finance Analyst
Reports Analysis Division

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