



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 2, 2007

Jan Churchill, Treasurer
Nevada State Democratic Party
409 Horn Street
Las Vegas, NV 89107

Response Due Date:
April 2, 2007

Identification Number: C00208991

Reference: Amended 12 Day Pre-General Report (10/1/06 – 10/18/06)

Dear Ms. Churchill:

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. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-On Schedule L-A supporting Line 1(a) of the Schedule L Aggregation Page for Levin Funds, your report disclosed donations from entities that omit the occupation and employer. Please be advised that 11 CFR §300.36(b)(2)(iv) requires the itemization of the receipt of Levin funds for Federal Election Activity when the amount donated is \$200 or more from an entity in a calendar year. Please amend your report to disclose the information.

-Schedule B supporting Line 30(b) of your report discloses a payment(s) for "Ad production," "Early vote mail piece," "Early vote phone calls," "Monthly phonebanking fees," "Postage," "Postage/business reply," "Postage/vote by mail piece" and "Vote By Mail piece" which is categorized as Federal Election Activity and therefore, may require the disclosure of the candidate(s) this activity should be attributed to. Expenditures and disbursements for public communications that refer to a clearly identified candidate for Federal office and that promote, support, attack or oppose any candidate for Federal office, meet the definition of Federal Election Activity under 11 CFR §100.24 and should be disclosed on Schedule B for Line 30(b) along with the identity of the candidate(s).

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Further, please be advised that public communications that meet the definition of Federal Election Activity and that also contain express advocacy as defined under 11 CFR §100.22, but do not meet the conditions of exempt activity, would constitute an in-kind contribution, an independent expenditure or a coordinated party expenditure and should be properly disclosed on a Schedule B, E or F supporting Lines 23, 24 or 25, as appropriate rather than on Schedule B for Line 30(b). Please clarify if this activity meets the definition of Federal Election Activity or if it contains express advocacy and amend your report to properly disclose this activity, if necessary.

-On the Schedule L Aggregation Page for the Non-federal Levin account, the beginning cash balance, Line 7, Column A, should equal the ending balance, Line 11, Column A, of your previous report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-The totals listed on Lines 5 and 6, Column B of the Schedule L Aggregation Page for the Non-federal Levin account appear to be incorrect. Please be advised that you should add the "Column B Year-to-Date" total from your previous report to the current "Column A Total This Period" figure to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-Your calculations for Line 10, Column B on the Schedule L Aggregation Page for the Non-federal Levin account appear to be incorrect. FEC calculations disclose this amount(s) to be \$83,905.48. Please amend your report to disclose the corrected total(s).

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. 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.

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- 1157.

Sincerely,



Laura E. Sinram
Senior Campaign Finance Analyst
Reports Analysis Division

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