

ARLINGTON JOINT DEMOCRATIC COMMITTEE
4620 Lee Highway, Suite 208
Arlington, Virginia 22207

October 31, 1995

Ms. Wendy Barkley, Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

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Dear Ms. Barkley:

We are in receipt of your letter of September 27, 1995, requesting additional information concerning the Arlington Democratic Joint Campaign's ("ADJC") 1995 Mid-Year Report. More specifically, your letter asks whether a January 19, 1995 disbursement to the Arlington County Democratic Committee in the amount of \$6,318.64 for "facility reimbursement" should have been treated as a shared allocable expense and paid subject to an appropriate allocation method reflected on a Schedule H. In addition, your letter inquires about the absence of any disclosure of administrative expenses and generic voter drive costs. The following should be responsive to both of your questions.

ADJC was established and registered as a federal political committee in July 1994. It is a subordinate committee to the Arlington County Democratic Committee ("ACDC"), a local party organization. However, ADJC does not regularly engage in or otherwise finance joint federal/non-federal activities with ACDC. It engages solely in federal election activities, and it undertakes its activities alone, paying the full cost of its activities and not sharing the cost with ACDC.^{1/}

ADJC is not a year-round operation. Its level of activity increases as a federal general election draws near. At other times it is virtually dormant.

ADJC is an all-volunteer organization, so it has no employees and pays no salaries. Because many of its volunteers also volunteer for ACDC, it was convenient to work from ACDC's office. ADJC agreed to pay its fair share for the use of ACDC's office space and equipment and related expenses (utilities, office supplies, telephones, etc.). However, since the amount of

^{1/} Close to the general election, ADJC engaged in a joint federal-non federal activity with ACDC, which involved the printing of a sample ballot. ADJC disclosed this activity by filing the requisite allocation forms.

time ADJC would utilize ACDC's office space and resources would vary from month to month and was not predictable in advance, it was determined that the amount charged to ADJC would vary accordingly -- dependent upon use.

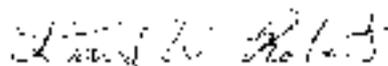
ADJC was virtually dormant during the summer of 1994. Consequently, it incurred very minimal expenses during this period. Because of ADJC's limited activity in the summer, no bill was sent for this period of time.

ADJC became increasingly active as the general election drew near, and it was accordingly billed for September, October and November 1994. A bill was sent in December 1994 and paid by ADJC in January 1995.^{2/} The amount paid by ADJC, \$6,318.64, reflects approximately 40% of ACDC's overall office/related expenses for that time. The amount charged was the result of a reasonable allocation of ACDC's rent and expenses for the period, based on an estimate of the amount of time spent by volunteers on ADJC activities. Since the November election, ADJC's level of activity has decreased, and it is now virtually dormant once again.

Since ADJC does not maintain a federal and non-federal account and because it does not ordinarily engage in joint federal/non-federal activities with ACDC, it did not appear necessary to file a Schedule H1.

We hope the aforementioned provides a satisfactory response to your request. Should you have any questions or require additional information, please do not hesitate to call.

Sincerely,



Dave Roberts
Treasurer

^{2/} This information was disclosed in ADJC's FEC reports and in a letter sent to Mr. Jordan Frame on March 31, 1995.

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