



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Jim Pledger, Treasurer  
The Democratic Party of  
Arkansas Federal Account  
1300 West Capitol  
Little Rock, AR 72201

JUL 2 1986

Identification Number: C00024372

Reference: April Quarterly Report (1/1/96-3/31/96)

Dear Mr. Pledger:

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 a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee from receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on

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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.

-Schedule A of your report (pertinent portion(s) attached) discloses a receipt(s) of \$372,242.72 from the Democratic Party of Arkansas. Please clarify whether this transfer(s) is from an account maintained by your committee for non-federal activity. If so, be advised that such a transfer is prohibited by 11 CFR §102.5(a)(1)(i) and the full amount of the transfer(s) should be returned to the non-federal account. Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on Schedule B supporting Line 22 of your next report.

If this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the impermissible funds or clarification of the transaction, will be taken into consideration.

-Line 18 of the Detailed Summary Page discloses \$371,242.72 in transfers from the non-federal account for joint activity. Your report does not include Schedule H4 which is intended to disclose the non-federal portion of shared expenses. While the non-federal account is permitted to transfer funds to the federal account for allocable activity, the transfers must be made within a 70-day time period: no more than 10 days before or 60 days after payment to the vendor.

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Transfers from the non-federal account for purposes other than shared activity or greater than the non-federal share of allocable activity are prohibited by 11 CFR 102.5(a)(1)(i). Please clarify this discrepancy and provide the required supporting Schedule H4 if necessary.

The Commission recommends that you immediately transfer back to the non-federal account, the amount which is either impermissible or in excess of the non-federal share. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-The beginning cash balance of this report should equal the ending balance of your Amended Year End Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Line 6(a) of the Summary Page represents the total cash-on-hand as of January 1, 1996. This figure should be the same on all the reports covering the calendar year. Please amend your report to clarify the change made in Line 6(a).

-Your calculations for Lines 6(a) through 8 appear to be incorrect. FEC calculations disclose this amount to be \$3,298.67. Please provide the corrected totals on the Summary Page.

-Your report disclosed a total of \$8,970.15 from "Unitemized Cash" receipts on Schedule A supporting Line 11(a)(i) of the Detailed Summary Page. Please explain why these receipts are included on Schedule A for Line 11(a)(i) or why the source of funds are disclosed as "Unitemized Cash". Please be advised that a party committee may not accept more than \$100 in currency from a person and must promptly return the amount over \$100 to the contributor when it has. 11 CFR 110.4(c)(2)

For your information, all contributions received that aggregate \$200 or less per individual for the calendar year should be reported on Line 11(a)(ii). Contributions received aggregating over \$200 per individual for the calendar year should be reported on Line 11(a)(i) and itemized on Schedule A.

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-You must make an attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may demonstrate "best efforts" to obtain the required information by providing the Commission with a description of its procedures for requesting the information and may also supply a copy of a solicitation; the committee must request the contributor information in initial solicitations; make follow-up requests (if necessary); report the information; and file amendments to disclose previously unreported information. Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make an additional written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle. Furthermore, if a committee receives contributor information after the contributions have been reported, it must submit, with its next report, an amended memo Schedule A listing all the contributions for which additional information was received or file, on or before the next reporting date, amendments to the previous reports on which the contributions were originally disclosed. See 11 CFR §104.3(a)(4)(1) and 11 CFR §104.7.

-Payments made to credit card companies must identify the original vendors from which you have purchased an item or service if your payments to these vendors have exceeded \$200 this year. Please amend your report by providing the date, amount, and purpose of such payments as required by 11 CFR §104.9(b).

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Transfers to the non-federal account should be properly disclosed on a separate

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Schedule B, supporting Line 22 (except when a previous transfer-in exceeded the non-federal share of allocable expense, then it would be disclosed on a separate Schedule H4, supporting Line 21(a)) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

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,



Edward D. Ryan  
Reports Analyst  
Reports Analysis Division

Contributions from Individuals/Persons

NAME OF COMMITTEE (in Full)  
DEMOCRATIC PARTY OF ARKANSAS C00024372

Any information copied from such Reports and Statements may not be sold or used by any person for the purposes of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Unitemized Cash	No Recorded Employer No Recorded Occupation	02/29/96	\$1.05
Receipt for [X] Primary	Aggregate YTD >		\$7042.10
Unitemized Cash	No Recorded Employer No Recorded Occupation	03/19/96	\$852.00
Receipt for [X] Primary	Aggregate YTD >		\$7894.10
Unitemized Cash	No Recorded Employer No Recorded Occupation	03/28/96	\$75.00
Receipt for [X] Primary	Aggregate YTD >		\$7969.10
Unitemized Cash	No Recorded Employer No Recorded Occupation	03/28/96	\$1000.00
Receipt for [X] Primary	Aggregate YTD >		\$8969.10
Unitemized Cash	No Recorded Employer No Recorded Occupation	03/31/96	\$1.05
Receipt for [X] Primary	Aggregate YTD >		\$8970.15
Joe White 29 Salem Rd. Conway, AR 72032-	No Recorded Employer No Recorded Occupation	03/18/96	\$320.00
Receipt for [X] Primary	Aggregate YTD >		\$320.00
Norman Wilkinson P.O. Box 954 Fort Smith, AR 72902-	No Recorded Employer No Recorded Occupation	03/21/96	\$6000.00
Receipt for [X] Primary	Aggregate YTD >		\$6000.00
Frank Williams 2921 Union Rd Paris, AR 72855-9803	No Recorded Employer No Recorded Occupation	03/21/96	\$1000.00
Receipt for [X] Primary	Aggregate YTD >		\$1000.00
Arnell Willis	No Recorded Employer No Recorded Occupation	03/27/96	\$1000.00
Receipt for [X] Primary	Aggregate YTD >		\$1000.00
SUBTOTAL of Receipts This Page.....>			\$10249.10
TOTAL This Period.....>			

*Edr*

SCHEDULE A  
Contributions from Individuals/Persons

NAME OF COMMITTEE (in Full)  
DEMOCRATIC PARTY OF ARKANSAS COND24372

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Richard Gardner Box 2692 Russellville, AR 72811- Receipt for [X] Primary	No Recorded Employer No Recorded Occupation	03/21/96	\$6000.00
	Aggregate YTD >		\$6000.00 <i>EDR</i>
Lloyd George	No Recorded Employer No Recorded Occupation	03/21/96	\$1000.00
	Aggregate YTD >		\$1000.00
Receipt for [X] Primary			
Bobby Glover P.O. Box 1 Carlisle, AR 72024- Receipt for [X] Primary	No Recorded Employer No Recorded Occupation	01/31/96	\$85.00
	Aggregate YTD >		\$85.00
Bobby Glover P.O. Box 1 Carlisle, AR 72024- Receipt for [X] Primary	No Recorded Employer No Recorded Occupation	02/29/96	\$85.00
	Aggregate YTD >		\$170.00
Bobby Glover P.O. Box 1 Carlisle, AR 72024- Receipt for [X] Primary	No Recorded Employer No Recorded Occupation	03/31/96	\$85.00
	Aggregate YTD >		\$255.00
Laverne Grayson Rt. 7, Box 219AA Harrison, AR 72601- Receipt for [X] Primary	No Recorded Employer No Recorded Occupation	01/31/96	\$85.00
	Aggregate YTD >		\$85.00
Laverne Grayson Rt. 7, Box 219AA Harrison, AR 72601- Receipt for [X] Primary	No Recorded Employer No Recorded Occupation	02/29/96	\$85.00
	Aggregate YTD >		\$170.00
Laverne Grayson Rt. 7, Box 219AA Harrison, AR 72601- Receipt for [X] Primary	No Recorded Employer No Recorded Occupation	03/31/96	\$85.00
	Aggregate YTD >		\$255.00
SUBTOTAL of Receipts This Page.....>			\$7510.00
TOTAL This Period.....>			

SCHEDULE A  
ITEMIZED RECEIPTS  
Contributions from Individuals/Persons

NAME OF COMMITTEE (in Full)  
DEMOCRATIC PARTY OF ARKANSAS C00024372

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
H. Maurice Mitchell 320 W. Capitol Suite 1000 Little Rock, AR 72201- Receipt for [X] Primary	Foundation Administrator	03/18/96	\$120.00
Aggregate YTD >			\$1120.00
Julia Fack Mobley 10 Acconac Place Texarkana, AR 75502 Receipt for [ ]	Banker	03/18/96	\$1000.00
Aggregate YTD >			\$1000.00
Michael Moody P. O. Box 55 Salem, AR 72576 Receipt for [X] Primary	No Recorded Employer No Recorded Occupation	03/18/96	\$255.00
Aggregate YTD >			\$255.00
Dickey Morton 810 S Cherry Hamburg, AR 71646- Receipt for [X] Primary	No Recorded Employer No Recorded Occupation	03/27/96	\$1000.00
Aggregate YTD >			\$1000.00
Robert Nelms 2933 S. College Dr. Fayetteville, AR 72701- Receipt for [X] Primary	No Recorded Employer No Recorded Occupation	03/18/96	\$280.00
Aggregate YTD >			\$280.00
Democratic Party Of Arkansas 1300 West Capitol Little Rock, AR 72201- Receipt for [ ]	No Recorded Employer No Recorded Occupation	03/19/96	\$1000.00
Aggregate YTD >			\$1000.00
R Phillips Receipt for [X] Primary	No Recorded Employer No Recorded Occupation	03/27/96	\$1000.00
Aggregate YTD >			\$1000.00
Billy Joe Purdom Rt. 1 Box 135B Yellville, AR 72687- Receipt for [X] Primary	No Recorded Employer No Recorded Occupation	03/19/96	\$1000.00
Aggregate YTD >			\$1000.00
SUBTOTAL of Receipts This Page.....>			\$5655.00
TOTAL This Period.....>			

*FOR*



Transfers from Nonfederal Account

NAME OF COMMITTEE (in Full)  
DEMOCRATIC PARTY OF ARKANSAS C00024372

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Democratic Party Of Arkansas 1300 West Capitol Little Rock, AR 72201- Receipt for [X]Primary	No Recorded Employer No Recorded Occupation	03/31/96	\$18060.00
Aggregate YTD >			\$371242.72
SUBTOTAL of Receipts This Page.....>			\$18060.00
TOTAL This Period.....>			\$371242.72

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