



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

March 6, 1992

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

ADVISORY OPINION 1992-2

Carol Darr, Chief Counsel  
Eric London, Assistant Counsel  
Democratic National Committee  
430 South Capitol Street, S.E.  
Washington, D.C. 20003

Dear Ms. Darr and Mr. London:

This responds to your letters dated January 6, 1992, and November 14, 1991, concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act"), and Commission regulations to a proposed retroactive reallocation of expenses previously allocated as administrative expenses by the Democratic National Committee ("the DNC").

You state that, for the purposes of the Commission's allocation regulations under 11 CFR Part 106, the DNC has treated all staff salaries, including those of the fundraising staff, as administrative expenses. The DNC believes that the salaries and benefits of staff members in the "Fundraising" and "Direct Mail" divisions could have been treated as direct costs of fundraising under the allocation regulations. You propose that the DNC be permitted to retroactively reallocate those salaries and employee fringe benefits paid from the beginning of 1991 under the category of fundraising, rather than under the category of administrative expenses.<sup>1/</sup> You ask for a time period of thirty days following the issuance of this opinion in which to make the necessary reallocations.

You explain that the Fundraising Division plans and executes "events" and "councils." Events include dinners and galas, i.e., events where tickets are sold as a means of fundraising. Councils are donor groups such as the Democratic Business Council, the Democratic Finance Council, and the Democratic Labor Council. The Fundraising Division staff maintains the memberships of the groups, and prospects for new members. The staff also holds meetings of the groups and solicits the membership for contributions.

The "Direct Mail" Division staff writes, produces, and sends direct mail solicitations to a group of individuals in the DNC donor database. The only joint fundraising program carried out by the DNC is by the Direct Mail Division in its state party direct mail program. All of the money raised by that joint fundraising program is Federal, and 95 percent of it is transferred to Federal accounts of state parties.

The only costs the DNC proposes to treat retroactively as fundraising, which were originally treated as administrative costs, are salaries and fringe benefits of DNC employees in the two divisions. These staff members spent 100 percent of their time on fundraising. The DNC does not propose to retroactively change the treatment of compensation paid to employees who worked part-time on fundraising.

Commission regulations provide for allocation of expenses by political party committees making disbursements for administrative expenses, fundraising, exempt activities, or generic voter drives in connection with both Federal and non-federal elections. 11 CFR 106.1(e). More specifically, party committees that make disbursements in connection with Federal and non-federal elections shall allocate expenses for (i) administrative expenses not attributable to a clearly identified candidate, including rent, utilities, supplies, and salaries; (ii) the direct costs of a fundraising program or event, including disbursements for solicitation of funds and for planning and administration of actual fundraising events, where Federal and non-federal funds are collected by one committee through such a program or event; (iii) party activities that are exempt from the Act's definition of contribution and expenditure such as the production and distribution of slate cards and sample ballots, campaign materials distributed by volunteers, and voter registration and GOTV drives for presidential nominees, where such activities are conducted in conjunction with non-federal activities; and (iv) generic voter drives or other activities that urge the public to support candidates of a particular party or associated with a particular issue without mentioning a specific candidate. 11 CFR 106.5(a)(2)(i), (ii), (iii), and (iv).

All administrative expenses must be allocated between Federal and non-federal accounts, if incurred by a committee that makes disbursements in connection with both Federal and non-federal elections, and that chooses to pay any portion of such disbursements from its non-federal account. Federal Election Commission Regulations on Methods of Allocation Between Federal and Non-Federal Accounts; Payments; Reporting; Explanation and Justification, 55 Fed. Reg. 26058, 26063 (June 26, 1990). Each national party committee, other than a Senate or House campaign committee, shall allocate a fixed percentage of its administrative expenses and costs of generic voter drives during a reporting period, such Federal percentages differing depending upon whether they were incurred in a presidential election year. 11 CFR 106.5(b)(1) and (2).

Fundraising costs, however, must be allocated on a different basis, i.e., on the basis of the particular event or program. A party committee, whether national or not, allocates the direct costs of each fundraising program or event, if both Federal and non-federal funds are collected by that one committee through such program or event. (This is not to be confused with joint fundraising events conducted by more than one committee.) 11 CFR 106.5(f); 55 Fed. Reg. at 26065. A party committee should allocate its fundraising costs based on the ratio of funds

received into its Federal account to its total receipts from each fundraising program or event.<sup>2/</sup> Each event or program has its own ratio.

The Commission concludes that the DNC may retroactively reallocate the salaries and benefits of staff members in the Fundraising and Direct Mail Divisions, i.e., staff members who spent 100 percent of their time on fundraising, under the category of direct fundraising costs. The Commission cautions that such recategorization must comply with the allocation regulations. Only salary and benefit amounts directly attributable to time spent on events or programs where the DNC collects both Federal and non-federal funds may be treated as fundraising costs. In addition, such salary and benefit costs must be directly attributable to discrete events or programs and reported as such, with a particular ratio for each program or event. If the DNC implements the reallocations permitted by this opinion, salary and benefit payments directly attributable to an event or program that is fundraising only for a DNC Federal account will not be allocable in any category under 11 CFR 106.5, and instead must be paid entirely from a Federal account.

The Commission bases its allowance of retroactive treatment of combined Federal and non-federal fundraising costs on previous advisory opinions issued with respect to the allocation regulations which were prescribed on October 3, 1990, and which took effect at the beginning of 1991. Such opinions permitted retroactive changes in formulae used for administrative costs or generic voter drives after the occurrence of a mistake or an intervening event. See Advisory Opinions 1991-25 and 1991-15. For example, the Commission has permitted retroactive application by a state committee of a ballot composition formula for administrative costs where the initial formula was based on a "good faith miscalculation" and had resulted in transfers of non-federal funds to the Federal account in amounts that were lower than the permissible share of joint expenditures. Advisory Opinion 1991-15. The Commission's decisions to allow specific retroactive changes recognize that the allocation regulations represent significant revisions to past practice and require a brief period of adjustment, i.e., the current election cycle, by political committees acting in good faith.

In Advisory Opinions 1991-25 and 1991-15, the Commission permitted retroactive changes only within a window of thirty days from the issuance of the advisory opinion. This appeared consistent with the allocation rules' time frame for a committee's non-federal account to reimburse a Federal account for its share of joint expenditures, as well as the time frame for a connected organization to reimburse its separate segregated fund for administrative costs that have been paid by the SSF. See 11 CFR 106.5(g)(2)(ii)(B) and 114.5(b)(3). Accordingly, the DNC has a thirty day period from the date of the issuance of this opinion to make the necessary reallocations, and those reallocated amounts must be included in the DNC's next report required to be filed after the adjustments are made.

You should report to the Commission by explanatory letter your calculation of what the administrative and fundraising transfers would have been if the salaries for mixed events had been treated as fundraising costs. This letter should list the fundraising salary and benefit component of each administrative transfer. For each transfer you propose to adjust, you should also disclose what the revised administrative and fundraising transfer totals would be, including the amounts for each fundraising event or program. You should also provide the total figure the

non-federal account has underpaid (or overpaid in the case of salary payments attributable to a solely Federal event) the Federal account, and reflect the transfer on line 18 of your Detailed Summary Page.

You will also need to attach to the letter a revised H4 Schedule to show the new allocated amounts for staff salary paid to your fundraising staff with respect to each event or program. You should indicate additional and changed entries with an asterisk. Sample forms illustrating hypothetical reports as originally submitted and as adjusted are attached.

This response constitutes an advisory opinion concerning application of the Act, or regulations prescribed by the Commission, to the specific transaction or activity set forth in your request. See 2 U.S.C. 437f.

Sincerely,

(signed)

Joan D. Aikens  
Chairman for the Federal Election Commission

Enclosures (AOs 1991-25 and 1991-15)

#### ENDNOTES

1/ You state that, until the request, you had interpreted fundraising expenses to include only "food, catering, rentals, etc."

2/ Normally, the committee estimates this ratio prior to each program or event, based on the committee's reasonable prediction of its Federal and non-federal revenue for the program or event. The committee adjusts its ratio following each such event to reflect the actual ratio of funds received and if the non-federal account has paid more than its share, then the necessary transfers will be made from the Federal account, and the adjustments will be noted in the report for the period in which the program or event occurred. 11 CFR 106.5(f). Your proposal for retroactive allocation would, of course, not require the use of the original estimates.

**REPORTS AS INITIALLY SUBMITTED (4 PAGES)**

SCHEDULE H1  
effective 11911

**METHOD OF ALLOCATION FOR SHARED FEDERAL  
AND NON-FEDERAL ADMINISTRATIVE EXPENSES  
AND GENERIC VOTER DRIVE COSTS**

NAME OF COMMITTEE

**DEMOCRATIC NATIONAL COMMITTEE**

**NATIONAL PARTY COMMITTEES**

FIXED FEDERAL PERCENTAGE (CHECK THE APPROPRIATE LINE AND ENTER % IN BOX TO RIGHT) ..... **60** %  
 PRESIDENTIAL YEAR (65%)  
 ALL OTHER YEARS (60%)

**HOUSE AND SENATE PARTY CAMPAIGN COMMITTEES**

MINIMUM FEDERAL PERCENTAGE (65%) (IF CHECKED, ENTER 65% IN BOX TO RIGHT) ..... %  
 OR  
 FUNDS EXPENDED:  
 • ESTIMATED DIRECT CANDIDATE SUPPORT — FEDERAL ..... %  
 • ESTIMATED DIRECT CANDIDATE SUPPORT — NON-FEDERAL ..... %  
 ADJUSTMENTS TO FUNDS EXPENDED:  
 ACTUAL DIRECT CANDIDATE SUPPORT — FEDERAL ..... \$ ..... %  
 ACTUAL DIRECT CANDIDATE SUPPORT — NON-FEDERAL ..... \$

NOTE: FUNDS EXPENDED MUST BE USED IF THE FEDERAL PROPORTION IS GREATER THAN 65% IN ANY YEAR.

**SEPARATE SEGREGATED FUNDS AND NON-CONNECTED COMMITTEES**

FUNDS EXPENDED:  
 • ESTIMATED DIRECT CANDIDATE SUPPORT — FEDERAL ..... %  
 • ESTIMATED DIRECT CANDIDATE SUPPORT — NON-FEDERAL ..... %  
 ADJUSTMENTS TO FUNDS EXPENDED:  
 ACTUAL DIRECT CANDIDATE SUPPORT — FEDERAL ..... \$ ..... %  
 ACTUAL DIRECT CANDIDATE SUPPORT — NON-FEDERAL ..... \$

**STATE AND LOCAL PARTY COMMITTEES**

**BALLOT COMPOSITION**

CHECK ALL OFFICES APPEARING ON THE NEXT GENERAL ELECTION BALLOT:

	NUMBER OF POINTS
1. PRESIDENT ..... (1 POINT) .....	
2. U.S. SENATE ..... (1 POINT) .....	
3. U.S. CONGRESS ..... (1 POINT) .....	
4. SUBTOTAL — FEDERAL (ADD 1, 2, AND 3) .....	
5. GOVERNOR ..... (1 POINT) .....	
6. OTHER STATEWIDE OFFICE(S) ..... (1 OR 2 POINTS) .....	
7. STATE SENATE ..... (1 POINT) .....	
8. STATE REPRESENTATIVE ..... (1 POINT) .....	
9. LOCAL CANDIDATES ..... (1 OR 2 POINTS) .....	
10. SUBTOTAL — NON-FEDERAL (ADD 5, 6, 7, 8, AND 9) .....	
11. TOTAL POINTS (LINE 4 PLUS LINE 10) .....	

FEDERAL ALLOCATION = LINE 4 DIVIDED BY LINE 11 .....

ALLOCATION RATIOS

NAME OF COMMITTEE  
**DEMOCRATIC NATIONAL COMMITTEE**

ALLOCATION RATIOS FOR INDIVIDUAL FUNDRAISING EVENTS, EXEMPT ACTIVITIES, AND SHARED DIRECT CANDIDATE SUPPORT APPEARING ON THIS REPORT.

- Methods of allocation:
- I. FUNDRAISING activities are allocated using the "funds received method" where the federal proportion of expenses must equal the federal proportion of monies raised.
  - II. EXEMPT activities are allocated using the "time and space method" where the federal proportion of disbursements is based on the proportion of time or space devoted to federal candidates.
  - III. Shared DIRECT CANDIDATE support activities are allocated according to benefit expected to be derived, where the federal proportion of disbursements is based on the benefit derived by federal candidates from the activity.

NAME OF ACTIVITY OR EVENT	FEDERAL %	NON-FEDERAL %
<b>EAGLE FUNDRAISING LETTER</b> ACTIVITY IS: <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS: <input type="checkbox"/> NEW <input type="checkbox"/> REVISED <input checked="" type="checkbox"/> SAME AS PREVIOUSLY REPORTED	20	80
<b>CHAIRMAN'S GALA</b> ACTIVITY IS: <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS: <input type="checkbox"/> NEW <input type="checkbox"/> REVISED <input checked="" type="checkbox"/> SAME AS PREVIOUSLY REPORTED	20	80
NAME OF ACTIVITY OR EVENT  ACTIVITY IS: <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS: <input type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> SAME AS PREVIOUSLY REPORTED		
NAME OF ACTIVITY OR EVENT  ACTIVITY IS: <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS: <input type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> SAME AS PREVIOUSLY REPORTED		
NAME OF ACTIVITY OR EVENT  ACTIVITY IS: <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS: <input type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> SAME AS PREVIOUSLY REPORTED		
NAME OF ACTIVITY OR EVENT  ACTIVITY IS: <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS: <input type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> SAME AS PREVIOUSLY REPORTED		
NAME OF ACTIVITY OR EVENT  ACTIVITY IS: <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT <input type="checkbox"/> DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS: <input type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> SAME AS PREVIOUSLY REPORTED		

TRANSFERS FROM  
NON-FEDERAL ACCOUNTS

NAME OF COMMITTEE <b>DEMOCRATIC NATIONAL COMMITTEE</b>		TOTAL AMOUNT TRANSFERRED
NAME OF ACCOUNT <b>NON-FEDERAL ACCOUNT</b>	DATE OF RECEIPT <b>1-20-91</b>	<b>\$ 50,000</b>

	BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN./VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT	
i) Total Administrative/Voter Drive .....	<b>25,000</b>			
ii) Direct Fundraising (List Events-Amount for Each)				
a) <b>EAGLE LETTER</b>		<b>15,000</b>		
b) <b>CHAIRMAN'S GALA</b>		<b>10,000</b>		
c) _____				
d) _____				
e) Total Amount Transferred For Direct Fundraising .....		<b>25,000</b>		
iii) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)				
a) _____				
b) _____				
c) _____				
d) _____				
e) Total Amount Transferred For Exempt Activity/Direct Candidate Support .....				

NAME OF ACCOUNT	DATE OF RECEIPT	\$
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	BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN./VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT	
i) Total Administrative/Voter Drive .....				
ii) Direct Fundraising (List Events-Amount for Each)				
a) _____				
b) _____				
c) _____				
d) _____				
e) Total Amount Transferred For Direct Fundraising .....				
iii) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)				
a) _____				
b) _____				
c) _____				
d) _____				
e) Total Amount Transferred For Exempt Activity/Direct Candidate Support .....				

	TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN./VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DCS	
SUBTOTAL THIS PAGE .....				
TOTAL THIS PERIOD .....				

JOINT FEDERAL/NON-FEDERAL  
ACTIVITY SCHEDULE

NAME OF COMMITTEE

**DEMOCRATIC NATIONAL COMMITTEE**

A. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
<b>JOE WORKER</b>	<b>SALARY</b>	<b>1-20-91</b>	<b>1,000</b>	<b>600</b>	<b>400</b>
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ _____ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
B. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
<b>WENDY WORKER</b>	<b>SALARY</b>	<b>1-20-91</b>	<b>1,000</b>	<b>600</b>	<b>400</b>
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ _____ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
C. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ _____ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
D. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ _____ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
E. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ _____ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
F. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ _____ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE .....					
TOTAL THIS PERIOD (last page for each line only)(Fed. share to 21 a ; and non-Fed. share to 21 a ii) .....					
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for line 31 of the detailed summary page) .....					



EXPLANATORY LETTER

TO: Federal Election Commission  
Reports Analysis Division

FROM: Democratic National Committee

RE: Adjustments in Accordance with AO 1992-2

The DNC adjusts its 1991 H3 Reports in the following way to reflect fundraising salaries as a direct fundraising cost instead of an administrative cost:

January 20, 1991:

Administrative transfer contained \$400 in fundraising salaries.

Adjusted transfers are:

Administrative \$24,600	Fundraising	
	(a) Eagle Letter -	15,400
	(b) Chairman's Gala -	10,400
	FR Total (As Adjusted)	\$25,800

[The letter would continue for each transfer that would change.]

Total year to date under-transferred: \$

Adjusted H4 schedules are enclosed.

ADJUSTMENT

NAME OF COMMITTEE

DEMOCRATIC NATIONAL COMMITTEE

A. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
* JOE WORKER	EAGLE LETTER - SALARY	1-20-91	500	100	400
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
B. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
* JOE WORKER	CHAIRMAN'S GALA - SALARY	1-20-91	500	100	400
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
C. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
WENDY WORKER	SALARY	1-20-91	1,000	600	400
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
D. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
E. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
F. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE .....					
TOTAL THIS PERIOD (last page for each line only)(Fed. share to 21 a i and non-Fed. share to 21 a ii) .....					
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for line 31 of the detailed summary page) .....					