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FEDERAL ELECTION  
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OCT 14 9 54 AM '99



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

OCT 14 1999

**MEMORANDUM**

**SENSITIVE**

TO: The Commission

FROM: Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner *hlp*  
Associate General Counsel

SUBJECT: RAD Referrals #97L-24A & #97L-24B - Distribution of RFAI responses

In connection with the First General Counsel's Report in RAD Referrals #97L-24A and #97L-24B, dated September 23, 1999, there has been a request for a copy of the responses to Requests for Additional Information referred to in the Report. This Office is now circulating seven responses to RFAs, three from the Hollywood Women's Political Committee and four from the DNC.

Attachment

Staff Assigned: Tara D. Meeker

FEB 13 11 51 AM '97

Hollywood Women's Political Committee  
444 S. Occidental Blvd., #421  
Los Angeles, CA 90057

February 7, 1997

Jennifer Wall  
Federal Election Commission  
Washington, DC 20463

Re: October Quarterly Report  
#C00188979

Dear Ms. Wall:

This is in response to your request for additional information regarding the event reimbursement from the DNC Services Corporation. The actual reimbursements totalled \$309,129.71. The dates of these reimbursements are as follows:

9/9/96	288,143.00
10/9/96	17,702.96
11/6/96	1,265.00
11/29/96	2,018.75

Attached is a list of all expenditures pertaining to the event. The expenses total \$311,961.85.

If you need additional information, please contact me. Thank you for your assistance in this matter.

Sincerely,



Kinde Durkee  
Hollywood Women's Political Committee

**Presidential Event: Paid-to-Date**  
1/1/96 Through 1/10/97

Date	Acct	Num	Description	Memo	Categ...	✓	Amount
<b>Inc/Exp</b>							
<b>Expenses</b>							
<b>103-Phone/Fax</b>							
9/18/96	HWPC 1996	12588	AT&T	Teleconference: Presidential E	103/23		-140.99
9/25/96	HWPC 1996	12615	Lara Berghold		103/23		-88.01
<b>Total 103-Phone/Fax</b>							<b>-229.00</b>
<b>104-Postage</b>							
6/25/96	HWPC 1996	12314	Abbey Mailing Service	Event Mailing:Presidential Gala	104/23		-1,600.00
<b>Total 104-Postage</b>							<b>-1,600.00</b>
<b>112-Event/Meeting Expenses</b>							
8/30/96	HWPC 1996	12456	Debi Karolewski	Assoc Prod Partial Pymt	112/23		-2,500.00
8/30/96	HWPC 1996	12457	Kelly Hommon	Producer Partial Pymt	112/23		-7,500.00
9/4/96	HWPC 1996	12486	Screenland Studios	Studio Rental: Presidential Eve	112/23		-225.00
9/4/96	HWPC 1996	12487	In-House Productions	Presidential Event: Prod Costs	112/23		-12,192.74
9/4/96	HWPC 1996	12488	In-House Productions	Presidential Event: Prod Costs	112/23		-2,000.00
9/5/96	HWPC 1996	12489	Deborah Nelson	Wardrobe Standby: Presidential	112/23		-250.00
9/5/96	HWPC 1996	12490	Obie Lighting	Lighting Equip: Presidential	112/23		-7,500.00
9/5/96	HWPC 1996	12491	Obie Lighting	Lighting Equip: Presidential	112/23		-7,500.00
9/5/96	HWPC 1996	12492	Show Power, Inc.	Generator Rental: Presidential	112/23		-3,000.00
9/5/96	HWPC 1996	12493	Andrea's Craft Service	Equip Rental: Presidential	112/23		-375.00
9/5/96	HWPC 1996	12494	Kelly Kidneigh	Cash: food/Presidential	112/23		-1,775.00
9/5/96	HWPC 1996	12495	Brown United	Stage Rentals: Presidential	112/23		-13,500.00
9/5/96	HWPC 1996	12496	Brown United	Stage Rentals: Presidential	112/23		-13,500.00
9/5/96	HWPC 1996	12497	J & S Express	Mobile Production Office: Pres.	112/23		-1,665.00
9/5/96	HWPC 1996	12498	J & S Express	Mobile Production Office: Pres.	112/23		-1,664.00
9/6/96	HWPC 1996	12501	Kelly Hommon	Producer Final Pymt	112/23		-7,500.00
9/6/96	HWPC 1996	12502	Debi Karolewski	Assoc Prod Final Pymt	112/23		-2,500.00
9/6/96	HWPC 1996	12551	In-House Productions	Presidential Event: Prod Costs	112/23		-7,707.26
9/9/96	HWPC 1996	12554	Chris Lamb	20 Walkies: Presidential	112/23		-480.00
9/9/96	HWPC 1996	12556	Studio Instrument Re...	Music Stands: Presidential	112/23		-175.00
9/9/96	HWPC 1996	12557	Studio Instrument Re...	Instrument Rentals	112/23		-1,265.00
9/9/96	HWPC 1996	12558	Studio Instrument Re...	Instrument Rentals	112/23		-1,265.00
9/9/96	HWPC 1996	12559	Vari * Lite	Light Equip Rentals: President	112/23		-3,250.00
9/9/96	HWPC 1996	12560	Denise Wheeler's Fil...	Transportation/Parking Permits	112/23		-246.00
9/9/96	HWPC 1996	12562	Castex Rentals	Rentals: Chairs, Etc.	112/23		-436.00
9/9/96	HWPC 1996	12563	Andy Brauer Studio ...	Cartage: Presidential Event	112/23		-708.75
9/9/96	HWPC 1996	12564	Andy Brauer Studio ...	Cartage: Presidential Event	112/23		-607.50
9/9/96	HWPC 1996	12565	Deluxe Catering	Crew Catering: Presidential	112/23		-2,815.00
9/9/96	HWPC 1996	12566	Deluxe Catering	Crew Catering: Presidential	112/23		-2,814.00
9/9/96	HWPC 1996	12567	Claire Brothers Audi...	Sound Services: Presidential	112/23		-8,975.00
9/9/96	HWPC 1996	12568	Claire Brothers Audi...	Sound Services: Presidential	112/23		-8,975.00
9/9/96	HWPC 1996	12569	Schubert Systems Gr...	Audio Rental: Presidential Even	112/23		-1,750.00

11-01-97 10:00:00

## QUICKEN - Selected Accounts

Presidential Event: Paid-to-Date  
1/1/96 Through 1/10/97

Date	Acct	Num	Description	Memo	Categ...	✓	Amount
9/9/96	HWPC 1996	12570	Rebeca Longinoti	Petty Cash: Presidential	112/23		-3,000.00
9/10/96	HWPC 1996	12571	Pro Piano	Piano Rental: BJS Rehearsal	112/23		-784.81
9/10/96	HWPC 1996	12572	Pro Piano	Piano Rental: BJS	112/23		-1,244.88
9/10/96	HWPC 1996	12573	George & Goldberg ...	Scenic Treatments: 1st Pymt	112/23		-10,422.54
9/12/96	HWPC 1996	12575	Deluxe Catering	Crew Catering: Presidential	112/23		-2,478.29
9/25/96	HWPC 1996	12622	Production Payroll	P/R: Stg Mgr, PA's, Electrician	112/23		-5,221.13
9/25/96	HWPC 1996	12623	GLS Productions	18 Walkie Talkies: Pres Eve	112/23		-240.00
9/25/96	HWPC 1996	12624	MANPOWER	Heavy Laborers: Pres Event	112/23		-2,492.00
9/25/96	HWPC 1996	12625	Job Shop, Inc.	Manual Labor: Pres Event	112/23		-8,671.87
9/25/96	HWPC 1996	12626	Vari * Lite	Light Equip Rentals: President	112/23		-3,250.00
9/25/96	HWPC 1996	12627	Computer Prompting...	Monitors/Operators: Pres Eve	112/23		-2,132.00
9/25/96	HWPC 1996	12628	Deluxe Catering	Excess Meals: Presidential	112/23		-1,288.18
9/25/96	HWPC 1996	12629	Fred Saunders Produc...	Stage Hands: Presidential	112/23		-21,291.03
9/25/96	HWPC 1996	12630	Affordable Services ...	Presidential	112/23		-600.00
9/25/96	HWPC 1996	12631	Affordable Services ...	Presidential	112/23		-600.00
9/25/96	HWPC 1996	12632	City of Los Angeles	Parking Ticket: Presidential	112/23		-40.00
9/25/96	HWPC 1996	12633	City of Los Angeles	Parking Ticket: Presidential	112/23		-40.00
9/25/96	HWPC 1996	12634	City of Los Angeles	Parking Ticket: Presidential	112/23		-40.00
9/25/96	HWPC 1996	12635	City of Los Angeles	Parking Ticket: Presidential	112/23		-40.00
9/25/96	HWPC 1996	12636	City of Los Angeles	Parking Ticket: Presidential	112/23		-40.00
9/25/96	HWPC 1996	12637	City of Los Angeles	Parking Ticket: Presidential	112/23		-40.00
9/25/96	HWPC 1996	12638	Charmel Green	Hair/Make-Up: Presidential	112/23		-250.00
9/25/96	HWPC 1996	12639	Drum Paradise	Cartage BJS (Drummer)	112/23		-1,349.00
9/25/96	HWPC 1996	12640	Henry De La Rosa	Stage Mgr: Presidential	112/23		-850.00
9/25/96	HWPC 1996	12641	Plantation Coffee Ser...	Bottled Water for Crew	112/23		-177.90
9/25/96	HWPC 1996	12642	Andy Brauer Studio ...	Guitar Teching/Stage Help: Pres	112/23		-400.00
9/25/96	HWPC 1996	12643	J & S Motor Express	Phone Bill: Presidential	112/23		-141.00
9/25/96	HWPC 1996	12644	Amore Studio Cartage	Cartage: Presidential	112/23		-455.00
9/25/96	HWPC 1996	12645	Amora Studio Cartage	Cartage: Presidential	112/23		-600.00
10/2/96	HWPC 1996	12663	Sabron, Inc.	Presidential Event	112/23		-23,564.73
10/2/96	HWPC 1996	12664	J & R Film	Presidential Event	112/23		-315.17
10/2/96	HWPC 1996	12665	Synthesizer Systems ...	Presidential Event	112/23		-330.00
10/2/96	HWPC 1996	12666	Show Power, Inc.	Electrical Permit: Presidential	112/23		-202.65
10/2/96	HWPC 1996	12667	Regal Rents	HWPC Rentals: Presidential E...	112/23		-377.57
10/2/96	HWPC 1996	12668	Lorenz Germaine	Stucco and Hair: Presidential	112/23		-300.00
10/2/96	HWPC 1996	12669	Janet Kagan	Presidential Event	112/23		-250.00
10/2/96	HWPC 1996	12670	Vogler Audio Media	Presidential Event	112/23		-600.00
10/2/96	HWPC 1996	12671	Patty Bolter	Presidential Event	112/23		-250.00
10/2/96	HWPC 1996	12672	Pamela Grossbart	Presidential Event	112/23		-250.00
10/2/96	HWPC 1996	12673	Design FX Audio	Presidential Event	112/23		-95.00
10/2/96	HWPC 1996	12674	Nice Guys Limo	Poundstone Limo: Presidential	112/23		-335.81
10/15/96	HWPC 1996	12700	American Express		112/23		-1,162.00
11/6/96	HWPC 1996	12798	LPC Insurance	Inv # 03215 031 212 Presidentia	112/23		-75.00
11/25/96	HWPC 1996	12826	Peter Morse Producti...	Expenses: Presidential Event	112/23		-1,147.42
1/8/97	HWPC 1997	12860	Brown United	Inv # 00001927	112/23		-500.00
1/8/97	HWPC 1997	12861	Show Power, Inc.	Inv #60990	112/23		-1,294.80
1/8/97	HWPC 1997	12862	Sony Pictures Studio...	Inv # 234522	112/23		-2,788.53
1/8/97	HWPC 1997	12863	Airwaves Cellular	Inv # 06419	112/23		-27.60
1/8/97	HWPC 1997	12864	Michael Jacobs PHot...	Inv #4130	112/23		-980.00
1/8/97	HWPC 1997	12905	Dubs Incorporated	Inv # 1101813 & 1102278	112/23		-59.54

## QUICKEN - Selected Accounts

Presidential Event: Paid-to-Date  
1/1/96 Through 1/10/97

Date	Acct	Num	Description	Memo	Categ...	✓	Amount
<b>Total 112-Event/Meeting Expenses</b>							<b>-229,701.70</b>
<b>113-Travel &amp; Entertainment</b>							
11/6/96	HWPC 1996	12795	Designs by David		113/23		-133.25
<b>Total 113-Travel &amp; Entertainment</b>							<b>-133.25</b>
<b>116-Fed Ex/Messenger</b>							
9/18/96	HWPC 1996	12599	Accurate Express		116/23		-68.25
11/6/96	HWPC 1996	12799	Federal Express		116/23		-44.50
1/8/97	HWPC 1997	12877	Accurate Express	Presidential Event	116/23		-53.25
<b>Total 116-Fed Ex/Messenger</b>							<b>-166.00</b>
<b>122-Misc.</b>							
9/6/96	HWPC 1996	12550	Alan Mandel Corp	Program Writing: Presidential	122/23		-1,500.00
9/10/96	HWPC 1996	12574	Michael Jacobs Phot...	Photographer: Deposit (1/2)	122/23		-375.00
9/12/96	HWPC 1996	12576	Production Payroll	Children's Choir P/R: President	122/23		-9,814.50
9/16/96	HWPC 1996	12577	Tim Lamb	Stage Mgr/Presidential	122/23		-2,500.00
9/16/96	HWPC 1996	12578	Karen Gaul	Production Coordinator: Pres	122/23		-2,500.00
9/16/96	HWPC 1996	12579	GLS Productions	Production Consultant: Presiden	122/23		-12,000.00
9/17/96	HWPC 1996	12580	Eagles Touring Com...	Talent Expenses: Presidential	122/23		-50,937.00
9/18/96	HWPC 1996	12583	Lisa Presta	Reimbursement: Presidential	122/23		-130.40
9/18/96	HWPC 1996	12584	Michael Jacobs Phot...	Photographer: Balance	122/23		-375.00
<b>Total 122-Misc.</b>							<b>-80,131.90</b>
<b>Total Expenses</b>							<b>-311,961.85</b>
<b>Total Inc/Exp</b>							<b>-311,961.85</b>

**JULES GLAZER**  
BUSINESS MANAGEMENT

Attachment #15  
RECEIVED  
444 S. OCCIDENTAL BLVD. SUITE 421  
LOS ANGELES, CA 90057  
FEDERAL ELECTION COMMISSION MAIL ROOM

(213) 384-7030

FAX: (213) 384-5548

APR 11 12 39 PM '97

77-731 LOS ARBOLES

LA QUINTA, CALIFORNIA 92253

(619) 564-4972

March 7, 1997

Jennifer K. Wall  
Reports Analysis Division  
Federal Election Commission  
Washington, DC 20463

Re: Hollywood Women's Political Committee  
#C00188979

Dear Ms. Wall:

This is in regards to your letter regarding the receipts received from the DNC Services Corp Victory '96 - Federal by the Hollywood Women's Political Committee.

It was our understanding that these receipts were drawn from federal funds and therefore permissible for us to accept. We request additional time to research this issue further based upon the information contained in your letter.

We will do everything that is required to deal with these receipts in an acceptable and proper manner. Thank you for your consideration in this matter.

Sincerely,



Kinde Durkee  
Hollywood Women's Political Committee

**JUSTICE MATTERS INC**RECEIVED  
FEDERAL ELECTION  
COMMISSION MAIL ROOM**BETH FOUNTAIN, ATTORNEY AT LAW\***  
**1508 N. WAKEFIELD STREET • ARLINGTON, VA 22207****MEMORANDUM**

**TO:** Jennifer K Wall, Reports Analyst

**FROM:** Beth Fountain *BF*

**DATE:** June 3, 1997

**RE:** Hollywood Women's Political Committee ("HWPC")--  
Response to your February 21, 1997 Letter

Thank you for taking the time to speak with me last week. As I stated, I am an attorney representing the HWPC. HWPC approached me two weeks ago regarding another legal matter. In the course of doing that work, I became aware of the above referenced letter from you to HWPC. My telephone call to you was designed to let you know that I had just become aware of this issue and intended to respond on behalf of HWPC. As a point of information, the HWPC had been under the apparently incorrect impression that another attorney was in contact with you to attempt to resolve this matter.

Your letter states that transfers made by the DNC Services Corporation Victory '96 Federal to HWPC were "prohibited by 11 CFR 102.5 (a)(1)(i)."

Please be informed that HWPC saw itself as little more than a vendor for the "Los Angeles National Presidential Gala" held on September 12, 1996. The enclosed itemized expense report reflects that all funds received by HWPC were spent for the production of the Gala. No funds were paid to candidates or campaigns, either federal or nonfederal.

In addition, until HWPC received your letter, no one at that Committee had any indication that any of the funds received by HWPC were from other than federal sources. As the enclosed copies of the checks from the DNC show, all those checks were drawn off their federal account. The response card for attendance at the Gala clearly indicated that contributions were intended for support of federal campaigns. HWPC never received nor distributed any of the funds raised at the Gala.

The CFR subsection you cite may well prohibit the DNC from making transfers from its nonfederal account to its federal account. However, HWPC was not aware of any such transfers and the HWPC reasonably relied upon the DNC's representations, via the checks it sent to HWPC, that the funds transferred to HWPC were exclusively federal funds. HWPC only maintains a federal account and would not have agreed to accept any funds that it knew were from mixed federal and nonfederal sources.

I hope this explanation and the attachments hereto are adequate to resolve the issue you raised in you February 21, 1997 letter. I will be out of the country for the next week, but would be happy to respond to any further questions or requests for information upon my return.



# Expenses

## HWPC Itemized Category Report 1996 1/1/96 Through 12/31/96

Date	Num	Description	Memo	Category	✓	Amount
<b>Inc/Exp</b>						
<b>Expenses</b>						
<b><u>103-Phone/Fax</u></b>						
9/18/96	12588	AT&T	Teleconference: Presidential E	103/23		-140.99
9/25/96	12615	Lara Berghold		103/23		-88.01
<b>Total 103-Phone/Fax</b>						<b>-229.00</b>
<b><u>104-Postage</u></b>						
6/25/96	12314	Abbey Mailing Service	Event Mailing:Presidential Gala	104/23		-1,600.00
<b>Total 104-Postage</b>						<b>-1,600.00</b>
<b><u>112-Event/Meeting Expenses</u></b>						
8/30/96	12456	Debi Karolewski	Assoc Prod Partial Pymt	112/23		-2,500.00
8/30/96	12457	Kelly Hommon	Producer Partial Pymt	112/23		-7,500.00
9/4/96	12486	Screenland Studios	Studio Rental: Presidential Eve	112/23		-225.00
9/4/96	12487	In-House Productions	Presidential Event: Prod Costs	112/23		-12,192.74
9/4/96	12488	In-House Productions	Presidential Event: Prod Costs	112/23		-2,000.00
9/5/96	12489	Deborah Nelson	Wardrobe Standby: Presidential	112/23		-250.00
9/5/96	12490	Obie Lighting	Lighting Equip: Presidential	112/23		-7,500.00
9/5/96	12491	Obie Lighting	Lighting Equip: Presidential	112/23		-7,500.00
9/5/96	12492	Show Power, Inc.	Generator Rental: Presidential	112/23		-3,000.00
9/5/96	12493	Andrea's Craft Service	Equip Rental: Presidential	112/23		-375.00
9/5/96	12494	Kelly Kidneigh	Cash: food/Presidential	112/23		-1,775.00
9/5/96	12495	Brown United	Stage Rentals: Presidential	112/23		-13,500.00
9/5/96	12496	Brown United	Stage Rentals: Presidential	112/23		-13,500.00
9/5/96	12497	J & S Express	Mobile Production Office: Pres.	112/23		-1,665.00
9/5/96	12498	J & S Express	Mobile Production Office: Pres.	112/23		-1,664.00
9/6/96	12501	Kelly Hommon	Producer Final Pymt	112/23		-7,500.00
9/6/96	12502	Debi Karolewski	Assoc Prod Final Pymt	112/23		-2,500.00
9/6/96	12551	In-House Productions	Presidential Event: Prod Costs	112/23		-7,707.26
9/9/96	12554	Chris Lamb	20 Walkies: Presidential	112/23		-480.00
9/9/96	12556	Studio Instrument Rentals	Music Stands: Presidential	112/23		-175.00
9/9/96	12557	Studio Instrument Rentals	Instrument Rentals	112/23		-1,265.00
9/9/96	12558	Studio Instrument Rentals	Instrument Rentals	112/23		-1,265.00
9/9/96	12559	Vari * Lite	Light Equip Rentals: President	112/23		-3,250.00
9/9/96	12560	Denise Wheeler's Film Permits	Transportation/Parking Permits	112/23		-246.00
9/9/96	12562	Castex Rentals	Rentals: Chairs, Etc.	112/23		-436.00
9/9/96	12563	Andy Brauer Studio Rentals	Cartage: Presidential Event	112/23		-708.75
9/9/96	12564	Andy Brauer Studio Rentals	Cartage: Presidential Event	112/23		-607.50
9/9/96	12565	Deluxe Catering	Crew Catering: Presidential	112/23		-2,815.00
9/9/96	12566	Deluxe Catering	Crew Catering: Presidential	112/23		-2,814.00
9/9/96	12567	Claire Brothers Audio Enterp...	Sound Services: Presidential	112/23		-8,975.00
9/9/96	12568	Claire Brothers Audio Enterp...	Sound Services: Presidential	112/23		-8,975.00
9/9/96	12569	Schubert Systems Group	Audio Rental: Presidential Even	112/23		-1,750.00

**HWPC Itemized Category Report 1996**  
1/1/96 Through 12/31/96

Date	Num	Description	Memo	Category	✓	Amount
9/9/96	12570	Rebeca Longinotti	Petty Cash: Presidential	112/23		-3,000.00
9/10/96	12571	Pro Piano	Piano Rental: BJS Rehearsal	112/23		-784.81
9/10/96	12572	Pro Piano	Piano Rental: BJS	112/23		-1,244.88
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9/12/96	12575	Deluxe Catering	Crew Catering: Presidential	112/23		-2,478.29
9/25/96	12622	Production Payroll	P/R: Stg Mgr, PA's, Electrician	112/23		-5,221.13
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9/25/96	12624	MANPOWER	Heavy Laborers: Pres Event	112/23		-2,492.00
9/25/96	12625	Job Shop, Inc.	Manual Labor: Pres Event	112/23		-8,671.87
9/25/96	12626	Vari • Lite	Light Equip Rentals: President	112/23		-3,250.00
9/25/96	12627	Computer Prompting Services	Monitors/Operators: Pres Eve	112/23		-2,132.00
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9/25/96	12629	Fred Saunders Production Ser...	Stage Hands: Presidential	112/23		-21,291.03
9/25/96	12630	Affordable Services Agency	Presidential	112/23		-600.00
9/25/96	12631	Affordable Services Agency	Presidential	112/23		-600.00
9/25/96	12632	City of Los Angeles	Parking Ticket: Presidential	112/23		-40.00
9/25/96	12633	City of Los Angeles	Parking Ticket: Presidential	112/23		-40.00
9/25/96	12634	City of Los Angeles	Parking Ticket: Presidential	112/23		-40.00
9/25/96	12635	City of Los Angeles	Parking Ticket: Presidential	112/23		-40.00
9/25/96	12636	City of Los Angeles	Parking Ticket: Presidential	112/23		-40.00
9/25/96	12637	City of Los Angeles	Parking Ticket: Presidential	112/23		-40.00
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9/25/96	12639	Drum Paradise	Cartage BJS (Drummer)	112/23		-1,349.00
9/25/96	12640	Henry De La Rosa	Stage Mgr: Presidential	112/23		-850.00
9/25/96	12641	Plantation Coffee Service	Bottled Water for Crew	112/23		-177.90
9/25/96	12642	Andy Brauer Studio Rentals	Guitar Teching/Stage Help: Pres	112/23		-400.00
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10/2/96	12664	J & R Film	Presidential Event	112/23		-315.17
10/2/96	12665	Synthesizer Systems Technol...	Presidential Event	112/23		-330.00
10/2/96	12666	Show Power, Inc.	Electrical Permit: Presidential	112/23		-202.65
10/2/96	12667	Regal Rents	HWPC Rentals: Presidential E...	112/23		-377.57
10/2/96	12668	Lorenz Germaine	Streisand Hair: Presidential	112/23		-300.00
10/2/96	12669	Janet Kagan	Presidential Event	112/23		-250.00
10/2/96	12670	Vogler Audio Media	Presidential Event	112/23		-600.00
10/2/96	12671	Patty Bolter	Presidential Event	112/23		-250.00
10/2/96	12672	Pamela Grossbart	Presidential Event	112/23		-250.00
10/2/96	12673	Design FX Audio	Presidential Event	112/23		-95.00
10/2/96	12674	Nice Guys Limo	Poundstone Limo: Presidential	112/23		-335.81
10/1...	12700	American Express		112/23		-1,162.00
11/6/96	12798	LFC Insurance	Inv # 03215 031 212 Presidentia	112/23		-75.00
11/2...	12826	Peter Morse Productions, Inc.	Expenses: Presidential Event	112/23		-1,147.42
Total 112-Event/Meeting Expenses						-224,051.23

113-Travel & Entertainment

11/6/96	12795	Designs by David		113/23		-133.25
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**HWPC Itemized Category Report 1996**  
1/1/96 Through 12/31/96

Date	Num	Description	Memo	Category	✓	Amount
Total 113-Travel & Entertainment						-133.25
<u>116-Fed Ex/Messenger</u>						
9/18/96	12599	Accurate Express		116/23		-68.25
11/6/96	12799	Federal Express		116/23		-44.50
Total 116-Fed Ex/Messenger						-112.75
<u>122-Misc.</u>						
9/6/96	12550	Alan Mandel Corp	Program Writing: Presidential	122/23		-1,500.00
9/10/96	12574	Michael Jacobs Photojournal...	Photographer: Deposit (1/2)	122/23		-375.00
9/12/96	12576	Production Payroll	Children's Choir P/R: President	122/23		-9,814.50
9/16/96	12577	Tim Lamb	Stage Mgr/Presidential	122/23		-2,500.00
9/16/96	12578	Karen Gault	Production Coordinator: Pres	122/23		-2,500.00
9/16/96	12579	GLS Productions	Production Consultant: Presiden	122/23		-12,000.00
9/17/96	12580	Eagles Touring Company	Talent Expenses: Presidential	122/23		-50,937.00
9/18/96	12583	Lisa Presta	Reimbursement: Presidential	122/23		-130.40
9/18/96	12584	Michael Jacobs Photojournal...	Photographer: Balance	122/23		-375.00
Total 122-Misc.						-80,131.90
Total Expenses						-306,258.13
Total Inc/Exp						-306,258.13

- ☐ Yes, I will attend the Los Angeles National Presidential event. Enclosed is my contribution of \$\_\_\_\_\_.
- ☐ Please reserve \_\_\_\_\_ tickets at \$12,500 each for dinner and VIP concert tickets.
- ☐ Please reserve \_\_\_\_\_ tickets at \$5,000 each for the private reception and preferred seating concert tickets.
- ☐ Please reserve \_\_\_\_\_ tickets at \$2,500 each for the concert.
- ☐ Sorry, I cannot attend, but to show my support, enclosed is a contribution in the amount of \$\_\_\_\_\_.

For information contact Levy/Pearl at 310-201-5033.

Contributions to this committee are not tax deductible for Federal income tax purposes.

Paid for by Victory '98, a joint fundraising project of the Clinton/Gore '98 General Election Legal and Accounting Compliance Fund (Clinton/Gore '98 GELAC) and the Democratic National Committee. Contributions from individuals and partnerships that meet the limitations of federal election law will be divided between Clinton/Gore '98 GELAC (10%) and the Democratic National Committee (90%). Contributions from Federal Political Action Committees will be allocated solely to the Democratic National Committee. Contributions that do not meet the prohibitions and limitations of federal election law shall be allocated solely to the Democratic National Committee.

Any contributor may designate his or her contributions for a particular participant. The allocation formula for federal contributions may change if any contributor makes a contribution that, when allocated, would exceed the amount he or she may lawfully give to any participant. Any contribution which, on its face, or when aggregated with prior contributions, exceeds federal limits, will be redesignated to the non-federal account of Victory '98, and shall be allocated solely to the Democratic National Committee.

All contributions to Clinton/Gore '98 GELAC will be used solely for legal and accounting services to ensure compliance with federal law. Federal law prohibits private contributions from being used for the candidate's general election.

I have read this fundraising notice, and I understand the limitations placed upon the portion of my contribution that is allocable to Clinton/Gore '98 GELAC. Furthermore, I hereby give permission to Victory '98 to reallocate any contribution which may exceed the federal limits to a non-federal account.

Signature \_\_\_\_\_

Please see reverse for important information.

145

WESTWOOD OFFICE  
WESTERN BANK  
LOS ANGELES, CALIFORNIA 90024

DATE 9-9-96

CURRENCY	COIN	US EACH CHECK	DOLLARS	CENTS
			288,143	-
			15-1201	288,143

TOTAL  
ITEMSPLEASE BE SURE ALL ITEMS  
ARE PROPERLY ENDORSED.

TOTAL DEPOSIT

DEPOSITS MAY NOT BE AVAILABLE  
FOR IMMEDIATE WITHDRAWAL.

HOLLYWOOD WOMEN'S  
POLITICAL COMMITTEE  
FEDERAL ACCOUNT

⑈122233276⑈ 691675793⑈ 5120

CHECK NO. : CHECK DATE : VENDOR NO.

000271

09/06/96

DNC SERVICES CORPORATION  
VICTORY '96 - FEDERAL

430 South Capitol Street, S.E.  
Washington, D.C. 20003

NationsBank

NationsBank of D.C., N.A.

CHECK NO. 000271

15/1201  
0222

CHECK AMOUNT

\$288,143.00

Two Hundred Eighty Eight Thousand One Hundred Forty Three and .00/100\*\*

PAY  
TO THE  
ORDER OF Hollywood Women's Political Cmte.

*[Signature]*  
AUTHORIZED SIGNATURE  
*[Signature]*  
AUTHORIZED SIGNATURE

THE SECURITY FEATURES ON THIS DOCUMENT INCLUDE MICRO-PRINT SIGNATURE LINES.

⑈000271⑈ ⑈054001204⑈ 1933064756⑈

SEP 09 1996

PAY TO THE ORDER OF

WESTERN BANK  
LOS ANGELES, CA

⑈122233276⑈

FOR DEPOSIT ONLY

HOLLYWOOD WOMEN'S POLITICAL COMMITTEE  
FEDERAL ACCOUNT  
691⑈675793⑈

\$288,143-

HWPC  
#23

MUST BE  
Deposited  
Today

9/9

DATE 10-5-1996

CURRENCY	COIN	DOLLARS	CENTS
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**PLEASE  
ENTER  
YOUR**

**17,702.95**

**TOTAL DEPOSIT**  
**DEPOSITS MAY NOT BE AVAILABLE**  
**FOR IMMEDIATE WITHDRAWAL.**

12 222332761: 691675793" 5120

CHECK NO. 000355

**National Bank of D.C., N.A.**

431 South Capitol Street, S.E.  
Washington, D.C. 20003

15-1201  
C222

CHECK AMOUNT	
\$	17,702.96

HOLLYWOOD WOMEN'S POLITICAL  
COMMITTEE  
3679 MOTOR AVENUE, SUITE 300  
LOS ANGELES CA 90034

R. S. Blodgett  
 AUTHORIZED SIGNATURE  
 TREASURER  
 AUTHORIZED SIGNATURE

 THE SECURITY FEATURES ON THIS DOCUMENT INCLUDE MICRO-PRINT SIGNATURE LINES.

⑈000355⑈ 1:0540012041: 1933064756⑈

LOS ANGELES, CA  
01 7773377E-1  
FGR DESTROY ONLY

HOLLYWOOD WOMENS POLITICAL COMMITTEE  
FEDERAL ACCOUNT  
691-675793

HWPC- kd 10/9  
PRESIDENTIAL EVENT  
HWPC FEDERAL

Reimbursement  
past due \$17,702.<sup>96</sup>

LOS ANGELES, CALIFORNIA 90024

Attachment #17  
Page 9 of 11

TOTAL ITEMS 

PLEASE BE SURE ALL ITEMS  
ARE PROPERLY ENDORSED.

PLEASE  
ENTER  
TOTAL

1.265

**TOTAL DEPOSIT**  
DEPOSITS MAY NOT BE AVAILABLE  
FOR IMMEDIATE WITHDRAWAL

**HOLLYWOOD WOMENS  
POLITICAL COMMITTEE  
FEDERAL ACCOUNT**

41222332761: 6916757930 5120

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402 | 10/25/96 | HWPC

CHECK NO. 000402

**DNC SERVICES CORPORATION**  
**VICTORY '96 - FEDERAL**

**430 South Capitol Street, S.E.  
Washington, D.C. 20003**

15/1201  
0222

CHECK AMOUNT

**\$\*\*\*\*\*1,265.00**

ONE THOUSAND TWO HUNDRED SIXTY-FIVE AND 00/100 DOLLARS

H.W.P.C.  
3679 MOTOR AVE.  
SUITE 302  
LOS ANGELES

CA 90034

*[Signature]*  
\_\_\_\_\_  
A. J. [Signature]  
\_\_\_\_\_  
TREASURER  
\_\_\_\_\_  
AUTHORIZED SIGNATURE

**THE SECURITY FEATURES ON THIS DOCUMENT INCLUDE MICRO-PRINT SIGNATURE LINES.**

1100040211 0540012041 193306475611

NOV 06 1996

**PAY TO THE ORDER OF  
WESTERN BANK**

LOS ANGELES, CA

0517777327612

FOR OFFICIAL USE ONLY

**HOLLYWOOD WOMEN'S POLITICAL COMMITTEE**

FEDERAL ACCOUNT

696-675793

CONFIDENTIAL

posted

SA 1205 (2)

Presidential  
#23  
Federal

\$ 1,265.<sup>00</sup>

P.04

May-14-97 11:03A

WESTWOOD OFFICE  
WESTERN BANK  
LOS ANGELES, CALIFORNIA 90024

DATE 11-6 1996

CURRENCY	COIN	UNIT LICK EACH CHECK	DOLLARS	CENTS
115-1201			11265	-
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**TOTAL** 1

**ITEMS**

**PLEASE BE SURE ALL ITEMS ARE PROPERLY ENDORSED.**

PLEASE ENTER TOTAL	1.265	-
<b>TOTAL DEPOSIT</b> DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL.		

**HOLLYWOOD WOMENS  
POLITICAL COMMITTEE  
FEDERAL ACCOUNT**

1: 1 2 2 2 3 3 2 7 6 1: 6 9 1 6 7 5 7 9 3 0 5 1 2 0

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CHECK NO.	CHECK DATE	VENDOR NO.
402	10/25/96	HWPC

CHECK NO. 000402

**NationsBank**  
NationsBank of D.C., N.A.

**DNC SERVICES CORPORATION**  
**VICTORY '96 - FEDERAL**  
 430 South Capitol Street, S.E.  
 Washington, D.C. 20003

15'1201  
0222


ONE THOUSAND TWO HUNDRED SIXTY-FIVE AND 00/100 DOLLARS

CHECK AMOUNT

\$ \* \* \* \* 1,265.00

**PAY  
TO THE  
ORDER OF**

H.W.P.C.  
3679 MOTOR AVE.  
SUITE 302  
LOS ANGELES CA 90034

  
 \_\_\_\_\_  
 F. J. S. 12-29-52  
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 AUTHORIZED SIGNATURE  
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 TREASURER  
 \_\_\_\_\_  
 AUTHORIZED SIGNATURE

 THE SECURITY FEATURES ON THIS DOCUMENT INCLUDE MICRO-PRINT SIGNATURE LINES.

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NOV 06 1996

**PAY TO THE ORDER OF  
WESTERN BANK**

LOS ANGELES, CA  
12 2 2 2 2 2 2 2  
FOR DEPT. ONLY

HOLLYWOOD WOMEN'S POLITICAL COMMITTEE  
FEDERAL ACCOUNT  
694-675793

\$ 1,265.<sup>00</sup>

**DISMISSED**

posted after  
S. 1205, 10



Presidential  
Federal  
#23

CHECK NO.	CHECK DATE	VENDOR NO.
432	11/18/96	HOLL01

CHECK NO. 000432

**NationsBank**  
National Bank of D.C., N.A.

**DNC SERVICES CORPORATION**  
**VICTORY '96 - FEDERAL**  
430 South Capitol Street, S.E.  
Washington, D.C. 20003

15/1201  
0222

CHECK AMOUNT
\$****2,018.75

TWO THOUSAND EIGHTEEN AND 75/100 DOLLARS

PAY  
TO THE  
ORDER OF

HOLLYWOOD WOMEN'S POLITICAL  
COMMITTEE  
3679 MOTOR AVENUE, SUITE 300  
LOS ANGELES CA 90034

*[Signature]*  
AUTHORIZED SIGNATURE  
TREASURER  
AUTHORIZED SIGNATURE

☒ THE SECURITY FEATURES ON THIS DOCUMENT INCLUDE MICRO-PRINT SIGNATURE LINES.

⑈000432⑈ ⑆054001204⑆ ⑆933064756⑈

NOV 29 1996

PAY TO THE ORDER OF  
WESTERN BANK  
LOS ANGELES, CA  
⑆122233276⑆  
FOR DEPOSIT ONLY

HOLLYWOOD WOMEN'S POLITICAL COMMITTEE  
FEDERAL ACCOUNT  
691⑆675793⑈

1 HWPC-fed 11/29  
Federal 12  
\$6,000.00  
+ #23 (1 check)  
\$2,018.75  
-----  
posted clw \$8,018.75

# 8,018.75

**Democratic National Committee**REPORTS ANALYST  
Steve Crossman

National Chair ★ Governor Roy Romer, General Chair

MAR 27 4 39 PM '97

March 26, 1997

Ms. Debbie Manzano  
Reports Analyst  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

ID#: C00010603

RE: Response to letter of March 12, 1997 to Carol Pensky,  
Treasurer, DNC Services Corporation/Democratic National Committee.

Dear Ms. Manzano:

The DNC is in receipt of your letter of March 12, 1997. In this letter, you request clarification of the following item from our 1996 October Quarterly Report, which covered the period from July 1, 1996 through September 30, 1996:

1) You state a payment to the Hollywood Women's Political Caucus ("HWPC"), a federally registered political committee, in the amount of \$288,143.00 should not have been disclosed as an expenditure on Schedule H4. Rather, you attempt to characterize this transaction as a contribution from one political committee to another, and request that the DNC transfer the non-federal portion of this expenditure from its federal account to its non-federal account. Furthermore, you state that the amount paid in excess of \$5,000 exceeds the contribution limits of 2 U.S.C. § 441a(a).

- \* The DNC vehemently disagrees with the FEC's characterization of this transaction. This payment, as well as an additional payment in October, 1996, reflect a reimbursement for fundraising costs paid for by the Hollywood Women's Political Committee on behalf of the DNC. The payments made by HWPC reflect arms length transactions with commercial vendors on behalf of the DNC for a fundraising event held by the DNC in Los Angeles, CA on September 12, 1996. Payments by DNC to HWPC reflect dollar for dollar reimbursement for those costs, and were properly disclosed as allocable fundraising costs on Schedule H4 of the DNC's report. It is our understanding that HWPC, in amended reports, has disclosed the receipt of funds by the DNC as an "Offset to Expenditure" on Line 15 of its reports.

Ms. Debbie Manzano  
March 26, 1997  
Page Two

21-04-003-0007

The position of the FEC that these transfers constitute a contribution merely because the transaction is between two federally registered political committees is clearly at odds with FEC precedent. Specifically, in Advisory Opinion 1995-22, the Commission advised the Democratic Congressional Campaign Committee that it could disclose reimbursements from the Democratic Senatorial Campaign Committee on an ongoing basis, and that such transactions are disclosable as "Offsets to Expenditures." These expenditures made by the DCCC were originally allocated and disclosed on Schedule H4. Furthermore, it is our understanding that the DSCC reports these disbursements to the DCCC as allocable expenditures on Schedule H4. See Also MURS 2345, 2611 (Permitting federal candidates to reimburse party committees, as offsets, for expenditures made by the committee on behalf of those candidates). Thus, it is apparent that the Commission has consistently held that not all transfers between two federally registered political committees are, by definition, contributions. In this case, the DNC reimbursed, dollar for dollar, allocable fundraising expenditures which were paid for on behalf of the DNC by HWPC. Therefore, the DNC believes that this transaction was properly disclosed on Schedule H4, and that it was entitled to transfer funds from its non-federal account to its federal account to pay for the non-federal portion of this fundraising expense. 11 C.F.R. § 106.5.

If you have any further questions, please contact me at the address below.

Sincerely,



Bradley K. Marshall  
Assistant Treasurer

**Democratic National Committee**Steve Grossman, *National Chair* ★ Governor Roy Romer, *General Chair*

March 26, 1997

Ms. Debbie Manzano  
Reports Analyst  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

ID#: C00010603

RE: Response to letter of March 12, 1997 to Carol Pensky,  
Treasurer, DNC Services Corporation/Democratic National Committee.

Dear Ms. Manzano:

The DNC is in receipt of your letter of March 12, 1997. In this letter, you request clarification of the following items from our 1996 12 Day Pre-General Report, which covered the period from October 1, 1996 through October 16, 1996:

1) You state a payment to the Hollywood Women's Political Caucus ("HWPC"), a federally registered political committee, in the amount of \$17,702.96 should not have been disclosed as an expenditure on Schedule H4. Rather, you attempt to characterize this transaction as a contribution from one political committee to another, and request that the DNC transfer the non-federal portion of this expenditure from its federal account to its non-federal account. Furthermore, you state that the amount paid in excess of \$5,000 exceeds the contribution limits of 2 U.S.C. § 441a(a).

- \* The DNC vehemently disagrees with the FEC's characterization of this transaction. This payment, as well as an additional payment in September, 1996, reflect a reimbursement for fundraising costs paid for by the Hollywood Women's Political Committee on behalf of the DNC. The payments made by HWPC reflect arms length transactions with commercial vendors on behalf of the DNC for a fundraising event held by the DNC in Los Angeles, CA on September 12, 1996. Payments by DNC to HWPC reflect dollar for dollar reimbursement for those costs, and were properly disclosed as allocable fundraising costs on Schedule H4 of the DNC's report. It is our understanding that HWPC, in amended reports, has disclosed the receipt of funds by the DNC as an "Offset to Expenditure" on Line 15 of its reports.

Ms. Debbie Manzano  
March 26, 1997  
Page Two

21.04.403.0299

The position of the FEC that these transfers constitute a contribution merely because the transaction is between two federally registered political committees is clearly at odds with FEC precedent. Specifically, in Advisory Opinion 1995-22, the Commission advised the Democratic Congressional Campaign Committee that it could disclose reimbursements from the Democratic Senatorial Campaign Committee on an ongoing basis, and that such transactions are disclosable as "Offsets to Expenditures." These expenditures made by the DCCC were originally allocated and disclosed on Schedule H4. Furthermore, it is our understanding that the DSCC reports these disbursements to the DCCC as allocable expenditures on Schedule H4. See Also MURS 2345, 2611 (permitting federal candidates to reimburse party committees, as offsets, for expenditures made by the committee on behalf of those candidates). Thus, it is apparent that the Commission has consistently held that not all transfers between two federally registered political committees are, by definition, contributions. In this case, the DNC reimbursed, dollar for dollar, allocable fundraising expenditures which were paid for on behalf of the DNC by HWPC. Therefore, the DNC believes that this transaction was properly disclosed on Schedule H4, and that it was entitled to transfer funds from its non-federal account to its federal account to pay for the non-federal portion of this fundraising expense. 11 C.F.R. § 106.5.

2) You state that there is a contribution on Line 11(c) that does not appear to be from a federally registered political committee.

\* This contribution is, in fact, from a political committee, but was misreported due to a data entry error. A corrected Page 2 of Line 11(c) is enclosed.

3) You ask for clarification of all media expenditures made by the DNC on Schedule H4.

\* All media expenditures disclosed on Schedule H4 were for "generic" media. These media expenditures were not made on behalf of any specific federal candidate.

4) You ask that all in-kind contributions disclosed on Schedule H4 be cross referenced to its offsetting entry on Schedule H3.

\* Enclosed please find amended Pages H3 and H4 that cross-reference all allocable non-federal in-kind contributions received.

Ms. Debbie Manzano  
March 26, 1997  
Page Three

5) You ask that the DNC provide addresses for all vendors on Schedule H4 for which such addresses were omitted.

- \* Enclosed please find amended Schedules B and H4 for all omitted addresses for Lines 21(a) and (b).

6) You ask for clarification of the nature of refunds for the following vendors.

- \* W.A. Wilde Company - This refund represents an overpayment of postage for a direct mail solicitation. This company was, in fact, a subcontractor for Adams, Malchow & Hussey who was the ultimate vendor of the DNC. The vendor inadvertently refunded the overpayment directly to the DNC, rather than making payment back to Adams, Malchow & Hussey.

Corporate Entertainment Services, Inc. - This refund represents a refund for overpayment for production and consulting costs for a DNC fundraiser held in September of 1996. The original payment to this vendor is listed as payable to "CES" on our October Quarterly report.

7) You ask the DNC to provide certain missing information on Schedule D of our report.

- \* Enclosed please find an amended Schedule D which provides the missing information requested.

8) You ask for clarification of credits shown for certain vendors on Schedule D of our report.

- \* Archibald Allen Associates, Inc. - It was determined that this vendor, who was a subcontractor of another DNC vendor, charged the DNC in error. The credit reflects that this vendor was not due any payments from the DNC.
- \* Boomerang Studios - The credit listed for this vendor reflects a data entry error by DNC staff. An invoice for \$965.00 was entered twice. In fact, there was only one payment for \$965.00 due to this vendor.
- \* Romash Communications - This credit reflects the fact the DNC staff accidentally entered an invoice of the Convention Committee into the DNC accounting system. This expense was paid for by the 1996 Democratic National Convention Committee, Inc. Thus, the credit is a correction of the original data entry error.

21-04-403-0300

Ms. Debbie Manzano  
March 26, 1997  
Page Four

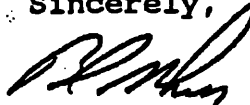
- \* Malchow & Company - This credit was disclosed in error. An amended Schedule Page 16 of D is enclosed. Also, a corresponding Schedule D is enclosed for the Post-General Report.

Also enclosed with this letter are the following amendments:

- 1) An amended Page 13 for Line 1 of Non-Federal Corporate. This amendment corrects an address for a donation by Boeing Corporation, which was previously listed the corporate contact as the donor.
- 2) Amended cover pages for the Post-General Report which carry forward corrections from prior reports.
- 3) Amended cover pages and Schedule B, Line 22 for the Year-End report which carry forward prior corrections, and disclose two transfers previously omitted from this report.

If you have any further questions, please contact me at the address below.

Sincerely,



Bradley K. Marshall  
Assistant Treasurer

21-04-403-0301

**Democratic National Committee**Steve Grossman, *National Chair* ★ Governor Roy Romer, *General Chair*RECEIVED  
FEDERAL ELECTION COMMISSION  
PUBLIC DISCLOSURE DIVISION

97 APR 21 AM 10:35

April 18, 1997

Mr. John D. Gibson  
Assistant Staff Director  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

RE: Letter to Carol Pensky of April 7, 1997, Treasurer of DNC  
Services Corporation/Democratic National Committee (#C00010603)

Dear Mr. Gibson:

The DNC is in receipt of your letter of April 7, 1997 to Carol Pensky regarding payments made by the DNC in the total amount of \$305,845.96 payable to the Hollywood Women's Political Committee ("HWPC"), for reimbursement of fundraising expenditures made on behalf of the DNC.

In your letter, you reject the DNC's contention that these expenditures were properly paid for by the DNC as allocable fundraising expenditures, and disclosed as "Offsets to Expenditures" by the Hollywood Women's Political Committee.

In your letter, you do not provide any basis for your determination other than the fact that the two entities involved are both federal political committees.

Your position in this matter ignores past FEC precedents, and would lead to the result of the acceptance of a federal in-kind contribution to the DNC in the amount of \$132,922.98 (50% of the fundraising costs less \$5,000 retained by HWPC less \$15,000 limit from HWPC to DNC).

Again, the payments made by HWPC reflect arms length transactions with commercial vendors on behalf of the DNC for a fundraising event held by the DNC in Los Angeles, CA on September 12, 1996. Payments by DNC to HWPC reflect dollar for dollar reimbursement for those costs, and were properly disclosed as allocable fundraising costs on Schedule H4 of the DNC's report.

You state in your letter that had the DNC paid vendors directly for these expenses they would have been lawful allocable expenses. However, since the expenses merely passed through a

21 "04" 493 "0302



21 04 103 0303

federal political committee, they somehow convert these transactions from lawful expenditures to unlawful contributions. As stated in our earlier letter, the FEC precedents stated therein stand for the proposition that the Commission should look at the nature of the transaction, and not at the entities who are involved in the transaction. Thus, the Commission has permitted party and candidate committees to transfer funds in connection with allocable activities to the federal account of another federal political committee without regard to source or contribution limitations. You attempt to distinguish these precedents by stating that since these cases involved party and candidate committees this situation is different. However, these precedents do not rest on what type of federal political committees involved that were involved in the transaction, rather, these precedents demonstrate that a federal committee may reimburse another federal committee as an "operating expenditure" for costs incurred on its behalf by another committee, even though such payments may exceed the established contribution limit between those committees, and those funds may include amounts from sources that are not permissible under the FECA (See also MUR 3716 (permitting a non-federal candidate to reimburse a federal political committee for its share of expenses in connection with a slate card mailer); Audit Division Report for Bush-Quayle '92 General Committee, Inc. (permitting publicly funded presidential candidate committee for general election to treat reimbursement payment for expenses to state party as "qualified campaign expenditures").

The Commission has placed the DNC in a Catch-22. Either these payments reflect an arms-length, dollar for dollar reimbursement for expenditures paid for by the DNC by the HWPC (in which case it is entitled to allocate these expenditures pursuant to 11 C.F.R. § 106.5), or the DNC will be forced by the Commission to accept an excessive in-kind contribution from the HWPC in the amount of \$137,922.98!

Therefore, the DNC urges you to reconsider your position regarding this matter. At this time, the DNC has no intention of requesting a refund of any payments made to HWPC, since such payments would lead to the impermissible acceptance of an excessive in-kind contribution by our committee. Furthermore, since the DNC believes that it was entitled to allocate these expenditures, it has no intention to request a refund of the non-federal portion of these expenditures.

If you have any questions regarding this matter, please contact me at the address below.

Sincerely,



Bradley K. Marshall  
Assistant Treasurer

**Democratic National Committee**

Steve Grossman, National Chair \* Governor Roy Roemer, General Chair

MAY 8 5 45 PM '97

May 8, 1997

Ms. Debbie Manzano  
Reports Analyst  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

ID#: C00010603

RE: Response to letters of April 23, 1997 to Carol Pensky,  
Treasurer, DNC Services Corporation/Democratic National Committee.

Dear Ms. Manzano:

The DNC is in receipt of your letters of April 23, 1997. In these letters, you request clarification of the following items from our 1996 30 Day Post-General Report, which covered the period from October 17, 1996 through November 25, 1996:

1) You state that a contribution from America Presents, Ltd., disclosed on Line 11(c), does not appear to be from a federally registered political committee.

- \* Please note that this contribution was transferred to the DNC's Non-Federal Corporate Account on December 4, 1996 (A copy of the Page from our Year-End report reflecting this transfer is enclosed).

2) You request that refunds disclosed on Line 28(a) be amended to reflect the original date and identity of each contribution refund listed on this Schedule.

- \* Enclosed, please find an amended Schedule B, Line 28(a) that includes this information.

3) You state that Column B for Lines 6(c), 7, 18, 19, 21(a)(ii), 21(c) and 30 appear to be incorrect.

- \* This error was corrected by the DNC in an amendment dated April 17, 1997.

Ms. Debbie Manzano  
May 8, 1997  
Page Two

4) You state that the amount disclosed on Line 11(a)(i) does not equal the amounts on the detailed summary pages. The DNC disclosed \$4,376,502.10 on its detailed summary page for this line. You state that the sum of the entries on Schedules A for this line total \$4,344,727.97.

- \* Please note that the following pages (p.p. 988, 1176, 1561-1580) appear to have been inadvertently omitted from the original report, and are included herein. The total amount for these pages is \$33,023.13. This brings the total amount for Line 11(a) to \$4,377,751.10.

5) You ask for clarification of the nature of refunds for the following vendors.

'96 DNCC - These payments reflect reimbursement by the DNCC for payroll expenses incurred by the DNC on behalf of the DNCC.

Direct Mail Management - This payment reflects a refund for an overpayment of postage for direct mail fundraising.

Typed Letters Corp. - This payment reflects a refund for an overpayment of postage for direct mail fundraising.

6) You state that the beginning balances for certain vendors do not match the closing balances disclosed on the DNC's Pre-General Report.

- \* Please find an amended Schedule D which corrects these discrepancies. Please note that for U.S. Healthcare, the change corrects an error for the Pre-General Report, not the Post-General Report.

7) You state that the DNC's report discloses an opening balance for Greenberg Research, Inc., but this vendor is not included on the Pre-General Report.

- \* Please find an amended Schedule D for the Pre-General Report which corrects this discrepancy.

Ms. Debbie Manzano  
May 8, 1997  
Page Three

8) You ask that all in-kind contributions disclosed on Schedule H4 be crossed referenced to its offsetting entry on Schedule H3. Furthermore, you ask that the DNC disclose any transfers to pay for, or escrow the federal portion of in-kind contributions.

\* Enclosed please find amended Pages H3 and H4 that cross-reference all allocable non-federal in-kind contributions received. Pursuant to FEC Advisory Opinion 1992-33, the DNC does not attempt to make a contemporaneous transfer of federal funds each time it receives a non-federal, allocable, in-kind contribution. Rather, the DNC intermittently makes bulk transfers of federal funds from its federal account to a DNC "In-Kind Escrow" account, which represents a good-faith estimate of the federal portion of non-federal, allocable, in-kind contributions to be received at some future date by the DNC. As information regarding in-kind contributions become available, the DNC then makes a transfer, based on the actual value of in-kind contributions received, from the In-Kind Escrow account to the Non-Federal Corporate account. During the first six months of 1996, the DNC transferred \$80,000 to this account for anticipated in-kind contributions received. During the Pre-General reporting period, the DNC transferred \$150,000 to this In-Kind Escrow account. During the Year-End period, the DNC transferred an additional \$150,000 to this In-Kind Escrow account.

9) You state that several disbursements to federal and non-federal committees do not qualify as allocable disbursements, and request that the DNC transfer the non-federal portion back to its non-federal account.

\* Non-Federal Payments - Payments to the following vendors (The New Jersey Lesbian & Gay Committee, L.A. Vote, African American Institute, Montgomery Improvements Association, National Coalition of Black Voters Participants) were contributions to various non-profit and political groups that undertook non-partisan Get-Out-The-Vote projects during the 1996 election cycle. Although the DNC believes that it could have legitimately contributed to these groups using solely non-federal funds, the DNC decided to allocate these contributions after being made aware of the FEC's findings in connection with an audit of one of the Democratic party's state committees. In this audit, the Commission ruled that the state party committee should have treated such contributions to non-partisan or non-federal get-out-the-vote

Ms. Debbie Manzano  
May 8, 1997  
Page Four

groups as allocable generic voter drive expenditures. See Report of the Audit Division on the Democratic State Central Committee of California - Federal, p.p. 16-20 (Approved August 29, 1996). Consequently, the DNC believes that it properly treated these payments in accordance with FEC precedents.

- \* Congressman Cleo Fields - These payments were made directly to Cleo Fields for generic voter drive activities done on behalf of the DNC during 1996. During this period, Mr. Fields was no longer a member of Congress. Enclosed, please find amended Schedules H4, which reflect a current address for Mr. Fields.
- \* Payments to Federal Committees - Payments to the following committees (Clinton/Gore '96, Democratic Senatorial Campaign Committee, Democratic Congressional Campaign Committee) were dollar-for-dollar reimbursements for expenditures paid for on behalf of the DNC by these committees. For the reasons set forth in our two letters of March 26, 1997, and our letter of April 18, 1997, the DNC believes that the treatment of these payments as operating expenditures was proper. Therefore, the DNC will not make any transfers to its non-federal account in connection with these payments at this time. Furthermore, in John Gibson's letter of April 7, 1997 to the DNC, he attempted to distinguish the DNC's payments to a non-connected PAC by stating that the precedent cited by the DNC in the above mentioned letters involved affiliated party committees and candidates. Therefore, it is our assumption that since Mr. Gibson tried to distinguish, rather than repudiate those precedents, Mr. Gibson acknowledges that such payments are permissible.

10) You state that payments to the Hollywood Women's Political Caucus ("HWPC") should not have been disclosed as an expenditure on Schedule H4. Rather, these expenditures should have been disclosed as contributions to another federal committee.

- \* These payments represent dollar-for-dollar reimbursements for payments made on behalf of the DNC by the HWPC. The DNC reiterates its arguments made in its letters of March 26, 1997 and April 18, 1997 regarding your characterization of these expenditures. Therefore, the DNC will not make any transfers to its non-federal account in connection with these payments at this time.

Ms. Debbie Manzano  
May 8, 1997  
Page Five

11) You ask that the DNC provide addresses for all vendors on Schedule H4 for which such addresses were omitted.

- \* Enclosed please find an amended Schedules H4 which includes all omitted addresses for Line 21(a).

12) You state that the amount disclosed on the last page of Line 21(b) does not match the total amount of expenditures disclosed on the this line.

- \* Enclosed please find an amended Page 2 of Line 21(b) which corrects the amount paid to Western Union. This correction clarifies the discrepancy between the amount on Schedule B and the cover pages.

13) You ask for clarification of all media expenditures made by the DNC on Schedule H4.

- \* All media expenditures disclosed on Schedule H4 were for "generic" media. These media expenditures were not made on behalf of any specific federal candidate.

14) You ask that the DNC provide addresses for all vendors on Schedule B, Line 5 for Non-Federal Finance Fund for which such addresses were omitted.

- \* Enclosed please find an amended Schedule B which includes all omitted addresses for Line 5 of Non-Federal Finance Fund.

15) You state that the total contributions on Line 1 of Non-Federal Unincorporated does not equal the amount disclosed on the summary page.

- \* The DNC has reviewed Line 1 of Schedule I of the Non-Federal Unincorporated account, as amended, and the accompanying Schedules A. Our review shows that the entries disclosed on Schedules A equal the amount disclosed on Line 1 of Schedule I. Therefore, no further amendment is necessary. Please note that NSF checks disclosed for the Year-End Report (\$31,000; amended to \$27,500) should applied to the Year-End report, and not to the Post-General Report.

2025-04-10 10:30:13

Ms. Debbie Manzano  
May 8, 1997  
Page Six

16) You state that certain pages of Line 11(a) omit the date of receipt.

- \* Please find amended pages of Schedule A which include this information.

17) You state that certain information was omitted from Schedule D.

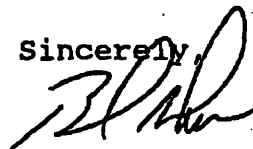
- \* Enclosed, please find an amended Schedule D which includes this omitted information.

18) You state that our amended report discloses a payment on Schedule D to Malchow & Company, but that this payment is not found on Schedule B.

- \* Enclosed please find an amended Schedule D which clarifies this discrepancy. Schedule D should have disclosed a debt owed to Malchow, Adams & Hussey, not Malchow & Company.

If you have any further questions, please contact me at the address below.

Sincerely,



Bradley K. Marshall  
Assistant Treasurer

**Democratic National Committee**Steve Grossman, *National Chair* ★ Governor Roy Romer, *General Chair*

JUN 11 8 13 AM '97

June 10, 1997

Mr. John D. Gibson  
Assistant Staff Director  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

**HAND DELIVERED**

ID#: C00010603

RE: Response to letter of May 22, 1997 to Carol Pensky, Treasurer,  
DNC Services Corporation/Democratic National Committee.

Dear Mr. Gibson:

The DNC is in receipt of your letter of May 22, 1997. In this letter, you request clarification of the following items from the 30 Day Post-General Report, which covered the period from October 17, 1996 through November 25, 1996.

1) You continue to question reimbursements made to Hollywood Women's Political Caucus ("HWPC") made during this period and earlier reporting periods.

- \* The DNC continues to reiterate its comments made in earlier letters. The DNC believes that the nature of these transactions should not be altered merely because the payments to DNC vendors merely "passed through" a federal political committee (The Commission even acknowledges that these transactions were in the normal course of business by stating that the payments were legitimate allocable expenses, "but for" the funds being "contributed" to HWPC. The DNC continues to contend that this transaction is not a contribution. Furthermore, the HWPC has disclosed this transaction as an offset to expenditure, and not as a contribution). DNC and HWPC entered into an arrangement whereby as part of the HWPC's assistance in the production of a fundraising event, HWPC dealt directly with and paid vendors for their services in connection with this event. HWPC sought, and received, immediate dollar-for-dollar reimbursement for those payments. The DNC continues to believe that these payments constitute legitimate allocable fundraising expenses, and not a contribution to a contribution to a federal political committee. Therefore, the DNC does not intend to transfer any funds to its non-federal account at this time, or to pursue any requests for a refund from HWPC at this time.



Mr. John Gibson  
June 10, 1997  
Page Two


2) You have asked for a complete address for a payment to Montgomery Improvement Association (Page 70 of Schedule H4).

\* The address is as follows:

Montgomery Improvement Association  
720 S. Hull Street  
Montgomery, AL 36104

If you have any questions regarding this letter, please contact me at the address below.

Sincerely,



Bradley K. Marshall  
Assistant Treasurer

21 JUN 1997 11:03:11



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

**MEMORANDUM**

**TO:** Office of the Commission Secretary

**FROM:** Office of General Counsel **KCS**

**DATE:** October 14, 1999

**SUBJECT:** 97L-24A & 24B-Memo to the Commission

The attached is submitted as an Agenda document for the  
Commission Meeting of \_\_\_\_\_

Open Session \_\_\_\_\_

Closed Session \_\_\_\_\_

**CIRCULATION**

**SENSITIVE** ☒  
**NON-SENSITIVE** ☐

**72 Hour TALLY VOTE** ☐

**24 Hour TALLY VOTE** ☐

**24 Hour NO OBJECTION** ☐

**INFORMATION** ☒

**DISTRIBUTION**

**COMPLIANCE** ☒

**Open/Closed Letters** ☐  
**MUR** ☐  
**DSP** ☐

**STATUS SHEETS** ☐  
**Enforcement** ☐  
**Litigation** ☐  
**PFESP** ☐

**RATING SHEETS** ☐

**AUDIT MATTERS** ☐

**LITIGATION** ☐

**ADVISORY OPINIONS** ☐

**REGULATIONS** ☐

**OTHER** ☐

21-04-403-0312