



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

RQ-2

Barbara Bonfiglio, Treasurer
America's Foundation FKA Fight -- PAC
1155 21st Street, NW, Suite 300
Washington, DC 20036

JAN 08 2003

Identification Number: C00305797

Reference: October Quarterly Report (7/1/02-9/30/02)

Dear Ms. Bonfiglio:

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 one or more contributions which appear to be from corporations and/or labor organizations. 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations and labor organizations unless made from separate segregated funds established by the corporations and labor organizations.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you must amend your original report with clarifying information.

If you have received prohibited contributions, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR 103.3(b)(1).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

-Schedule B of your report discloses one or more contributions to "Pickering for Congress" for the retirement of debts incurred by the "2002 Primary" election campaign; however, it appears that the recipient committee(s) had insufficient debts to warrant such a contribution. Please note that a committee may only designate contributions to retire a candidate's debts if those debts exist.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, refunds are reported on Line 16 of the Detailed Summary Page and on Schedule A of the report covering the period during which they are received. Redesignations are reported as memo entries on Schedule B of the report covering the period during which the redesignation is made. 11 CFR §110.2(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B of your report to clarify the following description(s): "Fundraising Fee and Expense Reimbursement". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

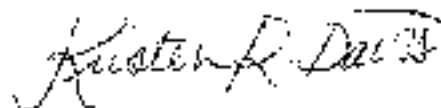
-Please amend Schedule B supporting Line 23 by providing the office sought, state, and district for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

-Your report discloses in-kind contributions made on behalf of a federal candidate. The original payments for the goods and services have been itemized as operating expenditures and included in the total for Line 21 of the Detailed Summary Page.

For future reporting, it is recommended that the amount of such activity be subtracted from Line 21 and added to Line 23 of the Detailed Summary Page. This method of reporting would clarify for the public record the total amount of contributions to federal candidate (including in-kinds) by reflecting them on Line 23 of the Detailed Summary Page.

A response or 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. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Kristen R. Davis
Campaign Finance Analyst
Reports Analysis Division

**SCHEDULE A (FEC FORM 702)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

Check only one

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 17
13	14	15	16	

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

NAME OF COMMITTEE (In Full)
America's Foundation

Full Name (Last, First, Middle Initial) A. Brian Myers Squibb Company		Date of Receipt M M / D D / Y Y Y Y 09 / 27 / 2002
Mailing Address P.O. Box 5200 City State Zip Code Princeton NJ 08543-5200		Amount of Each Receipt this Period 5000.00
FEC ID number of contributing federal political committee.		Contribution
Name of Employer	Occupation	
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 5000.00	Transaction ID: SA24197

Full Name (Last, First, Middle Initial) B. Mrs. Elizabeth C. Huch		Date of Receipt M M / D D / Y Y Y Y 09 / 27 / 2002
Mailing Address 327 Arcadia Dr. City State Zip Code Pittsburgh PA 15237-		Amount of Each Receipt this Period 250.00
FEC ID number of contributing federal political committee.		Contribution
Name of Employer Precoat Mfg. Co.	Occupation RETIRED	
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 250.00	Transaction ID: SA24268

Full Name (Last, First, Middle Initial) C. Ms. Lorena Jech		Date of Receipt M M / D D / Y Y Y Y 09 / 27 / 2002
Mailing Address PO Box 426 City State Zip Code Mango FL 33592-0426		Amount of Each Receipt this Period 2000.00
FEC ID number of contributing federal political committee.		Contribution
Name of Employer self	Occupation RETIRED	
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 2000.00	Transaction ID: SA24273

SUBTOTAL of Receipts This Page (optional) ▶ 7250.00

TOTAL This Period (last page this line number only) ▶

2023年11月17日 星期五