

**METROPOLITAN POLITICAL ACTION COMMITTEE**

1050 17th Street, N.W., Suite 300

Washington, D.C. 20036

(202) 296-3100

RECEIVED  
FEDERAL ELECTION  
COMMISSION

AUG 19 12 52 PM '98

August 14, 1998

Ms. Jennifer K. Wall  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Identification Number: C00295642

Reference: Mid-Year Report (1/1/97-6/30/97)

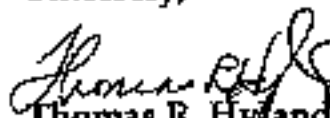
Dear Ms. Wall

Thank you for your letter of July 31, 1998 advising Apartment and Office Building Association of Metropolitan Washington DC, Inc. (Metro PAC-Federal) of the error in our mid-year report of July 31, 1997. As your letter notes, the deposit of a check on February 18, 1997 from Van Metre Management Company of Burke, Virginia in the amount of \$500.00 to Metro PAC-Federal was inappropriate. While we did not retain a copy of that contributors check, we do recall that check and remember that it was solicited for and was made payable to our Virginia PAC (Metro PAC for Virginia) but was inadvertently deposited in the account of Metro-PAC Federal.

To reflect the appropriate corrective action requested in your letter, we are making a \$500.00 payment from the account of Metro-PAC Federal to the account of Metro-PAC Virginia (copy of check attached).

We appreciate your bringing this error to our attention and for the opportunity to take appropriate corrective action. As you may know, under Virginia law, contributions to Virginia State PAC's may be made by corporations and partnerships (as was the case with the Van Metre Management Company) as well as individuals.

Sincerely,

  
Thomas R. Hyland  
Treasurer

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METRO PAC-FEDERAL E-94  
1050 - 17TH ST, NW, SUITE 300  
WASHINGTON, DC 20036

July 20, 1998 15-1557540

PAY TO THE ORDER OF Metropolitan Washington PAC for Virginia \$ 500.00  
Five Hundred 00/100 DOLLARS

 THE PALMER NATIONAL BANK  
1407 K STREET, N.W.  
WASHINGTON, DC 20004

FOR Transfer to correct error. *Margaret O. Jensen*  
⑆000138⑆ ⑆054001550⑆ 30008854⑆



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-5

Thomas R. Hyland, Treasurer  
Apartment and Office Building Association  
of Metropolitan Washington DC Inc.  
Metro PAC-Fed  
1050 17<sup>th</sup> St., NW, Suite 300  
Washington, DC 20036

JUL 31 1998

Identification Number: C00295642

Reference: Mid-Year Report (1/1/97-6/30/97)

Dear Mr. Hyland:

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 portions attached) discloses an apparent contribution(s) from a corporation(s). 2 U.S.C. §441b(a)) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have received a corporate contribution(s), you must transfer-out the impermissible funds to an account not used to influence federal elections or refund the full amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all transfers-out and refunds should be made within thirty days of the treasurer's receipt of the impermissible funds. 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 receiving a refund or granting written authorization for a transfer to another account.

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 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 a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

-For future reporting, please be advised that only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 29.

-For future filings, please note that your committee need only file the pages on which you have itemized activity. Schedules with no activity may be omitted.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Jennifer K. Wall  
Reports Analyst  
Reports Analysis Division

**SCHEDULE A**

**ITEMIZED RECEIPTS**

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

PAGE 3 OF 13  
FOR LINE NUMBER

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) **Apartment & Office Building Association of Metropolitan Washington Metro PAC-Federal**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Van Metre Management Company 5280 Lyngate Court Burke, VA 22015 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	N/A Occupation:	2-18-97	500.00
Aggregate Year-to-Date > \$ 500.00			
B. Full Name, Mailing Address and ZIP Code David H. Hillman 1950 Old Gallows Road, #600 Vienna, VA 22182 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Southern Mgmt. Corp. Occupation:	6-11-97	1,000.00
Aggregate Year-to-Date > \$ 1,000.00			
C. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation:	Date (month, day, year)	Amount of Each Receipt this Period
Aggregate Year-to-Date > \$			
D. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation:	Date (month, day, year)	Amount of Each Receipt this Period
Aggregate Year-to-Date > \$			
E. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation:	Date (month, day, year)	Amount of Each Receipt this Period
Aggregate Year-to-Date > \$			
F. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation:	Date (month, day, year)	Amount of Each Receipt this Period
Aggregate Year-to-Date > \$			
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation:	Date (month, day, year)	Amount of Each Receipt this Period
Aggregate Year-to-Date > \$			

SUBTOTAL of Receipts This Page (optional) **1,500.00**

TOTAL This Period (last page this line number only) **1,500.00**

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> First Class Mail	POSTMARKED 8-17-98
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other ( Specify):	Postmarked _____ and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>JMN</i> PREPARER	8-15-98 DATE PREPARED