



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

Stacy E. Bonitz, Treasurer
Brush Wellman Good Government Fund
17876 St. Clair Avenue
Cleveland, OH 44110

NOV 6 1998

Identification Number: C00216770

Reference: October Quarterly Report (7/1/98-9/30/98)

Dear Ms. Bonitz:

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:

-Your report(s) was not signed by the treasurer or designated agent listed on your Statement of Organization. Please amend your report(s) by providing the signature of an individual that is authorized to sign the report(s). 2 U.S.C. §434(a)(1) and 11 CFR §104.14(a) and (d) If a new treasurer has been appointed, please file an amended Statement of Organization (FORM 1) or a letter to reflect this change.

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the amount deducted each pay period. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions from Non-Federal Candidates should be properly disclosed on a separate Schedule B, supporting Line 29 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

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,

A handwritten signature in cursive script, appearing to read "Lucy J. Denny".

Lucy J. Denny
Reports Analyst
Reports Analysis Division

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PAYROLL DEDUCTIONS

SCHEDULE A		ITEMIZED RECEIPTS		Use separate schedules for each category of the Deductible Surveys Page	PAGE OF FOR LINE NUMBER 11(a)(2)
Contributions from Individuals					
Any receipts or copies 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 committees.					
NAME OF COMMITTEE (in Full) National Organization PAC 000000001					
A. Full Name, Mailing Address and ZIP Code		Name of Employer		Date (month, day, year)	Amount of Each Receipt (in Dollars)
Anne Sullivan E. 15th Street City, State ZIP		National Organization, Inc.		payroll deduction	\$90.00
Report For: <input type="checkbox"/> Primary <input type="checkbox"/> Other activity		Occupation Branch Manager		Aggregate Year-to-Date > 1	\$15 (bi-weekly)
B. Full Name, Mailing Address and ZIP Code		Name of Employer		Date (month, day, year)	Amount of Each Receipt (in Dollars)
Rodney Jones 881 Mainbury Road City, State ZIP		National Organization, Inc.		payroll deduction	\$120.00
Report For: <input type="checkbox"/> Primary <input type="checkbox"/> Other activity		Occupation Vice President		Aggregate Year-to-Date > 2	\$20 (bi-weekly)

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.0(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(ii) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See Item A in the illustration above.)

IN-KIND CONTRIBUTIONS

SCHEDULE A		ITEMIZED RECEIPTS		Use separate schedules for each category of the Deductible Surveys Page	PAGE OF FOR LINE NUMBER 11(a)(2)
Contributions from Individuals					
Any receipts or copies 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 committees.					
NAME OF COMMITTEE (in Full) National Organization PAC 000000001					
A. Full Name, Mailing Address and ZIP Code		Name of Employer		Date (month, day, year)	Amount of Each Receipt (in Dollars)
Martin L. Kress 4 River Road City, State ZIP		National Organization, Inc.		8/10/94	\$3,899.00 (IN-KIND) (RAFFLE PRIZE)
Report For: <input type="checkbox"/> Primary <input type="checkbox"/> Other activity		Occupation Chairman		Aggregate Year-to-Date > 1	3,899.00

SCHEDULE B		ITEMIZED DISBURSEMENTS		Use separate schedules for each category of the Deductible Surveys Page	PAGE OF FOR LINE NUMBER 21(b)
Operating Expenditures/Other Federal					
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 committees.					
NAME OF COMMITTEE (in Full) National Organization PAC 000000001					
A. Full Name, Mailing Address and ZIP Code		Purpose of Disbursement		Date (month, day, year)	Amount of Each Disbursement (in Dollars)
Martin L. Kress 4 River Road City, State ZIP		Raffle prize		8/10/94	\$3,899.00 (IN-KIND CONTRIBUTION)
Report For: <input type="checkbox"/> Primary <input type="checkbox"/> Other activity		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> Other activity			

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See page 8 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at left.

