



FEDERAL ELECTION COMMISSION RQ-3

WASHINGTON, D.C. 20463

February 21, 1997

Eugene A. Delgaudio, Treasurer
Public Affairs PAC
6734 Westcott Road
Falls Church, VA 22042

Identification Number: C00224493

Reference: October Quarterly (7/1/96-9/30/96) and 12 Day Pre-General
(10/1/96-10/15/96) Reports

Dear Mr. Delgaudio:

This letter is to inform you that as of February 20, 1997, the Commission has not received your response to our requests for additional information dated January 29, 1997. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Edward D. Ryan on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

JAN 29 1997

Eugene A. Delgaudio, Treasurer
Public Affairs PAC
6734 Westcott Road
Falls Church, VA 22042

Identification Number: C00224493

Reference: October Quarterly Report (7/1/96-9/30/96)

Dear Mr. Delgaudio:

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 E discloses independent expenditures on behalf of federal candidates (pertinent portion(s) attached). Schedule B of a previous report disclosed in-kind contributions on behalf of some of these same candidates. Under 2 U.S.C. §431(17), an "independent expenditure" is defined as:

... an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate which is made without cooperation or consultation with any candidate, or any authorized committee or agent of such candidate, and which is not made in concert with, or at the request or suggestion of, any candidate, or any authorized committee or agent of such candidate.

The coordination involved in making an in-kind contribution to a candidate may preclude your committee from making an independent expenditure in support of the same candidate. Under 11 CFR §109.1(c), any expenditure which does not qualify as an independent expenditure is considered an in-kind contribution. Please amend your reports to disclose the aforementioned transactions as in-kind contributions (Schedule B supporting Line 23 of the Detailed Summary Page), or provide additional clarifying information concerning the independent expenditures made in opposition to Clinton for President.

If the reclassification of these expenditures as in-kind contributions results in excessive contributions, the Commission recommends that you notify the

recipient(s) and request a refund of the amount in excess of \$5,000 per election. Please inform the Commission immediately in writing and provide a photocopy of your refund request(s) sent to the recipient(s). In addition, any refund should be disclosed on Schedule A supporting Line 16 of your next report.

-On Schedule A supporting Line 11(a)(i) of the Detailed Summary Page, your report disclosed contributions from individuals that omit the aggregate year-to-date totals. Please amend your report by supplying the information.
11 CFR §104.3(a)(4)(i)

-Your report disclosed certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. Other federal operating expenditures, such as, bank charges, office supplies, publishing/printing, consulting, postage, misc. office, and printing "coord." mailing, should be properly disclosed on a separate Schedule B, supporting Line 21(b). Direct contributions to federal candidates and committees should be properly disclosed on a separate Schedule B, supporting Line 23. Independent expenditures for communications, such as newspaper, TV or direct mail advertisement that expressly advocates the election or defeat of a clearly identified candidate and not made in coordination, consultation, or cooperation with that candidate should be properly disclosed on a Schedule E, supporting Line 24. Direct contributions to non-federal candidates and committees 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 or included in the March 1995 Campaign Guide for Nonconnected Committees to determine the proper categorization when amending your report.

-The totals listed on Lines 21(b), 21(c), 23, 24, 29, 30 and 31, Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-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.

-Your committee reports disbursements on Schedule B and Schedule E which appear to be identical. Duplication in reporting disbursements may cause inflated or distorted disbursement totals. Please amend your report to clarify your disbursements.

A written response or an 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. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

A handwritten signature in black ink that reads "Edward D. Ryan". The signature is written in a cursive style with a large, stylized initial "E".

Edward D. Ryan
Reports Analyst
Reports Analysis Division

ITEMIZED INDEPENDENT EXPENDITURES

4.5

(See Reverse Side for Instructions)

Name of Committee (in Full)				
Public Affairs Political Action Com.				
Full Name, Mailing Address & ZIP Code of Each Payor	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
11 th District - Republican Committee P.O. Box 10723 Burke, VA 22009	Reception	9/16/96	100.00	Clinton FOR PRESIDENT <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
Brian Babin for Congress 1203 West Dogwood Woodville, TX 75979	Direct Contribution to assist Anti-Clinton activities	9/6/96	100.00	Clinton FOR PRESIDENT <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
Dennis Patrick Campaign P.O. Box 97 Stanley, N.D. 58784	Contributions to assist Anti-Clinton activities	9/9/96	50.00	Clinton FOR PRESIDENT <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
Friends of David Roy 4421 Erie ST Annandale, VA 22002	Contribution for anti-Clinton literature	9/11/96	400.00	Clinton FOR PRESIDENT <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
Friends of Mike Hammond 1 STARK Highway So Dunbarton, NH 03045	Contribution for Anti-Clinton brochure	9/5/96	1,200.00	Clinton FOR PRESIDENT <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
George Mason Univ Republic Box 173 Fairfax, VA 22030	Contribution for Anti-Clinton literature.	9/3/96	50.00	Clinton FOR PRESIDENT <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
(b) SUBTOTAL of Itemized Independent Expenditures			1,100	
(c) SUBTOTAL of Unitemized Independent Expenditures				
(d) TOTAL Independent Expenditures				

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or reproduction in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this 15 day of October 1996

Regina Delgado
Secretary

Oct 15, 1996



[Signature]
NOTARY PUBLIC

My Commission Expires February 20, 2001

ITEMIZED INDEPENDENT EXPENDITURES

Page 2 of 2

(See Reverse Side for Instructions)

Name of Committee (in Full)				
Public Affairs Political Action Committee				
Name, Mailing Address & ZIP Code of Each Payer	Purpose of Expenditure	Date made, this year	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Jenkins for senate 914 North Foster drive Baton Rouge LA 70806	Contribution for anti-Clinton literature	8/10/96	100.00	Clinton FOR PRES. <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
Stockman for Congress P.O. Box 57135 Webster, TX 77598	Contribution for Anti Clinton literature	7/14/96	100.00	Clinton FOR PRES. <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
Tate for Congress Suite 142 VA Beach, 23464 VA	Contribution for anti-Clinton literature	9/6/96	400.00	Clinton FOR PRES. <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
Tax Fighters for Baldwin P.O. Box 13277 El Cajon CA, 92022	Contribution for Anti-Clinton literature	7/23/96	50.00	Clinton FOR PRES. <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
The Right stuff P.O. Box 850 Stafford VA 22555	Contribution for Anti-Clinton literature	7/18/96	50.00	Clinton FOR PRES. <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
VA YRS P.O. Box 5557 ARL., VA 22205	Contribution for Anti Clinton literature	7/1/96	25.00	Clinton FOR PRES. <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
(a) SUBTOTAL of Itemized Independent Expenditures			925.	254,428.24
(b) SUBTOTAL of Unitemized Independent Expenditures				
(c) TOTAL Independent Expenditures				254,428.24

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, concert, collusion, or in the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or publication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Regina Delgado
Signature

Oct 15, 1996
Date

My Commission Expires February 29, 2001



Subscribed and sworn to before me this 15 day of October 1996

Robert C. [Signature]
NOTARY PUBLIC

