FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

John M. Clayton, Treasurer   NOV 3 1995
Great-West Life & Annuity
Insurance Company Political
  Action Committee
8515 E. Orchard Road
Englewood, CO 80111

Identification Number: C00263723

Reference: Mid-Year Report (1/1/95-6/30/95)

Dear Mr. Clayton:

    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 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 per pay period. 11 CFR
    §104.8(b) Please refer to the enclosed sample of
    properly reported payroll deductions.

    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) 219-3580.

                              Sincerely,

                              Jan McBride
                              Reports Analyst
                              Reports Analysis Division

248

PAYROLL DEDUCTIONS

SCHEDULE A	ITEMIZED RECEIPTS	Use separate schedule(s) for each category of the Detailed Summary Page	PAGE OF
			FOR LINE NUMBER
			11(a)(i)

Contributions from Individuals

Any information copied from such Reports and Statements may not be sold or used by any person for the purposes 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)

National Organisation PAC   C00000001

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Anne Sullivan 21 18th Street City, State ZIP	National Organization, Inc.	payroll deduction	$90.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Branch Manager Aggregate Year-to-Date ▶	285.00	($15 biweekly.)
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Rodney Jones 881 Mainsbury Road City, State ZIP	National Organization, Inc.	payroll deduction	$120.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Vice President Aggregate Year-to-Date ▶	580.00	($20 biweekly)

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

IN-KIND CONTRIBUTIONS

SCHEDULE A	ITEMIZED RECEIPTS	Use separate schedule(s) for each category of the Detailed Summary Page	PAGE OF
			FOR LINE NUMBER
			11(a)(i)

Contributions from Individuals

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NAME OF COMMITTEE (In Full)

National Organization PAC   C00000001

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Martin L. Krass 4 River Road City, State ZIP	National Organization, Inc.	6/19/94	$3,999.00 (IN-KIND)
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Chairman Aggregate Year-to-Date ▶	3,999.00	(RAFFLE PRIZE)

SCHEDULE B	ITEMIZED DISBURSEMENTS	Use separate schedule(s) for each category of the Detailed Summary Page	PAGE OF
			FOR LINE NUMBER
			21(b)

Operating Expenditures/Other Federal

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NAME OF COMMITTEE (In Full)

National Organization PAC   C00000001

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Martin L. Krass 4 River Road City, State ZIP	raffle prize	6/19/94	$3,999.00 (IN-KIND CONTRIBUTION)
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		

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

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. 104.8(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

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 right.

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