



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

APR 3 1998

Albert L. Richey, Treasurer
Anadarko Petroleum Corporation
Political Action Committee
17001 Northchase Drive
Houston, TX 77060

Identification Number: C00231951

Reference: Year End Report (7/1/97-12/31/97)

Dear Mr. Richey:

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) discloses contributions received through a payroll deduction plan. Generally, a committee's report must identify each contribution from an individual which in the aggregate exceeds \$200 during the calendar year. (2 U.S.C. §434(b)) For your information, instead of separate itemization, a committee using a payroll deduction plan may disclose the aggregate amount of contributions received from the contributor through the payroll deduction plan during the reporting period; the identification of the individual where the contribution exceeds \$200 in the aggregate during the calendar year; and a statement of the amount deducted per pay period. 11 CFR §104.8(b)

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,

Debbie Manzano

Debbie Manzano
Senior Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

SCHEDULE A ITEMIZED RECEIPTS

Line number indicated for
item category on the
Detailed Summary Page PAGE OF
FORM LINE NUMBER
11(a)(ii)

Contributions from Individuals

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

NAME OF COMMITTEE (a)(1)

National Organization PAC C00000001

A. Full Name, Mailing Address and ZIP Code	Name of Employee	Date Period for year	Amount of Cash Received/Paid
Anne Sullivan 23 18th Street City, State ZIP	National Organization, Inc. Employee	payroll deduction	\$90.00
Receptor Other Receipts	Branch Manager Aggregate Year-to-Date > 1	200.00	(-\$15 biweekly)
B. Full Name, Mailing Address and ZIP Code	Name of Employee	Date Period for year	Amount of Cash Received/Paid
Rodney Jones 681 Hartsbury Road City, State ZIP	National Organization, Inc. Employee	payroll deduction	\$120.00
Receptor Other Receipts	Vice President Aggregate Year-to-Date > 1	360.00	(-\$30 biweekly)

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. 104.8(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

SCHEDULE A ITEMIZED RECEIPTS

Line number indicated for
item category on the
Detailed Summary Page PAGE OF
FORM LINE NUMBER
11(a)(ii)

Contributions from Individuals

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NAME OF COMMITTEE (a)(1)

National Organization PAC C00000001

A. Full Name, Mailing Address and ZIP Code	Name of Employee	Date Period for year	Amount of Cash Received/Paid
Martin L. Kress 4 River Road City, State ZIP	National Organization, Inc. Employee	8/10/94	\$3,000.00 (ON-BOND) (RAFFLE PRIZE)
Receptor Other Receipts	Chairman Aggregate Year-to-Date > 1	3,000.00	(PRIZE)

SCHEDULE B ITEMIZED DISBURSEMENTS

Line number indicated for
item category on the
Detailed Summary Page PAGE OF
FORM 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 to contribute purposes other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (a)(1)

National Organization PAC C00000001

A. Full Name, Mailing Address and ZIP Code	Name of Recipient	Date Period for year	Amount of Cash Received/Paid
Martin L. Kress 4 River Road City, State ZIP	Raffle prize	8/10/94	\$3,000.00 (ON-BOND CONTRIBUTION)

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 right.

