

NACPAC

NATIONAL
ACTION
COMMITTEE

201 South Biscayne Boulevard * Suite 880 * Miami, Florida 33131
Telephone: (305) 358-9207 * FAX: (305) 358-1618

April 04, 1994

Jan McBride, Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Identification No. COO147283

Dear Ms. McBride:

Reference your letter dated March 23, 1994, concerning administrative expenses, copy thereof attached for your ease of reference.

Please be advised that none of the administrative expenses nor any expenses of NACPAC are paid by a connected organization. In addition, NACPAC does not have a non-federal account. There are no goods or services provided to NACPAC which would be considered in-kind contributions other than volunteer time by NACPAC's officers and desk space for NACPAC's part-time secretary.

As set forth in both our mid-year and year-end reports, amounts are paid, usually monthly, to the current chairman as a reimbursement for administrative expenses in a lump-sum, including, but not limited to, salaries, payroll taxes, telephone, facsimiles, office supplies, reproduction costs, postage, printing, couriers, etc.

Please do not hesitate to contact the undersigned if you have any further questions or require any further documentation. Thank you for your attention to this matter.

Very truly yours,

NACPAC

By:


Mark R. Vogel, Chairman

MRV/ly
Encls.
Cert. RRR (P 271 217 051)

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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Charles Citrin, Treasurer
National Action Committee - NACPAC
201 So. Biscayne Blvd., Suite 880
Miami, FL 33131

MAR 23 1994

Identification Number: C00147983

Reference: Mid-Year (1/1/93-6/30/93) and Year End (7/1/93-12/31/93) Reports

Dear Mr. Citrin:

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 discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 21 of the Detailed Summary Page. (2 U.S.C. §434(b)(5)) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty (60) days or more. 11 CFR §104.11

If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2)

PLEASE NOTE: Should your committee have a non-federal account(s), these administrative expenses MUST be disclosed on Lines 18, 21(a)(i) and 21(a)(ii) of the Detailed Summary Page and Schedules H2, H3 and H4 (and possibly Schedule H1 if it has not previously been filed). (See 11 CFR §106.6(b)(2)(i)).

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure

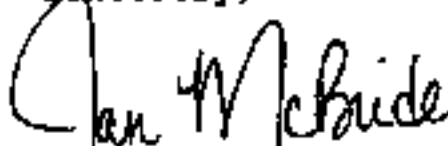
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requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Please provide clarification regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations. Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year.

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,



Jan McBride
Reports Analyst
Reports Analysis Division

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**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.

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 PREPARER

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