



RECEIVED
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COMMISSION MAIL ROOM

Bruce Charendoff
Executive Director and Assistant General Counsel
Government Affairs

SEP 21 1 55 PM '98

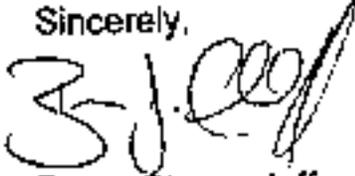
September 18, 1998

Ms. Debbie Manzano
Senior Reports Analyst
Reports Analysis Division
Federal Election Commission
998 E Street NW
Washington DC 20463

Dear Ms. Manzano:

This letter is in response to yours of August 21, 1998 (attached), concerning a distribution made by The SABRE Group Political Action Committee to a candidate two days after a primary election but designated for the candidate's primary campaign. SABRE PAC made the contribution believing that the recipient committee had a debt remaining from the primary against which the contribution would be applied. Upon further inquiry, it has been learned that no primary debt exists. Accordingly, SABRE PAC has requested, and the recipient has agreed, to refund the contribution immediately. We expect the refund will be made shortly and will provide you with a copy of the check as soon as we receive it.

Should you have any questions concerning this matter, please do not hesitate to call.

Sincerely,

Bruce Charendoff
Assistant Treasurer
The SABRE Group PAC

Faint, illegible text at the bottom of the page, possibly a carbon copy or bleed-through from the reverse side.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20413

RQ-5

Andrew B. Steinberg, Treasurer
Sabre Group Inc. Political Action
Committee (SABREPAC)
1101 17th Street, NW, Suite 600
Washington, DC 20036

AUG 21 1998

Identification Number: C00325811

Reference: July Monthly Report (6/1/98-6/30/98)

Dear Mr. Steinberg:

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 B supporting Line 23 of your report discloses a contribution(s) to a candidate(s) for the 1998 Primary election; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. Please clarify the contribution(s) and disclose any redesignations or refunds as necessary on the appropriate schedules.

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

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Page	PAGE	OF
	1	3
FOR LINE NUMBER		23

Contributions to Federal Candidates/Committees

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 committee.

NAME OF COMMITTEE (SEE F11)
The SABRE Group, Inc. Political Action Committee

Full Name, Mailing Address and ZIP Code	Payee of Disbursement Contribution: Spencer Abraham (MI-R)	Date (month, day, year)	Amount of Each Disbursement this Period
Firehook Bakery 18th & K Streets, N.W. Washington, DC	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other: 2000	6/11/98	548.00 In-kind Contribution
The Sabre Group 1801 17th St., N.W. Washington, DC 20036	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other: 2000	6/11/98	5337.98 In-kind Contribution
Abraham for Senate 2000 26600 Telegraph Rd. Southfield, MI 48034	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other: 2000	6/15/98	54,514.10
John Brexler Senate Committee 118 S East Broad Street Folk Church, VA 22046	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1998	6/1/98	\$1,000.00
A Lot of People Supporting Tom Daschle 424 C Street NE First Floor Washington, DC 20002	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1998	6/4/98	2000.00
A Lot of People Supporting Tom Daschle 424 C Street NE First Floor Washington, DC 20002	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other: 1998	6/6/98	2000.00 Primary date: 6/8/98
Friends of Chris Dodd 363 C Street NE Washington, DC 20002	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1998	6/25/98	\$1,000.00
Largest for Congress Committee 1155 2151 Street, N.W. Suite 300 Washington, DC 20037	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1998	6/15/98	\$500.00
John McCain for U.S. Senate 517 2nd Street, NE Washington, DC 20002	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other: 1998	6/15/98	\$1,000.00

SUBTOTAL of Disbursements This Page (optional) \$9,500.00

TOTAL This Period (last page this line number only)

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.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> First Class Mail	POSTMARKED 9-17-98
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>scp</i> PREPARER	9-27-98 DATE PREPARED