



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

RQ-5

Dr. Sarkis J. Kechejian, Treasurer  
Armenian American PAC (ARMENPAC)  
421 E. Airport Freeway  
Irving, TX 75206

NOV 08 2002

Identification Number: C00352054

Reference: Year End Report (7/1/01-12/31/01)

Dear Dr. Kechejian:

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:

-The Commission notes the apparent redesignation and/or reattribution of several contributions. Please amend your report to disclose the proper format for redesignations and/or reattributions. The first entry must disclose, as a memo entry, the information for the contribution as it was originally reported; the second entry must disclose, as a memo entry, the information as it has been redesignated or reattributed, including the date the redesignation or reattribution documentation was made/received by the committee (11 CFR §104.8(d)(2), (3), and (4)). The Committee should also provide the Commission with a copy of the signed documentation. See the attached sample of properly reported redesignations.

-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(s) B supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5). 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). In addition, if expenses have been

11/11/02 10:00 AM

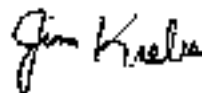
incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

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 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.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

Any amendment or clarification should be filed with the Federal Election Commission. Electronic filers must file amendments (to include statements, designations, and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Jim Krebs  
Campaign Finance Analyst  
Reports Analysis Division

# REDESIGNATION ORIGINAL DESIGNATION: YEAR-END REPORT

SCHEDULE B (FEC Form 302) ITEMIZED DISBURSEMENTS		FOR LINE NUMBER (check only one)	PAGE 1 OF 1
<small>Use separate schedule(s) for each category of the Detailed Summary Page</small>		<input type="checkbox"/> 21b <input type="checkbox"/> 22 <input type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 25 <input type="checkbox"/> 26 <input type="checkbox"/> 27 <input type="checkbox"/> 28 <input type="checkbox"/> 29 <input type="checkbox"/> 30 <input type="checkbox"/> 31 <input type="checkbox"/> 32 <input type="checkbox"/> 33	
<small>Any information copied from such Reports and Statements may not be used or used for the purpose of avoiding contributions or for comparable purposes. GMSI may copy the name and address of any political committee to GMSI contributors upon such committee's consent.</small>			
NAME OF COMMITTEE OR PAC Section Incorporated PAC <small>Full Name (Use Rev. 1/2004 11/03)</small>			
A. Committee to Reelect Mark Aurelius Mailing Address 512 Via Sagra Road City Home State Zip Code Home NY 00000 Purpose of Disbursement Contribution Candidate Name Mark Aurelius Office Sought <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify) * State NY County 00		Date of Disbursement 12/30/00 Amount of Cash Disbursement This Period 5000.00	
		Category Code 011	

## Redesignations of Contributions

Use memo entries to show any redesignations of contributions.

If a contribution to a candidate is redesignated after the close of books, show the redesignation on the next report and indicate the report on which the original contribution was itemized.

In this illustration, the committee originally made a \$5,000 contribution to a candidate's campaign, intending it to count toward the primary election. The committee itemized the contribution in its year-end report. The following month, the campaign requested that the SSF redesignate \$4,500 to help retire debts from the previous general election campaign. The committee itemized the redesignation in its April quarterly report.

# REDESIGNATION: APRIL REPORT

SCHEDULE B (FEC Form 302) ITEMIZED DISBURSEMENTS		FOR LINE NUMBER (check only one)	PAGE 1 OF 1
<small>Use separate schedule(s) for each category of the Detailed Summary Page</small>		<input type="checkbox"/> 21b <input type="checkbox"/> 22 <input type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 25 <input type="checkbox"/> 26 <input type="checkbox"/> 27 <input type="checkbox"/> 28 <input type="checkbox"/> 29 <input type="checkbox"/> 30 <input type="checkbox"/> 31 <input type="checkbox"/> 32 <input type="checkbox"/> 33	
<small>Any information copied from such Reports and Statements may not be used or used for the purpose of avoiding contributions or for comparable purposes. GMSI may copy the name and address of any political committee to GMSI contributors upon such committee's consent.</small>			
NAME OF COMMITTEE OR PAC Section Incorporated PAC <small>Full Name (Use Rev. 1/2004 11/03)</small>			
A. Committee to Reelect Mark Aurelius Mailing Address 512 Via Sagra Road City Home State Zip Code Home NY 00000 Purpose of Disbursement Contribution Candidate Name Mark Aurelius Office Sought <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify) * State NY County 00		Date of Disbursement 12/30/00 Amount of Cash Disbursement This Period 5000.00	
		Category Code 011	
B. Committee to Reelect Mark Aurelius Mailing Address 512 Via Sagra Road City Home State Zip Code Home NY 00000 Purpose of Disbursement Contribution Candidate Name Mark Aurelius Office Sought <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (Specify) * State NY County 00		Date of Disbursement 01/25/01 Amount of Cash Disbursement This Period 4500.00	
		Category Code 011	MEMO (As disclosed in 2001 year-end) <sup>1</sup>
		Category Code 011	MEMO (redesignated of above contribution) <sup>1</sup>

<sup>1</sup>When using FDC70s, this is entered automatically by checking the memo filing box.

<sup>2</sup>When using BECF0s on Schedule B, this information is entered using "memo desc."  
See page 43.

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