

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

FEB 6 11 34 AM '98

Clean Up Congress
FEC #: C00245456
PO Box 9254
South Lake Tahoe, CA 96158
December 20, 1997

Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear FEC:

ATTN: Monica Johnson / REPORTS ANALYSIS

This letter is in response to letters dated 4-23-91 and subsequent follow-up conversations with Monica Johnson in Reports Analysis.

The issue that was flagged by the FEC concerned the dates of expenditures falling outside the stated time period for reporting. For example, the July Quarterly report, which includes activity from April 1 to June 30 may have had an expenditure dated July 16. This came from our effort to place an expenditure in the time period it occurred, but not necessarily was paid on. Many times something would be ordered or someone would provide a service for the campaign on a certain date, then we would actually pay them at a later date. We would then report the expenditure in the period it took place, without regard to when the check was actually written.

Continuing the example, let's say we had some copies made on June 20. The copy company billed us, and then we wrote the check on July 16. We would have reported that in the July Quarterly report with July 16th in the date column. In review of the reports in question, you will see that a majority of these off-dated expenditures come on the same day. Generally, the day we paid bills.

In conversations with Ms. Johnson, we have arrived at a new system which we will report both the date of the actual expenditure and the date of the check, if the two do not occur in the same reporting period. We will also only calculate the expenditure at the time of payment. This will hopefully alleviate any perception of mis-reporting. Ms. Johnson also indicated that an explanatory letter would suffice to remedy the situation with past reports.

The second issue was a missing schedule E which is enclosed.

The third issue raised dealt with in-kind contributions for candidates. As discussed with Ms. Johnson, we do not contribute to candidates through in-kind contributions. If you have any questions concerning these or other issues, please feel free to contact me at 530-544-0320.

Sincerely,


Todd M. Foreman

SCHEDULE E

please all put to send 10/25/96

RECEIVED FEDERAL ELECTION COMMISSION MAIL ROOM 1 - 1
 ITEMIZED INDEPENDENT EXPENDITURE
 (See Reverse Side for Instructions) Oct 27 8 12 AM '96

| Name of Candidate (in Full) | | COD 245 456 | | |
|---|------------------------|-------------------------|---------|---|
| Full Name, Mailing Address & ZIP Code of Each Payer | Purpose of Expenditure | Date (month, day, year) | Amount | Name of Federal Candidate supported or opposed by the expenditure & office sought |
| The American Communications Group 847 Statens St. 1st Floor Herndon, VA 22070 | Creative design | 10-25-96 | \$ 2000 | Opposition to Senator Jesse Helms, S-C <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose |
| | | | | <input type="checkbox"/> Support <input type="checkbox"/> Oppose |
| | | | | <input type="checkbox"/> Support <input type="checkbox"/> Oppose |
| | | | | <input type="checkbox"/> Support <input type="checkbox"/> Oppose |
| | | | | <input type="checkbox"/> Support <input type="checkbox"/> Oppose |
| | | | | <input type="checkbox"/> Support <input type="checkbox"/> Oppose |
| SUBTOTAL of Itemized Independent Expenditures | | | \$ 2000 | |
| SUBTOTAL of Unitemized Independent Expenditures | | | \$ | |
| TOTAL Independent Expenditures | | | \$ 2000 | |

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the sending of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

[Signature] _____
 Date: 10-25-96

Submitted and sworn to before me this
 October 27, 1996


My Commission expires:
 2-12-99



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 type="checkbox"/> First Class Mail | POSTMARKED |
| <input checked="" type="checkbox"/> Registered/Certified Mail | POSTMARKED 1-31-94 |
| <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 | |
|  PREPARER | 2-9-91 DATE PREPARED |