

VIA OVERNIGHT MAIL**Paul R. Berry**
Vice President and
Assistant General Counsel

February 15, 1999

Ms. Debbie Chacona
Senior Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM
FEB 16 9 13 AM '99**Re: Identification No. C00281162**
October Quarterly Report (7/1/98-9/30/98) for the
Bayer Corporation Political Action Committee

Dear Ms. Chacona:

Your letter of November 18, 1998, to W. M. Weaver, Treasurer of the Bayer Corporation Political Action Committee has been referred to me for response. As a result of your November 18 letter, Bayer has undertaken a review of the records of its Political Action Committee. Specifically, you noted that Schedule B, supporting line 23, discloses a contribution to a candidate's 1998 Primary Election after said Primary Election had occurred.

Our review of the records discloses that this reporting error is the result of a clerical mistake in reporting by our BAYPAC administrative staff. From 1994 until December 31, 1997, BAYPAC had contributed \$6,000 to the Coverdell for Good Government Committee. Initially, all of this had been designated as "General" contributions even though some had been intended as support for the Senator's Primary Election efforts. Early in 1998, BAYPAC discovered these misclassifications which also obviously resulted in our contributions exceeding permissible levels. At this time, our PAC Executive Board instructed its Treasurer, Mr. Michael Weaver, to correct this reporting error, and on May 13, 1998, Mr. Weaver did so via letter to Ms. Debbie Manzano of your office (copy attached). At that point in time, the BAYPAC had designated contributions from May 25, 1995 (\$2,000) and February 17, 1997 (\$1,000) as being in support of Senator Coverdell's Primary Election campaign—a total of \$3,000 and the remainder (\$3,000) continued to be classified as being for Senator Coverdell's "General" Election campaign.

Bayer Corporation
100 Bayer Road
Pittsburgh, PA 15205-9741
Phone: 412 777-2188

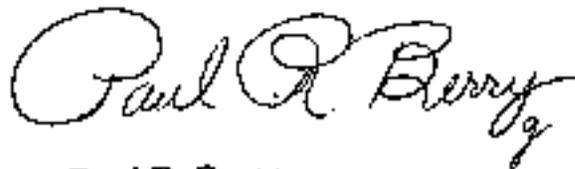
Ms. Debbie Chacona
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In the spring of 1998, another contribution (\$2,000) from BAYPAC to the Coverdell Good Government Committee was authorized. It should have been designated for the "General" Election campaign, but was erroneously marked as "Primary", thus giving rise to the error referenced in your letter of November 18. This was simply an administrative error resulting from the confusion caused by the earlier reporting correction with regard to the \$3,000 of "General" contributions.

We sincerely apologize for this error, caused by a simple mistake, and ask that you treat this letter as an amendment to the report on which that contribution appeared by designating the August 21, 1998, contribution of \$2,000 as for the "General" campaign.

Thank you for bringing this problem to our attention. If you require any additional information, please don't hesitate to contact me.

Best regards,



Paul R. Berry
Vice President and
Assistant General Counsel

Enclosure

cc: P. Caldwell
W. M. Weaver
R. L. White

PRB0817gmk

**Bayer Corporation Political
Action Committee**

c/o Bayer Corporation
100 Bayer Road
Pittsburgh, PA 15205-9741
Phone: 412 777-7817
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May 13, 1998

Ms. Debbie Manzano
Senior Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

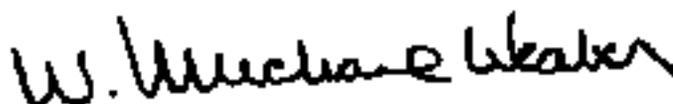
Re: Year End Report (10/1/97 - 12/31/97)

Dear Ms. Manzano:

I am in receipt of your letter regarding the Bayer Corporation Political Action Committee's November 14, 1997 contribution to The Coverdell Good Government Committee. While that contribution was properly reported, the committee's contributions on May 25, 1995 and February 17, 1997, should have been identified as primary election contributions. Please treat this letter as an amendment to the reports on which those contributions appeared.

Thank you for bringing this matter to our attention.

Sincerely,



W. Michael Weaver
Treasurer

PRB0623/gnk

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W. Michael Weaver

