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March 16, 1996

Ms. Debbie Manzano, Reports Analyst
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Re: St. Louisians for Better Government
Identification Number: C00148155
Mid-Year Report (1/1/95-6/30/95)

Dear Madam:

This is in response to your letter of inquiry dated February 7, 1996 prompted by the Commission's preliminary review of the Mid-Year Report (1/1/95-6/30/95) of St. Louisians for Better Government, a Political Action Committee of which the undersigned is treasurer. A copy of your letter is enclosed for your convenience.

Your inquiry concerns our "limited payments for administrative expenses." Please be advised that our organization is comprised entirely of individuals all of whom contribute funds within legal limits to further the political purpose for which it was formed. Some of those contributors voluntarily spend limited time in soliciting individuals to join with us in this effort. Those contributors elect a slate of officers from their ranks who volunteer for such service. Their function is to organize meetings with candidates and tend to whatever administrative needs of the organization there may be. Almost all of our meetings, whether administrative meetings or meetings with candidates, are held at the home of one or another of those individuals. Occasionally meetings are held at a restaurant or similar facility where each attendee pays for his or her own meal and shares other costs of the meeting, if any. Therefore, we incur no expense for rent or other expenses usually incurred by operating entities. Our expenses are limited to stationery, postage, and occasional long-distance charges, in addition to the services of a part-time administrative assistant. Almost all of her work for us is performed in her home except when she attends our meetings. Her compensation has been properly reported in our periodic reports to the Commission along with all other expenses incurred by the organization. Our administrative expenses appear to be limited because they are in fact limited. Any such expenses incurred but not paid in a reporting period have been disclosed as a debt on Schedule D if there were any.

No expenses have been paid by a "connected organization."

Any goods or services provided to our committee by any person, other than volunteer activities, have been disclosed in our periodic reports.

If you would like any further amplification or have additional questions concerning this matter, please contact me at your convenience.

Yours very truly,



Bernard Pasternak, Treasurer, St. Louisians for Better Government



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

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Bernard Pasternak, Treasurer
St. Louisians for Better Government
c/o Bernard Pasternak
41 Claverach Drive
St. Louis, MO 63105

FEB 7 1996

Identification Number: C00148155

Reference: Mid-Year Report (1/1/95-6/30/95)

Dear Mr. Pasternak:

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(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 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 provide the necessary information 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.

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,

Debbie Manzano

Debbie Manzano
Reports Analyst
Reports Analysis Division

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MRS
 PREPARER

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