FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3
July 14, 1994

Charles L. Ashley, Treasurer
A. Duda & Sons, Inc.
Political Action Committee
1975 W State Road 426
Oviedo, FL 32765

Identification Number: C00213231

Reference: Mid-Year (1/1/93-6/30/93) and Year End (7/1/93-12/31/93) Reports

Dear Mr. Ashley:

This letter is to inform you that as of July 13, 1994, the Commission has not received your response to our requests for additional information dated June 22, 1994. Those notices requested information essential to full public disclosure of your federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). Copies of our original requests are enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Neil Evans on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Charles L. Ashley, Treasurer
A. Dude & Sons, Inc.
Political Action Committee
1975 W State Road 426
Oviedo, FL 32765

JUN 22 1994

Identification Number: C00213231

Reference: Mid-Year Report (1/1/93-6/30/93)

Dear Mr. Ashley:

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:

-Please provide the total for Line 11(a)(iii), Columns A and B of the Detailed Summary Page.

-Line 21(a) should only be used to report the federal and non-federal shares of allocable activities. If your committee has only one account, the total operating expenditures (administrative expenses) should be reported on Line 21(b). Please amend your report to confirm the nature of your expenditures and to provide the total on the appropriate line.

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the amount deducted during the reporting period. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

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

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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,

Neil Evans
Reports Analyst
Reports Analysis Division

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PAYROLL DEDUCTIONS

SCHEDULE A — ITEMIZED RECEIPTS

Contributions from Individuals

PAGE OF

FOR LINE NUMBER 11(a)(i)

NAME OF COMMITTEE (in Full): National Organization PAC 000000001

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Anne Sullivan, 21 16th Street, City, State ZIP	National Organization, Inc. / Branch Manager	payroll deduction	$72.00 ($12 biweekly)
Aggregate Year-to-Date > $ 225.00			
Rodney Jones, 551 Hamsbury Road, City, State ZIP	National Organization, Inc. / Vice President	payroll deduction	$120.00 ($20 biweekly)
Aggregate Year-to-Date > $ 350.00			

Itemize payroll deductions only after they have exceeded $200 per calendar year from an individual.

IN-KIND CONTRIBUTIONS

SCHEDULE A — ITEMIZED RECEIPTS

Contributions from Individuals

PAGE OF

FOR LINE NUMBER 11(a)(i)

NAME OF COMMITTEE (in Full): National Organization PAC 000000001

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Martin L. Kress, 4 River Road, City, State ZIP	National Organization, Inc. / Chairman	5/19/92	$3,999.00 (IN-KIND) (RAFFLE PRIZE)
Aggregate Year-to-Date > $ 3,999.00			

SCHEDULE B — ITEMIZED DISBURSEMENTS

Operating Expenditures/Other Federal

PAGE OF

FOR LINE NUMBER 21(b)

NAME OF COMMITTEE (in Full): National Organization PAC 000000001

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Martin L. Kress, 4 River Road, City, State ZIP	raffle prize	5/19/92 (IN-KIND)	$3,999.00 CONTRIBUTION)

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

Payroll Deductions

Once an individual's deductions aggregate over $200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.8(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct $12 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarter schedule, includes the manager's contributions as "unitemized contributions" in its April and July quarterly reports. By June 30, the closing date for the July report, the manager's aggregate contributions are $195 — still below the $200 itemization threshold. By September 30 — the closing date for the October quarter report — the manager's contribution reach $228. Therefore, the committee itemizes the total contributions received from the manager during the third quarter ($120), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

In-Kind Contributions

When determining whether to item an *in-kind contribution*, follow the same guidelines listed above under "When to Itemize Receipts." See Chapter 2 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the kind contribution to the *operating expenditures* total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the in-kind contribution must itemized on Schedule A, then it must also be itemized on a Schedule B operating expenditures. See the illustration at right.

Appreciated Goods

When a committee receives an in-kind contribution whose value ma

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