FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Mark R. Johnson, Treasurer
Maersk Good Government Fund Maersk
Inc. Political Action Committee
P.O. Box 880
Madison, NJ 07940

JUL 11 2001

Identification Number: C00217471

Reference: July Quarterly Report (4/1/00-6/30/00)

Dear Mr. Johnson:

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:

-Schedule B discloses a contribution(s) towards the general election campaign of a Presidential candidate(s). Please note that contributions to Presidential candidates are governed by specific regulations. Please refer to the following explanation of Presidential election financing, and then amend your report to clarify this contribution(s).

All Presidential primary elections held during an election year are considered one election for the purpose of the contribution limits. A multi-candidate committee, therefore may give only $5,000 to a Presidential candidate's primary campaign, regardless of how many separate state Presidential primaries the candidate participates in. 11 CFR §§110.1(j)(1) and 110.2(i)(1)

In the general election, contributions to Presidential campaigns are not permitted if the candidate receives public funds. (An exception: Political committees may contribute to a publicly funded Presidential nominee's "compliance fund." A compliance fund is used solely for legal and accounting expenses incurred in complying with the election law. Gifts to compliance funds are considered contributions and are subject to usual per-candidate, per-election limits.) 11 CFR §9003.3(a)

-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 per pay period. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

-Please amend Schedule B supporting Line 23 by providing the office sought (i.e., House, Senate, or President) including the state and congressional district for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

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 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Scott Walker
Reports Analyst
Report Analysis Division

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20035722807

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Maersk Sealand Good Government Fund

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. New Republican Majority Fund 201 North Union St, Suite 530 Alexandria, VA 22314	Disbursement for: [ ] Primary [X] General [ ] Other (specify)	4/3/00	$5,000.00
B. Bob Franks for U.S. Senate P.O. Box 2056 Red Bank, NJ 07701	Disbursement for: [ ] Primary [X] General [ ] Other (specify)	4/7/00	$500.00
C. Frelinghuysen for Congress P.O. Box 826 Morristown, NJ 07963	Disbursement for: [ ] Primary [X] General [ ] Other (specify)	4/12/00	$500.00
D. Menendez for Congress, Inc. P.O. Box 848 Union City, NJ 07087	Disbursement for: [ ] Primary [X] General [ ] Other (specify)	5/16/00	$1,000.00
E. Bush for President, Inc. 319 1/2 A Street, NE Washington, DC 20002	Disbursement for: [ ] Primary [X] General [ ] Other (specify)	5/22/00	$5,000.00
F. David Vitter for Congress 2520 Metairie Road Metairie, LA 70001	Disbursement for: [ ] Primary [X] General [ ] Other (specify)	6/1/00	$500.00
G. Midnight Sun Political Action Cmte. c/o Jack Ferguson Assoc, Inc. 203 Maryland Ave, NE Washington, DC 20002	Disbursement for: [ ] Primary [X] General [ ] Other (specify)	6/14/00	$1,500.00
H. KOMPAC State Victory c/o Jane G. Matoon 6344 Cavalier Corridor Falls Church, VA 22044	Disbursement for: [ ] Primary [X] General [ ] Other (specify)	6/5/00	$1,000.00
I.	Disbursement for: [ ] Primary [ ] General [ ] Other (specify)		

SUBTOTAL of Disbursements This Page (optional) .....

TOTAL This Period (last page this line number only) $15,000.00

FFRM103

PAYROLL DEDUCTIONS

SCHEDULE A — ITEMIZED RECEIPTS

Contributions from Individuals

PAGE ___ OF ___ — FOR LINE NUMBER 11(a)(i)

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NAME OF COMMITTEE (in Full): National Organization PAC C00000001

Full Name, Mailing Address and Zip Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Anne Sullivan 31 16th Street City, State ZIP Receipt For: ☐ Primary ☐ General ☐ Other (specify)	National Organization, Inc. Branch Manager Aggregate Year-to-Date > $ 195.00	payroll deduction	$90.00 ($15 biweekly)
Rodney Jones 681 Helmsbury Road City, State ZIP Receipt For: ☐ Primary ☐ General ☐ Other (specify)	National Organization, Inc. Vice President Aggregate Year-to-Date > $ 390.00	payroll deduction	$180.00 ($30 biweekly)

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)

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NAME OF COMMITTEE (in Full): National Organization PAC C00000001

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 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	National Organization, Inc. Chairman Aggregate Year-to-Date > $ 3,999.00	8/19/94	$3,999.00 (IN-KIND) (RAFFLE PRIZE)

SCHEDULE B — ITEMIZED DISBURSEMENTS

Operating Expenditures/Other Federal

PAGE ___ OF ___ — FOR LINE NUMBER 21(b)

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NAME OF COMMITTEE (in Full): National Organization PAC C00000001

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 Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	8/19/94 (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 $15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions ($90 for six pay periods) as "unitemized contributions" on Line 11(a)(ii) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are $195—still below the $200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach $285. Now the committee itemizes the total contributions received from the manager during the third quarter ($90), providing the year-to-date total in the appropriate space. (See Item A in the illustration above.)

In-Kind Contributions

When determining whether to itemize an *in-kind contribution*, follow the same guidelines listed above under "When to Itemize Receipts." See page 8 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-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 be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at left.