

TRSA

TEXTILE RENTAL SERVICES ASSOCIATION OF AMERICA

1000 Pennsylvania Avenue, N.W., Washington, D.C. 20004-1101

RECEIVED
FEB 11 1994

Headquarters:

December 29, 1993

JAN 4 10 39 AM '94

Ms. Amy Suzanne Reynolds
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Reynolds:

This is in response to your letter dated December 8, 1993 for the Textile Rental Services Association of America Political Action Committee (TSAPAC), Identification No. COO279828.

The money we received from the Textile and Uniform Rental Association Political Action Committee (TURAPAC) was a transfer of funds. These two pacs - TURAPAC and TRSAPAC were related.

The money was transferred from TRSAPAC originally to TURAPAC. The receipt of \$31,851.85 from TURAPAC, in effect, is a re-transfer of the funds back to TRSAPAC.

Sincerely,

John J. Contney
John J. Contney
Executive Director

JJC/ss

P.S. I am enclosing copies of correspondence addressed to C.J. Schafer, Treasurer of the Civic Action Fund which was included in the mail to me in error.

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2 PACs were
many more & recently



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

John J. Contney, Treasurer
Textile Rental Services Association
of America Political Action
Committee (TRSAPAC)
1130 East Hallandale Beach Blvd.
Hallandale, FL 33009

DEC 8 1993

Identification Number: C00279828

Reference: Amended Mid-Year Report (1/1/93-6/30/93), dated
12/1/93

Dear Mr. Contney:

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 A supporting Line 11(c) of your report (pertinent portion attached) discloses a \$31,851.85 receipt from the Textile & Uniform Rental Association Political Action Committee (TURAPAC). A review of the reports of receipts and disbursements filed by the TURAPAC indicate that the \$31,851.85 may have been intended for the non-federal account of your committee. The Act precludes a committee from receiving contributions from another political committee in excess of \$5,000 per calendar year (2 U.S.C. §441(a)(f)).

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeds the limits, you should either refund to the donor the amount in excess of \$5,000 or, if appropriate, seek reattribution of the contribution pursuant to 11 CFR §110.1(k). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests. (11 CFR §§103.3(b) and 110.1(k))

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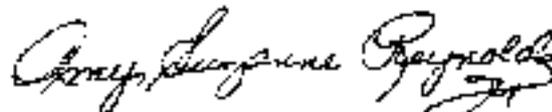
Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In the best interests of the committee, all refunds, reattributions and transfers-out should be made within sixty (60) days of the treasurer's receipt of the contribution. See 11 CFR §103.3(b). Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 28 or 22 of the report covering the period during which they are made. Reattributions are reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received.

If on the other hand, TURAPAC is affiliated with your committee, please clarify this relationship in writing and amend Line 6 of your Statement of Organization to identify it as an affiliated committee. For future reporting, be aware that transfers received from affiliated committees should properly be disclosed on Schedule A supporting Line 12 of the Detailed Summary Page.

Although the Commission may take further legal steps regarding the acceptance of an excessive contribution(s), prompt action by you to refund, seek reattribution and/or transfer-out the excessive amount will be taken into consideration.

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,



Amy Suzanne Reynolds
Reports Analyst
Reports Analysis Division

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SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 1 OF 1
FOR LINE NUMBER
11C

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) **Textile Rental Services Association of America Political Action Committee (TRAPAC)**

| A. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this Period |
|---|------------------|---------------------------------------|------------------------------------|
| Textile & Uniform Rental Association Political Action Committee (TURAPAC) 1730 M Street, N.W., Suite 610 Washington, D.C. 20036 | | 2/8/93 | 31,851.85 |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation | Aggregate Year-to-Date > \$ 31,851.85 | |
| B. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this Period |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation | Aggregate Year-to-Date > \$ | |
| C. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this Period |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation | Aggregate Year-to-Date > \$ | |
| D. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this Period |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation | Aggregate Year-to-Date > \$ | |
| E. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this Period |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation | Aggregate Year-to-Date > \$ | |
| F. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this Period |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation | Aggregate Year-to-Date > \$ | |
| G. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this Period |
| Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation | Aggregate Year-to-Date > \$ | |

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SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only) **\$31,851.85**

**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.

Hand Delivered

DATE OF RECEIPT

First Class Mail

POSTMARKED

12-30-92

Registered/Certified Mail

POSTMARKED

No Postmark

Postmark Illegible

Received from the House Office of Records
 and Registration

DATE OF RECEIPT

Received from the Senate Office of Public
 Records

DATE OF RECEIPT

Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

JM H
 PREPARER

1-11-93
 DATE PREPARED

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