FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Joseph M. Urbani, Treasurer
Elf Atochem North America Inc.
Political Action Committee
(ATOPAC)
2000 Market Street
Philadelphia, PA 19103

SEP 7 1994

Identification Number: C00182980

Reference: Year End Report (7/1/93-12/31/93)

Dear Mr. Urbani:

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:

-The identification of each contributor, including the person's occupation and name of employer, must be provided if the person has contributed in excess of $200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry lacking a contributor's occupation.

Note: If your committee has made attempts, either by a written request or by an oral request documented in writing to obtain this information from each contributor, your committee may have exercised "best efforts." Under revised 11 CFR 104.7(b), such effort shall consist of an initial clear and conspicuous request for the name, mailing address, occupation, and name of employer of each individual who has contributed over $200 in the calendar year <u>which informs the contributor that the reporting of such information is required by law</u>. If necessary, your committee must make a written follow-up request or an oral follow-up request documented in writing, within thirty days with no additional solicitation. Subsequently, the committee should report any changes provided by the contributor or any additional information which is in the committee's records. If you believe that your committee satisfies the "best efforts" provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contribution information. Clarification regarding "best efforts" should be disclosed <u>during each two year election cycle</u> beginning with the first report filed in the non-election year. 11 CFR §104.3(a)(4)(i)

-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.

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,

Erica D. Holder

Erica Holder
Reports Analyst
Reports Analysis Division

255

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED FEDERAL ELECTION COMMISSION

SEP 19 11 54 AM '94

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full)

C00182983 12U293 n 241
JOSEPH M URBANI
ILP ATIC&PM NORTH AMERICA INC
POLITICAL ACTION COMMITTEE CAT
2000 MARKET ST
PHILADELPHIA PA 19103

2. FEC IDENTIFICATION NUMBER

3. [X] This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

4. TYPE OF REPORT

(a) [ ] April 15 Quarterly Report
[ ] July 15 Quarterly Report
[ ] October 15 Quarterly Report
[X] January 31 Year End Report
[ ] July 31 Mid Year Report (Non-election Year Only)
[ ] Termination Report

Monthly Report Due On:

[ ] February 20	[ ] June 20	[ ] October 20
[ ] March 20	[ ] July 20	[ ] November 20
[ ] April 20	[ ] August 20	[ ] December 20
[ ] May 20	[ ] September 20	[ ] January 31

[ ] Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

[ ] Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? [X] YES [ ] NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period July 1 through December 31, 1993		
6. (a) Cash on Hand January 1, 19 93		$ 5,727
(b) Cash on Hand at Beginning of Reporting Period	$ 8,471	
(c) Total Receipts (from Line 19)	$ 5,066	$ 12,325
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 13,537	$ 18,052
7. Total Disbursements (from Line 30)	$ 5,750	$ 10,265
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 7,787	$ 7,787
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$ -0-	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-219-3420

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer
Joseph M. Urbani

Signature of Treasurer
Joseph M Urbani

Date
1/27/94

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 9/93)

94039.2.437

DETAILED SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS
PAGE 2, FEC FORM 3X

(revised 1/1/91)

NAME OF COMMITTEE: Elf Atochem N.A. Political Action Committee

REPORT COVERING PERIOD FROM 7/1/93 TO 12/31/93

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year
11. Contributions (other than loans) From:		
a. Individual/Persons Other Than Political Committees		
i. Itemized (use Schedule A)	3,365	4,825
ii. Unitemized	1,701	7,500
iii. Total (add i and ii) ➤	5,066	12,325
b. Political Party Committees		
c. Other Political Committees (such as PACs)		
d. Total Contributions (add a iii, b and c) ➤	5,066	12,325
12. Transfers From Affiliated/Other Party Committees		
13. All Loans Received		
14. Loan Repayments Received		
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)		
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees		
17. Other Federal Receipts (Dividends, Interest, etc.)		
18. Transfers from Nonfederal Account for Joint Activity		
19. Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18) ➤	5,066	12,325
20. Total Federal Receipts (subtract line 18 from line 19) ➤	5,066	12,325
II. Disbursements		
21. Operating Expenditures:		
a. Shared Federal/Non-Federal Activity (from Schedule H4)		
i. Federal Share		
ii. Non-Federal Share		
b. Other Federal Operating Expenditures		
c. Total Operating Expenditures (add a i, a ii, and b) ➤	-0-	-0-
22. Transfers to Affiliated/Other Party Committees		
23. Contributions to Federal Candidates/Committees and Other Political Committees	5,750	10,250
24. Independent Expenditures (use Schedule E)		
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F)		
26. Loan Repayments Made		
27. Loans Made		
28. Refunds of Contributions To:		
a. Individuals/Persons Other Than Political Committees		
b. Political Party Committees		
c. Other Political Committees (such as PACs)		
d. Total Contribution Refunds (add a, b and c) ➤		
29. Other Disbursements		15
30. Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) ➤	5,750	10,265
31. Total Federal Disbursements (subtract line 21 a ii from line 30) ➤	5,750	10,265
III. Net Contributions/Operating Expenditures		
32. Total Contributions (other than loans)(from line 11d)	5,066	12,325
33. Total Contribution Refunds (from line 28d)	-0-	-0-
34. Net Contributions (other than loans)(subtract line 33 from 32)	5,066	12,325
35. Total Federal Operating Expenditures (add 21 a i and 21 b) ➤	-0-	-0-
36. Offsets to Operating Expenditures (from line 15)	-0-	-0-
37. Net Operating Expenditures (subtract line 36 from 35) ➤	-0-	-0-

SCHEDULE A **ITEMIZED RECEIPTS**

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

PAGE 3 OF 8

FOR LINE NUMBER 11 a.i.

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)

Elf Atochem N.A. Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
John M. Bart 128 West Devon Drive Exton, PA 19341 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Manager - Strategic Planning Aggregate Year-to-Date > $ $220	$10 Bi-weekly Payroll Deduction	$ 90
B. Full Name, Mailing Address and ZIP Code Joseph Michael Bohen 540 Norwyck Drive King of Prussia, PA 19406 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Technical Manager Aggregate Year-to-Date > $ 220		90
C. Full Name, Mailing Address and ZIP Code John Cioffi 57 Warren Place Middletown, NJ 07748 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Sales Manager Aggregate Year-to-Date > $ 220		90
D. Full Name, Mailing Address and ZIP Code James E. Comstock 1215 Karen Lane Westchester, PA 19380 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Product Manager Aggregate Year-to-Date > $ 220		90
E. Full Name, Mailing Address and ZIP Code Douglas L. Cox 1220 Rodman Street Philadelphia, PA 19147 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: CFO Aggregate Year-to-Date > $ 320	$15 bi-weekly	135
F. Full Name, Mailing Address and ZIP Code Robert J. De Boer 15 Heron Court Medford, NJ 08055 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Director - Purchasing Aggregate Year-to-Date > $ 220		90
G. Full Name, Mailing Address and ZIP Code Anthony P. DeLuca 224 Trianon Lane Villanova, PA 19085 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: SVP of H.R. Aggregate Year-to-Date > $ 220		90

SUBTOTAL of Receipts This Page (optional) $675

TOTAL This Period (last page this line number only) .....

9 4 0 3 2 1 4 2 9

SCHEDULE A **ITEMIZED RECEIPTS**

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

PAGE 4 OF 8

FOR LINE NUMBER N.a.i.

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NAME OF COMMITTEE (in Full)

Elf Atochem N.A. Political Action Committee

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. Dietmar Fuchs 26 Sugar Knoll Evon, PA 19333 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Sales Manager Aggregate Year-to-Date: $ 220.00	$10 Bi-Weekly Payroll Deduction	$ 90
B. David B. Fultz Tree Tops Porteous Road Berwyn, PA 19312 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Product Manager Aggregate Year-to-Date: $ 220		90
C. Jimmie R. Hodges Rt 2 Box 397 Benton, KY 42025 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Plant Manager Aggregate Year-to-Date: $ 220		90
D. Richard Holcombe 609 Overhill Road Ardmore, PA 19003 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Product Manager Aggregate Year-to-Date: $ 220		90
E. Charles A. Kitchen 213 W. Woodland Ave. Springfield, PA 19064 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Manager - Government Relations Aggregate Year-to-Date: $ 220		90
F. William M. Kraus 148 Jericho Valley Drive Wrightstown, PA 18940 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Group President Aggregate Year-to-Date: $ 220		90
G. Robert LeBlanc 4 Totten Drive Bridgewater, NJ 08807 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Executive V.P. Aggregate Year-to-Date: $ 220		90

SUBTOTAL of Receipts This Page (optional) $630

TOTAL This Period (last page this line number only) .....

9 4 0 3 9 2 1 4 4 0

SCHEDULE A **ITEMIZED RECEIPTS**

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

PAGE 5 OF 8

FOR LINE NUMBER 11.a.i.

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NAME OF COMMITTEE (In Full)

Elf Atochem N.A. Political Action Committee

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. James L. Marr 118 Yarmouth Lane Media, PA 19063 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Product Manager Aggregate Year-to-Date > $ 220	$10 Bi-weekly Payroll Deduction	$ 90
B. Charles W. McCarrick Jr. 19 Ashton Drive Voorhees, NJ 08043 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Technical Manager Aggregate Year-to-Date > $ 220		90
C. Peter J. McCarthy 2704 Bodine Drive Wilmington, DE 19810 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: V.P. - Public Affairs Aggregate Year-to-Date > $ 220		90
D. Edward J. McGinn 3102 W Penn St. Phila., PA 19129 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Director - Labor Relations Aggregate Year-to-Date > $ 495	$2 bi-weekly	225
E. Wayne L. O'Quin 2231 Haden Road Houston, TX 77015 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Manager - Government Relations Aggregate Year-to-Date > $ 220		90
F. Thomas C. Parrillo 8 Ferguson Court Evesham, NJ 08053 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Product Manager Aggregate Year-to-Date > $ 220		90
G. Joseph P. Pesce 142 Indian Lane Media, PA 19063 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Tax Director Aggregate Year-to-Date > $ 220		90

SUBTOTAL of Receipts This Page (optional) $765

TOTAL This Period (last page this line number only) .....

9 4 0 3 2 . 2 1 4 4 1

SCHEDULE A

ITEMIZED RECEIPTS

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

FOR LINE NUMBER: 11.a.i.

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NAME OF COMMITTEE (In Full)

Elf ATochem N.A. Political Action Committee

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Seymour S. Preston III 330 N. Dutton Mill Road West Chester, PA 19380 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: CEO & President Aggregate Year-to-Date > $ 1,210	$60 Bi-weekly Payroll Deduction	$ 540
David B. Russell 1260 Quarry Commons Yardley, PA 19067 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Sales Manager Aggregate Year-to-Date > $ 220	$10 bi-weekly	90
Andrea E. Utecht 106 Pine Street Philadelphia, PA 19106 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: V.P. - Law Aggregate Year-to-Date > $ 220		90
Arthur Van Nostrand 1416 Revere Road Yardley, PA 19067 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Director - Financial Analysis Aggregate Year-to-Date > $ 320	$15 bi-weekly	135
Fred W. Veil 131 Lenape Drive Berwyn, PA 19312 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem NA. Occupation: Asst. General Counsel Aggregate Year-to-Date > $ 220	$10 bi-weekly	90
Michael Wells 4 Menlo Drive Whitehouse Station, NJ 08889 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation: Sales Manager Aggregate Year-to-Date > $ 210		80
Michael E. Schu 2 Cold Spring Lane Media, PA 19063 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Environmental Law Aggregate Year-to-Date > $ 220		90

SUBTOTAL of Receipts This Page (optional) $1,115

TOTAL This Period (last page this line number only) .....

9 4 0 3 9 : 2 1 4 4 2

SCHEDULE A **ITEMIZED RECEIPTS**

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

PAGE 7 OF 8

FOR LINE NUMBER 11.a.1.

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NAME OF COMMITTEE (In Full)

Elf Atochem N.A. Political Action Committee

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. Gerard F. Whelan 133 Ashford Road Cherry Hill, NJ 08003 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Director - Customer Service Aggregate Year-to-Date: $ 220	$10 Bi-weekly Payroll Deduction	$ 90
B. A. Henry Williams 14311 Wandering Woods Drive Houston, TX 77015 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Plant Manager Aggregate Year-to-Date: $ 220		90
C. Ronnie Lohr 1715 Wyndale Ct. Richmond, TX 77469 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Elf Atochem N.A. Occupation: Regional Sales Manager Aggregate Year-to-Date: $ 260	4/14/93	0
D. William J. Vinci 163 Westbrooke Drive Clifton Heights, PA 19018 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation: Financial Analyst Aggregate Year-to-Date: $ 260	4/22/93	0
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date: $	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date: $	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date: $	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)	180
TOTAL This Period (last page this line number only)	$3,365

9 4 0 3 9 2 4 4 3

SCHEDULE B **ITEMIZED DISBURSEMENTS**

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

FOR LINE NUMBER 23

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NAME OF COMMITTEE (In Full)

Elf ATochem N.A. Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Tom Foley 555 New Jersey Avenue, Ste 201 Washington, D.C. 20001	Fundraiser Disbursement for: [ ] Primary [X] General [ ] Other (specify)	7/30/93	$ 500.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bruce S. Marks 7035 Lynford Street Philadelphia, PA 19149-1715	Fundraiser Disbursement for: [ ] Primary [X] General [ ] Other (specify)	7/30/93	500.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Tom Barlow 555 New Jesey Avenue, NW Suite 201 Washington, D.C. 20001	Fundraiser Disbursement for: [ ] Primary [X] General [ ] Other (specify)	9/22/93	500.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Mike Kopetski PO Box 15259 Washington, DC 20003	Fundraiser Disbursement for: [ ] Primary [X] General [ ] Other (specify)	9/22/93	500.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Jim Bunning PO Box 40175 Washington, DC 20016	Fundraiser Disbursement for: [ ] Primary [X] General [ ] Other (specify)	9/28/93	750.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bill Paxon PO Box 1995 Williamsville, NY 14231	Fundraiser Disbursement for: [ ] Primary [X] General [ ] Other (specify)	10/12/93	500.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Michael Andrews PO Box 2884 Washington, DC 20013	Fundraiser Disbursement for [ ] Primary [X] General [ ] Other (specify)	10/19/93	1,000.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Curt Weldon 234 Finnegan Drive Millersville, MD 21108	Fundraiser Disbursement for: [ ] Primary [X] General [ ] Other (specify)	10/19/93	500.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
George J. Hochbrueckner PO Box 426 Coram, NY 11727	Fundraiser Disbursement for: [ ] Primary [X] General [ ] Other (specify)	11/22/93	1,000.00

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

TOTAL This Period (last page this line number only) $5,750.00

9 4 0 5 7 - 2 1 4 4 4

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 9-16-94
☐	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

JMH
PREPARER

9-19-94
DATE PREPARED

FEC FORM 70 2 (12/92)

9 4 0 3 9 2 1 4 4 5