



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

DEC 10 1997

Roger C. Myers Jr., Treasurer
AOPA Legislative Action PAC
500 E Street SW, Suite 920
Washington, DC 20024

Identification Number: C00309856

Reference: Mid-Year Report (1/1/97-6/30/97)

Dear Mr. Myers:

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 of your report discloses a negative disbursement of funds involving your connected organization (pertinent portion attached). 2 U.S.C. §441b prohibits the receipt of funds from national banks, corporations, and labor organizations. Under 11 CFR §114.5(b)(3), however, a separate segregated fund may be reimbursed for any solicitation or other administrative expense provided that the reimbursement is made no later than thirty days after the expense was paid by the separate segregated fund.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. Please provide further clarifying information regarding the date(s) on which the committee made payments for any solicitation or other administrative expenses. To the extent that the reimbursement was made beyond thirty days, your committee must transfer the funds to an account not used to influence federal elections or refund the full amount to your connected organization in accordance with 11 CFR §103.3(b). The Commission recommends that you inform your connected organization in writing to provide them with the option of receiving a refund or granting written authorization of a transfer-out to protect the donor's interest.

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Please inform the Commission of your corrective action immediately in writing and provide a copy of your check for the transfer-out or refund. In addition, any transfer-out or refund made should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the date on which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to refund or transfer-out the amount will be taken into consideration.

-Schedule D of your report discloses previously unreported debts that omit a total for the amount incurred this period. Please amend your report to provide this missing information.

-Your report discloses activity that falls outside the reporting period. Please amend this report by including only the financial transactions that occurred between January 1, 1997 and June 30, 1997. Any activity occurring outside this reporting period should be included in the appropriate report(s). 2 U.S.C. §434(b)

-Line 9 of the Summary Page of your report discloses a total of \$1,436 in debts and obligations owed to the Committee. The sum of the entries itemized on Schedule D, however, indicates the total to be \$758. Please amend your report to clarify the discrepancy.

-Line 10 of the Summary Page of your report discloses a total of \$40,384 in debts and obligations owed by the Committee. The sum of the entries itemized on Schedule D, however, indicates the total to be \$31,896. Please amend your report to clarify the discrepancy.

-You must make an attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

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A committee may demonstrate "best efforts" to obtain the required information by providing the Commission with a description of its procedures for requesting the information and may also supply a copy of a solicitation: the committee must request the contributor information in initial solicitations; make follow-up requests (if necessary); report the information; and file amendments to disclose previously unreported information. Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make an additional written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle. Furthermore, if a committee receives contributor information after the contributions have been reported, it must submit, with its next report, an amended memo Schedule A listing all the contributions for which additional information was received or file, on or before the next reporting date, amendments to the previous reports on which the contributions were originally disclosed. See 11 CFR §104.3(a)(4)(i) and 11 CFR §104.7.

-On Schedule A supporting Line 11(a)(i) of the Detailed Summary Page, your report disclosed contributions from individuals that omit the dates of receipt. Please amend your report by supplying the information. 11 CFR §104.3(a)(4)(i)

-Please amend your report by providing the date disbursement for each disbursement itemized on Schedule B supporting Line 21(b).

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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,

A handwritten signature in cursive script that reads "Andrew Dodson". The signature is written in black ink and is positioned above the printed name.

Andrew J. Dodson
Senior Reports Analyst
Reports Analysis Division

SCHEDULE B

Use separate schedule(s) for each category of the Detailed Summary Page	PAGE 8 OF 8 FOR LINE # 216
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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)

AOPA Legislative Action Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (Mth, day, yr)	Amount of Each Disbursement This Period
AOPA 421 Aviation Way Frederick, MD 21701	Mutual Service Charge Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	May-97	4,032.60
B. Full Name, Mailing Address and ZIP Code IRS Philadelphia, PA 19256	Taxes Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	February-97	1,141.00
C. Full Name, Mailing Address and ZIP Code Federal Express P.O. Box 1140 Memphis, TN 38101-1140	Mail Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	June-97	7.91
D. Full Name, Mailing Address and ZIP Code			
E. Full Name, Mailing Address and ZIP Code Barry Blau 848 Fairmont Avenue, Suite 200 Towson, MD 21286	Marketing Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	December-86	6,417.00
F. Full Name, Mailing Address and ZIP Code Fairmont Hotel 170 S Market Street San Jose, CA 95113-2395	Meeting/Convention Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	December-86	10,233.12
G. Full Name, Mailing Address and ZIP Code Yodice 500 E Street SW, Suite 820 Washington, DC 20024	Legal Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	December-86	450.00
H. Full Name, Mailing Address and ZIP Code San Jose Convention Bureau 333 W San Carlos Street San Jose, CA 95140	Convention Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)		605.00
I. Full Name, Mailing Address and ZIP Code AOPA 421 Aviation Way Frederick, MD 21701	Overpayment of Mutual Service Charge Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	December-86	(8,526.25)
SUBTOTAL of Disbursements This Page (Optional).....>>			13,358.25
TOTAL This Period (last page this line number only).....>>			216,054.25

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