



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

RQ-2

Jerome E. Fox, Jr., Treasurer
Invacare Corporation Political Action
Committee AKA INVA PAC
One Invacare Way
Elyria, OH 44035

OCT 16 2002

Identification Number: C00249896

Reference: July Quarterly Report (4/1/02-6/30/02)

Dear Mr. Fox:

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:

-Your report discloses cash contributions from several contributors totaling \$13,000. Please be advised that contributions exceeding \$100 must be made by check (or other written instrument). 11 CFR 110.4(c) Please return the amount over \$100 to each contributor and disclose the refunds on the appropriate report(s).

-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 response or 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. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. 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,



Jane Parks
Campaign Finance Analyst
Reports Analysis Division

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PAYROLL DEDUCTIONS

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS		FOR LINE NUMBER: PAGE 32
Use separate schedule for each category of the Detailed Summary Page.		1a <input type="checkbox"/> 1b <input type="checkbox"/> 1c <input type="checkbox"/> 1d <input type="checkbox"/> 1e <input type="checkbox"/> 1f <input type="checkbox"/> 1g <input type="checkbox"/> 1h <input type="checkbox"/> 1i <input type="checkbox"/> 1j <input type="checkbox"/>
Any information derived from this report and Schedule A may not be sold or used by any person for the purpose of soliciting contributions or for political purposes, other than using the name and address of any political committee or other organization from such committee.		
NAME OF CONTRIBUTOR (in full)		
Central Region, Inc. P.O. Full Name (Last, First, Middle Initial)		
A. <input type="checkbox"/> Self-Employed Mailing Address 12345 Main St. City State ZIP Code		Date of Receipt Month Day Year 01 01 2000
Full ID number of contributor (leave public committee) 1234567890		Amount of Each Itemized for Period \$15.00 (\$15.00/Week) *
Name of Employer Central Region, Inc.		Occupation Executive Officer
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> Other <input type="checkbox"/> Other (Specify)		Aggregate Year-to-Date * \$90.00

*Adding Extra Text/Explanation: When using FECFile electronic filing software, this information can be entered using the "memo text" window. To make a "memo text" entry, select the "View" menu on the FECFile toolbar. Select "All Transactions." Single click (highlight) the transaction to which the "memo text" will be attached. Then select the "File" menu on the toolbar and select "Memo Text."

*When using FECFile electronic filing software, enter this information in the "description" field.

Categorizing Receipts

Before beginning to itemize the committee's receipts, separate them into the different categories listed on the Detailed Summary Page ("Contributions from Individuals," "Contributions from Political Committees," etc.); an illustration of a completed Detailed Summary Page appears on pages 54-55. The receipts in each category must be itemized on a separate Schedule A designated for that category.

Indicate the type of receipt itemized on a particular Schedule A by checking the box for the corresponding line number from the Detailed Summary Page where indicated in the upper right corner of the schedule. The appropriate category of receipt may also be written at the top of each page.

Some categories may require several pages. The total for each category should be entered on the bottom line of the last page for that category.

Itemized Information

For each itemized contribution, provide:

- The full name and address (including zip code) of the contributor or other source;
- The name of the contributor's employer (if the contributor is an individual);

- The contributor's occupation (if the contributor is an individual);
- The date of receipt;
- The amount; and
- The aggregate year-to-date total of all receipts (within the same category) from the same source, 104.3(a)(3). The space indicating the election for which an itemized contribution was made ("Receipt For") does not apply to SSFs; leave those boxes blank.

Special "Employer" Information

If a contributor is self-employed, that should be recorded in the Employer space. If a contributor is not employed, the Employer space should be left blank, but the Occupation space should always be completed (e.g., "unemployed," "retired," "homemaker").

Best Efforts Required

Note that committees and their treasurers must use "best efforts" to obtain and report the information listed above. See page 56 for more information.

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, type "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor, 104.3(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)(5) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 19 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.)

PAYROLL DEDUCTIONS

SCHEDULE A (FEC Form 3X)		FOR LINE NUMBER		PAGE	
ITEMIZED RECEIPTS		1		1	
Use separate schedule(s) for each category or the Detailed Summary Page.		FOR LINE NUMBER (same as on Form 3X)		PAGE	
Any information obtained from such reports and statements may not be sent or used by any person for the purpose of soliciting contributions or for commercial purposes. (SEE ITEM 1000) The above list of names of any political activities to solicit contributions from such committee.		13		17	
NAME OF COMMITTEE (in full)					
Critical Reason Inc. PAC					
Full Name (Last, First, Middle Initial)					
A. <u>Wage Income</u>					
Name/Address					
3. Schenck Ave.					
City					
Kearneyville					
State					
VA					
Zip Code					
21333					
FEC ID number of committee					
CA					
Name of Employer					
Critical Reason Inc.					
Occupation					
MANAGER					
Aggregate Year-to-Date*					
285.00					
Date of Receipt					
11/15/99					
Amount of Cash Receipt for Period					
90.00					
(\$15 biweekly)**					
Receipt No:					
Priority <input type="checkbox"/> General <input type="checkbox"/>					
Other Specify: <input type="checkbox"/>					

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**When using FECFile electronic filing software, enter this information in the "description" field.

Categorizing Receipts

Before beginning to itemize the committee's receipts, separate them into the different categories listed on the Detailed Summary Page ("Contributions from Individuals," "Contributions from Political Committees," etc.; an illustration of a completed Detailed Summary Page appears on pages 54-55). The receipts in each category must be itemized on a separate Schedule A designated for that category.

Indicate the type of receipt itemized on a particular Schedule A by checking the box for the corresponding line number from the Detailed Summary Page where indicated in the upper right corner of the schedule. The appropriate category of receipt may also be written at the top of each page.

Some categories may require several pages. The total for each category should be entered on the bottom line of the last page for that category.

Itemized Information

For each itemized contribution, provide:

- The full name and address (including zip code) of the contributor or other source;
- The name of the contributor's employer (if the contributor is an individual);

- The contributor's occupation (if the contributor is an individual);
- The date of receipt;
- The amount; and
- The aggregate year-to-date total of all receipts (within the same category) from the same source. 104.3(a)(3). The space indicating the election for which an itemized contribution was made ("Receipt For") does not apply to SSFs; leave those boxes blank.

Special "Employer" Information

If a contributor is self-employed, that should be recorded in the Employer space. If a contributor is not employed, the Employer space should be left blank, but the Occupation space should always be completed (e.g., "unemployed," "retired," "homemaker").

Best Efforts Required

Note that committees and their treasurers must use "best efforts" to obtain and report the information listed above. See page 36 for more information.

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, type "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), 12 pay periods have passed, and the manager's aggregate contributions are \$180—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), 18 pay periods have passed, and the manager's contributions reach \$270. 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.)

4-5-2014 15:00:00