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WASHINGTON POLITICAL ACTION COMMITTEE

444 NORTH CAPITOL STREET, N.W.
SUITE 345
WASHINGTON, D.C. 20001

RECEIVED
FEC MAIL
OPERATIONS CENTER
TELEPHONE
(202) 347-5859
E-MAIL
mja@washingtonpac.com
WEBSITE
washingtonpac.com

2006 MAY 15 A 8:08

May 9, 2005

Ms. Katrina Senger
Federal Election Commission
999 E Street, NW
Washington, DC 20463

ID # C00138560
Ref. April Quarterly Report (1/1/06 - 3/31/06)

Dear Ms. Senger:

This is in response to your letter of May 5 citing "limited payments for administrative expenses". As we have indicated on numerous occasions to similar FEC inquiries, we believe in this instance that \$10,373 in operating expenditures on receipts of \$94,048 and disbursements of \$49,373 constitute adequate payments for "administrative expenses".

Aside from our itemization of costs incurred for printing, postage, catering, computer and conference room rentals, we note a \$2,000 monthly payment to the firm of Morris J. Amitay, P.C. to cover any other possible costs connected to administration of the PAC - e.g. record keeping, solicitation letters, telephone use, rent and utilities.

I am unaware of any FEC guidelines as to what minimal percentage of receipts is considered adequate and feel that the purpose of a PAC is to raise funds in order to contribute to candidates' campaigns, not to incur expensive overhead.

Please advise as to the adequacy of this response.

With best wishes,

Sincerely,

Morris J. Amitay
Treasurer

26039080607



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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2006 MAY 15 A 8:08

May 5, 2006

Morris J. Amitay, Treasurer
Washington Political Action Committee
444 North Capitol St NW, Suite 712
Washington, DC 20001

**Response Due Date:
June 5, 2006**

Identification Number: C00138560

Reference: April Quarterly Report (1/1/06-3/31/06)

Dear Mr. Amitay:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Your 2006 April Quarterly Report (1/1/06-3/31/06) discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule(s) B supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more.
11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two-year election cycle beginning with the first report filed in the

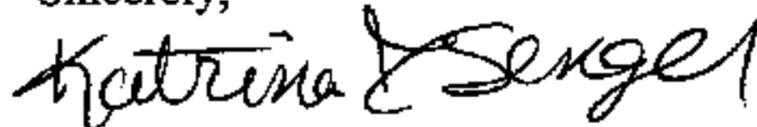
26039080608

non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If volunteers have provided these services, please confirm this in writing.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

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 should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1137.

Sincerely,



Katrina Senger
Campaign Finance Analyst
Reports Analysis Division

Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
 The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> USPS First Class Mail	Postmarked <i>5-10-06</i>
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
Delivery Confirmation™ or Signature Confirmation™ Label <input type="checkbox"/>	
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
Next Business Day Delivery <input type="checkbox"/>	
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
<i>Jmw</i> PREPARER	<i>5-15-06</i> DATE PREPARED

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