



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

April 3, 1997

Peter J. Marzullo, Treasurer
Lorillard Public Affairs Committee
One Park Avenue
New York, NY 10016

Identification Number: C00112888

Reference: Year End Report (11/26/96-12/31/96)

Dear Mr. Marzullo:

This letter is to inform you that as of April 2, 1997, the Commission has not received your response to our request for additional information, dated March 12, 1997. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Jennifer Wall on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

A handwritten signature in cursive script that reads "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Peter J. Marzullo, Treasurer
Lorillard Public Affairs Committee
One Park Avenue
New York, NY 10016

MAR 12 1997

Identification Number: C00112888

Reference: Year End Report (11/26/96-12/31/96)

Dear Mr. Marzullo:

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:

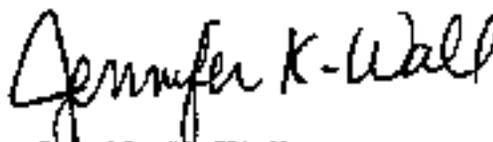
-The totals listed on Lines 11(a)(i) and 11(a)(ii), Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. When an individual's aggregate exceeds the \$200 threshold, the amount should not be deducted from the Column B figure for Line 11(a)(ii). Please amend your report and any subsequent reports that may be affected by this correction.

-Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$908 in individual Itemized Contributions. The sum of the entries itemized on Schedule A, however, indicates the total to be \$2,408. Please amend your report to clarify the discrepancy.

-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 frequency of the deduction and the aggregate amount of the contribution during the reporting 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,



Jennifer K. Wall
Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

SCHEDULE A		ITEMIZED RECEIPTS		Use spaces provided for date, amount of the checked Quarterly Form		PAGE	OF
						11(a)(1)	
Contributions from Individuals							
Any information covered here such as Report and Disbursements may not be used for any purpose of selecting contributors or for determining expenses, other than using the name and address of any person otherwise to make contributions from such person.							
NAME OF COMMITTEE OR FUND							
National Organization PAC 000000001							
A. Full Name, Mailing Address and ZIP Code		Name of Employer		Date month, day, year		Amount of Cash Received for Period	
Anne Sullivan 21 18th Street City, State ZIP		National Organization, Inc. President		payroll deduction		\$80.00	
Received For: <input type="checkbox"/> Other receipt <input type="checkbox"/> Primary <input type="checkbox"/> General		Branch Manager		aggregate Year-to-Date >		\$250.00 (\$16 biweekly)	
B. Full Name, Mailing Address and ZIP Code		Name of Employer		Date month, day, year		Amount of Cash Received for Period	
Rodney Jones 881 Hambury Road City, State ZIP		National Organization, Inc. Director		payroll deduction		\$180.00	
Received For: <input type="checkbox"/> Other receipt <input type="checkbox"/> Primary <input type="checkbox"/> General		Vice President		aggregate Year-to-Date >		\$560.00 (\$80 biweekly)	

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paycheck during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be complete for each donor. 104.8(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$16 per pay period (each pay period is two weeks) for the company's SSF. SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$80 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), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions 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 a manager's contributions reach \$360. Now the committee itemizes the contributions received from the manager during the third quarter (\$80 providing the year-to-date total appropriate space. (See item illustration above.)

CAMPAIGN GUIDE



**FOR CORPORATIONS
AND LABOR
ORGANIZATIONS**

