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September 26, 1995

Mr. John Gibson
Assistant Staff Director
Reports Analysis Division
Federal Elections Commission
Washington, D.C. 20463

Identification Number: C00075820

Reference: April Monthly Report

Dear Mr. Gibson:

This letter responds to your letter dated April 21, 1995. As you noted in your letter, we transferred the federal share of an in-kind contribution subsequent to the receipt of that contribution. This was an isolated clerical mistake. As you will note from our reports, all subsequent federal transfers in connection with in-kind contributions were made on the day of the contribution in compliance with Advisory Opinion 1922-33, and it is our policy to follow that opinion.

In addition, thank you for pointing out the calculation error made with respect to that transfer. As you can see, while the ratio was 60% federal, 40% non-federal, we mistakenly inverted the allocation ratio with respect to that transfer. We also have checked subsequent transfers and have now made an additional transfer of $3,322.84 to account for this discrepancy. To insure that this does not happen in the future we will double check all transfers to make sure they comply with the appropriate allocation ratio.

If you have any further questions, please contact me at 202-479-7027.

Very truly yours,

Donna M. Singleton

Donna M. Singleton, Treasurer

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