

NEIL N. LAPIDUS  
2501 WATZATA BOULEVARD  
MINNEAPOLIS, MINNESOTA 55405

FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

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June 7, 1995

Mr. Kenneth A. Davis, Jr.  
Federal Election Commission  
Reports Analysis Division  
Washington, D.C. 20463

Identification Number: C00245316

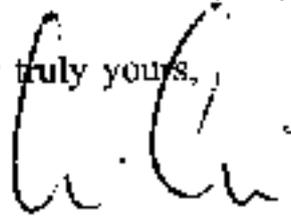
Re: 30 Day Post-General Report (10/1/94 - 11/28/94)

Dear Mr. Davis:

I'm writing in response to your May 31, 1995 letter regarding administrative expenses for MinnPAC. Please be advised that the accounting services and other administrative services are provided by volunteers of MinnPAC. We are a relatively small organization with quite a limited budget. We do not pay rent, utilities, salaries, telephone service or own office equipment or supplies.

Please call me at (612) 377-4404 if you have any further questions.

Very truly yours,



Neil N. Lapidus

NNL:ds

cc: Mr. Frank Berman



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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Frank R. Berman, Treasurer  
Minn PAC  
720 National City Bank  
Minneapolis, MN 55402

MAY 31 1995

Identification Number: C00245316

Reference: 30 Day Post-General Report (10/1/94-11/28/94)

Dear Mr. Berman:

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 no 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 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 non-election year. Please provide the necessary information

*Celebrating the Commission's 20th Anniversary*

YESTERDAY, TODAY AND TOMORROW  
DEDICATED TO KEEPING THE PUBLIC INFORMED

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regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

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,



Kenneth A. Davis, Jr.  
Reports Analyst  
Reports Analysis Division

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