



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

RQ-2

Edward Fitzsimmons, Treasurer
ARA Services Political Action
Committee (ARA PAC)
1101 Market St.
ARA Tower 30th Floor
Philadelphia, PA 19107

MAR 30 1994

Identification Number: C00157677

Reference: Mid-Year Report (1/1/93-6/30/93)

Dear Mr. Fitzsimmons:

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:

-Schedule B of your report discloses a \$3,356.52 payment to your connected organization for catering expenses for Rendell/Yeakel reception (pertinent portion(s) attached). 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund.

Please amend your report to clarify whether the payment to your connected organization was for expenditures which were intended to influence federal elections and provide the dates of the activity conducted by your connected organization. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

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,

Andrew J. Dodson
Senior Reports Analyst
Reports Analysis Division

94038390590

SCHEDULE B

FINANCED DISBURSEMENTS

Use separate schedules for each category of the Detailed Schedule Page

Page 1 of 1
FOR LINE NUMBER 23

Any information received from each donor and recipient may not be used in any manner for the purpose of making contributions or for continuing purposes, except that using the name and amount of any political committee to solicit contributions from such sources.

Name of Committee in Full

ABA Political Action Committee (PAC)

APD

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Description Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
ABA Services/Tower Restaurant 1101 Market St. Philadelphia, PA 19107	Catering Expense Randall/Leibel	1/26/93	3,356.52
Cecilia Hatch 94 Primary c/o Berwin & Co., Suite 1100 60714th St. NW Washington, DC 20005	Contribution	3/4/93	1,500.00
Friends of Jim Norton 430 Chiron House Office Bldg. Washington, DC 20515	Contribution	3/24/93	250.00
1200 Seventeenth St. NW Washington, DC 20036	Contribution	6/6/93	5,000.00
Citizens for Senator McCord 1420 Walnut St., Suite 808 Philadelphia, PA 19102	Contribution	5/19/93	2,000.00
Poglietta for Congress P. O. Box 15052 Washington, DC 20003-0052	Contribution	6/9/93	250.00

SUBTOTAL of Disbursements This Page (amount)

TOTAL This Period (fill page with line number codes)

12,356.52

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