



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

NOV 5 1993

William J. Bartok, Treasurer
Fresh Wellman Good Government Fund
17076 St. Clair Avenue
Cleveland, OH 44110

Identification Number: C00216770

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

Dear Mr. Bartok:

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 A supporting Line 11(a)(i) discloses contributions received through what appears to be a payroll deduction plan. (11 CFR §104.8(b)) In the future, please refer to the enclosed sample of correctly reported payroll deductions (see attached).

-Your report(s) was not signed by the treasurer or designated agent listed on your Statement of Organization. The Commission notes that your committee may in fact have a new treasurer. Please amend your Statement of Organizations (Form 1 enclosed) to provide written notification of the change in treasurer if one has occurred. 2 U.S.C. §434(a)(1) and 11 CFR §104.14(a) and (d)

Any amendment or clarification should be filed with the Federal Election Commission. 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,

Amy Suzanne Reynolds
Reports Analyst
Reports Analysis Division

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PAYROLL DEDUCTIONS

SCHEDULE A ITEMIZED RECEIPTS		Use separate schedule for each category of the Modified Summary Page	PAGE 11 OF 11 FOR LINE 11(A)(2)
Contributions from Individuals			
Any information copied from such Reports and Statements may not be used or used by any person for the purpose of making contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
NAME OF COMMITTEE (or Full) National Organization PAC 00000001			
A. Full Name, Mailing Address and ZIP Code John Sullivan 81 10th Street City, State ZIP	Name of Employer National Organization, Inc. Occupation Branch Manager Applicable Year-to-Date > 1 \$228.00	Date month, day, year payroll deduction	Amount of Each Receipt for Period \$78.00 (\$12 biweekly)
B. Full Name, Mailing Address and ZIP Code Rodney Jones 881 Mainbury Road City, State ZIP	Name of Employer National Organization, Inc. Occupation Vice President Applicable Year-to-Date > 4 \$80.00	Date month, day, year payroll deduction	Amount of Each Receipt for Period \$180.00 (\$60 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 paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay 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 completed for each donor. 104.13(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$12 per pay period (each pay period is two weeks for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's contributions as "unitemized contributions" in its April and July quarterly reports. By June 30, the closing date for the July report, the manager's aggregate contributions are \$195 — still below the \$200 itemization threshold. By September 30 — the closing date for the October quarterly report — the manager's contributions reach \$228. Therefore, the committee itemizes the total contributions received from the manager during the third quarter (\$120), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

IN-KIND CONTRIBUTIONS

SCHEDULE A ITEMIZED RECEIPTS		Use separate schedule for each category of the Modified Summary Page	PAGE 11 OF 11 FOR LINE 11(A)(2)
Contributions from Individuals			
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NAME OF COMMITTEE (or Full) National Organization PAC 00000001			
A. Full Name, Mailing Address and ZIP Code Martin L. Evans 4 River Road City, State ZIP	Name of Employer National Organization, Inc. Occupation Chairman Applicable Year-to-Date > 6 \$3,996.00	Date month, day, year 8/19/92	Amount of Each Receipt for Period \$6,996.00 (IN-KIND) (RAFFLE PRIZES)

In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See Chapter 2 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at right.

SCHEDULE B ITEMIZED EXPENDITURES		Use separate schedule for each category of the Modified Summary Page	PAGE 21 OF 21 FOR LINE 21(B)
Operating Expenditures/Other Federal			
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NAME OF COMMITTEE (or Full) National Organization PAC 00000001			
A. Full Name, Mailing Address and ZIP Code Martin L. Evans 4 River Road City, State ZIP	Purpose of Expenditure raffle prizes Contributions on: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other activity	Date month, day, year 8/19/92 (IN-KIND)	Amount of Each Expenditure for Period (\$3,996.00 CONTRIBUTION)

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

Appreciated Goods

When a committee receives an in-kind contribution whose value may

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