



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

REC-5

Cynthia Suzuki, Treasurer  
Foundation Health Corporation PAC  
3400 Data Drive  
Sancho Cordova, CA 95670

NOV 5 1993

Identification Number: C00230789

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

Dear Ms. Suzuki:

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)(1) discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the total amount of contributions deducted from each individual's paycheck during the reporting period and note the amount deducted per pay period in the "Amount of Each Receipt this Period" column. (11 CFR §104.8(b)) Please refer to the enclosed sample of correctly reported payroll deductions (see attached).

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

## PAYROLL DEDUCTIONS

SCHEDULE A ITEMIZED RECEIPTS		Use amounts itemized in each category of the Detailed Summary Page		PAGE OF
Contributions from Individuals				FOR LINE NUMBER
Any information copied from your Reports and Statements may not be sold 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.				\$10,000
<b>NAME OF CONTRIBUTOR OR PAC</b> <b>National Organization PAC</b>				
A. Full Name, Mailing Address and ZIP Code  Anne Sullivan 121 15th Street City, State ZIP  Person For: <input type="checkbox"/> Primary <input type="checkbox"/> Other <input type="checkbox"/> Donor <input type="checkbox"/> Other entity		<b>Name of Employer</b> <b>National Organization, Inc.</b>  <b>Position</b> <b>Payroll Manager</b> <b>Amount Year-to-Date &gt; 1</b> \$200.00	<b>Date (Year, Mo., Day)</b> <b>payroll deduction</b>	<b>Amount of Each Payroll Deduction</b> <b>\$100.00</b> <b>(\$100 biweekly)</b>
B. Full Name, Mailing Address and ZIP Code  Rodney Jones 451 Harkbury Road City, State ZIP  Person For: <input type="checkbox"/> Primary <input type="checkbox"/> Other <input type="checkbox"/> Donor <input type="checkbox"/> Other entity		<b>Name of Employer</b> <b>National Organization, Inc.</b>  <b>Position</b> <b>Vice President</b> <b>Amount Year-to-Date &gt; 1</b> \$800.00	<b>Date (Year, Mo., Day)</b> <b>payroll deduction</b>	<b>Amount of Each Payroll Deduction</b> <b>\$160.00</b> <b>(\$80 biweekly)</b>

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

## IN-KIND CONTRIBUTIONS

SCHEDULE A ITEMIZED RECEIPTS		Use amounts itemized in each category of the Detailed Summary Page		PAGE OF
Contributions from Individuals				FOR LINE NUMBER
Any information copied from your Reports and Statements may not be sold 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.				\$10,000
<b>NAME OF CONTRIBUTOR OR PAC</b> <b>National Organization PAC</b>				
A. Full Name, Mailing Address and ZIP Code  Martin L. Kress 4 River Road City, State ZIP  Person For: <input type="checkbox"/> Primary <input type="checkbox"/> Other <input type="checkbox"/> Donor <input type="checkbox"/> Other entity		<b>Name of Employer</b> <b>National Organization, Inc.</b>  <b>Position</b> <b>Chairman</b> <b>Amount Year-to-Date &gt; 1</b> \$5,000.00	<b>Date (Year, Mo., Day)</b> <b>5/19/92</b>	<b>Amount of Each Payroll Deduction</b> <b>\$3,000.00</b> <b>(\$1,000) CHURCH FUND</b>

SCHEDULE B ITEMIZED EXPENDITURES		Use amounts itemized in each category of the Detailed Summary Page		PAGE OF
Operating Expenditures/Other Federal				FOR LINE NUMBER
Any information copied from your Reports and Statements may not be sold 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.				\$10,000
<b>NAME OF CONTRIBUTOR OR PAC</b> <b>National Organization PAC</b>				
A. Full Name, Mailing Address and ZIP Code  Martin L. Kress 4 River Road City, State ZIP  Person For: <input type="checkbox"/> Primary <input type="checkbox"/> Other <input type="checkbox"/> Donor <input type="checkbox"/> Other entity		<b>Purpose of Disbursement</b> <b>Office rental</b> <b>Amount Year-to-Date &gt; 1</b> \$5,000.00	<b>Date (Year, Mo., Day)</b> <b>5/19/92</b>	<b>Amount of Each Disbursement</b> <b>\$3,000.00</b> <b>(CHURCH FUND)</b>

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

## 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. 104.8(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 \$226. 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

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.

### Appreciated Goods

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

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