



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

July 10, 1997

Tim Donmoyer, Treasurer
Eller Media Company Political
Action Committee
2850 East Camelback Road, Suite #300
Phoenix, AZ 85016

Identification Number: C00279216

Reference: 12 Day Pre-General (10/1/96-10/16/96), 30 Day Post-General (10/17/96-11/25/96) and Year End (11/26/96-12/31/96) Reports

Dear Mr. Donmoyer:

This letter is to inform you that as of July 9, 1997, the Commission has not received your response to our requests for additional information dated June 18, 1997. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Neil Evans on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

A handwritten signature in cursive script, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures



FEDERAL ELECTION COMMISSION
WASHINGTON, D. C. 20463

RQ-2

JUN 18 1997

Tim Donmoyer, Treasurer
Eller Media Company Political
Action Committee
2850 East Camelback Road, Suite #300
Phoenix, AZ 85016

Identification Number: C00279216

Reference: 30 Day Post-General Report (10/17/96-11/25/96)

Dear Mr. Donmoyer:

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 calculations for Lines 6(d) and 8, Column A appear to be incorrect. Please provide the corrected totals on the Summary Page.
- Please provide the total(s) for Line 30, Columns A and B of the Detailed Summary Page. Note that changes in your figures may affect your Column B totals on this report and/or on subsequent reports.
- Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$1,790.44 in itemized individual contributions. The sum of the entries itemized on Schedule A, however, indicates the total to be \$1,252.97. Please amend your report to clarify the discrepancy.
- Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the amount deducted per pay period and the frequency of deduction. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

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,

A handwritten signature in black ink, appearing to read "Neil Evans". The signature is fluid and cursive, with a large initial "N" and a long, sweeping underline.

Neil Evans
Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

SCHEDULE A **ITEMIZED RECEIPTS**

Contributions from Individuals

Use address information for 1997 recipient in the Detailed Summary Page

PAGE OF FOR LINE NUMBER 11(a)(1)

Any information shown from such Reports and Statements may not be used by any person for the purpose of evading contributions or for determining purposes other than using the name and address of any political committee to solicit contributions from such individuals

NAME OF COMMITTEE (in Full): National Organization PAC 00000001

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date Rec'd (M, YR)	Amount of Each Receipt (Per Period)
Anna Sullivan 21 18th Street City, State ZIP	National Organization, Inc. Branch Manager	Payroll deduction	\$78.00 (812 [weekly])
Rodney Jones 881 Hastybury Road City, State ZIP	National Organization, Inc. Vice President	Payroll deduction	\$120.00 (820 [weekly])
Aggregate Total to Date > \$			\$228.00

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, 104.8(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 \$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**

Contributions from Individuals

Use address information for 1997 recipient in the Detailed Summary Page

PAGE OF FOR LINE NUMBER 11(a)(1)

Any information shown from such Reports and Statements may not be used by any person for the purpose of evading contributions or for determining purposes other than using the name and address of any political committee to solicit contributions from such individuals

NAME OF COMMITTEE (in Full): National Organization PAC 00000001

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date Rec'd (M, YR)	Amount of Each Receipt (Per Period)
Martin L. Kress 4 River Road City, State ZIP	National Organization, Inc. Chairman	8/19/92	\$3,999.00 (IN-KIND) (RAFFLE PRIZE)
Aggregate Total to Date > \$			3,999.00

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

SCHEDULE B **ITEMIZED DISBURSEMENTS**

Operating Expenditures/Other Federal

Use address information for 1997 recipient in the Detailed Summary Page

PAGE OF FOR LINE NUMBER 21(b)

Any information shown from such Reports and Statements may not be used by any person for the purpose of evading contributions or for determining purposes other than using the name and address of any political committee to solicit contributions from such individuals

NAME OF COMMITTEE (in Full): National Organization PAC 00000001

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date Rec'd (M, YR)	Amount of Each Disbursement (Per Month)
Martin L. Kress 4 River Road City, State ZIP	raffle prize	8/19/92	\$3,999.00 (IN-KIND CONTRIBUTION)

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