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FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

September 22, 2010

Jessica C. Graham, Treasurer Afognak Native Corporation-Alutiiq PAC 3909 Arctic Blvd, Suite 400 Anchorage, AK 99503 Response Due Date: October 27, 2010

Identification Number: C00443937

Reference: April Quarterly Report (1/1/10-3/31/10)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following  $\underline{2}$  items:

1. Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$6,555.00 in individual contributions. The sum of the entries itemized on Schedule A, however, indicates the total to be \$965.00. Please amend your report to clarify the discrepancy.

2. 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 total amount deducted for the entire reporting period for each individual. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered. <u>Electronic filers must file amendments (to include statements, designations and</u> reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1140.

Sincerely, James McAllister

Campaign Finance Analyst Reports Analysis Division

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SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS	Use separate achedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: PAGE OF   (check only one) 110 110 112   113 114 115 16 17
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<sup>\*\*</sup>אלאריך איניאס דרךדיים אונייט ליישוע איניאס אינישוע אינישע אינישע אינישע אינישע אינישע אינישע אינישע אינישע דואר ז'ר פיילפגרניבעניסט אינישע אינ דואר ז'ר פיילפגרניבעניסט אינישע אינ

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See the illustration above.)

## **In-Kind Contributions**

When determining whether to itemIze an *in-kind* contribution received, follow the same guidelines listed above under "When to ItemIze Receipts." See page 9 for information on how to determine the dollar value of an *in-kind* contribution.

In addition, add the value of the *in-kind contribu*tion to the operating expenditures total on Line 2!(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 on page 56.

## **Appreciated Goods**

When a committee receives an *in-kind contribution* whose value may appreciate over time, such as stock or artwork, special reporting rules apply:

- Itemize the initial gift, if necessary, as a memo entry on Schedule A (see "When to Itemize Receipts," on page 53). Under "Amount," report the fair market value of the contribution on the date the item was received. Do not include that amount in the total for Line II(a)(i) on the Datailed Summary Page.
- Once the item is sold, report the sale price as a *contribution* on Line 11(a)(i) if the purchaser is known or as an "other *receipt*" on Line 15 if the purchaser is unknown.

Itemize the transaction on Schedule A if necessary. 104.13(b). See also AO 1989-6.

## **Joint Contributions**

A joint contribution is made by a single check that bears two signatures. A check with one signature may also be a joint contribution if an accompanying form or letter, signed by both contributors, instructs the committee to treat it as a joint contribution. (A check drawn on a joint bank account but signed by only one person does not qualify as a joint contribution. Attribute the full amount of such a check only to the person who signed it. Alternatively, a reattribution may be sought using the procedures described bclow.)

For the purposes of itemization, report a joint contribution as though the joint contributors had given separately.

A joint contribution is itemized in items A and B in the illustration on page 57. In this case, the committee received a \$1,000 check from a married couple, signed by both spouses. Because there were no

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