FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

September 29, 1994

Mark R. Elam, Treasurer
Victory America (FKA) Fund for
Southern Progress
P.O. Box 11771
Columbia, SC 29211

Identification Number: C00216077

Reference: July Quarterly Report (4/1/94-7/1/94)

Dear Mr. Elam:

This letter is to inform you that as of September 28, 1994, the Commission has not received your response to our request for additional information, dated September 7, 1994. This notice requests 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 this request (copy 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 Ken Davis on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Mark R. Elam, Treasurer
Victory America (FKA) Fund for
Southern Progress
P.O. Box 11771
Columbia, SC 29211

SEP - 7 1994

Identification Number: C00216077

Reference: July Quarterly Report (4/1/94-7/1/94)

Dear Mr. Elam:

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 report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of $200 in a calendar year must be disclosed on Schedule B, supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is $500 or more, or outstanding for sixty days or more. 11 CFR §104.11

[illegible] goods or services provided to your committee by a [illegible] except volunteer activity (i.e., a person's [illegible] would be considered an in-kind contribution from [illegible] person," and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed <u>during each two year election cycle</u> beginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your

committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

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,

Kenneth Davis, Jr.

Kenneth A. Davis, Jr.
Reports Analyst
Reports Analysis Division

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