



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

APR 22 1998

Bridget A. Filippon, Treasurer
Chase Manhattan Corporation
Fund For Good Government
270 Park Avenue, 44th Floor
New York, NY 10017

Identification Number: C00003830

Reference: March Monthly Report (2/1/98-2/28/98)

Dear Ms. Filippon:

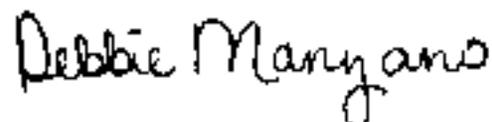
This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses in-kind contributions made on behalf of federal candidates. In addition, the attribution to each federal candidate has been noted as a memo entry on Schedule B for Line 23. Your memo entry regarding this activity states that "As of 10/10/95, there remained in escrow of the Chase Manhattan Bank a credit amount of \$3,622.85 to be used for future in-kind contributions." Please clarify when these funds were transferred into escrow and whether this activity was disclosed in the appropriate reporting period(s).

It is recommended that the amount of such activity be subtracted from the Line number that the transfer to escrow was originally reported on and added to Line 23 of the Detailed Summary Page. This method of reporting would clarify for the public record the total amount of contributions to federal candidates (including in-kind contributions) by reflecting them on Line 23 of the Detailed Summary Page. In addition, the name and address of the payee for this activity should be disclosed as Chase Manhattan Bank, and not as the candidate's committee name.

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) 694-1130.

Sincerely,

A handwritten signature in cursive script that reads "Debbie Manzano".

Debbie Manzano
Senior Reports Analyst
Reports Analysis Division

Line 16. Refunds of Contributions

Itemize refunds of contributions made by the SSF on a Schedule A regardless of their amount. See Section 5 for more information on how to report them. Enter the total on Line 16.

Line 17. Other Receipts

This category includes interest and dividends earned on investments. Itemize these receipts on a Schedule A once the committee receives more than \$200 from the same source during a calendar year. Enter the total under this category on Line 17. See Section 6 for more information on interest and dividends.

Line 18. Transfers from Nonfederal Account for Joint Activity

If the committee maintains a non-federal account for state and local election activities and pays its own administrative expenses, the federal account (the SSF) may accept a transfer of funds from the nonfederal account for the sole purpose of covering its share of a joint federal and nonfederal expense. 105.6(e)(1)(i). Report the total amount transferred from the nonfederal account during the period (i.e., the total from Schedule H3) on Line 18.

Other rules concerning these transfers are explained in Appendix A.

4. Itemized Disbursements: Schedule B

When to Itemize Disbursements

Regardless of Amount
Several types of disbursements must be itemized regardless of amount:

- Transfers to affiliated SSFs;
- Contributions to candidates and political committees;
- Loan repayments; and
- Loans made by the SSF.

Note that refunds of contributions (Line 26 on the Detailed Summary Page) must be itemized on Schedule B only if the incoming contribution had to be itemized on Schedule A, as explained earlier in this chapter.

CONTRIBUTIONS TO CANDIDATES

SCHEDULE B		ITEMIZED DISBURSEMENTS	
Contributions to Federal Candidates		Use amount entered on each category of the Detailed Summary Page	PAGE OF FOR LINE NUMBER
<small>Any information copied from each Receipt and Statement may not be sold or used by any person for the purpose of soliciting contributions or for any other purpose, other than using the name and address of any political committee to solicit contributions from such committee.</small>			
NAME OF COMMITTEE (or Party) National Organization PAC 00000000			
A. Full Name, Mailing Address and ZIP Code Holiday Plaza Hotel 1100 Burlington Avenue City, State ZIP	Purpose of Disbursement reception for Bill Jones, House candidate, 8th (State) 7/15/94	Date Made See page 8	Amount of Each Disbursement This Period \$679.70 (in-kind)
Disbursement for: <input type="checkbox"/> Party <input checked="" type="checkbox"/> General (Other option)			

See page 8 for information on how to determine the value of an in-kind contribution.

B. Full Name, Mailing Address and ZIP Code Citizens for Stan Smythe 5470 Rushmore Street City, State ZIP	Purpose of Disbursement Stan Smythe, House candidate, 11th (State) 7/13/94	Date Made See page 8	Amount of Each Disbursement This Period \$150.00
Disbursement for: <input type="checkbox"/> Party <input checked="" type="checkbox"/> General (Other option)			

Itemize contributions to federal candidates regardless of amount.

C. Full Name, Mailing Address and ZIP Code Taylor for Congress 11 Main Street City, State ZIP	Purpose of Disbursement Mavis Taylor, House candidate, 2nd (State) 8/1/94	Date Made See page 8	Amount of Each Disbursement This Period \$800.00
Disbursement for: <input type="checkbox"/> Party <input checked="" type="checkbox"/> General (Other option)			

See page 11 for information on making post-election contributions to retire a candidate's debts.

Other Disbursements: \$200 Threshold
A disbursement that does not fall under one of the categories listed above (such as a donation to a nonfederal candidate) must be itemized if it exceeds \$200 when aggregated with other disbursements made to the same payee during the calendar year.

How to Itemize Disbursements

Categorizing Disbursements
Before beginning to itemize the committee's disbursements, separate them into the different categories listed on the Detailed Summary Page ("Operating Expenditures," "Contributions to Federal Candidates," etc.; an illustration of a completed Detailed Summary Page appears on page 37). The disbursements in each category must be itemized on a separate Schedule B designated for that category.

Indicate the type of disbursement itemized on a particular Schedule B by entering the corresponding line number from the Detailed Summary Page in the upper right corner of the schedule. The appropriate category of disbursement may also be written at the top of each page.

Some categories may require several pages. The total for each category should be entered on the bottom line of the last page for that category.

Itemized Information

Itemized disbursement information includes:

- Name of payee;
 - Address of payee;
 - Purpose of disbursement (a brief but specific description of why the disbursement was made—see Schedule B instructions and 104.3(b)(3)(i)(B));
 - Date of payment; and
 - Amount.
- 104.3(b)(3); 104.9.

Additional Information on Candidates

Further information is required when itemizing a contribution to a candidate committee on Schedule B. Include the candidate's name and the office sought (including the state and, if applicable, Congressional district). When itemizing a contribution or loan to a candidate committee, specify the election for which the payment was made by checking the appropriate category in the election designation box. 104.3(b)(3)(v). See illustrations above.

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