



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

RQ-2

NOV 1 1995

Douglas B. Kidd, Treasurer
Bankers Trust New York Corporation
Political Action Committee
280 Park Avenue
New York, NY 10017

Identification Number: C00097089

Reference: Mid-Year Report (1/1/95-6/30/95)

Dear Mr. Kidd:

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 B of your report discloses a contribution(s) to Representative Jack Fields for the retirement of debts incurred by the 1994 general election campaign; however, it appears that the recipient committee(s) had insufficient debts to warrant such a contribution. Please note that a committee may only designate contributions to retire a candidate's debts if those debts exist.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should either notify the recipient and request a refund of the impermissible amount and/or notify the recipient, in writing, of your redesignation of the contribution. All refunds and redesignations must be made within sixty days of the treasurer's receipt of the contribution. Refunds are reported on Line 16 of the Detailed Summary Page and on Schedule A of the report covering the period during which they are received. Redesignations are reported as memo entries on Schedule B of the report covering the period during which the redesignation is made. 11 CFR §110.2(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Line 23 of the Detailed Summary Page of your report discloses a total of \$0 in contributions to federal candidates. The sum of the entries itemized on Schedule

B, however, indicates the total to be \$14,000. Please amend your report to clarify the discrepancy.

-On Schedule A supporting Line 11(a)(i) of the Detailed Summary Page, your report disclosed contributions from individuals that omit the aggregate year-to-date totals. Please amend your report by supplying the information. 11 CFR §104.3(a)(4)(i)

-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 of money deducted per pay period. 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,



Vincent R. Tallman
Reports Analyst
Reports Analysis Division

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PAYROLL DEDUCTIONS

SCHEDULE A ITEMIZED RECEIPTS		Use separate schedules for each category in the District Survey Form	PAGE	OF
Contributions from Individuals			FOR LINE NUMBER	11(a)(1)
All information shown here on Receipts and Statements may be used to verify the accuracy of reporting contributions on tax returns. Please refer to the instructions on the back of this form for more information on the correct use of this form.				
NAME OF COMMITTEE IN FULL National Organization PAC 00000001				
A. Full Name, Mailing Address and ZIP Code		Name of Employer	Date receipt was made	Amount of Cash Received This Period
Anne Sullivan 21 16th Street City, State ZIP		National Organization, Inc.	payroll deductions	\$78.00
Name of Donor		Occupation	Applicable Pay-to-Date	Amount of Cash Received This Period
Anne Sullivan		Branch Manager	\$228.00	(\$12 biweekly)
B. Full Name, Mailing Address and ZIP Code		Name of Employer	Date receipt was made	Amount of Cash Received This Period
Rodney Jones 881 Hamabury Road City, State ZIP		National Organization, Inc.	payroll deductions	\$120.00
Name of Donor		Occupation	Applicable Pay-to-Date	Amount of Cash Received This Period
Rodney Jones		Vice President	\$380.00	(\$20 biweekly)

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 "EC 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 \$196 — 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		Use separate schedules for each category in the District Survey Form	PAGE	OF
Contributions from Individuals			FOR LINE NUMBER	11(a)(1)
All information shown here on Receipts and Statements may be used to verify the accuracy of reporting contributions on tax returns. Please refer to the instructions on the back of this form for more information on the correct use of this form.				
NAME OF COMMITTEE IN FULL National Organization PAC 00000001				
A. Full Name, Mailing Address and ZIP Code		Name of Employer	Date receipt was made	Amount of Cash Received This Period
Martin L. Evans 4 River Road City, State ZIP		National Organization, Inc.	8/18/82	\$5,898.00
Name of Donor		Occupation	Applicable Pay-to-Date	Amount of Cash Received This Period
Martin L. Evans		Chairman	\$5,898.00	(IN-KIND) (RAFFLE PRIZE)

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 DEDUCTIONS		Use separate schedules for each category in the District Survey Form	PAGE	OF
Operating Expenditures/Other Payments			FOR LINE NUMBER	21(b)
All information shown here on Receipts and Statements may be used to verify the accuracy of reporting contributions on tax returns. Please refer to the instructions on the back of this form for more information on the correct use of this form.				
NAME OF COMMITTEE IN FULL National Organization PAC 00000001				
A. Full Name, Mailing Address and ZIP Code		Name of Donor	Date receipt was made	Amount of Cash Received This Period
Martin L. Evans 4 River Road City, State ZIP		RAFFLE PRIZE	8/18/82	\$5,898.00
Name of Donor		Occupation	Applicable Pay-to-Date	Amount of Cash Received This Period
Martin L. Evans		Chairman	\$5,898.00	(IN-KIND CONTRIBUTION)

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

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