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April 15, 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Anthony J. Dodson
Senior Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: February Monthly Report (2/1/93-2/28/93) -
Identification Number: C00177972

Dear Mr. Dodson:

This is in response to your letter dated April 6, 1994, concerning disclosure of the administrative expenses of the Pillsbury, Madison and Sutro Political Action Committee (identification number C00177972) [the "PAC"]. (See enclosed copy.)

The PAC is a small nonconnected committee. As we discussed, all services rendered to the PAC in connection with compliance with the Federal Election Campaign Act of 1971, as amended, are disclosed as a "Memo Entry" on the monthly reports filed by the PAC. (See 11 C.F.R. § 100.7 (b)(13), 104.3(h)). In addition, all miscellaneous expenditures (such as mailing and photocopying) are disclosed as "Other Federal Operating Expenditures." (11 C.F.R. § 104.3(b)(3)(i)).

Finally, we note that the PAC does not engage in federal and nonfederal activity, which we understand could trigger special disclosure of administrative expenses under 11 C.F.R. § 106.6.

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE DIVISION
APR 19 4 33 PM '94

Mr. Anthony J. Dodson
April 15, 1994
Page 2

If I may of any further assistance to you on this matter,
please do not hesitate to contact me.

Very truly yours,



Teresa Craigie Lahaderne

Enc.

cc: Mr. F. K. Lowell

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Frederick K. Lowell, Treasurer
Pillsbury Madison & Sutro
Political Action Committee
225 Bush Street, P.O. Box 7880
San Francisco, CA 94120

APR 6 1994

Identification Number: C00177972

Reference: March Monthly Report (2/1/93-2/28/93)

Dear Mr. Lowell:

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 no 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

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that 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 during each two year election cycle beginning with the first report filed in the non-election year. Please provide the necessary information

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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) 424-9580. My local number is (202) 219-3580.

Sincerely,



Andrew J. Dodson
Senior Reports Analyst
Reports Analysis Division

94038944783

Federal Election Commission
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PREPARER

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