



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

MAR 15 1995

Thomas Studevant, Treasurer
Dayton Power and Light Company
Employees' Fund for
Responsible Citizenship
P.O. Box 8825
Dayton, OH 45401

Identification Number: C00102947

Reference: October Quarterly Report (7/1/94-9/30/94)

Dear Mr. Studevant:

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 earmarked contributions. If the contribution passed through your committee's account, each must be itemized on the Schedule A regardless of the amount. For disclosure purposes, the name and mailing address for each contributor must be provided, and where the contribution exceeds \$200, the individual's occupation and name of employer must also be itemized. Please amend your report accordingly. 11 CFR §110.6(c)(1)(v)

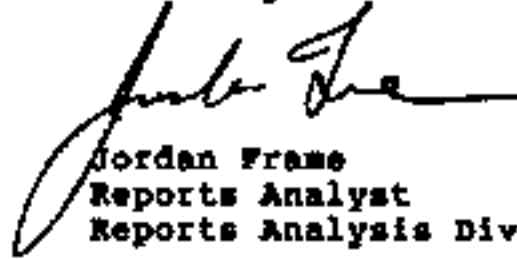
-Schedule A supporting Line 11(a)(i) discloses contributions received through a payroll deduction plan. Generally, a committee's report must identify each contribution from an individual which in the aggregate exceeds \$200 during the calendar year. (2 U.S.C. §434(b)) In lieu of separate itemization, a committee using a payroll deduction plan may disclose the aggregate amount of contributions received from the contributor through the payroll deduction plan during the reporting period; the identification of the individual where the contribution exceeds \$200 in the aggregate during the calendar year; and a statement of the amount deducted per pay period. 11 CFR §104.8(b)

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

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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,



Jordan Frame
Reports Analyst
Reports Analysis Division

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PAYROLL DEDUCTIONS

SCHEDULE A ITEMIZED RECEIPTS		PAGE OF	
Contributions from Individuals		FOR LINE NUMBER 11(A)(1)	
<small>Any information reported from your Records and Statements may not be used or used in any manner for the purpose of determining contributions or for administrative purposes, other than using the name and address of any person appearing to obtain contributions from such sources.</small>			
NAME OF COMMITTEE OR FUND National Organization PAC 00000001			
A. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month day year)
Anne Sullivan 51 18th Street City, State ZIP		National Organization, Inc.	payroll deduction
<small>Amount of Cash Received (see Form)</small> \$72.00		<small>Occupation</small> Branch Manager	<small>Amount of Cash Received (see Form)</small> (\$12 biweekly)
B. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month day year)
Rodney Jones 551 Hambury Road City, State ZIP		National Organization, Inc.	payroll deduction
<small>Amount of Cash Received (see Form)</small> \$120.00		<small>Occupation</small> Vice President	<small>Amount of Cash Received (see Form)</small> (\$60 biweekly)

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

IN-KIND CONTRIBUTIONS

SCHEDULE A ITEMIZED RECEIPTS		PAGE OF	
Contributions from Individuals		FOR LINE NUMBER 11(A)(1)	
<small>Any information reported from your Records and Statements may not be used or used in any manner for the purpose of determining contributions or for administrative purposes, other than using the name and address of any person appearing to obtain contributions from such sources.</small>			
NAME OF COMMITTEE OR FUND National Organization PAC 00000001			
A. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month day year)
Martin L. Kress 4 River Road City, State ZIP		National Organization, Inc.	8/16/98
<small>Amount of Cash Received (see Form)</small> \$3,998.00		<small>Occupation</small> Chairman	<small>Amount of Cash Received (see Form)</small> (\$120 weekly)

SCHEDULE B ITEMIZED DEDUCTIONS		PAGE OF	
Operating Expenditures/Other Federal		FOR LINE NUMBER 11(B)	
<small>Any information reported from your Records and Statements may not be used or used in any manner for the purpose of determining contributions or for administrative purposes, other than using the name and address of any person appearing to obtain contributions from such sources.</small>			
NAME OF COMMITTEE OR FUND National Organization PAC 00000001			
A. Full Name, Mailing Address and ZIP Code		Name of Beneficiary	Date (month day year)
Martin L. Kress 4 River Road City, State ZIP		raffle prize	8/16/98
<small>Amount of Cash Received (see Form)</small> \$3,998.00		<small>Occupation</small> Chairman	<small>Amount of Cash Received (see Form)</small> (\$120 weekly)

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

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 52F. The 52F, which files FEC 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 \$195 — 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

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

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