

NACPAC

NATIONAL
ACTION
COMMITTEE

201 South Biscayne Boulevard * Suite 880 * Miami, Florida 33131
Telephone: (305) 368-9207 * FAX: (305) 368-1618

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FEDERAL ELECTION
COMMISSION MAIL ROOM

October 27, 1997

Andrea Wilkens, Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

Dear Ms. Wilkens:

Reference your letter dated October 22, 1997, copy attached, concerning the 1997 Mid-Year Report filed by NACPAC.

Please be advised that nearly all administrative expenses are paid by the law firm of Mark R. Vogel, P.A. Administrative expenses include rent, secretarial, telephone, postage, office supplies and xeroxing. Mark R. Vogel, P.A. is reimbursed monthly for these expenses.

Please note the 1997 Mid-Year Report on Schedule B for line number 21.b. reimbursements to Mark R. Vogel, P.A. are as follows:

<u>Date</u>	<u>Amount</u>
01/03/97	\$ 750
02/04/97	750
02/21/97	750
03/05/97	750
04/02/97	1,000
05/06/97	750
06/11/97	750

Finally, please note that NACPAC is not associated or affiliated with any connected organization. In addition, NACPAC does not have a non-federal account. Also, there are no goods or services provided to NACPAC which would be considered in-kind contributions other than volunteer time by NACPAC's officers.

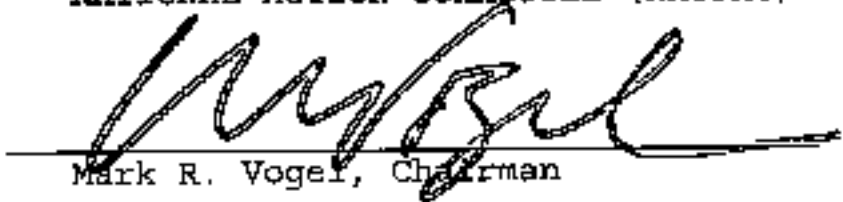
Andrea Wilkens, Reports Analyst
October 27, 1997
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Thank you for the opportunity to respond to your letter. Please do not hesitate to contact us if you have any further questions or require any further information. Thank you for your consideration.

Very truly yours,

NATIONAL ACTION COMMITTEE (NACPAC)

By: _____


Mark R. Vogel, Chairman

MRV/gg
Encls.
Cert. RRR (P-455-173-049)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

OCT 22 1997

Judy Ellenbogen, Treasurer
National Action Committee-NACPAC
701 Brickell Avenue, Suite 3260
Miami, FL 33131

Identification Number: C00147983

Reference: Mid-Year Report (1/1/97-6/30/97)

Dear Ms. Ellenbogen:

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

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 verify that all expenses referenced above (i.e.,

rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

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,

Andrea Wilkens

Andrea Wilkens
Reports Analyst
Reports Analysis Division

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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 E.J. PREPARER	 10/31/97 DATE PREPARED