



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

RQ-2

Dr. Sarkis J. Kechejian, Treasurer
Armenian American PAC (ARMENPAC)
421 E. Airport Freeway
Irving, TX 75206

NOV 27 2002

Identification Number: C00352054

Reference: October Quarterly Report (7/1/02-9/30/02)

Dear Dr. Kechejian:

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(s) 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

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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.

-Schedule B of your report (pertinent portion(s) attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a non-multicandidate political committee and its affiliates, from making a contribution to a candidate for federal office in excess of \$1,000 per election. Please refer to the Campaign Guide for information on how a committee qualifies for multicandidate status.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

If your committee has met the criteria for multicandidate status, please file FEC FORM 1M "Notification of Multicandidate Status" with the Commission. The treasurer must file FEC FORM 1M prior to making a contribution of more than \$1,000 per candidate per election. 11 CFR §102.2(a)(3)

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(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.

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-Schedule A of your report discloses an aggregate year-to-date total(s) for a contribution(s) received from Jim Horn which appears to be incorrect. Please amend your report to provide the correct aggregate year-to-date total(s).

-Please amend Schedule B supporting Line 23 by providing the state and congressional district, if applicable, for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

A response or 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. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Jim Krebs
Campaign Finance Analyst
Reports Analysis Division

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

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21b 22 23 24 25
 26 27 28a 28b 28c 29

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NAME OF COMMITTEE (in Full)
ARMENIAN AMERICAN PAC (ARMENPAC)

Full Name (Last, First, Middle Initial)

Date of Disbursement

09 / 20 / 2002

A. FEINSTEIN DIANNE

Mailing Address

30 PRESIDIO TERRACE

City State Zip Code
SAN FRANCISCO CA 94118

Amount of Each Disbursement this Period

500.00

Purpose of Disbursement
Senate Candidate Contribution

Candidate Name

Category/
Type

Office Sought: House Senate President
Disbursement For: 2002 Primary X General Other (specify) ▼

State: District:

Transaction ID: SB23.4549

Full Name (Last, First, Middle Initial)

Date of Disbursement

08 / 22 / 2002

B. HOYER FOR CONGRESS

Mailing Address

7805 MALCOLM ROAD SUITE 102

City State Zip Code
CLINTON MD 20735

Amount of Each Disbursement this Period

1000.00

Purpose of Disbursement
House Candidate Contribution

Candidate Name

Category/
Type

Office Sought: X House Senate President
Disbursement For: 2002 X Primary General Other (specify) ▼

State: MD District: 08

Transaction ID: SB23.4552

Full Name (Last, First, Middle Initial)

Date of Disbursement

09 / 20 / 2002

C. HOYER STENY HAMILTON

Mailing Address

40740 PARLETT MORGAN ROAD

City State Zip Code
MECHANICSVILLE MD 20659

Amount of Each Disbursement this Period

1000.00

Purpose of Disbursement
House Candidate Contribution

Candidate Name

Category/
Type

Office Sought: House Senate President
Disbursement For: 2002 Primary X General Other (specify) ▼

State: District:

Transaction ID: SB23.4551

SUBTOTAL of Disbursements This Page (optional) ▶

2500.00

TOTAL This Period (last page due line number only) ▶

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)								PAGE 8 / 10	
	<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c

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NAME OF COMMITTEE (In Full)
ARMENIAN AMERICAN PAC (ARMENPAC)

A. FRIENDS OF HILLARY

Full Name (Last, First, Middle Initial) _____

Mailing Address
1780 M ST NW SUITE 413

City: WASHINGTON State: DC Zip Code: 20036

Purpose of Disbursement: House Candidate Contribution

Candidate Name _____ Category/Type _____

Office Sought: House Senate President Disbursement For: 2002 Primary General Other (specify) _____

State: _____ District: _____

Date of Disbursement: 08 / 29 / 2001

Amount of Each Disbursement this Period: 250.00

Transaction ID: SB23.4340

B. GEPHARDT IN CONGRESS COMMITTEE

Full Name (Last, First, Middle Initial) _____

Mailing Address
7435 WATSON ROAD SUITE 107

City: ST LOUIS State: MO Zip Code: 63119

Purpose of Disbursement: House Candidate Contribution

Candidate Name _____ Category/Type _____

Office Sought: House Senate President Disbursement For: 2002 Primary General Other (specify) _____

State: _____ District: _____

Date of Disbursement: 11 / 16 / 2001

Amount of Each Disbursement this Period: 1000.00

Transaction ID: SB23.4342

C. HOYER FOR CONGRESS

Full Name (Last, First, Middle Initial) _____

Mailing Address
7905 MALCOLM ROAD SUITE 102

City: CLINTON State: MD Zip Code: 20735

Purpose of Disbursement: House Candidate Contribution

Candidate Name _____ Category/Type _____

Office Sought: House Senate President Disbursement For: 2002 Primary General Other (specify) _____

State: MD District: 06

Date of Disbursement: 09 / 06 / 2001

Amount of Each Disbursement this Period: 500.00

Transaction ID: SB23.4343

SUBTOTAL of Disbursements This Page (optional) **1750.00**

TOTAL This Period (last page this line number only) **1750.00**

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)

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<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25
<input type="checkbox"/> 28	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 29

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NAME OF COMMITTEE (In Full)
ARMENIAN AMERICAN PAC (ARMENPAC)

Full Name (Last, First, Middle Initial) A. ENGEL ELIOT L.		Date of Disbursement 08 / 22 / 2002
Mailing Address 4901 HENRY HUDSON PKWY		Amount of Each Disbursement this Period 300.00
City BRONX	State NY	
Purpose of Disbursement House Candidate Contribution		Transaction ID: SB23.4544
Candidate Name		
Office Sought: House Senate President	Disbursement For: 2002 Primary X General Other (specify) ▼	
State: District		

Full Name (Last, First, Middle Initial) B. ENGEL ELIOT L.		Date of Disbursement 08 / 19 / 2002
Mailing Address 4901 HENRY HUDSON PKWY		Amount of Each Disbursement this Period 500.00
City BRONX	State NY	
Purpose of Disbursement House Candidate Contribution		Transaction ID: SB23.4545
Candidate Name		
Office Sought: House Senate President	Disbursement For: 2002 Primary X General Other (specify) ▼	
State: District		

Full Name (Last, First, Middle Initial) C. FEINGOLD SENATE COMMITTEE		Date of Disbursement 09 / 20 / 2002
Mailing Address PO BOX 620062		Amount of Each Disbursement this Period 500.00
City MIDDLETON	State WI	
Purpose of Disbursement Senate Candidate Contribution		Transaction ID: SB23.4547
Candidate Name		
Office Sought: House X Senate President	Disbursement For: 2002 Primary X General Other (specify) ▼	
State: WI	District: 00	

SUBTOTAL of Disbursements This Page (optional) 2000.00

TOTAL This Period (last page this line number only) 2000.00

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)								PAGE 23/31
	<input type="checkbox"/> 21b 28	<input type="checkbox"/> 22 27	<input checked="" type="checkbox"/> 23 28a	<input type="checkbox"/> 24 28b	<input type="checkbox"/> 25 28c	<input type="checkbox"/> 26 28d	<input type="checkbox"/> 27 28e	<input type="checkbox"/> 28 28f	<input type="checkbox"/> 29

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NAME OF COMMITTEE (In Full)
ARMENIAN AMERICAN PAC (ARMENPAC)

Full Name (Last, First, Middle Initial) A. MCCONNELL MITCH		Date of Disbursement 09 / 20 / 2002
Mailing Address PO BOX 1488 City: LOUISVILLE State: KY Zip Code: 40201		Amount of Each Disbursement this Period 1000.00
Purpose of Disbursement Senate Candidate Contribution Candidate Name		Category/Type
Office Sought: House Senate President	Disbursement For: 2002 Primary X General Other (specify) ▼	Transaction ID: SB23.4573
State: District:		

Full Name (Last, First, Middle Initial) B. MCCOTTER THADDEUS G		Date of Disbursement 09 / 03 / 2002
Mailing Address 39202 LYNDON City: LIVONIA State: MI Zip Code: 48154		Amount of Each Disbursement this Period 500.00
Purpose of Disbursement House Candidate Contribution Candidate Name		Category/Type
Office Sought: House Senate President	Disbursement For: 2002 Primary X General Other (specify) ▼	Transaction ID: SB23.4575
State: District:		

Full Name (Last, First, Middle Initial) C. MENENDEZ ROBERT		Date of Disbursement 09 / 13 / 2002
Mailing Address 517 15TH STREET City: UNION CITY State: NJ Zip Code: 07087		Amount of Each Disbursement this Period 1000.00
Purpose of Disbursement House Candidate Contribution Candidate Name		Category/Type
Office Sought: House Senate President	Disbursement For: 2002 Primary X General Other (specify) ▼	Transaction ID: SB23.4638
State: District:		

SUBTOTAL of Disbursements This Page (optional) 2500.00
TOTAL This Period (last page this line number only)

20020903 10:00 AM

SCHEDULE B	ITEMIZED DISBURSEMENTS	Use separate schedules for each category of the Detailed Summary Page	9 / 10
			FOR LINE NUMBER 23

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NAME OF COMMITTEE (In Full)
Armenian American Political Action Committee

Full Name, Mailing Address, and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
LAZIO 2000 INC 72 EAST MAIN ST SUITE 4 C/O PICCIRILLO & LAMONT LLP BABYLON NY 11702	(Senate - NY - 02) Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) :	03/08/2000	1000.00
LINCOLN CHAFFEE US SENATE PO BOX 7329 WARWICK RI 02887	(Senate - RI - 00) Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) :	08/08/2000	1000.00
LINCOLN DIAZ-BALART FOR CONGRESS COMMITTEE 9737 NW 41 ST. #131 MIAMI FL 33178	(House - FL - 23) Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) :	08/06/2000	1000.00
LOT OF PEOPLE FOR DAVE GSEY PO BOX 1322 WAUSAU WI 54402	(House - WI - 07) Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) :	08/08/2000	1000.00
MCCONNELL SENATE COMMITTEE '02 PO BOX 1496 LOUISVILLE KY 40201	(Senate - KY - 00) Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) :	09/06/2000	1000.00
MENENDEZ FOR CONGRESS PO BOX 848 UNION CITY NJ 07087	(House - NJ - 13) Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) :	08/06/2000	1000.00
PALLONE FOR CONGRESS PO BOX 3178 LONG BRANCH NJ 07740	(House - NJ - 05) Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) :	08/06/2000	1000.00
RE-ELECT CONGRESSMAN JOE MOAKLEY COMMITTEE 641 TREMONT ST 3RD FLOOR BOSTON MA 02111	(House - MA - 09) Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) :	09/06/2000	1000.00
ROBE FOR THE SENATE POST OFFICE BOX 1279 MCLEAN VA 22101	(Senate - VA - 00) Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) :	09/06/2000	1000.00

SUBTOTALS of Disbursements This Page (Optional)

TOTALS This Period (last page this line number only)

2025 RELEASE UNDER E.O. 14176

2025.08.27 10:00:00