



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

JAN 21 1998

R. Edward Ingle, Treasurer
Wexler Group Political Action Committee
1317 F Street NW, Suite 600
Washington, DC 20004

Identification Number: C00248195

Reference: December Monthly Report (11/1/97-11/30/97)

Dear Mr. Ingle:

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:

-The beginning cash balance of this report should equal the ending balance of your November Monthly Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

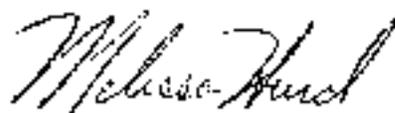
-All of the Column B totals of the Summary and Detailed Summary Pages appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-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 deducted during each payroll period. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

-Please identify the name and address of the recipient committee, as well as the purpose, for the in-kind contribution(s) disclosed on Schedule B for Line 23.

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,

A handwritten signature in cursive script that reads "Melissa Hurd".

Melissa Hurd
Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

SCHEDULE A		ITEMIZED RECEIPTS		Use separate schedule for each category of tax	PAGE	OF
Contributions from Individuals				Donated Summary Page	FOR LINE NUMBER	11(a)(1)
Any information shown on both Reports and Schedules may not be used by any person for the purpose of collecting contributions or for determining purposes other than using the name and address of any political committee to solicit contributions from such contributors.						
NAME OF COMMITTEE OR FUND National Organization PAC 00000001						
A. Full name, mailing address and ZIP Code		Name of Employer		Date received, day, year	Amount of Each Receipt (See Form)	
Anne Sullivan 21 18th Street City, State ZIP		National Organization, Inc.		payroll deduction	\$50.00	
Receipt For: <input type="checkbox"/> Other receipt <input type="checkbox"/> Primary <input type="checkbox"/> General		Occupation Branch Manager		Applicable Year-to-Date >	(\$15 biweekly) \$25.00	
B. Full name, mailing address and ZIP Code		Name of Employer		Date received, day, year	Amount of Each Receipt (See Form)	
Rodney Jones 551 Hainsbury Road City, State ZIP		National Organization, Inc.		payroll deduction	\$120.00	
Receipt For: <input type="checkbox"/> Other receipt <input type="checkbox"/> Primary <input type="checkbox"/> General		Occupation Vice President		Applicable Year-to-Date >	(\$20 biweekly) \$80.00	

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

IN-KIND CONTRIBUTIONS

SCHEDULE A		ITEMIZED RECEIPTS		Use separate schedule for each category of tax	PAGE	OF
Contributions from Individuals				Donated Summary Page	FOR LINE NUMBER	11(a)(1)
Any information shown on both Reports and Schedules may not be used by any person for the purpose of collecting contributions or for determining purposes other than using the name and address of any political committee to solicit contributions from such contributors.						
NAME OF COMMITTEE OR FUND National Organization PAC 00000001						
A. Full name, mailing address and ZIP Code		Name of Employer		Date received, day, year	Amount of Each Receipt (See Form)	
Martin L. Kress 4 River Road City, State ZIP		National Organization, Inc.		8/19/64	\$3,999.00 (IN-KIND) (RAFFLE PRIZE)	
Receipt For: <input type="checkbox"/> Other receipt <input type="checkbox"/> Primary <input type="checkbox"/> General		Occupation Chairman		Applicable Year-to-Date >	\$3,999.00	

SCHEDULE B		ITEMIZED DISBURSEMENTS		Use separate schedule for each category of tax	PAGE	OF
Operating Expenditures/Other Federal				Donated Summary Page	FOR LINE NUMBER	21(b)
Any information shown on both Reports and Schedules may not be used by any person for the purpose of collecting contributions or for determining purposes other than using the name and address of any political committee to solicit contributions from such contributors.						
NAME OF COMMITTEE OR FUND National Organization PAC 00000001						
A. Full name, mailing address and ZIP Code		Purpose of Disbursement		Date received, day, year	Amount of Each Disbursement (See Form)	
Martin L. Kress 4 River Road City, State ZIP		raffle prize		8/19/64	\$3,999.00 (IN-KIND CONTRIBUTION)	
Receipt For: <input type="checkbox"/> Other receipt <input type="checkbox"/> Primary <input type="checkbox"/> General		Disbursement to <input type="checkbox"/> Primary <input type="checkbox"/> General		Other (Specify)		

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.B(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(1) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—\$105 below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), 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 page 8 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.

MJ

