HUMAN
RIGHTS
CAMPAIGN

APR 28 11 27 AM '97

April 25, 1997

John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Dear Mr. Gibson:

This letter is in response to your correspondence of April 3, 1997 requesting additional information about our October Monthly report (9/1/96-9/30/96) and our March 21 response to your March 12 letter.

When Mr. Leppen gave $5,000 to the PAC in September of 1996 it was part of a larger contribution totaling $12,500, $7,500 of which was intended as a contribution to the Human Rights Campaign, the 501(c)(4) connected to the PAC. Though this is not our usual practice, the entire check for $12,500 was deposited in the PAC. On September 9, six days after the initial deposit, $7,500 was transferred to the Human Rights Campaign, the 501(c)(4).

As stated in our March 21 letter, an apparent computer error aggregated Mr. Leppen's contributions incorrectly. While HRC has established practices to ensure individual contributions are aggregated and do not exceed the $5,000 limit, it appears that in this instance Mr. Leppen's initial $500 contribution escaped detection when the later $5,000 amount was received. Upon discovery of this error, HRC PAC refunded the $500 to Mr. Leppen. The refund will be reported on the May 20 monthly filing. We have reviewed this issue and corrected the problem and instituted additional procedures to avoid further occurrences.

You requested additional information regarding a discrepancy on Schedule A, line 11 (a)(I). The discrepancy is due to the fact that the computer aggregated the total contribution as $13,000 and carried this total through into the receipts for the month. The total receipts for the month should have been $36,784.66. We have made this adjustment and amended the appropriate reports.

Please feel free to contact PAC Director Kevin Layton if you have any additional questions or concerns.

Sincerely,

Elizabeth Birch
Treasurer

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