



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

October 19, 1995

John E. Pooler Jr., Treasurer
PH&S Federal PAC
3000 Two Logan Square
Philadelphia, PA 19103

Identification Number: C00279927

Reference: Mid-Year Report (1/1/95-6/30/95)

Dear Mr. Pooler:

This letter is to inform you that as of October 18, 1995, the Commission has not received your response to our request for additional information, dated September 27, 1995. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact T. Suzanne Shaw on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

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BQ-2

John E. Pooler, Jr., Treasurer
PH&S Federal PAC
3000 Two Logan Square
Philadelphia, PA 19103

Identification Number: C00279927 SEP 27 1995

Reference: Mid-Year Report (1/1/95-6/30/95)

Dear Mr. Pooler:

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 identification of each contributor, including the person's occupation and name of employer, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry lacking a contributor's employer.

Note: If your committee has made attempts, either by a written request or by an oral request documented in writing to obtain this information from each contributor, your committee may have exercised "best efforts." Under revised 11 CFR 104.7(b), such effort shall consist of an initial clear and conspicuous request for the name, mailing address, occupation, and name of employer of each individual who has contributed over \$200 in the calendar year which informs the contributor that the reporting of such information is required by law. If necessary, your committee must make a written follow-up request or an oral follow-up request documented in writing, within thirty days with no additional solicitation. Subsequently, the committee should report any changes provided by the contributor or any additional information which is in the committee's records. If you believe that your committee satisfies the "best efforts" provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contribution information. Clarification regarding "best efforts" should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. 11 CFR §104.3(a)(4)(i)

-On Schedule A supporting Line 11(a)(1) of the Detailed Summary Page, your report disclosed contributions from individuals that omit the dates of receipt and aggregate year-to-date totals. Please amend your report by supplying the information. 11 CFR §104.3(a)(4)(i)

-Your report includes computer produced formats of Schedule A. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

-Line 11(a)(1) of the Detailed Summary Page of your report discloses a total of \$55,325.00 in contributions from individuals. The sum of the entries itemized on Schedule A, however, indicates the total to be \$55,648.00. Please amend your report to clarify the discrepancy.

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,

T. Suzanne Shaw
T. Suzanne Shaw
Reports Analyst
Reports Analysis Division

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