RQ-3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 3, 2000

Rachael Malloy, Treasurer
IMC Global Operations Inc.
Political Action Committee
2100 Sanders Road
Northbrook, IL 60062

Identification Number: C00225367

Reference: Mid-Year Report (1/1/99-6/30/99)

Dear Ms. Malloy:

This letter is to inform you that as of February 2, 2000, the Commission has not received your response to our request for additional information, dated January 12, 2000. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

The Commission is in receipt of your Amended Statement of Organization and 1999 Year End Report dated January 17 and 19, 2000, respectively; however, they do not address the issues in our letter. 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 regarding this matter, please contact Lucy J. Denny on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Rachael Malloy, Treasurer
IMC Global Operations Inc.
Political Action Committee
2100 Sanders Road
Northbrook, IL 60062

JAN 12 2000

Identification Number: C00225367

Reference: Mid-Year Report (1/1/99-6/30/99)

Dear Ms. Malloy:

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 1998 Year End Report. Please clarify this discrepancy and amend any subsequent report(s) 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 that was deducted each pay period. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Administrative expenses should be properly disclosed on a separate Schedule B, supporting Line 21(b) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

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) 694-1130.

Sincerely,

Lucy J. Denny
Reports Analyst
Reports Analysis Division

## PAYROLL DEDUCTIONS

SCHEDULE A — ITEMIZED RECEIPTS

Contributions from Individuals

PAGE ___ OF ___

FOR LINE NUMBER 11(a)(i)

NAME OF COMMITTEE (in Full): National Organization PAC C00000001

| Full Name, Mailing Address and ZIP Code | Name of Employer / Occupation | Date (month, day, year) | Amount of Each Receipt this Period |
|---|---|---|---|
| Anne Sullivan<br>81 15th Street<br>City, State ZIP | National Organization, Inc.<br>Branch Manager | payroll deduction | $60.00<br>($15 biweekly) |
| | Aggregate Year-to-Date > $ | 285.00 | |
| Rodney Jones<br>881 Hamsbury Road<br>City, State ZIP | National Organization, Inc.<br>Vice President | payroll deduction | $120.00<br>($30 biweekly) |
| | Aggregate Year-to-Date > $ | 360.00 | |

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

## IN-KIND CONTRIBUTIONS

SCHEDULE A — ITEMIZED RECEIPTS

Contributions from Individuals

PAGE ___ OF ___

FOR LINE NUMBER 11(a)(i)

NAME OF COMMITTEE (in Full): National Organization PAC C00000001

| Full Name, Mailing Address and ZIP Code | Name of Employer / Occupation | Date (month, day, year) | Amount of Each Receipt this Period |
|---|---|---|---|
| Marvin L. Kress<br>4 River Road<br>City, State ZIP | National Organization, Inc.<br>Chairman | 6/19/94 | $3,999.00<br>(IN-KIND: CRAFTS PRIZE) |
| | Aggregate Year-to-Date > $ | 3,999.00 | |

SCHEDULE B — ITEMIZED DISBURSEMENTS

Operating Expenditures/Other Federal

PAGE ___ OF ___

FOR LINE NUMBER 21(b)

NAME OF COMMITTEE (in Full): National Organization PAC C00000001

| Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
|---|---|---|---|
| Marvin L. Kress<br>4 River Road<br>City, State ZIP | raffle prize | 6/19/94 | $3,999.00<br>(IN-KIND CONTRIBUTION) |

*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. 104.8(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)(ii) 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—still 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 5 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 left.