

FEDERAL
ADMINIS

OCT 20 9 56 AM '94

Clean Up Congress
1101 N. Highland St.
Suite 404
Arlington, VA 22201
October 18, 1994

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

Identification number: C00245456

Reference: (a) 12 Day Pre-Convention Report (4/1/94-5/15/94)
(b) July Quarterly Report (5/16/94-6/30/94)
(c) 12 Day Pre-Mary Report (7/1/94-7/15/94)

Dear Mr. Gibson,

I am responding to your three letters to me of October 6, 1994.

You note in all three letters that in my September 19, 1994 letter to you, I failed to respond to the Commission's September 14, 1994 questions about information in our reports that "falls outside the reporting period."

Gops. I read the Commission's September 14 letters too hastily and noticed only a separate question about Clean Up Congress's use of Schedule E vs. Schedule B. I responded to that question almost instantly, on September 19. I didn't answer the other question in the Commissions' September 14 letters because I did not notice it. I apologize for this oversight and will read Commission correspondence more carefully in the future.

Now I will respond to the statement in your October 6, 1994 letters that Clean Up Congress reports appear to contain information that "falls outside the reporting period."

I assume that you refer to the payments itemized on our Schedules B and E that are dated after the end of the reporting period. The fact that these payments are dated after the end of the reporting period does not mean that the payments themselves were made after the end of the reporting period. The dates that I write on Schedules B and E are always the dates of the appropriate check (Clean Up Congress never uses cash). Sometimes it is necessary for me to write a check after the end of the reporting period for a payment that Clean Up Congress made DURING the reporting period. For example, Clean Up Congress frequently runs Help Wanted ads in the Washington Post. The Post runs the ad, then sends us a bill. Frequently an ad runs during the reporting period, but we do not receive the bill until after the

94039340965

9 4 0 3 9 3 4 0 8 5 6

end of the reporting period. So I write a check after the end of the reporting period, and the date on the check becomes the date that I write alongside that itemized expenditure on Schedule E. Thus it may appear to someone reading Clean Up Congress's Schedule E that the ad ran after the end of the reporting period when the ad actually ran during the reporting period.


It is not only vendors who bill Clean Up Congress after the end of reporting periods. Our field staff in Minneapolis, Ann Arbor (which has since closed), and Seattle incur expenses and then send in requisitions seeking to be reimbursed. Often I write the reimbursement checks during the two or three days I set aside for compiling the FEC report. At this point the end of the reporting period has already come and gone, so both the checks I write and the itemized expenditures in Clean Up Congress's reports are dated after the end of the reporting period -- even though the expenditures themselves were made during the reporting period.

There is one more reason why Clean Up Congress's itemized expenditures often bear dates that are after the end of the reporting period. Some of Clean Up Congress's expenditures, especially salaries, overlap the boundaries of reporting periods. Here's an example. Our paychecks cover a two-week period. Let's say a pay period began on June 23 and ended on July 5. The paychecks cover work done both during the First Quarter and work done during the Second Quarter. There is no easy way to pro-rate the checks between the two quarters, since most of our staff earns a different amount of money every day (depending on how much money they raise to help cover their salary costs). Thus the paychecks must be reported entirely in the First Quarter or entirely in the Second Quarter. We at Clean Up Congress always choose to report these overlapping checks in the earlier quarter, since the mission of the Federal Election Commission is not jeopardized by obtaining information too early, only by obtaining it too late.

I wish I could have been less verbose with this explanation, but I hope it is at least clear. We have tried to solve the problems mentioned above as well as we can. But we recognize that the Commission has a lot more experience with these problems than we do. So if you want us to handle these problems in some other way, we will of course cheerfully do so.

I may be reached at (703) 841-1994.

Sincerely,



Abner L. Holton

**Federal Election Commission
 ENVELOPE REPLACEMENT PAGE
 FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

Hand Delivered

DATE OF RECEIPT

First Class Mail

POSTMARKED

10/16/94

Registered/Certified Mail

POSTMARKED

No Postmark

Postmark Illegible

Received from the House Office of Records
 and Registration

DATE OF RECEIPT

Received from the Senate Office of Public
 Records

DATE OF RECEIPT

Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

J.A.Q.
 PREPARER

10/21/94
 DATE PREPARED

9
4
0
3
9
3
4
0
8
6
7