



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

RQ-2

Timothy M. Schellberg, Treasurer  
Sagem Morpho Inc. Political Action Committee  
(SAGEM MORPHO INC PAC)  
1102 Broadway Plaza, Suite 403  
Tacoma, WA 98402

JUN 04 2003

Identification Number: C00357566

Reference: Year End Report (7/1/01 -12/31/01)

Dear Mr. Schellberg:

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:

-Schedule A of your report discloses the receipt of funds from your connected organization (pertinent portion(s) attached). 2 U.S.C. §441b prohibits the receipt of funds from national banks, corporations, and labor organizations. Under 11 CFR §114.5(b)(3), however, a separate segregated fund may be reimbursed for any solicitation or other administrative expense provided that the reimbursement is made no later than thirty days after the expense was paid by the separate segregated fund.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. Please provide further clarifying information regarding the date(s) on which the committee made payments for any solicitation or other administrative expenses.

To the extent that the reimbursement was made beyond thirty days after the expense was paid, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to your

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connected organization of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from your connected organization for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR 103.3(b)(1).

Please inform the Commission of your corrective action immediately in writing and provide a copy of your check for any transfer-out or refund. In addition, any transfer-out or refund made should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the date on which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to refund or transfer-out the amount will be taken into consideration.

A 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. Electronic filers must file amendments (to include statements, designation and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Brandy Phillips  
Campaign Finance Analyst  
Reports Analysis Division

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

Use separate schedule(s)  
or each category of the  
Detailed Summary Page

FOR LINE NUMBER: PAGE 5/11

(check only one)

11a  11b  11c  12  
13 14 15 16 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)  
Sagem Morpho Inc. Political Action Committee

**A.** Full Name (Last, First, Middle Initial)  
Sagem Morpho Inc.

Mailing Address  
1145 Broadway Plaza Suite 200  
City State Zip Code  
Tacoma WA 98402

Date of Receipt  
M M / D D / Y Y Y  
08 15 2001

FEC ID number of contributing federal political committee.

Name of Employer Occupation  
Receipt For: Primary General Other (specify) ▼  
Aggregate Year-to-Date ▼ 2500.00

Amount of Each Receipt this Period  
2500.00

Contribution to PAC

Transaction ID: SA11A1.4234

**B.** Full Name (Last, First, Middle Initial)  
Sagem Morpho Inc.

Mailing Address  
1145 Broadway Plaza Suite 200  
City State Zip Code  
Tacoma WA 98402

Date of Receipt  
M M / D D / Y Y Y  
12 18 2001

FEC ID number of contributing federal political committee.

Name of Employer Occupation  
Receipt For: Primary General Other (specify) ▼  
Aggregate Year-to-Date ▼ 5000.00

Amount of Each Receipt this Period  
2500.00

Contribution to PAC

Transaction ID: SA11A1.4236

**C.**

SUBTOTAL of Receipts This Page (optional) .....	5000.00
TOTAL This Period (last page this line number only) .....	5000.00

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