



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

FEB 23 2000

Anthony T. Moonis, Treasurer  
GOPAC Incorporated  
122 C Street, NW, #505  
Washington, DC 20001

Identification Number: C00251801

Reference: Termination Report (12/1/99-12/31/99)

Dear Mr. Moonis:

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 D of your Termination Report discloses separate debts for both federal and non-federal activity and also indicates that \$49,604 in outstanding "non-federal" debts have been transferred to GOPAC Non-Federal (pertinent portions attached). On previous reports these debts were disclosed as having been incurred for shared allocable activity and payments on these debts were disclosed on Schedule H4 as shared expenditures. Transfers from your non-federal account were disclosed on Schedule H3 to pay for a portion of these expenditures based on your committee's allocation ratio for shared federal/non-federal administrative expenses. If these obligations were incurred for shared federal/non-federal activity 11 CFR §106.6 requires that these expenses be paid from the federal account and allows the non-federal account to transfer-in its share of the expense no more than 10 days before or 60 days after payment by the federal account. No portion of any debt which was incurred by your committee for shared allocable activity may be transferred to your non-federal account. Debts for 100% federal or non-federal activity do not fall within the definition of an allocable expense. Any transfers received by your federal account from your non-federal account to pay for 100% federal or non-federal debts constitute an impermissible receipt of funds by your federal account.

Please provide an explanation regarding the apparent reclassification of these obligations from debts for shared allocable activity to debts for 100%

federal and non-federal activity. If these obligations represent debts for 100% federal and non-federal activity please clarify your committee's prior disclosure of payments for these debts as shared expenditures. To the extent that your committee has received transfers from your non-federal account to pay for 100% federal or non-federal activity, the Commission recommends that you immediately transfer the funds received back to your non-federal account. If this apparent change in the status of your committee's debts is in error your committee must continue to pay 100% of any shared allocable expenses from your federal account. Please amend your report to address these apparent discrepancies. Be advised that your committee may not transfer any debts to your non-federal account and must continue to file all required reports with the Commission until this matter has been resolved. The Commission will notify you when your request to terminate has been approved and the committee is no longer required to file reports with the Commission.

-The Detailed Summary Page, on Line 18 Column B of your report, discloses \$1,344,162 in transfers from the non-federal account for joint activity for the calendar year. However, Line 21 (a)(ii) Column B discloses \$1,336,875 as the non-federal share for joint activity for the calendar year. While the non-federal account is permitted to transfer funds to the federal account for allocable activity, transfers from the non-federal account for amounts greater than the non-federal share of allocable activity are prohibited by 11 CFR §102.5(a)(1)(i). Please clarify this discrepancy.

The Commission recommends that you immediately transfer back to the non-federal account, the amount which was transferred to the federal account in excess of the non-federal share. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

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,



Andrew J. Dodson  
Senior Reports Analyst  
Reports Analysis Division

**SCHEDULE D**  
 (Revised 3/80)

**DEBTS AND OBLIGATIONS**  
 Excluding Loans

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payments This Period	Outstanding Balance at Close of This Period
<del>GOPAC, Inc.</del>				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Gilbert & Wolfand, PC 2201 Wisconsin Avenue, NW Suite 320 Washington, DC 20007	2,311.60	6,065.00	8,376.60	-0-
Nature of Debt (Purpose): Accounting Services				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Nightingale Conant 1300 N. Lehigh Avenue Niles, IL 60714	179.33	-0-	179.33	-0-
Nature of Debt (Purpose): Audio Production				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Robert Dahl, Esq. 1100 Conn. Avenue, NW Suite 330 Washington, DC 20036	3,400.00	400.00	3,800.00	-0-
Nature of Debt (Purpose): Legal Services				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Sharp PO Box 105819 Atlanta, GA 30348	38.53	-0-	38.53	-0-
Nature of Debt (Purpose): Equipment Leasing				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Purchase Power PO Box 85042 Louisville, KY 40285	1,731.52	-0-	1,731.52	-0-
Nature of Debt (Purpose): Postage				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Voting Group Comm. P.O. Box 9449 Boston, MA 02209	8.30	(8.30)	-0-	-0-
Nature of Debt (Purpose): Conference Call Service				
1) SUBTOTALS This Period This Page (optional)				-0-
2) TOTALS This Period (last page this line only)				FEDERAL
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

**SCHEDULE D**  
 (Revised 3/80)

**DEBTS AND OBLIGATIONS**  
 Excluding Loans

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payments This Period	Outstanding Balance at Close of This Period
<del>GOPAC, Inc.</del>				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Xpedite systems, Inc. 466 Highway 35 Eatontown, NJ 07724		Credit Memo		
Nature of Debt (Purpose): Faxing Service	1.07	(1.07)	-0-	-0-
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				-0-
2) TOTALS This Period (last page this line only)				FEDERAL
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

AD

**SCHEDULE D**  
 (Revised 1/80)

**DEBTS AND OBLIGATIONS**  
 Excluding Loans

Name of Committee (In Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
<del>GOPAC, Inc.</del>				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Gilbert E Wolfand, PC 2201 Wisconsin Avenue, NW Suite 320 Washington, DC 20007	20,804.40	(20,804.40) **	-0-	-0-
Nature of Debt (Purpose): Accounting Services				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Nightingale Conant 7300 N. Lehigh Avenue Niles, IL 60714	1,613.93	-0-	1,613.93	-0-
Nature of Debt (Purpose): Audio Production				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Robert Dahl, Esq. 1100 Conn. Avenue, NW Suite 330 Washington, DC 20036	30,600.00	(28,800.00) ** 3,600.00	5,400.00	-0-
Nature of Debt (Purpose): Legal Services				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Sharp PO Box 105819 Atlanta, GA 30348	346.70	-0-	346.70	-0-
Nature of Debt (Purpose): Equipment Leasing				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Vielog Group Comm P.O. Box 9449 Boston, MA 02208	74.76	Credit Memo (74.76)	-0-	-0-
Nature of Debt (Purpose): Conference Call Service				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Xpedite systems, Inc. 466 Highway 35 Eatontown, NJ 07724	9.69	Credit Memo (9.69)	-0-	-0-
Nature of Debt (Purpose): Faxing Service				
1) SUBTOTALS This Period This Page (optional)				-0-
2) TOTALS This Period (last page this line only)				NON-FEDERAL
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				-0-

\*\* Remaining Non-federal Debt transferred to GOPAC Non-Federal.

