

## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Sarkis J. Kechejian, Treasurer Armenian American PAC (ARMENPAC) 421 E Airport Freeway Irving, TX 75206

NOV 28 2000

Identification Number:

C00352054

Reference:

July Quarterly Report (4/01/00-6/30/00)

Dear Treasurer:

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:

Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during

each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

-Schedule B supporting Line 23 of your report discloses a contribution(s) to a candidate(s) for the Texas primary election; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. Please clarify the contribution(s) and disclose any redesignations or refunds as necessary on the appropriate schedules.

Any amendment or clarification should be filed with the Federal Election Commission. 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,

Dominick Ciaraldi

Reports Analyst

Reports Analysis Division

SCHEDULE B	ITEMIZE	D DISBURSEMENTS	for each o	rate schedule()) stegory of the	5/6
			Detailed \$	Summary Page	FOR LINE NUMBER
Any information copied from commercial purposes, other	n such Reports and Statement rithan using the name and ad-	ts may not be sold or used by any person for tress of any political committee to solicit con	the purposi Iributions fro	of solidising cont on such committe	ributions or for 6.
NAME OF COMMITTEE		<del></del> -			
uli Name, Mailing Addres	is, and ZIP Code	Purpose of Diabutsement		Date (month,	Amount of Each Olsburgement This
LLOYO DOGGETT PD BOX 5843		(Hause - TX - 10) contribution	!	day, year) ()4/02/2000	Perlod 500.00
AUSTIN	TX 78763	Diabursement for: X Primary Dither (specify):	General	7x PRIMA 5 3.14.1	0
Full Name, Mailing Address, and 2IP Code		Purpose of Disbursement		Dale (month,	Amount of Each Disbursement This
NANCY PELOSI		(House - CA - 08)		day, year) 06/26/2000	Period 1000.00
2640 BROADWAY			VICI		1000.00
SAN FRANCISCO	CA 94115	Disbursement for: Primary Other (specify) :	<u> </u>		

SUBTOTALS of Disbursements This Page (Optional)

TOTAL5 This Period (last page this line number only) ......

1500.00

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