



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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James G. Maguire, Treasurer
Ernst & Young Political
Action Committee
1200 19th Street NW, Suite 400
Washington, D.C. 20036

JAN 13 1994

Identification Number: C00227744

Reference: February Monthly (1/1/93-1/31/93), March Monthly (2/1/93-2/28/93), April Monthly (3/1/93-3/31/93), May Monthly (4/1/93-4/30/93), June Monthly (5/1/93-5/31/93), July Monthly (6/1/93- 6/30/93), August Monthly (7/1/93-7/31/93), September Monthly (8/1/93-8/31/93), October Monthly (9/1/93- 9/30/93), November Monthly (10/1/93-10/31/93) and December Monthly (11/1/93-11/30/93) Reports

Dear Mr. Maguire:

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 of the Detailed Summary Page. (2 U.S.C. §434(b)(5)) 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 (60) days or more. 11 CFR §104.11

PLEASE NOTE: Should your committee have a non-federal account(s), these administrative expenses MUST be disclosed on Lines 18, 21(a)(i) and 21(a)(ii) of the Detailed Summary Page and Schedules H2, H3 and H4 (and possibly Schedule H1 if it has not previously been filed). (See 11 CFR §106.6(b)(2)(i).

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's

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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.

Please provide clarification regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations. Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year.

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) 219-3580.

Sincerely,

Debbie Manzano

Debbie Manzano
Reports Analyst
Reports Analysis Division

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