



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Jody Thomas, Treasurer
American Renewal PAC
2032 Meadow Springs Drive
Vienna, VA 22182

MAY 20 1998

Identification Number: C00221861

Reference: Year End (7/1/97-12/31/97), February Monthly (1/1/98-2/18/98)
and April Quarterly (2/19/98-3/31/98) Reports

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.

-It has come to the attention of the Federal Election Commission that the reports you have filed during the current election cycle do not reflect the appropriate coverage dates for quarterly filing status. Please be advised of the filing dates and coverage periods for the 1997-1998 election cycle and fill in the appropriate dates on Line 5 of the Summary Page.

| <u>Report Type</u> | <u>Coverage Dates</u> | <u>Due Date</u> |
|---------------------|-----------------------|------------------|
| Mid-Year | 1/1/97-6/30/97 | July 31, 1997 |
| Year End | 7/1/97-12/31/97 | January 31, 1998 |
| April Quarterly | 1/1/98-3/31/98 | April 15, 1998 |
| July Quarterly | 4/1/98-6/30/98 | July 15, 1998 |
| October Quarterly | 7/1/98-9/30/98 | October 15, 1998 |
| 12 Day Pre-General | 10/1/98-10/14/98 | October 22, 1998 |
| 30 Day Post-General | 10/15/98-11/23/98 | December 3, 1998 |
| Year End | 11/24/98-12/31/98 | January 31, 1999 |

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,

Andrea Wilkens

Andrea Wilkens
Reports Analyst
Reports Analysis Division