



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Abner L. Holton, Treasurer
Clean Up Congress PKA Accountability
Project (Willamette Citizens)
1101 N. Highland Street, #404
Arlington, VA 22201

SEP 14 1994

Identification Number: C00245456

Reference: Year End (7/1/93-12/31/93) and April Quarterly
(1/1/94-3/31/94) Reports

Dear Mr. Holton:

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 E, supporting Line 24 of the Detailed Summary Page, discloses disbursements which do not appear to be independent expenditures. Under 11 CFR §100.16, an independent expenditure is defined as:

"an expenditure for a communication by a person expressly advocating the election or defeat of a clearly identified candidate which is made without cooperation or consultation with any candidate, or any authorized committee or agent of such candidate, and which is not made in concert with, or at the suggestion of, any candidate, or any authorized committee or agent of such a candidate."

Please provide additional information to clarify the following "purposes of disbursement": salary, xeroxing, phone, rent, travel, pizza, etc. These "purposes" do not appear to reflect expenditures for communications. Also, any disbursements reported on Schedule E, which do not qualify as independent expenditures should be properly disclosed on Schedule B for Line 21 as operating expenditures.

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,



Jan McBride
Reports Analyst
Reports Analysis Division

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