



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Robert A. Skelly, Treasurer
Raytheon Company Political
Action Committee
141 Spring Street
Lexington, MA 02173

JUN 10 1998

Identification Number: C00097568

Reference: April Quarterly Report (1/1/98-3/31/98)

Dear Mr. Skelly:

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:

-Please clarify your relationship, if any, with Hughes Electronic Corporation Active Citizenship Fund which appears to be an affiliated committee. For further guidance on the question of affiliation, please refer to 11 CFR §100.5(g). If your committee is affiliated with Hughes Electronic Corporation Active Citizenship Fund, you should amend your Statement of Organization to reflect this relationship on Line 6.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee and its affiliates from receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions,

transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-A review of the reports filed by your committee (pertinent portion(s) attached) indicates that your committee received a transfer(s) from Hughes Electronic Corporation Active Citizenship Fund which has not been disclosed on their report(s) of receipts and disbursements (i.e. the 1/7/98 and 1/26/98 receipts of \$60,000 and \$3,225, respectively). Please provide clarifying information regarding the source of the transfer(s) received by your committee.

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,



Neil Evans
Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 1 OF 1
FOR LINE NUMBER 12

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

RAYTHEON POLITICAL ACTION COMMITTEE - I.D. NO.: C00097568

A. Full Name, Mailing Address and ZIP Code Hughes Electronic Corporation Active Citizenship Fund 7200 Hughes Terrace, C-129 Los Angeles, CA 90045	Name of Employer transfer from affiliated committee	Date (month, day, year) 1/07/98	Amount of Each Receipt This Period 60,000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
B. Full Name, Mailing Address and ZIP Code Hughes Electronic Corporation Active Citizenship Fund 7200 Hughes Terrace, C-129 Los Angeles, CA 90045	Name of Employer transfer from affiliated committee	Date (month, day, year) 1/14/98	Amount of Each Receipt This Period 1,586.64
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
C. Full Name, Mailing Address and ZIP Code Hughes Electronic Corporation Active Citizenship Fund 7200 Hughes Terrace, C-129 Los Angeles, CA 90045	Name of Employer transfer from affiliated committee	Date (month, day, year) 1/26/98	Amount of Each Receipt This Period 3,225.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
SUBTOTAL of Receipts This Page (optional)			64,811.64
TOTAL This Period (last page this line number only)			64,811.64

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