



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

OCT 24 1997

John C. Runyan, Treasurer
Voluntary Contributors for Better
Government
1101 Pennsylvania Ave. NW, Ste. 200
Washington, DC 20004

Identification Number: C00034405

Reference: September Monthly Report (8/1/97-8/31/97)

Dear Mr. Runyan:

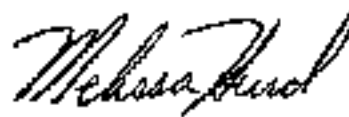
This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the frequency of all deductions. Additionally, many deductions do not total the amount deducted for the period. Please clarify this discrepancy. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

-Your report includes computer produced formats of various Schedules A and B. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

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. My local number is (202) 219-3580.

Sincerely,

A handwritten signature in cursive script, appearing to read "Melissa Hurd".

Melissa Hurd
Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

SCHEDULE A		ITEMIZED RECEIPTS		Use source schedule for each category in the Combined Summary Page	PAGE	OF
Contributions from Individuals					FOR LINE NUMBER	
Any information copied from each Report and Statement 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 person to solicit contributions from such contributors.					11(a)(1)	
NAME OF COMMITTEE (in full) National Organization PAC 000000001						
A. Full Name, Mailing Address and ZIP Code		Name of Employer		Date entered, day, year	Amount of Each Receipt, Per Period	
Anne Sullivan 21 18th Street City, State ZIP		National Organization, Inc.		payroll deduction	\$90.00	
Receipt for: ☐ Other (specify) ☐ Primary ☐ General		Occupation Branch Manager		Aggregate Year-to-Date >	(\$15 biweekly)	
B. Full Name, Mailing Address and ZIP Code		Name of Employer		Date entered, day, year	Amount of Each Receipt, Per Period	
Rodney Jones 881 Helmsbury Road City, State ZIP		National Organization, Inc.		payroll deduction	\$190.00	
Receipt for: ☐ Other (specify) ☐ Primary ☐ General		Occupation Vice President		Aggregate Year-to-Date >	(\$80 biweekly)	

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

IN-KIND CONTRIBUTIONS

SCHEDULE A		ITEMIZED RECEIPTS		Use source schedule for each category in the Combined Summary Page	PAGE	OF
Contributions from Individuals					FOR LINE NUMBER	
Any information copied from each Report and Statement 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 person to solicit contributions from such contributors.					11(a)(2)	
NAME OF COMMITTEE (in full) National Organization PAC 000000001						
A. Full Name, Mailing Address and ZIP Code		Name of Employer		Date entered, day, year	Amount of Each Receipt, Per Period	
Martin L. Kress 4 River Road City, State ZIP		National Organization, Inc.		8/19/94	\$3,999.00	
Receipt for: ☐ Other (specify) ☐ Primary ☐ General		Occupation Chairman		Aggregate Year-to-Date >	(\$999.00 RAFFLE PRIZE)	

SCHEDULE B		ITEMIZED DEDUCTIONS		Use separate schedule for each category in the Combined Summary Page	PAGE	OF
Operating Expenditures/Other Federal					FOR LINE NUMBER	
Any information copied from each Report and Statement 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 person to solicit contributions from such contributors.					21(b)	
NAME OF COMMITTEE (in full) National Organization PAC 000000001						
A. Full Name, Mailing Address and ZIP Code		Nature of Deduction		Date entered, day, year	Amount of Each Deduction, Per Period	
Martin L. Kress 4 River Road City, State ZIP		raffle prize		8/19/94	\$3,999.00	
Receipt for: ☐ Other (specify) ☐ Primary ☐ General		Deduction for: ☐ Primary ☐ General		(IN-KIND CONTRIBUTION)		

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.6(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(ii) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See page 8 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at right.

