



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Samuel S.M. Wai, Treasurer
American Crystal Sugar Company
Political Action Committee
101 North Third Street
Moorhead, MN 56560

OCT 25 2000

Identification Number: C00110338

Reference: August Monthly Report (7/1/00-7/31/00)

Dear Mr. Wai:

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:

-The beginning cash balance of this report should equal the ending balance of your Amended July Monthly Report dated 10/11/00. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Your calculations for Line 8 appear to be incorrect. Cash-on-hand at the close of the current reporting period should always equal the closing calendar year-to-date cash-on-hand amount. Please provide the corrected total on the Summary Page.

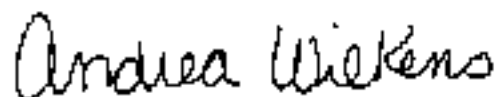
-Please provide the total(s) for Line 15, Column B of the Detailed Summary Page. Note that changes in your figures may affect your Column B totals on this report and/or on subsequent reports.

-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 amount deducted per pay period. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

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 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Andrea Wilkens

Senior Reports Analyst

Reports Analysis Division

PAYROLL DEDUCTIONS

SCHEDULE A		ITEMIZED RECEIPTS		Use this schedule to report receipts of the public primary fund	PAGE	OF
Contributions from Individuals				FOR LINE NUMBER 11(a)(3)		
Any information shown from such Reports and Statements may not be used by any person for the purpose of soliciting contributions or for campaign purposes, other than using the name and address of any political committee to solicit contributions from such committee.						
NAME OF COMMITTEE (in full) National Organization PAC 000000001						
A. Full Name, mailing address and ZIP Code		Name of Employer		Date (month, day, year)	Amount of Each Payment (in Dollars)	
A. J. Sullivan 31 18th Street City, State ZIP		National Organization, Inc.		payroll deduction	\$80.00	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General		Occupation Branch Manager		Aggregate Year-to-Date	(\$15 biweekly) \$240.00	
B. Full Name, mailing address and ZIP Code		Name of Employer		Date (month, day, year)	Amount of Each Payment (in Dollars)	
Rodney Jones 881 Hainsbury Road City, State ZIP		National Organization, Inc.		payroll deduction	\$120.00	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General		Occupation Vice President		Aggregate Year-to-Date	(\$90 biweekly) \$180.00	

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

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. 104.8(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), 12 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), 18 pay periods have passed, and the manager's contributions reach \$270. 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 left.

IN-KIND CONTRIBUTIONS

SCHEDULE A		ITEMIZED RECEIPTS		Use this schedule to report receipts of the public primary fund	PAGE	OF
Contributions from Individuals				FOR LINE NUMBER 11(a)(3)		
Any information shown from such Reports and Statements may not be used by any person for the purpose of soliciting contributions or for campaign purposes, other than using the name and address of any political committee to solicit contributions from such committee.						
NAME OF COMMITTEE (in full) National Organization PAC 000000001						
A. Full Name, mailing address and ZIP Code		Name of Employer		Date (month, day, year)	Amount of Each Payment (in Dollars)	
Martin L. Kovacs 4 River Road City, State ZIP		National Organization, Inc.		8/19/84	\$3,888.00 (IN-KIND) (TRAFLET PRIZES)	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General		Occupation Chairman		Aggregate Year-to-Date	\$3,888.00	

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

SCHEDULE B		ITEMIZED DISBURSEMENTS		Use this schedule to report disbursements of the public primary fund	PAGE	OF
Operating Expenditures/Other Federal				FOR LINE NUMBER 21(b)		
Any information shown from such Reports and Statements may not be used by any person for the purpose of soliciting contributions or for campaign purposes, other than using the name and address of any political committee to solicit contributions from such committee.						
NAME OF COMMITTEE (in full) National Organization PAC 000000001						
A. Full Name, mailing address and ZIP Code		Purpose of Disbursement		Date (month, day, year)	Amount of Each Disbursement (in Dollars)	
Martin L. Kovacs 4 River Road City, State ZIP		raffle prize		8/18/84 (IN-KIND)	\$3,888.00 (CONTRIBUTION)	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General		Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		Other Receipt:		

