



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20547

RQ-3

February 27, 2003

Steven T. Kean, Treasurer  
Democratic Party of Wisconsin Federal  
Account  
222 State Street, Suite 400  
Madison, WI 53703

Identification Number: C00019331

Reference: October Quarterly Report (7/1/02-9/30/02)

Dear Mr. Kean:

This letter is to inform you that as of February 26, 2003, the Commission has not received your response to our request for additional information, dated February 5, 2003. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

An adequate response must be received at the Commission by March 19, 2003. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter, please contact Maureen Benitz on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Steven T. Kean, Treasurer  
Democratic Party of Wisconsin Federal  
Account  
222 State Street, Suite 400  
Madison, WI 53703

FEB 05 2003

Identification Number: C00019331

Reference: October Quarterly Report (7/1/02-9/30/02)

Dear Mr. Kean:

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 totals listed on Lines 6(c), 11(c), 11(d), 19 and 20, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports 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.

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the

## DEMOCRATIC PARTY OF WISCONSIN FEDERAL ACCOUNT

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information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2))  
The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

-Schedule A of your report (pertinent portion(s) attached) discloses one or more contributions which appear to be from corporations and/or labor organizations. 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations and labor organizations unless made from separate segregated funds established by the corporations and labor organizations.

## DEMOCRATIC PARTY OF WISCONSIN FEDERAL ACCOUNT

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If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you must amend your original report with clarifying information.

If you have received prohibited contributions, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR 103.3(b)(1).

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

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

-Schedule A of your report (pertinent portion(s) attached) discloses a receipt(s) of \$320.40 from the "Democratic Party of Wis-Federal". Please clarify whether this transfer(s) is from an account maintained by your committee for non-federal activity. If so, be advised that such a transfer is prohibited by 11 CFR §102.5(a)(1)(i) and the full amount of the transfer(s) should be returned to the non-federal account. Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on Schedule B supporting Line 22 of your next report.

If this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

## DEMOCRATIC PARTY OF WISCONSIN FEDERAL ACCOUNT

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Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the impermissible funds or clarification of the transaction, will be taken into consideration.

-On Schedule(s) H4 supporting Line(s) 21(a)(i) of the Detailed Summary Page, you have not included the full name and/or mailing address for several vendors listed. Please amend your report accordingly.

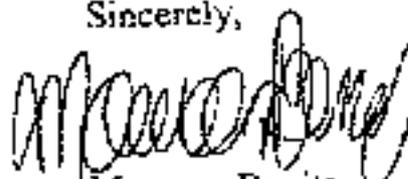
-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): "ADMINISTRATION L 0011121111" and "admin ADMINISTRATION L 0011121111". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule A of your report discloses contributions from political committees that fail to include a full and/or recognizable name. Reporting only the name of the connected organization, abbreviating the name of the committee so it is unrecognizable, or using an indistinguishable acronym is inadequate. The following committee names from your report need further clarification: "International BIBFH", "Northwestern Mutual Life", "Bricklayers and Allied Craftworkers", "Laborers Local 113", and "Milwaukee Police Association".

Please amend your report to include the missing information. 11 CFR §§100.12, 102.14(c) and 104.3(a)(4)(ii)

A response or 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. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. 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,



Maureen Benitz

Campaign Finance Analyst  
Reports Analysis Division

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER:  
(check only one)

PAGE 9 / 142

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input checked="" type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
			<input type="checkbox"/> 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions 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)  
Democratic Party of Wisconsin

Full Name (Last, First, Middle Initial)  
IBEW-COPE

Mailing Address  
1125 15th St NW

City State Zip Code  
Washington DC 20005

FEC ID number of contributing federal political committee.

Name of Employer Occupation  
VOTER FILE PURCHASE

Receipt For: Aggregate Year-to-Date ▼  
Primary General Other (specify) ▼ 5000.00

Date of Receipt  
M M / D D / Y Y Y Y  
08 / 23 / 2002

Amount of Each Receipt this Period  
4000.00

Receipt

Transaction ID: 0903200218C39236253

Full Name (Last, First, Middle Initial)  
International Association of Fire Fighters

Mailing Address  
John Stoznak 7 N Pinckney St Suite 115

City State Zip Code  
Madison WI 53703-2840

FEC ID number of contributing federal political committee.

Name of Employer Occupation

Receipt For: Aggregate Year-to-Date ▼  
Primary General Other (specify) ▼ 5000.00

Date of Receipt  
M M / D D / Y Y Y Y  
08 / 05 / 2002

Amount of Each Receipt this Period  
5000.00

Receipt

Transaction ID: 082720024C39076255

MB

Full Name (Last, First, Middle Initial)  
International BIFPH

Mailing Address  
753 State Ave

City State Zip Code  
Kansas City KS 65101

FEC ID number of contributing federal political committee.

Name of Employer Occupation

Receipt For: Aggregate Year-to-Date ▼  
Primary General Other (specify) ▼ 2500.00

Date of Receipt  
M M / D D / Y Y Y Y  
08 / 05 / 2002

Amount of Each Receipt this Period  
2500.00

Receipt

Transaction ID: 082720024C39073257

**SUBTOTAL** of Receipts This Page (optional) 11500.00

**TOTAL** This Period (last page this line number only)

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

(Use separate schedules) for each category of the Detailed Summary Page	FOR LINE NUMBER:		PAGE 28 / 142	
	(check only one)			
<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input checked="" type="checkbox"/> 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions 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)  
Democratic Party of Wisconsin

Full Name (Last, First, Middle Initial) Democratic Party Of Wis Federal		Date of Receipt M M / D D / Y Y Y Y 07 / 11 / 2002
Mailing Address 222 State Street, Suite 400		Amount of Each Receipt this Period 320.40
City Madison	State WI	
FEC ID number of contributing federal political committee.		Other Receipt
Name of Employer	Occupation	
Receipt For: Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 320.40	Transaction ID: 1013200248C39665

Full Name (Last, First, Middle Initial) Peter Research Hart		Date of Receipt M M / D D / Y Y Y Y 09 / 19 / 2002
Mailing Address 1724 CONNECTICUT AVE NW		Amount of Each Receipt this Period 1470.00
City Washington	State DC	
FEC ID number of contributing federal political committee.		Other Receipt
Name of Employer	Occupation	
Receipt For: X Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 1470.00	Transaction ID: 1013200245C39548

Full Name (Last, First, Middle Initial) M & I BANK OF SOUTHERN WISCONSIN		Date of Receipt M M / D D / Y Y Y Y 07 / 31 / 2002
Mailing Address P.O. BOX 8996		Amount of Each Receipt this Period 96.21
City Madison	State WI	
FEC ID number of contributing federal political committee.		Other Receipt
Name of Employer	Occupation	
Receipt For: Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 571.50	Transaction ID: 1013200216C39655

SUBTOTAL of Receipts This Page (optional) ..... ▶ 1876.61

TOTAL This Period (last page this line number only) ..... ▶

