



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Jerris Leonard, Treasurer  
Wisconsin Leadership PAC  
1667 K Street N.W., Suite 700  
Washington, DC 20006

MAY 08 2002

Identification Number: C00345744

Reference: Amended Year End Report (7/1/01-12/31/01), received 3/6/02

Dear Mr. Leonard:

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

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

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive 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. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

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 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.

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule(s) B supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

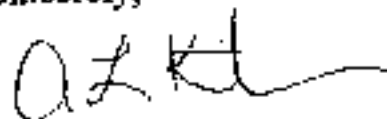
Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the

limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

A 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. Electronic filers must file amendments (to include statements, designation 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,



Antoinette Kitchen  
Senior Reports Analyst  
Reports Analysis Division

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

Use separate schedule(s) or each category of the Detailed Summary Page	FOR LINE NUMBER:		PAGE 25 / 37	
	(check only one)			
<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input checked="" type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 17
<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 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)  
Wisconsin Leadership PAC

Full Name (Last, First, Middle Initial) <b>A. INTELLECTUAL PROPERTY OWNERS ASSOCIATION POLITICAL ACTION FUND</b>		Date of Receipt M M / D D / Y Y Y Y 10 / 17 / 2001
Mailing Address 1255 23RD ST NW SUITE 200		Amount of Each Receipt this Period 500.00
City WASHINGTON	State Zip Code DC 20037	
FEC ID number of contributing federal political committee.		Transaction ID: SA11C.4772
Name of Employer	Occupation	
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 500.00	

Full Name (Last, First, Middle Initial) <b>B. MCI WORLD COM, INC. FEDERAL POLITICAL ACTION COMMITTEE</b>		Date of Receipt M M / D D / Y Y Y Y 11 / 14 / 2001
Mailing Address 1801 PENNSYLVANIA AVENUE NW		Amount of Each Receipt this Period 1000.00
City WASHINGTON	State Zip Code DC 20008	
FEC ID number of contributing federal political committee.		Transaction ID: SA11C.4772 <b>AK</b>
Name of Employer	Occupation	
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 1000.00	

Full Name (Last, First, Middle Initial) <b>C. MICROSOFT CORPORATION POLITICAL ACTION COMMITTEE</b>		Date of Receipt M M / D D / Y Y Y Y 10 / 08 / 2001
Mailing Address 16011 NE 38TH WAY BOX 97017		Amount of Each Receipt this Period 5000.00
City REDMOND	State Zip Code WA 98073	
FEC ID number of contributing federal political committee. C00227546		Transaction ID: SA11C.4775
Name of Employer	Occupation	
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 5000.00	

SUBTOTAL of Receipts This Page (optional) ..... ▶ **6500.00**

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

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

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

FOR LINE NUMBER:		PAGE 26 / 37	
(check only one)			
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			<input type="checkbox"/> 17

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NAME OF COMMITTEE (In Full)  
Wisconsin Leadership PAC

**AK**

Full Name (Last, First, Middle Initial) <b>A. MICROSOFT CORPORATION POLITICAL ACTION COMMITTEE</b>		Date of Receipt MM / DD / YYYY 10 / 08 / 2001
Mailing Address 18011 NE 36TH WAY BOX 97017		Amount of Each Receipt this Period 1101.97
City REDMOND	State Zip Code WA 98073	
FEC ID number of contributing federal political committee. C00227546		In-kind - food & bev.
Name of Employer	Occupation	
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 6101.97	Transaction ID: SA11C.4776

Full Name (Last, First, Middle Initial) <b>B. Maroono Band of Mission Indians Native American Right Fund</b>		Date of Receipt MM / DD / YYYY 10 / 17 / 2001
Mailing Address 300 N. Lee St. Suite 500		Amount of Each Receipt this Period 1000.00
City Alexandria	State Zip Code VA 22314	
FEC ID number of contributing federal political committee.		Transaction ID: SA11C.477B
Name of Employer	Occupation	
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 1000.00	

Full Name (Last, First, Middle Initial) <b>C. NATIONAL ASSOCIATION OF BEVERAGE RETAILERS POLITICAL ACTION COMMITTEE (NABRPAC)</b>		Date of Receipt MM / DD / YYYY 10 / 17 / 2001
Mailing Address 5101 RIVER ROAD SUITE 108		Amount of Each Receipt this Period 1000.00
City BETHESDA	State Zip Code MD 20816	
FEC ID number of contributing federal political committee.		Transaction ID: SA11C.4780
Name of Employer	Occupation	
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 1000.00	

<b>SUBTOTAL</b> of Receipts This Page (optional) .....	<b>3101.97</b>
<b>TOTAL</b> This Period (last page this line number only) .....	

