



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 9, 2000

RQ-3

Richard J. Hidy, Treasurer  
Firststar Corporation Civic Affairs Committee  
(FKA First Wisconsin Civic Affairs Comtee)  
777 East Wisconsin Avenue  
Milwaukee, WI 53202

Identification Number: C00041301

Reference: July Quarterly (4/1/99-6/30/99) and Year End (7/1/99-12/31/99)  
Reports

Dear Mr. Hidy:

This letter is to inform you that as of March 8, 2000 the Commission has not received your response to our requests for additional information dated February 16, 2000. These notices request 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 these requests (copies enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Kenneth Davis 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,

A handwritten signature in cursive script that reads "John D. Gibson".

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosures



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Richard J. Hidy, Treasurer  
Firststar Corporation Civic Affairs Committee  
(FKA First Wisconsin Civic Affairs Comte)  
777 East Wisconsin Avenue  
Milwaukee, WI 53202

FEB 16 2000

Identification Number: C00041301

Reference: July Quarterly Report (4/1/99-6/30/99)

Dear Mr. Hidy:

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 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.

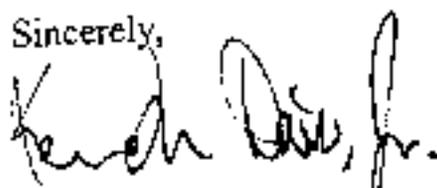
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or

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 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,



Kenneth A. Davis, Jr.  
Reports Analyst  
Reports Analysis Division

**SCHEDULE A**

**ITEMIZED RECEIPTS**

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

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)**  
**Firststar Corporation Civic Affairs Committee**

<b>Full Name, Mailing Address, and ZIP Code</b> Star Banc Corporation Political Action Committee Law Department 777 East Wisconsin Avenue Milwaukee WI 53202	<b>Name of Employer</b>  	<b>Date (month, day, year)</b> 04/02/1999 Transfer of funds to affiliated Political Action Committee	<b>Amount of Each Receipt this Period</b> 25000.00
	<b>Occupation</b>  		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date</b> > \$ 25000.00		
<b>Full Name, Mailing Address, and ZIP Code</b> Star Banc Corporation Political Action Committee Law Department 777 East Wisconsin Avenue Milwaukee WI 53202	<b>Name of Employer</b>  	<b>Date (month, day, year)</b> 05/03/1999 Transfer of funds to affiliated Political Action Committee	<b>Amount of Each Receipt this Period</b> 5000.00
	<b>Occupation</b>  		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date</b> > \$ 30000.00		
<b>Full Name, Mailing Address, and ZIP Code</b> Star Banc Corporation Political Action Committee Law Department 777 East Wisconsin Avenue Milwaukee WI 53202	<b>Name of Employer</b>  	<b>Date (month, day, year)</b> 05/12/1999 Transfer of funds to affiliated Political Action Committee	<b>Amount of Each Receipt this Period</b> 20000.00
	<b>Occupation</b>  		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date</b> > \$ 50000.00		

**SUBTOTALS** of Receipts This Page (Optional) .....

**TOTALS** This Period (last page this line number only) .....

**50000.00**

The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry, no matter how small, should be recorded to ensure the integrity of the financial data. This includes not only sales and purchases but also expenses and income. The document provides a detailed list of items that should be tracked, such as inventory levels, accounts payable, and accounts receivable. It also outlines the procedures for recording these transactions, including the use of journals and ledgers. The second part of the document focuses on the reconciliation process. It explains how to compare the company's records with bank statements and other external sources to identify any discrepancies. This process is crucial for detecting errors and preventing fraud. The document provides a step-by-step guide to performing a reconciliation, including how to identify and investigate any differences. The final part of the document discusses the importance of regular audits. It explains that audits are necessary to ensure that the financial records are accurate and that the company is in compliance with all applicable laws and regulations. The document provides a list of common audit procedures and explains how to prepare for an audit. It also discusses the role of the auditor and the importance of providing all necessary information and documentation. Overall, the document provides a comprehensive guide to financial record-keeping and auditing, covering all aspects from initial recording to final reconciliation and audit preparation.