



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

July 3, 2002

Adam Stoll, Treasurer  
21<sup>st</sup> Century Freedom PAC Federal (FKA  
Economic Freedom PAC)  
228 S. Washington Street, #200  
Alexandria, VA 22314

Identification Number: C00337261

Reference: Year End Report (7/1/01-12/31/01)

Dear Mr. Stoll:

On June 12, 2002 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Please be advised that if a committee files an amendment to a report that was filed electronically, it shall also submit the amendment in an electronic format. 11 CFR §104.18(f) Your paper filing dated June 20, 2002 will not be considered an amended report. To amend your report, you must submit it in an electronic format.

An adequate response must be received at the Commission by July 23, 2002. 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.

If you should have any questions related to this matter, please contact Scott Walker 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

JUN 12 2002

Adam Stoll, Treasurer  
21<sup>st</sup> Century Freedom PAC Federal (FKA  
Economic Freedom PAC)  
228 S. Washington Street, #200  
Alexandria, VA 22314

Identification Number: C00337261

Reference: Year End Report (7/1/01-12/31/01)

Dear Mr. Stoll:

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 be from a corporation(s). 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation. Limited liability companies (LLC's) that choose to be treated as corporations under the Internal Revenue Service rules, or have shares that are traded publicly, are considered corporations. In the event that the LLC is treated as a partnership under IRS rules, the aforementioned contributions are to be attributed to each member in direct proportion to his or her share of the LLC's profit or by agreement of its members. Each member who has contributed in excess of \$200 for the calendar year should be identified by name, address, amount of contribution, name of employer, occupation and aggregate total on Schedule A. 11 CFR §110.1(g)(1) through (5).

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

If you have received a prohibited contribution(s), 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 the 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 contribution(s) which appears to exceed the limits set forth in the Act. The Act prohibits a committee from receiving contributions from another political committee or a person in excess of \$5,000 per calendar year. 2 U.S.C. §441a(f)

The Commission notes your refund of the excessive contribution(s) disclosed on your 2002 April Quarterly Report. Although the Commission may take further legal action concerning the acceptance of an excessive contribution(s), your prompt action in refunding or transferring-out the contribution(s) will be taken into consideration.

-Schedule A of your report (pertinent portion(s) attached) discloses one or more contributions from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under

11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible.

To the extent that your committee has received prohibited funds, 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. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a 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 in transferring-out or refunding the amounts will be taken into consideration.

-Schedule A supporting Line 15 of the Detailed Summary Page discloses a refund(s) or rebate(s) of what appears to be a previously disclosed allocable expense(s) from Cathy Blaney and Associates, Inc. Please be advised that when a committee receives a refund or rebate of an allocable expense, it must be allocated between the federal and non-federal accounts according

to the same allocation ratio used to allocate the original disbursement. Furthermore, the federal account must transfer the non-federal portion to the non-federal account and disclose this transfer-out on Schedule H4. Your report does not appear to disclose a transfer-out of the non-federal portion of this refund(s) or rebate(s). Please provide clarification regarding this apparent omission.

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,



Scott Walker  
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 5/74						
	(check only one)						
<input checked="" 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"/> 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)  
**21ST CENTURY FREEDOM PAC FEDERAL (PKA ECONOMIC FREEDOM PAC)**

**A** Full Name (Last, First, Middle Initial)  
 Albert Fried and Company, LLC

Date of Receipt  
 M M Y Y  
 08 01 2001

Mailing Address  
 40 Exchange Place  
 City State Zip Code  
 New York NY 10006

Amount of Each Receipt this Period  
 500.00

FEC ID number of contributing federal political committee

Name of Employer  
 Albert Fried and Company, LLC

Occupation  
 Investment Banker

Receipt For: Aggregate Year-to-Date  
 Primary General 500.00  
 Other (specify) v

Transaction ID: SA11A1.4623

**B** Full Name (Last, First, Middle Initial)  
 Albert Fried

Date of Receipt  
 M M Y Y  
 08 01 2001

Mailing Address  
 40 Exchange Place  
 City State Zip Code  
 New York NY 10006

Amount of Each Receipt this Period  
 500.00

FEC ID number of contributing federal political committee

Name of Employer  
 Albert Fried and Company

Occupation  
 (MEMO ITEM)

Receipt For: Aggregate Year-to-Date  
 Primary General 500.00  
 Other (specify) v

Transaction ID: SA11A1.4623.0

**C** Full Name (Last, First, Middle Initial)  
 R Dimesse Baril

Date of Receipt  
 M M Y Y  
 10 28 2001

Mailing Address  
 4605 Watergap  
 City State Zip Code  
 Manhattan NY 10004

Amount of Each Receipt this Period  
 5000.00

FEC ID number of contributing federal political committee

Name of Employer  
 Washington Request

Occupation  
 Aggregate Year-to-Date  
 Primary General 5000.00  
 Other (specify) v

Transaction ID: SA11A1.4600

SUBTOTAL of Receipts This Page (roll-over) **5300.00**

TOTAL This Period (last page this line number only)

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

Use separate schedule(s) or item category of the Detailed Summary Page	FOR LINE NUMBER: PAGE 8/74				
	(check only one)				
<input checked="" 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"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17	<input type="checkbox"/> 18

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 persons.

NAME OF COMMITTEE (in full)  
21ST CENTURY FREEDOM PAC FEDERAL (FKA ECONOMIC FREEDOM PAC)

**A.** Full Name (Last, First, Middle Initial)  
High Falls Brewing Company, LLC

Date of Receipt  
M O N T H Y  
11 30 2001

Mailing Address  
445 St. Paul Street

City State Zip Code  
Rochester NY 14603

Amount of Each Receipt this Period  
2500.00

FEC ID number of contributing federal political committee.

Name of Employer  
High Falls Brewing Company, LLC

Occupation  
Chairman

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

Transaction ID: SA11A1.4909

**B.** Full Name (Last, First, Middle Initial)  
Tara Hubbert

Date of Receipt  
M O N T H Y  
11 30 2001

Mailing Address  
445 St. Paul Street

City State Zip Code  
Rochester NY 14603

Amount of Each Receipt this Period  
2600.00

FEC ID number of contributing federal political committee.

Name of Employer  
High Falls Brewing Company, LLC

Occupation  
Chairman

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

Transaction ID: SA11A1.4908.0

[MEMO ITEM]

**C.** Full Name (Last, First, Middle Initial)  
Leo Kayser, II

Date of Receipt  
M O N T H Y  
07 24 2001

Mailing Address  
480 Park Avenue Apt. 2F

City State Zip Code  
New York NY 10022

Amount of Each Receipt this Period  
1750.00

FEC ID number of contributing federal political committee.

Name of Employer  
Kayser & Reardon

Occupation  
Partner

Receipt For: Aggregate Year-to-Date \$  
Primary General 1750.00  
Other (specify) \$

Transaction ID: SA11A1.4613

GUSTOTAL of Receipts This Page (optional) ..... ▶ 4250.00

TOTAL This Period (last page (has 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 9/74  
(check only one)  
 11a  11b  11c  12  
 13  14  15  16  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 committee purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in full)  
21ST CENTURY FREEDOM PAC FEDERAL, (FKA ECONOMIC FREEDOM PAC)

**A. Candy Healy** Date of Receipt: 08 / 30 / 2001  
 Mailing Address: Bay Street, City, State NY, Zip Code 11853  
 Amount of Each Receipt this Period: 5000.00  
 FEC ID number of contributing federal political committee:  
 Name of Employer Information Requested: Occupation:  
 Receipt For: Aggregate Year-to-Date \$ 10000.00  
 Primary General Other (specify) \$ Transaction ID: BA11A1.4831

**B. Candy Healy** Date of Receipt: 01 / 30 / 2002  
 Mailing Address: Bay Street, City, State NY, Zip Code 11853  
 Amount of Each Receipt this Period: 5000.00  
 FEC ID number of contributing federal political committee:  
 Name of Employer Information Requested: Occupation:  
 Receipt For: Aggregate Year-to-Date \$ .00  
 Primary General Other (specify) \$ Transaction ID: BA11A1.4829  
 (MEMO ITEM)

**C. Patrick Healy II** Date of Receipt: 08 / 30 / 2001  
 Mailing Address: 1 A Bay Street, City, State NY, Zip Code 11853  
 Amount of Each Receipt this Period: 5000.00  
 FEC ID number of contributing federal political committee:  
 Name of Employer Information Requested: Occupation: Chairman  
 Receipt For: Aggregate Year-to-Date \$ 10000.00  
 Primary General Other (specify) \$ Transaction ID: BA11A1.4832

10000.00  
 SUBTOTAL of Receipts This Page (optional) .....  
 TOTAL This Period (last page this line NUMBER only) .....

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

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

FOR LINE NUMBER: PAGE 10/74  
(check only one)

<input type="checkbox"/>						
11A	11B	11C	11D	11E	11F	11G
12	13	14	15	16	17	18

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 campaign purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)  
21ST CENTURY FREEDOM PAC FEDERAL (FKA ECONOMIC FREEDOM PAC)

**A. Full Name (Last, First, Middle Initial)**  
Patrick G. Meloy III

**Date of Receipt**  
M O N T H Y  
0 1 3 0 2 0 0 2

**Address**  
1 A Bury Street  
City: Sea Harbor NY 11983

**Amount of Each Receipt this Period**  
5000.00

**FEC ID number of contributing federal political committee**

**Name of Employer**  
New York Railway Incorporated  
**Occupation**  
Chairman

**Receipt For:** Primary General Other (specify)  DD

**Transaction ID:** SA11A1.4800

**(MEMO ITEM)**

**B. Full Name (Last, First, Middle Initial)**  
H. Charles Birkel

**Date of Receipt**  
M O N T H Y  
0 7 0 2 2 0 0 1

**Address**  
633 Winsford Road  
City: Reservoir PA 19610

**Amount of Each Receipt this Period**  
2000.00

**FEC ID number of contributing federal political committee**

**Name of Employer**  
Information Requested  
**Occupation**  
Chairman

**Receipt For:** Primary General Other (specify)  2000.00

**Transaction ID:** SA11A1.4801

**C. Full Name (Last, First, Middle Initial)**  
R. J. Rothman

**Date of Receipt**  
M O N T H Y  
0 8 0 1 2 0 0 1

**Address**  
18 Fudgecreek Road  
City: Scarsdale NY 10583

**Amount of Each Receipt this Period**  
1500.00

**FEC ID number of contributing federal political committee**

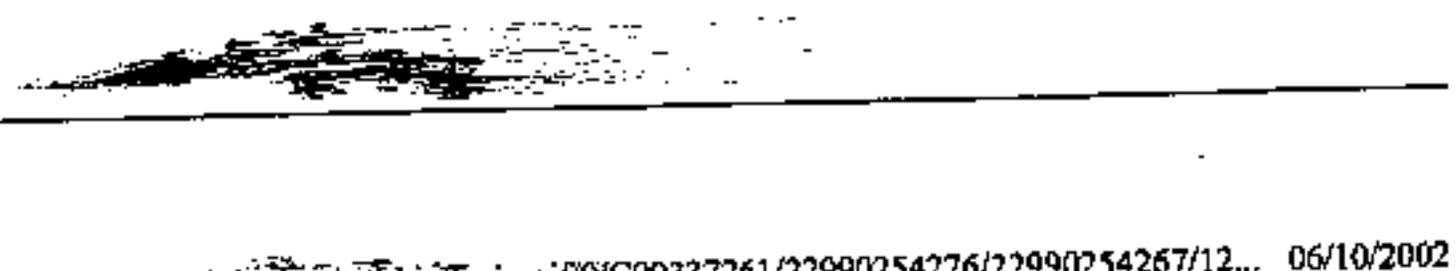
**Name of Employer**  
Wallace, Kugel, Mordant, Edelman & Di  
**Occupation**  
Attorney

**Receipt For:** Primary General Other (specify)  1500.00

**Transaction ID:** SA11A1.4802

**SUBTOTAL of Receipts This Page (top boxes)** 3500.00

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



Form/Schedule: SA11A1 Over Limit Contribution Refund 1/20/02 \$5,000.00  
Transaction ID: SA11A1.4828

Form/Schedule: SA11A1 Over Limit Contribution Refund on 1/20/02 \$5,000.00  
Transaction ID: SA11A1.4828

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

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

FOR LINE NUMBER: PAGE 8 / 82  
(check only one)  
 11a  11b  11c  12  17  
 13  14  15  16

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 (or POC)  
21ST CENTURY FREEDOM PAC FEDERAL (FKA ECONOMIC FREEDOM PAC)

**A.** Full Name (Last, First, Middle Initial)  
Candace Wiley Date of Receipt  
04 10 2001

Mailing Address  
Bry Street  
City State Zip Code  
Sea Harbor NY 11959

FEC ID number of contributing federal political committee: Amount of Each Receipt This Period  
5000.00

Name of Employer Information Requested Occupation  
Receipt For: Aggregate Year-to-Date \$  
Primary General 5000.00  
Other (specify) \$ Transaction ID: SA11A1.4112

**B.** Full Name (Last, First, Middle Initial)  
Patrick E. Wiley II Date of Receipt  
04 10 2001

Mailing Address  
1 A Bry Street  
City State Zip Code  
Sea Harbor NY 11959

FEC ID number of contributing federal political committee: Amount of Each Receipt This Period  
5000.00

Name of Employer Information Requested Occupation  
New York Business Incorporated Chairman  
Receipt For: Aggregate Year-to-Date \$  
Primary General 5000.00  
Other (specify) \$ Transaction ID: SA11A1.4110

**C.** Full Name (Last, First, Middle Initial)  
Mary Jane M. Pico Date of Receipt  
09 19 2001

Mailing Address  
97 10th Street  
City State Zip Code  
Garden City NY 11530-1439

FEC ID number of contributing federal political committee: Amount of Each Receipt This Period  
5000.00

Name of Employer Information Requested Occupation  
Receipt For: Aggregate Year-to-Date \$  
Primary General 5000.00  
Other (specify) \$ Transaction ID: SA11A1.4108

SUBTOTAL of Receipts This Page (add/subtract) 15000.00

TOTAL This Period (add page totals 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 13/74	
(check only one)			
<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 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)  
21ST CENTURY FREEDOM PAC FEDERAL (FKA ECONOMIC FREEDOM PAC)

Full Name (Last, First, Middle Initial) A. Enterprise Rent-A-Car PAC		Date of Receipt 07 24 2001
Mailing Address 155 Pollify Road		Amount of Each Receipt this Period 5000.00
City Hackensack	State Zip Code NJ 07601	
FEC ID number of contributing federal political committee.		Transaction ID: SA11C.4889
Name of Employer	Occupation	
Receipt For: Primary General Other (specify) ▾	Aggregate Year-to-Date 5000.00	

Full Name (Last, First, Middle Initial) B. PFIZER PAC - NYS		Date of Receipt 09 28 2001
Mailing Address 235 42nd Street		Amount of Each Receipt this Period 1750.00
City New York	State Zip Code NY 10017	
FEC ID number of contributing federal political committee.		Transaction ID: SA11C.4893
Name of Employer	Occupation	
Receipt For: Primary General Other (specify) ▾	Aggregate Year-to-Date 1750.00	

Full Name (Last, First, Middle Initial) C. RPAC of New York State		Date of Receipt 07 19 2001
Mailing Address 130 Washington Avenue		Amount of Each Receipt this Period 1750.00
City Albany	State Zip Code NY 12210	
FEC ID number of contributing federal political committee.		Transaction ID: SA11C.4895
Name of Employer	Occupation	
Receipt For: Primary General Other (specify) ▾	Aggregate Year-to-Date 1750.00	

SUBTOTAL of Receipts This Page (optional)	8500.00
TOTAL This Period (last page this line number only)	8500.00

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 statements. The text then moves on to describe the various methods used to collect and analyze data, highlighting the need for consistency and objectivity in the process. The author also addresses the challenges of data collection and analysis, such as missing data and measurement errors, and offers practical solutions to these problems. Finally, the document concludes with a summary of the key findings and a call to action for further research in this area.