



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Scott E. Rozzell, Treasurer
Baker & Botts Bluebonnet Fund
3000 One Shell Plaza
Houston, TX 77002

OCT 21 1998

Identification Number: C00077552

Reference: February Monthly (1/1/97-1/31/97), March Monthly (2/1/97-2/28/97), April Monthly (3/1/97-3/31/97), May Monthly (4/1/97-4/30/97), June Monthly (5/1/97-5/31/97), July Monthly (6/1/97-6/30/97), October Monthly (9/1/97-9/30/97), November Monthly (10/1/97-10/31/97), December Monthly (11/1/97-11/30/97), February Monthly (1/1/98-1/31/98), March Monthly (2/1/98-2/28/98), April Monthly (3/1/98-3/31/98), June Monthly (5/1/98-5/30/98), and July Monthly (6/1/98-6/30/98) Reports

Dear Mr. Rozzell:

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:

-Your report discloses no 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 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 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,

Richard Wagner

Richard Wagner

Reports Analyst

Reports Analysis Division