FEDERAL ELECTION COMMISSION RQ-3
WASHINGTON, D.C. 20463

June 19, 1997

Alan Kramer, Treasurer
Wisconsin Right to Life Political
Action Committee
10625 West North Avenue
Milwaukee, WI 53226

Identification Number: C00173278

Reference: 12 Day Pre-General (10/1/96-10/16/96), 30 Day Post-General (dated 12/2/96) and Year End (11/25/96-12/31/96) Reports

Dear Mr. Kramer:

This letter is to inform you that as of June 18, 1997, the Commission has not received your response to our requests for additional information dated May 28, 1997. 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 Neil Evans on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAY 28 1997

Alan Kramer, Treasurer
Wisconsin Right to Life
Political Action Committee
10625 W. North Avenue
Milwaukee, WI 53226

Identification Number: C00173278

Reference: 30 Day Post-General Report dated 12/2/96

Dear Mr. Kramer:

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 D of your report has failed to include certain information. Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and end of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report by providing the full name and address of each creditor and purpose of each debt. 11 CFR §104.11

-Please amend Schedule D to revise your estimated debt, to the correct amount of debt owed to vendors, once a correct figure is known.

-Please amend your Schedule E to include memo entries to show the allocation of independent expenditures when the communication concerns more than one federal candidate. (see enclosure)

-2 U.S.C. §434(b)(3) requires itemization of contributions from individuals and persons other than political committees, where the aggregate total from the contributor exceeds $200 in a calendar year. In addition, 11 CFR §104.3(a)(2)(i)(B) requires a committee to report the total amount of

unitemized contributions (see Line 11(a)(ii) of the Detailed Summary Page). If a committee wishes to disclose contributions regardless of the amount contributed, the committee must separate (on separate receipt schedules) those contributors requiring itemization from those who are not required to be itemized. 11 CFR §104.3(a)(4)(i) For future filings, please submit your reports in this order.

-Please provide the coverage dates of your report on Line 5 of the Summary Page.

-Be advised that you have used an incorrect committee identification number on the Summary Page of your report(s). Please file all future reports and correspondence using your correct identification number, C00173278, to avoid potential errors in entering your reports onto the public record.

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) 219-3580.

Sincerely,

Neil A. Evans
Reports Analyst
Reports Analysis Division

Unlike other operating expenditures, taxes on an SSF's earnings are not payable by the *connected organization*. AO 1977–19.

7. Independent Expenditures

Schedule E

Itemize any *independent expenditure* which, by itself or when added to other independent expenditures made to the same payee during the same calendar year, exceeds $200. Independent expenditures are itemized on Schedule E. A subtotal for itemized independent expenditures is entered on Line (a).

Independent expenditures of $200 or less do not need to be itemized, though the committee must report the subtotal of those expenditures on Line (b). 104.3(b)(3)(vii)(C) and 104.4(a).

Enter the total of itemized and unitemized independent expenditures on Line (c) of Schedule E and on Line 24 of the Detailed Summary Page.

Certification

The treasurer must sign the statement on Schedule E which certifies, under penalty of perjury, that the expenditure meets the standards of "independence" (see Chapter 4 for more information). The form must be notarized. 104.3(b)(3)(vii)(B).

Last-Minute Independent Expenditure Notices

The SSF must file a special notice when it makes an independent expenditure of more than $1,000 (by itself or aggregated with other independent expenditures made to the same payee) after the 20th day but more than 24 hours before the day of an election. The notice must be received by the filing office within 24 hours after the expenditure is made (see "Federal Filing" on page 28). The notice must include all the information required on Schedule E. (This reporting requirement applies to a written contract of more than $1,000 which the committee has not yet paid.) 104.4(b) and 104.5(g).

INDEPENDENT EXPENDITURES

SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

Page 1 of 2 pages

(See Previous Side for Instructions)

Name of Committee (in Full): National Organization PAC — C00000001

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date-Period, Year, Month	Amount	Name of Federal Committee Supported or Opposed by the Independent Expenditure
New City Post 101 21st Street City, State ZIP	Newspaper ad	8/22/94	$2,636.59	Joseph Mitchum Senate, State ☐ Support ☒ Opposed
South City Post 1254 Broad Street City, State ZIP	Newspaper ad	8/23/94	$3,661.19	Joseph Mitchum Senate, State ☐ Support ☒ Opposed
Roberts Communications 1515 15th Street City, State ZIP	Billboards	8/10/94	$10,556.00	See allocation below ☐ Support ☐ Opposed
			$5,277.50 MEMO	William Frankel Senate, State ☒ Support ☐ Opposed
			$5,277.50 MEMO	Louis Stather House, State ☒ Support ☐ Opposed
				☐ Support ☐ Opposed

(a) SUBTOTAL of Itemized Independent Expenditures $18,751.88

(b) SUBTOTAL of Unitemized Independent Expenditures ..... $

(c) TOTAL Independent Expenditures ..... $ 18,751.88

[illegible]

Subscribed and sworn to before me this 10th day of October, 94

My Commission Expires 2/12/98

Brenda Hampkrey
NOTARY PUBLIC

Tony Johnson — 10/10/94
Signature — Date

Use memo entries to show the allocation of an independent expenditure when the communication concerns more than one federal candidate.

The SSF must report the last-minute expenditure a second time on Schedule E, filed with its next regular report. 104.4(a).

8. Reporting Loans

Continuously itemize all loans received and made by the SSF until they are repaid. All repayments made or received on a loan must also be itemized. 104.3(a)(4)(iv); 104.3(b)(3)(iii) and (vi); 104.3(d); 104.11. Procedures for reporting loans and loan repayments are explained below.

Reminder: Loans are considered contributions to the extent of the outstanding balance of the loan. 100.7(a)(1)(i). Loans from *banks*, however, are not considered contributions if made in the ordinary course of business. Endorsements and guarantees of bank loans, however, do count as contributions. 100.7(a)(1)(i) and (b)(11).