



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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Barbara W. Bonfiglio, Assistant Treasurer
American Success Political Action
Committee
1155 21st Street, N.W., Suite 300
Washington, DC 20036

APR 4 2001

Identification Number: C00336644

Reference: 12 Day Pre-General Report (10/1/00-10/18/00)

Dear Ms. Bonfiglio:

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:

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the purpose for the joint expenditure to Silverado CC and Resort. Note that the unique identifying code for an event is not considered an adequate description of purpose. Please amend your report to include this missing information.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the total EVENT YEAR-TO-DATE amount for a payment(s) to Silverado CC and Resort. Please amend your report to include the missing EVENT YEAR-TO-DATE total(s).

-On Schedule H3 supporting Line 18 of the Detailed Summary Page, you have failed to include the date of receipt and total amount transferred for the \$13,013.24 transfer-in from the American Success PAC Non-Federal Account. Please amend your report to include this date. 11 CFR §104.10

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) B of your report to clarify the following description(s): "October consulting fees". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

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-Your committee reports disbursements on Schedule B and Schedule H4 which appear to be identical. Please note that any activity which is financed entirely by the federal account should be reported on Schedule B supporting Line 21(b), not Schedule H4 supporting Line 21(a)(i). Likewise, any allocable expenses which are paid jointly should only be disclosed on Schedule H4 supporting Line 21(a)(i), not Schedule B supporting Line 21(b). Duplication in reporting disbursements may cause inflated disbursement totals. Please amend your report to clarify your disbursements. 11 CFR §106.5

-Schedule H4 discloses a disbursement(s) which is categorized as a fundraising expense(s); however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the direct costs of each fundraising event in which the committee collects both federal and non-federal funds. The costs are allocated according to the funds received ratio and reported on Schedule H2. 11 CFR §§106.5(f) and 106.6(d). Please file a Schedule H2 to disclose the ratio for the fundraising event(s).

-On Schedule B supporting Lines 21(a)(i) and 21(a)(ii), you disclose a payment to Silverado CC and Resort made on 10/10/00; however, on Schedule H4, you disclose the same payment as being made on 10/23/00. Please amend your report to clarify which date the payment was made on. If it was the latter, the payment should be disclosed on the 30 Day Post General Report, and both reports should be amended to reflect the change.

-On Schedule A supporting Line 18 you disclose transfers from your non-federal account which appear to be identical to the transfers disclosed on Schedule H3. Be advised that transfers from your non-federal account should only be disclosed on Schedule H3 supporting Line 18. Please amend your report to clarify this discrepancy.

-Schedule H3 of your report discloses transfers received from your non-federal account which occur outside the permissible transfer period. Please be advised that transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of these transfers-in from the non-federal account.

The Commission recommends that you immediately transfer the total excessive amount received by your federal account outside the 70-day time

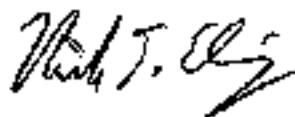
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period back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

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 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Nicholas T. Ebinger
Reports Analyst
Reports Analysis Division

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