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January 7, 2003

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PHILIP C. OLSSON, THE DISTRICT OF COLUMBIA
 IS LICENSED TO PRACTICE AND THE FIRM HAS
 REPORT FILED IN THE DISTRICT OF COLUMBIA.

BY HAND-DELIVERY

Alissa V. Sagri
 Campaign Finance Analyst
 Reports and Analysis Division
 Federal Election Commission
 999 E Street, N.W.
 Washington, DC 20463

**Re: Schwan's Sales Enterprises, Inc. Political Action Committee (Schwan's PAC)
FEC Identification Number C00360362**

Dear Ms. Sagri:

This letter responds to your letters of December 11, 2002, regarding certain reports filed by Schwan's Sales Enterprises, Inc. Political Action Committee (Schwan's PAC)¹. Each of your letters is addressed in a separate section of this correspondence.

Year End (7/1/01-12/31/01) and July Quarterly (4/1/02-6/30/02) Reports

Your letter notes that Schwan's PAC may have made contributions that exceed the limits for a non-multicandidate PAC (*i.e.*, contributed more than \$1,000.00 per election cycle)². Attached to your letter are copies of the following Schwan's PAC reports: 2000 Post-Election, 2001 Mid-year, 2001 July Quarterly, and 2001 Year End. The highlighted sections of these reports pertain to

¹ A second set of letters was sent by the FEC on January 2, 2003. These letters reference a December 13, 2002, response submitted by Schwan's PAC in the form of amended reports. These reports were not a response to the original FEC correspondence. Rather, they were filed voluntarily to correct errors discovered independently by Schwan's PAC, and were filed prior to receipt of the December 11, 2002, FEC letters.

² At the time these contributions were made Schwan's PAC did not qualify for multicandidate status. Schwan's PAC qualified for multicandidate status in May 2002.

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contributions to election committees of then-Congressman John Thune (R-SD), Congressman Mark Kennedy (R-MN), and Senate Candidate John Thune (R-SD).

For the contributions to John Thune, Schwan's PAC did not exceed the limits for non-multicandidate committees. The contribution itemized on the 2000 Post-Election report was for Mr. Thune's 2000 House campaign. The contribution listed on the 2002 July Quarterly report was for Mr. Thune's 2002 Senate campaign. These were separate elections, and, accordingly, subject to separate contribution limits.

For the contributions to Congressman Mark Kennedy's campaign committee, Schwan's PAC has requested a refund of the contribution made on December 7, 2001. A copy of this request is enclosed for your reference. The refund will be appropriately noted on the FEC report covering the period in which it is received.

Amended April Quarterly Report (1/1/02-3/31/02), Dated 4/18/02

Your letter indicates that this report fails to provide complete identification information for contributors to Schwan's PAC. Please note that a subsequent amended report was filed on December 13, 2002, that provides most of the missing information. However, that amended report does not list the occupation of some contributors. Accordingly, another amended report will be filed to correct this oversight.

October Quarterly Report (7/1/02-9/30/02)

This letter notes four separate concerns with the 2002 October Quarterly Report. Two were corrected in an amended report filed after the date of your letter (but prior to our receipt), and the remaining issues will be corrected by filing a second amended report. In summary:

- Potential inaccurate figures for several lines under Column B of the Summary and Detailed Summary pages were noted. These figures were corrected in an amended report filed on December 13, 2002.
- There was a discrepancy between the beginning cash balance for this report and the ending balance on the previous report (July Quarterly Report). This was corrected in amended reports for both of these quarters that were filed on December 13, 2002.
- The report fails to provide complete identification information for contributors to Schwan's PAC. An amended report will be filed to correct this oversight.

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- The report was filed using a commonly recognized name (Schwan's Political Action Committee) rather than the Committee's full name. An amended report will be filed to correct this oversight.

Other Reports

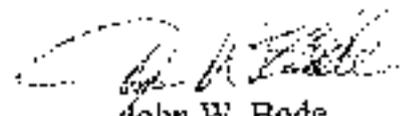
In the course of our review of the Schwan's PAC reports, several additional inadvertent errors were discovered in reports not mentioned in your letters. Accordingly, amendments will also be filed for the following reports:

- 2001 Year End (7/1/01-12/31/01);
- 2002 July Quarterly (4/1/02-6/30/02);
- 2002 Pre-General (10/1/02-10/16/02); and
- 2002 Post-General (10/17/02-11/25/02).

Conclusion

Schwan's PAC is committed to full compliance with federal election laws, and we believe that the amended reports will fully correct the inadvertent errors in previous reports. Please let me know if you have any questions.

Sincerely,



John W. Bode
Assistant Treasurer
Schwan's PAC

JWB:lss
Enclosure

Federal Election Commission

ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

<input checked="" type="checkbox"/> Hand Delivered	Date of Receipt <i>1-7-03</i>
<input type="checkbox"/> First Class Mail	POSTMARKED
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED (R/C)
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked and/or Date of Receipt
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