



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

January 21, 2005

Buck Schilling, Treasurer
Republican Party Of Wisconsin
148 E. Johnson Street
P.O. Box 31
Madison, WI 53703

Response Due Date:
February 22, 2005

Identification Number: C00074450

Reference: 30 Day Post-General Report (10/14/04-11/22/04)

Dear Mr. Schilling:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule A supporting Line(s) 12 of your report discloses a receipt(s) from a candidate committee(s) (see attached) which requires further clarification. For example, if this activity represents a transfer of funds, please indicate "transfer" on Schedule A supporting Line 11(e) of your report. If this activity represents a reimbursement for services provided to this committee, please indicate this on Schedule A supporting Line 15 of your report. Please amend your report to clarify the type of activity this receipt(s) represents.

-Schedule B supporting Line 21(b) of your report discloses a payment(s) totaling \$531,290.22 for "Absentee Mail," "get out the vote mail," "get out the vote mailing," "Printing," "Printing charges" and "Telemarketing Prospecting Calls". Expenditures and disbursements for public communications (as defined under 11 CFR §100.26) that refer to a clearly identified candidate for Federal office and that promote, support, attack or oppose any candidate for Federal office, meet the definition of Federal Election Activity under 11 CFR §100.24 and should be disclosed on Schedule B for Line 30(b) along with the identity of the candidate(s).

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Further, public communications that meet the definition of Federal Election Activity and that also contain express advocacy as defined under 11 CFR §100.22, but do not meet the conditions of exempt activity, would constitute an in-kind contribution, an independent expenditure or a coordinated party expenditure and should be properly disclosed on a Schedule B, E or F supporting Lines 23, 24 or 25, as appropriate, rather than on Schedule B for Line 30(b). Please amend your report to properly disclose this activity or provide clarifying information.

-Please clarify all expenditures made for "Room Rental" on Schedule(s) B. If a portion or all of those expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E or F supporting Lines 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Schedule A supporting Line 12 discloses a transfer(s)-in from the RNC. Schedule B supporting Line 21(b) reflects payments for "Shirts," "Shirts & Rulers," "Shirts and bumper stickers," "Stickers," "T-shirts," "Wires," "Yard Signs," and "Yard sign wires." Please be advised that a state or local party committee may pay for campaign materials (such as pins, posters, bumper stickers and yard signs) that are distributed by volunteers in connection with activity on behalf of the party's nominees in a general election. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used, including distribution by direct mail (mailings by a commercial vendor or from commercial lists); all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR §§100.87 and 100.147 and to the Campaign Guide for Party Committees.

Please clarify the nature of the transfer(s)-in and subsequent payments for the aforementioned disbursement(s). If the activity disclosed on your report does not meet the definition of "exempt" activity as described above and if any portion of the expenditures were made on behalf of specifically identified candidates, that amount must be disclosed on Schedule B, E or F supporting Line 23, 24 or 25 of the Detailed Summary Page as appropriate.

-Schedule B supporting Line 21(b) of your report discloses a payment(s) for "List Development" "Reimbursement for List Development" and "get out the vote mail" which appears to be disclosed on the wrong line of the Detailed Summary Page. Please be advised that Voter Identification,

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Generic Campaign and Get-out-the-vote activity conducted between 1/6/04 and 11/2/04 in connection with an election in which one or more candidates for Federal office appear on the ballot is considered to be Federal Election Activity. 11 CFR §100.24 Please amend your report to properly disclose this activity on Line 30(b) or provide clarification regarding this activity.

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. 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.

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 should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1135.

Sincerely,



Manteen Bemitz

Senior Campaign Finance Analyst
Reports Analysis Division

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Contributor Name	Date	Amount	Report
MICHELS FOR U S SENATE	11/08/04	\$15,000.00	30 Day Post General
MICHELS FOR U S SENATE	11/17/04	\$167,000.00	30 Day Post General
GREEN FOR CONGRESS	10/25/04	\$15,000.00	30 Day Post General
GREEN FOR CONGRESS	11/17/04	\$15,500.00	30 Day Post General
RYAN FOR CONGRESS	11/01/04	\$15,000.00	30 Day Post General

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