



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

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

APR 11 2001

Identification Number: C00336644

Reference: 30 Day Post-General Report (10/19/00-11/27/00)

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:

-Schedule H3 of your report discloses a transfer(s)-in from a non-federal account(s) for NAPA Valley Fundraiser which appears to exceed the permissible amount(s) indicated by your allocation ratio for this event. Please be advised that transfers for shared activity must not exceed the non-federal share of the joint disbursements and that these transfers must be made within a 70-day time period: no more than 10 days before or 60 days after 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 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.

-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

AMERICAN SUCCESS POLITICAL ACTION COMMITTEE  
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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).

-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): "November consulting fees and expenses". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the purpose for the joint expenditure to Keith Rosenthal Photography. 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.

-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

-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 B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and

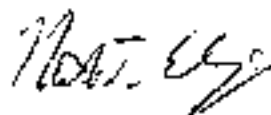
request a refund of the amount in excess of \$5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) 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

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

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FOR LINE NUMBER 23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such committee.

**NAME OF COMMITTEE (in Full)**

American Success Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement 2000 contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	Date (month, day, year)	Amount of Each Disbursement This Period
National Republican Congressional Committee 320 First St., SE Washington, DC 20003	Richard "Doc" Hastings, U.S. HOUSE 4th WA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	10/24/00	11,000.00 <b>NTE</b>
Todd Platts for Congress 625 Olmstead Way York, PA 17404	Todd R. Platts, U.S. HOUSE 19th PA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	10/24/00	1,000.00
Claude Hutchinson for Congress 3189 Danville Road Alamo, CA 94507	Claude Hutchinson, U.S. HOUSE 10th CA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	11/01/00	4,000.00
Michael Stoker for Congress 2154 Fallen Leaf Dr Santa Maria, CA 93455	Michael Stoker, U.S. HOUSE 22nd CA Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Primary Debt Reduction	11/01/00	4,000.00
Robert Simmons for Congress 12 Roosevelt Ave Box 4 Mystic, CT 06355	Robert Simmons, U.S. HOUSE 2nd CT Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	11/02/00	3,000.00
Elia Pirozzi For Congress 6221 Mount Cook Court Alta Loma, CA 91737	Elia Pirozzi, U.S. HOUSE 42nd CA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	11/02/00	2,000.00
K. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

<b>SUBTOTAL</b> of Disbursements This Page (optional) .....	26,500.00
<b>TOTAL</b> This Period (last page this line number only) .....	87,500.00

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American Success Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Matson For Congress 855 Troper Road #108-126 Olympia, WA 98512-8108	Trent Matson, U.S. HOUSE 3rd WA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/27/00	1,000.00
Doc Hastings for Congress 8515 W. Clearwater, Suite 220 Pasco, WA 99302	Richard "Doc" Hastings, U.S. HOUSE 4th WA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/27/00	2,500.00
Friends of Nethercutt for Congress 1 South Washington Spokane, WA 99201	George R. Nethercutt, U.S. HOUSE 5th WA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/27/00	5,000.00
John Sharpless for Congress PO Box 280050 Madison, WI 53726	John B. Sharpless, U.S. HOUSE 2nd WI Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/27/00	2,500.00
Shelley Moore Capito for Congress PO Box 11519 Charleston, WV 25339	Shelley Moore Capito, U.S. HOUSE 2nd WV Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/27/00	2,000.00
Republican National Committee 310 First Street SE Washington, DC 20003	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/27/00	1,000.00
Anne Northup for Congress 4008 Dutchmans Lane Louisville, KY 40207	Anne M. Northup, U.S. HOUSE 3rd KY Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/27/00	2,500.00
Adam Putnam for Congress PO Box 2426 Bartow, FL 33831	Adam Putnam, U.S. HOUSE 12th FL Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/28/00	2,500.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

**NOTE**

<b>SUBTOTAL</b> of Disbursements This Page (optional) .....	19,000.00
<b>TOTAL</b> This Period (last page this line number only) .....	126,000.00

## SCHEDULE B

## ITEMIZED DISBURSEMENTS

Use separate schedule(s)  
for each category of the  
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## NAME OF COMMITTEE (in Full)

American Business Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Walden for Congress P.O. Box 380 Hood River, OR 97031	Gregory Paul Walden, U.S. HOUSE 2nd OR Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	06/15/00	2,500.00
Walsh For Congress Committee 400 Broadview Dr Syracuse, NY 13215	Jamie T. Walsh, U.S. HOUSE 25th NY Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	06/15/00	1,000.00
WATTS FOR CONGRESS '98 1258 N. Interstate Dr., West Norman, OK 73072	J.G. Watts, U.S. HOUSE 4th OK Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	05/15/00	1,000.00
Weldon For Congress Comm.; The 49 Weatherstone Road Aston, PA 19014	Curt Weldon, U.S. HOUSE 7th PA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	06/15/00	1,000.00
Weller for Congress PO Box 15283 Washington, DC 20003	Jerry Weller, U.S. HOUSE 11th IL Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	06/15/00	1,000.00
Whitfield For Congress Comm. 106 Akumai Avenue Hopkinsville, KY 42240	Edward Whitfield, U.S. HOUSE 1st KY Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	06/15/00	2,500.00
Friends of Roger Wicker 1013 N. Gleaner St. Tupelo, MS 38801	Roger Wicker, U.S. HOUSE 1st MS Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	06/15/00	1,000.00
Doc Hastings for Congress 6615 W. Clearwater, Suite 220 Pasco, WA 99302	Richard "Doc" Hastings, U.S. HOUSE 4th WA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 1992	06/15/00	1,000.00
Hobbs for Congress 415 Bronco Circle Shady Groves, TX 76206	David Hobbs, U.S. HOUSE 12th TX Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 1992	06/15/00	1,000.00

SUBTOTAL of Disbursements This Page (optional) .....

12,000.00

TOTAL This Period (last page this line number only) .....

## SCHEDULE B

## ITEMIZED DISBURSEMENTS

Use separate schedule(s)  
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## NAME OF COMMITTEE (In Full)

American Success Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
GREENWOOD FOR CONGRESS 785 RIVER ROAD ERWINNA, PA 18820	James C. Greenwood, U.S. HOUSE 8th PA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	05/13/00	1,000.00
B. Full Name, Mailing Address and ZIP Code Gutknecht For U S Congress Comm. 3421 - 16th Avenue NW Rochester, MN 55901	Gil Gutknecht, U.S. HOUSE 1st MN Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	05/13/00	1,000.00
C. Full Name, Mailing Address and ZIP Code Jim Hansen Committee P.O. Box 634 Farmington, UT 84025	James V. Hansen, U.S. HOUSE 1st UT Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	05/13/00	1,000.00
D. Full Name, Mailing Address and ZIP Code Hastart For Congress Committee 7630a Rt 34 P O Box 386 Yorkville, IL 60560	J. Dennis Hastart, U.S. HOUSE 14th IL Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	05/13/00	1,000.00
E. Full Name, Mailing Address and ZIP Code Doc Hastings for Congress 6615 W. Clearwater, Suite 220 Pasco, WA 99302	Richard "Doc" Hastings, U.S. HOUSE 8th WA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	05/13/00	1,000.00
F. Full Name, Mailing Address and ZIP Code Wally Herger for Congress 3881 Boneter Way, Ste. G Chico, CA 95926	Wally Herger, U.S. HOUSE 2nd CA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	05/13/00	1,000.00
G. Full Name, Mailing Address and ZIP Code Van Hollen For Congress Po Box 1136 Spring City, TN 37381	Van Hollen, U.S. HOUSE 4th TN Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	05/13/00	1,000.00
H. Full Name, Mailing Address and ZIP Code Hobson For Congress Committee 462 Longford Close East Springfield, OH 45503	David L. Hobson, U.S. HOUSE 7th OH Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	05/13/00	1,000.00
I. Full Name, Mailing Address and ZIP Code Friends for Houghton 33 E. Third Street Corning, NY 14830	Arno Houghton, U.S. HOUSE 31st NY Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	05/13/00	1,000.00

SUBTOTAL of Disbursements This Page (optional)

9,000.00

TOTAL This Period (last page this line number only)

