

AMERICAN SUCCESS PAGE (MARINE) Honorary Chairman - David Dreier

Jan 20 5 or PH '99

January 19, 1999

Andrew Dodson Reports Analysis Division Federal Election Commission 999 E Street, NW Washington, DC 20463

> RE: American Success PAC Identification Number: C00336644

Dear Mr. Dodson:

This letter is in response to the FEC notice dated January 4, 1999 which requests disclosure of payments for administrative costs for the American Success PAC.

American Success PAC is a small political action committee which pays no salaries and incurs limited expenses during the election cycle. The expenses are primarily consulting and fundraising, and have been reported as such. American Success PAC does not have an office, and thus pays no rent or utilities.

We apologize for any inconvenience this may have caused and urge you to call if you have any questions.

Sincerely,

Mark Hambrick

PAC Director

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

COMMISSION THE HOLD

Jan 20 5 on 191 199

Anthony J. Roda, Treasurer
American Success Political Action Committee
1155 21st Street, NW, Suite 300
Washington, DC 20036

.IAN A 1999

Identification Number:

C00336644

Reference:

October Quarterly (7/1/98-9/30/98) and 12 Day Pre-General (10/1/98-

10/14/98) Reports

Dear Mr. Roda:

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:

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed <u>during</u> each two <u>vear election cycle</u> beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

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) 694-1130.

Sincerely,

Andrew J. Dodson

Senior Reports Analyst

Reports Analysis Division

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Federal Election Commission

ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

	Date of Receipt
Hand Delivered	1-20=99
First Class Mail	POSTMARKED
Registered/Certified Mail	POSTMARKED
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Received from the House office of Records and Registration	Date of Receipt
Received from the Senate Office of Public Records	Date of Receipt
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PREPARER	DATE PREPARED