FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAY 28 1997

Alan Kramer, Treasurer
Wisconsin Right to Life
Political Action Committee
10625 W North Avenue
Milwaukee, WI 53226

Identification Number: C00173278

Reference: Year End Report (11/25/96-12/31/96)

Dear Mr. Kramer:

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 D of your report has failed to include certain information. Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and end of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report by providing the full name and address of each creditor and purpose of each debt. 11 CFR §104.11

-Please amend Schedule D to revise your estimated debt, to the correct amount of debt owed to vendors, once a correct figure is known.

-Please amend your Schedule E to include memo entries to show the allocation of independent expenditures when the communication concerns more than one federal candidate. (see enclosure)

-The independent expenditure schedule (Schedule E) should disclose the following information: the name and mailing address of the payee, purpose of the expenditure, date of payment, amount of payment, the name and office sought of the federal candidate supported or opposed, signature of the

treasurer, and notarized certification of the information provided. Please amend Schedule E by providing the name and office sought of the federal candidate and whether the expenditure was in support or opposition of the candidate. 11 CFR §104.3(b)(3)(vii)

-For your information, each category on the Detailed Summary Page for which your committee discloses activity must have a separate schedule. Please note this for future filings.

-Be advised that you have used an incorrect committee identification number on the Summary Page of your report(s). Please file all future reports and correspondence using your correct identification number, C00173278, to avoid potential errors in entering your reports onto the public record.

-2 U.S.C. §434(b)(3) requires itemization of contributions from individuals and persons other than political committees, where the aggregate total from the contributor exceeds $200 in a calendar year. In addition, 11 CFR §104.3(a)(2)(i)(B) requires a committee to report the total amount of unitemized contributions (see Line 11(a)(ii) of the Detailed Summary Page). If a committee wishes to disclose contributions regardless of the amount contributed, the committee must separate (on separate receipt schedules) those contributors requiring itemization from those who are not required to be itemized. 11 CFR §104.3(a)(4)(i) For future filings, please submit your reports in this order.

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) 219-3580.

Sincerely,

Neil A. Evans
Reports Analyst
Reports Analysis Division

Unlike other operating expenditures, taxes on an SSF's earnings are not payable by the *connected organization*. AO 1977-19.

7. Independent Expenditures

Schedule E

Itemize any *independent expenditure* which, by itself or when added to other independent expenditures made to the same payee during the same calendar year, exceeds $200. Independent expenditures are itemized on Schedule E. A subtotal for itemized independent expenditures is entered on Line (a).

Independent expenditures of $200 or less do not need to be itemized, though the committee must report the subtotal of those expenditures on Line (b). 104.3(b)(3)(vii)(C) and 104.4(a).

Enter the total of itemized and unitemized independent expenditures on Line (c) of Schedule E and on Line 24 of the Detailed Summary Page.

Certification

The treasurer must sign the statement on Schedule E which certifies, under penalty of perjury, that the expenditure meets the standards of "independence" (see Chapter 4 for more information). The form must be notarized. 104.3(b)(3)(vii)(B).

Last-Minute Independent Expenditure Notices

The SSF must file a special notice when it makes an independent expenditure of more than $1,000 (by itself or aggregated with other independent expenditures made to the same payee) after the 20th day but more than 24 hours before the day of an election. The notice must be received by the filing office within 24 hours after the expenditure is made (see "Federal Filing" on page 28). The notice must include all the information required on Schedule E. (This reporting requirement applies to a written contract of more than $1,000 which the committee has not yet paid.) 104.4(b) and 104.5(g).

INDEPENDENT EXPENDITURES

SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

Page 1 of 1 Pages

(Use Separate Schedule for Each Candidate)

Name of Committee (in Full)
National Organization PAC

C00000001

Full Name, Mailing Address & Occupation of Each Payee	Purpose of Expenditure	Date (Month, Day, Year)	Amount	Name of Federal Candidate Supported or Opposed by the Expenditure & Office Sought
New City Post 101 21st Street City, State ZIP	Newspaper ad	8/22/94	$2,638.69	Joseph Mitchum Senate, State ☐ Support ☒ Oppose
South City Post 1234 Broad Street City, State ZIP	Newspaper ad	8/23/94	$5,661.19	Joseph Mitchum Senate, State ☐ Support ☒ Oppose
Roberts Communications 1515 16th Street City, State ZIP	Billboards	8/10/94	$10,655.00	See allocation below ☐ Support ☐ Oppose
			$5,277.50 MEMO	William Frankel Senate, State ☒ Support ☐ Oppose
			$5,277.50 MEMO	Louis Stather House, State ☒ Support ☐ Oppose
				☐ Support ☐ Oppose
(a) SUBTOTAL of Itemized Independent Expenditures			$18,751.88	
(b) SUBTOTAL of Unitemized Independent Expenditures				
(c) TOTAL Independent Expenditures				$ 18,751.88

Under penalty of perjury I verify that the independent expenditures reported under this schedule are made independently of any candidate, candidate's agent, or any agent or employee of any candidate, or any person acting in cooperation or consultation with any candidate, or any agent or employee of any such person, and are not made to reimburse any person for a contribution or expenditure made for the benefit of any candidate, or any person acting in cooperation or consultation with any candidate, or any agent or employee of any such person, or any political party.

Tracy Johnson 10/10/94
Signature Date

Subscribed and sworn to before me this 10th day of October, 94

My Commission expires 2/12/96

Brenda Humphreys
Notary Public

Use memo entries to show the allocation of an independent expenditure when the communication concerns more than one federal candidate.

The SSF must report the last-minute expenditure a second time on Schedule E, filed with its next regular report. 104.4(a).

8. Reporting Loans

Continuously itemize all loans received and made by the SSF until they are repaid. All repayments made or received on a loan must also be itemized. 104.3(a)(4)(iv); 104.3(b)(3)(iii) and (vi); 104.3(d); 104.11. Procedures for reporting loans and loan repayments are explained below.

Reminder: Loans are considered contributions to the extent of the outstanding balance of the loan. 100.7(a)(1)(i). Loans from banks, however, are not considered contributions if made in the ordinary course of business. Endorsements and guarantees of bank loans, however, do count as contributions. 100.7(a)(1)(i) and (b)(11).