



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

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

Identification Number: C00336644

JAN 23 2001

Reference: October Quarterly Report (7/1/00-9/30/00)

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 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 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).

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the purpose for the joint expenditure to Silverado Country Club and Resort. 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.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule H4 of your report to clarify the following description(s): overnight. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

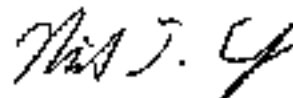
-Your committee reports disbursements on Schedule B and Schedule H4 which appear to be identical. Please note that any activity which is financed entirely by the federal account should be reported on Schedule B supporting Line 21(b), not Schedule H4 supporting Line 21(a)(i). Likewise, any allocable expenses 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 supporting Line 23 of your report discloses a contribution to a federal candidate for "Debt Retirement" (pertinent portion attached). Please provide the election year to which this contribution should be attributed.

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 PagePAGE 1 OF 5
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

NR

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Friends Of Phil 10624 W 61st Street Shawnee, KS 66203	Phil Kline, U.S. HOUSE 3rd KS Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Primary Debt Reduction	08/14/00	5,000.00
B. Full Name, Mailing Address and ZIP Code Sam Graves for Congress 110 South 10th Street Tarkio, MO 64491	Samuel B. Graves, U.S. HOUSE 6th MO Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	08/30/00	5,000.00
C. Full Name, Mailing Address and ZIP Code John Koster For Congress Po Box 3595 Arlington, WA 98223	John Koster, U.S. HOUSE 2nd WA Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/14/00	2,000.00
D. Full Name, Mailing Address and ZIP Code Matson For Congress 855 Troper Road #10B-128 Olympia, WA 98512-8108	Trent Matson, U.S. HOUSE 3rd WA Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/14/00	1,500.00
E. Full Name, Mailing Address and ZIP Code Chris Vance For Congress 909 Pike St NW Auburn, WA 98001	Christopher Vance, U.S. HOUSE 9th WA Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/14/00	1,500.00
F. Full Name, Mailing Address and ZIP Code Bob Franks For US Senate Inc 20 Springholm Drive Berkeley Heights, NJ 07922	Robert Franks, U.S. SENATE NJ Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	08/20/00	1,000.00
G. Full Name, Mailing Address and ZIP Code Jeff Flake for Congress 4222 East McLellan Road #19 Mesa, AZ 85205	Jeffrey Lane Flake, U.S. HOUSE 1st AZ Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/27/00	1,000.00
H. Full Name, Mailing Address and ZIP Code Rich Rodriguez for Congress PO Box 1321 Hanford, CA 93232	Rich Rodriguez, U.S. HOUSE 20th CA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/27/00	4,000.00
I. Full Name, Mailing Address and ZIP Code 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 checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/27/00	1,000.00

22,000.00

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

