

Don Grothe

Rural Route 1 Box 64B
Hancock, Wisconsin 54943

Telephone 715-249-5218

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FEDERAL ELECTION
COMMISSION MAIL ROOM

JAN 5 11 37 AM '98


Andrea Wilkens
Federal Election Commission
Washington, DC 20463

December 30, 1997

Dear Andrea Wilkens,

Enclosed is a copy of a letter sent to Mr. Andrew Dodson pertaining to the same issues addressed in your letter. If you have any questions or if this is not an adequate explanation please contact me.

Sincerely,



Don Grothe

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Rural Route 1 Box 64B
Hancock, Wisconsin 54943

Telephone 715-249-5218

Andrew Dodson
Federal Election Commission
Washington, DC 20463

September 10, 1997

RE: Mid-Year Report (1/1/95-6/30/95)
Year End Report (7/1/95-12/31/95)
April Quarterly Report (1/1/96-3/31/96)
July Quarterly Report (4/1/96-6/30/96)
12 Day Pre-General Report (10/1/96-10/16/96)
Year End Report (10/17/96-12/31/96)

Dear Mr. Dodson,

The following is offered in response to various questions raised by the Commission with regard to the above referenced reports:

1. Schedule A of the Reports records itemized receipts received by the 6th District Congressional Party. These receipts are dues paid to the 6th District Party by individual counties. The funds transferred from the counties are federally permissible funds collected from the dues paid by individual members of the county organizations.
2. Administrative expenses of the Congressional Party are limited due to the following reasons:
 - a. We are a smaller Congressional District of Wisconsin.
 - b. We do not maintain formal rented office space, but rather work out of the individual private homes of members.
 - c. We do not have any salaried employees.
 - d. We maintain one bank account for conducting District Party business.
 - e. All transactions are in federal accounts.

I hope this response will clarify the questions raised by the letters of inquiry from the Commission.

Sincerely,


Don Grothe



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

DEC 5 1997

Don Grothe, Treasurer
Republican Party of the Sixth Congressional
District of Wisconsin
R. 1 Box 64A
Hancock, WI 54943

Identification Number: C00008755

Reference: Mid-Year Report (1/1/97-6/30/97)

Dear Mr. Grothe:

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. Each committee utilizing separate federal and non-federal accounts is required to allocate any administrative expenses between the accounts in proportion to the BALLOT COMPOSITION METHOD derived from FEC Schedule H1. A Schedule H1 must be filed with the first FEC FORM 3X submitted each year. 11 CFR §106.5(d)

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 during each two year election cycle beginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

Any amendment or clarification should be filed with the Federal Election Commission. 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,

A handwritten signature in cursive script that reads "Andrea Wilkens".

Andrea Wilkens
Reports Analyst
Reports Analysis Division

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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