FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

March 4, 1999

Richard J. Fox, Treasurer
Wisconsin Right to Life
Political Action Committee
10625 W. North Avenue
Milwaukee, WI 53226

Identification Number: C00173278

Reference: 12 Day Pre-General Report (10/1/98-10/19/98)

Dear Mr. Fox:

This letter is to inform you that as of March 3, 1999 the Commission has not received your response to our request for additional information, dated February 10, 1999. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Richard M. Ng on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Richard J. Fox, Treasurer
Wisconsin Right to Life
Political Action Committee
10625 W. North Avenue
Milwaukee, WI 53226

FEB 10 1999

Identification Number: C00173278

Reference: 12 Day Pre-General Report (10/1/98-10/19/98)

Dear Mr. Fox:

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:

-The Summary Page discloses $56,639.20 on Line 7, Column B, but the Detailed Summary Page shows the Line 30, Column B total to be $77,300.47. These figures should be the same. Please amend your report accordingly.

-The totals listed on Lines 30 and 31, Column B of the Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-Your report discloses an outstanding balance(s) beginning this period for a debt(s) owed to Various Radio Stations, Life-Tel, Inc. and Wisconsin Right to Life. However, an outstanding balance(s) at the close of the period was not disclosed on your October Quarterly Report. Please amend your report(s) to clarify this discrepancy and to provide the full name and amount owed to each radio station.

-On Schedule D of your previous report, you disclosed a debt(s) owed to A to Z Printing. This obligation(s), however, has been omitted from this report. Please amend your report to include this debt(s) on Schedule D and Line 10 of the Summary Page. All debts and obligations must be disclosed until extinguished. 11 CFR §104.11

-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 mailing address of each creditor. 11 CFR §104.11

-On Schedule A supporting Line 11(a)(i) of the Detailed Summary Page, your report disclosed contributions from individuals that omit the aggregate year-to-date totals. Please amend your report by supplying the information. 11 CFR §104.3(a)(4)(i)

-Schedule D of your report discloses $6,000 in debts owed to the Wisconsin Right to Life (pertinent portion(s) attached). 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund.

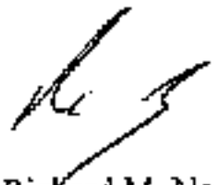
Please amend your report to clarify whether the debt owed to your connected organization was for expenditures which were intended to influence federal elections, and provide the dates of the activity conducted by your connected organization. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

-Schedule E of your report discloses $817.48 in payments to your connected organization for independent expenditures on behalf of federal candidates (pertinent portions attached). An independent expenditure is an expenditure for a communication which expressly advocates the election or defeat of a clearly identified candidate and which is not made with the cooperation or prior consent of, or in consultation with or at the request or suggestion of, any candidate or authorized committee or agent of a candidate. 11 CFR

§109.1(a) Please clarify whether these disbursements meet the definition of an independent expenditure. In addition, please amend your report to clarify whether the payments to your connected organization were made in advance of services rendered.

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,



Richard M. Ng
Reports Analyst
Reports Analysis Division

98033844494

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 1 for LINE NUMBER ____
(Use separate schedules for each numbered line)

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
Wisconsin Right to Life PAC				
A. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Various Radio Stations in 8th CD	$6000 estimate		0	$6000 estimate
Nature of Debt (Purpose): radio ads				
B. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Life-Tel, Inc. 10625 W. North Ave Milwaukee, WI 53226	$9,000 estimate		0	$9,000 estimate
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Wisconsin Right to Life 10625 W. North Ave Milwaukee, WI 53226	$4000 estimate		0	$4000 estimate
Nature of Debt (Purpose): Reporter newsletter				
D. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Wisconsin Right to Life 10625 W. North Ave Milwaukee, WI 53226	$2000 estimate			$2000 estimate
Nature of Debt (Purpose): Salaries				
E. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose):				

1) SUBTOTALS This Period This Page (optional)	21,000
2) TOTALS This Period (last page in this line only)	
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)	
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)	21,000

98033844495

SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Page 1 of 1 Pages

Name of Committee (In Full): Wisconsin Right to Life Political Action Committee

I.D. No.: C001732B

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
John Pantuso	Typesetting Reporter	10/2/98	$412.50	The following candidates were equally affected by these expenditures: U.S. Senate: Russ Feingold - D, Mark Neumann - R; 8th CD: Jay Johnson - D, Mark Green - R; 1st CD: Paul Ryan - R, Lydia Spottswood - D
Wisconsin Right to Life 10625 W. North Ave. Milwaukee, WI 53226	wages	9/12	$699.12	
Wisconsin Right to Life 10625 W. North Ave Milwaukee, Wisc 53226	use of copier	10/14	$44.40	
WRL Education Fund 10625 W. North Ave Milwaukee, WI 53226	shipment of GOTV	10/14	$73.96	
US Postmaster	postage	10/9	$3199.48	

(a) SUBTOTAL of Itemized Independent Expenditures ..... $ 4429.46

(b) SUBTOTAL of Unitemized Independent Expenditures ..... $ _____

(c) TOTAL Independent Expenditures ..... $ 4429.46

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Susan M. Armacost 10/19/98
Signature Date

Subscribed and sworn to before me this 19th day of October, 19 98

My Commission expires: is permanent

NOTARY PUBLIC