

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM
11 2 16 PM '99

Associated Builders & Contractors Political Action Committee



March 1, 1999

Edward D. Ryan
Federal Election Commission
Reports Analysis Division
999 E. Street, NW
Washington, D.C. 20463

Dear Mr. Ryan,

Reference: October Monthly Report (09/01/98-09/30/98)

This correspondence is in response to your letter dated February 25, 1999 regarding the Associated Builders and Contractors Political Action Committee's October Monthly Report. Your letter indicates that you did not receive our letter responding to your February 3 and 5, 1999 inquiries.

Enclosed please find a duplicate copy of ABC PAC's response letter dated February 18, 1999, which, to our understanding, was enclosed with our February Monthly Report (01/01/99-01/31/99). The fourth paragraph provides information concerning the contribution disclosed on Schedule B supporting Line 23 of our October Monthly Report.

If you should have any additional questions on this matter, please do not hesitate to contact me. Thank you.

Sincerely,

Charlotte W. Herbert
Vice President of Government Affairs

1300 North Seventeenth Street | Rosslyn, Virginia 22209
(703) 812-2000 | Fax (703) 812-8202 | www.abc.org

Authorized and Paid for by Associated Builders and Contractors Political Action Committee



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

February 25, 1999

Charlotte W. Herbert, Treasurer
Associated Builders and Contractors Political
Action Committee (ABC/PAC)
1300 North 17th Street, 8th Floor
Rosslyn, VA 22209

Identification Number: C00010421

Reference: October Monthly Report (9/01/98-9/30/98)

Dear Ms. Herbert:

On February 3, 1999, you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

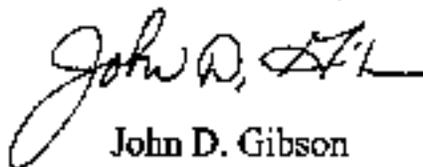
The Commission is in receipt of your amended October Monthly Report dated January 28, 1999 which adequately addresses the cash-on-hand and Column B discrepancies. On February 19, 1999, the Commission received your 1999 February Monthly Report as well as **only copies** of our letters sent to you on February 3 and 5, 1999. You still need to address the following matter:

-Schedule B supporting Line 23 of your report discloses a contribution(s) to a candidate(s) for the Primary election; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. Please clarify the contribution(s) and disclose any redesignations or refunds as necessary on the appropriate schedules.

If this information is not received by the Commission 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 related to this matter, please contact Edward Ryan on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,

A handwritten signature in cursive script, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 9 OF 10
FOR LINE NUMBER 23

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)

Associated Builders and Contractors, PAC

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Rose Connally For Congress 81 Granite Point Road Biddeford, ME 04005 <i>PRIMARY ELECTION DATE 6/19/98</i>	Rose Connally, U.S. HOUSE 1st ME Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 1998	09/16/98	5,000.00 <i>202</i>
Bill Price For Congress 8205 West Main St. Belleville, IL 62223	Bill Price, U.S. HOUSE 12th IL Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 1998	09/16/98	5,000.00
Shawn Terry For Congress 2634 South Carrier Parkway #109 Grand Prairie, TX 75052	Shawn Terry, U.S. HOUSE 24th TX Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	09-15-98	4,000.00
Delbert Roseman For Congress PO Box 23088 Jackson, MS 39225	Delbert Roseman, U.S. HOUSE 4th MS Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 1998	09/15/98	5,000.00
Citizens For Tom Petr PO Box 270 Fort Du Lac, WI 54936	Tom Petr, U.S. HOUSE 6th WI Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 1998	09/15/98	1,000.00
Bill Thomas Campaign Committee PO Box 385 Bakersfield, CA 93302	Bill Thomas, U.S. HOUSE 21st CA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 1998	09/15/98	5,000.00
Brian Rubin For Congress 1203 West Dogwood Woodville, TX 75975	Voided Check Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 1998	09/18/98	-2,500.00
Brian Rubin For Congress 1203 West Dogwood Woodville, TX 75975	Brian Rubin, U.S. HOUSE 2nd TX Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 1998	09/16/98	2,500.00
McCrary For Congress Committee P.O. Box 4850 Shreveport, LA 71134	Jan McCrary, U.S. HOUSE 4th LA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 1998	09/17/98	1,000.00

GROSS TOTAL of Disbursements This Page (optional)

28,000.00

TOTAL This Period (last page this line number only)

Associated Builders & Contractors Political Action Committee



February 18, 1999

Edward D. Ryan
Federal Election Commission
Reports Analysis Division
999 E Street, NW
Washington, D.C. 20463

Dear Mr. Ryan,

This letter is in response to your letters pertaining to information in the Associated Builders and Contractors Political Action Committee's October Monthly Report (09/01/98), 12 Day Pre-General Report (10/01/98-10/14/98) and 30 Day Post-General Report (10/15/98-11/23/98).

ABC PAC has filed comprehensive amendments concerning the differences in the "Calendar Year-to-Date" and "Total This Period" cash totals disclosed in your letters. These amendments accompanied our January 31 Year-End Report (11/24/98-12/31/98).

With regards to our 30 Day Post-General Report (10/15/98-11/23/98) and the contribution refund from a federal candidate totaling \$1,000 which was reported as being designated to the 1998 Primary election, in fact, the contribution refund was designated for the 1998 General election. Please treat this information as an amendment to our 30-Day Post-General Election Report.

Concerning ABC PAC's contribution to Ross Connally for Congress (H-ME-01) on 09/15/98, while you are correct that the Primary election had passed, we understand that the committee had a debt so that the FEC Regulations permit a Primary debt contribution at the time given. Please treat this as an amendment to the extent necessary.

If you have any additional questions on these matters, please do not hesitate to contact me. Thank you very much.

Sincerely,

Charlotte W. Herbert
Vice President of Government Affairs

1300 North Seventeenth Street | Rosslyn, Virginia 22209
(703) 812-2000 | Fax (703) 812-8202 | www.abc.org

Authorized and Paid for by Associated Builders and Contractors Political Action Committee



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

Charlotte W. Herbert, Treasurer
Associated Builders and Contractors Political
Action Committee (ABC/PAC)
1300 North 17th Street, 8th Floor
Rosslyn, VA 22209

FEB 5 1999

Identification Number: C00010421

Reference: 12 Day Pre-General Report (10/01/98-10/14/98)

Dear Ms. Herbert:

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 totals listed on Lines 6(c), 11(a)(i), 11(a)(ii), 11(a)(iii), 11(d), 19, and 20, Column B of the Summary and Detailed Summary Pages 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 total. Please amend your report and any subsequent reports that may be affected by this correction.

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) 694-1130.

Sincerely,

Edward D. Ryan
Reports Analyst
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Charlotte W. Herbert, Treasurer
Associated Builders and Contractors Political
Action Committee (ABC/PAC)
1300 North 17th Street, 8th Floor
Rosslyn, VA 22209

FEB 3 1999

Identification Number: C00010421

Reference: 30 Day Post-General Report (10/15/98-11/23/98)

Dear Ms. Herbert:

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:

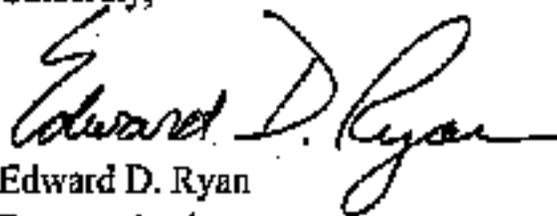
-The totals listed on Lines 6(c), 11(a)(i), 11(a)(ii), 11(a)(iii), 11(d), 19, and 20, Column B of the Summary and Detailed Summary Pages appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B total. Please amend your report and any subsequent reports that may be affected by this correction.

-Your report discloses a contribution refund from a federal candidate totaling \$1,000 on Schedule A supporting Line 16 of the Detailed Summary Page. The refund, however, appears to be designated for the 1998 Primary election rather than the 1998 General election. Please clarify whether this is the correct attribution for this refund and if it is not, then please amend your report by providing the correct election designation.

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,

A handwritten signature in cursive script that reads "Edward D. Ryan". The signature is written in black ink and is positioned above the printed name.

Edward D. Ryan
Reports Analyst
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Charlotte W. Herbert, Treasurer
Associated Builders and Contractors Political
Action Committee (ABC/PAC)
1300 North 17th Street, 8th Floor
Rosslyn, VA 22209

FEB 3 1999

Identification Number: C00010421

Reference: October Monthly Report (9/01/98-9/30/98)

Dear Ms. Herbert:

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:

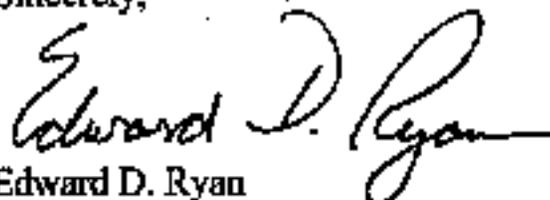
-Schedule B supporting Line 23 of your report discloses a contribution(s) to a candidate(s) for the Primary election; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. Please clarify the contribution(s) and disclose any redesignations or refunds as necessary on the appropriate schedules.

-The beginning cash balance of this report should equal the ending balance of your September Monthly Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-The totals listed on Lines 6(c), 11(a)(i), 11(a)(ii), 11(a)(iii), 11(d), 19, and 20, Column B of the Summary and Detailed Summary Pages 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 total. Please amend your report and any subsequent reports that may be affected by this correction.

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,

A handwritten signature in cursive script that reads "Edward D. Ryan". The signature is written in black ink and is positioned above the typed name.

Edward D. Ryan
Reports Analyst
Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

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)
Associated Builders and Contractors, PAC

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Ross Connally For Congress 81 Granite Point Road Biddeford, ME 04005 <i>PAYROLL ELECTION DATE 6/9/98</i>	U.S. HOUSE 1st ME Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 1998	09/16/98	5,000.00 <i>EDC</i>
Bill Price For Congress 8205 West Main St. Bellaire, IL 62223	U.S. HOUSE 12th IL Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 1998	09/15/98	5,000.00
Shawn Terry For Congress 2834 South Carrier Parkway #109 Grand Prairie, TX 75052	U.S. HOUSE 24th TX Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	09-15-98	4,000.00
Delbert Hoseman For Congress PO Box 23066 Jackson, MS 39225	U.S. HOUSE 4th MS Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 1998	09/16/98	6,000.00
Citizens For Tom Pelt PO Box 270 Fond Du Lac, WI 54935	U.S. HOUSE 8th WI Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 1998	09/16/98	1,000.00
Bill Thomas Campaign Committee PO Box 395 Bakersfield, CA 93302	U.S. HOUSE 21st CA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 1998	09/16/98	5,000.00
Brian Bubin For Congress 1203 West Dogwood Woodville, TX 76979	VOIDED CHECK Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 1998	09/16/98	-2,500.00
Brian Bubin For Congress 1203 West Dogwood Woodville, TX 76979	U.S. HOUSE 2nd TX Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 1998	09/16/98	2,500.00
Jim McCrery For Congress Committee P.O. Box 4850 Shreveport, LA 71134	U.S. HOUSE 4th LA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 1998	09/17/98	1,000.00

SUBTOTAL of Disbursements This Page (optional)

26,000.00

TOTAL This Period (last page this line number only)

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.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> First Class Mail	POSTMARKED
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<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked _____ and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>SM</i> PREPARER	3-11-99 DATE PREPARED