

## ERICAN SUCCES Honorary Chairman • David Dreier

2006 JAN -3 A 10:51

Dec. 23, 1999

Gelind Grable Reports Analysis Division Federal Election Commission 999 E Street, NW Washington, DC 20463

> RE: American Success PAC Identification Number: C00336644

Dear Ms. Grable:

This letter is in response to the FEC notice dated Dec. 22, 1999 which requests disclosure of payments for administrative costs for the American Success PAC.

American Success PAC is a small political action committee, which pays no salaries and incurs limited expenses during the election cycle. The expenses are primarily consulting and fundraising, and have been reported as such. American Success PAC does not have an office, and thus pays no rent or utilities.

Enclosed you will also find copies of the computer produced Schedules A and B that are filed for American Success PAC. We hope that you will approve this format for future use.

I apologize for any inconvenience these issues may have caused. Feel free to call me at (202) 659-8201 if you have any further questions regarding American Success PAC.

Sincercly,

Mullia W. Bonfiglio
Assistant To

Assistant Treasurer



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463.

Anthony J. Roda, Treasurer American Success Political Committee 1155 21st Street, NW, Suite 300 Washington, DC 20036

Identification Number:

C00336644

DEC 2 2 1999

Reference:

Mid-Year Report (1/1/99-6/30/99)

Dear Mr. Roda:

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:

ಪ್ರೇರ್ಥಾನ ರಾವ ದಾಗನೆ ದೀರಿಕುಗೊಳಿಸಲಾಗಿ ದಲ್ಲಿನ ಬಿಡುವಿಗಳಲ್ಲಿ 1997 ಕನ್ನಡಗಳು

-Your report discloses, limited payments for administrative expenses: Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

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 <u>during</u> each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e.,

rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

-Your report includes computer produced formats of Schedules A and B. Computer produced formats may <u>only</u> be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

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,

Gelind Grable

Reports Analyst

Reports Analysis Division

Selind Grabble

281

## 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. Date of Receipt Hand Delivered POSTMARKED ablaFirst Class Mail 12-80-99 POSTMARKED Registered/Certified Mail No Postmark Postmark Hiegible Date of Receipt Received from the House office of Records and Registration Date of Receipt Received from the Senate Office of Public Records Postmarked Other ( Specify): and/or Date of Receipt Electronic Filing 1-5-00 DATE PREPARED