



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

October 12, 2005

Rob Fyrst, Treasurer  
Democratic Party Of Wisconsin Federal Account  
222 W. Washington Avenue  
Suite 150  
Madison, WI 53703

**Response Due Date:  
November 14, 2005**

Identification Number: C00019331

Reference: Amended April Monthly Report (3/1/05-3/31/05), received 6/23/05

Dear Mr. Fyrst:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-The totals listed on Lines 11(a)(i) and 11(a)(ii), Column B of the Detailed Summary Page 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. When an individual's aggregate exceeds the \$200 threshold, the amount should not be deducted from the Column B figure for Line 11(a)(ii). Please amend your report and any subsequent reports that may be affected by this correction.

-Schedule A of your Amended February Monthly Report (1/1/05-1/31/05), received 6/23/05, Amended March Monthly Report (2/1/05-2/28/05), received 6/23/05 and Amended April Monthly Report (3/1/05-3/31/05), received 6/23/05) discloses transfers totaling \$115,000.00 and \$3,400.00 from the "ASDC/Dollars for Democrats" and "ASDC/Affinity Card", respectively, which is a joint fundraising committee affiliated with your committee. The sum of the entries itemized on the memo Schedule A, however, total only \$61,284.00 and \$608.45, respectively.

Please be advised that a memo Schedule A must be provided to itemize your committee's share of the gross contributions received through the joint fundraiser. The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the calendar year, and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount. 11 CFR §102.17(c)(8)(i)(B) Please clarify this discrepancy.

-Your report discloses memo Schedule A's totaling \$9,468.20 for "WI Party Victory Fund", which appears to be your committee's share of the gross contributions received from a joint fundraising committee. However, there are no corresponding transfers-in from the related joint fundraising committee disclosed on Schedule A supporting Line 12 of the Detailed Summary Page. Please amend your report(s) to clarify this apparent discrepancy.

-Schedule A supporting Line 15 of your report discloses an offset to an operating expenditure(s) totaling \$10,030.25 from "Media Strategies & Research"; however, your report(s) does not appear to disclose a disbursement to this entity. Please provide clarifying information regarding this activity and amend your report(s) if necessary.

-Schedule A supporting Line 15 of your report discloses a payment(s) from an organization(s) which is not a political committee(s) registered with the Commission (see attached). It appears the receipt(s) was for goods and/or services provided by your committee. Pursuant to Advisory Opinion 1979-18, the sale/purchase price paid to a political committee could involve the receipt of a contribution from a purchaser if the purchase price exceeds the "usual and normal charge". The term "usual and normal charge" for goods is defined as the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution. Examples of goods and services include equipment, supplies, personnel, advertising services, membership lists, and mailing lists. 11 CFR §100.52(d)(1)

Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided and explain the steps your committee took in determining the amount charged. If your committee provided the goods and/or services at more than the usual and normal charge, the difference between the two is considered to be an in-kind contribution(s) received by your committee from an unregistered organization(s) and is prohibited subject to the limits set forth at 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b).

-Please clarify all expenditures made for "Ballroom Rental," "Equipment Rental," "Event - Elections night," "Event - Hall Rental," "Event - Location site and equipment," "Event - room Rental" and "Event Location cost" on Schedule(s) B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E or F supporting Lines 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Schedule B of your report discloses a reimbursement(s) to an individual(s) for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by committee staff that make up the reimbursement may have to be itemized. For example, if the related payment(s) to any one vendor by the staff aggregates in excess of \$200 for the calendar year, the payment(s) must be itemized as a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and an adequate purpose. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must clarify this in an amendment to this report. Please amend your report to include the missing or clarifying information. 11 CFR §104.9 and Advisory Opinion 1996-20, footnote 3.

-On Schedule H4, your allocated activity or event year-to-date total calculations for the administrative are incorrect. Allocated activity or event year-to-date totals for administrative, voter drive, exempt activity costs and expenses for public communications made by PACs referencing only political parties are derived by aggregating all disbursements during the calendar year for each separate category. Allocated activity or event year-to-date totals for fundraising and direct candidate support activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous event year-to-date total for that category or event. This running event year-to-date total should be disclosed after each disbursement is listed. Please amend your report by providing the correct event year-to-date totals.

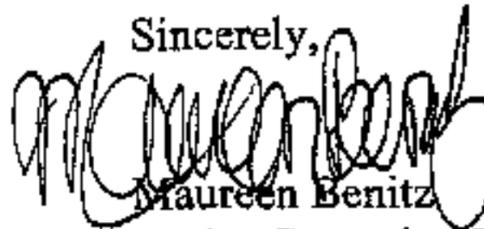
-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): "400-4576285-002" and "DPW 3000896964013150002." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

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Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1135.

Sincerely,



Maureen Benitz

Senior Campaign Finance Analyst  
Reports Analysis Division

Contributor Name	Date	Amount
Assembly Democratic Campaign Committee	3/18/2005	\$5,810.45
Doyle For Wisconsin	3/31/2005	\$331.55
Doyle For Wisconsin	3/31/2005	\$168.61
Elizabeth Burmaster for State Superintendent	3/31/2005	\$250.00
Elizabeth Burmaster for State Superintendent	3/31/2005	\$239.75
Elizabeth Burmaster for State Superintendent	3/31/2005	\$3.53
Elizabeth Burmaster for State Superintendent	3/31/2005	\$534.16
Doyle For Wisconsin	3/31/2005	\$97.87
Doyle For Wisconsin	3/31/2005	\$500.00
Assembly Democratic Campaign Committee	3/2/2005	\$4,185.83
Assembly Democratic Campaign Committee	3/8/2005	\$2,065.95

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