

RECEIVED  
FEC MAIL ROOM

**PATTON BOGGS LLP**  
ATTORNEYS AT LAW  
MAY 11 P 1:15

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May 10, 2001

Benjamin L. Ginsberg  
202-457-6405  
bginsberg@pattonboggs.com

VIA COURIER

Jeff S. Jordan  
Supervisory Attorney  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re: MUR 5197  
1997 Republican Senate-House Dinner Committee and  
Trudy Matthes Barksdale, as Treasurer

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
MAY 11 2 17 PM '01

Dear Mr. Jordan:

This responds to the April 23, 2001 letter from the Federal Election Commission ("Commission") notifying the 1997 Republican Senate-House Dinner Committee and Trudy Matthes Barksdale, as treasurer (collectively "Dinner Committee"), of the complaint filed against it by the National Taxpayers Union ("NTU") in the above referenced Matter Under Review ("MUR"). The complaint was received on April 26, 2001. The Statement of Designation of Counsel form is attached. (See attachment 1.) For the reasons set forth below, there is no basis in law or fact supporting the complaint and the Commission should dismiss it as applied to the Dinner Committee.

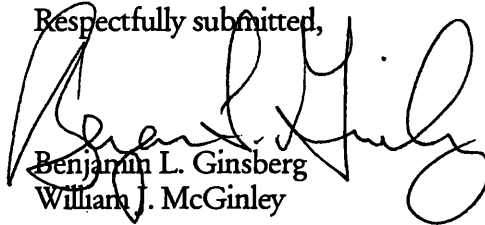
The Dinner Committee terminated on March 19, 1999. (See attachment 2.) It was a joint fundraising committee established pursuant to 11 C.F.R. § 102.17 by the National Republican Senatorial Committee ("NRSC") and the National Republican Congressional Committee ("NRCC"). As such, the Dinner Committee established accounts to receive contributions for the NRSC and NRCC before transferring all proceeds, minus expenses, to the participating Committees. The Dinner Committee also established several non-federal accounts in accordance

Jeff S. Jordan  
May 10, 2001  
Page 2

with 11 C.F.R. § 102.17(c)(3), including a building fund account. See also 2 U.S.C. § 431(8)(B)(viii) & 431(9)(B)(viii); 11 C.F.R. § 114.1(a)(2)(ix).<sup>1</sup> During the Dinner Committee's existence, no questions or allegations were raised by the Commission or any other third party concerning the legality of any donation to the Dinner Committee's building fund account.

The Dinner Committee no longer exists. Accordingly, the Commission should dismiss the complaint as applied to the Dinner Committee.

Respectfully submitted,



Benjamin L. Ginsberg  
William J. McGinley

Attachments

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<sup>1</sup> The donation from Fannie Mae was deposited into the Dinner Committee's building fund account. (See attachment 3.) The donation was not deposited into any account used to finance any election activity. The proceeds from the Dinner Committee's building fund account were disbursed to the NRSC and NRCC's building fund accounts. (See id.) These donations were not used by the Dinner Committee in connection with any election at the federal, state or local level. Therefore, the Dinner Committee complied with the building fund donation, disbursement and reporting requirements under the Act and Commission regulations.

# STATEMENT OF DESIGNATION OF COUNSEL

MUR 5197

NAME OF COUNSEL: Benjamin Ginsberg/Bill McGinley

FIRM: Patton Boggs, LLP

ADDRESS: 2550 M Street, NW

Washington, DC 20037

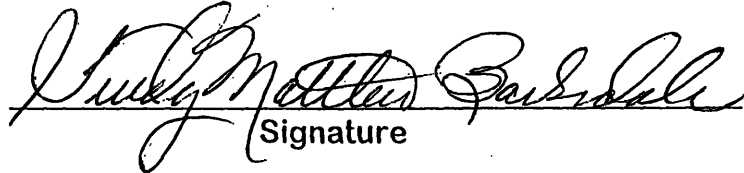
TELEPHONE: ( 202 ) 457-6000

FAX: ( 202 ) 457-6315

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

05/01/01

Date

  
Signature

RESPONDENT'S NAME: Trudy Matthes Barksdale, Treasurer  
1997 Republican Senate-House Dinner

ADDRESS: 7285 Swan Point Way

Columbia, Maryland 21045

TELEPHONE: HOME ( 301 ) 596-7086

BUSINESS ( 301 ) 596-7086



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MS-K

Trudy Matthes Barksdale, Treasurer  
1997 Republican Senate-House Dinner  
7285 Swan Point Way  
Columbia, MD 21045

MAR 19 1999

Identification Number: C00326686

Reference: Year End Termination (11/24/98-12/31/98)

Dear Ms. Barksdale:

Your committee's filing has been accepted as a valid termination because it meets the conditions set forth in 2 U.S.C. §433(d) and 11 CFR §102.3. Your committee is no longer required to file reports on a periodic basis. However, 2 U.S.C. §432(d) and 11 CFR §§102.9(c) and 104.14(b)(3) require that you maintain your records and copies of reports for inspection for at least three (3) years. In addition, you may be required to respond to Commission requests for information regarding your committee's federal election activity and previously filed reports.

If your committee again becomes active in federal elections, it will be required to re-register with the Commission in accordance with the Federal Election Campaign Act and applicable Regulations. Your committee will be treated as a new entity by the Commission and should register as a new committee on FEC FORM 1, pursuant to 2 U.S.C. §§432(g) and 433(a).

Political committees and separate segregated funds which once attained multicandidate committee status and subsequently terminated will, upon re-registration, again be required to meet the criteria set forth in 2 U.S.C. §441a(a)(4).

If you have any questions concerning your status and requirements, please contact the Reports Analysis Division on the toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. L. Kitchen".

Antoinette Kitchen  
Reports Analyst  
Reports Analysis Division

**SCHEDULE I**  
(Article VI(F))

**AGGREGATION PAGE**  
**NON-FEDERAL ACCOUNTS OF NATIONAL PARTY**  
**COMMITTEES**

*(Use a separate Aggregation Page for each nonfederal account)*

NAME OF FEDERAL COMMITTEE		
1997 REPUBLICAN SENATE-HOUSE MEMBER		
NAME OF ACCOUNT	COVERAGE PERIOD	
	FROM 1/1/97	TO 6/30/97
1997 Republican Senate-House Dinner Building Fund		
	<b>COLUMN A</b>	<b>COLUMN B</b>
	<b>TOTAL THIS PERIOD</b>	<b>YEAR-TO-DATE</b>
<b>RECEIPTS</b> <small>(ATTACH SUPPORTING MEMO SCHEDULE A (ITEMS) NO RECEIPTS AGGREGATED IN EXCESS OF \$200 DURING THE CALENDAR YEAR)</small>		
<b>1. TOTAL RECEIPTS:</b>	231,500.00	231,500.00
<b>DISBURSEMENTS</b> <small>(ATTACH SUPPORTING MEMO SCHEDULE B (ITEMS) NO DISBURSEMENTS AGGREGATED IN EXCESS OF \$200 DURING THE CALENDAR YEAR)</small>		
<b>2. TRANSFERS TO FEDERAL OR ALLOCATION ACCOUNT FOR ALLOCABLE EXPENSES:</b>	-0-	-0-
<b>3. TRANSFERS TO STATE/LOCAL PARTY ORGANIZATIONS:</b>	-0-	-0-
<b>4. DIRECT STATE/LOCAL CANDIDATE SUPPORT:</b>	-0-	-0-
<b>5. OTHER DISBURSEMENTS:</b>	231,400.00	231,400.00
<b>6. TOTAL DISBURSEMENTS (ADD 2, 3, 4, AND 5):</b>	231,400.00	231,400.00
<b>BALANCE</b>		
<b>7. BEGINNING CASH ON HAND (FOR COLUMN B USE CASH AS OF JANUARY 1ST):</b>	-0-	-0-
<b>8. RECEIPTS FROM LINE 1:</b>	231,500.00	231,500.00
<b>9. SUBTOTAL:</b>	231,500.00	231,500.00
<b>10. DISBURSEMENTS FROM LINE 6:</b>	231,400.00	231,400.00
<b>11. FINANCIAL CASH ON HAND:</b>	100.00	100.00

1997032263664

SCHEDULE A

ITEMIZED RECEIPTS

PAGE 1 OF 2  
LINE 1

Any information copied from such Reports or 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.

REPUBLICAN HOUSE/SENATE DINNER COMMITTEE

FULL NAME, MAILING ADDRESS AND ZIP CODE	EMPLOYER OCCUPATION	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
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ASHLAND, INC. P.O. BOX 391 ASHLAND, KY 41114		6/13/97	\$20000.00
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AGGREGATE YEAR-TO-DATE \$20000.00

BANC ONE PAC 100 E. BROAD STREET COLUMBUS, OH 43271-0251		6/3/97	\$1500.00
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AGGREGATE YEAR-TO-DATE \$1500.00

BANK AMERICA CORP. P.O. BOX 37000 SAN FRANCISCO, CA 94137		6/11/97	\$20000.00
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AGGREGATE YEAR-TO-DATE \$20000.00

BOLING PAC 1700 N. HOORE STREET ARLINGTON, VA 22209-1904		5/29/97	\$45000.00
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AGGREGATE YEAR-TO-DATE \$45000.00

COMPAC ABF-RESTRICTED 900 19TH STREET N.W., #400 WASHINGTON, DC 20006		6/27/97	\$12000.00
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AGGREGATE YEAR-TO-DATE \$12000.00

FANNIE MAE 3900 WISCONSIN AVENUE, N.W. WASHINGTON, DC 20016		6/17/97	\$20000.00
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AGGREGATE YEAR-TO-DATE \$20000.00

SUB TOTAL FOR PAGE : \$118,500.00

SCHEDULE A

ITEMIZED RECEIPTS

PAGE 2 OF 2  
LINE 1

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REPUBLICAN HOUSE/SENATE DINNER COMMITTEE FULL NAME, MAILING ADDRESS AND ZIP CODE	EMPLOYER OCCUPATION	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
MR. MICHAEL L. KEISER 2450 LAKEVIEW CHICAGO, IL 60614		4/ 2/97	\$15000.00
		AGGREGATE YEAR-TO-DATE	\$15000.00
DR. ROBERT H. KRIEBLE 1 GOLD STREET, #26H HARTFORD, CT 06103		4/ 2/97	\$4000.00
		AGGREGATE YEAR-TO-DATE	\$4000.00
SALLIEMAE 1050 THOMAS JEFFERSON ST., NW WASHINGTON, DC 20007		5/28/97	\$24000.00
		AGGREGATE YEAR-TO-DATE	\$24000.00
SOUTHERN COMPANY SERV. INC 1130 CONN. AVE., N.W. #830 WASHINGTON, DC 20036		6/ 5/97	\$20000.00
		AGGREGATE YEAR-TO-DATE	\$20000.00
STEPHENS GROUP, INC. 114 E. CAPITOL STREET LITTLE ROCK, AR 72201-3893		6/16/97	\$50000.00
		AGGREGATE YEAR-TO-DATE	\$50000.00
TOTAL THIS PERIOD:			\$231,500.00

2025 RELEASE UNDER E.O. 14176

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

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

PAGE 1 OF 1  
 FOOTLINE NUMBER 1-5

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)**

1997 REPUBLICAN SENATE-HOUSE DINNER

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
National Republican Senatorial Committee - Building Fund 425 Second Street, NE Washington, DC 20002	Transfer of Funds	4/30/97	9,000.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General	5/31/97	35,000.00
	<input type="checkbox"/> Other (specify)	6/30/97	71,700.00
National Republican Congressional Committee - Building Fund 320 First Street, SE Washington, DC 20003	Transfer of Funds	4/30/97	9,000.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General	5/31/97	35,000.00
	<input type="checkbox"/> Other (specify)	/30/97	71,700.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (optional) .....

TOTAL This Period (last page this line number only) .....

231,400.00

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