

**PATTON BOGGS LLP**  
ATTORNEYS AT LAW

RECEIVED  
FEC MAIL ROOM

2001 MAY 11 P 1:15

2550 M Street, NW  
Washington, DC 20037-1350  
202-457-6000

Facsimile 202-457-6315  
www.pattonboggs.com

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

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

Re: MUR 5197  
1998 Republican House-Senate Dinner Committee and  
Trudy Matthes Barksdale, as Treasurer

Dear Mr. Jordan:

This responds to the April 23, 2001 letter from the Federal Election Commission ("Commission") notifying the 1998 Republican House-Senate 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.

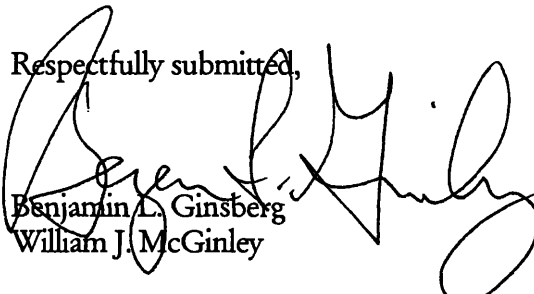
The Dinner Committee terminated on August 27, 1999. (See attachment 2.) It was a joint fundraising committee established pursuant to 11 C.F.R. § 102.17 by the National Republican Congressional Committee ("NRCC") and the National Republican Senatorial Committee ("NRSC"). As such, the Dinner Committee established accounts to accept contributions for the NRCC and NRSC before transferring all proceeds, minus expenses, to the participating Committees. The Dinner Committee also established several non-federal accounts

Jeff S. Jordan  
May 10, 2001  
Page 2

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

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

---

<sup>1</sup> The donation from Freddie Mac 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 NRCC and NRSC'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. Accordingly, 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  
1998 Republican House-Senate 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  
1998 Republican House-Senate Dinner  
7285 Swan Point Way  
Columbia, MD 21045

AUG 27 1999

Identification Number: C00333344

Reference: Termination Report (1/1/99-6/30/99)

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 dark ink, appearing to read "Andrew Dodson".

Andrew J. Dodson  
Senior Reports Analyst  
Reports Analysis Division

219

**SCHEDULE I**  
effective 1/1/91

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

(Use a separate Aggregation Page for each nonfederal account)

<b>NAME OF FEDERAL COMMITTEE</b>		
1998 REPUBLICAN HOUSE-SENATE DINNER		
<b>NAME OF ACCOUNT</b>	<b>COVERAGE PERIOD</b> FROM 1/1/98	TO 3/31/98
1998 Republican House Senate Dinner-Building Fund		
	<b>COLUMN A</b> <b>TOTAL THIS PERIOD</b>	<b>COLUMN B</b> <b>YEAR-TO-DATE</b>
<b>RECEIPTS</b> (ATTACH SUPPORTING MEMO SCHEDULE A IF RECEIPTS AGGREGATING IN EXCESS OF \$200 DURING THE CALENDAR YEAR)		
1. TOTAL RECEIPTS	200,100.00	200,100.00
<b>DISBURSEMENTS</b> (ATTACH SUPPORTING MEMO SCHEDULE B IF DISBURSEMENTS AGGREGATING IN EXCESS OF \$200 DURING THE CALENDAR YEAR)		
2. TRANSFERS TO FEDERAL OR ALLOCATION ACCOUNT FOR ALLOCABLE EXPENSES	-0-	-0-
3. TRANSFERS TO STATE/LOCAL PARTY ORGANIZATION	-0-	-0-
4. DIRECT STATE/LOCAL CANDIDATE SUPPORT	-0-	-0-
5. OTHER DISBURSEMENTS	200,000.00	200,000.00
6. TOTAL DISBURSEMENTS (ADD 2, 3, 4, AND 5)	200,000.00	200,000.00
<b>SUMMARY</b>		
7. BEGINNING CASH ON HAND (FOR COLUMN B USE CASH AS OF JANUARY 1ST)	-0-	-0-
8. RECEIPTS FROM LINE 1	200,100.00	200,100.00
9. SUBTOTAL	200,100.00	200,100.00
10. DISBURSEMENTS FROM LINE 6	200,000.00	200,000.00
11. FINANCIAL CLOSING BALANCE	100.00	100.00

## SCHEDULE A

## ITEMIZED RECEIPTS

Use separate schedule(s)  
for each category of the  
Unrelated Summary PagePAGE 1 OF 1  
FOR LINE NUMBER  
I-1

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)

1998 REPUBLICAN HOUSE-SENATE DINNER - (Building Fund)

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>FREDDIE MAC</b> <b>8100 Jones Branch Drive</b> <b>PHO 3 MS B06</b> <b>McLean, VA 22102</b> Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>N/A</b> <b>Occupation</b> <b>Aggregate Year-to-Date &gt; \$ 100,000.00</b>	<b>Date (month, day, year)</b> <b>3/10/98</b>	<b>Amount of Each Receipt This Period</b> <b>100,000.00</b>
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Southern Company Services, Inc.</b> <b>241 Ralph McGill Blvd, NE</b> <b>Atlanta, GA 30308-3374</b> Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>N/A</b> <b>Occupation</b> <b>Aggregate Year-to-Date &gt; \$ 100,000.00</b>	<b>Date (month, day, year)</b> <b>2/27/98</b>	<b>Amount of Each Receipt This Period</b> <b>100,000.00</b>
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>1997 Republican Senate-House Dinner - Building Fund</b> <b>P. O. Box 1721</b> <b>Washington, DC 20013</b> Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Transfer of Funds</b> <b>Occupation</b> <b>Aggregate Year-to-Date &gt; \$</b>	<b>Date (month, day, year)</b> <b>3/30/98</b>	<b>Amount of Each Receipt This Period</b> <b>100.00</b>
<b>D. Full Name, Mailing Address and ZIP Code</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b> <b>Aggregate Year-to-Date &gt; \$</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>E. Full Name, Mailing Address and ZIP Code</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b> <b>Aggregate Year-to-Date &gt; \$</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>F. Full Name, Mailing Address and ZIP Code</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b> <b>Aggregate Year-to-Date &gt; \$</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
<b>G. Full Name, Mailing Address and ZIP Code</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b> <b>Aggregate Year-to-Date &gt; \$</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (incl page 14's line number only)

200,100.00

**SCHEDULE B****ITEMIZED DISBURSEMENTS**Use separate schedule(s)  
for each category of the  
Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER  
I-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)

1998 REPUBLICAN HOUSE-SENATE DINNER - BUILDING FUND

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
National Republican Congressional Committee 320 First Street, SE Washington, DC 20003	Transfer of Funds	2/27/98	50,000.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/30/98	50,000.00
National Republican Senatorial Committee 425 Second Street, NE Washington, DC 20002	Transfer of Funds	2/27/98	50,000.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/30/98	50,000.00
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)		

GRAND TOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

200,000.00

FETARD47