



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**VIA FACSIMILE AND FIRST CLASS MAIL**  
**(414) 271-7680**

OCT 7 2010

Thomas E. Brown, Esq.  
Gimbel, Reilly, Guerin & Brown LLP  
Two Plaza East, Suite 1170  
330 East Kilbourn Ave.  
Milwaukee, WI 53202

Re: Pre-MUR 503  
Timothy Karp

Dear Mr. Brown:

The Federal Election Commission ("Commission"), the regulatory agency that administers and enforces the Federal Election Campaign Act of 1971, as amended ("the Act"), has ascertained information in the normal course of carrying out its supervisory responsibilities indicating that your client, Timothy Karp, may have violated the Act. Specifically, available information indicates that Mr. Karp was reimbursed for political contributions he made to the Friends of Tom Putri, a federal campaign committee, on March 26, 2007 in the amount of \$500 and on March 11, 2008, also in the amount of \$500. It appears that these contributions were reimbursed using the funds of the Wisconsin & Southern Railroad, a Wisconsin based corporation, and that you, as an officer of the corporation, may have consented to reimbursements. The Act prohibits any person from making a contribution in the name of another person, knowingly permitting his name to be used to effect such a contribution and from knowingly accepting a contribution made by one person in the name of another person. 2 U.S.C. § 441f. The Commission's regulations further prohibit knowingly helping or assisting any person in making a contribution in the name of another. 11 C.F.R. § 110.4(b)(1)(iii). The Act also prohibits corporations from making any contributions or expenditures in connection with a federal election and prohibits corporate officers from consenting to such contributions or expenditures. 2 U.S.C. § 441b(a).

The Commission's Office of the General Counsel is reviewing this information in connection with making a recommendation to the Commission as to whether there is reason to believe that Mr. Karp violated the Act, an initial determination necessary to initiate an investigation into whether a violation has, in fact, occurred. See 2 U.S.C. § 437g(a)(2). Before the General Counsel makes such a recommendation, you may provide in writing any factual or legal materials that you believe are relevant to this matter. Your client's submission, if he chooses to make one, must be submitted within 10 days of receipt of this letter and addressed to the General Counsel's Office. After 10 days, the General Counsel's Office will present its recommendations to the Commission. Any response submitted on behalf of your client will be taken into account in these recommendations. The

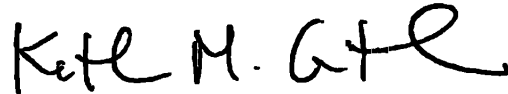
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Commission will then consider the recommendations and, if the Commission finds that there is reason to believe Mr. Karp violated the Act, initiate an enforcement matter regarding the activity.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact Ana J. Peña-Wallace, the attorney handling this matter, at (202) 694-1650 or toll free at 1-800-424-9530. Information is also available on the Commission's web site at [www.fec.gov](http://www.fec.gov). For your information, I have enclosed a brief description of the Commission's preliminary procedures for processing possible violations discovered by the Commission and a designation of counsel form that should be completed and returned to the Commission.

Sincerely,

Christopher Hughey  
Acting General Counsel



BY: Kathleen M. Guith  
Acting Associate General Counsel for  
Enforcement

Enclosures  
Procedures  
Designation of Counsel Form

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