

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

January 2, 2013

PETER COUVAL, TREASURER ILLINOIS VICTORY 709 NORTH AVENUE WAUKEGAN, IL 60085

Response Due Date 02/06/2013

IDENTIFICATION NUMBER: C00448795

## REFERENCE: YEAR-END REPORT (12/01/2011 - 12/31/2011)

Dear Treasurer:

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. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following  $\underline{1}$  item(s):

- Your 2011 November Monthly (10/1/11-10/31/11), Amended December received Year-End Monthly (11/1/11-11/30/11),12/27/11. and (12/1/11-12/31/11), Reports combined, disclose 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. Payments for salary and wages for employees who spend more than 25% of their compensated time on Federal election activities or on activities in connection with a Federal election must be made from a federal account and disclosed on a Schedule B supporting Line 30(b) of the Detailed Summary Page. (11 CFR §106.7) (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. Payments to a consulting, law or accounting firm will be considered acceptable for salary.

Clarification regarding administrative expenses should be disclosed during

## ILLINOIS VICTORY

Page 2 of 2

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 volunteers have provided these services, please confirm this in writing.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. 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. Requests for extensions of time in which to respond will not be considered.

<u>Electronic filers must file amendments (to include statements, designations and reports)</u> 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) 694-1173.

Sincerely,

Ishley alter

Ashley Carter Senior Campaign Finance Analyst Reports Analysis Division

318