



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Michael J. Kasper, Treasurer
Democratic Party of Illinois
P.O. Box 518
Springfield, IL 62705

Identification Number: C00167015

JAN 6 1999

Reference: Amended October Quarterly Report (7/1/98-9/30/98), received
10/23/98

Dear Mr. Kasper:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule H4 discloses a disbursement(s) which is categorized as a fundraising expense(s); however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the direct costs of each fundraising event in which the committee collects both federal and non-federal funds. The costs are allocated according to the funds received ratio and reported on Schedule H2. 11 CFR §§106.5(f) and 106.6(d). Please file a Schedule H2 to disclose the ratio for the fundraising event(s).

-Your Amended October Quarterly Report recategorizes certain expenses to the fundraising category on Schedule H4; however, there are no transfers for these fundraising activities on your Schedule H3. If these expenses are not allocated expenses, they should be disclosed on Schedule B for Line 21(b).

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our

toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Neil Evans
Reports Analyst
Reports Analysis Division

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FEDERAL ELECTION COMMISSION
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RQ-2

Michael J. Kasper, Treasurer
Democratic Party of Illinois
P.O. Box 518
Springfield, IL 62705

JAN 6 1999

Identification Number: C00167015

Reference: October Quarterly Report (7/1/98-9/30/98)

Dear Mr. Kasper:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee and its affiliates from receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek retribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all retributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a retribution or transfer-out to another account or receiving a refund.

DEMOCRATIC PARTY OF ILLINOIS

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Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-Schedule A of your report (pertinent portions attached) discloses an apparent contribution(s) from a corporation(s). 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have received a corporate contribution(s), you must transfer-out the impermissible funds to an account not used to influence federal elections or refund the full amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all transfers-out and refunds should be made within thirty days of the treasurer's receipt of the impermissible funds. In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

-You must attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may establish "best efforts" by providing the Commission with a description of its procedures for requesting the information. It is also in the best interests of the committee to provide a copy of its solicitation. In order to establish "best efforts", the committee must demonstrate that it makes at least one request for the information after the contribution is received. This one request must be made for any solicited or unsolicited contribution that, in the aggregate, exceeds the \$200 threshold and lacks the necessary information.

Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that, in the aggregate, exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make a written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation, and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle.

If a committee receives contributor information after the contributions have been reported, the committee shall either a) file with its next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before its next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.3(a)(4)(i) and 11 CFR § 104.7)

-Schedule H4 discloses 100% non-federal activity. Please be advised that by definition, this activity does not qualify as a shared expense to be allocated between your federal and non-federal accounts. This activity should be itemized on a Schedule B for Line 21(b) of the Detailed Summary Page. Any reimbursement from your committee's non-federal account for any portion of this activity is not permissible and must be returned. Please amend your report to clarify this discrepancy.

DEMOCRATIC PARTY OF ILLINOIS
PAGE 4

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,


Neil Evans
Reports Analyst
Reports Analysis Division

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SCHEDULE A

TYPIED RECEIPTS

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

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OF 13

FOUR LINE NUMBER 11A

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) DEMOCRATIC PARTY OF ILLINOIS IDENTIFICATION #: 000167015 7/01/94 TO 09/30/94

Full Name, Mailing Address and Zip Code GORDON & SCHWENKETER, INC. 540 N. CONFIDENTIAL BLVD. EL SEQUOYO CA 90245	Name of Employer	Date (month, day, year)	Amount of Each Receipt this period
	Occupation:	08/29/1994	2500.00
Receipt For: GENERAL	Aggregate Year-to-Date \$ 2500.00		

Full Name, Mailing Address and Zip Code GORDON AND SCHWENKETER 550 N. CONFIDENTIAL BLVD. EL SEQUOYO CA 90245	Name of Employer	Date (month, day, year)	Amount of Each Receipt this period
	Occupation:	08/29/1994	5000.00
Receipt For: GENERAL	Aggregate Year-to-Date \$ 5000.00		

Full Name, Mailing Address and Zip Code MADRIC 2656 LAKEVIEW AVENUE CHICAGO IL 60614	Name of Employer	Date (month, day, year)	Amount of Each Receipt this period
	Occupation:	07/17/1994	2000.00
Receipt For: GENERAL	Aggregate Year-to-Date \$ 2000.00		

Full Name, Mailing Address and Zip Code MADRIC 2656 LAKEVIEW AVENUE CHICAGO IL 60614	Name of Employer	Date (month, day, year)	Amount of Each Receipt this period
	Occupation:	07/17/1994	1000.00
Receipt For: GENERAL	Aggregate Year-to-Date \$ 2000.00		

Full Name, Mailing Address and Zip Code ROBERT C. FLYNN, CLU 255 E. WILD BLVD. ST. PAUL IL 60107	Name of Employer	Date (month, day, year)	Amount of Each Receipt this period
	Occupation:	09/01/1994	300.00
Receipt For: GENERAL	Aggregate Year-to-Date \$ 300.00		

TOTAL of Receipts this Page (optional) 9200.00

MS

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> First Class Mail	POSTMARKED
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED
<input type="checkbox"/> No Postmark	
<input checked="" type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
 <i>[Signature]</i>	 2-4-99
PREPARER	DATE PREPARED