



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

BQ-2

Stewart H. Winstein, Treasurer
Illinois Democratic Party
13126 Merchandise Mart
Chicago, IL 60654

MAY 4 1994

Identification Number: C00167015

Reference: Mid-Year Report (1/1/93-6/30/93)

Dear Mr. Winstein:

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:

-Please provide a Schedule A to support the entry disclosed on Line 11(c) of the Detailed Summary Page. All contributions from political committees must be itemized on Schedule A regardless of the amount. 2 U.S.C. §434(b)(3)(B)

-Please provide a Schedule A to support the entry on Line 12 of the Detailed Summary Page. All transfers from affiliates received by your committee must be itemized on Schedule A regardless of the amount. 2 U.S.C. §434(b)(3)(D)

-Schedule H4 discloses a disbursement to ASDC-Dollars for Democrats that is illegible. Please amend your report to clearly show the totals.

-Your calculations for Administrative/Voter Drive and all events EVENT YEAR-TO-DATE totals are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year within the category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE

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total should be disclosed after each disbursement is listed. Please amend your report by providing the correct Administrative/Voter Drive and all events EVENT YEAR-TO-DATE totals.

-Your report discloses exempt activity on Schedules H2 and H4 that are shown as 100% non-federal, and the transfers disclosed on Schedule H3 appear to include monies for the 100% non-federal exempt activity. A committee is permitted to pay the entire amount of an allocable activity from its federal account and receive a transfer(s) from its non-federal account solely to cover the non-federal share of the allocable expense(s). 11 CFR §106.5(g)(1). However, a 100% non-federal exempt activity does not fall within the definitions of an allocable expense, and constitutes an impermissible transfer of funds received by your federal account from your non-federal account.

The Commission recommends you immediately transfer the total amount received by your federal account back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Your letter of March 28, 1994, in response to the question of a \$5,000 contribution made to the Barca for Congress Committee, indicates your Committee did in fact make the contribution. However, your report does not disclose this contribution.

All contributions made to federal candidates must be itemized on Schedule B supporting Line 23 of the Detailed Summary Page. Please amend your report accordingly.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Any administrative expenses that are 100% federal should be properly disclosed on a separate Schedule B, supporting Line 21(b) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

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

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letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Robyn Jameson
Reports Analyst
Reports Analysis Division

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