

ETEXT ATTACHMENT

12/17/2005 12 : 67

December 17, 2005

Mr. Christopher J. Morse
 Campaign Finance Analyst
 Reports Analysis Division
 Federal Election Commission
 999 E Street, N.W.
 Washington, D.C. 20463

Re:

- I. July Monthly Report (6/01/05-6/30/05)
- II. August Monthly Report (7/01/05-7/31/05)
- III. September Monthly Report (8/01/05-8/31/05)
- IV. October Monthly Report (9/01/05-9/30/05)

Dear Mr. Morse:

We have received your letters dated November 23, 2005 regarding the Illinois Republican Party's July Monthly Report (6/01/05-6/30/05), August Monthly Report (7/01/05-7/31/05), September Monthly Report (8/01/05-8/31/05), and October Monthly Report (9/01/05-9/30/05). Here are our responses.

I. Re: July Monthly Report (6/01/05-6/30/05)

1. The payments referenced on Schedule B supporting Line 30(b) of our report discloses payment(s) made for "FEA: Postage", "FEA: Fundraising Direct Mail" and "FEA: Fundraising Telemarketing". These expenditures were for the Illinois Republican Party's own fundraising activities and do not reference any clearly identified Federal candidate and do not promote, support, attack or oppose any federal candidate. Likewise these expenditures do not constitute express advocacy and do not result in any in-kind contributions, independent expenditures, or coordinated party expenditures.
2. We have reviewed our Line 18 transfers from the Non-Federal Account for allocated activity for the reporting periods of May Monthly, June Monthly and July Monthly. All transfers were made appropriately within the 70-day timeframe referenced in your letter. Therefore, the transfers we made were timely for allocable expenditures incurred from February 2005 through June 2005. We note that year-to-date through June 30, 2005, the Party could have transferred \$ 207,643.90, and we have only transferred \$ 124,455.41.
3. Schedule H4 discloses \$2,660.98 in payments for "Consulting: Accounting and FEC", "Consulting: IT & Technical", and "Professional Consulting: Compliance." These payments were made to consultants, and were not made to employees of the Illinois Republican Party.
4. On Line 22 we reported a transfer for "Offsets to Operating Expenditures" to the Illinois Republican Party. The original expense was paid out of our Federal Account and allocated on our normal overhead ratio of 85%:15%. At no time did the Non-Federal Account pay any of the Federal Account's share of this expense. When the reimbursement for this expense was received, the Federal Account merely transferred the appropriate share back to the Non-Federal Account. It would have been impermissible for the Federal Account to have kept the entire portion of the refund of this originally allocable expenditure.
5. The expenditures made for "Room Rental and Catering", "Space Rental", and "Tent Rental and Equipment" on Schedule(s) B and H4 were for the Illinois Republican Party's own fundraising activities and do not reference any clearly identified Federal candidate and do not promote, support, attack or oppose any federal candidate.
6. Our Schedule H4 will be amended and payments to individuals that exceed \$500 will be itemized as memo entries regardless of the amount.
7. Our Schedule H4 will be amended and payments to individuals for "Cellular Reimbursement" and other goods and services will be itemized as memo entries regardless of the amount.

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II. Re: August Monthly Report (7/01/05-7/31/05)

1. The payments referenced on Schedule B supporting Line 30(b) of our report discloses payment(s) made for "FEA: Postage", "FEA: Fundraising Direct Mail" and "FEA: Fundraising Telemarketing". These expenditures were for the Illinois Republican Party's own fundraising activities and do not reference any clearly identified Federal candidate and do not promote, support, attack or oppose any federal candidate. Likewise these expenditures do not constitute express advocacy and do not result in any in-kind contributions, independent expenditures, or coordinated party expenditures.

Continued on next Form 99.