

WINSTON & STRAWN LLP  
  
*POLITICAL ACTION COMMITTEE*  
A MULTICANDIDATE COMMITTEE  
1700 K STREET, N.W.  
WASHINGTON, DC 20006

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2009 APR -1 A 11: 08

March 26, 2009

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

**RE: C00283921**

Dear Mr. Morse:

Pursuant to your letter of March 6, 2009 (attached), regarding the need to redesignate two contributions made by the Winston & Strawn PAC from the 2008 general election to future primary campaigns, the Winston & Strawn PAC has contacted the two campaigns to explain the need for redesignation and has, with your kind assistance, amended its Year End Report.

Attached you will find a copy of the letter to the Mikulski for Senate Campaign and to Bob Casey for Senate, Inc. It is my understanding that this letter will complete the process of redesignation.

Thank you for your assistance in this matter, and please advise if any further steps by the Winston & Strawn PAC are required.

Sincerely,

  
Doug Richardson  
Treasurer

DC:597295.1

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**WINSTON & STRAWN, LLP**  
*POLITICAL ACTION COMMITTEE*  
A MULTICANDIDATE COMMITTEE  
1700 K STREET, NW  
WASHINGTON, D.C. 20006

March 11, 2009

Thomas Leonard, Treasurer  
Bob Casey for Senate, Inc  
607 14th Street, N.W. Suite 800  
Washington, DC 20005

Dear Mr. Leonard:

On December 5<sup>th</sup>, 2008, the Winston & Strawn LLC PAC made a \$1,500 contribution to Casey for Senate, Inc. The Winston & Strawn PAC incorrectly filed that contribution with the FEC as a 2008 contribution.

This letter is to advise you that the Winston & Strawn PAC has filed the necessary forms with the FEC to redesignate this \$1,500 contribution to the 2009 reporting period.

We would request that Casey for Senate, Inc. also redesignate this contribution to the 2009 reporting period.

Your assistance with this matter is appreciated.

Sincerely,



Doug Richardson, Treasurer  
Winston & Strawn LLC PAC

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**WINSTON & STRAWN, LLP**  
**POLITICAL ACTION COMMITTEE**  
**A MULTICANDIDATE COMMITTEE**  
1700 K STREET, NW  
WASHINGTON, D.C. 20006

March 11, 2009

Saul E. Gilstein, Treasurer  
Mikulski for Senate Committee  
P. O. Box 13147  
Baltimore, MD 21203

Dear Mr. Gilstein:

On December 4, 2008, the Winston & Strawn LLC PAC made a \$1,000 contribution to the Mikulski for Senate Committee. The Winston & Strawn PAC incorrectly filed that contribution with FEC as a 2008 contribution.

This letter is to advise you that the Winston & Strawn PAC has filed the necessary forms with the FEC for the redesignation of the \$1,000 contribution to the 2009 reporting period.

We would request that the Mikulski for Senate Committee also redesignate the \$1,000 contribution to the 2009 reporting period.

Your assistance with this matter is appreciated.

Sincerely,



Doug Richardson  
Treasurer, Winston & Strawn LLP PAC

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 6, 2009

Douglas Richardson, Treasurer  
Winston & Strawn LLP Political Action Committee  
1700 K Street NW  
Washington, DC 20006

Response Due Date:  
April 6, 2009

Identification Number: C00282921

Reference: Year End Report (11/25/08-12/31/08)

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 item:

- Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the **2008 General** election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

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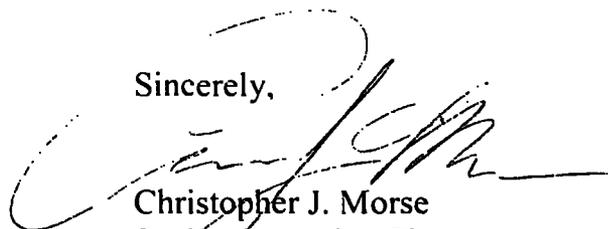
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

**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.**

Electronic filers must file amendments (to include statements, designations and reports) 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) 694-1133.

Sincerely,



Christopher J. Morse  
Senior Campaign Finance Analyst  
Reports Analysis Division

Federal Election Commission  
**ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS**  
 The FEC added this page to the end of this filing to indicate how it was received.

Hand Delivered Date of Receipt

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Other (Specify): Date of Receipt or Postmarked



4/1/09

PREPARER  
(3/2005)

DATE PREPARED

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