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ILLINOIS REPUBLICAN STATE CENTRAL COMMITTEE

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2nd District
PAULA THOMAS
Morton Heights

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GEOFFREY J. PRESH
Chicago

5th District
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Chicago

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PATRICK J. DJURANTE
Addicks

7th District
RICHARD A. WALSH
River Forest

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SHEL MARCUS
Morton Grove

10th District
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Long Grove

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BARBARA J. PETERSON
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RONALD C. SMITH
Secretary
/michael

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20th District
DOM W. ADAMS
Springfield

July 10, 2001

Nicholas Ebinger, Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
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Identification Number: C00005926

Reference: Year End Report (11/28/00-12/31/00)

Mr. Ebinger:

This responds to your letter dated June 27, 2001 regarding the Illinois Republican Party Year End Report. First you question why the Committee transferred \$99,431.12 during the reporting period from the non-federal account for shared activities when the non-federal share for joint activity disclosed in the report was only \$91,625.85. As your own letter recognizes, the party is permitted to make transfers for shared activity within a 70 day time period including up to 10 days before or 60 days after the payment to the vendor. As you know, the Year End Report covered a 43 day reporting period of November 28 through December 31. Thus, the transfers in for joint activity in that time period related not only to the Year End period, but to the prior reporting period as was completely permissible by the Federal Election Commission regulations. In sum, there is no requirement that there be an exact correlation between the amount transferred in during a reporting period and the amount of shared activity disclosed during the reporting period as long as the 70 day window is adhered to as it was here.

Second, you ask the Party to clarify whether the disbursements to Melange Enterprises for fundraising consulting fee related to a specific event. These disbursements were not related to a specific event and thus were not attributed to a specific "fundraising" category. Rather, Melange Enterprises provided generic fundraising advice to the committee which was appropriately categorized as "Administrative/Voter Drive."

I trust this provides the clarification you were seeking.

Sincerely,

Bradley D. Goodrich
Assistant Treasurer

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Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
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