



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 6, 2009

RQ-2

Peter Couval, Treasurer  
Illinois Victory  
709 North Avenue  
Waukegan, IL 60085

Response Due Date:  
April 6, 2009

Identification Number: C00448795

Reference: 12 Day Pre-General Election Report (10/1/08-10/15/08)

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 3 items:

1. Schedule A supporting Line(s) 12 of your report discloses a receipt(s) from **FRIENDS OF DICK DURBIN COMMITTEE - C00148999** which requires further clarification. For example, if this activity represents a transfer of funds, please indicate "**transfer**" or "**transfer of excess funds**" on Schedule A supporting Line 11(c) of your report. If this activity represents a reimbursement for services provided to this committee, please indicate this on Schedule A supporting Line 15 of your report. **Please amend your report to clarify the type of activity this receipt(s) represents.**
2. Schedule A supporting Line 12 discloses a transfer(s)-in from **DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE**. Schedule B supporting Line 21(b) reflects payments for "**Exempt Mail: Halvorson**". Please be advised that a state or local party committee may pay for campaign materials (such as pins, posters, bumper stickers and yard signs) that are distributed by volunteers in connection with activity on behalf of the party's nominees in a general election and for voter drive activity conducted on behalf of the party's Presidential and Vice Presidential nominees. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used, including

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distribution by direct mail (mailings by a commercial vendor or from commercial lists); all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR §§100.87 and 100.147 and to the Campaign Guide for Party Committees.

Please clarify the nature of the transfer(s)-in and subsequent payments for the aforementioned disbursement(s). If the activity disclosed on your report does not meet the definition of "exempt" activity as described above and if any portion of the expenditures were made on behalf of specifically identified candidates, that amount must be disclosed on Schedule B, E or F supporting Line 23, 24 or 25 of the Detailed Summary Page as appropriate.

3. Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B supporting **Line(s) 21(b)** of your report to clarify the following description(s): "**Field Consulting and Field Contractor**". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

**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) 694-1144.

Sincerely,



Edward D. Ryan

Senior Campaign Finance Analyst  
Reports Analysis Division