



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

April 4, 2002

Joan Canel, Treasurer
Joint Action Committee for Political Affairs
P.O. Box 105
Highland Park, IL 60035

Identification Number: C00139659

Reference: July Monthly (6/1/01-6/30/01), August Monthly (7/1/01-7/31/01) and September Monthly (8/1/01-8/31/01) Reports

Dear Ms. Canel:

This letter is to inform you that as of April 3, 2002, the Commission has not received your response to our requests for additional information dated March 13, 2002. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

An adequate response must be received at the Commission by April 24, 2002. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. 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.

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, please contact Nicholas Ebinger on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Joan Canel, Treasurer
Joint Action Committee for Political Affairs
P.O. Box 105
Highland Park, IL 60035

MAR 13 2002

Identification Number: C00139659

Reference: July Monthly Report (6/1/01-6/30/01)

Dear Ms. Canel:

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:

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up,

JOINT ACTION COMMITTEE FOR POLITICAL AFFAIRS

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stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2))
The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

- Your report discloses the receipt and disbursement of undeposited conduit contributions. As required under 11 CFR §110.6(iv), the report by the conduit or intermediary should contain the following information:

- A) The name and mailing address of each contributor and, for each earmarked contribution in excess of \$200, the contributor's occupation and the name of his or her employer;
- B) The amount of each earmarked contribution, the date received by the conduit, and the intended recipient as designated by the contributor; and
- C) The date each earmarked contribution was forwarded to the recipient candidate or authorized committee and whether the earmarked contribution was forwarded in cash or by the contributor's check.

For additional information on the reporting of earmarked contributions,

please refer to page 60 of the Campaign Guide for Non-Connected Committees. Please amend your report to disclose the omitted information as memo entries on the appropriate schedules of receipts and disbursements.

-The beginning cash balance of this report should equal the ending balance of your June Monthly Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-The totals listed on Lines 11(a)(iii), 11(d), 15, 17, 19, 20 21(b), 21(c), 30 and 31, Column B of the Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-Your report discloses activity that falls outside the reporting period. Please amend this report by including only the financial transactions that occurred between 6/1/01 and 6/30/01. Any activity occurring outside this reporting period should be included in the appropriate report(s). 2 U.S.C. §434(b)

-Please amend Schedule B supporting Line 23 by providing the office sought (House, Senate, or President), state and congressional district, if applicable for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

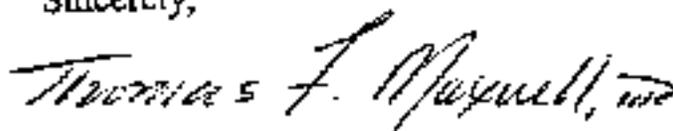
-Your report discloses the receipt and disbursement of undeposited conduit contributions; however, it appears that several of these contributions were forwarded prior to the date of receipt. If the earmarked contributions were incompletely or incorrectly disclosed, you should amend your report with clarifying information. In addition, your report discloses the apparent disbursement of earmarked contributions outside of the permissible time period. As a conduit or intermediary, a committee must forward earmarked contributions, along with a transmittal report, within ten (10) days of receiving an earmarked contribution greater than \$50 and within thirty (30) days if the earmarked contribution is \$50 or less. 11 CFR §§102.8 and 110.6(c)(1)(iii)

-Your report appears to disclose undeposited conduit contributions. Please note, your committee must provide a memo Schedule B to disclose the

name of the contributor, the date each earmarked contribution was forwarded to the recipient candidate or authorized committee and whether the earmarked contribution was forwarded in cash or by the contributor's check.

A 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 letter. Electronic filers must file amendments 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 need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Thomas F. Maxwell, III
Reports Analyst
Reports Analysis Division