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RECEIVED
FEC MAIL ROOM

2000 SEP -5 A 10:50

August 31, 2000

Ms. Alice Kang
Reports Analyst
Report Analysis Division
Federal Election Commission
Washington, D.C. 20463

Identification Number: C00360305

Dear Ms. Kang,

I am the Treasurer for the 10th Congressional District Victory Fund-Federal, and wish to respond to your "preliminary review" letter of August 16, 2000.

As our Statement of Organization notes, we have formed as an "Independent Local Committee", as defined briefly at page 9 of the FEC's "Campaign Guide for Political Party Committees" and described in depth in your Advisory Opinion 1978-9). Relying extensively upon Advisory Opinion 1978-9 as both a legal and factual "roadmap", we have taken the prudent avenues outlined therein to establish our operational structure, in compliance with 11 CFR 110.3(b). The Democratic Party, (and the four Democratic Party component parts of Lake County, New Trier Township, Northfield Township, and Wheeling Township) as it exists within the 10th Congressional District, is established by state statute. 10 ILCS 5/7-7. We have established a field office, where we conduct activities of benefit to Democratic candidates who will be voted upon by voters within the 10th Congressional District, local, and federal. The state Democratic Party did not establish, and does not finance, maintain or control this entity; we operate separate and independent in our decision-making. Working with the local party members within the 10th Congressional District and the candidate campaigns from the district, we are raising funds, state and federal, (in segregated accounts and in full compliance with the FEC rules), so that federal dollars are properly used for federal campaign purposes and state dollars are used to support a fair-share of expenses for state candidate interests. Therefore, to list our state party as an affiliated committee was not only unnecessary; it was not true. Thus, I left line 6 blank.

Per your request, I am filing an amended Statement, stating "none" in line 6, rather than leaving the line blank. I do wish to make clear that while the Committee is separate and independent from the state party, the Committee does work closely with the local party components, as set forth by statute comprising the "membership" of the 10th Congressional District: the Lake County Democratic Party; and the three Cook County township parties of New Trier, Northfield, and Wheeling. None of these four Illinois committees have federal fund components and they will not be establishing individual federal committees in this election cycle. Thus, there is no "proliferation". (Also, they, too, are statutory creations, electing officers and operating under by-laws independent from the state party, much like the Iowa entities described in Advisory Opinion 1978-9.) The instructions on the back of the FEC Statement of Organization pertaining to line 6 seem to exclude them from being listed as "affiliated committees"; rather, together they help to make up one whole, single federal committee.

Should you wish further information, or if you have another recommendation, I look forward to cooperating with you in every way. Please reach me at 847-657-1020. Thank you.

Very truly yours,



Michael Kreloff

attachment

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

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1. (a) NAME OF COMMITTEE IN FULL (Check if name is changed) 10th Congressional District Victory Fund - Federal	2. DATE 8/31/00
(b) Number and Street Address (Check if address is changed) P.O. Box 416	3. FEC Identification Number C00360305
(c) City, State and ZIP Code Highland Park, IL 60035	4. Is This Report An Amendment? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

5. TYPE OF COMMITTEE (Check one)

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
- | | | | |
|-------------------|-----------------------------|---------------|----------------|
| Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
| | | | |
- (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee. (name of candidate)
- (d) This committee is a Independent Local committee of the Democratic Party. (National, State or subordinate) (Democratic, Republican, etc.)
- (e) This committee is a separate segregated fund.
- (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
NONE		

Type of Connected Organization

Corporation Corporation w/o Capital Stock Labor Organization Membership Organization Trade Association Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position of the person in possession of committee books and records.

Full Name	Mailing Address	Title or Position
Michael Kroloff	P.O. Box 416, Highland Park, IL 60035	Treasurer

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position
Michael Kroloff	P.O. Box 416 Highland Park IL 60035	Treasurer

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Bank One, NA	513 Central Ave Highland Park IL 60035-2660

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

TYPE OR PRINT NAME OF TREASURER Michael Kroloff	SIGNATURE OF TREASURER <i>Michael Kroloff</i>	DATE 8/31/00
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NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

For further information contact:
Federal Election Commission
Toll-free 800-424-9530
Local 202-694-1100


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FEC FORM 1
(revised 4/87)

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/>	Hand Delivered	Date of Receipt
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