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RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

AUG 18 2 50 PM '99

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August 13, 1999

MUR 4917

Federal Election Commission  
Office of General Counsel  
999 E Street, NW  
Washington, D.C. 20463

To whom it may concern:

I enclose a signed, notarized complaint against the Committee to Elect Thomas Cramer.  
Should you have questions regarding this matter please direct them to the undersigned.

Sincerely,



Brent M. Christensen

BMC/gld

2000-08-13 09:14:14

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COMMISSION  
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COUNSEL

**BEFORE THE FEDERAL ELECTION COMMISSION  
UNITED STATES OF AMERICA**

**AUG 18 2 50 PM '99**

Brent M. Christensen,  
Complainant,  
vs.  
Committee to Elect Thomas Cramer,  
Respondent.

**COMPLAINT**

Now comes, Brent M. Christensen and complaining of the above-named respondent alleges as follows:

1. Respondent, a principal campaign committee for Thomas A. Cramer, candidate in Illinois' 6<sup>th</sup> Congressional District filed its 1998 year-end report on August 2, 1999, more than six months after it was due.
2. Schedule "A" of Respondent's 1998 year-end report indicates that on October 8, 1998 Respondent received a \$1,000 donation from Planned Parenthood Action Fund of Washington D.C. This contribution was the only itemized contribution listed on Respondent's year-end report that was not an "in-kind" contribution from the candidate himself.
3. In addition, Respondent's 1998 year-end report indicates that the committee also received a limited dollar amount of unitemized contributions in 1998.
4. Upon receiving cash contributions as alleged above, Respondent was under an obligation to deposit said funds in a segregated account in the name of the committee. However, according to Respondent's Statement of Organization filed on June 24, 1998, Respondent failed to designate a bank depository for committee funds. Although Respondent amended its Statement of Organization on May 24, 1999 naming a bank depository, there still remains a serious question of whether cash contributions received by Respondent prior to May 24, 1999 and particularly in 1998 were deposited in a segregated account in the committee's name.
5. There are also other troubling inconsistencies contained in Respondent's 1998 year-end report. First, as indicated above, the report states there was a \$1,000 contribution from Planned Parenthood Action Fund, Washington D.C. on October 8, 1998. However, Respondent's 48-Hour Notice report of October 21, 1998 indicates that there was a \$1,000 contribution from Planned Parenthood Action Fund, Inc. of New York on October 19, 1998. Second, Respondent's 1998 year-end report indicates that no loans were made or guaranteed by the candidate. However, the 48-Hour

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Notice Report of October 21, 1998 states unequivocally that the candidate loaned the committee the sum of \$1,985.63 on October 19, 1998. Finally, Respondent's 1998 year-end report indicates that on October 29, 1998 the candidate made an "in kind" contribution of \$660. However, Respondent's 48-Hour Notice Report of November 2, 1998 lists a candidate cash contribution on October 29, 1998 in the amount of \$3,683.25.

6. Respondent's 1999 mid-year report was filed beyond the July 31<sup>st</sup> deadline. In addition, the 1999 mid-year report lists a disbursement by Respondent directly to the candidate for "rent." This entry requires further investigation of the FEC to determine whether or not the Respondent is using campaign funds to pay the candidate's living expenses.

**WHEREFORE**, Complainant respectfully requests that the Federal Election Commission investigate the allegations in this complaint and, if warranted: A) Sanction the Respondent for its grossly untimely filing of its 1998 year-end report; and B) Audit the Respondent's books, records and accounts to determine whether the inconsistencies herein alleged amount to violations of Federal law.

Respectfully submitted,

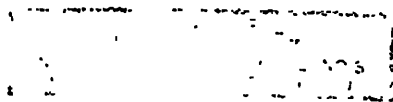


Brent M. Christensen

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(630) 261-0716

**CERTIFICATION**

**SIGNED AND SWORN TO BEFORE ME THIS 13<sup>TH</sup> DAY OF AUGUST, 1999**



Notary Public