

REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: March 29, 2007

ANALYST: Karen J. Balderama

- I. COMMITTEE: Hastert for Congress Committee
C00208090
Dallas Ingemunson, Treasurer
P.O. Box 625
15 E. Wilson Street
Batavia, IL 60510
- II. RELEVANT STATUTE: 2 U.S.C. § 434(b)
11 CFR § 104.3(b)
- III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)

Hastert for Congress Committee ("the Committee") amended its 2006 30 Day Post-General Report to disclose increased debt totaling \$146,686.87 (Attachment 2).

On December 7, 2006, the Committee filed the original 2006 30 Day Post-General Report covering the period from October 19, 2006 to November 27, 2006 (Image 26940861130). The original report disclosed \$0.00 in debts on Line 10 (Debts and Obligations Owed By the Committee) of the Summary Page (Image 26940861131).

On December 21, 2006, the Committee filed an Amended 2006 30 Day Post-General Report covering the period from October 19, 2006 to November 27, 2006 (Image 26940947688). The Amended report disclosed \$146,686.87 in debts on Line 10 (Debts and Obligations Owed By the Committee) of the Summary Page (Image 26940947689).

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On January 12, 2007, an RFAI was sent to the Committee referencing the Amended 2006 30 Day Post-General Report, received on December 21, 2006. The RFAI asked, among other matters, for clarification regarding the substantial increase in debt that was not disclosed in the original filing (Image 27039334794-95).

On January 31, 2006, the Committee filed another Amended 2006 30 Day Post-General Report covering the period from October 19, 2006 to November 27, 2006 (Image 27950046651). This report disclosed no change in the amount reported on Line 10 (Debts and Obligations Owed By the Committee) of the Summary Page (Image 27950046652).

On February 2, 2007, the Committee submitted a letter to the Commission, which stated in part:

“...the Committee incurred significant expenses late in the campaign which had not been anticipated. These included legal fees incurred for the representation of former Speaker Hastert in connection with the Foley investigation. When the Committee received invoices establishing the amount of these fees, the Committee realized that it had more obligations than cash-on-hand on election day. After seeking advice from an FEC specialist concerning the rules on debt retirement, and out of an abundance of caution to ensure full disclosure, the Committee filed an amendment shortly after the original report was filed to disclose certain obligations being included in the Committee’s net debts outstanding figure.” (Image 27039382478-80)

On March 1, 2007, a Reports Analysis Division (RAD) Analyst called the Committee Treasurer, Dallas Ingemunson. Mr. Ingemunson was not available so the Analyst spoke with Ms. Lisa Post, Assistant Treasurer for the Committee. The Analyst informed Ms. Post that the matter concerning the increased debts reported on the Amended 2006 30 Day Post-General Report would be referred to the Office of General Counsel (OGC) for further review. The Analyst also noted that the Commission had received the letter from the Treasurer on February 2, 2006 addressing the issue. Ms. Post stated that she would inform Doug Chalmers, a lawyer for the Committee, who would call the Analyst with any questions (Attachment 3).

On March 2, 2007, Mr. Chalmers called the Analyst and inquired about the referral process. The Analyst informed Mr. Chalmers that the matter was being referred to OGC and that they would notify the Committee accordingly (Attachment 3).

No further communication has been received from the Committee regarding this matter.

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