

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: December 16, 2013

ANALYST: Maureen Benitz

I. COMMITTEE: Democratic Party of Illinois  
C00167015  
Michael Kasper, Treasurer  
P.O. Box 518  
Springfield, IL 62705

II. RELEVANT STATUTE: 2 U.S.C. § 434(e)(2)  
11 CFR § 300.36

III. BACKGROUND:

**Federal Election Activity/Levin Funds (Failure to Disclose All Levin Activity)**

The Democratic Party of Illinois ("the Committee") amended its 2012 October Monthly Report to disclose additional Levin receipts of \$182,175.29, which were not disclosed on the original report (Attachment 2).

On October 19, 2012, the Committee filed the original 2012 October Monthly Report covering the period from September 1, 2012 through September 30, 2012. The report did not disclose a Schedule L or any apparent Levin receipts (Image 12960566254).

On May 1, 2013, the Committee filed an Amended 2012 October Monthly Report. The report disclosed \$182,175.29 in receipts on Line 1(a) of the Schedule L Aggregation Page for Levin Funds (Itemized Receipts from Persons), an increase in Levin receipts of \$182,175.29 from the original report (Image 13940622988).

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On June 4, 2013, the Committee filed an Amended 2012 October Monthly Report. The report disclosed no change in Levin receipts from the previous amendment (Image 13962745017).

On June 27, 2013, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2012 October Monthly Report, received June 4, 2013. The RFAI requested clarification regarding the substantial increase in Levin fund receipts disclosed on the Amended 2012 October Monthly Report that were not disclosed in the original filing (Image 13330034028).

On August 1, 2013, the Committee filed a Miscellaneous Electronic Submission ("Form 99"), which stated, in part:

"This responds to your letter of June 27, 2013 regarding the Committees amended October Monthly Report and Amended 12 Day PreGeneral Report. During the 2012 election, the Committee maintained its Levin funds in its nonfederal account. The Committee did not characterize them as such, until using them for the Levin share of Federal Election Activity disclosed on the 12 day Pre General Report.

In response to the Commissions February 19th, 2013 request that the Committee disclose the transfer out of Levin funds for this activity the Committee amended its 12 day General report on April 23, 2013, to include a Schedule L and L B showing the transfer. Later, the Committee amended the report again together with its October Monthly Report to itemize the specific funds that were characterized as Levin funds. Together, the Levin funds itemized on the amended October Monthly Report and amended 12 day Pre General Report equal the Levin share of the Federal Election Activity disclosed on the 12 day Pre General Report" (Image 13964492604).

On August 13, 2013, the Reports Analysis Division (RAD) Analyst left a voicemail for Sandy Zaremba, a Committee representative. The Analyst explained that the Amended 2012 October Monthly Report could be referred for further action to the Commission. The Analyst then stated that the Committee could file another Form 99 to further explain the increase in activity (Attachment 3).

Subsequently on August 13, 2013, the RAD Analyst left a voicemail for Michael Kasper, the Committee's Treasurer. The Analyst explained that the Amended 2012 October Monthly Report could be referred for further action to the Commission. The Analyst then stated that the Committee could file another Form 99 to further explain the increase in activity (Attachment 3).

On September 26, 2013, the Committee filed an Amended 2012 October Monthly Report. The report disclosed no change in Levin receipts from the previous amendment (Image 13941669501).

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To date, no further communication has been received from the Committee regarding this matter.

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