

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: February 17, 2016

ANALYST: Carolina Mongeon

- I. COMMITTEE: Duckworth for Congress
C00498634
Keith D. Lowey, Treasurer (5/26/15 - Present)
Nancy Chen, Treasurer (10/15/11 - 5/25/15)
P.O. Box 59568
Schaumburg, IL 60159
- II. RELEVANT STATUTES: 11 CFR § 102.9(e)
11 CFR § 110.1(b)(3)
11 CFR § 110.2(b)(3)

III. BACKGROUND:

Excessive, Prohibited and Other Impermissible Contributions: Failure to Refund or Redesignate General Election Contributions within 60 Days of the Candidate's Decision Not to Participate in that Election

Duckworth for Congress ("the Committee") received 2016 General Election contributions from six (6) individuals and three (3) multicandidate political action committees that were not refunded or redesignated within the permissible timeframe from the date Tammy L. Duckworth ("the Candidate") announced her decision to not participate in the 2016 Primary Election. The contributions total \$30,400.00, as disclosed on the 2015 April Quarterly Report (Image 15951159275, Attachment 2).

On March 30, 2015, the Committee filed a Miscellaneous Paper Document ("FEC Form 99") that stated, in full:

"We write as counsel to Tammy for Illinois, the Senate principal campaign committee of U.S. Representative Tammy Duckworth. The purpose of this letter is to inform you and the public that Representative Duckworth is no longer a candidate in the 2016 election for United States House of Representatives in Illinois. She will no longer seek nomination or election to the United States House of Representatives, and has ceased to conduct

campaign activities with respect to the aforementioned election" (Image 15031404464).

During the 2015 April Quarterly reporting period, the Committee received contributions totaling \$30,400.00 from six (6) individuals and three (3) multicandidate political action committees that were designated for the 2016 General Election (Attachment 2).

On September 17, 2015, a Request for Additional Information (RAFI) referencing the 2015 July Quarterly Report was sent to the Committee noting the requirement that the Committee refund or redesignate all 2016 General Election contributions within sixty (60) days of the Candidate's announcement not to seek election to the U.S. House of Representatives and requesting that the Committee take corrective action (Image 201509170300004951).

During the 2015 October Quarterly reporting period, the Committee disclosed the refunds of \$30,400.00 in 2016 General Election contributions from six (6) individuals and three (3) multicandidate political action committees that were made outside the permissible timeframe (Attachment 2).

On October 14, 2015, the Committee filed an FEC Form 99 stating, in part:

"This is in response to your letter concerning the July Quarterly Report (4/1/2015 - 6/30/2015) filed by Duckworth for Congress (the "Committee"). You ask about certain contributions received by the Committee in connection with the general election in 2016. The Committee has refunded the contributions identified in the letter, and such refunds appear on the October Quarterly Report filed on 10/14/2015"¹ (Image 201510149002869806).

Between December 29, 2015 and January 13, 2016, a Reports Analysis Division (RAD) Analyst spoke to the Committee several times regarding this issue (Attachment 3). To date, no further communications have been received from the Committee regarding this matter.

¹ The Committee subsequently filed FEC Form 99s on October 14 and November 20, 2015, in which it indicated intent to terminate.

O-Index (2015-2016)															
Cmte. ID: C00498634 Cmte. Name: DUCKWORTH FOR CONGRESS															
Treasurer Name: LOWEY, KEITH D Address: P.O. BOX 59568, SCHAMBAURG, IL 60159															
Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: QUARTERLY FILER															
Cmte. Type: H (HOUSE)															
Form Tp	Rpt Tp	Avl	Recept Dt	Pgs	Begin Inq#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debts & Loans
MS-T			3/30/2015	2	15031404464				-	-	-	-	-	-	-
F1A		A	10/17/2015	1	201510149002869806				-	-	-	-	-	-	-
MS-T			10/14/2015	1	201510149002869806				-	-	-	-	-	-	-
MS-T			11/20/2015	6	201511209003407516				-	-	-	-	-	-	-
MS-T			1/20/2016	1	201601209003407516				-	-	-	-	-	-	-
MS-T			2/1/2016	1	201602019005301222				-	-	-	-	-	-	-
RQ2	Q2	N	9/17/2015	2	201509170300004951	9/1/2015	9/30/2015	9/17/2015	-	-	-	-	-	-	-
RQ2	Q3	N	12/27/2015	2	201512280300008996	7/1/2015	9/30/2015	12/27/2015	-	-	-	-	-	-	-
F3N	Q1	N	1/15/2016	15	201601159531199278	1/1/2016	3/31/2016	1/15/2016	\$1,052,287	\$36,744	\$1,111,188	\$276,196	-	-	\$0
F3N	Q2	N	7/15/2015	21	201507159000165296	4/1/2015	6/30/2015	7/15/2015	\$275,196	\$959	\$258,230	\$17,925	-	-	\$0
F3N	Q3	N	10/14/2015	14	201510149002869806	7/1/2015	9/30/2015	10/14/2015	\$17,925	\$20,125	\$37,604	\$250	-	-	\$0
F3N	YE	N	1/29/2016	5	201601299004872108	10/1/2015	12/31/2015	1/29/2016	\$250	-	\$250	\$0	-	-	\$0
F1A		A	2/19/2015	1	15970270864				-	-	-	-	-	-	-
F2A		A	2/19/2015	1	15950526085				-	-	-	-	-	-	-
F1A		A	4/15/2015	1	15951159988				-	-	-	-	-	-	-
F1A		A	5/26/2015	4	15971086265				-	-	-	-	-	-	-
Totals										\$385,884	\$1,438,171				

O-Index (2013-2014)																
Cmte. ID: C00498634 Cmte. Name: DUCKWORTH FOR CONGRESS																
Treasurer Name: LOWEY, KEITH D. Address: P.O. BOX 59568, SCHAUMBURG, IL 60159																
Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: QUARTERLY FILER																
Form	Type	H (HOUSE)	Rept Dt	Pgs	Begin	End	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
F3N	Q1	N	4/15/2013	142	13961615824	1/1/2013	3/31/2013			\$100,803	\$352,544	\$168,490	\$283,857	\$0	-	\$0
F3N	Q2	N	7/15/2013	142	13961615824	4/1/2013	6/30/2013			\$100,803	\$352,544	\$168,490	\$283,857	\$0	-	\$0
F3N	Q3	N	10/15/2013	154	13964073587	7/1/2013	9/30/2013			\$283,857	\$327,127	\$97,008	\$513,874	-	-	\$0
F3N	Q4	N	1/15/2014	154	13964073587	10/1/2013	12/31/2013			\$283,857	\$327,127	\$97,008	\$513,874	-	-	\$0
F3N	YE	N	1/15/2014	145	13941809212	7/1/2013	9/30/2013			\$513,974	\$252,905	\$67,581	\$699,298	-	-	\$0
F3N	Q1	N	4/15/2014	152	14903030000	1/1/2014	3/31/2014			\$904,697	\$238,729	\$63,330	\$904,697	-	-	\$0
F3N	Q2	N	7/15/2014	86	14940550148	4/1/2014	6/30/2014			\$904,697	\$238,729	\$63,330	\$904,697	-	-	\$0
F3N	Q3	N	10/15/2014	310	14960713080	7/1/2014	9/30/2014			\$904,697	\$238,729	\$63,330	\$904,697	-	-	\$0
F3N	Q4	N	1/15/2015	352	14961584406	10/1/2014	12/31/2014			\$1,088,252	\$432,232	\$155,297	\$1,385,187	-	-	\$0
F3N	Q1	N	4/15/2015	300	14978280577	1/1/2015	3/31/2015			\$1,088,252	\$432,232	\$155,297	\$1,385,187	-	-	\$0
F3N	Q2	N	7/15/2015	101	14952420789	4/1/2015	6/30/2015			\$1,385,187	\$432,230	\$98,231	\$985,186	-	-	\$0
F3N	Q3	N	10/15/2015	203	14952420789	7/1/2015	9/30/2015			\$985,186	\$432,230	\$98,231	\$985,186	-	-	\$0
F3N	Q4	N	1/15/2016	203	14952420789	10/1/2015	12/31/2015			\$985,186	\$432,230	\$98,231	\$985,186	-	-	\$0
F3N	YE	N	1/30/2015	18	15950528338	1/1/2015	12/31/2014			\$985,186	\$432,230	\$98,231	\$985,186	-	-	\$0
F3N	Q1	N	4/15/2015	2	14940212268	1/1/2015	3/31/2015			\$1,088,338	\$5,355	\$22,407	\$1,052,287	-	-	\$0
F6N			3/6/2014	1	14940548905					-	-	-	-	-	-	-
F6N			3/22/2014	1	14940547381					-	-	-	-	-	-	-
F6N			2/28/2014	1	14940546642					-	-	-	-	-	-	-
F6N			3/11/2014	1	14940557023					-	-	-	-	-	-	-
F6N			3/8/2014	1	14960492530					-	-	-	-	-	-	-
F6N			3/7/2014	1	14960485725					-	-	-	-	-	-	-

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Attachment 1

Duckworth for Congress (C00498634)
Breakdown of Remedied and Unremedied Excessive Contributions (all reports)

Total Amount Remedied Outside of the Permissible Timeframe (all reports):	\$30,400.00
Total Amount Unremedied (all reports):	\$0.00
Total Amount Not Remedied Within the Permissible Timeframe (all reports):	\$30,400.00

Duckworth for Congress (C00498634)
2016 General Election Contributions Refunded Outside Permissible Timeframes, Listed by Contributor

Name	Date	Contribution Amount	Amount Not Refunded Within Timeframe	Refunded # Days since Withdrawal from Race
ATKINSON, BONNIE	1/20/2015	\$2,600.00		
ATKINSON, BONNIE	9/29/2015	-\$2,600.00	\$2,600.00	183
ATKINSON, JOHN M	1/20/2015	\$2,600.00		
ATKINSON, JOHN M	9/29/2015	-\$2,600.00	\$2,600.00	-183
BISHOP, MARY O	2/6/2015	\$2,500.00		
BISHOP, MARY O	9/29/2015	-\$2,500.00	\$2,500.00	-183
BOHNE, JOSEPH WILLIAM	2/17/2015	\$2,300.00		
BOHNE, JOSEPH WILLIAM	9/29/2015	-\$2,300.00	\$2,300.00	-183
BROOKS, JAMES	3/9/2015	\$2,700.00		
BROOKS, JAMES	9/29/2015	-\$2,700.00	\$2,700.00	-183
OFF THE SIDELINES PAC	3/12/2015	\$5,000.00		
OFF THE SIDELINES PAC	9/29/2015	-\$5,000.00	\$5,000.00	-183
ONDRA, STEPHEN	2/4/2015	\$2,500.00		
ONDRA, STEPHEN	2/8/2015	\$200.00		
ONDRA, STEPHEN	9/29/2015	-\$2,700.00	\$2,700.00	-183
SHEET METAL WORKERS INTERNATIONAL ASSOCIATION POLITICAL ACTION LEAGUE	3/11/2015	\$5,000.00		

SHEET METAL WORKERS INTERNATIONAL ASSOCIATION POLITICAL ACTION LEAGUE	9/29/2015	-\$5,000.00	\$5,000.00	-183
UNITED FOOD & COMMERCIAL WORKERS INTERNATIONAL UNION	3/11/2015	\$5,000.00		
UNITED FOOD & COMMERCIAL WORKERS INTERNATIONAL UNION	9/29/2015	-\$5,000.00	\$5,000.00	-183
Total Amount Not Refunded and/or Refunded Outside Permissible Timeframes			\$30,400.00	