



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1995

Date Filmed 3/5/86 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

27 Raising slips (5), 7 12 Day Reports & Comment Sheet, 4 Memos from RAO & proposed RTA's (5), 2 Reference memos (2), 3 check memos (5), 1 permanent file sheet (5),

5 Blue Books (5), 1 memo to Com & other letters (5), 5 Staff initiated letters (5), 10 Proposed Contribution Exemption (5), 1 letter re contribution (3), p. 2 of GC dated 9/12/55, p. 2 of GC dated 6/17/54, 1 suggestion slip (5)

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- | | |
|--|---|
| ☐ (1) Classified Information | ☐ (6) Personal privacy |
| ☒ (2) Internal rules and practices | ☐ (7) Investigatory files |
| ☒ (3) Exempted by other statute | ☐ (8) Banking information |
| ☐ (4) Trade secrets and commercial or financial information | ☐ (9) Well information (geographic or geophysical) |
| ☒ (5) Internal Documents | |

Signed Arthur R. [Signature]

date 2/21/56

FEC 5-21-77



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 27, 1986

Gerald R. Statza
Democratic State Central Committee
of Illinois Federal Account
134 N. LaSalle Street
Suite 2126
Chicago, IL 60602

RE: MUR 1995
Democratic State Committee of
Illinois Federal Account and
Joseph Griffin, as treasurer

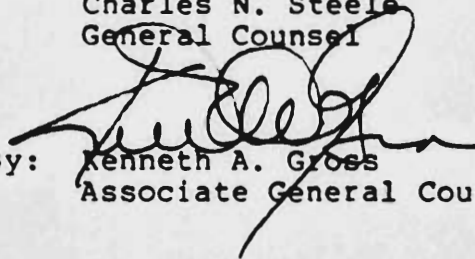
Dear Mr. Statza :

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 27, 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James D. Wascher, Esquire
The Mayor Washington Federal Fund
127 N. Dearborn St, Suite 638
Chicago, IL 60602

RE: MUR 1995
The Mayor Washington Federal
Fund and Robert Hallock,
as treasurer

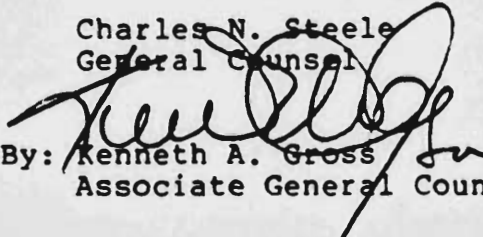
Dear Mr. Wascher:

On January 23, 1986, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1995
The Mayor Washington Federal Fund)
and Robert Hallock, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 23, 1986, the Commission decided by a vote of 6-0 to take the following actions in MUR 1995:

1. Accept the proposed conciliation agreement attached to the General Counsel's Report circulated to the Commission January 17, 1986.
2. Approve the letters attached to the General Counsel's Report circulated to the Commission January 17, 1986.
3. Close the file in this matter.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald and McGarry voted affirmatively for this decision.

Attest:

1-23-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Thurs.,	1-16-86,	2:25
Circulated on 48 hour tally basis:	Fri.,	1-17-86,	2:00
Deadline for vote:	Wed.,	1-22-86,	4:00

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

The Mayor Washington Federal Fund)
and Robert Hallock, as treasurer)

SENSITIVE

MOR: 1995 02:25

GENERAL COUNSEL'S REPORT

Attached for Commission approval is a conciliation agreement signed by James D. Wascher, Esquire, on behalf of his clients, the Mayor Washington Federal Fund and Robert Hallock, as treasurer. Also attached is a copy of a civil penalty check for the amount approved by the Commission.

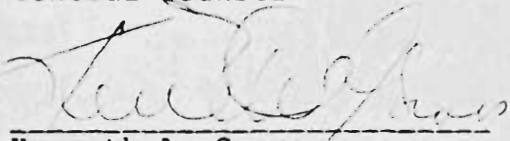
This proposed agreement contains two changes from the agreement originally approved by the Commission. First, this agreement notes that at the time the violations occurred in October, 1984, Ira J. Edelson was the treasurer of the Committee. Second, the agreement notes that the respondents will pay the civil penalty from the Mayor Washington Federal Fund's treasury.

RECOMMENDATION

The Office of the General Counsel recommends the Commission accept this proposed agreement, approve the attached letters, and close the file in this matter.

Charles N. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel

Attachments

1. Letter from Respondent
2. Proposed Conciliation Agreement
3. Copy of Civil Penalty Check
4. Proposed Letters (2)

In the Matter of)
)
The Mayor Washington) MUR 1995
Federal Fund, and)
Robert W. Hallock, as treasurer)

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that the Mayor Washington Federal Fund and Robert W. Hallock, as treasurer ("Respondents") violated 2 U.S.C. § 441a(f) by accepting excessive campaign contributions from the Democratic State Central Committee of Illinois.

NOW, THEREFORE, the Commission and Respondents, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding.

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent, the Mayor Washington Federal Fund, is a multicandidate political committee.
2. Respondent, Robert Hallock, is the now treasurer of the Mayor Washington Federal Fund. Ira J. Edelson was the treasurer of the Mayor Washington Federal Fund at the time of the below-noted violations.
3. The Democratic State Committee of Illinois ("the Committee") is a multicandidate political committee limited to contributing \$5000 per year to political committees.
4. Respondents accepted the following contributions from the Democratic State Committee of Illinois for the 1984 general election:

October 25, 1984	\$ 5,000
October 31, 1984	\$ 5,000
November 5, 1984	\$ 2,500
total	\$12,500

V. 1. The Act limits multicandidate political committees, such as the Committee, to contributing \$5000 per year, 2 U.S.C. §§ 441a(a)(2)(C).

2. The Act prohibits political committees from accepting contributions exceeding the limitations of 2 U.S.C. § 441a(a). 2 U.S.C. § 441a(f).

3. The Respondents' acceptance of \$12,500 in contributions from the Committee constitutes a \$7,500 excessive contribution in violation of 2 U.S.C. § 441a(f).

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Two Thousand Dollars (\$2000), pursuant to 2 U.S.C. § 437g(a)(5)(A), from the treasury of the Mayor Washington Federal Fund.

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or

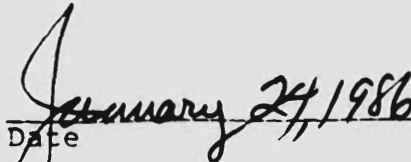
oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

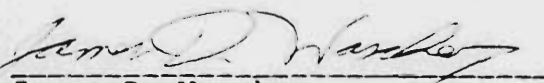
Charles N. Steele
General Counsel

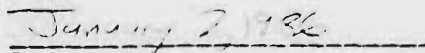
BY:


Kenneth A. Gross
Associate General Counsel


Date

FOR THE RESPONDENTS:


James D. Wascher
Counsel for Respondents


Date

MAYOR WASHINGTON FUND

127 N. Dearborn Street
Suite 638
Chicago, Illinois 60602

312-346-1987

06 JAN 9 12:47

Albert W. Johnson, Sr.
President
Robert W. Hallock
Secretary-Treasurer

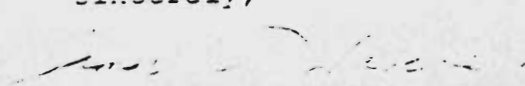
January 7, 1986

Ms. Patty Reilly
Federal Election Commission
Office of the General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

Dear Patty:

Enclosed pursuant to our telephone conversation last Friday is the original "Conciliation Agreement" transmitted by your office to us on December 20, 1985 for Matter No. MUR 1995, along with our check to the Treasurer of the United States in the amount of \$2,000.00. If the Commission approves the agreement, please return a fully executed copy to me at your earliest convenience.

Sincerely,


James D. Wascher
Executive Director

Enclosures



MAYOR WASHINGTON FUND
FEDERAL ACCOUNT

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS A PAYMENT OF FEES DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED

DELUXE - FORM DVC-3 V-7

Civil Penalty-Federal Election Commission Matter No. MUR 1995

06040



MAYOR WASHINGTON FUND
FEDERAL ACCOUNT

1015

1/2 19 86 2.422
710

PAY TO THE ORDER OF TREASURER OF THE UNITED STATES

\$ 2,000.00

TWO THOUSAND-----

DOLLARS



South Shore Bank
Chicago, Illinois 60649

Robert W. Wallah
William Johnson

⑈001015⑈⑈071004226⑈⑈551 783 2⑈



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James D. Wascher, Esquire
The Mayor Washington Federal Fund
127 N. Dearborn St., Suite 638
Chicago, IL 60602

RE: MUR 1995
The Mayor Washington Federal
Fund and Robert Hallock,
as treasurer

Dear Mr. Wascher:

On , 198 , the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Gerald R. Statza
Democratic State Central Committee
of Illinois Federal Account
134 N. LaSalle Street
Suite 2126
Chicago, IL 60602

RE: MUR 1995
Democratic State Committee of
Illinois Federal Account and
Joseph Griffin, as treasurer

Dear Mr. Statza :

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

The Mayor Washington Federal Fund)
and Joseph Hallock, as treasurer)

MUR 1995

GENERAL COUNSEL'S REPORT

On September 24, 1985, the Commission found probable cause to believe that the Mayor Washington Federal Fund and Robert Hallock, as treasurer, violated 2 U.S.C. § 441a(f). Notification letters and the proposed conciliation agreement were mailed on October 4, 1985. Based on discussions with the Respondents, this Office believes it is worthwhile to continue negotiations for an additional thirty days.

Charles N. Steele
General Counsel

October 25, 1985
Date

BY:

Kenneth A. Gross
Associate General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The Mayor Washington Federal Fund)
and Joseph Hallock, as treasurer)

MUR 1995

GENERAL COUNSEL'S REPORT

On September 24, 1985, the Commission found probable cause to believe that the Mayor Washington Federal Fund and Robert Hallock, as treasurer, violated 2 U.S.C. § 441a(f). Notification letters and the proposed conciliation agreement were mailed on October 4, 1985. Based on discussions with the Respondents, this Office believes it is worthwhile to continue negotiations for an additional thirty days.

Charles N. Steele
General Counsel

September 25, 1985
Date

BY:

Kenneth A. Gross
Associate General Counsel

MAYOR WASHINGTON FUND
FEDERAL ACCOUNT

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED

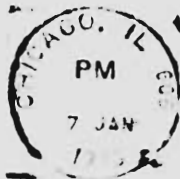
DELUXE - FORM DVC-3 V-7

Civil Penalty-Federal Election Commission Matter No. MUR 1995

05040371337

AYOR WASHINGTON FUND

N. Dearborn Street, Suite 638
Chicago, Illinois 60602



Ms. Patty Reilly
Federal Election Commission
Office of the General Counsel
1325 K Street, N.W.
Washington, D.C. 20463



MAYOR WASHINGTON FUND
FEDERAL ACCOUNT

1015

1/2 19 86

2.422
710

PAY TO THE
ORDER OF

TREASURER OF THE UNITED STATES

\$ 2,000.00

TWO THOUSAND

DOLLARS



South Shore Bank
Chicago, Illinois 60649

Robert W. Wallah
William Johnson

⑈001015⑈ ⑆071004226⑆ ⑈551 783 2⑈

MAYOR WASHINGTON FUND

127 N. Dearborn Street
Suite 638
Chicago, Illinois 60602
312-346-1987

35 DEC 6 9:12

Albert W. Johnson, Sr.
President
Robert W. Hallock
Secretary-Treasurer

November 29, 1985

Ms. Patty Reilly
Federal Election Commission
Office of the General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1995

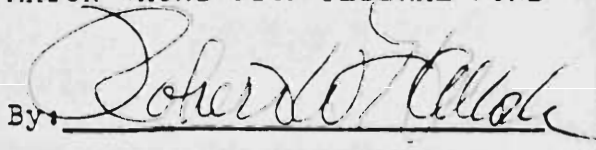
Dear Ms. Reilly:

Pursuant to your telephone conversation with our executive director, James D. Wascher, on November 20, 1985, please accept this letter as the designation of Mr. Wascher as counsel for the Mayor Washington Federal Fund in the above-captioned matter. Mr. Wascher is an attorney licensed to practice in the state and federal courts of Illinois.

Also confirming your telephone conversation with Mr. Wascher, please be advised that no one other than Mr. Wascher is authorized to act on behalf of the Mayor Washington Federal Fund with regard to MUR 1995.

The last correspondence in our file relating to MUR 1995 is a letter from Charles N. Steele of the Commission to me, dated October 4, 1985. In order to assist us in reconstructing our file, please send to Mr. Wascher any correspondence, pleadings or draft agreements or orders prepared or dated after October 4, 1985. If you have any questions, please call Mr. Wascher at the above number. Thank you for your continuing cooperation.

MAYOR WASHINGTON FEDERAL FUND

By: 

Robert W. Hallock
Treasurer

RWH:jdw

YOR WASHINGTON FUND

1 Dearborn Street, Suite 638

Chicago, Illinois 60602



Ms. Patty Reilly
Federal Election Commission
Office of the General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

85DEC 6 A8:12



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 20, 1985

James D. Wascher, Esquire
The Mayor Washington Federal Fund
127 N. Dearborn Street, Suite 638
Chicago, Ill. 60602

RE: MUR 1995
The Mayor Washington
Federal Fund and Robert Hallock,
as treasurer

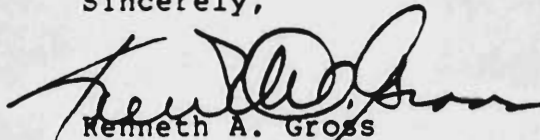
Dear Mr. Wascher:

Pursuant to your December 12, 1985 telephone conversation with Patty Reilly of this Office, enclosed please find a conciliation agreement incorporating your proposed changes. Also enclosed is a copy of the Commission's factual and legal analysis in this matter which you state you are unable to locate.

If you agree with these changes please sign and return this agreement along with a check for the civil penalty. The agreement will then be submitted to the Commission for approval.

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter at 202-376-8200.

Sincerely,


Kenneth A. Gross
Associate General Counsel

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1995

RESPONDENTS Mayor Washington Federal Fund
Robert W. Hallock, as treasurer

SUMMARY OF ALLEGATIONS

It is alleged that the Mayor Washington Federal Fund (the "Fund") and Robert W. Hallock, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions from the Democratic State Central Committee of Illinois-Federal Account (the "Committee").

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 441a(a)(2)(C), a multicandidate political committee is prohibited from making contributions to a political committee, other than an authorized committee or a national political party committee, in any calendar year which, in the aggregate, exceed \$5,000. Pursuant to 2 U.S.C. § 441a(f), a political committee is prohibited from knowingly accepting a contribution in violation of section 441a. It is the Commission's interpretation that a contribution is "knowingly" accepted if the recipient knew that it received the contributions at issue. It is not necessary to a finding of knowing acceptance to show the recipient knew the contributions exceeded the limitations in violation of the law.

The 1984 30 Day Post-General Election Report filed by the Fund disclosed a total of \$7,500 in excessive contributions from the Committee. The report indicated that the Fund received from

the Committee a \$5,000 contribution on October 25, 1984, another \$5,000 contribution on October 31, 1984, and a \$2,500 contribution on November 5, 1984. On its 30 Day Post-General Election Report the Committee reported the purpose of the \$12,500 to the Fund as "GOTV (exempt)," however, no further explanation has been offered regarding the purpose of the money.*/

Requests for Additional Information ("RFAI") were sent to the Respondents on January 16, 1985, informing them of the possible violations of 2 U.S.C. § 441a and recommending appropriate refunds.

On January 28, 1985, the Commission received a letter from Gerald R. Statza, counsel to the Illinois Democratic Party, stating that the Committee had received a refund of \$7,500 from the Fund on January 24, 1985. The response included photocopies of the refund request letter, the check from the Fund, and the Committee's deposit slip.

A Second Notice was sent to the Fund on February 7, 1985, acknowledging that the amount in excess had been returned.

In light of the excessive contributions from the Committee to the Fund, the Office of the General Counsel recommends that the Commission open a MUR and find reason to believe that the Mayor Washington Federal Fund and Robert W. Hallock, as treasurer, violated 2 U.S.C. § 441a(f).

*/ A check of the Fund's reports did not show any get-out-the-vote activity.

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
The Mayor Washington Federal Fund)
and Joseph Hallock, as treasurer)

MUR 1995

95 NOV 29 P12:19

GENERAL COUNSEL'S REPORT

On September 24, 1985, the Commission found probable cause to believe that the Mayor Washington Federal Fund ("the Committee") and Robert Hallock, as treasurer, violated 2 U.S.C. § 441a(f). Notification letters and the proposed conciliation agreement were mailed on October 4, 1985. Additionally, on October 25, 1985, this Office reported to the Commission that an additional thirty days of negotiations appeared worthwhile.

During this negotiation period the Committee replaced key staff members and obtained a new attorney. The Committee notified this Office of these changes, stating its new attorney would conduct all negotiations on the Committee's behalf. In

light of the foregoing, this Office believes it is worthwhile to continue negotiations for another thirty days.

Charles N. Steele
General Counsel

Date

BY:

Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

October 4, 1985

Robert W. Hallock, Treasurer
The Mayor Washington Federal Fund
127 N Dearborn Street #638
Chicago, IL 60602

RE: MUR 1995
The Mayor Washington
Federal Fund and
Robert W. Hallock, as
treasurer

Dear Mr. Hallock:

On September 24, 1985, the Commission determined that there is probable cause to believe the Mayor Washington Federal Fund and you, as treasurer, committed a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with your receipt of excessive campaign contributions from the Democratic State Central Committee of Illinois its treasurer.

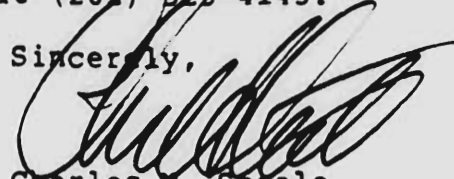
The Commission has a duty to attempt to correct such violations for a period of thirty to ninety days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may institute civil suit in United States District Court and seek payment of a civil penalty.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty payable to the U.S. Treasurer.

Letter to Robert W. Hallock, Treasurer
Page 2

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Patty Reilly, the attorney assigned to this matter, at (202) 522-4143.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

1-26040371671

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
the Mayor Washington Federal) MUR 1995
Fund and Robert Hallock,)
as treasurer)

CERTIFICATION

1. Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of
September 24, 1985, do hereby certify that the Commission
decided by a vote of 4-0 to take the following actions in
MUR 1995:

1. Find probable cause to believe the Mayor
Washington Federal Fund and Robert
Hallock, as treasurer, violated 2 U.S.C.
§ 441a(f).
2. Approve the letter and the conciliation
agreement attached to the General Counsel's
report dated September 12, 1985, subject to
correction of Part IV-3 and Part V of the
conciliation agreement as noted by the
staff during the meeting.

Commissioners Elliott, Josefiak, McDonald, and
McGarry voted affirmatively for the decision.
Commissioners Aikens and Harris were not present.

Attest:

Sept. 25, 1985

Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

SEN TTV

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

the Mayor Washington Federal)
Fund and Robert Hallock, as)
treasurer)

MUR 1995

EXECUTIVE SESSION

SEP 24 1985

GENERAL COUNSEL'S REPORT

I. Background

Pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, on May 7, 1985, the Commission found reason to believe the Mayor Washington Federal Fund ("the Fund") and Robert Hallock, as treasurer, violated 2 U.S.C. § 441a(f). Underlying the Commission's determination was the Fund's reported receipt of \$12,500 in general election contributions in 1984 from the Democratic State Central Committee of Illinois ("the Committee") and Joseph Griffin, as treasurer.^{1/} The Fund reported receiving this money within the twelve day period preceeding the November, 1984 general election. Following an RFAI from the Reports Analysis Division, the Fund refunded \$7,500.

II. Legal Analysis

Responding to the Commission's brief, the Fund denies any intent either to ignore the Commission's findings or to circumvent the law. Respondents explain that the checks received from the Committee had "Federal Fund" as the payee, but were intended for the Fund's state account. Respondents apparently argue that these contributions were not subject to the Act's

^{1/} The Committee requested and received pre-probable cause conciliation.

limitations. Additionally, they note a refund was made after the mistake was brought to their attention.^{2/} Thus, they appear to argue the Act was not violated.

Despite Respondents' assertions, the Office of the General Counsel believes a violation of the Act is presented. Although the contributions were not intended to be used by the Fund for federal purpose, nevertheless Respondents had use of these contributions in the period preceeding the general election. Moreover, Respondents are responsible for monitoring their contributions to ensure the Act's contribution limitations are not exceeded. This Office, therefore, recommends that the Commission find probable cause that Respondents violated 2 U.S.C. § 441a(f).

III. Conciliation and Civil Penalty

Recommendations

1. Find probable cause to believe the Mayor Washington Federal Fund and Robert Hallock, as treasurer, violated 2 U.S.C. § 441a(f).

^{2/} This refund occurred in January, 1985.

2. Approve the attached proposed conciliation agreement and letter.

Date

9/12/85


Charles N. Steele
General Counsel

Attachments

1. Proposed Conciliation Agreement
2. Letter to Respondents

06040071601



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert W. Hallock, Treasurer
The Mayor Washington Federal Fund
127 N Dearborn Street #638
Chicago, IL 60602

RE: MUR 1995
The Mayor Washington
Federal Fund and
Robert W. Hallock, as
treasurer

Dear Mr. Hallock:

On , 1985, the Commission determined that there is probable cause to believe the Mayor Washington Federal Fund and you, as treasurer, committed a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with your receipt of excessive Campaign contributions from the Democratic State Central Committee of Illinois its treasurer.

The Commission has a duty to attempt to correct such violations for a period of thirty to ninety days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may institute civil suit in United States District Court and seek payment of a civil penalty.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty payable to the U.S. Treasurer.

ATTACHMENT 2

Letter to Robert W. Hallock, Treasurer
Page 2

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Patty Reilly, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

0604011635

ILLINOIS DEMOCRATIC STATE CENTRAL COMMITTEE
171 W. RANDOLPH ST. - STE. 501
CHICAGO, IL 60602

1997

9/9

1985

2-54
710

PAY
TO THE
ORDER OF

Federal Election Commission

\$ 2,000 ⁰⁰/₁₀₀

Two Thousand

⁰⁰/₁₀₀ DOLLARS

THE EXCHANGE

National Bank of Chicago
Chicago, Illinois 60603

Barbara J. Perazzo

FOR

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The Democratic State Central) MUR 1995
Committee of Illinois-)
Federal Account and)
Joseph Griffin, as treasurer)
)
)

SEP 11
P 4:01

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Democratic State Central Committee of Illinois-Federal Account and Joseph Griffin, as treasurer ("Respondents") violated 2 U.S.C. § 441a(a)(1)(C) by making excessive contributions.

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent Democratic State Central Committee of Illinois - Federal Account is a multicandidate political committee and Respondent Joseph Griffin is the treasurer of the Committee.
2. Respondents, made \$12,500 in contributions to the Mayor Washington Federal Fund as follows:
 - a. On October 25, 1984, the Respondents contributed \$5000 to the general election.
 - b. On October 31, 1984, Respondents contributed \$5000 to the general election.
 - c. On November 5, 1984, Respondents contributed \$2,500 to the general election.

V. Respondents made excessive contributions in violation of the \$5000 limitation of 2 U.S.C. § 441a(a)(1)(c).

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Two Thousand Dollars (\$2000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

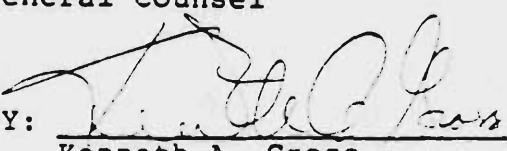
X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

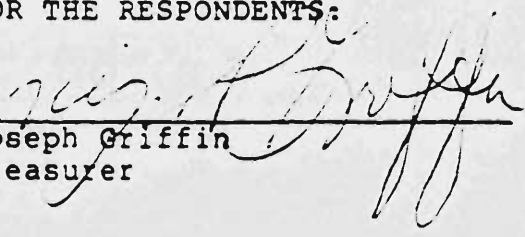
BY:


Kenneth A. Gross
Associate General Counsel

Date

August 27, '85

FOR THE RESPONDENTS:


Joseph Griffin
Treasurer

Date

8-8-85



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 28, 1985

Gerald R. Statza
Democratic State Central Committee of
Illinois Federal Account
134 N. LaSalle St.,
Suite 2126
Chicago, Ill. 60602

RE: MUR 1995
The Democratic State Central
Committee of Illinois
Federal Account and
Joseph Griffin, as treasurer

Dear Mr. Statza:

On August 22, 1985, the Commission accepted the conciliation agreement signed by your clients in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your clients, and it will become a part of the public record within thirty days after this matter has been closed with respect to all other respondents involved. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing within 10 days.

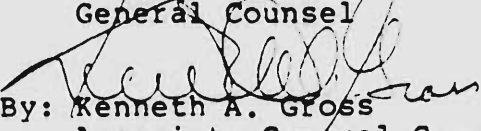
The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

Letter to Gerald R. Statza
Page 2

Enclosed you will find a fully executed copy of the final
conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

060405 / 1633

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The Democratic State Central) MUR 1995
Committee of Illinois -)
Federal Account)
Joseph Griffin, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 22, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1995:

1. Accept the conciliation agreement submitted with the General Counsel's Report signed August 19, 1985.
2. Close the file in this matter in regard to these respondents.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald and McGarry voted affirmatively in this matter.

Attest:

8-22-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: Tues., 8-20-85, 10:09
Circulated on 48 hour tally basis: Tues., 8-20-85, 4:00
Deadline for votes: Thurs., 8-22-85, 4:00

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
The Democratic State Central Committee)
of Illinois - Federal Account and)
Joseph Griffin, as treasurer)

35 AUG 20 AIO: 09
MUR 1995

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement signed by Joseph Griffin, treasurer of the Democratic State Central Committee of Illinois-Federal Account. This agreement contains no changes from the agreement approved by the Commission.

II. RECOMMENDATION

The Office of the General Counsel recommends that the Commission accept this agreement and close the file in this matter in regard to these respondents.

Charles N. Steele
General Counsel

August 15, 1995
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Letter from Respondent
3. Proposed Letter



**Democratic
Party
of Illinois**

3 W. Capitol Plazo
Springfield, Illinois 62701
217/528-3471

Calvin R. Sutker
Chairman

JOHN WATSON
 CHUCK BARNETT
 RICHARD BLOOM
 CARL BRIDGMAN
 TED FREEMAN
 ELEANOR CHAPMAN
 WILLIAM CLINTON
 BOB CONNELLEY
 BILL COOPER
 BEN COCHRAN
 JIM DARRON
 JAMES DEWULF
 LARRY DUFF
 THOMAS E. DUNN
 FRANKIE D'AMICO
 MARLON FROST
 ALLEN FROST
 SHARON G. GILSON
 JIM GOTT
 JOSEPH GREEN
 MICHAEL JACK HAGOPAN
 KAREN HOGAN (N. HART)
 MARLOU HEDLUND
 JIMMY HATCHER
 JAMES HOLLOWAY
 CONSTANCE HOWARD
 WALTER HOLLOWAY
 JOSEPH HUBBARD
 JILLIAN LAURENT
 ELEANOR M. MACCELLA
 GUY MCGOWAN
 BILL MORRIS
 JOHN F. MORRISSE
 PATRICIA MURPHY
 GREG NORTON
 ROMAN PLOMIN
 PHILIP RICE
 PENNY SEARFENS
 CALVIN SOUTHER
 FRANK STEINER
 MONICA TAYLOR
 JAMES M. WALL
 PATRICIA WELCH
 LUCIA W. WILMAN
 STEPHEN W. WINTER

August 9, 198

Ms. Patty Reilly
Attorney
Federal Election Commission
Washington, D.C.
20463

re: MUR 1995

Dear Ms. Reilly:

Enclosed is our signed conciliation agreement in the above matter. Pursuant to our conversation, the civil penalty will be forwarded within 30 days.

Please forward a fully signed copy of the agreement after it is executed by Mr. Gross. Thanking you in advance, I remain,

Sincerely,

Gerald R. Statza
Counsel

GRS : kap

А. П. ПОЧТОВИЧ

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
The Democratic State Central	)	MUR 1995
Committee of Illinois-	)	
Federal Account and	)	
Joseph Griffin, as treasurer	)	
	)	
	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Democratic State Central Committee of Illinois-Federal Account and Joseph Griffin, as treasurer ("Respondents") violated 2 U.S.C. § 441a(a)(1)(C) by making excessive contributions.

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent Democratic State Central Committee of Illinois - Federal Account is a multicandidate political committee and Respondent Joseph Griffin is the treasurer of the Committee.
2. Respondents, made \$12,500 in contributions to the Mayor Washington Federal Fund as follows:
 - a. On October 25, 1984, the Respondents contributed \$5000 to the general election.
 - b. On October 31, 1984, Respondents contributed \$5000 to the general election.
 - c. On November 5, 1984, Respondents contributed \$2,500 to the general election.

V. Respondents made excessive contributions in violation of the \$5000 limitation of 2 U.S.C. § 441a(a)(1)(c).

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Two Thousand Dollars (\$2000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

August 27, 1985
Date

FOR THE RESPONDENTS:

Joseph Griffin
Treasurer

8-8-85
Date



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Gerald R. Statza
Democratic State Central Committee of
Illinois Federal Account
134 N. LaSalle St.,
Suite 2126
Chicago, Ill. 60602

RE: MUR 1995

The Democratic State Central
Committee of Illinois
Federal Account and
Joseph Griffin, as treasurer

Dear Mr. Statza:

On , 1985, the Commission accepted the conciliation agreement signed by your clients in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your clients, and it will become a part of the public record within thirty days after this matter has been closed with respect to all other respondents involved. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing within 10 days.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

ATTACHED FILE

Letter to Gerald R. Statza
Page 2

Enclosed you will find a fully executed copy of the final
conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

2604071607

**Democratic
Party
of Illinois**

05 AUG 1985 18:58

134 N. LaSalle, Suite 2110
Chicago, Illinois 60602
312-372-1141

3 W. Capitol Plaza
Springfield, Illinois 62703
217-528-3471

Colvin R. Statza
Chicago

State Central
Committeemen

August 9, 1985

Ms. Patty Reilly
Attorney
Federal Election Commission
Washington, D.C.
20463

41:43

re: MUR 1995

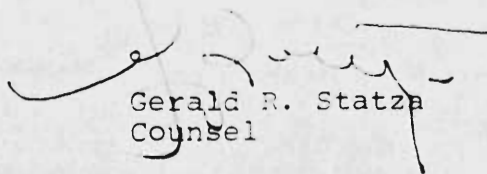
Dear Ms. Reilly:

Enclosed is our signed conciliation agreement in the above matter. Pursuant to our conversation, the civil penalty will be forwarded within 30 days.

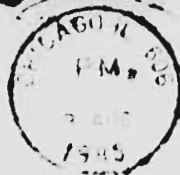
Please forward a fully signed copy of the agreement after it is executed by Mr. Gross. Thanking you in advance, I remain,

Sincerely,

GRS:kap


Gerald R. Statza
Counsel

**Democratic
Party
of Illinois**



Ms. Patty Reilly
Attorney
Federal Election Commission
Washington, D.C.
20463

85 AUG 12 4 51 PM



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert W. Hallock, treasurer
The Mayor Washington Federal Fund
127 N. Dearborn Street #638
Chicago, IL 60602

RE: MUR 1995
The Mayor Washington Federal
Fund and Robert W. Hallock
as treasurer

Dear Mr. Hallock:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 7, 1985, found reason to believe that the Mayor Washington Federal Fund and you, as treasurer, had violated 2 U.S.C. § 441a(f) and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

Letter to Robert W. Hallock
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Patty Reilly, the attorney assigned to handle this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
Charles N. Steele
General Counsel

Enclosure
Brief

2604071701

MAYOR WASHINGTON FUND
MAYOR WASHINGTON FEDERAL FUND

RECEIVED AT THE FEC
QCC#8063
85 JUL 18 P 3:40

July 18, 1985

Federal Election Committee
Washington, D.C. 20643

Attn: Patty Reilly
Ref: MUR 1995

Dear Ms. Reilly:

As requested in our telephone conversation of July 18, 1985, I am writing this letter to detail the specifics of our response to your letter regarding the Commission's findings on May 7, 1985.

At the time of the alleged incident, October 31, 1984, the treasurer of the Mayor Washington Federal Fund was Ira J. Edelson. Mr. Hallock did not become treasurer until March 4, 1985. Consequently, any correspondence relating to activities prior to that date were forwarded immediately upon receipt to Mr. Edelson for action. Mr. Hallock, in fact, never received any correspondence on this matter prior to the current letter.

The above incident itself was due to an error. The checks had "Federal Fund" printed on them as payee. This led to a misunderstanding by the clerk who was making the deposit. The checks were in fact intended for the Mayor Washington Fund, a local and state political committee.

As soon as we were notified about the discrepancy, we returned the money to the contributor immediately. It was never meant to circumvent the law and we apologize for any inconvenience we may have caused. In fact, there was no advantage to the Fund in having the money in that particular account.

It was not our intention either to ignore any communications from the Commission. It was simply due to a lack of understanding as to responsibility in this matter.

Our present treasurer, Mr. Hallock had no knowledge of or participation in this matter and did not receive your prior communication.

Sincerely,

Sylvia J. Shelby
Sylvia J. Shelby

MAYOR WASHINGTON FUND

A copy of our report is (will be) available for purchase from the Clerk's Office, 118 N. Clark Street, Chicago, Illinois 60602

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The Mayor Washington Federal) MUR 1995
Fund and Robert W. Hallock,)
as treasurer)

GENERAL COUNSEL BRIEF

I. STATEMENT OF THE CASE

On May 7, 1985, the Commission determined that there is reason to believe the Mayor Washington Federal Fund ("the Fund") and Robert W. Hallock, as treasurer, violated 2 U.S.C. § 441a(f). Underlying the Commission's determination was the Fund's reported receipt of \$12,500 in general election contributions in 1984 from the Democratic State Central Committee of Illinois ("the Committee") and Joseph Griffin, as treasurer.

II. LEGAL ANALYSIS

The Act prohibits multicandidate committees from contributing more than \$5000 per election to a candidate committee. 2 U.S.C. § 441a(a)(2)(A). Further, the Act prohibits political committees from receiving contributions exceeding the Act's limitations. 2 U.S.C. § 441a(f).

The Fund's reports indicate it received the following contributions from the Committee, a multicandidate committee; \$5,000 on October 25, 1984, \$5,000 on October 31, 1984; and \$2,500 on November 5, 1984. Additionally, the Fund's 1985 April Quarterly Report notes a refund of \$7,500 to the Committee on January 24, 1985. Accordingly, it appears the Fund and Robert W. Hallock, as treasurer, violated 2 U.S.C. § 441a(f).

RECOMMENDATION

1. Find probable cause to believe the Mayor Washington Federal Fund and Robert W. Hallock, as treasurer, violated 2 U.S.C. § 441a(f).

7/3/85
Date

Charles N. Steele
Charles N. Steele
General Counsel
CS

2504011704

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VICE



2-POUND PAK

FROM:

Customer Number if any

TO:

EXPRESS MAIL
NEXT DAY SERVICE

POST OFFICE
TO ADDRESSEE



50895431

▼ TO REMOVE PEEL BACK HERE ▼

EXPRESS MAIL SERVICE





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert W. Hallock, treasurer
The Mayor Washington Federal Fund
127 N. Dearborn Street #638
Chicago, IL 60602

RE: MUR 1995
The Mayor Washington Federal
Fund and Robert W. Hallock
as treasurer

Dear Mr. Hallock:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 7, 1985, found reason to believe that the Mayor Washington Federal Fund and you, as treasurer, had violated 2 U.S.C. § 441a(f) and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

Letter to Robert W. Hallock
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Patty Reilly, the attorney assigned to handle this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
Charles N. Steele
General Counsel

Enclosure
Brief

360403/1707

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The Mayor Washington Federal) MUR 1995
Fund and Robert W. Hallock,)
as treasurer)

GENERAL COUNSEL BRIEF

I. STATEMENT OF THE CASE

On May 7, 1985, the Commission determined that there is reason to believe the Mayor Washington Federal Fund ("the Fund") and Robert W. Hallock, as treasurer, violated 2 U.S.C. § 441a(f). Underlying the Commission's determination was the Fund's reported receipt of \$12,500 in general election contributions in 1984 from the Democratic State Central Committee of Illinois ("the Committee") and Joseph Griffin, as treasurer.

II. LEGAL ANALYSIS

The Act prohibits multicandidate committees from contributing more than \$5000 per election to a candidate committee. 2 U.S.C. § 441a(a)(2)(A). Further, the Act prohibits political committees from receiving contributions exceeding the Act's limitations. 2 U.S.C. § 441a(f).

The Fund's reports indicate it received the following contributions from the Committee, a multicandidate committee; \$5,000 on October 25, 1984, \$5,000 on October 31, 1984; and \$2,500 on November 5, 1984. Additionally, the Fund's 1985 April Quarterly Report notes a refund of \$7,500 to the Committee on January 24, 1985. Accordingly, it appears the Fund and Robert W. Hallock, as treasurer, violated 2 U.S.C. § 441a(f).

RECOMMENDATION

1. Find probable cause to believe the Mayor Washington Federal Fund and Robert W. Hallock, as treasurer, violated 2 U.S.C. § 441a(f).

Date

7/3/85

Charles N. Steele
Charles N. Steele
General Counsel

0604001700



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1985

Gerald R. Statza
134 N. La Salle Street
Suite 2126
Chicago, IL 60602

RE: MUR 1995
Democratic State Central
Committee of Illinois-
Federal Account and
Joseph Griffin, as treasurer

Dear Mr. Statza:

On May 7, 1985, the Federal Election Commission determined that there is reason to believe that the Democratic State Central Committee of Illinois-Federal Account and Joseph Griffin, as treasurer violated 2 U.S.C. § 441a(a)(2)(C). At your request, the Commission determined on June 25, 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

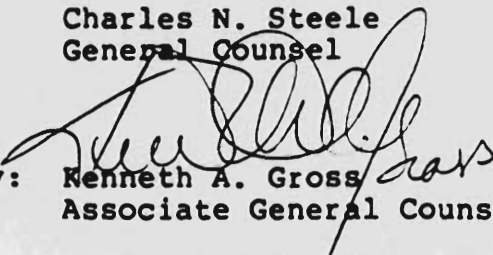
Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in

Letter to Gerald Statza
Page 2

the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Patty Reilly, the attorney assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

by: 
Kenneth A. Gross
Associate General Counsel

Enclosures

250403/1711

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The Democratic State Committee) MUR 1995
of Illinois - Federal Account)
Joseph Griffin, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of June 25, 1985, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in MUR 1995:

1. Enter into conciliation with the Democratic State Central Committee of Illinois Federal Account and Joseph Griffin, as treasurer.
2. Approve the proposed conciliation agreement attached to the General Counsel's report dated June 17, 1985.
3. Approve and send the letter attached to the General Counsel's report dated June 17, 1985.

Commissioners Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision; Commissioner Aikens dissented.

Attest:

6/27/85
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

RECEIVED
JUN 17 1995
FEDERAL ELECTION COMMISSION
BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

The Democratic State Committee)
of Illinois-Federal Account)

Joseph Griffin, as treasurer)

05 JUN 17 P4:11

MUR 1995

SENSITIVE

GENERAL COUNSEL REPORT

I. BACKGROUND

On May 7, 1985, the Commission found reason to believe that the Democratic State Central Committee of Illinois-Federal Account ("the Committee") violated 2 U.S.C. § 441a(a)(2)(C). Underlying the Commission's action is the Committee's reported contributions of \$12,500 to the Mayor Washington Federal Fund ("the Fund").

Responding to the Commission's notification, the Committee admits making \$7,500 in excessive contributions. Additionally, the Committee notes this amount was refunded, providing RAD with documentation of this refund. Finally, the Committee requests pre-probable cause conciliation.^{1/} As developed below, this Office recommends that the Commission grant Respondents' request.

II. LEGAL ANALYSIS

The Act prohibits multi-candidate political committees from making contributions exceeding \$5000 to political committees (other than authorized committees or national political party committees). The Committee made a total of \$12,500 in

^{1/} Respondents' letter requests a hearing on this matter. They have orally modified this as a request pursuant to 11 C.F.R. § 111.18(d).

contributions to the Fund for the general election. Accordingly, the Committee exceeded the Act's limitations by \$7,500.

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

RECOMMENDATION

1. Enter into conciliation with the Democratic State Central Committee of Illinois Federal Account and Joseph Griffin, as treasurer.
2. Approve the attached proposed conciliation agreement.
3. Approve and send the attached letter.

Charles N. Steele
General Counsel

Jan 17, 1985
Date

Kenneth A. Gross
Associate General Counsel

Attachments

1. Proposed Conciliation Agreement
2. Letter to Respondent
3. Request for Pre-Probable Cause Conciliation

35040371714

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Democratic State Central Committee) RAD Referral 85L-12a and
of Illinois-Federal Account) 12b
Joseph Griffin, as treasurer)
Mayor Washington Federal Fund)
Robert W. Hallock, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 7, 1985, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral 85L-12a and 12b:

1. Open a MUR.
2. Find reason to believe that the Democratic State Central Committee of Illinois-Federal Account and Joseph Griffin, as treasurer, violated 2 U.S.C. § 441a(a)(2)(C).
3. Find reason to believe that the Mayor Washington Federal Fund violated 2 U.S.C. § 441a(f).
4. Approve the letters attached to the First General Counsel's Report signed May 1, 1985.
5. Approve the General Counsel's Factual and Legal Analysis attached to the First General Counsel's Report signed May 1, 1985.

Commissioners Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter; Commissioner Aikens did not cast a vote.

Attest:

5-8-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

SENSITIVE

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

85L-

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION _____

RAD REFERRAL# 12a and 12b
STAFF MEMBER
Marybeth Tarrant

SOURCE OF REFERRAL: I N T E R N A L L Y G E N E R A T E D

RESPONDENTS' NAMES: Democratic State Central Committee of
Illinois-Federal Account and Joseph Griffin,
as treasurer; Mayor Washington Federal Fund
and Robert W. Hallock, as treasurer

RELEVANT STATUTE: 2 U.S.C. §§ 441a(a)(2)(C) and 441a(f)

INTERNAL REPORTS

CHECKED: Reports filed by Respondents

FEDERAL AGENCIES

CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of the General
Counsel by the Reports Analysis Division ("RAD").

SUMMARY OF ALLEGATIONS

It is alleged that the Democratic State Central Committee of
Illinois-Federal Account (the "Committee") and Joseph Griffin, as
treasurer, violated 2 U.S.C. § 441a(a)(2)(C) by making excessive
contributions and the Mayor Washington Federal Fund (the "Fund")
and Robert W. Hallock, as treasurer, violated 2 U.S.C. § 441a(f)
by knowingly accepting excessive contributions.

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 441a(a)(2)(C), a multicandidate
political committee is prohibited from making contributions to a
political committee, other than an authorized committee or a

national political party committee, in any calendar year which, in the aggregate, exceed \$5,000. Pursuant to 2 U.S.C.

\$ 441a(f), a political committee is prohibited from knowingly accepting a contribution in violation of section 441a. It is the Commission's interpretation that a contribution is "knowingly" accepted if the recipient knew that it received the contributions at issue. It is not necessary to a finding of knowing acceptance to show the recipient knew the contributions exceeded the limitations in violation of the law.

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The 1984 30 Day Post-General Election Report filed by the Fund disclosed a total of \$7,500 in excessive contributions from the Committee. The report indicated that the Fund received from the Committee a \$5,000 contribution on October 25, 1984, another \$5,000 contribution on October 31, 1984, and a \$2,500 contribution on November 5, 1984. On its 30 Day Post-General Election Report the Committee reported the purpose of the \$12,500 to the Fund as "GOTV (exempt)," however, no further explanation has been offered regarding the purpose of the money.*/-

Requests for Additional Information ("RFAI") were sent to the Respondents on January 16, 1985, informing them of the possible violations of 2 U.S.C. § 441a and recommending appropriate refunds.

On January 28, 1985, the Commission received a letter from Gerald R. Statza, counsel to the Illinois Democratic Party, stating that the Committee had received a refund of \$7,500 from

*/- A check of the Fund's report did not show any get-out-the-vote activity.

the Fund on January 24, 1985. The response included photocopies of the refund request letter, the check from the Fund, and the Committee's deposit slip.

A Second Notice was sent to the Fund on February 7, 1985, acknowledging that the amount in excess had been returned.

In light of the excessive contributions from the Committee to the Fund, the Office of the General Counsel recommends that the Commission open a MUR and find reason to believe that the Respondents violated 2 U.S.C. § 441a.

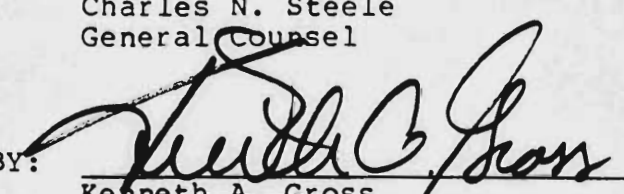
RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Democratic State Central Committee of Illinois-Federal Account and Joseph Griffin, as treasurer, violated 2 U.S.C. § 441a(a)(2)(C).
3. Find reason to believe that the Mayor Washington Federal Fund violated 2 U.S.C. § 441a(f).
4. Approve the attached letters.
5. Approve the General Counsel's Factual and Legal Analysis.

Charles N. Steele
General Counsel

May 1, 1985
Date

BY:


Kenneth A. Gross
Associate General Counsel

Attachments

1. RAD Referrals
2. Proposed letters
3. General Counsel's Factual and Legal Analysis



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Gerald R. Statza
134 N. La Salle Street
Suite 2126
Chicago, IL 60602

RE: MUR 1995

Democratic State Central
Committee of Illinois-
Federal Account and
Joseph Griffin, as treasurer

Dear Mr. Statza:

On May 7, 1985, the Federal Election Commission determined that there is reason to believe that the Democratic State Central Committee of Illinois-Federal Account and Joseph Griffin, as treasurer violated 2 U.S.C. § 441a(a)(2)(C). At your request, the Commission determined on , 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in

ATTACHMENT # 2

Letter to Gerald Statza
Page 2

the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Patty Reilly, the attorney assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

by: Kenneth A. Gross
Associate General Counsel

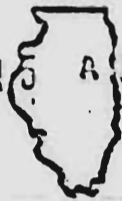
Enclosures

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Democratic
Party
of Illinois

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State Center
Circuit Clerk

May 31, 1985

Ms. Patty Riley
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Re: Conciliation Hearing / MUR 1995

Dear Ms. Riley:

Please be advised that we are hereby requesting a pre'probable cause hearing for conciliation. For your information I will be in Washington from June 21 thru June 26 if I can be of any help. Please contact me if you have any questions or concerns.

Sincerely

Gerald R. Staza
Gerald R. Staza
Counsel

GRS:dp

ATTACHMENT #3



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert W. Hallock, treasurer
The Mayor Washington Federal Fund
127 N. Dearborn Street #638
Chicago, IL 60602

RE: MUR 1995
The Mayor Washington Federal
Fund and Robert W. Hallock
as treasurer

Dear Mr. Hallock:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 7, 1985, found reason to believe that the Mayor Washington Federal Fund and you, as treasurer, had violated 2 U.S.C. § 441a(f) and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

Letter to Robert W. Hallock
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Patty Reilly, the attorney assigned to handle this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
Charles N. Steele
General Counsel

Enclosure
Brief

3504071723

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The Mayor Washington Federal) MUR 1995
Fund and Robert W. Hallock,)
as treasurer)

GENERAL COUNSEL BRIEF

I. STATEMENT OF THE CASE

On May 7, 1985, the Commission determined that there is reason to believe the Mayor Washington Federal Fund ("the Fund") and Robert W. Hallock, as treasurer, violated 2 U.S.C. § 441a(f). Underlying the Commission's determination was the Fund's reported receipt of \$12,500 in general election contributions in 1984 from the Democratic State Central Committee of Illinois ("the Committee") and Joseph Griffin, as treasurer.

II. LEGAL ANALYSIS

The Act prohibits multicandidate committees from contributing more than \$5000 per election to a candidate committee. 2 U.S.C. § 441a(a)(2)(A). Further, the Act prohibits political committees from receiving contributions exceeding the Act's limitations. 2 U.S.C. § 441a(f).

The Fund's reports indicate it received the following contributions from the Committee, a multicandidate committee; \$5,000 on October 25, 1984, \$5,000 on October 31, 1984; and \$2,500 on November 5, 1984. Additionally, the Fund's 1985 April Quarterly Report notes a refund of \$7,500 to the Committee on January 24, 1985. Accordingly, it appears the Fund and Robert W. Hallock, as treasurer, violated 2 U.S.C. § 441a(f).

RECOMMENDATION

1. Find probable cause to believe the Mayor Washington Federal Fund and Robert W. Hallock, as treasurer, violated 2 U.S.C. § 441a(f).

7/3/85
Date

Charles N. Steele
Charles N. Steele
General Counsel
CS

3604071725

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

85 JUN 26 A10:55

In the Matter of)
The Mayor Washington Federal)
Fund)
Robert Hallock, as treasurer)

MUR 1995

SENSITIVE

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as it pertains to the Mayor Washington Fund and Robert Hallock, as treasurer, based on the assessment of the information presently available.

85 JUN 24 1995
Date

Charles N. Steele
Charles N. Steele
General Counsel

**Democratic
Party
of Illinois**

GCCH 7084
FEC

85 JUN



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114 N. LaSalle, Suite 1100
Chicago, Illinois 60610
312 572-1181

1 W. Capitol Plaza
Springfield, Illinois 62701
217 528-0471

Colvin R. Sulker
Chairman

State Central
Committeemen

May 31, 1985

Ms. Patty Riley
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Re: Conciliation Hearing / MUR 1995

Dear Ms. Riley:

Please be advised that we are hereby requesting a pre'probable cause hearing for conciliation. For your information I will be in Washington from June 21 thru June 26 if I can be of any help. Please contact me if you have any questions or concerns.

Sincerely

Gerald R. Staza
Counsel

GRS:dp

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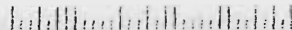
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**Democratic
Party
of Illinois**



Ms. Patty Riley
Federal Election Commission
1325 K Street N. W.
Washington, D. C. 20463

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**Democratic
Party
of Illinois**

THE FEC
35 MAY 27 1985 : 42

1134 N. LaSalle, Suite 2126
Chicago, Illinois 60602
(312) 372-1161

1 W. Capitol Plaza
Springfield, Illinois 62701
(312) 328-3471

Calvin R. Sutker
Chairman

State Central
Committeemen

CCC
#7571

May 21, 1985

Ms. Marybeth Tarrant
Federal Election Commission
Washington, D.C. 20463

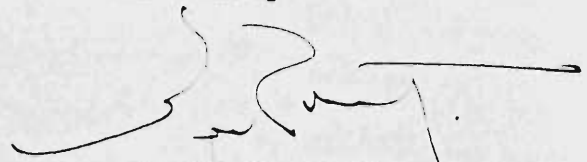
Re: FEC vs. Democratic State Central
Committee of Illinois, MUR 1995

Dear Ms. Tarrant:

Enclosed is a sworn statement of mine concerning
the above matter. The Committee has at all times
sought to comply fully with the Federal Election
Campaign Act. Any possible violations were
inadvertent or mistaken.

If you have need of further information, feel free
to contact me.

Sincerely,



Gerald R. Statza,
Counsel

GRS/c

enc.

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**Democratic
Party
of Illinois**

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State Central
Committeemen

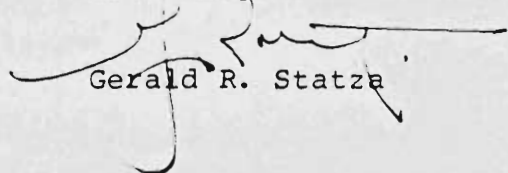
Re: FEC vs. Democratic State Central Committee
of Illinois, MUR 1995

The affiant, Gerald R. Statza, under oath does swear
and states as follows:

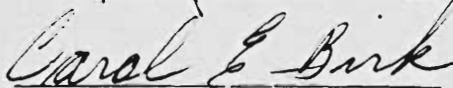
1. That he is and has been the counsel to the Democratic
State Central Committee since September, 1984.
2. That he was actively involved with the expenditures
of the Committee in the fall election of 1984.
3. That the alleged excessive contributions made to
the Mayor Washington Federal Fund, on which MUR 1995 is
based, were made within 7 days of election day.
4. That affiant did not review said contributions and
was not told of said contributions.
5. That at the earliest possible date, after notice
by the FEC, a refund was demanded from the Mayor
Washington Federal Fund. Said refund was granted.
6. It is the opinion of the affiant that any excessive
contributions were inadvertent and mistakenly made by
parties without knowledge of the law.

FURTHER AFFIANT SAYETH NOT.

Sincerely,


Gerald R. Statza

SUBSCRIBED AND SWORN to
before me this 22nd day
of May, 1985.


Notary Public

My Commission Expires March 11, 1986

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1995

NAME OF COUNSEL: Gerald R. Statza

ADDRESS: 134 N. LaSalle St., Suite 2126
Chicago, Illinois 60602

TELEPHONE: (312) 372-1161 or (312) 663-4410

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

May 20, 1985
Date

Joseph B. Griffin
Signature

Calvin A. Rutledge
Chairman

RESPONDENT'S NAME: Democratic State Central Committee of Illinois-Federal Account
and Joseph Griffin, treasurer

ADDRESS: 134 N. LaSalle St., Suite 2126
Chicago, Illinois 60602

HOME PHONE: _____

BUSINESS PHONE: (312) 372-1161

44:59 MAY 24

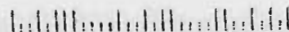
**Democratic
Party
of Illinois**



Ms. Marybeth Tarrant
Federal Election Commission
Washington, D.C. 20463



30 MAY 24 48:42





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 15, 1985

Joseph Griffin, Treasurer
Democratic State Central Committee of
Illinois-Federal Account
134 North LaSalle, Suite 2126
Chicago, Illinois 60602

RE: MUR 1995

Dear Mr. Griffin:

On May 7, 1985, the Federal Election Commission determined that there is reason to believe the Democratic State Central Committee of Illinois-Federal Account and you, as treasurer, violated 2 U.S.C. § 441a(a)(2)(C), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

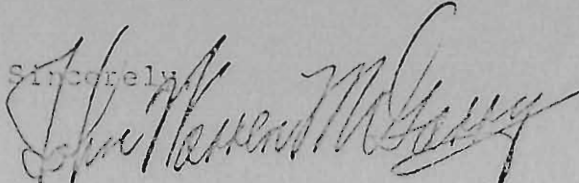
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Joseph Griffin, Treasurer
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,



John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

96040371735

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1995

RESPONDENTS Democratic State Central Committee of Illinois-
Federal Account and Joseph Griffin, as treasurer

SUMMARY OF ALLEGATIONS

It is alleged that the Democratic State Central Committee of Illinois-Federal Account (the "Committee") and Joseph Griffin, as treasurer, violated 2 U.S.C. § 441a(a)(2)(C) by making excessive contributions to the Mayor Washington Federal Fund (the "Fund").

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 441a(a)(2)(C), a multicandidate political committee is prohibited from making contributions to a political committee, other than an authorized committee or a national political party committee, in any calendar year which, in the aggregate, exceed \$5,000. Pursuant to 2 U.S.C. § 441a(f), a political committee is prohibited from knowingly accepting a contribution in violation of section 441a. It is the Commission's interpretation that a contribution is "knowingly" accepted if the recipient knew that it received the contributions at issue. It is not necessary to a finding of knowing acceptance to show the recipient knew the contributions exceeded the limitations in violation of the law.

The 1984 30 Day Post-General Election Report filed by the Fund disclosed a total of \$7,500 in excessive contributions from the Committee. The report indicated that the Fund received from the Committee a \$5,000 contribution on October 25, 1984, another \$2,500 contribution on October 31, 1984, and a \$2,500

contribution on November 5, 1984. On its 30 Day Post-General Election Report the Committee reported the purpose of the \$12,500 to the Fund as "GOTV (exempt)," however, no further explanation has been offered regarding the purpose of the money.*/

Requests for Additional Information ("RFAI") were sent to the Respondents on January 16, 1985, informing them of the possible violations of 2 U.S.C. § 441a and recommending appropriate refunds.

On January 23, 1985, the Commission received a letter from Gerald R. Statza, counsel to the Illinois Democratic Party, stating that the Committee had received a refund of \$7,500 from the Fund on January 24, 1985. The response included photocopies of the refund request letter, the check from the Fund, and the Committee's deposit slip.

A Second Notice was sent to the Fund on February 7, 1985, acknowledging that the amount in excess had been returned.

In light of the excessive contributions from the Committee to the Fund, the Office of the General Counsel recommends that the Commission open a HUR and find reason to believe that the Democratic State Central Committee of Illinois-Federal Account and Joseph Griffin, as treasurer, violated 2 U.S.C. § 441a(a)(2)(C).

*/ A check of the Fund's reports did not show any get-out-the-vote activity.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 15, 1985

Robert W. Hallock, Treasurer
Mayor Washington Federal Fund
127 North Dearborn Street, #638
Chicago, Illinois 60602

RE: MUR 1995

Dear Mr. Hallock:

On May 7, 1985, the Federal Election Commission determined that there is reason to believe the Mayor Washington Federal Fund and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

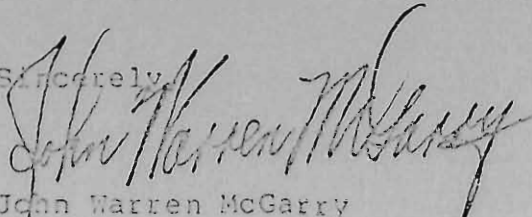
If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Robert W. Hallock, Treasurer
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,



John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

26040371739

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1995

RESPONDENTS Mayor Washington Federal Fund
Robert W. Hallock, as treasurer

SUMMARY OF ALLEGATIONS

It is alleged that the Mayor Washington Federal Fund (the "Fund") and Robert W. Hallock, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions from the Democratic State Central Committee of Illinois-Federal Account (the "Committee").

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 441a(a)(2)(C), a multicandidate political committee is prohibited from making contributions to a political committee, other than an authorized committee or a national political party committee, in any calendar year which, in the aggregate, exceed \$5,000. Pursuant to 2 U.S.C. § 441a(f), a political committee is prohibited from knowingly accepting a contribution in violation of section 441a. It is the Commission's interpretation that a contribution is "knowingly" accepted if the recipient knew that it received the contributions at issue. It is not necessary to a finding of knowing acceptance to show the recipient knew the contributions exceeded the limitations in violation of the law.

The 1984 30 Day Post-General Election Report filed by the Fund disclosed a total of \$7,500 in excessive contributions from the Committee. The report indicated that the Fund received from

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the Committee a \$5,000 contribution on October 25, 1984, another \$5,000 contribution on October 31, 1984, and a \$2,500 contribution on November 5, 1984. On its 30 Day Post-General Election Report the Committee reported the purpose of the \$12,500 to the Fund as "GOTV (exempt)," however, no further explanation has been offered regarding the purpose of the money.*/

Requests for Additional Information ("RFAI") were sent to the Respondents on January 16, 1985, informing them of the possible violations of 2 U.S.C. § 441a and recommending appropriate refunds.

On January 23, 1985, the Commission received a letter from Gerald R. Statza, counsel to the Illinois Democratic Party, stating that the Committee had received a refund of \$7,500 from the Fund on January 24, 1985. The response included photocopies of the refund request letter, the check from the Fund, and the Committee's deposit slip.

A Second Notice was sent to the Fund on February 7, 1985, acknowledging that the amount in excess had been returned.

In light of the excessive contributions from the Committee to the Fund, the Office of the General Counsel recommends that the Commission open a MUR and find reason to believe that the Mayor Washington Federal Fund and Robert W. Hallock, as treasurer, violated 2 U.S.C. § 441a(f).

*/ A check of the Fund's reports did not show any get-out-the-vote activity.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Joseph Griffin, Treasurer
Democratic State Central Committee of
Illinois-Federal Account
134 North LaSalle, Suite 2126
Chicago, Illinois 60602

RE: MUR

Dear Mr. Griffin:

On , 1985, the Federal Election Commission determined that there is reason to believe the Democratic State Central Committee of Illinois-Federal Account and you, as treasurer, violated 2 U.S.C. § 441a(a)(2)(C), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Joseph Griffin, Treasurer
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

0604071745



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert W. Hallock, Treasurer
Mayor Washington Federal Fund
127 North Dearborn Street, #638
Chicago, Illinois 60602

RE: MUR

Dear Mr. Hallock:

On , 1985, the Federal Election Commission determined that there is reason to believe the Mayor Washington Federal Fund and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Robert W. Hallock, Treasurer
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

050107145

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 27 March 1985

ANALYST: Brian J. Hancock

I. COMMITTEE: Democratic State Central Committee of
Illinois-Federal Account (C00167015)
Joseph Griffin, Treasurer
134 North LaSalle, Suite 2126*/
Chicago, IL 60602

II. RELEVANT STATUTE: 2 U.S.C. §441a(a)(2)(C)

III. BACKGROUND:

Excessive Contributions to a Political Committee

The 1984 30 Day Post-General Report filed by the Democratic State Central Committee of Illinois-Federal Account ("the Committee") disclosed \$7,500 in excessive contributions to the Mayor Washington Federal Fund ("the Fund"). The report indicated that the Committee had made a \$5,000 contribution on October 24, 1984, another \$5,000 contribution on October 30, 1984, and a \$2,500 contribution on November 5, 1984 (Attachment 2).

A Request for Additional Information ("RFAI") was sent to the Committee on January 16, 1985 (Attachment 3, page 3). The RFAI advised the Committee that the Act precluded a committee from making contributions to another political committee in excess of \$5,000 per calendar year. The Committee was instructed to notify the recipient and request a refund of the amount in excess of \$5,000, and to provide the Commission with a photocopy of the refund request.

A response indicating that the Committee had received a refund of \$7,500 from the Fund on January 24, 1985 was received from Gerald R. Statza, Counsel for the Illinois Democratic Party, on January 28, 1985 (Attachment 4). The response included copies of the refund request letter, a \$7,500 check from the Fund and the Committee's deposit slip (Attachments 5 and 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

Attachment 1

①

* The Committee's Amended 1984 30 Day Post-General Report changed the address from 534 South Second Street, Springfield, IL 62701 to the above.

3 5 0 4 0 5 7 1 7 4 7 COMMITTEE REPORT OF THE GENERAL ACCOUNT

DATE: 1/1/84
 PAGE: 1

PARTY RELATED

COMMITTEE	DATE	NOTES	DEBIT	CREDIT	DATE	FILE	DATE	FILE	LOCATION
DEMOCRATIC PARTY	GENERAL COMMITTEE OF ILLINOIS (GENERAL ACCOUNT)								
1983	STATEMENT OF ORGANIZATION								
	MID-YEAR REPORT	31,810	9,260		11/1/83	30JUN83	2	84FEC/357/11219	
	MID-YEAR REPORT - AMENDMENT	31,860	9,260		11/1/83	30JUN83	3	84FEC/357/11219	
	MID-YEAR REPORT - AMENDMENT	31,860	9,260		11/1/83	30JUN83	4	84FEC/357/11219	
	REQUEST FOR ADDITIONAL INFORMATION				11/1/83	30JUN83	5	84FEC/357/11219	
	YEAR-END	850	15,370		11/1/83	31DEC83	6	84FEC/357/11219	
	YEAR-END - AMENDMENT	850	15,370		11/1/83	31DEC83	7	84FEC/357/11219	
	YEAR-END - AMENDMENT				11/1/83	31DEC83	8	84FEC/357/11219	
	REQUEST FOR ADDITIONAL INFORMATION				11/1/83	31DEC83	9	84FEC/357/11219	
1984	PRE-PRIMARY	0	7,731		11/1/84	30FEB84	1	84FEC/357/11219	
	PRE-PRIMARY - AMENDMENT	0	7,731		11/1/84	30FEB84	2	84FEC/357/11219	
	PRE-PRIMARY - AMENDMENT	0	7,731		11/1/84	30FEB84	3	84FEC/357/11219	
	REQUEST FOR ADDITIONAL INFORMATION				11/1/84	30FEB84	4	84FEC/357/11219	
	APRIL QUARTERLY	0	0		11/1/84	31MAR84	5	84FEC/357/11219	
	JULY QUARTERLY	1,000	6		11/1/84	30JUN84	6	84FEC/357/11219	
	JULY QUARTERLY - AMENDMENT	1,000	0		11/1/84	30JUN84	7	84FEC/357/11219	
	OCTOBER QUARTERLY	26,800	8,647		11/1/84	30SEP84	8	84FEC/357/11219	
	OCTOBER QUARTERLY	26,800	8,647		11/1/84	30SEP84	9	84FEC/357/11219	
	REQUEST FOR ADDITIONAL INFORMATION				11/1/84	30SEP84	10	84FEC/357/11219	
	PRE-GENERAL	22,500	22,591		11/1/84	17OCT84	11	84FEC/357/11219	
	PRE-GENERAL - AMENDMENT	22,500	22,591		11/1/84	17OCT84	12	84FEC/357/11219	
	PRE-GENERAL - AMENDMENT				11/1/84	17OCT84	13	84FEC/357/11219	
	REQUEST FOR ADDITIONAL INFORMATION				11/1/84	17OCT84	14	84FEC/357/11219	
	POST-GENERAL	136,800	140,450		11/1/84	26NOV84	15	84FEC/357/11219	
	POST-GENERAL - AMENDMENT	136,800	140,450		11/1/84	26NOV84	16	84FEC/357/11219	
	POST-GENERAL - AMENDMENT				11/1/84	26NOV84	17	84FEC/357/11219	
	POST-GENERAL - AMENDMENT	136,800	140,450		11/1/84	26NOV84	18	84FEC/357/11219	
	POST-GENERAL - AMENDMENT	136,800	140,450		11/1/84	26NOV84	19	84FEC/357/11219	
	REQUEST FOR ADDITIONAL INFORMATION				11/1/84	26NOV84	20	84FEC/357/11219	
	REQUEST FOR ADDITIONAL INFORMATION END				11/1/84	26NOV84	21	84FEC/357/11219	
	YEAR-END	987	5,302		11/1/84	27NOV84	22	84FEC/357/11219	
	YEAR-END - AMENDMENT				11/1/84	27NOV84	23	84FEC/357/11219	
	LETTER INFORMATIONAL NOTICE				11/1/84	27NOV84	24	84FEC/357/11219	
	TOTAL	2,477	0	2,477			148	TOTAL PAGES	

Outstanding debts owed to the Committee: \$0
 Outstanding debts owed by the Committee: \$0
 Ending cash on hand as of 12/31/84: \$11,316.44
 All reports have been reviewed

SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such contributors.

Name of Committee (in Full)

Democratic State Central Committee of Illinois

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement contribution	Date (month, day, year)	Amount of Each Disbursement This Period
Bruce for Congress P.O. Box 206 Olney, IL 62450	Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	11/1/84	3000.
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement contribution	Date (month, day, year)	Amount of Each Disbursement This Period
Simon for Senate 30 W. Washington Chicago, IL 60602	Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	10/18/84	1500.
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement GOTV (exempt)	Date (month, day, year)	Amount of Each Disbursement This Period
Washington Federal Fund Rm. 100, City Hall Chicago, IL 60602	Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	10/24/84 10/30/84	5000. 5000.
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement GOTV	Date (month, day, year)	Amount of Each Disbursement This Period
People for Perry 743 E. 103rd St. Chicago, IL 60628	Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	11/5/84	1000.
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement GOTV	Date (month, day, year)	Amount of Each Disbursement This Period
Citizens for Tilman 4650 S. King Dr. Chicago, IL 60615	Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	11/5/84	1000.
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement GOTV (exempt)	Date (month, day, year)	Amount of Each Disbursement This Period
Washington Federal Fund City Hall, Rm. 100 Chicago, IL 60602	Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	11/5/84	2500.
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement GOTV	Date (month, day, year)	Amount of Each Disbursement This Period
1984 Independent Campaign Committee 1356 E. Hyde Park Chicago, IL 60615	Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	11/5/84	1000.
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			20,000.00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

JAN 16 1985

Joseph Griffin, Treasurer
Democratic State Central
Committee of Illinois
(Federal Account)
534 South Second Street
Springfield, IL 62701

Identification Number: C00167015

Reference: 30 Day Post-General Report (10/18/84-11/26/84)

Dear Mr. Griffin:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The total amount of contributions itemized on Schedule A, plus the total amount of unitemized contributions reported on the Detailed Summary Page, should equal the total reported on Line 11(a) of the Detailed Summary Page. Please amend either Schedule A or the Detailed Summary figures to correct this discrepancy. 11 CFR 104.3(a).

-The total listed on Line 11(a), Column B of the Detailed Summary Page appears to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Line 11(a), Column B total.

-Schedule A of your report (pertinent portion(s) attached) discloses contributions from organizations which are not political committees registered with the Commission. Under 11 CFR 102.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

Please clarify whether the contributions received from these organizations are permissible, as required by 11

DEMOCRATIC STATE CENTRAL COMMITTEE
OF ILLINOIS (FEDERAL ACCOUNT)
PAGE 2

CFR 102.5(a). To the extent that your committee has received funds which are not permissible, the amounts should be either refunded to the organizations or transferred out to a non-Federal account. Please inform the Commission in writing and provide a photocopy of your check(s) for the refund(s) or transfer(s)-out. Contributions which are refunded should be disclosed on Schedule B for Line 26a of your next report; those which are transferred-out should be disclosed on Schedule B for Line 20 or Line 27, as appropriate.

-Your report discloses transfers made to the Democratic State Central Committee of Illinois State Account which appears to be the non-Federal account of your committee. Please note that if any portion of such transfers/payments represents reimbursements of administrative expenses pursuant to 11 CFR 106.1, such reimbursements should be reported on Schedule B supporting Line 19 of the Detailed Summary Page for Operating Expenditures. Administrative expenses are those day-to-day expenses of operating the committee, including rent, utilities, salaries, office supplies and other miscellaneous costs. The Federal account must pay its share of such costs.

If these transfers do not represent reimbursements of administrative expenses, please be advised that you must allocate such expenses between your Federal and non-Federal accounts in proportion to the amount of funds expended on Federal and non-Federal elections, or on another reasonable basis. 11 CFR 106.1(e) and 102.5(a)(1).

If your organization has incurred such administrative costs and your non-Federal account has paid for all such costs, your Federal account must reimburse the non-Federal account for its portion of the expenses. The amount incurred by the Federal account should be disclosed as a debt or obligation owed to the non-Federal account on Schedule D supporting Line 10 of the Summary Page. When payments are made toward the debt, they should be reported on Schedule B supporting Line 19 of the Detailed Summary Page and the debt should be reduced by a corresponding amount.

DEMOCRATIC STATE CENTRAL COMMITTEE
OF ILLINOIS (FEDERAL ACCOUNT)
PAGE 3

-According to 11 CFR 104.3(b)(3)(B), the terms "voter registration" and "get-out-the-vote" are not adequate to describe the purpose of expenditures. Please provide a statement or description which clarifies such expenditures. In addition, if any of the voter registration or get-out-the-vote activities referenced House or Senate candidates, they should be allocated accordingly, unless merely incidental to the overall activity. If a portion or all of these expenditures were made on behalf of Federal candidates, they should be reported on Schedule B or F for Line 21 or 23 of the Detailed Summary Page, as appropriate.

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from making contributions to another political committee in excess of \$5,000 per calendar year. (2 U.S.C. §441a(a)) If you have made an excessive contribution, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$5,000. Please inform the Commission immediately in writing of the refund and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on Line 16 of Schedule A of your next report.

If the contribution(s) in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the excessive contribution(s), your prompt action in obtaining a refund of the excessive amount will be taken into consideration.

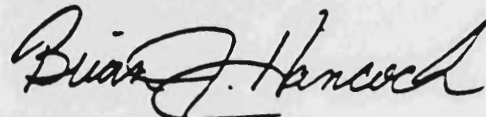
-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B of your report to clarify the following descriptions: contractual services, wired \$ for GOTV. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR 104.3(b)(3).

DEMOCRATIC STATE CENTRAL COMMITTEE
OF ILLINOIS (FEDERAL ACCOUNT)
PAGE 4

-Please clarify all expenditures made for brochures, posters, and Torchlight Parade/transfer for radio ads. If a portion or all of these expenditures were made on behalf of specifically identified Federal candidates, they should be disclosed on Schedule B or F for Line 21 or 23 and include the amount, name, address and office sought by each candidate. 11 CFR 104.3(b) and 106.1.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Brian J. Hancock
Reports Analyst
Reports Analysis Division

**Democratic
State Central Committee
of Illinois**

85 JAN 28 P 2: 22

634 South Second Street
Springfield, Illinois 62701
217/428-3471

171 West Randolph, Room 801
Chicago, Illinois 60601
312/372-1181

Calvin R. Suttler
Chairman

January 24, 1985

Mr. Brian Hancock
Reports Analyst
Federal Election Commission
Washington, D.C. 20463

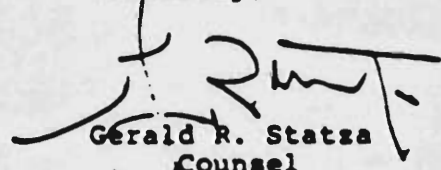
Re: Illinois Democratic Party, 30 day post-general report
objections /C00167015

Dear Mr. Hancock:

Pursuant to your letter dated January 16, 1985 regarding the above report, we have moved immediately to refund our Federal Account by reimbursement from the Washington Federal Fund. Enclosed is a copy of our refund request and the check and bank deposit receipt from the Washington Federal Fund reimbursement.

Your other objections to the above report shall be addressed within the time specified. Thanking you in advance for your co-operation, I remain,

Sincerely,


Gerald R. Statza
Counsel
Illinois Democratic Party

GRS/lk

**Democratic
State Central Committee
of Illinois**

Attachment 5

834 South Second Street
Springfield, Illinois 62701
217/252-3471

171 West Randolph, Room 801
Chicago, Illinois 60601
312/372-1181

Carol R. Butler
Chairman

January 24, 1985

Mr. Robert Hallock
Treasurer, Washington Federal Fund
Rm. 100, City Hall
Chicago, Illinois 60602

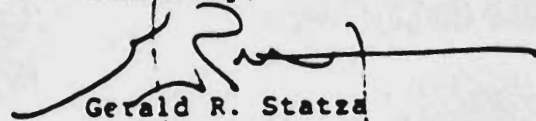
Re: Illinois Democratic Party 30 day post-general report
/C000167015

Dear Mr. Hallock:

The Federal Election Commission has reviewed the above report and has found an excess amount of contributions from the Illinois Democratic Party Federal Account to the Washington Federal Fund for 1984. Therefore, we must hereby request an immediate re-imbursement to the Illinois Democratic Party Federal funds of \$7500.00, which represents said contributions in excess of the limits set forth in the Federal Campaign Laws Act.

A copy of this letter and your check will be forwarded to the F.E.C. so they may conclude this objection. Thanking you in advance for your cooperation, I remain,

Sincerely,



Gerald R. Statza
Counsel
Illinois Democratic Party

GRS/lk

1/24 #85

Check and other items returned for deposit upon the terms and conditions of the account agreement and subject to financial institution deposited in

From the Chicago Fund

JAN 24 1985

PLEASE PRINT MAILING ADDRESS IF NOT SHOWN BELOW

DEMOCRATIC STATE CENTRAL COMMITTEE OF ILLINOIS
171 W. MADISON ST. SUITE 201
CHICAGO, IL 60602

CHECKS

7500.00

TOTAL OTHER	
TOTAL ABOVE CHECKS	7500.00
TOTAL FROM REVERSE SIDE	
CURRENCY	
COIN	
TOTAL DEPOSIT	7500.00

SPACE FOR ADDITIONAL LISTINGS ON REVERSE SIDE

⑆0071000547⑆

2 056612⑆

00

MAYOR WASHINGTON FUND
FEDERAL ACCOUNT

1006

JANUARY 24 1985

2-422
710PAY TO THE
ORDER OF

DEMOCRATIC STATE CENTRAL COMMITTEE OF ILLINOIS

\$ 7500.00

SEVEN THOUSAND FIVE HUNDRED DOLLARS AND 00/100

DOLLARS

South Shore Bank
Chicago, Illinois 60649

⑆001006⑆ ⑆0071004226⑆ ⑆551 785 2⑆

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 27 March 1985

ANALYST: Brian J. Hancock

I. COMMITTEE: Mayor Washington Federal Fund
(C00178525)
Robert W. Hallock, Treasurer
(January 29, 1985-present)
Kenneth Glover, Treasurer
(March 5, 1984-January 29, 1985)
127 North Dearborn Street, #638
Chicago, IL 60602

II. RELEVANT STATUTE: 2 U.S.C. §441a(f)

III. BACKGROUND:

Receipt of Excessive Contributions

The 1984 30 Day Post-General Report of the Mayor Washington Federal Fund ("the Fund") disclosed a total of \$7,500 in excessive contributions from the Democratic State Central Committee of Illinois-Federal Account ("the Committee"). The report indicated that the Fund received a \$5,000 contribution on October 25, 1984, another \$5,000 contribution on October 31, 1984 and a \$2,500 contribution on November 5, 1984 (Attachment 2).

A Request for Additional Information ("RFAI") was sent to the Fund on January 16, 1985 (Attachment 3). The RFAI advised the Fund that the Act precluded a committee from receiving contributions from another political committee or a person in excess of \$5,000 per calendar year. The Fund was asked to either refund or transfer-out the amount in excess of \$5,000.

On January 28, 1985, the Commission received a letter from Gerald R. Statza, Counsel to the Illinois Democratic Party, stating that the Committee had received a refund of \$7,500 from the Fund on January 24, 1985 (Attachment 4). The response included photocopies of the refund request letter, the check from the Fund, and the Committee's deposit slip (Attachments 5 and 6).

A Second Notice was sent to the Fund on February 7, 1985, acknowledging that the amount in excess had been returned (Attachment 7).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS (C) (83-84)

DATE 15MAY85
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
MAYOR WASHINGTON FEDERAL FUND						NON-PARTY NON-QUALIFIED ID #C00178525
1984	REQUEST FOR ADDITIONAL INFORMATION					1 84FEC/306/3230
	STATEMENT OF ORGANIZATION			5MAR84		3 84FEC/297/4880
	STATEMENT OF ORGANIZATION - AMENDMENT			7MAY84		3 84FEC/313/3315
	REQUEST FOR ADDITIONAL INFORMATION 2ND					2 84FEC/311/2818
	APRIL QUARTERLY	3,400	3,400	1JAN84 -31MAR84		9 84FEC/310/0677
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31MAR84		2 85FEC/359/5486
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN84 -31MAR84		1 85FEC/365/3934
	JULY QUARTERLY	25,600	8,217	1APR84 -30JUN84		13 84FEC/321/0977
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 -30JUN84		2 85FEC/359/5489
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR84 -30JUN84		1 85FEC/365/3933
	OCTOBER QUARTERLY	16,350	30,189	1JUL84 -30SEP84		11 84FEC/341/2350
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 -30SEP84		1 85FEC/360/1301
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL84 -30SEP84		1 85FEC/365/3932
	PRE-GENERAL	500	1,300	1OCT84 -17OCT84		11 84FEC/344/5484
	REQUEST FOR ADDITIONAL INFORMATION			1OCT84 -17OCT84		2 85FEC/359/5483
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT84 -17OCT84		7 85FEC/365/3194
	POST-GENERAL	16,000	3,625	18OCT84 -26NOV84		13 84FEC/353/5013
	POST-GENERAL - AMENDMENT	16,000	3,625	18OCT84 -26NOV84		14 84FEC/356/0241
	REQUEST FOR ADDITIONAL INFORMATION			18OCT84 -26NOV84		4 85FEC/359/5492
	REQUEST FOR ADDITIONAL INFORMATION 2ND			18OCT84 -26NOV84		1 85FEC/365/3184
	YEAR-END	0	5,346	27NOV84 -31DEC84		9 85FEC/363/0068
	REQUEST FOR ADDITIONAL INFORMATION			27NOV84 -31DEC84		2 85FEC/367/0928
	TOTAL	61,850	0	52,077	0	113 TOTAL PAGES

All reports have been reviewed.
Ending Cash (12/31/84) = \$9,771
Debts Owed By (12/31/84) = \$15,039
Debts Owed to (12/31/84) = \$0

9 6 0 4 0 3 7 1 7 5 8

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (15-36)

DATE 22MAR85
PAGE 1

NON PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
MAYOR WASHINGTON FEDERAL FUND						
CONNECTED ORGANIZATION:	BLANK					
	1985 STATEMENT OF ORGANIZATION - AMENDMENT			29JAN85	2	HOPEC/36370
	TOTAL	0	0	0	2	TOTAL PAGES

NON-PARTY NON-QUALIFIED ID #C00170535

1984 30 Day Post-General Report

Attachment 2

Page 1 of 1
LINE NUMBER 22
These spaces are reserved for the category of the Code on Summary Page.

SCHEDULE A

ITEMIZED RECEIPTS

Any information covered from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

MAYOR WASHINGTON FEDERAL FUND

A. Full Name, Mailing Address and ZIP Code

ILLINOIS DEMOCRATIC STATE
CENTRAL COMMITTEE
171 WEST RANDOLPH STREET SUITE # 501
CHICAGO, ILLINOIS 60602

Receipt For ☐ Primary ☒ General
☐ Other (specify)

Name of Employer

NAME

Date (month,
day, year)

10-25-84

10-31-84

11-05-84

Amount of Each
Receipt This Period

5,000.00

5,000.00

2,500.00

Occupation

POLITICAL FUND

Aggregate Year-to-Date - \$ 12,500.00

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)

Amount of Each
Receipt This Period

Occupation

Aggregate Year-to-Date - \$

Receipt For ☐ Primary ☐ General
☐ Other (specify)

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)

Amount of Each
Receipt This Period

Occupation

Aggregate Year-to-Date - \$

Receipt For ☐ Primary ☐ General
☐ Other (specify)

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)

Amount of Each
Receipt This Period

Occupation

Aggregate Year-to-Date - \$

Receipt For ☐ Primary ☐ General
☐ Other (specify)

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)

Amount of Each
Receipt This Period

Occupation

Aggregate Year-to-Date - \$

Receipt For ☐ Primary ☐ General
☐ Other (specify)

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)

Amount of Each
Receipt This Period

Occupation

Aggregate Year-to-Date - \$

Receipt For ☐ Primary ☐ General
☐ Other (specify)

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)

Amount of Each
Receipt This Period

Occupation

Aggregate Year-to-Date - \$

Receipt For ☐ Primary ☐ General
☐ Other (specify)

94033160243

14



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543



EQ-2

JAN 16 1985

Kenneth Glover, Treasurer
Mayor Washington Federal Fund
127 North Dearborn Street, #638
Chicago, IL 60602

Identification Number: C00178525

Reference: 30 Day Post-General Report (10/18/84-11/26/84)

Dear Mr. Glover:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from another political committee or a person in excess of \$5,000 per calendar year. (2 U.S.C. §441a(f)) The Illinois Democratic State Central Committee has not been identified as an affiliated committee on your committee's Statement of Organization. Additionally, the Illinois Democratic State Central Committee has not identified your committee as being affiliated. If you have received a contribution that exceeds the limits, the Commission recommends that you refund to the donor, or transfer-out to a non-Federal account, the amount in excess of \$5,000. Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In addition, the disbursement of the amount in excess should be disclosed on a supporting Schedule B for Line 26 or 27 of your next report.

If the contribution(s) in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your prompt refund or transfer-out of the excessive amount will be taken into consideration.

15

93033-9/547020

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 19 of the Detailed Summary Page. (2 U.S.C. §434(b)(5)) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty (60) days or more. 11 CFR 104.11.

If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2).

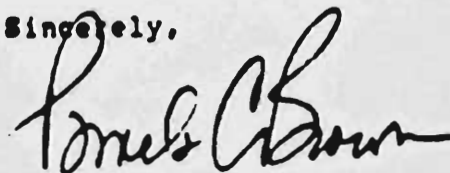
Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR 104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Please provide clarification regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission regulations.

-Please clarify the payment made to the Political Education Project disclosed on Schedule B for Line 21. If a portion or all of the payment were made on behalf of specifically identified Federal candidates, the payment must be allocated among the candidates to include the amount, name, address, and office sought by each candidate. (11 CFR 104.3(b) and 106.1)

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Pamela C. Brown
Senior Reports Analyst
Reports Analysis Division



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

February 7, 1985

Kenneth Glover, Treasurer
Mayor Washington Federal Fund
127 North Dearborn Street #638
Chicago, IL 60602

Identification Number: C00178525

Reference: 30 Day Post-General Report (10/18/84-11/26/84)

Dear Mr. Glover:

On January 16, 1985 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

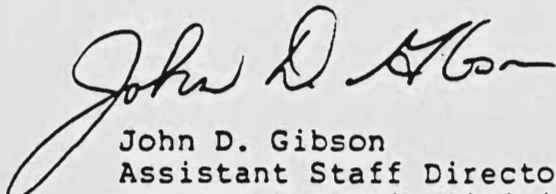
The Commission notes that you have sent to the Illinois Democratic State Central Committee the appropriate contribution refund. However, the following information is still required.

-Please clarify the payment made to the Political Education Project disclosed on Schedule B for Line 21. If a portion or all of the payment were made on behalf of specifically identified Federal candidates, the payment must be allocated among the candidates to include the amount, name, address, and office sought by each candidate. (11 CFR 104.3(b) and 106.1)

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Pamela Brown on our toll-free number (800) 424-9530 or our local number (202) 523-4048.

Sincerely,


John D. Gibson
Assistant Staff Director
Reports Analysis Division

17

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. _____

RESPONDENTS Democratic State Central Committee of Illinois-
Federal Account and Joseph Griffin, as treasurer

SUMMARY OF ALLEGATIONS

It is alleged that the Democratic State Central Committee of Illinois-Federal Account (the "Committee") and Joseph Griffin, as treasurer, violated 2 U.S.C. § 441a(a)(2)(C) by making excessive contributions to the Mayor Washington Federal Fund (the "Fund").

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 441a(a)(2)(C), a multicandidate political committee is prohibited from making contributions to a political committee, other than an authorized committee or a national political party committee, in any calendar year which, in the aggregate, exceed \$5,000. Pursuant to 2 U.S.C. § 441a(f), a political committee is prohibited from knowingly accepting a contribution in violation of section 441a. It is the Commission's interpretation that a contribution is "knowingly" accepted if the recipient knew that it received the contributions at issue. It is not necessary to a finding of knowing acceptance to show the recipient knew the contributions exceeded the limitations in violation of the law.

The 1984 30 Day Post-General Election Report filed by the Fund disclosed a total of \$7,500 in excessive contributions from the Committee. The report indicated that the Fund received from the Committee a \$5,000 contribution on October 25, 1984, another \$5,000 contribution on October 31, 1984, and a \$2,500

contribution on November 5, 1984. On its 30 Day Post-General Election Report the Committee reported the purpose of the \$12,500 to the Fund as "GOTV (exempt)," however, no further explanation has been offered regarding the purpose of the money.*/

Requests for Additional Information ("RAI") were sent to the Respondents on January 16, 1985, informing them of the possible violations of 2 U.S.C. § 441a and recommending appropriate refunds.

On January 28, 1985, the Commission received a letter from Gerald E. Statza, counsel to the Illinois Democratic Party, stating that the Committee had received a refund of \$7,500 from the Fund on January 24, 1985. The response included photocopies of the refund request letter, the check from the Fund, and the Committee's deposit slip.

A Second Notice was sent to the Fund on February 7, 1985, acknowledging that the amount in excess had been returned.

In light of the excessive contributions from the Committee to the Fund, the Office of the General Counsel recommends that the Commission open a MUR and find reason to believe that the Democratic State Central Committee of Illinois-Federal Account and Joseph Griffin, as treasurer, violated 2 U.S.C. § 441a(a)(2)(C).

*/ A check of the Fund's reports did not show any get-out-the-vote activity.

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. _____

RESPONDENTS Mayor Washington Federal Fund
Robert W. Hallock, as treasurer

SUMMARY OF ALLEGATIONS

It is alleged that the Mayor Washington Federal Fund (the "Fund") and Robert W. Hallock, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions from the Democratic State Central Committee of Illinois-Federal Account (the "Committee").

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 441a(a)(2)(C), a multicandidate political committee is prohibited from making contributions to a political committee, other than an authorized committee or a national political party committee, in any calendar year which, in the aggregate, exceed \$5,000. Pursuant to 2 U.S.C. § 441a(f), a political committee is prohibited from knowingly accepting a contribution in violation of section 441a. It is the Commission's interpretation that a contribution is "knowingly" accepted if the recipient knew that it received the contributions at issue. It is not necessary to a finding of knowing acceptance to show the recipient knew the contributions exceeded the limitations in violation of the law.

The 1984 30 Day Post-General Election Report filed by the Fund disclosed a total of \$7,500 in excessive contributions from the Committee. The report indicated that the Fund received from

the Committee a \$5,000 contribution on October 25, 1984, another \$5,000 contribution on October 31, 1984, and a \$2,500 contribution on November 5, 1984. On its 30 Day Post-General Election Report the Committee reported the purpose of the \$12,500 to the Fund as "GOTV (exempt)," however, no further explanation has been offered regarding the purpose of the money.*/

Requests for Additional Information ("RFAI") were sent to the Respondents on January 16, 1985, informing them of the possible violations of 2 U.S.C. § 441a and recommending appropriate refunds.

On January 28, 1985, the Commission received a letter from Gerald R. Statza, counsel to the Illinois Democratic Party, stating that the Committee had received a refund of \$7,500 from the Fund on January 24, 1985. The response included photocopies of the refund request letter, the check from the Fund, and the Committee's deposit slip.

A Second Notice was sent to the Fund on February 7, 1985, acknowledging that the amount in excess had been returned.

In light of the excessive contributions from the Committee to the Fund, the Office of the General Counsel recommends that the Commission open a MUR and find reason to believe that the Mayor Washington Federal Fund and Robert W. Hallock, as treasurer, violated 2 U.S.C. § 441a(f).

*/ A check of the Fund's reports did not show any get-out-the-vote activity.



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

Joseph Griffin, Treasurer
Democratic State Central Committee of
Illinois-Federal Account
134 North LaSalle, Suite 2126
Chicago, Illinois 60602

RE: MUR

Dear Mr. Griffin:

On , 1985, the Federal Election Commission determined that there is reason to believe the Democratic State Central Committee of Illinois-Federal Account and you, as treasurer, violated 2 U.S.C. § 441a(a)(2)(C), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Attachment 3

22

Joseph Griffin, Treasurer
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert W. Hallock, Treasurer
Mayor Washington Federal Fund
127 North Dearborn Street, #638
Chicago, Illinois 60602

RE: MUR

Dear Mr. Hallock:

On , 1985, the Federal Election Commission determined that there is reason to believe the Mayor Washington Federal Fund and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.13(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Robert W. Hallock, Treasurer
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

27 March 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE DEMOCRATIC STATE CENTRAL COMMITTEE
OF ILLINOIS-FEDERAL ACCOUNT

2604071771

This is the referral of the Democratic State Central Committee of Illinois-Federal Account ("the Committee"). During 1984, the Committee made excessive contributions to the Mayor Washington Federal Fund totalling \$7,500. Upon notification, the Committee received a refund of the amount in excess

For your information, a companion referral is also being submitted for the Mayor Washington Federal Fund.

If you have any questions on this matter, please contact Brian Hancock at 523-4048.

Attachment

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 27 March 1985

ANALYST: Brian J. Hancock

I. COMMITTEE: Democratic State Central Committee of
Illinois-Federal Account (C00167015)
Joseph Griffin, Treasurer
134 North LaSalle, Suite 2126*/
Chicago, IL 60602

II. RELEVANT STATUTE: 2 U.S.C. §441a(a)(2)(C)

III. BACKGROUND:

Excessive Contributions to a Political Committee

The 1984 30 Day Post-General Report filed by the Democratic State Central Committee of Illinois-Federal Account ("the Committee") disclosed \$7,500 in excessive contributions to the Mayor Washington Federal Fund ("the Fund"). The report indicated that the Committee had made a \$5,000 contribution on October 24, 1984, another \$5,000 contribution on October 30, 1984, and a \$2,500 contribution on November 5, 1984 (Attachment 2).

A Request for Additional Information ("RFAI") was sent to the Committee on January 16, 1985 (Attachment 3, page 3). The RFAI advised the Committee that the Act precluded a committee from making contributions to another political committee in excess of \$5,000 per calendar year. The Committee was instructed to notify the recipient and request a refund of the amount in excess of \$5,000, and to provide the Commission with a photocopy of the refund request.

A response indicating that the Committee had received a refund of \$7,500 from the Fund on January 24, 1985 was received from Gerald R. Statza, Counsel for the Illinois Democratic Party, on January 28, 1985 (Attachment 4). The response included copies of the refund request letter, a \$7,500 check from the Fund and the Committee's deposit slip (Attachments 5 and 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

*/ The Committee's Amended 1984 30 Day Post-General Report changed the address from 534 South Second Street, Springfield, IL 62701 to the above.

8 6 0 4 0 5 7 1 7 7 3
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (93-94)

DATE 26MAR85
PAGE 1

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILE COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
DEMOCRATIC STATE CENTRAL COMMITTEE OF ILLINOIS (FEDERAL ACCOUNT)				PARTY QUALIFIED		ID #C00162015
1983	STATEMENT OF ORGANIZATION			4MAY83	2	81FEC/271/2819
	MID-YEAR REPORT	9,360	9,360	15APR83 - 30JUN83	9	83FEC/279/5415
	MID-YEAR REPORT - AMENDMENT	9,360	9,360	15APR83 - 30JUN83	4	84FEC/293/3789
	MID-YEAR REPORT - AMENDMENT	9,360	9,360	15APR83 - 30JUN83	5	84FEC/357/5380
	REQUEST FOR ADDITIONAL INFORMATION			15APR83 - 30JUN83	5	84FEC/356/2991
	YEAR-END	850	15,370	1JUL83 - 31DEC83	7	84FEC/293/3792
	YEAR-END - AMENDMENT	850	15,370	1JUL83 - 31DEC83	4	84FEC/357/5389
	YEAR-END - AMENDMENT	-	-	1JUL83 - 31DEC83	1	85FEC/358/162
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 - 31DEC83	2	84FEC/356/2988
1984	PRE-PRIMARY	0	7,731	1JAN84 - 24FEB84	6	84FEC/247/5162
	PRE-PRIMARY - AMENDMENT	0	7,731	1JAN84 - 24FEB84	5	84FEC/310/0843
	PRE-PRIMARY - AMENDMENT	0	7,731	1JAN84 - 24FEB84	4	84FEC/357/5386
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 - 24FEB84	2	84FEC/357/1462
	APRIL QUARTERLY	0	0	1MAR84 - 31MAR84	3	84FEC/310/0840
	JULY QUARTERLY	1,000	6	1APR84 - 30JUN84	5	84FEC/323/0576
	JULY QUARTERLY - AMENDMENT	1,000	6	1APR84 - 30JUN84	3	84FEC/323/4995
	OCTOBER QUARTERLY	26,860	9,647	1JUL84 - 30SEP84	9	84FEC/341/3596
	OCTOBER QUARTERLY	26,860	9,647	1JUL84 - 30SEP84	9	84FEC/344/0612
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 - 30SEP84	3	84FEC/356/2997
	PRE-GENERAL	22,500	22,591	1OCT84 - 17OCT84	11	84FEC/346/2630
	PRE-GENERAL - AMENDMENT	22,500	22,591	1OCT84 - 17OCT84	3	84FEC/348/1374
	PRE-GENERAL - AMENDMENT	-	-	1OCT84 - 17OCT84	2	84FEC/357/5378
	REQUEST FOR ADDITIONAL INFORMATION			1OCT84 - 17OCT84	4	84FEC/356/3001
	POST-GENERAL	136,880	140,450	18OCT84 - 26NOV84	22	84FEC/354/1142
	POST-GENERAL - AMENDMENT	136,880	140,450	18OCT84 - 26NOV84	3	84FEC/357/0320
	POST-GENERAL - AMENDMENT	-	-	18OCT84 - 26NOV84	4	85FEC/362/0588
	POST-GENERAL - AMENDMENT	136,880	140,450	18OCT84 - 26NOV84	16	85FEC/365/1174
	POST-GENERAL - AMENDMENT	136,880	140,450	18OCT84 - 26NOV84	18	85FEC/367/3870
	REQUEST FOR ADDITIONAL INFORMATION			18OCT84 - 26NOV84	6	85FEC/360/001
	REQUEST FOR ADDITIONAL INFORMATION AND			18OCT84 - 26NOV84	3	85FEC/365/3948
	YEAR-END	987	5,362	27NOV84 - 31DEC84	7	85FEC/365/1190
	YEAR-END - AMENDMENT	-	-	27NOV84 - 31DEC84	2	85FEC/368/2389
	POST LETTER INFORMATIONAL NOTICE			27NOV84 - 31DEC84	1	85FEC/367/1238
	TOTAL	220,677	0	209,357	0	188 TOTAL PAGES

Outstanding debts owed to the Committee: \$0
Outstanding debts owed by the Committee: \$0
Ending cash on hand as of 12/31/84: \$11,316.44
All reports have been reviewed

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for
LINE NUMBER 21
(Use separate schedules for each
category of the Detailed
Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

Democratic State Central Committee of Illinois

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bruce for Congress P.O. Box 206 Olney, IL 62450	contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	11/1/84	3000.
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Simon for Senate 30 W. Washington Chicago, IL 60602	contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	10/18/84	1500.
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Washington Federal Fund Rm. 100, City Hall Chicago, IL 60602	GOTV (exempt) Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	10/24/84 10/30/84	5000. 5000.
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
People for Perry 743 E. 103rd St. Chicago, IL 60628	GOTV Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	11/5/84	1000.
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Citizens for Tillman 4650 S. King Dr. Chicago, IL 60615	GOTV Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	11/5/84	1000.
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Washington Federal Fund City Hall, Rm. 100 Chicago, IL 60602	GOTV (exempt) Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	11/5/84	2500.
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
1984 Independent Campaign Committee 1356 E. Hyde Park Chicago, IL 60615	GOTV Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	11/5/84	1000.
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			20,000.00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

JAN 16 1985

Joseph Griffin, Treasurer
Democratic State Central
Committee of Illinois
(Federal Account)
534 South Second Street
Springfield, IL 62701

Identification Number: C00167015

Reference: 30 Day Post-General Report (10/18/84-11/26/84)

Dear Mr. Griffin:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The total amount of contributions itemized on Schedule A, plus the total amount of unitemized contributions reported on the Detailed Summary Page, should equal the total reported on Line 11(a) of the Detailed Summary Page. Please amend either Schedule A or the Detailed Summary figures to correct this discrepancy. 11 CFR 104.3(a).

-The total listed on Line 11(a), Column B of the Detailed Summary Page appears to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Line 11(a), Column B total.

-Schedule A of your report (pertinent portion(s) attached) discloses contributions from organizations which are not political committees registered with the Commission. Under 11 CFR 102.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

Please clarify whether the contributions received from these organizations are permissible, as required by 11

DEMOCRATIC STATE CENTRAL COMMITTEE
OF ILLINOIS (FEDERAL ACCOUNT)
PAGE 2

CFR 102.5(a). To the extent that your committee has received funds which are not permissible, the amounts should be either refunded to the organizations or transferred out to a non-Federal account. Please inform the Commission in writing and provide a photocopy of your check(s) for the refund(s) or transfer(s)-out. Contributions which are refunded should be disclosed on Schedule B for Line 26a of your next report; those which are transferred-out should be disclosed on Schedule B for Line 20 or Line 27, as appropriate.

-Your report discloses transfers made to the Democratic State Central Committee of Illinois State Account which appears to be the non-Federal account of your committee. Please note that if any portion of such transfers/payments represents reimbursements of administrative expenses pursuant to 11 CFR 106.1, such reimbursements should be reported on Schedule B supporting Line 19 of the Detailed Summary Page for Operating Expenditures. Administrative expenses are those day-to-day expenses of operating the committee, including rent, utilities, salaries, office supplies and other miscellaneous costs. The Federal account must pay its share of such costs.

If these transfers do not represent reimbursements of administrative expenses, please be advised that you must allocate such expenses between your Federal and non-Federal accounts in proportion to the amount of funds expended on Federal and non-Federal elections, or on another reasonable basis. 11 CFR 106.1(e) and 102.5(a)(1).

If your organization has incurred such administrative costs and your non-Federal account has paid for all such costs, your Federal account must reimburse the non-Federal account for its portion of the expenses. The amount incurred by the Federal account should be disclosed as a debt or obligation owed to the non-Federal account on Schedule D supporting Line 10 of the Summary Page. When payments are made toward the debt, they should be reported on Schedule B supporting Line 19 of the Detailed Summary Page and the debt should be reduced by a corresponding amount.

DEMOCRATIC STATE CENTRAL COMMITTEE
OF ILLINOIS (FEDERAL ACCOUNT)
PAGE 3

-According to 11 CFR 104.3(b)(3)(B), the terms "voter registration" and "get-out-the-vote" are not adequate to describe the purpose of expenditures. Please provide a statement or description which clarifies such expenditures. In addition, if any of the voter registration or get-out-the-vote activities referenced House or Senate candidates, they should be allocated accordingly, unless merely incidental to the overall activity. If a portion or all of these expenditures were made on behalf of Federal candidates, they should be reported on Schedule B or F for Line 21 or 23 of the Detailed Summary Page, as appropriate.

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from making contributions to another political committee in excess of \$5,000 per calendar year. (2 U.S.C. §441a(a)) If you have made an excessive contribution, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$5,000. Please inform the Commission immediately in writing of the refund and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on Line 16 of Schedule A of your next report. B.W.

If the contribution(s) in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the excessive contribution(s), your prompt action in obtaining a refund of the excessive amount will be taken into consideration.

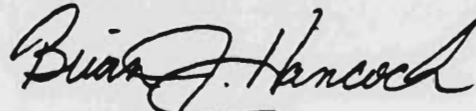
-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B of your report to clarify the following descriptions: contractual services, wired \$ for GOTV. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR 104.3(b)(3).

DEMOCRATIC STATE CENTRAL COMMITTEE
OF ILLINOIS (FEDERAL ACCOUNT)
PAGE 4

-Please clarify all expenditures made for brochures, posters, and Torchlight Parade/transfer for radio ads. If a portion or all of these expenditures were made on behalf of specifically identified Federal candidates, they should be disclosed on Schedule B or F for Line 21 or 23 and include the amount, name, address and office sought by each candidate. 11 CFR 104.3(b) and 106.1.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Brian J. Hancock
Reports Analyst
Reports Analysis Division

**Democratic
State Central Committee
of Illinois**

85 JAN 28 P 2: 22

884 South Second Street
Springfield, Illinois 62761
217/259-3471

171 West Randolph, Room 801
Chicago, Illinois 60601
312/372-1181

Calvin R. Suttler
Chairman

January 24, 1985

Mr. Brian Hancock
Reports Analyst
Federal Election Commission
Washington, D.C. 20463

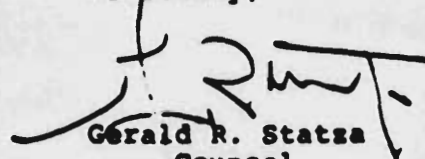
Re: Illinois Democratic Party, 30 day post-general report
objections /C00167015

Dear Mr. Hancock:

Pursuant to your letter dated January 16, 1985 regarding the above report, we have moved immediately to refund our Federal Account by reimbursement from the Washington Federal Fund. Enclosed is a copy of our refund request and the check and bank deposit receipt from the Washington Federal Fund reimbursement.

Your other objections to the above report shall be addressed within the time specified. Thanking you in advance for your co-operation, I remain,

Sincerely,



Gerald R. Statsa
Counsel
Illinois Democratic Party

GRS/lk

**Democratic
State Central Committee
of Illinois**

Attachment 5

834 South Second Street
Springfield, Illinois 62761
217/252-3471

171 West Randolph Room 801
Chicago, Illinois 60601
312/372-1101

Carol A. Butler
Chairman

January 24, 1985

Mr. Robert Hallock
Treasurer, Washington Federal Fund
Rm. 100, City Hall
Chicago, Illinois 60602

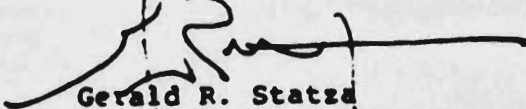
Re: Illinois Democratic Party 30 day post-general report
/C000167015

Dear Mr. Hallock:

The Federal Election Commission has reviewed the above report and has found an excess amount of contributions from the Illinois Democratic Party Federal Account to the Washington Federal Fund for 1984. Therefore, we must hereby request an immediate re-imbursement to the Illinois Democratic Party Federal funds of \$7500.00, which represents said contributions in excess of the limits set forth in the Federal Campaign Laws Act.

A copy of this letter and your check will be forwarded to the F.E.C. so they may conclude this objection. Thanking you in advance for your cooperation, I remain,

Sincerely,


Gerald R. Statza
Counsel
Illinois Democratic Party

GRS/lk

930333320518792

124 85

Check and other items are returned for deposit upon the terms and conditions of the account agreement and subject to checkbook verification DEPOSITED IN

From the checkbook of the donor

JAN 24 1985

PLEASE PRINT MAILING ADDRESS IF NOT SHOWN BELOW

DEMOCRATIC STATE CENTRAL COMMITTEE OF ILLINOIS
171 W. MADISON, SUITE 201
CHICAGO, IL 60602

CHECKS	7500.00
TOTAL OTHER	
TOTAL ABOVE CHECKS	7500.00
TOTAL FROM REVERSE SIDE	
CURRENCY	
COIN	
TOTAL DEPOSIT	7500.00

SPACE FOR ADDITIONAL LISTINGS ON REVERSE SIDE

•C0710005471:

2 0566121 00

MAYOR WASHINGTON FUND
FEDERAL ACCOUNT

1006

JANUARY 24 1985

2-422
718PAY TO THE
ORDER OF

DEMOCRATIC STATE CENTRAL COMMITTEE OF ILLINOIS

\$ 7500.00

SEVEN THOUSAND FIVE HUNDRED DOLLARS AND 00/100

DOLLARS


South Shore Bank
Chicago, Illinois 60640

⑈001006⑈ ⑈071004226⑈ ⑈551 785 2⑈



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

27 March 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF MAYOR WASHINGTON FEDERAL FUND

This is a referral of the Mayor Washington Federal Fund ("the Fund"). During 1984, the Fund accepted excessive contributions totalling \$7,500 from the Democratic State Central Committee of Illinois-Federal Account. Upon notification, the Fund returned the amount in excess.

For your information, a companion referral is also being submitted for the Democratic State Central Committee of Illinois-Federal Account.

If you have any questions on this matter, please contact Brian Hancock at 523-4048.

Attachment

160400:1782

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 27 March 1985

ANALYST: Brian J. Hancock

I. COMMITTEE: Mayor Washington Federal Fund
(C00178525)
Robert W. Hallock, Treasurer
(January 29, 1985-present)
Kenneth Glover, Treasurer
(March 5, 1984-January 29, 1985)
127 North Dearborn Street, #638
Chicago, IL 60602

II. RELEVANT STATUTE: 2 U.S.C. §441a(f)

III. BACKGROUND:

Receipt of Excessive Contributions

The 1984 30 Day Post-General Report of the Mayor Washington Federal Fund ("the Fund") disclosed a total of \$7,500 in excessive contributions from the Democratic State Central Committee of Illinois-Federal Account ("the Committee"). The report indicated that the Fund received a \$5,000 contribution on October 25, 1984, another \$5,000 contribution on October 31, 1984 and a \$2,500 contribution on November 5, 1984 (Attachment 2).

A Request for Additional Information ("RFAI") was sent to the Fund on January 16, 1985 (Attachment 3). The RFAI advised the Fund that the Act precluded a committee from receiving contributions from another political committee or a person in excess of \$5,000 per calendar year. The Fund was asked to either refund or transfer-out the amount in excess of \$5,000.

On January 28, 1985, the Commission received a letter from Gerald R. Statza, Counsel to the Illinois Democratic Party, stating that the Committee had received a refund of \$7,500 from the Fund on January 24, 1985 (Attachment 4). The response included photocopies of the refund request letter, the check from the Fund, and the Committee's deposit slip (Attachments 5 and 6).

A Second Notice was sent to the Fund on February 7, 1985, acknowledging that the amount in excess had been returned (Attachment 7).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS (C) (83-84)

DATE 15MAR85
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
MAYOR WASHINGTON FEDERAL FUND				NON-PARTY NON-QUALIFIED	ID #C00178525	
1984	REQUEST FOR ADDITIONAL INFORMATION					1 84FEC/306/3230
	STATEMENT OF ORGANIZATION			5MAR84	3	84FEC/297/4880
	STATEMENT OF ORGANIZATION - AMENDMENT			7MAY84	3	84FEC/313/3315
	REQUEST FOR ADDITIONAL INFORMATION 2ND				2	84FEC/311/2818
	APRIL QUARTERLY	3,400	3,400	1JAN84 -31MAR84	9	84FEC/310/0677
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31MAR84	2	85FEC/359/5486
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN84 -31MAR84	1	85FEC/365/3934
	JULY QUARTERLY	25,600	8,217	1APR84 -30JUN84	13	84FEC/321/0973
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 -30JUN84	2	85FEC/359/5489
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR84 -30JUN84	1	85FEC/365/3933
	OCTOBER QUARTERLY	16,350	30,189	1JUL84 -30SEP84	11	84FEC/341/2350
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 -30SEP84	1	85FEC/360/1301
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL84 -30SEP84	1	85FEC/365/3932
	PRE-GENERAL	500	1,300	1OCT84 -17OCT84	11	84FEC/344/5484
	REQUEST FOR ADDITIONAL INFORMATION			1OCT84 -17OCT84	2	85FEC/359/5483
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT84 -17OCT84	7	85FEC/365/3194
	POST-GENERAL	16,000	3,625	18OCT84 -26NOV84	13	84FEC/353/5013
	POST-GENERAL - AMENDMENT	16,000	3,625	18OCT84 -26NOV84	14	84FEC/356/0241
	REQUEST FOR ADDITIONAL INFORMATION			18OCT84 -26NOV84	4	85FEC/359/5492
	REQUEST FOR ADDITIONAL INFORMATION 2ND			18OCT84 -26NOV84	1	85FEC/365/3184
	YEAR-END	0	5,346	27NOV84 -31DEC84	9	85FEC/363/0068
	REQUEST FOR ADDITIONAL INFORMATION			27NOV84 -31DEC84	2	85FEC/367/0928
	TOTAL	61,850	0	52,077	0	113 TOTAL PAGES

All reports have been reviewed.
Ending Cash (12/31/84) = \$9,771
Debts Owed By (12/31/84) = \$15,039
Debts Owed to (12/31/84) = \$0

8 6 0 4 0 7 1 7 3 3

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS (C) (B) (S)

DATE 27MAR85
PAGE 1

NON PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
MAYOR WASHINGTON FEDERAL FUND						
CONNECTED ORGANIZATION:	BLANK					
	1985 STATEMENT OF ORGANIZATION AMENDMENT			29JAN85	2	85FEC/363/0
	TOTAL	0	0	0	2	TOTAL PAGES

NON-PARTY NON-QUALIFIED ID #808178928

1984 30 Day Post-General Report

Attachment 2

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 1 for
LINE NUMBER 001
This schedule is for the
category of the Code on
Summary Page:

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

MAYOR WASHINGTON FEDERAL FUND

A. Full Name, Mailing Address and ZIP Code

ILLINOIS DEMOCRATIC STATE
CENTRAL COMMITTEE
171 WEST RANDOLPH STREET SUITE # 501
CHICAGO, ILLINOIS 60602

Name of Employer

SAFE

Date (month,

day, year)

10-25-84

10-31-84

11-05-84

Amount of Each

Receipt This Period

5,000.00

5,000.00

2,500.00

Occupation

POLITICAL FUND

Aggregate Year-to-Date - \$

12,500.00

Receipt For

☐ Primary

☒ General

☐ Other (specify)

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,

day, year)

Amount of Each

Receipt This Period

Occupation

Aggregate Year-to-Date - \$

Receipt For

☐ Primary

☐ General

☐ Other (specify)

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,

day, year)

Amount of Each

Receipt This Period

Occupation

Aggregate Year-to-Date - \$

Receipt For

☐ Primary

☐ General

☐ Other (specify)

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,

day, year)

Amount of Each

Receipt This Period

Occupation

Aggregate Year-to-Date - \$

Receipt For

☐ Primary

☐ General

☐ Other (specify)

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,

day, year)

Amount of Each

Receipt This Period

Occupation

Aggregate Year-to-Date - \$

Receipt For

☐ Primary

☐ General

☐ Other (specify)

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,

day, year)

Amount of Each

Receipt This Period

Occupation

Aggregate Year-to-Date - \$

Receipt For

☐ Primary

☐ General

☐ Other (specify)

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,

day, year)

Amount of Each

Receipt This Period

Occupation

Aggregate Year-to-Date - \$

Receipt For

☐ Primary

☐ General

☐ Other (specify)

H. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,

day, year)

Amount of Each

Receipt This Period

Occupation

Aggregate Year-to-Date - \$

Receipt For

☐ Primary

☐ General

☐ Other (specify)

94033760245



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

80-2

JAN 16 1985

**Kenneth Glover, Treasurer
Mayor Washington Federal Fund
127 North Dearborn Street, #638
Chicago, IL 60602**

Identification Number: C00178525

Reference: 30 Day Post-General Report (10/18/84-11/26/84)

Dear Mr. Glover:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from another political committee or a person in excess of \$5,000 per calendar year. (2 U.S.C. §441a(f)) The Illinois Democratic State Central Committee has not been identified as an affiliated committee on your committee's Statement of Organization. Additionally, the Illinois Democratic State Central Committee has not identified your committee as being affiliated. If you have received a contribution that exceeds the limits, the Commission recommends that you refund to the donor, or transfer-out to a non-Federal account, the amount in excess of \$5,000. Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In addition, the disbursement of the amount in excess should be disclosed on a supporting Schedule B for Line 26 or 27 of your next report.

If the contribution(s) in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your prompt refund or transfer-out of the excessive amount will be taken into consideration.

95033-93402

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 19 of the Detailed Summary Page. (2 U.S.C. §434(b)(5)) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty (60) days or more. 11 CFR 104.11.

If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2).

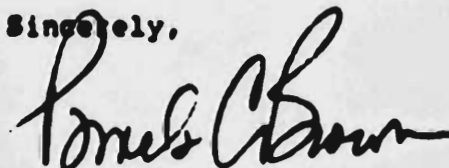
Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR 104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Please provide clarification regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission regulations.

-Please clarify the payment made to the Political Education Project disclosed on Schedule B for Line 21. If a portion or all of the payment were made on behalf of specifically identified Federal candidates, the payment must be allocated among the candidates to include the amount, name, address, and office sought by each candidate. (11 CFR 104.3(b) and 106.1)

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Pamela C. Brown
Senior Reports Analyst
Reports Analysis Division

93033:95403

**Democratic
State Central Committee
of Illinois**

85 JAN 28 P 2: 22

884 South Second Street
Springfield, Illinois 62701
217/688-3471

171 West Randolph, Room 801
Chicago, Illinois 60601
312/372-1161

Calvin R. Sutter
Chairman

January 24, 1985

Mr. Brian Hancock
Reports Analyst
Federal Election Commission
Washington, D.C. 20463

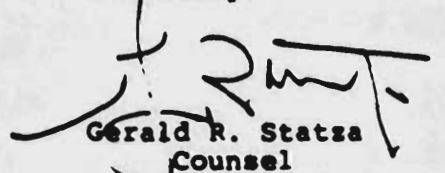
Re: Illinois Democratic Party, 30 day post-general report
objections /C00167015

Dear Mr. Hancock:

Pursuant to your letter dated January 16, 1985 regarding the above report, we have moved immediately to refund our Federal Account by reimbursement from the Washington Federal Fund. Enclosed is a copy of our refund request and the check and bank deposit receipt from the Washington Federal Fund reimbursement.

Your other objections to the above report shall be addressed within the time specified. Thanking you in advance for your co-operation, I remain,

Sincerely,



Gerald R. Statsa
Counsel
Illinois Democratic Party

GRS/lk

**Democratic
State Central Committee
of Illinois**

Attachment 5

834 South Second Street
Springfield, Illinois 62761
217/522-3471

171 West Randolph, Room 801
Chicago, Illinois 60601
312/572-1161

Carlin A. Suter
Chairman

January 24, 1985

Mr. Robert Hallock
Treasurer, Washington Federal Fund
Rm. 100, City Hall
Chicago, Illinois 60602

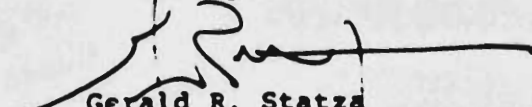
Re: Illinois Democratic Party 30 day post-general report
/C000167015

Dear Mr. Hallock:

The Federal Election Commission has reviewed the above report and has found an excess amount of contributions from the Illinois Democratic Party Federal Account to the Washington Federal Fund for 1984. Therefore, we must hereby request an immediate re-imbursement to the Illinois Democratic Party Federal funds of \$7500.00, which represents said contributions in excess of the limits set forth in the Federal Campaign Laws Act.

A copy of this letter and your check will be forwarded to the F.E.C. so they may conclude this objection. Thanking you in advance for your cooperation, I remain,

Sincerely,


Gerald R. Statza
Counsel
Illinois Democratic Party

GRS/lk

930333205990

424 n85

Checks and other items presented for deposit upon the terms and conditions of the account agreement and subject to depository collection deposited in

From the check, the bank has

7500 00

JAN 24 1985

PLEASE PRINT MAILING ADDRESS IF NOT SHOWN BELOW

DEMOCRATIC STATE CENTRAL COMMITTEE OF ILLINOIS
171 W. MADISON ST., SUITE 201
CHICAGO, IL 60602

CHECKS	7500 00
TOTAL OTHER	
TOTAL ABOVE CHECKS	7500 00
TOTAL FROM REVERSE SIDE	
CURRENCY	
COIN	
TOTAL DEPOSIT	7500 00

SPACE FOR ADDITIONAL LISTINGS ON REVERSE SIDE

⑆071000547⑆

2 056612⑆ 00

MAYOR WASHINGTON FUND
FEDERAL ACCOUNT

1006

JANUARY 24 1985

2-422
716PAY TO THE
ORDER OF

DEMOCRATIC STATE CENTRAL COMMITTEE OF ILLINOIS

\$ 7500.00

SEVEN THOUSAND FIVE HUNDRED DOLLARS AND 00/100

DOLLARS

South Shore Bank
Chicago, Illinois 60649

[Handwritten signature]

[Handwritten signature]

⑆001006⑆ ⑆071004226⑆ ⑆551 783 2⑆



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

February 7, 1985

Kenneth Glover, Treasurer
Mayor Washington Federal Fund
127 North Dearborn Street #638
Chicago, IL 60602

Identification Number: C00178525

Reference: 30 Day Post-General Report (10/18/84-11/26/84)

Dear Mr. Glover:

On January 16, 1985 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

The Commission notes that you have sent to the Illinois Democratic State Central Committee the appropriate contribution refund. However, the following information is still required.

-Please clarify the payment made to the Political Education Project disclosed on Schedule B for Line 21. If a portion or all of the payment were made on behalf of specifically identified Federal candidates, the payment must be allocated among the candidates to include the amount, name, address, and office sought by each candidate. (11 CFR 104.3(b) and 106.1)

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Pamela Brown on our toll-free number (800) 424-9530 or our local number (202) 523-4048.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON D.C. 20463

THIS IS THE BEGINNING OF MUR # 1995

Date Filmed 3/5/86 Camera No. --- 2

Cameraman AS

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