FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

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MUR 4572

November 1, 1996

Chairman Lee Ann Elliott
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Chairman Elliott:

Pursuant to 2 U.S.C. § 437g(a)(1), the Illinois Republican Party files this complaint with the Federal Election Commission upon information and belief that United Democrats of Illinois, Friends of Dick Durbin, "Illinois Victory '96," the Democratic Party of Illinois, the Democratic National Committee and the Democratic Senatorial Campaign Committee violated provisions of the Federal Election Campaign Act of 1971 ("the Act"), as amended. 2 U.S.C. § 431 *et seq.* Specifically, by failing to accurately register committees and file reports of joint fundraising activity in connection with federal elections, the above named committees violated the Act's requirements at §§ 433(a) and 434(a), and failed to follow numerous requirements of the Commission's regulations regarding joint fundraising at 11 CFR § 102.17 *et seq.*

FACTS

An invitation was distributed for a fundraiser held on October 14, 1996, featuring Hillary Rodham Clinton *(see attached)*. The invitation states: "This is a joint fundraising event for Friends of Dick Durbin and United Democrats of Illinois. Please make checks payable to 'Illinois Victory '96'." It also states: "Paid for by Illinois Victory '96, c/o Friends of Dick Durbin, 54 W. Illinois, #500, Chicago, Illinois 60610. Please RSVP to 312/832-9600 or fax to 312/832-0468 [Friends of Dick Durbin]."

Friends of Dick Durbin is the authorized federal committee of Dick Durbin, Democratic candidate for U.S. Senate in 1996. No joint fundraising committee for Friends of Dick Durbin or United Democrats of Illinois has registered with the

Commission. United Democrats of Illinois has not registered with the Federal Election Commission (nor with the Illinois State Board of Elections, despite having made contributions to non-federal candidates -- appearing on candidates' reports -- that would trigger state registration).

Illinois Victory '96 filed a Statement of Organization on September 10, 1996, with the Commission, identifying itself as affiliated with and the joint fundraising committee of the Democratic National Committee and the Democratic Senatorial Campaign Committee, both located at 430 S. Capitol Street, S.E., Washington, D.C. 20003. The Statement does not mention Friends of Dick Durbin or United Democrats of Illinois.

The Statement of Organization of the Democratic Senatorial Campaign Committee lists Illinois Victory '96 as an affiliated committee, and identifies that organization's mailing address at Friends of Dick Durbin, 54 W. Illinois, #500, Chicago, Illinois 60610.

Illinois Victory '96, to which checks for the October 14th fundraiser were to be made payable, has to date not filed any reports of its receipts or expenditures with the Commission -- no quarterly report describing financial activity through September 30, no pre-general report covering October 1st to the 16th, and no "48 hour" notices of contributions of $1000 or more received after October 16th. The Statement of Organization for Illinois Victory '96 identifies its bank depository as NationsBank in Washington, D.C.

Dick Durbin has not amended his Statement of Candidacy to designate Illinois Victory '96 (or any other joint fundraising committee) as an authorized committee in addition to his principal campaign committee. Friends of Dick Durbin has not amended its Statement of Organization to identify Illinois Victory '96 (or any other joint fundraising committee) as an affiliated committee. As of its October 15 quarterly report filed two weeks ago, Friends of Dick Durbin reports no disbursements for advances to Illinois Victory '96 and no transfers in or contributions from Illinois Victory '96.

The pre-general report of the federal account of the Democratic Party of Illinois, filed with the Commission last week, includes a Schedule H2 for identifying allocation ratios for joint federal/non-federal activity. This schedule describes one fundraising event as "108:First Lady" and utilizes a 60% federal and 40% non-federal ratio. The Schedule H4 (joint federal/non-federal activity) itemizes several disbursements for "108:fundraising" on October 14th, including charges for a hotel, entertainment and a sign interpreter, and a disbursement for this event on October 1 for travel and paid to "DNC Travel Offset Acct."

The pre-general report of the Democratic Party of Illinois also shows 39 contributions from individuals during this period, generally ranging between $250 and $5000 (not any for $100, the cost of the Clinton event) and totaling $50,910. Of the 39 donors, 24 were listed as "info. req." for name/occupation (6 others were "housewife" or "retired" and 2 identified

"UDI" as employer and "staff" as occupation). The report shows what were apparently in-kind contributions received during this period from "DNC Services Corporation" and the national Democratic State Victory Fund totaling $49,835.52.

LAW

The Act requires registration of political committees with the Federal Election within ten days of receiving contributions or making expenditures aggregating over $1000 in a FEC calendar year. 2 U.S.C. § 433(a). The Act requires treasurers of political committees to periodically report receipts and disbursements. 2 U.S.C. § 434(a).

The Commission's regulations apply to election-related fundraising conducted jointly by a political committee, including a candidate's committee or party committees, and other political committees or unregistered organizations. *See* 11 CFR § 102.17(a)(1)(i). Participants in a joint fundraising effort must either create a new committee or select a participating committee to act as the fundraising representative for all participants. *Id.* A new, separate committee cannot act as a participant in any other joint fundraising effort. *Id.*

A separate joint fundraising committee must register and report with the Commission. Such a committee "shall collect contributions, pay fundraising costs from gross proceeds and from funds advanced by participants, and disburse net proceeds to each participant." 11 CFR § 102.17(b)(1). Participants must establish a separate bank account for joint fundraising receipts and disbursements. 11 CFR § 102.17(c)(3). All proceeds must be deposited within ten days of receipt. *Id.* Participants must sign a written agreement naming the fundraising representative and stating an allocation formula for allocating proceeds and expense. 11 CFR § 102.17(c)(1). For purposes of reporting contributions, the date of receipt of a contribution by a participating political committee is the date received by the fundraising representative. 11 CFR § 102.17(c)(3).

The joint fundraising representative shall report all funds received and disbursements made within the reporting period. 11 CFR § 102.17(c)(8)(i)(A)&(ii). After distribution of net proceeds, each participating political committee shall report its share of net proceeds as a transfer-in from the fundraising representative and file a memo Schedule A itemizing original contributors. 11 CFR § 102.17(c)(8)(i)(B).

In addition to other notice requirements for solicitations for federal contributions, a joint fundraising notice must be included with every solicitation that includes the following information: the names of all committees participating in the joint fundraising effort and whether such committees are FEC-registered; the allocation formula for distributing proceeds; notice to contributors that they may designate their contributions for a particular participant; and notice the allocation formula may change if a contributor makes a contribution that would exceed the amount the contributor can give to a participant. *See* 11 CFR § 102.17(c)(2). If

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one or more of the participants can lawfully accept contributions that are prohibited under the Act -- such as a non-federal committee -- the fundraising notice must also inform contributors that contributions from prohibited sources will be distributed only to those participants that can accept them. *Id.*

ANALYSIS

The invitation for the October 14th fundraising event clearly identified Illinois Victory '96 as paying for the event and that contribution checks were to be made payable to it. The invitation also clearly stated who was to benefit from the event: Friends of Dick Durbin and United Democrats of Illinois. However, Commission records show Illinois Victory '96, an FEC-registered committee, did not serve as a joint fundraising representative nor abide by the Commission's regulations regarding such activity.

As indicated by a complaint also filed by the Illinois Republican Party with the State Board of Elections (copy enclosed), the Democratic Party of Illinois and its affiliates have demonstrated a general disregard for the purposes of full and accurate financial disclosure under the law. The Illinois Republican Party urges the Federal Election Commission to conduct a thorough investigation of the fundraising event and its participants described in this complaint, and to impose any penalties appropriate for the evident violations involved.

Sincerely yours,

Harold B. Smith
Chairman, Illinois Republican Party

"OFFICIAL SEAL"
John Sheldon Kendall
Notary Public, State of Illinois
My Commission Expires 11/07/98

Sworn and subscribed to this 1st day of November 1996.

John Sheldon Kendall
Notary Public

My commission expires: 11/7/98

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Mayor Richard M. Daley
Hon. Tom Hynes
Hon. John Stroger
Hon. Dick Durbin

Hon. Clem Balanoff	Hon. Rod Blagojevich	Hon. Danny Davis
Hon. Dick Devine	Hon. Luis Gutierrez	Hon. Jesse Jackson Jr.
Hon. Emil Jones	Hon. Gary J. LaPaille	Hon. Bill Lipinski
Hon. Michael Madigan	Hon. Carol Moseley-Braun	Hon. Bobby Rush
Hon. Miriam Santos	Hon. Paul Simon	Hon. Sidney Yates

invite you to a special reception honoring

Hillary Rodham Clinton

Monday, October 14, 1996
6:00 p.m. - 7:30 p.m.

International Ballroom
Chicago Hilton & Towers
720 S. Michigan Avenue - Chicago

Tickets $100 (admits two)
Steering Committee $2,500

For more information, please call Fred Krol or Kathy Tisdahl at (312)832-9600.

This is a joint fundraising event for Friends of Dick Durbin and United Democrats of Illinois. Please make checks payable to "Illinois Victory '96."

Paid for by Illinois Victory '96, c/o Friends of Dick Durbin, 54 W. Illinois #500, Chicago, Illinois 60610. Please RSVP to 312/832-9600 or fax to 312/832-0468. Contributions to this committee are not deductible for federal income tax purposes.

Federal law requires political committees to request the name, mailing address, occupation and name of employer for each individual whose contributions aggregate in excess of $200 in a calendar year.

ALLSTATE TO SELL HQ OF FORMER UNITS

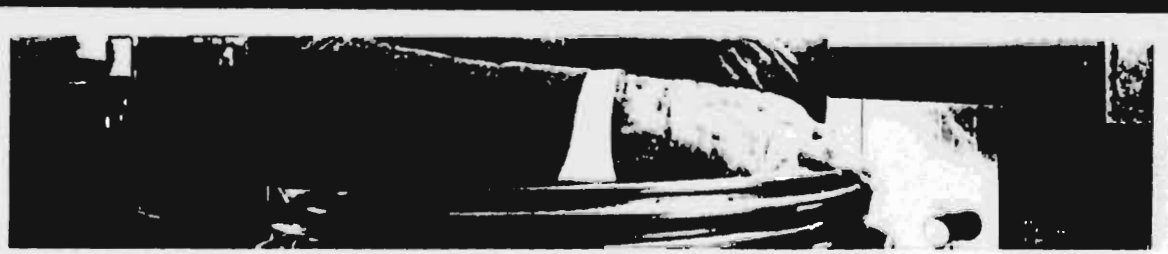
▶ Allstate Insurance Co. is selling its 500,000-square-foot office building in South Barrington. The facility, on 65 acres on West Higgins Road, housed the property and casualty divisions as well as the reinsurance operations of Allstate [illegible] were sold during the summer in separate deals. North Brook-based Allstate, which is being represented by CB Commercial Real Estate Inc., is seeking

Continued on Page 2

INSIDE

New feature debuts: Random Walk

A weekly look at trends, oddities, outrages and other quirks that make Chicago a fascinating place to work and play. **Page 2**



That's not Jake: *I've got nothing to say to him," Jake's Pizza International Inc. founder John "Jake" Flowers says of Sammy V. P. Banks, his estranged partner in the chain's troubled public offering.*

How IPO burned friends, investors

Even Vanna White can't flip misfortune: a pizza chain that became stock loser

By JENNIFER WATERS

John "Jake" Flowers and Samuel V. P. Banks were friends and business partners for 20 years.

Their families went on outings and spent summer nights barbecuing at each other's homes. Messrs. Flowers and Banks often could be seen on the greens together, or at the 19th hole, recounting tournament plays.

Their business link was Jake's Pizza International Inc., a modest chain of 32 pizzerias founded by Mr. Flowers in 1961 and taken public by the two men in 1993.

But today, the partners no longer speak, and their dream to build a national pizza chain is about burnt to a crisp.

The $3.2 million raised in the initial public offering (IPO) has been squandered through dealings

See **IPO** *on Page 61*

The company's local affiliate, United HealthCare of Illinois Inc., which has suffered an exodus of staff from its South Wacker Drive headquarters, also has lost a number of big corporate accounts, including Zenith Electronics Corp., Montgomery Ward & Co. and the Chicago Transit Authority (CTA). United HealthCare officials have said they'll lose up to 70,000 subscribers this year, according to sources at the company.

In addition, United HealthCare has angered hospitals and doctors with slow payments. The clearest evidence of the friction: A recent survey by the main local hospital trade group, Metropolitan Chicago Healthcare Council (MCHC), gave health maintenance organizations (HMOs) owned by United HealthCare the lowest marks among all Chicago HMOs for paying claims promptly and maintaining good relationships with local health care institutions.

Marshall V. Rozzi, hired last year as CEO of United HealthCare of Illinois, labels the problems "old news"—related to

See **HMO** *on Page 63*

Behind the scenes, it's a Hynes vs. Ryan election

By GREG HINZ Crains 10/28/96

Head to the front lines of the election battleground any evening this week and you're certain to run into a precinct worker whose day job is with Secretary of State George Ryan.

In fact, Mr. Ryan's chief of staff has spent so much time at the House Republican campaign office in Elmhurst lately that the office secretary there knows his schedule.

Slip over to the opposite side of the trenches and you'll soon find a canvasser who works for or has been dispatched by Cook County Assessor Thomas Hynes.

"While the Daleys were running the Democratic National Convention this summer," confides one top Democratic insider,

See **ELECTION** *on Page 56*

Pols' pols: *Democratic Cook County Assessor Tom Hynes, left, and Republican Secretary of State George Ryan are their parties' behind-the-scenes powers this campaign season.*

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Hynes vs. Ryan: the unspoken slugfest

ELECTION *from Page 1*

"Hynes was putting the statewide fall campaign together."

That's the way it is in Illinois hot sports as the 1996 election campaign peaks. High profile names like Clinton and Dole and Durbin and Salvi dominate the ballot. Other party leaders have more impressive titles. But two political war horses, Republican Mr. Ryan, 62, and Democrat Mr. Hynes, 57, are the key behind the scenes powers raising money, fielding troops and boosting morale.

Neither official is running for anything—this year. But both have enough time left on their personal clocks for one more grab for political glory. Depending on their desires and how the field shapes up, they could end up running against each other for governor in 1998.

They're certainly accumulating IOUs.

Hefty war chests

"George has been very helpful," says Jack Dorgan, deputy chief of staff for Illinois House Speaker Lee Daniels, who is getting troops, money or both from Mr. Ryan in dozens of House districts.

The story's similar in the Democratic camp.

"If you were to say there's one person who's kind of taken charge here, it's Tom Hynes," says Democratic media adviser David Axelrod, referring in part to a $450,000-plus last minute media blitz Mr. Hynes put together to push a straight-Democratic vote.

Mr. Ryan's strength is his political army. With 3,700 employees on his state payroll (including dozens who also are township and county GOP chairs) and well over $1 million in his political war chest, he's lent hundreds of workers to others this campaign season and donated $200,000 to legislative candidates.

Neither official is running for anything—this year. But both have enough time left on their personal clocks for one more grab for political glory.

"George Ryan is a great leader," purrs Republican state Sen. Walter Dudycz, who is locked in a tight re-election fight in his Northwest Side 7th District. Asked about Gov. Jim Edgar, who aides say has made numerous campaign appearances for GOP legislators, Mr. Dudycz pauses and replies, "He's a great governor."

Mr. Ryan has been particularly helpful to U.S. Senate hopeful Al Salvi. He embraced Mr. Salvi right after the bruising spring primary, and dispatched his Chicago press chief, John Torre, to handle the Wauconda Republican's media campaign. When the candidate got depressed about poll results last week, "George called and gave him a pep talk," says a Salvi insider. "It worked."

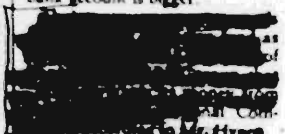
Mr. Ryan has been known to make friends on the other side of the aisle by slipping Democratic bosses a job or two.

"I don't ask" job applicants their party affiliation, he says. But such brash wheeling and dealing has earned Mr. Ryan a less-than-pure image—and a few enemies.

For instance, State's Attorney Jack O'Malley, like Mr. Ryan, is a potential candidate for governor in 1998. Mr. O'Malley reportedly was less than thrilled this spring when another Ryan press aide, Bill Scott, went to work for Richard Devine, the Democratic candidate for state's attorney.

Mr. Scott, who's since left the Devine campaign, says taking the job was strictly his idea.

Mr. Hynes' army is smaller than Mr. Ryan's, but his political bank account is bigger.



Democrats first ran a similar "unified campaign" in 1992, but the structure has flowered this year because of Mr. Hynes, who is trusted by both Mayor Richard M. Daley and House Democratic Leader Michael Madigan. He also was hand-picked for the job by a now-powerful 15-year acquaintance, Bill Clinton.

Says State Rep. Jeffrey Schoenberg, D-Wilmette, an independent who has often clashed with party leaders, "Tom Hynes has very adroitly balanced the egos, coordinated the message and made sure the dollars are spent right."

Kevin O'Keefe, deputy assistant to President Clinton and the man who carries the Illinois portfolio in the White House, credits Mr. Hynes with long ago learning that Illinois extends beyond Chicago—a lesson lost on many Cook County Democrats.

"This year's unity is a testament to his political acumen," says Mr. O'Keefe.

Others credit Mr. Hynes, former president of the Illinois Senate, with looking out for the interests of the current Democratic Senate leader, Emil Jones, who holds a much weaker political hand than his House counterpart, Mr. Madigan.

Besides statewide mastery of their respective parties' political apparatuses, Messrs. Hynes and Ryan share something else: stalled careers—at least until 1998.

Mr. Hynes left Springfield two decades ago because he wanted to be closer to his school-age children. In five terms as assessor, the Beverly lawyer is credited by some observers with cleaning up an office that by appearances had become little more than the Democratic Party treasury.

But he badly miscalculated in 1987, when he ran a third-party race for mayor against the late Harold Washington. That means Mr. Hynes would have to rebuild relations with African-American voters if he were to run in 1998. Still, Democrats need a big-name candidate if they are to reverse the current situation, in which they are shut out of statewide elective posts.

Future ambitions

Mr. Hynes says it's "not in my plans" to be that candidate, and insists he's so active this year because "we need Bill Clinton for four more years."

A national post, perhaps as an ambassador, also draws a shrug from Mr. Hynes, but Washington sources say a job is there if he wants one.

Mr. Ryan, a former pharmacist from Kankakee, clearly is eager to move up. In an interview, he notes that, by 1998, he will have been secretary of state about as long as he was lieutenant governor and a state representative.

Mr. Ryan's problem is timing. If Gov. Edgar seeks another term, Mr. Ryan's choices are to run against him in a primary (doubtful, say friends), retire or run for the U.S. Senate and, if successful, be a 64-year-old freshman.

If he did run, he might get some unusual support. "George Ryan is not the typical Republican," says Alderman William Banks (36th), also a Democratic committeeman. "He's a street fighter. He's an affable guy. He's like a Democrat."

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Can Edgar beat Dole drums?

GOP hopes to avoid a pounding

By PAUL MERRION

After a week in the sun and fun of San Diego, Illinois Republicans hope to be tanned, rested and ready to get Bob Dole elected this fall.

The tan should be no problem.

As this week's GOP National Convention launches the Dole presidential campaign anew, Gov. Jim Edgar will be setting sail for the fall elections with nothing less than the White House and his party's control of the Illinois General Assembly at stake.

This year's presidential election ultimately will be determined by the air war—the political advertising and media dissemination of the candidates' messages—and possibly external events, such as potential foreign policy flare-ups.

But the trench warfare of political organizing—the elements that are under Gov. Edgar's direct control—will be a crucial factor if the race in Illinois tightens, as many expect it will.

Against a treacherous political tide, Gov. Edgar will be using the same map that guided Republicans to victory in 1994.

"I think our course is pretty well set," says Illinois Republican State Central Committee Chairman Harold Byron Smith Jr., referring to the party's telephone canvassing, direct mail, get-out-the-vote and other organizational efforts. "All of these things have been done before. It's a question this year of doing more of it."

There's also a question of whether that's enough, given President Clinton's lead in the polls and the Democratic Party's aggressive organizing efforts in Illinois and elsewhere.

"I expect this to be a real battleground," says Cook County Assessor Thomas Hynes, who heads United Democrats of Illinois, the state party's effort to coordinate with the Clinton-Gore campaign. "We will have upwards of 20,000 people involved," or more than one doorbell-pusher for each of the state's roughly 11,000 precincts.

Democrats also have 75 volunteers registering voters, working toward a goal of 500,000 new voters. While Republicans are matching Democrats on efforts such as phone banks and direct mail, there is no statewide voter registration effort.

"Some county organizations may do it," says John McGovern, press secretary for the state Republican Party. "It's a question of, is

See GOP on Page 71

Meantime, protests get really personal

Peddling products, not politics, to Dems

By JOANNE CLEAVER

There are platforms, and then there are platforms.

For John LaMantia, Loop attorney by day, leader of rock band Ram Kings by night, the Democratic National Convention quite literally provides something to stand on.

When Mr. LaMantia heard that city officials were providing a sound stage at Michigan Avenue and Balbo Drive for protest groups wanting to raise a controlled ruckus during the convention, he joined representatives of 32 groups in a lottery for time slots.

Mr. LaMantia has no political aspirations, but he knows a media event when he sees one.

"I saw it as an opportunity to play in front of a national audience," he says. "We just have to plug in and rock and roll."

His message? Support of the National Endowment for the Arts will be ubiquitously allied to during the band's stage.

Michigan and Balbo—site of violent confrontations between demonstrators and police in 1968—is one of two officially sanctioned protest areas that will feature a procession of "demonstrations." Mingling with activist groups such as Amnesty International and the National Alliance Against Racism and Political Repression will be people looking for fame, fortune or—at the very least—an audience.

Consider the DNC Poetry Patriots—a group formed expressly for the convention.

"We're not protesting anything. We're

existing challenges, including again. He's trying to say, 'Look it, we But other managers are worried

meritech

nued from Page 3

ngtime monopoly to activate to their customers, maintain ser- nd fix problems.

nsolidated, as the first company mpete with Ameritech for resi- l customers in Illinois, is giv- e $13-billion company its first munity to show how it treats ettors.

e early returns aren't encourag-

ublic y state they want ettitors, houses Consolidated dent Robert Currey. "But their ior doesn't bear that out."

y tactics

a filing in the ICC investigation, olidated complains about long s in connecting its customers, ssive charges and unnecessary ipe. It also says Ameritech is us- e delays as a marketing weapon, ising faster hookups to cus- rs who choose Ameritech over olidated.

meritech says it's doing all it can eet Consolidated's needs, given difficulty of running competitors' over its network.

t's critical to remember that re de ith prices and opera- al proc es that are being im- mented for the first time," an eritech spokesman says, noting the two companies are trying to lve the issues through negotia- .

or example, Ameritech is trying educe the lead time for hooking Consolidated customers to three s from five.

lore important than any specif- ipe is the unpleasant sugges- highlighted by the dispute. eritech has not yet paved the for competition in its markets. il it can convince regulators it removed obstacles to competi- , it will remain disconnected m the long-distance business.

s opposed to potential competi- like long-distance carrier MCI Consolidated has long held the local service monopoly in an area encompassing the Central Illinois communities Charleston, Mattoon, Effingham and Taylorville. Total customers: 85,000—about as many as Ameritech has in Springfield alone.

"We serve a lot of corn," jokes Scott Jennings, a Consolidated vice president who oversees the competitive market push.

Consolidated launched its service in May with a flurry of television, radio, billboard and print advertising that generated a flood of orders in Champaign-Urbana, Decatur and Springfield. So far, the closely held utility has signed up about 2,500 customers. Key selling points have been lower rates and the ability to consolidate all telephone service with a single provider.

"We went from $150 to $50 per month," says Erika Frank of Springfield, who switched both her local and long-distance service to Consolidated in late June.

But Consolidated recently suspended its marketing campaign, saying Ameritech's five-day lead times in activating customers undermines its efforts.

"We probably would have had about 30% more customers right now," charges Mr. Jennings.

Neil Cox, president of the Ameritech unit responsible for connecting companies like Consolidated, says longer lead times can't be helped because Ameritech technicians must physically shift wires from an Ameritech switch to a Consolidated switch. New Ameritech customers can be activated entirely by computer, he says.

"This type of work is much more complex," he says.

'Fear of competition'

Consolidated's Mr. Currey, an alumnus of the old Bell system—he once worked for Michigan Bell—compares Ameritech's approach to AT&T Corp.'s stonewalling of long-distance competitors in the early 1980s.

"We put in all these bureaucratic

GOP

Continued from Page 4

out time and money better spent elsewhere?"

But Republicans vow to have 25,000 volunteers working precincts by Election Day.

"I'm optimistic," says state Sen. Kirk Dillard, R-Hinsdale, because polls don't take into account that 32 states have Republican governors, providing political organizations that will help Mr. Dole.

"All of these governors are a real sleeper," he adds, especially in Illinois, where "a lack of any Democratic statewide officeholders hurts the Democratic Party because they don't have precinct-level workers."

Fund-raising focus

GOP fund raising has improved greatly under Mr. Smith's three-year tenure as head of the state party, allowing an expansion of staff, the addition of a third state party office (in Bensenville) and more organizational efforts.

Although the state party's coffers stood at $542,636 as of June 30, the plan is to raise $1.5 million to $2 million more for the fall campaign.

"We're ahead of the curve on fund raising, but we've got a bigger plan" this year, says Mr. Smith.

At this point, winning Illinois is a top priority for Mr. Dole, as evidenced by his six trips to the state this year, especially at key times such as the Fourth of July and last week for the announcement of his economic plan.

But the most crucial reason Republicans pray for a good showing by the party's standard-bearer is that the state House and Senate easily could revert to Democratic control if President Clinton runs strong.

The worst-case scenario for Republicans is the possibility that the Dole campaign will give up in Illinois well before the election to concentrate its resources elsewhere, as the Bush campaign did in 1992, dooming other GOP candidates to defeat.

If Mr. Dole suffers a crushing defeat, many observers expect he won't be the only one.

"The bottom line is, if Clinton wins by 15 points or more in Illinois, Republican majorities in both houses are in jeopardy," observes Rob Christie, Chicago-based FMC Corp.'s director of public affairs.

The situation is especially dire for House Speaker Lee Daniels, R-Elmhurst. A shift of only six GOP seats would make him minority leader again.

'A precarious position'

"It's a pretty precarious position for Lee," says Scott Fawell, Secretary of State George Ryan's chief of staff and top political operative. "If Clinton runs 53% to 54%, Lee's got problems."

In fact, the Ryan organization is focusing on maintaining a GOP majority in the House, rather than on the broader presidential effort.

Although he now backs former Sen. Dole, Mr. Ryan previously favored Sen. Phil Gramm, R-Texas, and chaired his Illinois primary campaign effort.

"There are about eight races we're quote-unquote responsible for," primarily in the southwest suburbs and Downstate, Mr. Fawell says. "I'm throwing probably 500 people out there at some point. In some cases, we're supplying the entire manpower" for those campaigns.

Protest

Continued from Page 4

have five minutes to read his or her work.

Then there's St. Louis resident Matthew Morrison, who *does* have a cause. A former member of the Irish Republican Army, Mr. Morrison is facing deportation after a three-year fight with the U.S. Immigration and Naturalization Service. Married to a U.S. citizen for 12 years, he very much wants to stay, and hopes to get media attention that might raise his profile with the politicians he intends to collar to plead his case. Mr. Morrison says he expects as many as 500 supporters from Detroit, Cleveland, Kansas City and St. Louis to show up and hold placards alongside

Washington, D.C., will be advocating greater political support for exploration and commercial development of space through a "teach-in," says a spokeswoman. Also adopting an educational approach is the Toledo, Ohio-based Assn. for Children for Enforcement of Support Inc., which wants more stringent enforcement of child support edicts.

These groups say it's easier to stage an educational event in a contained area, rather than attempt a free-form demonstration where their points may get lost in the shuffle.

Crowded coalition

The Not on the Guest List Coalition brings together 60 activist groups that oppose racism in the criminal justice system, advocate

togenarian protester David Dellinger (one of the Chicago Seven and a demonstrator in 1968), who she hopes will draw a crowd.

The accidental activist

Not everyone who won a spot in the lottery has a cause, or even a craving for the spotlight. One woman has nothing to say at all.

Kathleen Moss, a lifelong Chicagoan, left her name with Mayor Richard Daley's office because she thought she'd like to volunteer as a greeter or something similar at the convention.

Somehow, her name got mixed in with the lottery applicants. Now, Ms. Moss is the inadvertent sponsor of two one-hour intermissions—at Balbo and Michigan and Parking Lot E at the United Center.

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

1 (a) NAME OF COMMITTEE IN FULL [ ] (Check if name is changed)
Democratic Senatorial Campaign Committee

(b) Number and Street Address [ ] (Check if address is changed)
430 S. Capitol Street, SE

(c) City, State and ZIP Code
Washington, DC 20003

2 [illegible] SECRETARY OF THE SENATE
PUBLIC RECORDS
98 SEP 18 AM 7:26

3 FEC IDENTIFICATION NUMBER
C00062266

4 IS THIS STATEMENT AMENDMENT?
[X] YES [ ] NO

5 TYPE OF COMMITTEE (Check one)

[ ] (a) This committee is a principal campaign committee (Complete the candidate information below.)

[ ] (b) This committee is an authorized committee, and is NOT a principal campaign committee (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District

[ ] (c) This committee supports/opposes only one candidate, _____ (name of candidate), and is NOT an authorized committee.

[X] (d) This committee is a National (National, State or subordinate) committee of the Democratic (Democratic, Republican, etc.) Party.

[ ] (e) This committee is a separate segregated fund.

[ ] (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
Illinois Victory '96	Friends of Dick Durbin P.O. Box 1949, Springfield, VA	Joint Fundraising
Democratic National Committee	430 S. Capitol St., Wash. DC	Joint Fundraising

Type of Connected Organization
[ ] Corporation [ ] Corporation w/o Capital Stock [ ] Labor Organization [ ] Membership Organization [ ] Trade Association [ ] Cooperative

7 Custodian of Records: Identify by name, address (phone number optional) and position of the person in possession of committee books and records.

Full Name	Mailing Address	Title or Position
Paul Johnson	430 S. Capitol Street, SE, Wash., DC 20003	Treasurer

8 Treasurer: List the name and address (phone number optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position
Paul Johnson	430 S. Capitol Street, SE, Wash., DC 20003	Treasurer
Darlene Setter	430 S. Capitol Street, SE, Wash., DC 20003	Asst. Treasurer

9 Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
NationsBank	730 Fifteenth Street, NW, Wash., DC 20005

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

TYPE OR PRINT NAME OF TREASURER	SIGNATURE OF TREASURER	DATE
Paul Johnson	Paul Johnson	9-11-98

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.
ANY CHANGE IN INFORMATION SHALL BE REPORTED WITHIN 10 DAYS.

For further information contact:
Federal Election Commission
Toll free (800) 424-9530
Local (202) 376-3120

FEC FORM 1
(revised 4.0)

96020193822

[illegible]

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

1. (a) NAME OF COMMITTEE IN FULL: Illinois Victory '96 ☐ (Check if name is changed)

2. DATE RECEIVED: SECRETARY OF THE SENATE PUBLIC RECORDS

(b) Number and Street Address: 430 S. Capitol St., SE ☐ (Check if address is changed)

3. FEC IDENTIFICATION NUMBER: 96 SEP 13 AM 7:06

(c) City, State and ZIP Code: Washington, DC 20003

4. IS THIS STATEMENT AN AMENDMENT? ☐ YES ☒ NO

5. TYPE OF COMMITTEE (Check one)

☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)

☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District

☐ (c) This committee supports/opposes only one candidate _____ (name of candidate) and is NOT an authorized committee

☐ (d) This committee is a _____ (National, State or subordinate) committee of the _____ (Democratic, Republican, etc.) Party

☐ (e) This committee is a separate segregated fund.

☒ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
Democratic Senatorial Campaign Committee	430 S. Capitol St., SE Washington, DC 20003	Joint Fundraising
Democratic National Committee	430 S. Capitol St., SE Washington, DC 20003	Joint Fundraising

Type of Connected Organization

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name	Mailing Address	Title or Position
Paul Johnson	430 S. Capitol St.,SE Washington, DC 20003	Treasurer

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee, and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position
Paul Johnson	430 S. Capitol St., SE, Washington, DC	Treasurer
Darlene Setter	430 S. Capitol St., SE, Washington, DC 20003	Asst. Treasurer

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
NationsBank	730 Fifteenth St., NW, Washington, DC 20005

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

TYPE OR PRINT NAME OF TREASURER	SIGNATURE OF TREASURER	DATE
Paul Johnson		9-13-96

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. (437g)

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

For further information contact:
Federal Election Commission
Toll-free (800) 424-9530
Local 202-376-3120

FEC FORM 1 (revised 4-87)

96020193826

SCHEDULE H2
(Effective 1/1/91)

ALLOCATION RATIOS

PAGE 1 OF 1

NAME OF COMMITTEE
DEMOCRATIC PARTY OF ILLINOIS C00167015

ALLOCATION RATIOS FOR INDIVIDUAL FUNDRAISING EVENTS, EXEMPT ACTIVITIES, AND SHARED DIRECT CANDIDATE SUPPORT APPEARING ON THIS REPORT

Methods of allocation

I **FUNDRAISING** activities are allocated using the "funds received method" where the federal proportion of expenses must equal the federal proportion of monies raised.

II **EXEMPT** activities are allocated using the "time and space method" where the federal proportion of disbursements is based on the proportion of time or space devoted to federal candidates.

III Shared **DIRECT CANDIDATE** support activities are allocated according to benefit expected to be derived, where the federal proportion of disbursements is based on the benefit derived by federal candidates from the activity.

NAME OF ACTIVITY OR EVENT	FEDERAL %	NON-FEDERAL %
107. BLUES ACTIVITY IS X FUNDRAISING ___ EXEMPT ___ DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS ___ NEW ___ REVISED X SAME AS PREVIOUSLY REPORTED	30	70
NAME OF ACTIVITY OR EVENT 108. FIRST LADY ACTIVITY IS X FUNDRAISING ___ EXEMPT ___ DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS X NEW ___ REVISED ___ SAME AS PREVIOUSLY REPORTED	60	40
NAME OF ACTIVITY OR EVENT 109. ASIAN PACIFIC ACTIVITY IS X FUNDRAISING ___ EXEMPT ___ DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS X NEW ___ REVISED ___ SAME AS PREVIOUSLY REPORTED	90	10
NAME OF ACTIVITY OR EVENT ACTIVITY IS ___ FUNDRAISING ___ EXEMPT ___ DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS ___ NEW ___ REVISED ___ SAME AS PREVIOUSLY REPORTED	FEDERAL %	NON-FEDERAL %
NAME OF ACTIVITY OR EVENT ACTIVITY IS ___ FUNDRAISING ___ EXEMPT ___ DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS ___ NEW ___ REVISED ___ SAME AS PREVIOUSLY REPORTED	FEDERAL %	NON-FEDERAL %
NAME OF ACTIVITY OR EVENT ACTIVITY IS ___ FUNDRAISING ___ EXEMPT ___ DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS ___ NEW ___ REVISED ___ SAME AS PREVIOUSLY REPORTED	FEDERAL %	NON-FEDERAL %
NAME OF ACTIVITY OR EVENT ACTIVITY IS ___ FUNDRAISING ___ EXEMPT ___ DIRECT CANDIDATE SUPPORT CHECK IF THE RATIO IS ___ NEW ___ REVISED ___ SAME AS PREVIOUSLY REPORTED	FEDERAL %	NON-FEDERAL %

DISBURSEMENT SCHEDULE H[redacted]

effective [redacted]

JOINT FEDERAL/NON-FEDER[redacted] ACTIVITY SCHEDULE

PAGE 1 OF 37

FOR LINE 21a

NAME OF COMMITTEE

DEMOCRATIC PARTY OF ILLINOIS C00167015

A. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
INDIA HOUSE RESTAURANT 2548 W. DEVON AVENUE CHICAGO IL 60659	107: BLUES	10/01/96		30.00%	70.00%
CATEGORY ☐ADMINISTRATIVE/VOTER DRIVE ☒FUNDRAISING ☐EXEMPT EVENT YEAR-TO-DATE 2,546.00 ☐DIRECT CANDIDATE SUPPORT			2,375.00	712.50	1,662.50
B. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
LYNN JORDAN 500 N. DEARBORN CHICAGO, IL	108: ENTERTAINMENT	10/14/96		60.00%	40.00%
CATEGORY ☐ADMINISTRATIVE/VOTER DRIVE ☒FUNDRAISING ☐EXEMPT EVENT YEAR-TO-DATE 600.00 ☐DIRECT CANDIDATE SUPPORT			600.00	360.00	240.00
C. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
HILTON 720 S. MICHIGAN CHICAGO, IL 60605	108: FUNDRAISING	10/14/96		60.00%	40.00%
CATEGORY ☐ADMINISTRATIVE/VOTER DRIVE ☒FUNDRAISING ☐EXEMPT EVENT YEAR-TO-DATE 10,600.00 ☐DIRECT CANDIDATE SUPPORT			10,000.00	6,000.00	4,000.00
D. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
BONNIE KOSS 1405 BOB-O-LINK HIGHLAND PARK, IL 60035	108: INTERPRETER	10/14/96		60.00%	40.00%
CATEGORY ☐ADMINISTRATIVE/VOTER DRIVE ☒FUNDRAISING ☐EXEMPT EVENT YEAR-TO-DATE 10,675.00 ☐DIRECT CANDIDATE SUPPORT			75.00	45.00	30.00
E. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
DNC TRAVEL OFFSET ACCT. WASHINGTON, DC 20007	108: TRAVEL	10/01/96		60.00%	40.00%
CATEGORY ☐ADMINISTRATIVE/VOTER DRIVE ☒FUNDRAISING ☐EXEMPT EVENT YEAR-TO-DATE 11,000.09 ☐DIRECT CANDIDATE SUPPORT			325.09	195.05	130.04
F. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
MOONLIGHT CAFE 316 W. ERIE CHICAGO, IL 60610	109: CATERING	10/07/96		90.00%	10.00%
CATEGORY ☐ADMINISTRATIVE/VOTER DRIVE ☒FUNDRAISING ☐EXEMPT EVENT YEAR-TO-DATE 3,300.00 ☐DIRECT CANDIDATE SUPPORT			3,300.00	2,970.00	330.00
SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE			16,675.09	10,282.55	6,392.54
TOTAL THIS PERIOD (Fed share to 21 a i and non-Fed share to 21 a ii)					
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for line 31 of the detailed summary page)					

FES-H4-002

FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 13, 1996

Harold B. Smith, Chairman
Illinois Republican Party
320 South Fourth Street
Springfield, IL 62701-02

RE: MUR 4572

Dear Mr. Smith:

This letter acknowledges receipt on November 5, 1996, of the complaint you filed alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The respondent(s) will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 4572. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

F. Andrew Turley, Attorney
Central Enforcement Docket

Enclosure
Procedures

9804336227

FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 13, 1996

Michael E. Daly, Treasurer
Friends of Dick Durbin Committee
PO Box 1949
Springfield, IL 62705

RE: MUR 4572

Dear Mr. Daly:

The Federal Election Commission received a complaint which indicates that the Friends of Dick Durbin Committee ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4572. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain 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 matter to be made public. 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 authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

F. Andrew Turley, Attorney
Central Enforcement Docket

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

2304336250

FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 13, 1996

John Gianules, Treasurer
Illinois Democratic Party
489 Merchandise Mart
Chicago, IL 60654

RE: MUR 4572

Dear Mr. Gianules:

The Federal Election Commission received a complaint which indicates that the Illinois Democratic Party ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4572. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain 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 matter to be made public. 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 authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

F. Andrew Turley, Attorney
Central Enforcement Docket

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

9804336251-1

FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 13, 1996

R. Scott Pastrick, Treasurer
DNC Services Corporation/
Democratic National Committee
430 S. Capitol Street, SE
Washington, DC 20003

RE: MUR 4572

Dear Mr. Pastrick:

The Federal Election Commission received a complaint which indicates that the DNC Services Corporation/Democratic National Committee ("DNC") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4572. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the DNC and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain 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 matter to be made public. 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 authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

F. Andrew Turley, Attorney
Central Enforcement Docket

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

9804336211

FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 13, 1996

Paul Johnson, Treasurer
Democratic Senatorial Campaign Committee
430 S. Capitol Street, SE
Washington, DC 20003

RE: MUR 4572

Dear Mr. Johnson:

The Federal Election Commission received a complaint which indicates that the Democratic Senatorial Campaign Committee ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4572. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain 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 matter to be made public. 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 authorizing such counsel to receive any notifications and other communications from the Commission.

2804326231

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

F. Andrew Turley, Attorney
Central Enforcement Docket

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

2804332315

FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 13, 1996

The Honorable Richard Durbin
1525 S. Bates
Springfield, IL 62704

RE: MUR 4572

Dear Senator Durbin:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4572. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain 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 matter to be made public. 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 authorizing such counsel to receive any notifications and other communications from the Commission.

9804336237

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

F. Andrew Turley, Attorney
Central Enforcement Docket

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

2804336217

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. WASHINGTON, D.C. 20005-2011
TELEPHONE: 202 628-6600 FACSIMILE: 202 434-1690

JUDITH L. CORLEY
(202) 434-1622

November 26, 1996

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Nov 27 1 30 PM '96

Alva E. Smith
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 4572 - Democratic Senatorial Campaign Committee

Dear Ms. Smith:

We received the enclosed designation of counsel today in the above-referenced Matter Under Review. This letter is to request an extension of 20 days to prepare the response to the complaint.

Because of the holidays and staff vacations scheduled after the election, the additional time is necessary to coordinate the gathering of information and preparation of the response for this matter.

The complaint was received while the Treasurer was on vacation, so we do not know the exact date it was received by the Committee. Since your letter was dated November 13, if we assume a three-business-day mailing period, it would have been received by the Committee on November 18. With the extension, a response would be due on December 23.

If you have any questions or need additional information, please contact the undersigned.

Very truly yours,

Judith L. Corley
Counsel for Respondent

[04005-0001/DA963310.031]

2804336213

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4572

NAME OF COUNSEL: Robert F. Bauer/Judith L. Corley

FIRM: Perkins Coie

ADDRESS: Suite 800
607 Fourteenth Street, N.W.
Washington, D.C. 20005-2011

TELEPHONE: (202) 628-6600

FAX: (202) 434-1690

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.

11/26/96
Date

Signature

Paul Johnson, Treasurer

RESPONDENT'S NAME: Democratic Senatorial Campaign Committee

ADDRESS: 430 S. Capitol St. SE
Washington, DC 20003

TELEPHONE: HOME( ) NA

BUSINESS(202) 224-2447

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
Nov 27 1 30 PM '96

9804333219

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

December 2, 1996

Judith L. Corley, Esquire
Robert F. Bauer, Esquire
PERKINS COIE
607 Fourteenth Street, N.W.
Washington, D.C. 20005-2011

RE: MUR 4572
Democratic Senatorial Campaign Committee and Paul Johnson, as treasurer

Dear Ms. Corley and Mr. Bauer:

This is in response to your letter dated November 26, 1996, which we received on November 27, 1996, requesting an extension until December 23, 1996, to respond to the complaint filed in the above-noted matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on December 23, 1996.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Alva E. Smith, Paralegal
Central Enforcement Docket

9304336235C

WIN IN '96
DEMOCRATIC NATIONAL COMMITTEE
Donald L. Fowler, *National Chair* • Christopher J. Dodd, *General Chair*

November 26, 1996

Colleen T. Sealander
Office of the General Counsel
Central Enforcement Docket
Federal Election Commission
999 E Street, NW, Room 639
Washington, DC 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
96 NOV 27 PM 4:53

RE: Response to MUR 4572

Dear Ms. Sealander:

This letter constitutes the response of the DNC Services Corporation/Democratic National Committee ("DNC"), and R. Scott Pastrick, as Treasurer, to the Commission's initiation of MUR 4572. While the undersigned represent the DNC in this matter, we have been unable to obtain a Designation of Counsel from R. Scott Pastrick, Treasurer of the DNC. Such designation shall be filed with your office as soon as possible.

The DNC hereby requests that the Federal Election Commission ("FEC" or "the Commission") find no reason to believe the DNC committed any violation with respect to the issues raised and dismiss the matter with respect to the DNC.

BACKGROUND

This matter relates to a complaint filed by the Illinois Republican Party against the DNC, the United Democrats of Illinois, the Friends of Dick Durbin Committee, "Illinois Victory '96," the Democratic Party of Illinois, and the Democratic Senatorial Campaign Committee ("DSCC") alleging that these entities violated the registration and reporting requirements of the Federal Election Campaign Act and violated the Commission's regulations on joint fundraising.

As the facts below demonstrate, the DNC committed no violations with respect to the "Illinois Victory '96" fundraising project and therefore the DNC should be dismissed as a respondent in this MUR.

9304386231

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Nov 27 4 53 PM '96

ARGUMENT

On September 18, 1996, the DNC and the DSCC filed a statement of organization for "Illinois Victory '96," which was intended to be a joint fundraising committee to raise federal and non-federal funds for the two entities at an event in late September of this year, in Chicago, Illinois. The event for which the DNC and DSCC contemplated raising funds for "Illinois Victory '96" was cancelled, and therefore, other than for bank charges, no funds were ever raised or spent in connection with this project (See attached bank statements for Illinois Victory '96-Federal and Non-Federal Accounts).

Entirely separate from the DNC and the DSCC's proposed joint fundraiser, the Friends of Dick Durbin committee and the United Democrats of Illinois apparently arranged a fundraising project under the name "Illinois Victory '96." As the invitation attached to the complaint clearly states, this project was a one-night fundraising event held at the Chicago Hilton on October 14, 1996, honoring the First Lady, Hillary Rodham Clinton.

The notation on the invitation reads (in relevant part):

> This is a joint fundraising event for Friends of Dick Durbin and United Democrats of Illinois. Please make checks payable to 'Illinois Victory '96.
>
> Paid for by Illinois Victory '96, c/o Friends of Dick Durbin, 54 W. Illinois, #500, Chicago, Illinois 60610. Please RSVP to 312/832-9600 or fax to 312/832-0468. Contributions to this committee are not deductible for federal income tax purposes.

The joint fundraising committee registered with the Commission by the DNC and the DSCC had nothing to do with the fundraising project carried out in Chicago on October 14th. The federally-registered "Illinois Victory '96" committee was never used by the DNC, the DSCC, or any other entity.

9804336237C

CONCLUSION

In short, the DNC's involvement in this MUR results from a coincidence, and simple misunderstanding. The "Illinois Victory '96" registered with the FEC had nothing to do with the "Illinois Victory '96" fundraiser evidently held by Friends of Dick Durbin and United Democrats of Illinois. Furthermore, the DNC was not at all involved in the Chicago fundraiser, and other than the coincidental use of "Illinois Victory '96," the complaint offers no proof the DNC was involved directly with that event.

Therefore, given that the DNC's enclosed bank statements demonstrate that the "Illinois Victory '96" committee never raised or expended any funds (other than for bank charges), the Commission should find no reason to believe the DNC violated any provisions of the FECA or Commission regulations with respect to the activities alleged in the Illinois Republican Party's complaint.

Thank you for your time and consideration.

Sincerely,

Joseph E. Sandler, General Counsel
Neil P. Reiff, Deputy General Counsel

Attachments (6)

2804336237

NationsBank

Statement Of Account

P.O. BOX 27025, VA2-125-04-01
RICHMOND, VA 23261-7025

ILLINOIS VICTORY '96
430 S CAPITOL ST SE
WASHINGTON DC 20003-4024 1/5

PAGE 1

Last Statement Date	Current Statement Date
00/00/00	09/30/96

For Information Regarding Your Account Call: (800) 595-2180

Your Account Number: 19 3319 4545

Items Enclosed: 0

3010222 - SPECIAL INDUSTRIES
FULL ANALYSIS CHECKING ACCOUNT TAX-ID: 60

Balance Last Statement	We Have Added		We Have Subtracted		New Balance As Of
	Number	Amount	Number	Amount	
000	1	3700	2	3700	000

SOMETHING BIG IS COMING. GET READY FOR A NEW WAY OF BANKING -- MORE CHOICES, NEW OPPORTUNITIES AND CHANGES TO YOUR ACCOUNTS. AND NEXT MONTH, LOOK FOR A NEW, IMPROVED STATEMENT.

Posting Date	Transaction Description	Reference Number	Transaction Amount
09/26	CHECK ORDER FEE 960921 W86484400132400	902009268043925	16.00
09/26	CHECK ORDER FEE 960921 W86482530356400	902009268043926	21.00
09/27	FUNDS TRANSFER CREDIT FDES NDC 3010210 8905133	945009272100003	37.00+

DAILY LEDGER BALANCE SUMMARY:

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
09/26	37.00-	09/27	0.00		

AVERAGE DAILY LEDGER BALANCE FROM 09/01 TO 09/30 ..... 2.05-

AVERAGE DAILY COLLECTED BALANCE FROM 09/01 TO 09/30 ..... 2.05-

****
* ACCOUNT INFORMATION FOR HEARING IMPAIRED (TTY) *
* IS AVAILABLE BY CALLING: 1-800-554-3788 *
****

* WHERE THIS ASTERISK IS SHOWN, A PRECEDING CHECK (OR CHECKS) IS STILL OUTSTANDING, IS INCLUDED IN A SUMMARY LISTING

The total(s) represents the correct amount of money you have in the bank. Please examine at once. If no error is reported within 14 days, your account will be

PAGE 1

P.O. BOX 27025, VA2-125-04-01
RICHMOND, VA 23261-7025

09/30/96 10/31/96

ILLINOIS VICTORY '96
430 S CAPITOL ST SE
WASHINGTON DC 20003-4024

(800) 595-2180

19 3319 4545

3010221 - CORPORATE SERVICES
FULL ANALYSIS CHECKING ACCOUNT

TAX-ID: DT 0

000	2	2601	2	2601	000

10/22	SEPT 96 ACCT ANALYSIS CHARGE	940310220031172	13.01
10/25	FUNDS TRANSFER CREDIT FDES NDC 5018446 2328964	945010254460114	13.00-
10/25	SERVICE CHARGE REFUND FDES NDC 3010210 8905133	945010252100001	13.01-
10/28	SERVICE CHARGE DEBIT FDES NDC 3010210 8905133	945010282100002	13.00

DAILY LEDGER BALANCE SUMMARY:

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
10/22	13.01-	10/25	13.00	10/28	0.00

AVERAGE DAILY LEDGER BALANCE FROM 10/01 TO 10/31 ..... 0.00

AVERAGE DAILY COLLECTED BALANCE FROM 10/01 TO 10/31 ..... 0.00

****
* ACCOUNT INFORMATION FOR HEARING IMPAIRED (TTY) *
* IS AVAILABLE BY CALLING: 1-800-554-3788 *
****

NationsBank

P.O. BOX 27025, VA2-125-04-01
RICHMOND, VA 23261-7025

ILLINOIS VICTORY '96
430 S CAPITOL ST SE
WASHINGTON DC 20003-4024

3010221 - CORPORATE SERVICES
FULL ANALYSIS CHECKING ACCOUNT TAX-ID: RS

Statement Of Account

PAGE 1

Last Statement Date	Current Statement Date
10/31/96	11/07/96

For Information Regarding Your Account Call: (800) 595-2180

Your Account Number: 19 3319 4545

Items Enclosed: 0

Balance Last Statement	We Have Added		We Have Subtracted		Resulting In A Balance Of
	Number	Deposits Totaling	Number	Items Totaling	
0.00	0	0.00	0	0.00	0.00

Posting Date	Transaction Description	Reference Number	Transaction Amount

****
* ACCOUNT INFORMATION FOR HEARING IMPAIRED (TTY) *
* IS AVAILABLE BY CALLING: 1-800-554-3788 *
****

0304336292

* WHERE THIS ASTERISK IS SHOWN, A PRECEDING CHECK (OR CHECKS) IS STILL OUTSTANDING, IS INCLUDED IN A SUMMARY LISTING, OR HAS BEEN INCLUDED IN A PREVIOUS STATEMENT

The total(s) represents the correct amounts of money you have in the bank. Please examine at once. If no error is reported within 14 days, your account will be considered correct.

NationsBank

Statement Of Account

PAGE 1

P.O. BOX 27025, VA2-125-04-01
RICHMOND, VA 23261-7025

ILLIONOIS VICTORY '96
NON FEDERAL ACCOUNT
430 S CAPITOL ST SE
WASHINGTON DC 20003-4024

Last Statement Date	Current Statement Date
00/00/00	09/30/96

For Information Regarding Your Account Call

(800) 595-2180

Your Account Number

19 3319 4561

Items Enclosed

0

3010222 - SPECIAL INDUSTRIES
FULL ANALYSIS CHECKING ACCOUNT TAX-ID: 60

Balance Last Statement	We Have Added		We have Subtracted		Resulting In A Balance Of
	Number	Deposits Totaling	Number	Items Totaling	
000	1	3700	2	3700	000

SOMETHING BIG IS COMING. GET READY FOR A NEW WAY OF BANKING -- MORE CHOICES, NEW OPPORTUNITIES AND CHANGES TO YOUR ACCOUNTS. AND NEXT MONTH, LOOK FOR A NEW, IMPROVED STATEMENT.

Posting Date	Transaction Description	Reference Number	Transaction Amount
09/26	CHECK ORDER FEE 960921 W86484420132400	902009268043929	16.00
09/26	CHECK ORDER FEE 960921 W86482550356400	902009268043930	21.00
09/27	FUNDS TRANSFER CREDIT FDES NDC 3010210 8905133	945009272100005	37.00+

DAILY LEDGER BALANCE SUMMARY:

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
09/26	37.00-	09/27	0.00		

AVERAGE DAILY LEDGER BALANCE FROM 09/01 TO 09/30 ..... 2.05-

AVERAGE DAILY COLLECTED BALANCE FROM 09/01 TO 09/30 ..... 2.05-

****
* ACCOUNT INFORMATION FOR HEARING IMPAIRED (TTY) *
* IS AVAILABLE BY CALLING: 1-800-554-3788 *
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PAGE 1

P.O. BOX 27025, VA2-125-04-01
RICHMOND, VA 23261-7025

09/30/96 10/31/96

ILLINOIS VICTORY '96
NON-FEDERAL ACCOUNT
430 S CAPITOL ST SE
WASHINGTON DC 20003-4024

(800) 595-2180

19 3319 4561

3010221 - CORPORATE SERVICES
FULL ANALYSIS CHECKING ACCOUNT

DT
TAX-ID: 0

000	2	2601	2	2601	000

10/22	SEPT 96 ACCT ANALYSIS CHARGE	940310220031174	13.01
10/25	FUNDS TRANSFER CREDIT FDES NDC 5018446 2328964	945010254460118	13.00
10/25	SERVICE CHARGE REFUND FDES NDC 3010210 8905133	945010252100002	13.01-
10/28	SERVICE CHARGE DEBIT FDES NDC 3010210 8905133	945010282100003	13.00

DAILY LEDGER BALANCE SUMMARY:

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
10/22	13.01	10/25	13.00	10/28	0.00

AVERAGE DAILY LEDGER BALANCE FROM 10/01 TO 10/31 ..... 0.00

AVERAGE DAILY COLLECTED BALANCE FROM 10/01 TO 10/31 ..... 0.00

****
* ACCOUNT INFORMATION FOR HEARING IMPAIRED (TTY) *
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NationsBank

P.O. BOX 27025, VA2-125-04-01
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ILLIONOIS VICTORY '96
NON-FEDERAL ACCOUNT
430 S CAPITOL ST SE
WASHINGTON DC 20003-4024

Statement Of Account

PAGE 1

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10/31/96	11/07/96

For Information Regarding Your Account Call: (800) 595-2180

Your Account Number: 19 3319 4561

Items Enclosed: 0

3010221 - CORPORATE SERVICES
FULL ANALYSIS CHECKING ACCOUNT

TAX-ID: RS

Balance Last Statement	We Have Added		We Have Subtracted		Resulting In A Balance Of
	Number	Deposits Totaling	Number	Items Totaling	
0.00	0	0.00	0	0.00	0.00

Posting Date	Transaction Description	Reference Number	Transaction Amount

****
* ACCOUNT INFORMATION FOR HEARING IMPAIRED (TTY) *
* IS AVAILABLE BY CALLING: 1-800-554-3788 *
****

0 0 4 3 8 6 2 3 2

* WHERE THIS ASTERISK IS SHOWN, A PRECEDING CHECK (OR CHECKS) IS STILL OUTSTANDING, IS INCLUDED IN A SUMMARY LISTING, OR HAS BEEN NOTED IN A PREVIOUS STATEMENT

The total(s) represents the correct amount of money you have in the bank. Please examine at once. If no error is reported within 14 days, your account will be considered correct.

ADDUCCI, DORF, LEHNER, MITCHELL & BLANKENSHIP, P.C.

ATTORNEYS AT LAW

SUITE 2130
150 NORTH MICHIGAN AVENUE
CHICAGO, ILLINOIS 60601-7524

TELEPHONE (312) 781-2800
FACSIMILE (312) 781-2811

Michael C. Dorf
Direct Dial (312) 781-2806

November 27, 1996

BY FACSIMILE
AND U.S. MAIL

Federal Election Commission
Office of the General Counsel
999 E Street, N.W.
Washington, D. C. 20463
Attention: Ms. Alva E. Smith

Re: MUR 4572

DEC 3 11 29 AM '96
FEDERAL ELECTION COMMISSION OFFICE OF GENERAL COUNSEL

0804362372

Dear Ms. Smith:

As we discussed this morning, I am General Counsel of the Democratic Party of Illinois, which has been named as a respondent in the above referenced matter. I have enclosed a Statement of Designation of Counsel, executed by John Gianules, Treasurer of the Democratic Party of Illinois, designating me and William R. Quinlan, Esq. as Counsel in this matter.

The letter from the Federal Election Commission notifying us of the commencement of MUR 4572 was received on November 18, 1996, and a response would be due on December 3, 1996. Due to the interposition of the Thanksgiving holiday weekend, however, the availability of many of the parties from whom we need to seek information is severely limited. Accordingly, in order for us to investigate thoroughly the facts alleged in the complaint and to prepare an appropriate response, the Democratic Party of Illinois requests a two week extension of time for good cause, to Tuesday, December 17, 1996, to reply to the complaint.

Please call me if you have any questions or need any additional information. I hope the Commission will respond favorably to our request.

Sincerely,

Michael C. Dorf

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4572

NAME OF COUNSEL: (1) Michael C. Dorf (2) William R. Quinlan

FIRM: Adducci, Dorf, Lehner, Mitchell & Blankenship, P.C. | Quinlan & Crisham

ADDRESS: 150 N. Michigan Ave. Suite 2130, Chicago, IL 60601 | 161 N. Clark Street Suite 2300, Chicago, IL 60601

TELEPHONE: 312/781-2800 | 312/263-0900

FAX: 312/781-2811 (fax) | 312/263-5013

TELEPHONE:(____)_____

FAX:(____)_____

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.

11-27-96
Date

Signature

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
DEC 3 11 29 AM '96

RESPONDENT'S NAME: JOHN A. GIANULIS, TREASURER

ADDRESS: DEMOCRATIC PARTY OF ILLINOIS
489 MERCHANDISE MART
CHICAGO IL 60654

TELEPHONE: HOME(309) 798-2623

BUSINESS(312) 464-1900

9804386237 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 3, 1996

Michael C. Dorf, Esquire
ADDUCCI, DORF, LEHNER, MITCHELL & BLANKENSHIP, P.C.
150 N. Michigan Avenue, Suite 2130
Chicago, IL 60601

William R. Quinlan, Esquire
QUINLAN & CRISHAM
161 N. Clark Street, Suite 2300
Chicago, IL 60601

RE: MUR 4572
Democratic Party of Illinois
John A. Gianules, as treasurer

Dear Messrs. Dorf and Quinlan:

This is in response to your letter dated November 27, 1996, which we received on that day, requesting a 14 day extension to respond to the complaint filed in the above-noted matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on December 17, 1996.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Alva E. Smith, Paralegal
Central Enforcement Docket

0804336233

Dick Durbin
U S SENATE

Dec 9 10 22 AM '96

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL

December 4, 1996

Via Fax & U.S. Mail

Mr. F. Andrew Turley
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Mr. Turley

As Treasurer of Friends of Dick Durbin, I am responding to your recent letter with regard to a pending Matter Under Review #4572.

After a cursory review of the complaint in question I am confident our campaign can provide copies of all the necessary filings which would rebut the allegations made. However, the complaint also named several other parties. Due to post-election vacations and the holiday season it has been impossible to contact all the knowledgeable parties necessary to provide the Commission with a complete response which I am sure would cause the expeditious dismissal of this complaint.

Therefore, we respectfully ask for a two week extension of time, until Friday, December 20, 1996, to fully and completely reply to the complaint.

In advance, I thank you for your consideration and hope the Commission will consider our request favorably.

Sincerely,

Michael E. Daly

Michael E. Daly
Treasurer

Paid for by
Friends of Dick Durbin
500 N. Dearborn, Suite 500 • Chicago, IL 60610 P. O. Box 1949 • Springfield, IL 62705

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 9, 1996

Michael E. Daly, Treasurer
Friends of Dick Durbin Committee
PO Box 1949
Springfield, IL 62705

RE: MUR 4572

Dear Mr. Daly:

This is in response to your letter dated December 4, 1996, which we received on December 6, 1996, requesting an extension until December 20, 1996, to respond to the complaint filed in the above-noted matter. Although your request is made after the due date of your response, after considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on December 20, 1996.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Alva E. Smith, Paralegal
Central Enforcement Docket

2304363233

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. · WASHINGTON, D.C. 20005-2011
TELEPHONE: 202 628-6600 · FACSIMILE: 202 434-1690

December 20, 1996

DEC 20 3 31 PM '96

Lawrence Noble, Esq.
Federal Election Commission
6th Floor
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 4572

Dear Mr. Noble:

This letter constitutes the response of the Democratic Senatorial Campaign Committee ("DSCC"), and Paul Johnson, as treasurer, to the Illinois Republican Party's complaint dated November 1, 1996, and designated MUR 4572 by the Commission. Because the Illinois Republican Party's complaint fails to demonstrate a violation of the Federal Election Campaign Act (the "Act") by the DSCC, the DSCC requests that the Commission find no reason to believe the DSCC committed any violation of the Act and dismiss the complaint accordingly.

On September 18, 1996, the DSCC and the Democratic National Committee ("DNC") filed a Statement of Organization for "Illinois Victory '96," which was established to be a joint fundraising committee to raise federal and nonfederal funds for the DSCC and DNC at an event scheduled for late September, 1996. That event was subsequently canceled, and therefore, other than for bank charges, no funds were ever raised or spent in connection with this project.

Quite apart from the DSCC's and DNC's proposed joint fundraiser in September, it appears from the documents in the complaint that Friends of Dick Durbin and the United Democrats of Illinois apparently arranged for an October 14 fundraising project under the name "Illinois Victory '96." The invitation for that event, which is attached to the Illinois Republican Party's complaint, demonstrates that it was unrelated to the DSCC. Specifically, the invitation states:

This is a joint fundraising event for Friends of Dick Durbin and United Democrats of Illinois. Please make checks payable to 'Illinois Victory '96.'

Paid for by Illinois Victory '96, c/o Friends of Dick Durbin, 54 W. Illinois, #500, Chicago, Illinois 60610. Please RSVP to 312/832-9600 or fax to 312/832-0468. Contributions to this committee are not deductible for federal income tax purposes.

The joint fundraising committee registered by the DSCC and DNC was unrelated to the fundraiser complained of by the Illinois Republican Party. Indeed, as noted above, the DSCC/DNC registered Illinois Victory '96 Committee was never use for any fundraising event. It appears that the DSCC's involvement in this MUR resulted from a misunderstanding on the part of the Illinois Republican Party. In light of this fact, the Commission should find no reason to believe the DSCC violated any provision of the Act and should promptly dismiss the complaint.

Very truly yours,

Marc E. Elias
Counsel for Democratic Senatorial
Campaign Committee

MEE:dml

QUINLAN & CRISHAM, LTD.

WILLIAM R. QUINLAN
THOMAS M. CRISHAM
MARY PATRICIA RYAN
MICHAEL C. BRYCE
JAMES B. CARROLL

THOMAS C. HOWBAUER
JOHN F. KENNEDY
JEFFREY T. RUBIS
MICHAEL I. ROTHSTEIN
CAESAR A. TABET

ATTORNEYS AT LAW

WRITER'S DIRECT DIAL
(312) 917-8475

DAVID M. JENKINS
MICHAEL W. KIRK
KELLY A. O'CONNOR
JOHN P. O'MALLEY
DANIEL L. STANNER
CATHERINE J. CASEY

MARK L. DURBIN
JAMES A. NIEWIARA
SCOTT L. BRAUM
J. JEFFREY PATTON
JENNIFER F. BRAMER
JENNIFER R. CONRADO
LAWRENCE J. MORRISSEY

December 19, 1996

DEC 20 8 14 AM '96
FEDERAL ELECTION COMMISSION OFFICE OF GENERAL COUNSEL

Alva E. Smith, Paralegal
Central Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

Re: Federal Election Commission v. Friends of Dick Durbin, et al.; No. MUR4572.

2304386223377

Dear Ms. Smith:

As we discussed, this law firm has been retained to represent Friends of Dick Durbin and Illinois Victory '96 both of which have been named as respondents in the above-referenced matter. I have enclosed a Statement of Designation of Counsel, duly executed, designating William R. Quinlan, John F. Kennedy and John O'Malley as counsel in this matter.

As we also discussed, we were very recently retained to represent Friends of Dick Durbin and Illinois Victory '96. Our clients are in the process of assembling all necessary documents so that we can prepare a response. Accordingly, in order to investigate thoroughly the facts alleged in the complaint, and to prepare an appropriate response, Friends of Dick Durbin and Illinois Victory 96 request an extension of time for good cause to January 15, 1997. We understand that the FEC has no objection to an extension of time to December 31, 1996 and we appreciate consideration of additional time in which to respond due to the upcoming holidays and the unavailability of certain witnesses during the holiday season.

Please call me if you have any questions or need any additional information. I hope the Commission will respond favorably to our request.

Very truly yours,

John F. Kennedy

JFK:kr
cc: W. Quinlan
J. O'Malley
M. Houlihan

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4572

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
Dec 20 8 14 AM '96

NAME OF COUNSEL: William R. Quinlan, John F. Kennedy, and John O'Malley
FIRM: Quinlan & Crisham, Ltd.
ADDRESS: 161 N. Clark, Suite 2300
Chicago, Illinois 60601

TELEPHONE: (312) 263-0900
FAX: (312) 263-5013

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

12/19/96
DATE

Dick Durbin
SIGNATURE

RESPONDENT'S NAME: Friends of Dick Durbin and Illinois Victory '96

ADDRESS: 500 N. Dearborn Suite 500
Chicago Illinois 60610

TELEPHONE: (312) 832-9600

9304338623738

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

William R. Quinlan, Esq.
John F. Kennedy, Esq.
John O'Malley, Esq.
QUINLAN & CRISHAM, LTD.
161 N. Clark, Suite 2300
Chicago, IL 60601

December 30, 1996

RE: MUR 4572
United Democrats of Illinois
John A. Gianules, Treasurer

Dear Messrs. Quinlan, Kennedy, and O'Malley:

The Federal Election Commission received a complaint which indicates that your clients, United Democrats of Illinois and John A. Gianules, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4572. Please refer to this number in all future correspondence.

The complaint was not sent to your clients earlier because we were unable to identify a valid address. Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against your clients in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain 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 matter to be made public.

Celebrating the Commission's 20th Anniversary
YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosures
1. Complaint
2. Procedures

2804386234C

QUINLAN & CRISHAM, P.C.

WILLIAM R. QUINLAN
THOMAS M. CRISHAM
MARY PATRICIA BENZ
MICHAEL C. BRUCK
JAMES R. CARROLL
THOMAS C. HOFBAUER
JOHN F. KENNEDY
JEFFREY T. KUBES
MICHAEL I. ROTHSTEIN
CAESAR A. TABET

ATTORNEYS AT LAW

WRITER'S DIRECT DIAL
(312) 917-8475

DAVID M. JENKINS
MICHAEL W. KIER
KELLY A. O'CONNOR
JOHN P. O'MALLEY
DANIEL L. STANNER
CATHERINE J. CASEY
MARK L. DURBIN
JAMES A. NIEWIARA
SCOTT L. BRAUM
J. JEFFREY PATTON
JENNIFER E. BERNER
JENNIFER K. DART
LAWRENCE J. MORRISSEY
LISA M. HEGEDUS

December 20, 1996

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
DEC 25 9 53 AM '96

VIA FACSIMILE & U.S. MAIL

Alva E. Smith, Paralegal
Central Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

Re: Federal Election Commission v. Friends of Dick Durbin, et al.; No. MUR4572.

Dear Ms. Smith:

As we discussed, this law firm has recently been retained to represent United Democrats of Illinois which has been named as a respondent in the above-referenced matter. I have enclosed a Statement of Designation of Counsel, duly executed, designating William R. Quinlan, John F. Kennedy and John O'Malley as counsel in this matter.

As we also discussed, we were very recently retained to represent Friends of Dick Durbin, Illinois Victory '96 and the Democratic Party of Illinois in this action. Our clients are in the process of assembling all necessary documents so that we can prepare a response. As you know, we intend to file a single response on behalf of all these entities. We believe this will greatly simplify the issues for the Commission. Accordingly, in order to investigate thoroughly the facts alleged in the complaint, and to prepare an appropriate response, we request an extension of time for good cause to January 15, 1997 for all respondents. We appreciate consideration of this request for additional time in which to respond to the MUR. As you can imagine, the upcoming holidays and the unavailability of certain witnesses during the holiday season have complicated and delayed our investigation of this MUR, despite our best efforts.

Please call me if you have any questions or need any additional information. Please advise. Thank you for your consideration of this matter.

Happy Holidays,

John F. Kennedy

cc: William R. Quinlan
John O'Malley
Margaret Houlihan

STATEMENT OF DESIGNATION OF COUNSEL

Dec 26 9 53 AM '96
FEDERAL ELECTION COMMISSION OFFICE OF GENERAL COUNSEL

MUR 4572

NAME OF COUNSEL: William R. Quinlan, John F. Kennedy, and John O'Malley
FIRM: Quinlan & Crisham, Ltd.
ADDRESS: 161 N. Clark, Suite 2300
Chicago, Illinois 60601

TELEPHONE: (312) 263-0900
FAX: (312) 263-5013

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

12/18/96
DATE

SIGNATURE

RESPONDENT'S NAME: United Democrats of Illinois

ADDRESS: 160 N. LaSalle St. Suite 600
Chicago Illinois 60601

TELEPHONE: (312) 814-4881

2304336623412

FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

John F. Kennedy, Esquire
Quinlan & Crisham, Ltd.
161 N. Clark, Suite 2300
Chicago, IL 60601
-VIA FAX-

December 27, 1996

FAXED 12/27/96

re: MUR 4572

Dear Mr. Kennedy:

It was a pleasure speaking with you this morning relative to the above-captioned Matter Under Review (MUR).

Your request for enlargement of time to respond on behalf of your clients is approved through December 31, 1996, based upon good cause shown. Extensions beyond this date require approval by the Commission. We are willing to recommend approval of your request for extension until Friday, January 31, 1997, based upon our discussion and prior correspondence with our office.

Since we have received several letters and phone calls from your office on this issue, we would be most appreciative if you could consolidate these communications into a single letter, addressed to me, which formally requests a further extension until Friday, January 31, 1997, with appropriate citation to the reasons for this requested delay. Please fax the letter to me at your earliest convenience at (202) 219-3923. Upon receipt of your letter, we will prepare and forward a memorandum to the Commission, with your extension request attached, recommending favorable action on your request. As I am sure you understand, final decision of this matter rests entirely with the Commission; we cannot provide any assurance of favorable Commission action on your request.

I also understand from our discussion that you also represent the treasurers of both the Friends of Dick Durbin and United Democrats of Illinois, as well as Senator-elect Durbin personally. Since the Designations of Counsel in our file do not clearly indicate your representation of these respondents, we would be most appreciative if you could forward to us executed copies of Designations of Counsel from each at your earliest convenience.

Many thanks for your consideration. We look forward to hearing from you further on this matter in the very near future. If we can provide any further assistance, please do not hesitate to call Ms. Alva Smith or me at (202) 219-3690.

Very truly yours,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

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QUINLAN & CRISHAM, LTD.

WILLIAM R. QUINLAN
THOMAS M. CRISHAM
MARY PATRICIA BENZ
MICHAEL C. BRUCK
JAMES R. CARROLL

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MARK L. DURBIN
JAMES A. NIEWIARA
SCOTT L. BRAUM
J. JEFFREY PATTON
JENNIFER E. BERNER
JENNIFER K. CORRADO
LAWRENCE J. MORRISSEY

December 30, 1996

VIA U.S. MAIL & FACSIMILE (202) 219-3923

Mr. F. Andrew Turley
Supervisory Attorney
Federal Election Commission
Washington, D.C. 20463

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FEDERAL ELECTION COMMISSION OFFICE OF GENERAL COUNSEL

Re: MUR4572

Dear Mr. Turley:

As we discussed, this law firm represents several respondents in the above-referenced action, including the United Democrats of Illinois, Friends of Dick Durbin, Illinois Victory '96, the Democratic Party of Illinois, and the treasurers of these respective organizations. Designation of counsel statements for the subject treasurers will follow shortly. I will advise you regarding our representation of Senator Durbin.

On November 18, 1996, we received a letter from the Federal Election Commission ("FEC") notifying us of the commencement of MUR 4572. On December 3, 1996, we were granted a 14 day extension in which to file our response on behalf of the Democratic Party of Illinois and its treasurer, John Gianules. On December 20, 1996, we requested an extension of time for good cause to January 15, 1997 in which to file a response on behalf of all respondents due to the holidays and the further unavailability of parties from whom we needed additional information to prepare our response.

Per our conversation of Friday, December 27, 1996, we are formally resubmitting our request for an enlargement of time for good cause to January 31, 1997, in which to file our response on behalf of all respondents. We require this extension of time to conduct a thorough investigation of the subject MUR and prepare appropriate responses to the multiple respondents. This investigation has been understandably delayed due to the holiday season. Consequently, on behalf of the respondents, we request an enlargement of time to January 31, 1997 in which to respond to this subject MUR.

Thank you for your consideration of this matter.

Very truly yours,

John F. Kennedy

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 4572

NAME OF COUNSEL: William R. Quinlan, John P. Kennedy, and John O'Malley
FIRM: Quinlan & Crishan, Ltd.
ADDRESS: 161 N. Clark, Suite 2300
Chicago, Illinois 60601

TELEPHONE: (312) 263-0900
FAX: (312) 263-5013

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

30 Dec 96
DATE

Richard Durbin
SIGNATURE

RESPONDENT'S NAME: Senator Richard Durbin

ADDRESS: 500 N. Dearborn Suite 500
Chicago Illinois 60610

TELEPHONE: (312) 832-9600

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 4872

NAME OF COUNSEL: William R. Quinlan, John F. Kennedy, and John O'Malley
FIRM: Quinlan & Ortshan, Ltd.
ADDRESS: 161 N. Clark, Suite 2300
Chicago, Illinois 60601

TELEPHONE: (312) 263-0800
FAX: (312) 263-5013

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

12.31.96
DATE

SIGNATURE

RESPONDENT'S NAME: Michael Daly, Treasurer, Friends of Dick Durbin

ADDRESS: 500 N. Dearborn Suite 500
Chicago Illinois 60610

TELEPHONE: (312) 832-9600

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Jan 9 10 25 AM '97

FEDERAL ELECTION COMMISSION
Washington, DC 20463

SENSITIVE

MEMORANDUM

January 8, 1997

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

F. Andrew Turley
Supervisory Attorney, CED

SUBJECT: MUR 4572: Request for Extension of Time to Respond by Respondents: Democratic Party of Illinois, and John A. Gianulis, as treasurer; Friends of Dick Durbin, and Michael Daly, as treasurer; The Honorable Richard Durbin; and United Democrats of Illinois, and John A. Gianulis, as treasurer

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I. BACKGROUND

On November 6, 1996, Harold B. Smith, Chairman of the Illinois Republican Party, filed the complaint located at Attachment 1. We subsequently provided timely notice to all but one of the identified respondents, the United Democrats of Illinois, by letters dated November 13, 1996.[1] On November 27, 1996, Michael Dorf, counsel for the Democratic Party of Illinois and John A. Gianulis, as treasurer, requested a 14 day extension to respond to the complaint.[2] On December 4, 1996, Michael E. Daly, treasurer for Friends of Dick Durbin, requested a 19-day extension. Both extensions were granted. Sometime shortly

[1] United Democrats of Illinois was not notified because this office was unable to identify a valid address using FEC and outside resources at that time.

[2] The Democratic Party of Illinois and John A. Gianulis, treasurer, are represented by Michael Dorf of ADDUCCI, DORF, LEHNER, MITCHELL & BLANKENSHIP, P.C. and John F. Kennedy, William R. Quinlan, and John O'Malley of QUINLAN & CHRISHAM.

thereafter, John F. Kennedy of QUINLAN & CHRISHAM assumed representation of all of the above-captioned respondents.

By letter dated December 20, 1996 and received on December 26, 1996 (located at Attachment 2), Mr. Kennedy requested a further extension until January 15, 1997. In support of his request, he cited his recent retention as counsel for some of the respondents, his need to investigate the underlying facts, and the unavailability of certain witnesses during the holiday period. Mr. Kennedy attached to his letter a Statement of Designation of Counsel for the United Democrats of Illinois, the one respondent whose address we were unable to locate, despite a diligent search. We immediately sent a notification letter to the United Democrats of Illinois.

In a telephone conversation on December 27, 1996, we advised Mr. Kennedy that we could only grant his request for extension for 30 days; authority for approval of any further extension to respond rested solely with the Commission.[3] We also advised Mr. Kennedy that we had not formally notified his client, United Democrats of Illinois, of the complaint because of our inability to locate a valid address, but that formal notification was on its way. After further discussion of the circumstances presented, and his expressed desire to submit coordinated responses on behalf of all of his clients at the same time, he sought a further extension until January 31, 1997. By letter dated December 30, 1996, respondents' counsel formally requested extension of the time to respond on behalf of all his clients until January 31, 1997 (Attachment 4), citing as good cause for this request his need for sufficient time to conduct a thorough investigation of the issues raised in the complaint and to prepare appropriate responses for multiple respondents.

II. DISCUSSION.

Though arguably some respondents appear to have been slow to seek counsel, Mr. Kennedy has demonstrated reasonable diligence in undertaking representation of these respondents and following up appropriately with our office. His request for a further extension is not unreasonable, given the unfortunate disruption of his efforts to investigate and respond to the allegations in the complaint caused by the holiday season and unavailability of certain persons. Though he initially requested an extension only to January 15, 1997, grant of the extension until January 30, 1997, the due date for response by his client United Democrats of Illinois, will provide him with sufficient time to investigate, and accords with his expressed desire to file coordinated responses on

[3] Our letter summarizing the December 27, 1996 discussion, faxed to him on the same day, is located at Attachment 3.

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behalf of all his clients at the same time. Grant of the extension will not unduly delay processing of the case and will help to ensure that the Commission has the benefit of thorough responses by each of these respondents in evaluating the merits of complaint.

III. RECOMMENDATION.

Grant the respondents' request for an extension of time to respond until January 31, 1997.

Staff Assigned: Alva E. Smith, CED

Attachments

1. Complaint
2. Request for Extension until January 15, 1997
3. Letter Granting Extension until December 31, 1996
4. Request for Extension until January 31, 1997

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Democratic Party of Illinois and John A. Gianulis, as treasurer;	)	
Friends of Dick Durbin and Michael Daly, as treasurer;	)	MUR 4572
The Honorable Richard Durbin;	)	
United Democrats of Illinois and John A. Gianulis, as treasurer--	)	
Request for Extension of Time to Respond.	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 14, 1997, the Commission decided by a vote of 5-0 to grant the respondents' request for an extension of time to respond until January 31, 1997, as recommended in the General Counsel's Memorandum dated January 8, 1997.

Commissioners Aikens, Elliott, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

1-15-97
Date

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

Received in the Secretariat: Thurs., Jan. 09, 1997 10:25 a.m.
Circulated to the Commission: Thurs., Jan. 09, 1997 4:00 p.m.
Deadline for vote: Tues., Jan. 14, 1997 4:00 p.m.

bjr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 16, 1997

John F. Kennedy, Esquire
QUINLAN & CRISHAM, LTD
161 N. Clark, Suite 2300
Chicago, IL 60601

RE: MUR 4572

Dear Mr. Kennedy,

Your December 30, 1996, request for an extension of time to respond to the complaint filed in the above-noted matter as been granted by the Commission. Accordingly, your response is due by the close of business on January 31, 1997.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Alva E. Smith, Paralegal
Central Enforcement Docket

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QUINLAN & CRISHAM, LTD.

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THOMAS M. CRISHAM
MARY PATRICIA BENZ
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J. JEFFREY PATTON
JENNIFER F. BERNER
JENNIFER K. CORRADO
LAWRENCE J. MORRISSEY

January 31, 1997

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VIA OVERNIGHT

Mr. F. Andrew Turley
Supervisory Attorney
Federal Election Commission
Washington, D.C. 20463

Re: Federal Election Commission Matter Under Review 4572

Dear Mr. Turley:

Enclosed please find the Response of Illinois Victory '96, United Democrats of Illinois, Friends of Dick Durbin, Senator Dick Durbin, Illinois Democratic Party, John Gianules as Treasurer of United Democrats of Illinois and the Illinois Democratic Party, Michael Daly as Treasurer of Friends of Dick Durbin, and Michael Tramantino as Treasurer of Illinois Victory '96 to the Complaint filed in this Matter Under Review 4572. Thank you for your cooperation in this matter. Please contact us if you have any comments or questions.

Very truly yours,

John F. Kennedy

JFK\cln

161 NORTH CLARK STREET • SUITE 2300 • CHICAGO, ILLINOIS 60601 • TELEPHONE 312.263.0900 • FACSIMILE 312.263.5013 • QUINLANCRISHAM@QCLAW.COM

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

IN THE FEDERAL ELECTION COMMISSION

FEB 4 10 32 AM '97

IN RE: ILLINOIS VICTORY '96, UNITED DEMOCRATS OF ILLINOIS, FRIENDS OF DICK DURBIN, SENATOR DICK DURBIN, ILLINOIS DEMOCRATIC PARTY, JOHN GIANULES as Treasurer of United Democrats of Illinois and the Illinois Democratic Party, MICHAEL DALY as Treasurer of the Friends of Dick Durbin, and MICHAEL TRAMANTINO as Treasurer of Illinois Victory '96.	)	**MUR 4572**

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RESPONDENTS' RESPONSE TO COMPLAINT

Respondents, Illinois Victory '96, United Democrats of Illinois, Friends of Dick Durbin, Senator Dick Durbin, the Illinois Democratic Party, John Gianules as Treasurer of United Democrats of Illinois, and the Illinois Democratic Party, Michael Daly as Treasurer of the Friends of Dick Durbin, and Michael Tramantino as Treasurer of Illinois Victory '96, (collectively referred to herein as "Respondents"), by and through their counsel, and for their Response to the Complaint filed November 1, 1996 by Harold B. Smith ("Complainant") of the Illinois Republican Party ("Complaint"), state as follows:

Introduction

The Complaint arises out of a joint fundraiser held in Chicago in which the First Lady, Hillary Clinton, appeared on behalf of Democratic candidates in Illinois (the "Fundraiser"). Two political committees, Friends of Dick Durbin and the United Democrats of Illinois ("UDI") created a joint fundraising committee, Illinois Victory '96, for the sole purpose of organizing the

First Lady fundraiser. As demonstrated below, this joint fundraiser was conducted in full compliance with FEC regulations, and was properly reported in compliance with FEC regulations.

The Federal Election Commission ("Commission") should take no further action, as none is warranted, on the Complaint filed by the Illinois Republican Party against the Respondents prior to the general election of November 5, 1996. The Complaint should be dismissed because it fails to conform to even the minimal pleading requirements of federal law. As a result, the Complaint unfairly prejudices the Respondents because it suggests that the Respondents violated federal election law but fails to state clearly any facts to support these claims. Further, the Complainant misapprehends both the facts and the law because it improperly attempts to impose reporting burdens on the Respondents where none exists under the law. Equally important, the Federal Election Commission ("Commission") should take no further action on the Complaint because, as set forth herein, the Respondents have substantially complied with all applicable rules and regulations.

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I. THE COMPLAINT SHOULD BE STRICKEN BECAUSE IT FAILS TO COMPLY WITH COMMISSION REGULATIONS.

A. Procedural History

On or about November 1, 1996, the Illinois Republican Party filed a Complaint with the Commission in which it suggested that the Respondents failed to accurately register committees and file reports of joint fundraising activity in connection with the Fundraiser.

On November 6, 1996, the Commission received the Complaint, and on or about November 13, 1996, the Commission notified the Respondents by mail of the Complaint and afforded the Respondents the opportunity to demonstrate in writing that no action should be

taken against Respondents in this matter, pursuant to the Federal Election Campaign Act of 1971 (the "Act").

On or about January 16, 1997, the Commission granted the Respondents an extension of time for good cause shown, to January 31, 1997, in which to respond to this matter and demonstrate that: (1) this matter does not warrant the use of Commission resources; and, (2) there is no reason to believe that the Respondents have committed, or are about to commit, any violation of the Act.

B. The Commission Should Not Expend its Limited Resources On This Matter Because The Complaint Is Deficient Under Commission Regulations And Is Factually Incoherent.

No action should be taken against the Respondents in this matter, nor should the Commission expend its limited resources to pursue this matter, because the Complaint is fatally deficient under Commission regulations. Indeed, the Complaint is not based on the personal knowledge of the Complainant and also fails to comply with the minimal requirements of Commission regulations regarding the substance, form and contents of a complaint. Moreover, the Complaint is factually incoherent and fails to clearly identify a single violation of the Act or the regulations.

The Complaint should be stricken because it fails to conform to 11 C.F.R. Section 111.4 of the Commission regulations. Section 111.4 mandates that a Complaint "shall comply" with the following requirements:

- All statements made in a complaint are subject to the statutes governing perjury and to 18 U.S.C. 1001. The complaint should differentiate between statements based upon personal knowledge and statements based upon information and belief.

- The complaint shall conform to the following provisions:

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(1) It should clearly identify as a respondent each person or entity who is alleged to have committed a violation;

(2) Statements which are not based upon personal knowledge should be accompanied by an identification of the source of information which gives rise to the complainants belief in the truth of such statements;

(3) It should contain a clear and concise recitation of the facts which describe a violation of a statute or regulation over which the Commission has jurisdiction, and

(4) It should be accompanied by any documentation supporting the facts alleged if such documentation is known of, or available to, the complainant.

11 C.F.R. §111.4. The Complaint wholly fails to meet these minimal pleading requirements.

For example, section 111.4(d)(4) provides that the Complaint shall "contain a clear and concise recitation of the facts which describe a violation of a statute of regulation over which the Commission has jurisdiction." Here, the Complaint fails to comply with Section 111.4(d)(4) and, as a result, unfairly prejudices the Respondents by forcing the Respondents to disprove vague and conclusory allegations of wrongdoing. It is impossible to tell from the four corners of the Complaint what regulations, if any, the Complainant contends were violated and by whom. The "Fact" section of the Complaint is conclusory and fails to set forth any coherent facts to predicate an alleged violation of the Act. The "Law" section of the Complaint contains a brief and disjointed summary of an instrument of Commission's regulations, without any explanation as to their relevance or application. Moreover, the "Analysis" section of the Complaint is not only vague and conclusory, but it also fails to allege any discrete violation of the Act or the rules and regulations.

Equally important, nowhere in the "Analysis" does the Complainant state that any of the Respondents violated any provision of the Act or its underlying regulations. Indeed, the

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Complainant's sole claim is that Illinois Victory '96 did not serve as a joint fundraising representative and did not abide by unspecified Commission regulations. Neither the Commission nor the Respondents should be forced to respond to a Complaint replete with vague and conclusory allegations of violations of federal election law. See, e.g., U.S. v. Dunkel 927 F.2d 955 (7th Cir. 1991)("courts are not like pigs, hunting for truffles buried in briefs"). This is particularly so because the Respondents have complied with the Commission's regulations, as demonstrated in Section II of this Response.

The Complaint also fails to satisfy the minimal pleading requirements set forth in Section 111.4(c) and 111.4(d)(2) and, as a result, the Respondents are unfairly prejudiced because they are compelled to defend against allegations based on speculation and hearsay. Section 111.4(c) provides that the Complaint shall "differentiate between statements based upon personal knowledge and statements based upon information and belief." Further, "statements which are not based upon personal knowledge should be accompanied by an identification of the source of information which gives rise to the complainant's belief in the truth of such statements." 11 C.F.R. §111.4(d)(2). Here, none of the allegations in the Complaint are based upon the Complainant's personal knowledge. Consequently, the Complainant is obligated to disclose the source of the information which gave "rise to Complainant's belief in the truth of such statements." The Complaint does not satisfy this obligation. There is nothing in the Complaint that identifies the primary source of the information relied upon by the Complainant to determine that veracity of the allegations in the Complaint. Indeed, the Complainant effectively concedes that no independent investigation was performed to substantiate any of the allegations. In fact, the Complaint relies in large part upon newspaper articles which are third-party hearsay reports

without any evidentiary value. Because these articles serve as the basis for the Complaint, the Complaint is fatally deficient under Section 111.4 and should be stricken.

Had the Complainant examined the record, it would have found that the allegations are baseless. As set forth below and contrary to the allegations of the Complaint, Illinois Victory '96 has, in fact, registered as a joint fundraising representative and has fully disclosed all receipts and disbursements arising from the Fundraiser as required by law.

1. The Complaint Does Not Include Supporting Documentation.

In addition, Section 111.4(d)(4) provides that a complaint shall be accompanied by documentation supporting the facts alleged, if such documentation is available to the complainant. The Complainant failed to comply with Section 111.4(d)(4) and attach relevant documents to the Complaint. The probative and exculpatory documents were readily available to the Complainant at or about the time of filing, and the Complainant did not append any of these documents to the Complaint. These documents demonstrate that no further action from the Commission is warranted because the Respondents substantially complied with federal election law. In failing to investigate these documents, Respondents and the Commission are forced to respond to a Complaint that is without merit.

2. There are No Allegations That Respondents Demonstrated Any Disregard for the Purposes of Full and Accurate Financial Disclosure Under the Law.

In the conclusion of the Complaint, the Complainant alleges that the Respondents have "demonstrated a general disregard for the purposes of full and accurate financial disclosure under the law." The Complainant also attests that it has filed a complaint with the Illinois State Board of Elections against the Respondents, accordingly. In doing so, the Complainant clearly leaves the impression that Respondents' alleged violations are the subject of an investigation with

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Illinois' election authorities in a blatant and improper attempt to bolster the credibility of the Complaint before the Commission. The Commission should reject these tactics and strike the Complaint.

Contrary to the representations made to the Commission under oath by the Complainant, the Illinois Republican Party has not instigated formal complaint proceedings against the Respondents with the Illinois State Board of Elections. According to the State Board of Elections, no complaint has ever been filed and none is pending as of the date of this Response. The Commission should, therefore, reject the tactics of the Complainant and take no further action with respect to the Complaint.

II. THE RESPONDENTS HAVE SUBSTANTIALLY COMPLIED WITH THE APPLICABLE JOINT FUNDRAISING REGULATIONS.

The Complainant misapprehends the facts and the law applicable to the Fundraiser. Because the Respondents' have substantially complied with all applicable regulations, the Commission should take no further action with respect to the Complaint.

A. The Joint Fundraising Representative Was Duly Authorized and Registered.

Contrary to the suggestion in the Complaint, the joint fundraising representative was duly authorized and registered to conduct the Fundraiser. The joint fundraising representative was Illinois Victory '96, and Illinois Victory '96 substantially complied with the joint fundraising regulations as set forth in 11 C.F.R. Section 102.17. Consequently, the Commission should take no further action on the Complaint or expend any further resources to investigate the unfounded allegations of the Complaint.

In accordance with the requirements of Section 102.17(a)(b) and (c), the United Democrats of Illinois and Friends of Dick Durbin entered into a joint fundraising agreement on

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October 7, 1996, which established Illinois Victory '96 as the fundraising representative for the Fundraiser. A copy of the Agreement is attached hereto as Exhibit 1.[1]

Pursuant to the Agreement, Illinois Victory '96 participated in only one joint fundraising event as contemplated by Section 102.17(a)(1)(i); namely, the Fundraiser. Moreover, Illinois Victory '96 properly registered with the Commission on November 4, 1996, as required under Section 102.17(a)(1)(i).[2] In addition, Illinois Victory '96 maintained and reported to the Commission a full accounting of all contributions and disbursements of the proceeds raised at the Fundraiser, as required under Section 102.17(b)(1).[3] A copy of the Statement of Organization of Illinois Victory '96 and a copy of the Report of Receipts and Disbursements are attached hereto as Exhibits 2 and 3, respectively. Thus, contrary to the suggestions set forth in the Complaint, Illinois Victory '96 complied with the regulations governing the Fundraiser and has fully accounted for all receipts and disbursements of the proceeds resulting from that Fundraiser to the Commission.

In addition, the Complaint suggests that federal Commission regulations were violated because the filing of the Report of Receipts and Disbursements by Illinois Victory '96 ("Report") was untimely. This allegation is based on erroneous assumptions concerning the

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[1]The Joint Fund-Raising Agreement and related documents refer to the joint fundraising representative as "Illinois Senate - Victory '96". This is a misnomer.

[2]Section 102.17(a)(1)(i) provides in relevant part, as follows: "The Fundraising representative shall be a reporting political committee and an authorized committee of each candidate federal office participating in the joint fundraising activity."

[3]Section 102.17(b)(1) provides in relevant part, as follows: "This separate committee shall be a reporting political committee and shall collect contributions, pay fundraising costs from gross proceeds and from funds advanced by participants, and disburse net proceeds to each participant."

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proper reporting period, and is thus, unfounded. In fact, the Report of Receipts and Disbursements filed by Illinois Victory '96 was timely filed within the thirty day post general election report period,[4] which is the applicable reporting period. Further, this Report was also properly filed as the "Termination Report" for Illinois Victory '96.[5] (See Section 102.3 and 116.1 and 116.2). Specifically, Illinois Victory '96 filed the Report of Receipts and Disbursements as a Termination Report ("Report") on November 4, 1996 for activity covering the time period of October 22, 1996 through November 3, 1996, which was the only period of activity for Illinois Victory '96. In that Report, Illinois Victory '96 accounted for all proceeds generated from the Fundraiser and all disbursements therefrom. Indeed, there is no allegation in the Complaint that any of the contributions generated from the Fundraiser were in any way improper or prohibited contributions. Nor is there any allegation in the Complaint that any of the disbursements from Illinois Victory '96 from the proceeds of the Fundraiser were in any way improper or prohibited by federal election law.

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[4]Section 104.5(c)(iii) provides in relevant part, as follows: "(iii) Post-General Election Reports: (A) A post-general election report shall be filed no later than 30 days after any general election; (B) The report shall be complete as of the 20th day after the general election."

[5]Section 102.3 provides in relevant part, as follows: "A political committee (other than a principal campaign committee) may terminate only upon filing a termination report on the appropriate FEC Form or upon filing a written statement containing the same information as the place of filing . . . ; see also, Section 116.1, which provides in relevant part, as follows: "A political committee will be considered to be winding down its political activities if it has ceased to make or accept contributions and expenditures, other than contributions accepted for debt retirement purposes and expenditures representing payments of debts or obligations previously incurred or payments for the costs associated with the termination of political activity, such as the costs of complying with the post election requirements of the Act, if applicable, and other necessary administrative costs associated with winding down a campaign or winding down committee activities, including office space rental, staff salaries and office supplies."

Thus, contrary to the suggestion in the Complaint, Illinois Victory '96 timely filed the Report at the duly authorized and registered joint fundraising representative for the Respondents. As a result, the Commission should take no further action and no further investigation is warranted based on any of the allegations in the Complaint.

The Complaint also suggests that Illinois Victory '96 was required under the law to file a "48 hour notice". The Complaint is erroneous as a matter of law and the suggestion should, therefore, be rejected outright. 11 CFR Section 104.5(f) controls and provides as follows:

> If any contribution of $1,000 or more is received by any authorized committee of a candidate after the twentieth day, but more than forty-eight hours, before 12:01 a.m. of the day of the election, the principal campaign committee of that candidate shall notify the Commission, the Secretary of the Senate and the Secretary of State, as appropriate, within forty eight hours of receipt of the contribution. The notification shall be in writing and shall include the name of the candidate and office sought by the candidate, the identification of the contributor, and the date of receipt and the amount of contribution. The notification shall be in addition to the reporting of these contributions on the post election report.

11 CFR Section 104.5(f). In other words, according to Section 104.5(f), if any authorized committee of a candidate receives a contribution of $1,000 or more from October 15, 1996 through November 3, 1996, the principal campaign committee of that candidate must so notify the Commission within 48 hours of receipt of that contribution. Here, contrary to the allegation in the Complaint, Illinois Victory '96 was not required to file 48 notices because it was not a principal campaign committee.

Based on the foregoing, the Commission should take no further action with respect to the Complaint, as no further investigation is necessary or warranted.

B. The Respondents Substantially Complied With Commission Regulations Regarding the Amendment of the Respective Statements of Organization.

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The Complaint also suggests that the Commission should utilize its limited resources to conduct an investigation as to why certain Statements of Organization were not amended to designate Illinois Victory '96 as the joint fundraising representative for the Fundraiser. The Commission should reject this suggestion as it is unfounded in fact and in law.

The record establishes that the Respondents substantially complied with Commission regulations and prepared appropriate Statements of Organization reflecting Illinois Victory '96 as the joint fundraising committee. Contrary to the allegations in the Complaint, Senator Durbin's principal campaign committee, the Friends of Dick Durbin, filed an amended Statement of Organization on October 28, 1996 which identified Illinois Victory '96 as the Joint Fundraising Committee, a copy of which is attached as Exhibit 4. Thus, contrary to the allegations set forth in the Complaint, the Friends of Dick Durbin appropriately disclosed Illinois Victory '96 as the joint fundraising representative. It is notable that this filing was made well prior to the filing of the Complaint, but was completely ignored by the Complainant. Also, the Statement of Organization for Illinois Victory '96 identifies the Friends of Dick Durbin and the Democratic Party of Illinois as its affiliated committees. See Exhibit 2. Moreover, the Democratic Party of Illinois' Statement of Organization disclosed Illinois Victory '96 as an affiliated committee. See Exhibit 5 attached hereto. As a consequence, the Commission should take no further action with respect to the allegations contained in the Complaint as no further investigation is necessary and warranted.

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Conclusion

As made clear in this Response, the Complaint should be stricken because it fails to comply with the minimal pleading requirements of federal election law and, as a practical matter,

the Complaint is factually incoherent. As a result, the Respondents have been unfairly prejudiced in attempting to disprove allegations which are not founded on the personal knowledge of the Complainant, and the Complainant has failed and refused to identify the source of the information upon which the Complaint is based. The limited resources of the Commission should not be devoted to a situation where, as here, the Respondents have substantially complied with all applicable federal election rules and regulations and there is absolutely no allegations whatever of any improper contributions or disbursements.

WHEREFORE, the Respondents respectfully request that the Commission take no further action on the Complaint and deem this Matter Under Review closed.

Respectfully submitted,

UNITED DEMOCRATS OF ILLINOIS, FRIENDS OF DICK DURBIN, SENATOR DICK DURBIN, the DEMOCRATIC PARTY OF ILLINOIS, JOHN GIANULES, MICHAEL DALY, MICHAEL TRAMANTINO

By William R. Quinlan, one of their attorneys

William R. Quinlan
John F. Kennedy
Quinlan & Crisham, Ltd.
161 North Clark Street, Suite 2300
Chicago, Illinois 60601
312.263.0900

Michael Dorf
Adducci Dorf Lehner Mitchell & Blankenship
150 N. Michigan Avenue, Suite 2130
Chicago, Illinois 60601
312.781.2806

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JOINT FUNDRAISING AGREEMENT

This Agreement entered into this 7th day of October, 1996 by and between United Democrats of Illinois ("UDI") and Friends of Dick Durbin (hereinafter collectively referred to as the "Committees").

WITNESSETH

WHEREAS the Committees are political committees registered pursuant to the Federal Election Campaign Act of 1971, as amended (the "FECA"), and

WHEREAS the UDI is a registered political committee subject to the laws of the State of Illinois; and

WHEREAS the Committees desire to conduct joint fundraising events in compliance with the FECA and the laws of the State of Illinois;

Now, therefore, in consideration of the mutual covenants herein contained, the Committees agree as follows:

1. **Purpose of Joint Fundraising**

The purpose of the joint fundraising activity is to receive contributions to fund the Committee's support of candidates seeking election to office in the November, 1996 General Election

2. **Participants**

UDI and Friends of Dick Durbin are "political committees" within the meaning of the FECA, and in the case of the UDI, as defined by the State of Illinois.

3. **Fundraising Representative**

The committees will establish and register with the FEC a separate political committee, "Illinois Senate - Victory '96", to act as a fundraising representative. The Committees will

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Ex. 1

amend their Statements of Organization, as necessary, to reflect this committee as an affiliated/authorized committee.

1. Allocation Formula

The Committees agree that the allocation formula set forth in the Exhibit A to this Agreement (the "Allocation Formula") will be used to allocate the funds raised in connection with this joint fundraising activity.

5. Exceptions to Allocation Formula

Under the following circumstances, the Allocation Formula as set forth in Exhibit A will not be used:

a. When a contributor designates his or her contribution to the Committees according to a different allocation formula;

b. When a contributor designates his or her contribution to a single committee;

c. When a contribution allocated according to the Allocation Formula would cause a contributor to exceed applicable contribution limits to any of the Committees.

6. Depository

Illinois Senate - Victory '96 will establish a separate depository account to be used solely for the receipt and disbursement of funds raised by the joint fundraiser. The Committees will amend their Statements of Organization, as necessary, to reflect this account.

7. Receipts and Disbursements

a. All contributions and other donations received by Illinois Senate - Victory '96 will be placed in the appropriate depository account within 10 days as required by 11 C.F.R. Sections 103.3. All disbursements for expenses will be made from this account INCLUDING REIMBURSEMENT TO UDI FOR EXPENSES REQUIRED TO BE PAID BEFORE ALL RECEIPTS ARE COLLECTED AND DEPOSITED.

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b. Each contribution comprising the gross proceeds of the fundraising activity will be allocated between the Committees according to the Allocation Formula. However, if such allocation results in a violation of the contribution limits under the FECA, Illinois Senate - Victory '96 will reallocate the contribution.

c. Expenses will be allocated among the Committees according to the Allocation Formula. However, if a reallocation of contributions is required that results in a change in the Allocation Formula, expenses will be similarly reallocated as well.

8. **Distribution of Proceeds**

After expenses from each event have been paid from the gross proceeds, Illinois Senate - Victory '96 will transfer the net proceeds from the event to the Committees according to the final Allocation Formula, as modified by any reallocation required. Illinois Senate - Victory '96 will arrive at the net proceeds figure by subtracting each committee's share of the event allocated to each. Nothing in this Paragraph 8 shall preclude the transfer of any portion of the net proceeds to the Committees before all expenses have been paid.

9. **Accounting to the Committees**

The treasurer of Illinois Senate - Victory '96 shall provide to each party to this Agreement periodic accounting for each event which shall contain the following information:

a. a list of all contributions to Illinois Senate - Victory '96 which includes the name, address, occupation, and employer of each contributor, the amount of the contribution, and the date of receipt of the contribution;

b. a list of all disbursements, to whom, the purpose, and the amount;

c. a list of any outstanding debts of Illinois Senate - Victory '96; and

d. The current funds balance.

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10. Reporting

a. Illinois Senate - Victory '96 will report all funds received and all disbursements made during each reporting period according to the requirements of the FECA, FEC regulations and campaign disclosure laws of the State of Illinois. All reporting schedules used to report the activity of Illinois Senate - Victory '96 will be clearly marked as joint fundraising activity.

b. The Committees will report receipt of the proceeds in accordance with the timely requirements of the FECA, FEC regulations and the laws of the State of Illinois.

11. Record keeping

a. Illinois Senate - Victory '96 and the Committees shall screen all contributions received to insure compliance with 11 C.F.R Section 110 and Section 114. The Committees shall make their contributor records available to Illinois Senate - Victory '96 to perform such screening function.

b. Illinois Senate - Victory '96 shall collect and retain contributor employer and occupation information with regard to gross proceeds as required by 11 C.F.R. Section 102.8 and shall forward such information to the Committees.

c. Illinois Senate - Victory '96, or its designated agent, will maintain a copy of the Agreement and the records required under 11 C.F.R. Section 102.9 regarding fundraising disbursement for three (3) years from the date of execution or disbursement as the case may be. The Agreement shall be made available to the FEC or the Illinois Secretary of State on request.

12. Miscellaneous

a. All solicitations of contribution in connection with each event will be conducted in accordance with the notice provision of 11 C.F.R. Sections 102.17(c) (2).

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b. Any changes to the provisions of this Agreement must be made in writing and signed by all parties to the Agreement.

c. The Agreement may be executed in two or more counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument.

AS AMENDED & SUBJECT TO APPROVAL BY COUNSEL

UNITED DEMOCRATS OF ILLINOIS

Mike Tramontana

Title: State Director

FRIENDS OF DICK DURBIN

Michael Edd Doty

Title: Campaign Manager

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JOINT FUNDRAISING AGREEMENT
FIRST LADY EVENT 10/14/1996

2.5m / 10m

EXHIBIT A

Allocation Formula for Funds

The Allocation for funds raised under this Agreement shall be as follows:

All contributions not made for federal election purposes shall be allocated 100% to United Democrats of Illinois - Non Federal Account.

- The first $1,000 of each contribution from an individual will be allocated to Friends of Dick Durbin and designated for the General Election.

- The balance of each contribution from an individual in excess of $1,000 up to a maximum of $6,000 shall be allocated to United Democrats of Illinois - Federal Account and designated for the General Election.

Contributions from Political Action Committees registered with the Federal Election Commission shall be allocated as follows:

To Friends of Dick Durbin:	50%
To UDI:	50%

DPD. → 50% to UDol.

The Committees agree that the first $60,000 shall be intended for the UDI as federal limits permit, and the balance of all funds raised in excess of this amount shall be intended for Friends of Dick Durbin, not withstanding federal limits.

Any portion of any contribution in excess of these amounts or that would cause a contributer to exceed applicable contribution limits to Friends of Dick Durbin will be allocated to UDI.

Nothing in this Formula is intended to prohibit a contributor from designating a contribution to either Committee.

OVER AND ABOVE THE FIRST $60,000, ANY FUNDS CONTRIBUTED SOLELY THROUGH THE EFFORTS OF THE DPI, UP TO THE FIRST $32,000, ARE TO BE CREDITED TO THE UDI.

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STATEMENT OF ORGANIZATION

(See reverse side for instructions)

1. Name of Committee (in full)
ILLINOIS VICTORY '96

Address (number and street)
54 W. ILLINOIS SUITE 200

City, State and ZIP Code
CHICAGO IL 60610

2. Date of Organization (mo., day, yr.)
Nov 4 96

3. Type of Committee (Check one)

☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)

☒ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	Residence
DICK DURBIN	DEMOCRATIC	U.S. SENATE	IL

☐ (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(Name of candidate)

☐ (d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)

☐ (e) This committee is a separate segregated fund.

☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

4. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
FRIENDS OF DICK DURBIN	P.O. BOX 1879 SPRINGFIELD IL 62705	JOINT FUNDRAISING REPRESENTATIVE
DEMOCRATIC PARTY OF ILLINOIS	420 MICHIGAN AVE CHICAGO IL 60657	JOINT FUNDRAISING COMMITTEE

Type of Connected Organization

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

5. Custodian of Records (Identify by name, address (phone number - optional) and position of the person in possession of committee books and records.

Full Name	Mailing Address	Title or Position
MICHAEL TRAMONTINA	54 W ILLINOIS, SUITE 200 CHICAGO IL 60610	TREASURER

6. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position
MICHAEL TRAMONTINA	54 W ILLINOIS SUITE 200 CHICAGO IL 60610	TREASURER

8. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
LASALLE BANK	ONE W MONROE CHICAGO IL 60603

I certify that I have examined this Statement of Organization and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer	Signature of Treasurer	Date
MICHAEL TRAMONTINA	Michael L Tramontina	11-9-96

NOTE: Submission of false, erroneous, or incomplete information may subject you to penalties arising out of Section 2 U.S.C. 437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

FOR FURTHER INFORMATION WRITE:
Federal Election Commission
Toll-free 800-424-9530
Local 202-219-3420

FEC FORM 1
(Revised 6/96)

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Ex. 2

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1 NAME OF COMMITTEE (in full)

ILLINOIS VICTORY '96

ADDRESS (number and street) Check if different than previously reported

54 W ILLINOIS, SUITE 200

CITY STATE and ZIP CODE

CHICAGO IL 60610

2 FEC IDENTIFICATION NUMBER

3 This committee qualified as a multicandidate committee **DURING THIS** Reporting Period on _____ (date)

4. TYPE OF REPORT

(a)
- April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- X Termination Report

Monthly Report Due On

February 20	June 20	October 20
March 20	July 20	November 20
April 20	August 20	December 20
May 20	September 20	January 31

__ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

__ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? __ YES X NO

SUMMARY

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period 10-28-96 through 11-3-96		
6	(a) Cash on Hand January 1, 19 96		$ 0.00
	(b) Cash on Hand at Beginning of Reporting Period	$ 0.00	
	(c) Total Receipts (from Line 19)	$ 46,050.00	$ 46,050.00
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 46,050.00	$ 46,050.00
7	Total Disbursements (from Line 30)	$ 46,050.00	$ 46,050.00
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 0.00	$ 0.00
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$ 0.00	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$ 0.00	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete

Type or Print Name of Treasurer

MICHAEL DEANGELINA

Signature of Treasurer

Michael J. DeAngelina

Date

11/3/96

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g

FEC FORM 3X

EX 3

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DETAILED SUMMARY PA[illegible]
OF RECEIPTS AND DISBURSEMENTS
PAGE 2, FEC FORM 3X

(revised 1 1 91)

NAME OF COMMITTEE: [illegible] '96

REPORT COVERING PERIOD FROM 1 23 96 TO 11 2 96

		COLUMN A Total This Period	COLUMN B Calendar Year
	I. Receipts		
11	Contributions (other than loans) From:		
	a Individual/Persons Other Than Political Committees		
	i Itemized (use Schedule A)	36,250.00	36,250.00
	ii Unitemized	9,300.00	9,300.00
	iii Total (add i and ii) ➤	45,550.00	45,550.00
	b Political Party Committees	0.00	0.00
	c Other Political Committees (such as PACs)	500.00	500.00
	d Total Contributions (add a iii, b and c) ➤	46,050.00	46,050.00
12	Transfers From Affiliated/Other Party Committees	0.00	0.00
13	All Loans Received	0.00	0.00
14	Loan Repayments Received	0.00	0.00
15	Offsets To Operating Expenditures (Refunds, Rebates, etc.)	0.00	0.00
16	Refunds of Contributions Made to Federal Candidates and Other Political Committees	0.00	0.00
17	Other Federal Receipts (Dividends, Interest, etc.)	0.00	0.00
18	Transfers from Nonfederal Account for Joint Activity	0.00	0.00
19	Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18) ➤	46,050.00	46,050.00
20	Total Federal Receipts (subtract line 18 from line 19) ➤	46,050.00	46,050.00
	II. Disbursements		
21	Operating Expenditures		
	a Shared Federal/Non-Federal Activity (from Schedule H4)		
	i Federal Share	0.00	0.00
	ii Non-Federal Share	0.00	0.00
	b Other Federal Operating Expenditures	2500.00	2500.00
	c Total Operating Expenditures (Add a i, a ii, and b) ➤	2500.00	2500.00
22	Transfers to Affiliated/Other Party Committees	43050.00	43050.00
23	Contributions to Federal Candidates/Committees and Other Political Committees	0.00	0.00
24	Independent Expenditures (use Schedule E)	0.00	0.00
25	Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F)	0.00	0.00
26	Loan Repayments Made	0.00	0.00
27	Loans Made	0.00	0.00
28	Refunds of Contributions To:		
	a Individuals/Persons Other Than Political Committees	0.00	0.00
	b Political Party Committees	0.00	0.00
	c Other Political Committees (such as PACs)	200.00	200.00
	d Total Contribution Refunds (Add a, b and c) ➤	200.00	200.00
29	Other Disbursements	0.00	0.00
30	Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) ➤	46,050.00	46,050.00
31	Total Federal Disbursements (subtract line 21 a ii from line 30) ➤		
	III. Net Contributions/Operating Expenditures		
32	Total Contributions (other than loans) (from line 11d)	46,050.00	46,050.00
33	Total Contribution Refunds (from line 28d)	200.00	200.00
34	Net Contributions (other than loans) (subtract line 33 from 32)	45,850.00	45,850.00
35	Total Federal Operating Expenditures (add 21 a i and 21 b) ➤	2500.00	2500.00
36	Offsets to Operating Expenditures (from line 15)	0.00	0.00
37	Net Operating Expenditures (subtract line 36 from 35) ➤	2500.00	2500.00

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SCHEDULE A — ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 3

FOR LINE NUMBER 11 a

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)

ILLINOIS VICTORY '96

A. Full Name, Mailing Address and ZIP Code ARAIN, MOHAMMED 506 SAUK PATH OAK BROOK, IL 60521 Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Name of Employer INFORMATION REQUESTED Occupation Aggregate Year-to-Date > $ 1000	Date (month, day, year) 10-31-96	Amount of Each Receipt this Period 1000.00
B. Full Name, Mailing Address and ZIP Code DAVIS, ALLISON 14 W ERIE Chicago IL 60610 Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Name of Employer THE DAVIS GROUP Occupation REAL ESTATE DEVELOPER Aggregate Year-to-Date > $ 2500	Date (month, day, year) 10-28-96	Amount of Each Receipt this Period 2500.00
C. Full Name, Mailing Address and ZIP Code DEMETRIO, MARY 335 WHITE OAK LANE WINNETKA, IL 60093 Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Name of Employer INFORMATION REQUESTED Occupation Aggregate Year-to-Date > $ 2500.00	Date (month, day, year) 10-23-96	Amount of Each Receipt this Period 2500.00
D. Full Name, Mailing Address and ZIP Code DRUCKER, ROBERT 1050 MEADOWLARK LANE GLENVIEW, IL 60025 Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Name of Employer INFORMATION REQUESTED Occupation Aggregate Year-to-Date > $ 5000.00	Date (month, day, year) 10-11-96	Amount of Each Receipt this Period 5000.00
E. Full Name, Mailing Address and ZIP Code DRUCKER, ROSEANN 1050 MEADOWLARK LANE GLENVIEW IL 60035 Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Name of Employer INFORMATION REQUESTED Occupation Aggregate Year-to-Date > $ 2500.00	Date (month, day, year) 10-22-96	Amount of Each Receipt this Period 2500.00
F. Full Name, Mailing Address and ZIP Code EWELL, RAYMOND 7402 S. PERRY AVE CHICAGO, IL 60620 Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Name of Employer Occupation ATTORNEY Aggregate Year-to-Date > $ 500.00	Date (month, day, year) 10-23-96	Amount of Each Receipt this Period 500.00
G. Full Name, Mailing Address and ZIP Code FEINERMAN, GARY 1953 N. CLEVELAND ST CHICAGO IL 60614 Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Name of Employer ATTORNEY - MAYER BROWN & PLATT Occupation ATTORNEY Aggregate Year-to-Date > $ 500.00	Date (month, day, year) 10-30-96	Amount of Each Receipt this Period 500.00

SUBTOTAL of Receipts This Page (optional) ..... > 14,500.00

TOTAL This Period (last page this line number only) ..... >

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SCHEDULE A — ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 2 OF 3

FOR LINE NUMBER 11A

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NAME OF COMMITTEE (In Full)

ILLINOIS VICTORY '96

	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
A. Full Name, Mailing Address and ZIP Code FLANAGAN, SILTON & BRENNAN 200 E. RANDOLPH, SUITE 6900 CHICAGO IL 60601 Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Occupation ATTORNEYS Aggregate Year-to-Date > $ 250.00	10/31/96	250.00
B. Full Name, Mailing Address and ZIP Code HEYTOW, EUGENE C/O AMALGAMATED BANK ONE W. MONROE CHICAGO, IL Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Name of Employer AMALGAMATED BANK Occupation PRESIDENT Aggregate Year-to-Date > $ 1000.00	Date (month, day, year) 10/22/96	Amount of Each Receipt this Period 1000.00
C. Full Name, Mailing Address and ZIP Code HIGGENBOTTOM, ELZIE 1927 N. BURLING CHICAGO IL 60614 Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Name of Employer INFORMATION RESOURCES Occupation Aggregate Year-to-Date > $ 250.00	Date (month, day, year) 10/22/96	Amount of Each Receipt this Period 250.00
D. Full Name, Mailing Address and ZIP Code JORDAN, MICHELLE 7750 S. HOYNE CHICAGO IL 60620 Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Name of Employer ATTORNEY - E.P.A. Occupation ATTORNEY Aggregate Year-to-Date > $ 1000.00	Date (month, day, year) 10/22/96	Amount of Each Receipt this Period 1000.00
E. Full Name, Mailing Address and ZIP Code KAPLAN, SAM 111 W. WASHINGTON CHICAGO IL 60602 Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Name of Employer Occupation Aggregate Year-to-Date > $ 250.00	Date (month, day, year) 10.25.96	Amount of Each Receipt this Period 250.00
F. Full Name, Mailing Address and ZIP Code KAISER, CLINTON 153 E. ELMWOOD WILMETTE IL 60091 Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Name of Employer KAISER & ASSOC Occupation ATTORNEY Aggregate Year-to-Date > $ 500.00	Date (month, day, year) 10/25/96	Amount of Each Receipt this Period 500.00
G. Full Name, Mailing Address and ZIP Code MAHLY, DANIEL 953 N. ELSTON CHICAGO IL 60622 Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Name of Employer SELF Occupation ATTORNEY Aggregate Year-to-Date > $ 1250.00	Date (month, day, year) 10/31/96	Amount of Each Receipt this Period 1250.00

SUBTOTAL of Receipts This Page (optional)	11,250.00
TOTAL This Period (last page this line number only)	

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SCHEDULE A — ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 3 OF 3

FOR LINE NUMBER 11A

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NAME OF COMMITTEE (In Full)

ILLINOIS VICTORY '96

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
MALKIN JEANNE 150 E PEARSON CHICAGO IL 60611	INFORMATION REQUESTED	10.31.96	1250.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Occupation	Aggregate Year-to-Date > $	1250.00

B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
O'KEEFFE, ASHENDEN LYONS & GALO 30 N. LASALLE ST. #400 CHICAGO IL 60602	SAME	10.31.96	2500.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Occupation: ATTORNEYS	Aggregate Year-to-Date > $	2500.00

C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
REZKO, ANTOIN INFORMATION REQUESTED	INFORMATION REQUESTED	10.31.96	1250.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify): JOINT FUNDRAISING	Occupation	Aggregate Year-to-Date > $	1250.00

D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
STERN, CAROL 605 WASHINGTON AVE GLENCOE, IL 60022	INFORMATION REQUESTED	10.25.96	2500.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Occupation	Aggregate Year-to-Date > $	2500.00

E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
STONE, Jeffrey 351 Greenbay Road Highland Park IL 60035	INFORMATION REQUESTED	10.29.96	250.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Occupation	Aggregate Year-to-Date > $	250.00

F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
TANNEBAUM, JUNE 132 E DELAWARE CHICAGO IL 60611	INFORMATION REQUESTED	10.31.96	1250.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Occupation	Aggregate Year-to-Date > $	1250.00

G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
WOLF, William INFORMATION REQUESTED	INFORMATION REQUESTED	10.31.96	1500.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify): JOINT FUNDRAISING	Occupation	Aggregate Year-to-Date > $	1500.00

SUBTOTAL of Receipts This Page (optional)	10,900.00
TOTAL This Period (last page this line number only)	36,250.00

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SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 11C

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)

ILLINOIS VICTORY '96

A. Full Name, Mailing Address and ZIP Code VIVRA PAC 400 Primrose S-ne 200 Burlingame CA 94010 Receipt For: ☐ Primary ☒ General ☐ Other (specify): JOINT FUNDRAISING	Name of Employer Occupation Aggregate Year-to-Date > $ 500.00	Date (month, day, year) 10-25-96	Amount of Each Receipt this Period 500.00
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)	500.00
TOTAL This Period (last page this line number only)	500.00

93043362373

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

1. (a) NAME OF COMMITTEE IN FULL	☐ (Check if name is changed)	2. DATE
Friends of Dick Durbin Committee		10/28/96
(b) Number and Street Address	☐ (Check if address is changed)	3. FEC Identification Number
P.O. Box 1969		C00168999
(c) City, State and ZIP Code		4. Is This Report An Amendment?
Springfield, IL 62705		☒ YES ☐ NO

5. TYPE OF COMMITTEE (Check one)

☒ (a) This committee is a principal campaign committee. (Complete the candidate information below.)

☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District
Richard J. Durbin	Democratic	U.S. Senate	IL

☐ (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)

☐ (d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)

☐ (e) This committee is a separate segregated fund.

☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
Illinois Senate Victory Fund	630 S. Capitol Washington,DC20003	Joint fundraising comm
Fast Break	P.O.Box 1656 Sioux Falls,SD 57101	Joint fundraising comm
Illinois Victory 96	54 W. Illinois,Suite 200 Chgo,IL 60610	Joint fundraising comm

Type of Connected Organization Party committee DSCC Joint fundraising committees
☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number – optional) and position of the person in possession of committee books and records.

Full Name	Mailing Address	Title or Position
Anne M. Dougherty	1408 Dial Ct. Spfld. IL 62704	Assistant Treasurer

8. Treasurer: List the name and address (phone number – optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position
Michael E. Daly	3116 Rutgers Spfld. IL 62704	Treasurer

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Illinois Senate Victory Fund Depository Nations Bank	730 15th St. NW Washington, DC 20005
Fast Break - Bank of South Dakota	5501 W. 41st St. Sioux Falls, SD 57106

see attached sheets for additional banks

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

TYPE OR PRINT NAME OF TREASURER	SIGNATURE OF TREASURER	DATE
Michael E. Daly	Michael E. Daly	10/28/96

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.
ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

For further information contact:
Federal Election Commission
Toll-free [redacted]

FEBANOES

FEC FORM 1
(revised 4/87)

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Ex. 4

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

1 NAME OF COMMITTEE (Check if name is changed)

DEMOCRATIC PARTY OF ILLINOIS

2 DATE

12.05.96

3a Number and Street Address (Check if address is changed)

489 Merchandise Mart

3 FEC IDENTIFICATION NUMBER

C00167015

3b City, State and ZIP Code

Chicago, IL 60654

4 IS THIS STATEMENT AN AMENDMENT?

X YES ___ NO

5 TYPE OF COMMITTEE (Check one)

___ (a) This committee is a principal campaign committee. (Complete the candidate information below.)

___ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District

___ (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)

___ (d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)

___ (e) This committee is a separate segregated fund.

___ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

6 Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
ILLINOIS VICTORY '96	489 MERCHANDISE MART CHICAGO IL 60654	JOINT FUNDRAISING REPRESENTATIVE
FRIENDS OF DICK DURBIN	311 W ILLINOIS CHICAGO IL 60610	JOINT FUNDRAISING PARTICIPANT

Type of Connected Organization

___ Corporation ___ Corporation w/o Capital Stock ___ Labor Organization ___ Membership Organization ___ Trade Association ___ Cooperative

7 Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name	Mailing Address	Title or Position

8 Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee, and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position

9 Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
CHICAGO BANC (ILLINOIS VICTORY '96)	ONE WEST MONROE CHICAGO IL 60603

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

TYPE OR PRINT NAME OF TREASURER	SIGNATURE OF TREASURER	DATE
JOHN A GRAMIGNA	John A Gramigna	12 05 96

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. 437g.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS

For further information contact:
Federal Election Commission
Toll-free 800-424-9530
Local 202-376-3120

FEC FORM 1
(revised 4 87)

EX. 5

930433862383C

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 14, 1997

Michael Tramontina, Treasurer
Illinois Victory '96
54 W. Illinois, Suite 200
Chicago, IL 60610

RE: MUR 4572

Dear Mr. Tramontina:

You requested, on your Termination Report covering the period of October 22, 1996, through November 3, 1996, that the Federal Election Commission permit Illinois Victory '96 ("Committee") to terminate pursuant to 2 U.S.C. § 433(d) and Section 102.3 of the Commission's Regulations. Because of the ongoing enforcement matter involving your Committee, this request has been denied. Therefore, you are reminded that the Committee must continue to file all the required reports with the Commission until such time as the enforcement matter has been closed as to the Committee.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

cc: Reports Analysis Division

2304383623381

Durbin

JUN 2[illegible] 1:47 PM '97

June 15, 1997

F. Andrew Turley
Supervisory Attorney
Federal Election Commission
Washington, DC 20463

Dear Mr. Turley

MUR 4571

I am the Treasurer of the Friends of Dick Durbin Committee. I directed the Senator's campaign in 1996.

During this time, neither Senator Durbin nor his campaign had prior knowledge or prior contact with the National Council of Senior Citizens regarding their endorsement. We did coordinate with them on the endorsement annoucement, as we did with virtually every other organization which endorsed Senator Durbin.

If you have any further questions, please feel free to contact me.

Sincerely,

Michael E. Daly
Treasurer
Friends of Dick Durbin Committee

23043363232

Paid for by
Friends of Dick Durbin
P. O. Box 1949 • Springfield, IL 62705

FEDERAL ELECTION COMMISSION
Washington, DC 20463

August 14, 1997

John F. Kennedy, Esquire
Quinlan & Crisham, LTD.
161 North Clark Street, Suite 2300
Chicago, IL 60601

re: MUR 4572

Dear Mr. Kennedy:

The above-captioned Matter Under Review (MUR) is still pending in our office. You represent several respondents in this matter, including Illinois Victory '96, for whom you submitted a response to the complaint on or about January 31, 1997.

A recent review of the file revealed a minor technical irregularity regarding Illinois Victory '96. This file does not contain a record of the original complaint letter sent to your client, Illinois Victory '96. Though we assume from your formal response and representations that this organization received a copy of the complaint, we wanted to bring this fact to your attention to ensure that your client receives the full measure of administrative due process afforded to it under the Federal Election Campaign Act.

A copy of the complaint is enclosed. While we understood and accepted your January 31st submission as a response to the complaint on behalf of Illinois Victory '96, among others, we are pleased to provide you with an additional fifteen days from the date you receive this letter to forward any further response to the complaint you may wish to file on behalf of Illinois Victory '96. The focus of this response, as with the original, should be to demonstrate in writing that no action should be taken against Illinois Victory '96 and its treasurer based upon this complaint. Your further response may include any additional factual or legal submissions which may be relevant to the Commission's analysis of this matter.

This matter will continue to remain confidential in accordance with 2 U.S.C. § 473g(a)(4)(B), unless you notify the Commission in writing that your client wishes the matter to be made public.

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Please accept my apologies for any misunderstanding or confusion this unusual situation may have caused. If we can be of any further assistance, please do not hesitate to call me or Ms. Alva Smith at (202) 219-3690.

Very truly yours,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosure
1. Complaint

9804336213

QUINLAN & CRISHAM, LTD.

WILLIAM R. QUINLAN
THOMAS M. CRISHAM
MARY PATRICIA BOYLE
MICHAEL C. BRUCK
JAMES R. CARROLL

THOMAS C. ROWDALES
JOHN F. KENNEDY
JEFFREY T. KUBIK
MICHAEL I. ROTHSTEIN
CAESAR A. TARKI

ATTORNEYS AT LAW

WRITER'S DIRECT DIAL

(312) 917-8475

DAVID M. JENKINS
MICHAEL W. KIRK
KELLY A. O'CONNOR
JOHN P. O'MALLEY
ISABEL L. STANNER
CATHERINE J. CASEY
MARK L. DUBLIN

JAMES A. NEWMARA
SCOTT L. REALM
J. JEFFREY PRATHER
JENNIFER R. BUCHER
JENNIFER R. DARE
LAWRENCE J. MORRISSEY
LISA M. HEGEDUS

September 5, 1997

SEP 8 11 12 AM '97

Via Facsimile
Mr. F. Andrew Turley, Supervisory Attorney
Central Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

Re: **MUR 4572**

Dear Mr. Turley:

It was a pleasure to speak to you today. This will confirm our discussion in which you have permitted us a week's extension of time until September 12, 1997 to respond to your recent correspondence relating to Illinois Victory 96's response to the matter under review. We appreciate your courtesy in this regard.

Very truly yours,

John P. O'Malley

JPO:dj

9804338623385

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 8, 1997

John P. O'Malley, Esquire
QUINLAN & CRISHAM, Ltd
161 North Clark Street
Chicago, IL 60601

RE: MUR 4572

Dear Mr. O'Malley:

This is in response to your letter dated September 5, 1997, confirming your telephone conversation with F. Andrew Turley regarding an extension until September 12, 1997, to respond to the complaint filed in the above-noted matter. Although your request is made after the due date of your response, after considering the circumstances, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on September 12, 1997.

If you have any questions, please contact me on our toll-free telephone number, (800) 424-9530. Our local telephone number is (202) 219-3400.

Sincerely,

Alva E. Smith, Paralegal
Central Enforcement Docket

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QUINLAN & CRISHAM, LTD.

WILLIAM R. QUINLAN
THOMAS M. CRISHAM
MARY PATRICIA BYRT
MICHAEL C. REVIS
JAMES R. CARROLL

THOMAS C. ROTHHAUSER
JOHN F. KENNEDY
JEFFREY T. KUBIK
MICHAEL I. ROTHSTEIN
CARMAR A. TAPET

ATTORNEYS AT LAW

WRITER'S DIRECT DIAL
(312) 917-8475

DAVID M. JENKINS
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JOHN P. O'MALLEY
DANIEL L. STANNER
CATHERINE J. CASEY
MARK L. TUREEN

JAMES A. NEWMARK
SCOTT L. BRALM
J. JEFFREY PATTON
JENNIFER E. BURNS
JENNIFER K. DART
LAWRENCE J. MOSKOWITZ
LISA M. [illegible]

September 12, 1997

VIA FACSIMILE

Mr. F. Andrew Turley, Supervisory Attorney
Central Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

SEP 12 3 08 PM '97

Re: MUR 4572

Dear Mr. Turley:

This is in response to your August 14, 1997 letter. In that letter you advised that your review of the file indicated a minor technical irregularity regarding Illinois Victory '96 in that your file does not contain a record of the Federal Election Commission ("FEC") serving a copy of the original complaint letter on Illinois Victory '96. Because of this irregularity, you have allowed Illinois Victory the opportunity to respond to the complaint. On September 5, 1997, you courteously allowed us until September 12, 1997 in which to provide additional response, if any.

On behalf of Illinois Victory '96, this is to advise you that Illinois Victory '96 submits to the jurisdiction of the FEC and the response filed on or about January 31, 1997 stands as the response of Illinois Victory '96. Illinois Victory '96, however, reserves its rights to supplement its response in the future, should the need arise.

I trust that this satisfies your inquiry. Should you have any questions, please call me.

Very truly yours,

John F. Kennedy

JFK/dmp
cc: William R. Quinlan

161 NORTH CLARK STREET - SUITE 2900 - CHICAGO, ILLINOIS 60601 - TELEPHONE 312.263.0900 - FACSIMILE 312.263.3013 - QUINLAN.CRISHAM@QCLAW.COM

2304338623337

AGENDA DOCUMENT NO. X98-13

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) CASE CLOSURES UNDER ENFORCEMENT PRIORITY)

GENERAL COUNSEL'S REPORT

I. INTRODUCTION.

The cases listed below have been identified as either stale or of low priority based upon evaluation under the Enforcement Priority System (EPS). This report is submitted to recommend that the Commission no longer pursue these cases.

II. CASES RECOMMENDED FOR CLOSURE.

A. Cases Not Warranting Further Action Relative to Other Cases Pending Before the Commission

EPS was created to identify pending cases which, due to the length of their pendency in inactive status or the lower priority of the issues raised in the matters relative to others presently pending before the Commission, do not warrant further expenditure of resources. Central Enforcement Docket (CED) evaluates each incoming matter using Commission-approved criteria which results in a numerical rating of each case.

Closing cases permits the Commission to focus its limited resources on more important cases presently

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pending before it. Based upon this review, we have identified 16 cases that do not warrant further action relative to other pending matters.[1] The attachment to this report contains summaries of each case, the EPS rating, and the factors leading to assignment of a low priority and recommendation not to further pursue the matter.

B. Stale Cases

Effective enforcement relies upon the timely pursuit of complaints and referrals to ensure compliance with the law. Investigations concerning activity more remote in time usually require a greater commitment of resources, primarily due to the fact that the evidence of such activity becomes more difficult to develop as it ages. Focusing investigative efforts on more recent and more significant activity also has a more positive effect on the electoral process and the regulated community. In recognition of this fact, EPS provides us with the means to identify those cases which remained unassigned for a significant period due to a lack of staff resources for effective investigation. The utility of commencing an investigation declines as these cases age, until they reach a point when activation of a case would not be an efficient use of the Commission's resources.

[1] These cases are: MUR 4631 (*Perot/McClure*), MUR 4661 (*Cox and Amplicon, Inc.*), MUR 4667 (*Specter & Greenwood*), MUR 4668 (*Schakowsky for Congress*), MUR 4672 (*Friends of John O'Toole*), MUR 4673 (*Papan for Assembly*), MUR 4676 (*Warren County Democratic Committee*), MUR 4677 (*Patrick Kennedy*), MUR 4681 (*Jack Block*), MUR 4683 (*Janice Schakowsky for Congress*), MUR 4684 (*Spartanburg County Republicans*), MUR 4694 (*Jan Schakowsky for Congress*), MUR 4695 (*Schakowsky for Congress*), MUR 4696 (*Janice Schakowsky for Congress*), MUR 4703 (*Dumont Institute / Robert McGee*), and Pre-MUR 356 (*Pritzker for Congress*).

We have identified cases which have remained on the Central Enforcement Docket for a sufficient period of time to render them stale. We recommend 27 of these cases be closed.[3] Nine of these cases were part of the so-called "Major 96" cases that have not been able to be activated due to a lack of resources to effectively pursue them in a timely fashion.[4] Since the time period rendering them stale has now passed, we recommend their closure at this time.

We recommend that the Commission exercise its prosecutorial discretion and direct closure of the cases listed below, effective February 24, 1998. Closing

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[3] These cases are: MUR 4350 (*Republican Party of Minnesota*), MUR 4355 (*Aqua-Measure Industries, Inc.*), MUR 4372 (*Nebraska Democratic Party*), MUR 4394 (*Americans for Term Limits*), MUR 4472 (*Committee to Elect Winston*), MUR 4483 (*Nebraska Democratic State Central Committee*), MUR 4504 (*NH Democratic State Party Committee*), MUR 4507 (*People for Boschwitz*), MUR 4509 (*Wellstone for Senate*), MUR 4565 (*Bell for Congress*), MUR 4570 (*Congresswomen Andrea Seastrand*), MUR 4571 (*Sybert for Congress Committee*), MUR 4572 (*Friends of Dick B. Durbin*), MUR 4575 (*Dana Covington*), MUR 4585 (*Hughes for Congress Committee*), MUR 4589 (*Congressman Bart Gordon*), MUR 4592 (*Iowa Public Television*), MUR 4593 (*Public Interest Institute*), MUR 4599 (*Bruce W. Hapenowicz*), MUR 4601 (*Chickasaw Nation of Oklahoma*), MUR 4602 (*WFSB-TV Channel 3*), MUR 4604 (*Dana Covington*), MUR 4605 (*Christian Coalition*), Pre-MUR 346 (*Coalition of Politically Active Christians*), RAD 96NF-09 (*O'Sullivan for Congress*), RAD 96L-12 (*Alaska Democratic Party*), and RAD 97NF-02 (*Zien for Congress*).

[4] These cases are: MUR 4350 (*Republican Party of Minnesota*), MUR 4372 (*Nebraska Democratic Party*), MUR 4394 (*Americans for Term Limits*), MUR 4472 (*Committee to Elect Winston*), MUR 4483 (*Nebraska Democratic State Central Committee*), MUR 4504 (*NH Democratic State Party Committee*), MUR 4507 (*People for Boschwitz*), MUR 4509 (*Wellstone for Senate*), and MUR 4565 (*Bell for Congress*).

these cases as of this date will permit CED and the Legal Review Team the necessary time to prepare closing letters and case files for the public record.

III. RECOMMENDATIONS.

A. Decline to open a MUR, close the file effective February 24, 1998, and approve the appropriate letters in the following matters:

1. RAD 96NF-09
2. RAD 96L-12
3. RAD 97NF-02
4. Pre-MUR 346
5. Pre-MUR 356

B. Take no action, close the file effective March 2, 1998, and approve the appropriate letters in the following matters:

1. MUR 4350
2. MUR 4355
3. MUR 4372
4. MUR 4394
5. MUR 4472
6. MUR 4483
7. MUR 4504
8. MUR 4507
9. MUR 4509
10. MUR 4565
11. MUR 4570
12. MUR 4571
13. MUR 4572
14. MUR 4575
15. MUR 4585
16. MUR 4589
17. MUR 4592
18. MUR 4593
19. MUR 4599
20. MUR 4601
21. MUR 4602
22. MUR 4604
23. MUR 4605
24. MUR 4631
25. MUR 4661
26. MUR 4667
27. MUR 4668
28. MUR 4672
29. MUR 4673
30. MUR 4676
31. MUR 4677
32. MUR 4681
33. MUR 4683
34. MUR 4684
35. MUR 4694
36. MUR 4695
37. MUR 4696
38. MUR 4703

Date

Lawrence M. Noble
General Counsel

9804538623021

FEDERAL ELECTION COMMISSION
Washington DC 20463

MEMORANDUM

TO LAWRENCE M NOBLE
GENERAL COUNSEL

FROM MARJORIE W EMMONS/LISA R DAVIS
COMMISSION SECRETARY

DATE FEBRUARY 19, 1998

SUBJECT Case Closures Under Enforcement Priority. General Counsel s Report dated February 11, 1998.

The above-captioned document was circulated to the Commission on **Thursday, February 12, 1998**

Objection(s) have been received from the Commissioner(s) as indicated by the name(s) checked below

Commissioner Aikens	_
Commissioner Elliott	_
Commissioner McDonald	XXX
Commissioner McGarry	_
Commissioner Thomas	XXX

This matter will be placed on the meeting agenda for

Tuesday, February 24, 1998

Please notify us who will represent your Division before the Commission on this matter

AGENDA DOCUMENT NO. X98-13

2304336232

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	Agenda Document
Case Closures Under	)	No. X98-13
Enforcement Priority	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on February 24, 1998, do hereby certify that the Commission took the following actions with respect to Agenda Document No. X98-13:

1. Failed in a vote of 3-2 to pass a motion to approve the General Counsel's recommendations, subject to amendment of the closing date in recommendation A to read March 2, 1998, and subject to deletion of those cases listed in footnote 4 on Page 3 of the staff report.

   Commissioners McDonald, McGarry, and Thomas voted affirmatively for the motion. Commissioners Aikens and Elliott dissented.

2. Decided by a vote of 5-0 to

   A. Decline to open a MUR, close the file effective March 2, 1998, and approve the appropriate letters in the following matters:

   1. RAD 96NF-09
   2. RAD 96L-12
   3. RAD 97NF-02
   4. Pre-MUR 346
   5. Pre-MUR 356

(continued)

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B. Take no action, close the file effective March 2, 1998, and approve the appropriate letters in the following matters:

1.	MUR 4350	20.	MUR 4601
2.	MUR 4355	21.	MUR 4602
3.	MUR 4372	22.	MUR 4604
4.	MUR 4394	23.	MUR 4605
5.	MUR 4472	24.	MUR 4631
6.	MUR 4483	25.	MUR 4661
7.	MUR 4504	26.	MUR 4667
8.	MUR 4507	27.	MUR 4668
9.	MUR 4509	28.	MUR 4672
10.	MUR 4565	29.	MUR 4673
11.	MUR 4570	30.	MUR 4676
12.	MUR 4571	31.	MUR 4677
13.	MUR 4572	32.	MUR 4681
14.	MUR 4575	33.	MUR 4683
15.	MUR 4585	34.	MUR 4684
16.	MUR 4589	35.	MUR 4694
17.	MUR 4592	36.	MUR 4695
18.	MUR 4593	37.	MUR 4696
19.	MUR 4599	38.	MUR 4703

Commissioners Aikens, Elliott, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

2-25-98
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 2, 1998

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Harold B. Smith, Chairman
Illinois Republican Party
320 South Fourth Street
Springfield, IL 62701-02

RE: MUR 4572

Dear Mr. Smith

On November 5, 1996, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action in the matter. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on March 2, 1998. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

9804383623505

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 2, 1998

Mr. Joseph E. Sandler, General Counsel
DNC Services Corporation/
Democratic National Committee
430 South Capitol Street, S.E.
Washington, D.C. 20003

RE: MUR 4572
DNC Services Corporation/Democratic National Committee, and Carol Pensky, as treasurer

Dear Mr. Sandler:

On November 13, 1996, the Federal Election Commission notified R. Scott Pastrick, fromer treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that nonification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against DNC Services Corporation/Democratic National Committee, and Carol Pensky, as treasurer. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in the matter on March 2, 1998.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith on our toll-free telephone number, (800) 424-9530. Our local telephone number is (202) 694-1650.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

9804336C

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 2, 1998

Mr. William R. Quinlan, Esquire
Mr. John F. Kennedy, Esquire
Mr. John O'Malley, Esquire
Quinlan & Crisham, Ltd
161 N. Clark, Suite 2300
Chicago, IL 60601

RE: MUR 4572
Democratic Party of Illinois, John A. Gianulis, as treasurer, Friends of Dick Durbin, Michael Daly, as treasurer, The Honorable Richard Durbin, United Democrats of Illinois, John A. Gianulis, as treasurer, and Illinois Victory '96

Dear Messrs. Quinlan, Kennedy, and O'Malley

On November 13, 1996, the Federal Election Commission notified your clients of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against your clients. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in the matter on March 2, 1998.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith on our toll-free telephone number, (800) 424-9530. Our local telephone number is (202) 694-1650.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 2, 1998

Ms. Judith L. Corley, Esquire
Mr. Robert F. Bauer, Esquire
Perkins Coie
607 Fourteenth Street, N.W.
Washington, D.C. 20005-2011

RE: MUR 4572
Democratic Senatorial Campaign Committee and Paul Johnson, as treasurer

Dear Ms. Corley and Mr. Bauer:

On November 13, 1996, the Federal Election Commission notified your clients of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against your clients. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in the matter on March 2, 1998.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith on our toll-free telephone number, (800) 424-9530. Our local telephone number is (202) 694-1650.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

THIS IS THE END OF MUR # 4572

DATE FILMED 3/11/98 CAMERA NO. 2

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