

KNOX COUNTY DEMOCRATS

1220 Bridge Avenue * Galesburg, Illinois 61401 * 309/342-2009 FAX: 309/342-2728

Jennifer H. Boyt
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

July 28, 2000

Re: MUR 5031 - Knox County Democratic Central Committee, Janet K. Hill, Chairman, Jeremy S. Karlin, Treasurer

Dear Ms. Boyt:

This is in response to the Federal Election Commission's letter of June 22, 2000, regarding a complaint filed against the above mentioned parties. We believe the complaint is baseless and should be dismissed.

Some background on the Committee may be helpful before addressing the allegations we understand from the complaint. The Knox County Democratic Central Committee is a subordinate party committee of the Illinois Democratic Party. It is responsible for the day-to-day activities of the Party in the Galesburg region of Illinois. It has, for many years, conducted coordinated campaign efforts for Democratic candidates in this region. Those efforts have consisted primarily of assisting in educating the public about Democratic Party issues and getting people out to vote on election day. The Committee is not, nor has it ever been, registered with the Federal Election Commission. It is registered with and filed periodic reports with the State of Illinois.

The complaint by the Rock Island Republican Central Committee goes on at great length to provide "evidence" that the Committee is affiliated with the Democratic Party of Illinois. The Committee confirms that it is affiliated with the state party.

The complaint also alleges that the Committee aired radio commercials to benefit Galesburg area Congressional Candidate Lane Evans and hereby made an excessive contribution to his campaign. As noted above, the Committee has never been registered with the FEC and is, therefore, not particularly well versed in the requirements of federal campaign law. Our understanding, however, was that the Committee could undertake certain general party get-out-the-vote activities for the candidates seeking election as Democrats, including activities that involved a Federal candidate, without incurring a registration and reporting obligation. Among the activities undertaken, the Committee has traditionally placed advertising in local newspapers and on local radio stations to encourage voters to go to the polls and to vote for Democratic party candidates. The advertisement cited by the Complaint was a part of the Committee's GOTV efforts during the 1998 election. As you can see from the amount in question (\$1,046), the effort was rather modest in scope. {1}

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Caroline Porter	Norman Winick	Dale Parsons	Michele Henry	Jeremy Karlin	Yvonne Tabb
Chair	1st Vice Chair	2nd Vice Chair	Secretary	Treasurer	Women's Chair

Finally, the Complaint alleges that the Committee failed to register with the FEC as a political committee. As noted in the discussion above, the Committee believed its efforts were part of a more general exempt GOTV drive in the area. We now understand that public political advertising cannot be a part of this exempt activity. However, even if the radio advertisement were considered to be a federal expenditure, it was for only \$1,046, technically over the \$1000 threshold, but such a small amount as to be meaningless. And if some portion of the advertisement is attributed to the Committee's GOTV effort (on a time/space allocation basis), it would in all likelihood be below the threshold.

The Committee has revised its procedures for the upcoming elections and will ensure that its GOTV activities fall within the exempt activities permitted to a non-registered local party committee. Because of the de minimus amount in question, we ask that this matter be dismissed.

Sincerely,



Caroline Porter, Chair
Knox County Democratic Central Committee

{1} The Committee receives contributions from individuals and other nonfederal committees. At all times in question, the Committee had at least \$1,000 from individuals in its account.

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