

Carol Deitch  
Highland Park, IL 60035

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OFFICE OF GENERAL  
COUNSEL

September 20, 2010

Thomasenia Duncan  
General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

MUR # 6385

Dear Ms. Duncan,

Pursuant to 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4, please accept this letter as a complaint against Dan Seals, Dan Seals for Congress (the "Committee"), and the contributors set forth below, for violations of the Federal Election Campaign Act of 1971, as amended (the "Act"), and Federal Election Commission ("FEC" or the "Commission") regulations. Specifically, Mr. Seals and the Committee accepted at least nine (9) contributions, totaling \$25,550, that were reported as contributions for Mr. Seals' primary election, but were received well after the primary election date. These contributions do not appear to have been for the purpose of retiring primary election-related debt. Excessive and/or improper contributions appear to have been made by the following committees:

- 1) American Association For Justice Political Action
- 2) American Federal of State, County & Municipal Employees
- 3) Communications Workers of America - COPE Political
- 4) International Brotherhood of Electrical Workers Political
- 5) Progressive Choices PAC
- 6) Service Employees International
- 7) Taking The Hill PAC
- 8) We The People PAC
- 9) Roberta Goldberg

**I. Facts**

Dan Seals for Congress is the authorized principal campaign committee for Daniel Joseph Seals. Mr. Seals' FEC Form 2 Statement of Candidacy, filed December 10, 2008, indicates that Mr. Seals is a Democratic candidate for the U.S. House of Representatives in Illinois' 10<sup>th</sup> Congressional District. Mr. Seals won the Illinois Democratic Party's primary nomination on February 2, 2010.

The Committee's 12-Day Pre-Election Report, filed January 21, 2010, stated that the Committee had \$145,760.08 cash on hand as of January 13, 2010. As of that same date, the Committee reported owing no debts.

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The Committee's April 15 Quarterly Report, filed April 15, 2010, and covering the period January 14, 2010 – March 31, 2010, reports \$458,053.50 cash on hand as of March 31, 2010, with debts and obligations of \$26,668.87 owed by the Committee.

Between February 14 – March 31, 2010, following Mr. Seals' primary election date, the Committee received at least nine (9) contributions that were designated for the February 2, 2010, primary election.

<i>Contributor</i>	<i>Reported Date of Receipt</i>	<i>Contribution Amount</i>
American Association for Justice Political Action	03/21/2010	\$5,000
American Federation of State, County & Municipal Employees	03/29/2010	\$5,000
Communications Workers of America – COPE Political Action	03/25/2010	\$1,500
International Brotherhood of Electrical Workers Po	03/29/2010	\$5,000
Progressive Choices PAC	03/07/2010	\$2,000
Service Employees International	03/30/2010	\$5,000
Taking The Hill PAC	03/31/2010	\$1,000
We The People PAC	03/31/2010	\$1,000
Roberta Goldberg	02/14/2010	\$50
<b>Total</b>		<b>\$25,550</b>

The contributions detailed above appear to have been made by the respective donors, and accepted by the Committee, in violation of 2 U.S.C. § 441a(a)(1) – (2) and 11 C.F.R. §§ 110.1(b) and 110.2(b).

Thus, upon information and belief, and based upon the facts set forth above, Dan Seals, Dan Seals for Congress, and the contributors set forth above, have violated the Federal Election Campaign Act of 1971, as amended, and Federal Election Commission regulations. I respectfully request that the Commission undertake an investigation into the aforementioned violations and impose the maximum penalty under the law.

The foregoing is correct and accurate to the best of my knowledge, information and belief.

Sincerely,

*Carol Deitch* (DUC# D320-1125-6640)

Subscribed & sworn to before me on this 20<sup>th</sup> day of September 2010

*[Signature]*  
09/20/10

