



The Allen County Democratic Party

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Ms. Kristi Robertson
Co-Director
Indiana Election Division
302 W. Washington Street
Room E-204
Indianapolis, IN 46204

Dear Co-Director Robertson

In reviewing campaign finance reports from the year ending 2005, I have discovered an irregularity which I believe warrants investigation by your office.

On May 13, 2005 there were two events held at the Grand Wayne Center in Fort Wayne. Specifically, these events were the Allen County Republican Party Lincoln Day Dinner and a "Glenn Beck Rally for America". The "Rally for America" was promoted heavily by a local radio station, WOWO, which is owned by Federated Media. WOWO even provided a "live remote" at the event as well as having several of their "on-air" personalities appear on stage during the event.

On January 31, 2006, a representative of our party went to the Grand Wayne Center to view the contract documents for the events of May 13, 2005. There were two separate contracts- one for the Allen County Republican Party, and a second one for the Northeast Indiana PAC for Better Government (NIPACBG) which was used for the "Rally for America" event. Both contracts show Cathy Hawks, Vice-Chair of the Allen County Republican Party, as the contact person. Both contracts were signed by Steve Shine, Chairman of the Allen County Republican Party (ACRP).

A review of campaign finance reports filed by both NIPACBG and the ACRP raise questions about the nature of the "Rally for America" event, and whether or not it was a political event.

NIPACBG's report lists a payment to the Grand Wayne Center for "facilities for fund raiser". If the event is deemed to **not** be political, then it appears NIPACBG violated laws regarding the spending of PAC funds. According to the 2006 Indiana Campaign Finance Manual, PAC money may be used only to defray any expenses reasonable related to the political action committee's continuing political activity or to make an expenditure to any national, state, or local committee of any political party or a candidate's committee.

If the event was political in nature, then I believe that WOWO would fall under campaign finance guidelines, with a corporate limit of \$2,000. Given the heavy promotion they gave to the event, I would assume that the value would easily exceed \$2,000.

I am turning this matter to the State Election Commission, rather than the Allen County Election Board, because it appears that vast majority of NIPACBG's spending is done at the state level, and it is my understanding that this matter therefore falls under your jurisdiction.

Respectfully,

Kevin R. Knuth
Chairman, Allen County Democratic Party