



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

January 19, 2005

Robert E. Gleason, Treasurer  
International Longshoremen's Association  
AFL-CIO Committee on Political Education  
ILA-COPE  
17 Battery Place  
New York, NY 10004

Response Due Date:  
February 18, 2005

Identification Number: C00158576

Reference: Amended Mid-Year Report (1/1/03-6/30/03), received 12/10/04

Dear Mr. Gleason:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Line 11(a)(i) of the Detailed Summary Page discloses \$367,156.30 in what appear to be unitemized receipts from individuals/persons other than political committees during the reporting period. Please clarify whether this figure includes any receipts from a single source that aggregate greater than \$200 in the calendar year. If this is the case, please amend your report(s) by itemizing the receipts on Schedule A supporting Line 11(a)(i), 2 U.S.C. §434(b)(2)(A) and (3)(A)

-Schedule A supporting Line 17 of your report discloses one or more receipts totaling \$103,069.60 from "HSBC" and "Prudential." Please amend your report to clarify the nature of these receipts.

-Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

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If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Please amend Schedule B supporting Line 23 by providing the address, office sought (House, Senate, or President), state, and congressional district (if applicable) for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

-Schedule B supporting Line 23 discloses contributions to federal candidates for which no election designation has been provided. Please note that if no designation is included in your report, the contributions will be attributed to the next upcoming election for the recipient candidate. Thus, for future reporting purposes, it is in your committee's interest to designate the appropriate election in order to avoid the appearance of excessive contributions made to federal candidates by your committee.

**Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee.**

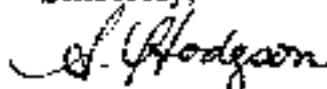
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Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1140.

Sincerely,



Abbie Hodgson  
Campaign Finance Analyst  
Reports Analysis Division

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Recipient Name	Date	Amount	Election	Report
Friends of Patrick J. Kennedy Inc	3/25/03	\$5,000	2004 Primary	2003 Mid-Year
Friends of Patrick J. Kennedy Inc	6/3/03	\$5,000	2004 Primary	2003 Mid-Year
Peter Deutsch for Congress	11/30/99	\$2,500	2004 Primary	1999 Year End
Peter Deutsch for Congress	6/28/01	\$2,500	2004 Primary	2001 Mid Year
Peter Deutsch for Congress	4/17/03	\$2,500	2004 Primary	2003 Mid-Year

