



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 10, 2008

Vincent J. Bollon, Treasurer
International Association of Firefighters
Interested in Registration and Education PAC
1750 New York Ave. NW
Washington, DC 20006

Response Due Date:
October 10, 2008

Identification Number: C00029447

Reference: Year End Report (12/1/07-12/31/07)

Dear Treasurer:

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. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 items:

1. Schedule E of your report discloses a total of \$3,556.16 in payments to your connected organization for "Web Site Maintenance" in support of Christopher J. Dodd. 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund. Further, 11 CFR §114.2(f) prohibits corporations and labor organizations from facilitating the making of contributions to candidates or political committees, other than to the separate segregated funds of the corporations and labor organizations. Facilitation means using corporate or labor organization resources or facilities to engage in fundraising activities in connection with any federal election. The use of corporate or labor organization resources in connection with a fundraiser may be permissible for certain fundraising activities only if the corporation or labor organization receives **advance** payment for the fair market value of such services. 11 CFR §114.2(f)(2)(i)(A), (C) and (E)

Please amend your report to clarify whether the payment to your connected organization was for expenditures which were intended to influence federal elections and provide the dates of the activity conducted by your connected

28039851059

INTERNATIONAL ASSOCIATION OF FIREFIGHTERS INTERESTED IN
REGISTRATION AND EDUCATION PAC

Page 2

organization. In addition, please clarify whether your committee made advance payment for these services to your connected organization. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

2. 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.

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 note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. 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. **Requests for extensions of time in which to respond will not be considered.**

28059851060

INTERNATIONAL ASSOCIATION OF FIREFIGHTERS INTERESTED IN
REGISTRATION AND EDUCATION PAC

Page 3

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) 694-1139.

Sincerely,

Nicole Della Rocco

Nicole Della Rocco
Campaign Finance Analyst
Reports Analysis Division

303

28039831061

INTERNATIONAL ASSOCIATION OF FIREFIGHTERS INTERESTED IN
REGISTRATION AND EDUCATION PAC

Page 4

Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
Graves For Congress	3/29/07	\$2,500	*G-2008	2007 Mid-Year	International Association of Fire Fighters, Local 42 Political Action Committee
Graves For Congress	12/13/07	\$5,000	G-2008	2007 Year End	International Association of Firefighters Interested in Registration and Education PAC

*Schedule B of your affiliate's report discloses this contribution as designated to the 2007 General election; however, this candidate did not participate in a General election in 2007. Therefore, this contribution has been attributed to the next scheduled General election for this candidate, the 2008 General.

28039851062

28039831063

