



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

February 21, 2017

BRIAN BURROWS, TREASURER
INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS LOCAL 98
COMMITTEE ON POLITICAL EDUCATION
1719 SPRING GARDEN STREET
PHILADELPHIA, PA 19130

Response Due Date
03/28/2017

IDENTIFICATION NUMBER: C00162818

REFERENCE: AMENDED 30 DAY POST-GENERAL REPORT (10/20/2016 -
11/28/2016), RECEIVED 01/06/2017

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 3 item(s):

1. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "10/16 & 11/16 Consulting", "10/16 Consulting", "10/16 GOTV", "12/16 Consulting", "7/16 & 10/16 Non-Fed Consulting Services", "Consulting Services", and "Non-Fed Consulting." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf.

2. Schedule E of your report indicates that your committee may have failed to timely file one or more of the required 24 hour report(s) regarding "last minute" independent expenditures (see attached). A political committee must file a 24 hour report with the Federal Election Commission as specified in 11 CFR §104.4(c), within 24 hours of any independent expenditures of \$1,000 or more with respect to a given election, made between two and twenty days before an election. The report must be received by the Commission by 11:59 p.m. on the

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day following the date on which independent expenditures that aggregate \$1,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. (11 CFR §104.3(b))

3. Schedule E supporting Line 24 of your report discloses an independent expenditure(s) on behalf of Hillary Clinton and Katie McGinty which appears to have been publicly disseminated or distributed after the general election date. Please be advised that if a communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated or distributed, and on a Schedule D if it is a reportable debt under 11 CFR § 104.11. When the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable.

Please amend your report to provide further clarifying information regarding the independent expenditure(s) disclosed after the general election date.

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.**

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. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. 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) 694-1133.

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Sincerely,

A handwritten signature in black ink, appearing to read "Chris Morse", written in a cursive style.

Christopher Morse
Senior Campaign Finance Analyst
Reports Analysis Division

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Late 24 Hour Report (Schedule E)**International Brotherhood of Electrical Workers Local 98 Committee on Political Education
(C00162818)**

Name of Payee	Dissemination Date	Amount	Candidate	Election	Report Received
Jaworski Sign Company	10/26/16	\$1,025.00	Clinton, Hillary, Rodham	G2016	1/9/17
Strasheim Graphic & Design Press Corp	11/1/16	\$2,417.04	Clinton, Hillary, Rodham	G2016	1/9/17
Third Base Sports & Trophies	11/1/16	\$36,380.00	Clinton, Hillary, Rodham	G2016	1/9/17
Strasheim Graphic & Design Press Corp	11/1/16	\$4,811.40	Clinton, Hillary, Rodham	G2016	1/9/17
Strasheim Graphic & Design Press Corp	11/1/16	\$4,465.80	Clinton, Hillary, Rodham	G2016	1/9/17