



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-1

February 26, 2013

MILDRED SALDANA, TREASURER
PHILADELPHIA JOINT BOARD POLITICAL
ACTION COMMITTEE
22 SOUTH 22ND STREET
PHILADELPHIA, PA 19103

Response Due Date
04/02/2013

IDENTIFICATION NUMBER: C00165324

REFERENCE: AMENDED STATEMENT OF ORGANIZATION, RECEIVED 11/20/2012

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 item(s):

1. Line 6 of your Statement of Organization indicates that "Philadelphia Joint Board Victory PAC" and "Amalgamated Bank PAC" are the connected organizations for your Committee. Please be advised that a connected organization is any organization which 1) is not a political committee and 2) directly or indirectly establishes, administers, or financially supports a political committee. This type of organization includes a corporation, corporation without capital stock, labor organization, membership organization, a cooperative, or a trade association. For further guidance on the question of connected organizations, please refer to 11 CFR §100.6.

If your committee is jointly sponsored by these entities, the full names of these organizations must appear in the name of your committee. (See Advisory Opinions 1988-42 and 1988-14) However, if your committee is not jointly sponsored, and one of these organizations represents a parent company or subsidiary of your connected organization, you need not include its name in the name of your committee. (11 CFR §102.14(c)) Please provide further clarifying information concerning the relationship between these apparent connected organizations, with regard to your separate segregated fund.

2. Please clarify your relationship, if any, with "Local 274 Hotel/Restaurant Employees," which appears to be an affiliated committee. For further guidance on the question of affiliation, please refer to 11 CFR §100.5(g) and §110.3. If

PHILADELPHIA JOINT BOARD POLITICAL ACTION COMMITTEE

Page 2 of 2

your committee is affiliated with Local 274 Hotel/Restaurant Employees," you should amend your Statement of Organization to check the "Affiliated Committee" box on Line 6.

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. 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) 694-1164.

Sincerely,



Nicole Miller
Senior Campaign Finance Analyst
Reports Analysis Division