



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

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

MAR 22 1995

Identification Number: C00158576

Reference: Year End Report (11/29/94-12/31/94)

Dear Mr. Gleason:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide a Schedule H3 to support the entry reported on Line 18 of the Detailed Summary Page. All transfers received from a committee's non-federal account for joint activity must be itemized on Schedule H3 regardless of the amount transferred. 2 U.S.C. §434(b)(3)(D)

-Line 18 of your report discloses a \$100,000 transfer-in from the non-federal account for joint activity. However, there is no shared activity provided on a Schedule H4. In addition, your committee has not participated in shared activity at all in the 1993-1994 election cycle. Please clarify whether this transfer is from an account maintained by your committee for non-federal activity. If so, please be advised that such a transfer is prohibited by 11 CFR §102.5(a)(1)(i) and the full amount of the transfer should be returned to the non-federal account. Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on Schedule B supporting Line 22 of your next report.

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the impermissible

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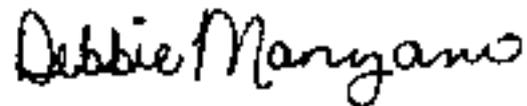
YESTERDAY, TODAY AND TOMORROW  
DEDICATED TO KEEPING THE PUBLIC INFORMED

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funds or clarification of the transaction, will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Debbie Manzano  
Reports Analyst  
Reports Analysis Division

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