



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

February 25, 2004

James A. Grogan, Treasurer
International Association of Heat & Frost
Insulators and Asbestos Workers PAC
9602 Martin Luther King Highway
Lanham, MD 20706

Response Due Date:
March 26, 2004

Identification Number: C00115527

Reference: Year-End Report (7/1/03-12/31/03)

Dear Mr. Grogan:

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:

-Schedule A of your report (see attached) discloses one or more contributions from an organization(s), which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible.

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To the extent that your committee has received prohibited funds, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR §103.3(b)(1).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Please amend Schedule B supporting Line 23 by providing the office sought, state, and district for each contribution to a federal committee/candidate made. 11 CFR §104.3(b)(3)(ii) and (v)

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions from federally registered committees/candidates should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing.

-For future reporting, please be advised that only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 29.

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-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. 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 1, then press 2 to reach the Reports Analysis Division) or my local number (202) 694-1152.

Sincerely,



Kristen Davis
Campaign Finance Analyst
Reports Analysis Division

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Receipt from an Unregistered Committee(s)

Contributor Name	Date	Amount
Billie Keller for State Representative	08/27/03	\$500.00
Blackmon for Lt. Governor	10/29/03	\$500.00
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Citizens for Chris Coons	12/22/03	\$600.00
Committee for Alicia Reece	09/11/03	\$100.00
Committee for Alicia Reece	09/11/03	\$500.00
Committee for Panella to Superior Court	10/22/03	\$1,000.00
Committee to Elect Judge Panella to Superior Court	10/13/03	\$500.00
Committee to Elect Judge Panella to Superior Court	10/14/03	\$500.00
Committee to Elect Kathy L. Holtzman	09/19/03	\$250.00
Committee to Elect Max Baer	09/12/03	\$500.00
Committee to Elect Max Baer	12/17/03	\$1,000.00
Crowley for Council	09/11/03	\$500.00
Crowley for Council	09/11/03	\$500.00
Democratic Campaign of Philadelphia	09/08/03	\$500.00
Democratic Executive Committee of Philadelphia	11/24/03	\$250.00
Democratic Majority Pac	10/22/03	\$1,000.00
Friends of Dennis Cahill	08/27/03	\$350.00
Friends of Joan Krajewski	08/14/03	\$100.00
Friends of John F. Street	10/24/03	\$1,000.00
Friends of John F. Street	10/24/03	\$1,000.00
Friends of Sidel	09/05/03	\$300.00
Friends of Seamus McCaffery	09/26/03	\$500.00
Friends of Skrepnak & Vonderheid	10/13/03	\$250.00
IADLC	10/31/03	\$1,000.00
Luzerne County Democratic Party	10/13/03	\$100.00
Newell for Schoolboard Committee	10/29/03	\$300.00
Political Education Fund of BCTD	12/12/03	\$400.00
Political Education Fund of BCTD	12/17/03	\$300.00
Ronnie Musgrove for Governor	09/03/03	\$500.00
The Philadelphia Future	07/30/03	\$500.00
The Public Record Pre-Election Bash	08/27/03	\$450.00

