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December 14, 1998

Mrs. Debbie Chacona
Senior Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

Re: Amended October 1998 Quarterly Report

Dear Mrs. Chacona:

As you are aware, our office represents the International Longshoremen's Association, AFL-CIO, Committee on Political Education ("ILA-COPE"). We write in response to your letter dated November 18, 1998, regarding the above-referenced report filed by our client. In your letter you raise four questions in connection with your review of the report.

First, you note that Schedule B of the October 1998 quarterly report discloses a contribution which appears to exceed the limits set forth in the Act. Please note that the April 1997 contribution should have been designated as a primary contribution.

Second, you note that Schedule B of the report discloses a contribution to a national political party which appears to exceed the limits set forth in the Act. Please be advised that we should have indicated that only \$15,000.00 was a federal contribution. The balance in the amount of \$75,000.00 should have been designated as a non-federal contribution.

Third, you noted that Line 17 discloses receipts for dividends and interest. You then state that the report should be amended to itemize any receipts from a single source that aggregate more than \$200.00 in the calendar year. No single individual contributed more than \$200.00 in the calendar year. We did submit with the report as Exhibit B a monthly

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itemization of all dividends and interest earned in the investment accounts with Marine Midland Bank, Prudential Securities and Cowen & Company. This exhibit details by month all dividends and interest earned by ILA-COPE.

Fourth, you point out that Schedule B supporting line 23 discloses a contribution to various State Elections and Senate President Committee. You then question whether this is a federal committee. Please note that this is not a federal committee.

We trust this responds to the issues raised in your letter.

Very truly yours,

GLEASON & MATHEWS, P.C.

By: 
Kevin Marrinan

KM/dk

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Federal Election Commission

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