



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

MAY 01 2002

Identification Number: C00158576

Reference: Amended Mid-Year Report (1/1/01-6/30/01), received 9/28/01

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:

-Schedule A supporting Line 11(a)(i) of your report discloses receipts in the amount \$44,769.01 that does not disclose the contributor's name and address and \$108,340.58 from HSBC, both for what appear to be check-off contributions. Please be advised that federal regulations require the itemization of all contributions from individuals/persons that aggregate greater than \$200 in the calendar year. Please clarify whether this figure includes any receipts that aggregate greater than \$200 from an individual person. Further, please provide the contributor's name and address for the \$44,769.01 contribution. 11 CFR §104.3(a)(2)

-Schedule A of your report discloses one or more contributions from an organization which is not a political committee registered with the Commission (pertinent portion(s) attached). In addition, the contribution(s) appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) precludes a political committee from receiving contributions from a person or another committee in excess of \$5,000 in a calendar year. Also, in order to make contributions to your committee, organizations which are not political committees must either: 1) establish a separate account which

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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. 11 CFR §102.5(b)

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of 2 U.S.C. §§441a(f) and 441b. If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR §102.5(a).

In order to be in compliance with the Act, your committee must: 1) refund to the donor or transfer-out to a non-federal account, the amount in excess of \$5,000 within 60 days of receipt and provide written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored. And 2) determine the extent to which your committee received funds that are not permissible, and refund or transfer-out the prohibited funds.

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).

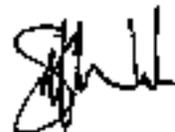
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. Should you choose to transfer-out or refund the funds, the Commission will presume the funds were impermissible, absent a statement from your committee to 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 they are made.

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Although the Commission may take further legal action concerning the acceptance of prohibited and excessive contribution(s), your prompt refund or transfer-out will be taken into consideration.

A 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. Electronic filers must file amendments (to include statements, designation 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 need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Scott B. Walker  
Reports Analyst  
Reports Analysis Division

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

Use separate schedule(s)  
or each category of the  
Detailed Summary Page

FOR LINE NUMBER: PAGE 5 / 52

(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17
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Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)  
INTERNATIONAL LONGSHOREMEN'S ASSOCIATION AFL-CIO COMMITTEE ON POLITICAL EDUCATION  
ILA-CO

**A.**

Full Name (Last, First, Middle Initial)  
Mailing Address  
City State Zip Code  
FEC ID number of contributing federal political committee.  
Name of Employer Occupation  
Receipt For: Primary General Other (specify)     
Aggregate Year-to-Date  44768.01  
Date of Receipt  02  28  2001  
Amount of Each Receipt this Period  44768.01  
check-off contribution  
Transaction ID: SA11A1.1494

**B.**

Full Name (Last, First, Middle Initial)  
CAMPAIGN ACCOUNT OF MARIA ESPONOSA DENNIS  
Mailing Address  
1470 NORTHWEST 107TH AVENUE  
City State Zip Code  
MIAMI FL 33172  
FEC ID number of contributing federal political committee.  
Name of Employer Occupation  
Receipt For: Primary General Other (specify)     
Aggregate Year-to-Date  75413.36  
Date of Receipt  01  31  2001  
Amount of Each Receipt this Period  75413.36  
check-off contributions  
Transaction ID: SA11A1.1493

**C.**

Full Name (Last, First, Middle Initial)  
HSBC  
Mailing Address  
17 BATTERY PLACE  
City State Zip Code  
NEW YORK NY 10004  
FEC ID number of contributing federal political committee.  
Name of Employer Occupation  
Receipt For: Primary General Other (specify)     
Aggregate Year-to-Date  55484.05  
Date of Receipt  03  30  2001  
Amount of Each Receipt this Period  55484.05  
Check-off contribs  
Transaction ID: SA11A1.1690

SUBTOTAL of Receipts This Page (optional)  175645.42  
TOTAL This Period (last page this line number only)

