



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 14, 2008

RQ-2

William Lucy, Treasurer  
American Federation of State County &  
Municipal Employees - P E O P L E, Qualified  
1625 L Street NW  
Washington, DC 20036

Response Due Date:  
June 16, 2008

Identification Number: C00011114

Reference: February Monthly Report (1/1/08-1/31/08)

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 4 items:

1. Schedule D supporting Line 10 of your 2007 Year End Report (12/1/07-12/31/07) disclosed a debt incurred during the period totaling \$401 owed to EAGLE SIGN COMPANY for apparent independent expenditures. However, a MEMO Schedule E was not provided, but rather paid in full Schedule E on the 2008 February Monthly Report (1/1/08-1/31/08). Please be advised that if a communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated and on a Schedule D if it is a reportable debt under 11 CFR §104.11. Subsequently, when the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable. Please amend your report(s) to clarify this apparent discrepancy or provide clarifying information regarding the nature of this debt.
2. Your committee has filed a 24 hour notice for an independent expenditure supporting Hillary Clinton (see attached) which has not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on 24 hour notices must also be itemized on a corresponding Schedule E or MEMO

28039730278

AMERICAN FEDERATION OF STATE COUNTY & MUNICIPAL EMPLOYEES -  
P E O P L E, QUALIFIED

Page 2

Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend your report and any subsequent reports that may be affected by this correction.

3. Schedule E, supporting Line 24 of your report, discloses several independent expenditures on behalf of Hillary Clinton which appear to have been distributed or publicly disseminated after the primary dates in the respective states. Please be advised that if the communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated and on a Schedule D if it is a reportable debt under 11 CFR 104.11. When the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable. Please amend your report to provide further clarifying information regarding the independent expenditures disclosed after the primary dates.

4. Schedule B discloses expenditures for "Nevada ID Calls" and "California ID Calls." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

**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.**

28039730279

AMERICAN FEDERATION OF STATE COUNTY & MUNICIPAL EMPLOYEES -  
P E O P L E, Q U A L I F I E D

Page 3

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) 694-1135.

Sincerely,



Erinn D. Larkin  
Campaign Finance Analyst  
Reports Analysis Division

309

28039730280

24 / 48 HOUR NOTICE OF INDEPENDENT / COORDINATED EXPENDITURE, on :

FEC ID No.

24-Hour Notice  48-Hour Notice

SCHEDULE E (FEC Form 3X)  
ITEMIZED INDEPENDENT EXPENDITURES

PAGE OF 2 / 2  
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full)  
**AMERICAN FEDERATION OF STATE COUNTY & MUNICIPAL EMPLOYEES - P E O P L E, Q U A L I F I E D**

FEC IDENTIFICATION NUMBER  
**C C00011114**

Check if  24-hour notice  48-hour notice

Full Name (Last, First, Middle, Initial) of Payee  
**WINNING CONNECTIONS INC.**

Date  
MM / DD / YYYY  
**01 / 31 / 2008**

Mailing Address  
**317 Pennsylvania Ave., SE  
2nd Floor**

Amount  
**11118.78**

City State Zip Code  
**Washington DC 20003**

Office Sought:  House State: CA  
 Senate District: 00  
 Presidential

Purpose of Expenditure  
**CA Persuasion Calls**

Category/Type  
**007**

Check One:  Support  Oppose

Name of Federal Candidate supported or Opposed by expenditure:  
**HILLARY CLINTON (CA)**

Disbursement For:  Primary  General 2008  
 Other (specify) : \_\_\_\_\_

Calendar Year-To-Date Per Election  
for Office Sought **364237.53**

Transaction ID: **SE.103785**

EL

28039730281

(a) SUBTOTAL of Itemized Independent Expenditures .....	<b>11118.78</b>
(b) SUBTOTAL of Unitemized Independent Expenditures .....	
(c) TOTAL Independent Expenditures .....	<b>93384.85</b>

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

**WILLIAM LUCY**  
Signature

MM / DD / YYYY  
**02 / 01 / 2008**

28039730282

