



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

July 21, 2010

Alan Pero, Treasurer  
International Union of Operating Engineers  
Local 17 Political Action Committee  
5959 Versailles Road  
Lakeview, NY 14085

**Response Due Date:  
August 25, 2010**

Identification Number: C00104455

Reference: July Quarterly Report (4/1/10-6/30/10)

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 2 items:

1. Schedule A supporting Line 11(a)(i) of your report discloses a negative entry to represent an apparent transfer-out of \$3,411.03 to "Engineers Joint Benefit Funds" for the apparent misdeposit of contributions originally intended for an apparent non-federal account. You are advised that contributions deposited in either a federal account or an account used for both federal and non-federal activity must meet the following conditions: the contributions are designated or expressly solicited for use in connection with federal elections and contributors are informed that their contributions are subject to the limits and prohibitions of the Act. 11 CFR §102.5(a) Please provide the date of the original deposit into the federal account and amend the appropriate report to disclose the receipt of these funds on Schedule A supporting the appropriate line of the Detailed Summary Page.

Although the Commission may take further legal action regarding the misdeposited funds, your prompt action in refunding or transferring out this amount will be taken into consideration.

2. Schedule A supporting Line 11(a)(i) of your report discloses a negative entry for the apparent transfer-out of funds originally intended for an apparent non-federal account. Please be advised that if your committee

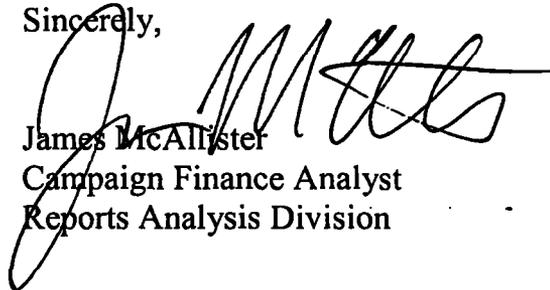
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wrote a refund check from your account, this disbursement should be disclosed on Schedule B supporting Line 22 of the Detailed Summary Page. Negative entries on Schedule A should only be used to disclose voided checks that were not cashed or cleared by a bank. This method of reporting would clarify for the public record the total amount of receipts/disbursements and more accurately disclose the cash-on-hand amount. Please clarify the nature of this transaction and, if necessary, amend your report to properly disclose it.

**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.**

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) 694-1140.

Sincerely,



James McAllister  
Campaign Finance Analyst  
Reports Analysis Division

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