



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 23, 2011

ROBERT GLEASON, TREASURER
INTERNATIONAL LONGSHOREMEN'S ASSOCIATION
AFL-CIO COMMITTEE ON POLITICAL EDUCATION
ILA-COPE
17 BATTERY PLACE
NEW YORK, NY 10004

Response Due Date
04/27/2011

IDENTIFICATION NUMBER: C00158576

REFERENCE: YEAR-END REPORT (11/23/2010 - 12/31/2010)

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 3 item(s):

1. The totals listed on Lines 16 and 17, Column B of the Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.
2. Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the 2010 Primary and General elections; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant

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to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

3. Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which

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the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

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) 694-1141.

Sincerely,



Daniel Buckley
Senior Campaign Finance Analyst
Reports Analysis Division

Contribution After Primary Election Date:

Recipient Name	Date	Amount	Election	Election State - Date
TIBERI FOR CONGRESS	11/30/10	\$2,500	P-2010	OH – 5/4/10

Contribution After General Election Date:

Recipient Name	Date	Amount	Election	General Election Date
AL GREEN FOR CONGRESS	12/22/10	\$5,000	*G-2010	11/2/10
LOBIONDO FOR CONGRESS	12/20/10	\$2,500	*G-2010	11/2/10
Tim Bishop for Congress	12/8/10	\$1,000	*G-2010	11/2/10

*Schedule B of your report discloses this contribution as designated to the 2010 “Other” election; however, this candidate only participated in a Primary and General election in 2010. Therefore, this contribution has been attributed to the most recent Federal election for this candidate, the 2010 General.

Excessive Contribution To a Candidate:

Recipient Name	Date	Amount	Election	Report
AL GREEN FOR CONGRESS	12/17/09	\$5,000	*G-2010	2009 Year End
AL GREEN FOR CONGRESS	12/22/10	\$5,000	**G-2010	2010 Year End

*Schedule B of your report discloses this contribution as designated to the 2009 General election; however, this candidate did not participate in a General election in 2009. Therefore, this contribution has been attributed to the next scheduled Federal General election for this candidate, the 2010 General.

**Schedule B of your report discloses this contribution as designated to the 2010 “Other” election; however, this candidate only participated in a Primary and General election in 2010. Therefore, this contribution has been attributed to the most recent Federal election for this candidate, the 2010 General.