

September 26, 2008

Jeffrey Rechenbach, Treasurer Communications Workers of America-COPE Political Contributions Committee 501 Third Street, NW Washington, DC 20001

Response Due Date: October 27, 2008

Identification Number: C00002089

Reference:

July Monthly Report (6/1/08-6/30/08) and August Monthly Report

 $\overline{(7/1/08-7/31/08)}$

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 item:

-Schedule A supporting Line 11(a)(i) of your report(s) discloses contributions received through a payroll deduction plan. You disclose the amount and frequency of the deductions; however, the total amount reported as received from each individual during the period does not appear to correspond to the amount and frequency of the payroll deductions. Please amend your report to clarify this apparent discrepancy.

-Schedule B, supporting Line 23 of your report discloses apparent redesignations of contributions made during a prior reporting period. Please be advised for future filings that redesignations should be disclosed as memo entries on Schedule B, that they should indicate the date the original contribution was made as well as the report on which it was originally itemized, and clearly specify that it is a redesignation. Please see the attached example of proper reporting of this activity.

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) 694-1136.

Singerely,

Jodi Winshio

Senior Campaign Finance Analyst

Reports Analysis Division

SAMPLE Campaign Guide for Corporations and Labor Organizations

does not have to report either the receipt or the return of the contribution.)

5. Reporting Disbursements: The Detailed Summary Page

Line-by-line instructions for filling out the Disbursements portion of the Detailed Summary Page are given below. See Section 4 for information on how to itemize disbursements on Schedule B.An example of a completed Detailed Summary Page appears on page 68. More information on reporting loans, debts and independent expenditures appears later in this chapter.

Line 21. Operating Expenditures
Operating expenditures—also
called administrative expenses and
fundraising expenses—are only
reportable if the SSF pays for them.
(Normally, the connected organization pays these expenses.)

Line 21(a)

Report the federal and nonfederal shares of allocable activities separately on Lines 21(a)(i) and (ii). These numbers will be transferred from Schedule H4 (see Appendix A). Note, however, that Line 21(a) is rarely used by SSFs. See Appendix A.

Line 21(b)

62

Report the total of operating expenditures for unshared SSF activities (i.e., activities paid for exclusively from a federal account) on Line 21(b).

Itemize them on Schedule B for Line 21(b) once payments to any payee exceed \$200 in a calendar year.

Redesignation Original Designation: Year-					
SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS	Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE II (check only 21b 27			
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FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

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Senior Campaign Finance Analyst

Reports Analysis Division

211

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