FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Raymond Gimmler, Treasurer
Metropolitan Transportation Authority
Police Benevolent Association PAC
134 Rockaway Avenue
Valley Stream, WY 11580

MAY 2 8 2003

Identification Number: C00366922

Reference: Year End (7/1/01-12/31/01), April Quarterly (1/1/02-3/31/02), October Quarterly (7/1/02-9/30/02), 12 Day Pre-General (10/1/02-10/16/02) and 30 Day Post-General (10/17/02-11/25/02) Reports

Dear Mr. Gimmler:

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 of your report discloses the receipt of funds from your connected organization (pertinent portion(s) attached). 2 U.S.C. §441b prohibits the receipt of funds from national banks, corporations, and labor organizations. Under 11 CFR §114.5(b)(3), however, a separate segregated fund may be reimbursed for any solicitation or other administrative expense provided that the reimbursement is made no later than thirty days after the expense was paid by the separate segregated fund.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. Please provide further clarifying information regarding the date(s) on which the committee made payments for any solicitation or other administrative expenses.

To the extent that the reimbursement was made beyond thirty days after the expense was paid, 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 your

connected organization of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from your connected organization 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 copy of your check for any transfer-out or refund. In addition, any transfer-out or refund made should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the date on which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to refund or transfer-out the amount will be taken into consideration.

A response or 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, 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 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,

Brandy Phillips

Brandy Phillips
Campaign Finance Analyst
Reports Analysis Division

23038093401

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

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

FOR LINE NUMBER: (check only one) PAGE 5 / 8

[X] 11a [ ] 11b [ ] 11c [ ] 12
[ ] 13 [ ] 14 [ ] 15 [ ] 16 [ ] 17

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)
MTA Police Benevolent Assoc

A.
Full Name (Last, First, Middle Initial)
MTA Police Benevolent Assoc
Mailing Address
134 Rockaway Ave
City: Valley Stream State: NY Zip Code: 11580
FEC ID number of contributing federal political committee: C00366922
Name of Employer
Occupation
Receipt For: Primary General Other (specify)
Aggregate Year-to-Date: 4451.00

Date of Receipt: M M / D D / Y Y Y Y 12 31 2001
Amount of Each Receipt this Period: 4451.00
Contributions
Transaction ID: SA11A1.4126

B.

C.

SUBTOTAL of Receipts This Page (optional) ▶ 4451.00

TOTAL This Period (last page this line number only) ▶ 4451.00

23038093402

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

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

FOR LINE NUMBER: PAGE 5 / 10
(check only one)
[X] 11a [ ] 11b [ ] 11c [ ] 12
[ ] 13 [ ] 14 [ ] 15 [ ] 16 [ ] 17

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NAME OF COMMITTEE (In Full)
MTA Police Benevolent Assoc

A.

Full Name (Last, First, Middle Initial)
MTA Police Benevolent Assoc

Mailing Address
134 Rockaway Ave

City: Valley Stream
State: NY
Zip Code: 11580

FEC ID number of contributing federal political committee.

Name of Employer: MTA Transit Authority
Occupation:

Receipt For: Primary General
Other (specify)

Aggregate Year-to-Date: 2347.50

Date of Receipt: M M / D D / Y Y Y Y
03 31 2002

Amount of Each Receipt this Period: 2347.50

Contributions

Transaction ID: SA11A1.4159

B.

C.

SUBTOTAL of Receipts This Page (optional) ..... ▶ 2347.50

TOTAL This Period (last page this line number only) ..... ▶ 2347.50

23038093403

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

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

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[X] 11a [ ] 11b [ ] 11c [ ] 12
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NAME OF COMMITTEE (In Full)
MTA Police Benevolent Assoc

A.
Full Name (Last, First, Middle Initial): MTA Police Benevolent Assoc
Mailing Address: 134 Rockaway Ave
City: Valley Stream State: NY Zip Code: 11580
FEC ID number of contributing federal political committee.
Name of Employer: MTA Transit Authority
Occupation:
Receipt For: Primary General Other (specify)
Aggregate Year-to-Date: 2347.50
Date of Receipt: M 07 D 31 Y 2002
Amount of Each Receipt this Period: 0.00
Transaction ID: SA11A1.4206

B.
Full Name (Last, First, Middle Initial): MTA Police Benevolent Assoc
Mailing Address: 134 Rockaway Ave
City: Valley Stream State: NY Zip Code: 11580
FEC ID number of contributing federal political committee.
Name of Employer: MTA Transit Authority
Occupation:
Receipt For: Primary General Other (specify)
Aggregate Year-to-Date: 3003.00
Date of Receipt: M 07 D 31 Y 2002
Amount of Each Receipt this Period: 655.50
Transaction ID: SA11A1.4207

C.
Full Name (Last, First, Middle Initial): MTA Police Benevolent Assoc
Mailing Address: 134 Rockaway Ave
City: Valley Stream State: NY Zip Code: 11580
FEC ID number of contributing federal political committee.
Name of Employer: MTA Transit Authority
Occupation:
Receipt For: Primary General Other (specify)
Aggregate Year-to-Date: 3780.00
Date of Receipt: M 08 D 30 Y 2002
Amount of Each Receipt this Period: 777.00
Transaction ID: SA11A1.4208

SUBTOTAL of Receipts This Page (optional) ..... ▶ 1432.50

TOTAL This Period (last page this line number only) ..... ▶

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SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

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

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NAME OF COMMITTEE (In Full)
MTA Police Benevolent Assoc

A.
Full Name (Last, First, Middle Initial)
MTA Police Benevolent Assoc
Mailing Address
134 Rockaway Ave
City: Valley Stream State: NY Zip Code: 11580
FEC ID number of contributing federal political committee:
Name of Employer: MTA Transit Authority
Occupation:
Receipt For: Primary General Other (specify)
Aggregate Year-to-Date: 4555.50

Date of Receipt: M M / D D / Y Y Y Y 09 30 2002
Amount of Each Receipt this Period: 775.50
Transaction ID: SA11A1.4209

B.

C.

SUBTOTAL of Receipts This Page (optional) ..... ▶ 775.50

TOTAL This Period (last page this line number only) ..... ▶ 2208.00

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SCHEDULE A (FEC Form 3X)
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Use separate schedule(s) for each category of the Detailed Summary Page

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NAME OF COMMITTEE (In Full)
MTA Police Benevolent Assoc

A.
Full Name (Last, First, Middle Initial)
MTA Police Benevolent Assoc
Mailing Address
134 Rockaway Ave
City: Valley Stream
State: NY
Zip Code: 11580
FEC ID number of contributing federal political committee.
Name of Employer: MTA Transit Authority
Occupation:
Receipt For: Primary General
Other (specify) ▼
Aggregate Year-to-Date ▼ $328.00

Date of Receipt: M M / D D / Y Y Y Y
10 09 2002

Amount of Each Receipt this Period: 772.50

Dues

Transaction ID: SA11A1.4242

B.

C.

SUBTOTAL of Receipts This Page (optional) ▶ 772.50

TOTAL This Period (last page this line number only) ▶ 772.50

23038093406

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

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

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[X] 11a [ ] 11b [ ] 11c [ ] 12
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NAME OF COMMITTEE (In Full)
MTA Police Benevolent Assoc

A.
Full Name (Last, First, Middle Initial)
MTA Police Benevolent Assoc.

Mailing Address
134 Rockaway Ave

City: Valley Stream
State: NY
Zip Code: 11580

FEC ID number of contributing federal political committee.

Name of Employer: MTA Transit Authority
Occupation:

Receipt For:
Primary General
Other (specify) ▼

Aggregate Year-to-Date ▼
6099.00

Date of Receipt
M M / D D / Y Y Y Y
11 02 2002

Amount of Each Receipt this Period
771.00

Dues

Transaction ID: SA11A1.4247

B.

C.

SUBTOTAL of Receipts This Page (optional) ..... ▶ 771.00

TOTAL This Period (last page this line number only) ..... ▶ 771.00