



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Alfred T. Zlotopolski, Treasurer
Sheet Metal Workers International Association
Political Action League (PAL)
1750 New York Avenue, N.W.
Washington, DC 20006

DEC 19 2001

Identification Number: C00007542

Reference: February Monthly Report (1/1/01-1/31/01)

Dear Mr. Zlotopolski:

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 (pertinent portion(s) attached) discloses a receipt(s) from an organization(s) that is not registered with the Commission. 2 U.S.C. §441b prohibits the receipt of funds from national banks, corporations, and labor organizations. Under 11 CFR §102.6, however, certain entities may serve as collecting agents for the purpose of transmitting contributions to a separate segregated fund. A collecting agent may be, but is not limited to, a committee which is affiliated with the separate segregated fund; the connected organization; or a local, national, or international union.

Funds received from a collecting agent are to be attributed to the original contributors and should be disclosed according to the requirements of 11 CFR §104.3(a). If the amounts in question were contributed by individuals and transmitted to your committee by a collecting agent, the activity should be included on Line 11(a)(i) of the Detailed Summary Page. Any contribution from an individual exceeding \$200 in the aggregate during the calendar year should be itemized on a supporting Schedule A. Collecting agents need not be identified on your report.

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

If you have received funds from an entity which was not serving as a collecting agent, 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 the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor 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 photocopy of your check for any transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Schedule B supporting Line 23 of your report discloses a contribution(s) to "VOTERS CHOICE 98" and "EFFECTIVE GOVERNMENT COMMITTEE"; however, you have disclosed "FEDERAL-(H. REID) and FEDERAL-GEPHARDT", respectively in the purpose of disbursement field(s). Please clarify whether this was an earmarked contribution(s) made by your committee through "VOTERS CHOICE 98" and "EFFECTIVE GOVERNMENT COMMITTEE" to these candidates, or if you made the contribution to the political committees exercising no direction or control over how the funds were to be used. If the latter is the case, please do not include the candidate's names in the purpose of disbursement field. Please amend your report to clarify the ultimate recipient of this contribution(s).

-Schedule B supporting Line 23 of your report discloses a contribution(s) to

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"VOTERS CHOICE 98". Please clarify whether this is a federal committee(s), as there does not appear to be a committee(s) registered with the Commission under this name(s). In the event this is a non-federal committee(s), please disclose it on Schedule B supporting Line 29 of the Detailed Summary Page.

A response or an 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 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,



Edward D. Ryan
Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

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

FOR LINE NUMBER
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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)
Sheet Metal Workers' International Association Political Action League

Full Name, Mailing Address, and ZIP Code

SMWIA LU#18-Philadelphia

1301 South Columbus Blvd.

Philadelphia PA 19147

Name of Employer

Date (month, day, year)

01/31/2001

Amount of Each Receipt this Period

2450.00

Occupation

Receipt For: Primary General

Other (specify):

Aggregate Year-to-Date \$ 2450.00

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SUBTOTALS of Receipts This Page (Optional)

TOTALS (this Period (last page this line number only)

2450.00

