



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

May 7, 1998

Daniel F. Wilton, Treasurer
Sheet Metal Workers International Association
Local 28 Political Action Committee
500 Greenwich Street
New York, NY 10013

Identification Number: C00169490

Reference: Year End Report (7/1/97-12/31/97)

Dear Mr. Wilton:

This letter is to inform you that as of May 6, 1998 the Commission has not received your response to our request for additional information, dated April 15, 1998. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Andrew Dodson on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,

A handwritten signature in cursive script that reads "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

APR 15 1998

Daniel F. Wilton, Treasurer
Sheet Metal Workers International Association
Local 28 Political Action Committee
500 Greenwich Street
New York, NY 10013

Identification Number: C00169490

Reference: Year End Report (7/1/97-12/31/97)

Dear Mr. Wilton:

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 D of your report, pertinent portion attached, indicates that the SMWIA Local 28 escrow account has incurred a debt to your committee, in the amount of \$48,065, and made a payment on that debt to your committee in the amount of \$48,065. Your report apparently discloses the receipt of this payment on Line 11(a)(ii) of the Detailed Summary Page. Please clarify whether this transaction represents a transfer from an account maintained by your committee for non-federal activity. If so, be advised that such a transfer is prohibited by 11 CFR §102.5(a)(1)(i) and the full amount of the transfer(s) should be returned to the non-federal account. Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on Schedule B supporting Line 22 of your next report.

If this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the impermissible funds or clarification of the transaction, will be taken into consideration.

-Schedule D of your report has failed to include certain information. Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and end of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report by providing the purpose of each debt. 11 CFR §104.11

-The amount of debts and obligations owed to your committee as reported on the Summary Page conflicts with the amount reported on the loan and/or debt schedule(s) (Schedule C and/or D). Please amend your report to clarify this discrepancy.

A written 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. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Andrew J. Dodson
Senior Reports Analyst
Reports Analysis Division

SCHEDULE D
 (Required 2007)

DEBTS AND OBLIGATIONS
Including Loans

Do not check this box if the filer is a partnership or an individual partner in a partnership.

Name of Creditor (or Payer)	Amount Owed at the End of the Period	Amount Paid During the Period	Amount Due at the End of the Period	Priority of the Debt
SMWIA Loc 28 - ADDRESS ABOVE CONT A. Full Name, Mailing Address and ZIP Code of Debtor or Creditor SMWIA Loc 28 ESCROW DEPT 500 Greenwich St New York NY 10014				
Nature of Debt (Purpose)				
B. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
C. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
D. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
E. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
F. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				

APD

1) SUBTOTALS This Period This Page (optional)	
2) TOTALS This Period (last page in this year only)	
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)	
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)	

**DETAILED SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**
PAGE 2, FIG FORM 28

[Include 1980]

NAME OF COMMITTEE		REPORT COVERED	PERIOD
INDIA Political Action Committee		11/1/79	12/31/79
I. Receipts			
1	Contributions (other than loans):		
a	Individuals/Persons Other Than Political Committees:		
1	Serialized (see Schedule B)	28,655.74	100,179.72
2	Unserialized	0.00	0.00
3	Total	28,655.74	100,179.72
b	Political Party Committees		
c	Other Political Committees (such as PACs)		
d	Total Contributions	28,655.74	100,179.72
2	Transfers From Affiliated/Other Party Committees		
3	Loans Received		
4	Loan Repayments Received		
5	Checks To Operating Expenditures (Refunds, Refunds, etc.)		
6	Refunds of Contributions Made to Federal Candidates and Other Political Committees	25,000.00	25,000.00
7	Other Receipts (Dividends, Interest, etc.)		
8	Transfers from Non-Federal Account for Joint Activity		
9	Total Receipts	73,655.74	125,179.72
10	Total Federal Receipts	73,655.74	125,179.72
II. Disbursements			
11	Operating Expenditures:		
a	Shared Federal/Non-Federal Activity (from Schedule IV):		
1	Federal Share		
2	Non-Federal Share		
b	Other Federal Operating Expenditures	19,378.00	27,423.00
c	Total Operating Expenditures	19,378.00	27,423.00
12	Transfers to Affiliated/Other Party Committees	75,000.00	75,000.00
13	Contributions to Federal Candidates/Committees and Other Political Committees		
14	Independent Expenditures (see Schedule B)		
15	Coordinated Expenditures Made by Party Committees (2 U.S.C. 4124(d)) (see Schedule B)		
16	Loan Repayments Made		
17	Loans Made		
18	Refunds of Contributions To:		
a	Individuals/Persons Other Than Political Committees		
b	Political Party Committees		
c	Other Political Committees (such as PACs)		
d	Total Contribution Refunds	25,000.00	25,000.00
19	Other Disbursements		
20	Total Disbursements	94,378.00	102,423.00
21	Total Federal Disbursements	94,378.00	102,423.00
III. Net Contributions/Operating Expenditures			
22	Total Contributions (other than loans) from Fig 11B	28,655.74	100,179.72
23	Total Contribution Refunds (from line 20d)		
24	Net Contributions (other than loans) (added line 22 from 23)	28,655.74	100,179.72
25	Total Federal Operating Expenditures	19,378.00	27,423.00
26	Checks to Operating Expenditures (from line 5)		
27	Net Committee Expenditures	19,378.00	27,423.00

