

**NOVARA  
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2003

By Counsel  
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David A. Priets, P.L.L.

August 5, 2003

**VIA UPS OVERNIGHT MAIL**

Federal Election Commission  
Attn: Maureen Benitz  
999 E. Street, NW  
Washington D.C. 20463

**Re: Great Lakes Political Action Committee, FEC Number: C00341636  
Michigan Regional Council of Carpenters Political Action Committee contribution**

Dear Ms. Benitz:

We are the attorneys for the Great Lakes Political Action Committee, and are in receipt of the FEC correspondence dated July 17, 2003, regarding a contribution in the amount of \$5,000 from the Michigan Regional Council of Carpenters Political Action Committee ("MRCC PAC"). The Great Lakes PAC was not made aware that the MRCC PAC was not registered with the FEC at the time it accepted the contribution and placed it into its federal funds account. Furthermore, our review of the regulations referenced in the July 17 letter does not indicate that the Great Lakes PAC's acceptance of the contribution was prohibited solely because the MRCC PAC was not registered with the FEC.

The MRCC PAC is a separate segregated fund that is funded through voluntary contributions by members of the Michigan Regional Council of Carpenters. These contributions are small in amount and would not exceed the individual contribution limits. Thus, none of the funds contained in the MRCC PAC could be traced back to a prohibited source, i.e. these funds are not corporate or union general treasury funds.

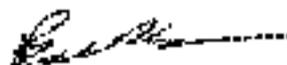
When we initially discussed this matter, you advised that transfer of the contribution to the Great Lakes PAC's state funds account would be sufficient to resolve the FEC's concerns regarding this contribution. Unfortunately, you have been out of the office since I received the July 17 letter stating that a refund of the contribution must be made. Moreover, other individuals in your office have stated that transfer of the funds is insufficient and a refund is required. Therefore, even though the Great Lakes PAC does not believe it received any prohibited funds, it will refund the full \$5,000 to the MRCC PAC in order to resolve this matter. The treasurer and assistant treasurer are not currently available to sign the refund check, but as soon as the check has been signed, I will forward a copy to you for your files.

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If you have any questions, please advise.

Very truly yours,

NOVARA, TESLJA & McGUIRE; P.L.L.C.



Brett Huebner

BH/mm

cc:

Joseph Michael  
Heather Dorn

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## Federal Election Commission

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