

**INTERNATIONAL  
LONGSHORE &  
WAREHOUSE UNION**  
AFL-CIO



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Vice President

WILLIAM E. ADAMS  
Secretary-Treasurer

April 23, 2013

Paul Stoetzer  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Elections Commission  
Washington, D.C. 20463

RECEIVED  
2013 MAY -6 AM 8:41  
FEC MAIL CENTER

IDENTIFICATION NUMBER: C00176214  
REFERENCE: AMENDED SEPTEMBER MONTHLY REPORT (08/01/2011-08/31/2011),  
RECEIVED 01/29/2013

Dear Mr. Stoetzer,

This responds to your letter dated February 22, 2013 regarding the amended monthly report referenced above. I have attached a copy of your letter for your convenience.

Your letter notes that this amended report discloses an increase in disbursements totaling \$11,240.50 on Lines 23 and 28(a). Your letter requests clarifying information as to why this activity was not disclosed on our initial report for this month.

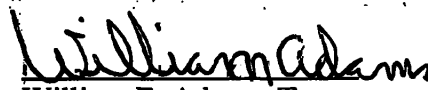
Late last year we discovered that an employee responsible for entering receipts and disbursements for the Political Action Fund had failed to perform his duties in accurate and timely fashion. Specifically, the additional disbursements disclosed in this amended report were not reported in the initial report because the terminated employee had failed to record these disbursements in the database from which we prepare our reports, as he had been instructed to do.

We terminated this employee and performed a thorough audit of this committee's transactions during his tenure, and promptly filed a number of amended reports, including the amended report referenced above. We have also taken steps to consolidate recordkeeping and reporting responsibilities so that this will not happen again.

We take very seriously our responsibility to fully and accurately disclose the transactions of the Political Action Fund. That is why we voluntarily filed this amended report, and why we have adjusted our procedures and personnel to ensure that we are able to do so.

Thank you for your letter asking for this clarification. If you have further questions or comments about this report, don't hesitate to contact me or my assistant Russ Bargmann, at the address or phone number listed above.

Sincerely,

  
William E. Adams, Treasurer  
ILWU Political Action Fund

13031064494



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

February 22, 2013

WILLIAM E. ADAMS, TREASURER  
INTERNATIONAL LONGSHORE AND WAREHOUSE  
UNION -- POLITICAL ACTION FUND  
1188 FRANKLIN STREET  
SAN FRANCISCO, CA 94109

**Response Due Date**  
**03/29/2013**

IDENTIFICATION NUMBER: C00176214

REFERENCE: AMENDED SEPTEMBER MONTHLY REPORT (08/01/2011 - 08/31/2011),  
RECEIVED 01/29/2013

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 1 item(s):

- Your amended report discloses an increase in disbursements totaling \$11,240.50 on Line(s) 23 and 28(a) of the Detailed Summary Page from those disclosed on your original report. Please provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)

**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) 694-1393.

1303106495

INTERNATIONAL LONGSHORE AND WAREHOUSE UNION -- POLITICAL ACTION  
FUND

Page 2 of 2

Sincerely,



Paul Stoetzer  
Senior Campaign Finance Analyst  
Reports Analysis Division

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13031064496

Federal Election Commission  
**ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS**  
The FEC added this page to the end of this filing to indicate how it was received.

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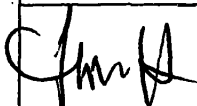
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5/6/13  
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