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NAME OF COMMITTEE (In Full)  
International Brotherhood of Electrical Workers Local 98 Committee  
on Political Education

FEC IDENTIFICATION NUMBER  
C00162818

Mailing Address 1719 Spring Garden Street

City State ZIP Code  
Philadelphia PA 19130-

December 4, 2018

Federal Election Commission  
Washington, DC 20463

Committee ID: C00162818  
Reference: RFAI dated 10/30/18 regarding the Amended July Quarterly Report 41/1-6/30/18, FEC-1244308)

To Whom It May Concern: In the interest of full disclosure, this letter is to serve as an explanation regarding the above-mentioned RFAI.

Item 1: The total reimbursements made by Local 98 IBEW COPE to Local 98 IBEW in the amount of \$6,425.43 were to properly reimburse the connected organization. These disbursements were made by employees of the connected organization who had made advance payments for federal fundraising expenses on credit cards issued by the connected organization, for which the connected organization pays off the credit card balance for all appropriate expenses, as well as postage used from the connected organizations postage machine, which is pre-paid by the connected organization. Accordingly, therefore, Local 98 IBEW COPE made these disbursements to the connected organization so that Local 98 IBEW COPE, not the connected organization, was paying for all federal fundraising activities. At no point were connected organization funds expended for federal fundraising activities. We recognize that this is contrary to Commission guidance but felt it was important to document the disbursements as they took place. We will amend the report to reflect the dates of the events in question. Internal controls have been put in place to ensure this error does not recur.

Item 2: We believe that this item is an error.  
-The 5/1/18 expenditure to Working America for \$70,310.00 was reported on 5/2/18, on FEC-1228587.  
-The 4/26/18 expenditure to Working American for \$72,000.00 was reported on 4/27/18, on FEC-1227909. (There was no second, identical expenditure.)  
-Further, there was no disbursement on March 27, 2018, to Jaworski Sign Company for \$3,320.00. The was a check made payable to KO Sporting Goods for that amount, and reported on 4/27/18, on FEC-1227909, once the \$10,000 threshold was reached.  
-The latter two disbursements were also erroneously reported on 4/30/18 on FEC-1228218 due to a software issue that has since been corrected.

Item 3: We believe this item is also in error. This disbursement of \$7,420.00 to Jaworski Sign Company was reported on both FEC-1227909 on 4/27/18 and FEC-1228128 on 4/30/18. It was erroneously reported twice due to a software issue that has since been corrected.

If you need any further information, please feel free to contact our office at (215) 563-5592 to speak to a member of our compliance team. Thank you.