

IAFF FIREPAC



Harold A. Scharfberger, General President
Vincent J. Bollon, General Secretary-Treasurer

February 25, 2002

Ms. Colleen Manning
Reports Analyst
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
FEC MAIL ROOM
2002 MAR -1 P 1:05

RE: Amended June Monthly Report (5/1/01 - 5/31/01)

FEC Identification Number: C00029447

Dear Ms. Manning:

In response to your letter dated January 30, 2002, we requested the Lucas for Congress committee to refund \$5,000 we contributed towards the special-primary election. You had deemed this an impermissible contribution.

The Lucas for Congress committee informed us that its reports analyst, Jill Sugarman, ruled that the contribution was permissible. Upon further research, we have found that the Code of Federal Regulations defines a primary election as "an election held by a State or political party, including a run-off election, or a nominating convention or caucus," (11 CFR 9032.7). Under this definition, a nominating convention is the legal equivalent of a primary election and our contribution was permissible.

Enclosed please find the correspondence referenced above from the Lucas for Congress committee. This should clear up any misunderstanding and confusion regarding this matter.

Should you have any questions or require further information, please do not hesitate to contact David Billy at the International Association of Fire Fighters, International Office at (202) 737-8484.

Sincerely,

Vincent J. Bollon
Treasurer

Enclosure

Lucas for Congress

#1-Eleanor Court South - Portsmouth, VA 23701
Telephone: (757) 405-3448
Fax: (757) 405-3478
Web Page: www.lucasforcongress.com

February 19, 2002

Mr. Vincent J. Bollon
Treasurer
IAFF FIREPAC
1750 New York Avenue, NW
Washington, DC 20006

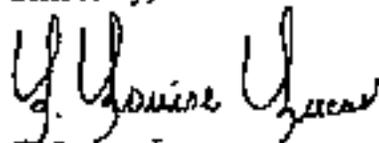
Dear Mr. Bollon,

We have received your request for a refund of your contribution. You stated this is because of an excess contribution being made per a letter from the FEC. We contact the FEC analyst for our campaign, Jill Sugarman. You will be happy to learn her response was that the Special Convention to choose the Democratic Party's Candidate is a separate election event from the Special Election. Therefore your contribution is not an excessive contribution. Your support of my campaign was greatly appreciated.

Again, I thank you for your kindness and generosity.

With best regards, I remain

Sincerely,


L. Louise Lucas

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

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