



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 14, 2009

RQ-2

William Lucy, Treasurer
American Federation of State County &
Municipal Employees - P E O P L E
1625 L Street NW
Washington, DC 20036

Response Due Date:
February 17, 2009

Identification Number: C00011114

Reference: 12-Day Pre General Report (10/1/08-10/15/08)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) 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 4 items:

1. Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B supporting Line(s) 21(b) of your report to clarify the following description(s): "Professional Services." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).
2. Your report discloses a loan from a lending institution; however, you have not submitted an electronic Schedule C-1, a paper C-1, or a copy of the loan agreement. As an electronic filer, you must submit the Schedule C-1 electronically without the original signature from the lending institution. In addition, you must mail a copy of the loan agreement and a separate copy of the Schedule C-1 that contains the original signature from the lending institution. Please submit the missing documents. (11 CFR §§104.3(d)(2) and 104.18(h))
3. Schedule E of your report indicates that your committee may have failed to file or timely file one or more of the required 48 hour notices for independent expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures

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aggregating \$10,000 or more with respect to a given election, made any time during the calendar year up to and including the 20th day before an election. The notice must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. 11 CFR §104.3(b)

4. Itemized independent expenditures must include a brief statement or description of why the expenditures were made. Please amend Schedule E of your report to clarify the following description(s): "Production Costs (OH)." For further guidance regarding acceptable purposes, please refer to 11 CFR §104.3(b)(3).

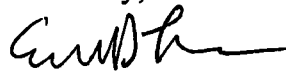
-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Other disbursements, such as contributions to non-federal organizations, should be properly disclosed on a separate Schedule B, supporting Line 29 of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing.

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) 694-1135.

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Sincerely,



Erinn D. Larkin
Campaign Finance Analyst
Reports Analysis Division

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AMERICAN FEDERATION OF STATE COUNTY & MUNICIPAL EMPLOYEES - P
E O P L E

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Missing 48-Hour Notice(s):

| Name of Payee | Date | Amount | Purpose | Candidate |
|--------------------|----------|----------------|-------------------------------|--------------|
| The Campaign Group | 10/14/08 | \$1,551,000.00 | Media Buy/Production Costs | McCain, John |
| The Campaign Group | 10/14/08 | \$730,000.00 | Media Buy/Production Costs | McCain, John |

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