



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

RQ-3

December 5, 2002

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

Identification Number: C00011114

Reference: July Monthly (6/1/02-6/30/02), August Monthly (7/1/02-7/31/02) and
September Monthly (8/1/02-8/31/02) Reports

Dear Mr. Lucy:

On November 13, 2002, you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

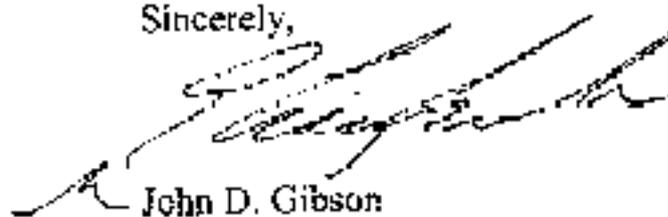
Your November 26, 2002 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-The Commission notes your response stating, "The AFSCME PEOPLE Committee is an affiliated committee of AFSCME. AFSCME pays most of the administration and solicitation costs of AFSCME PEOPLE. AFSCME PEOPLE maintains a separate non-federal account for the purpose of making direct expenditures, contributions to non-federal candidates, payment of certain limited PAC expenses and other non-federal payments." Please be advised that committees that make disbursements in connection with federal and non-federal elections and have established separate federal and non-federal accounts, must allocate their expenses pursuant to 11 CFR §§106.5 and 106.6. It appears from your response that your committee should be allocating due to disbursements made from the non-federal account for "payment of certain limited PAC expenses." The Commission recommends that you take steps to correct any non-compliance, and that you establish procedures to ensure future compliance with the allocation regulations.

An adequate response must be received at the Commission by December 25, 2002. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. 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.

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 related to this matter, please contact Antoinette Kitchen on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,



John D. Gibson
Assistant Staff Director
Reports Analysis Division