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Charles A. Brooke
Vice President
Government Relations

JUN -2 A 11:16

May 28, 2004

Ms. Andrea Needles, Sr. Campaign Finance Analyst
Reports Analysis Division
Federal Elections Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C00316331

Reference: April Quarterly Report (1/1/04-3/31/04)

Dear Ms. Needles:

I am writing in response to your letter of notification dated May 5, 2004. After reviewing our internal contributions records (see memo attached) I can confirm that our April Quarterly Report is correct and as you have pointed out, the IGT PAC has in fact exceeded the \$5,000 maximum allowable contribution to Senator Daschle's campaign committee for the 2004 Primary Election.

As a result of this mistake I have formally requested a refund from the Committee in the amount of \$3,000. (See copy of letter attached.) I sincerely appreciate you bringing this discrepancy to my attention. While there are no excuses for an error of this nature I do want to make you aware of the circumstances that contributed to it and also explain the steps we are taking to avoid it happening again.

As you are aware, I only became the official Treasurer of the IGT PAC on 2/18/04. My effort to understand how we failed to recognize that we would exceed the \$5,000 contribution limit with the contribution on 1/28/04 has been hampered by the fact that the Administrative staff person in our Government Relations Division who was in-charge of maintaining our contribution data base and checking it as part of her processing of PAC check requests, has since retired from our company and no longer lives in the area.

International Game Technology

Government Relations - IGT Las Vegas

1085 Palmes Airport Drive
Las Vegas, NV 89119-3749
www.igt.com

In an effort to improve the overall operation and accountability of our PAC we have contracted out our accounting and reporting to the Comerica PAC Service. In addition, Audrey Damonte, an Associate General Counsel here at IGT, has been assigned to assist me in maintaining our internal contribution database and reviewing all contribution requests. We recently sent her to Washington, DC to attend the FEC sponsored training session on Corporate PACs held on April 22, 2004.

I would again like to thank you for bringing this mistake to our attention and I would like to assure you we are making every effort possible to avoid a similar mistake in the future. I should also note that we are undertaking an internal review of the full history of all our PAC contributions over the past six years to satisfy ourselves that similar mistakes have not been made for other candidates.

If you have any further questions or if I can be of further assistance in any way, please feel free to call me directly at (702) 492-8880.

Sincerely,



Charles A. Brooke, Treasurer
International Game Technology (IGT) PAC

Attachments (2)

Cc: Audrey Damonte

Brooke.Chuck

From: Demente,Audrey
Sent: Wednesday, May 26, 2004 3:58 PM
To: Brooke.Chuck
Subject: Daschle Contributions

PRIVILEGED AND CONFIDENTIAL

I called to discuss the matter with you, but you were just going into a meeting. Our records reflect the following contributions:

3/21/2003 \$2,000 A Lot of People Supporting Tom Daschle Primary (check sent via fed-ex to Knute)

12/1/2003 \$1,000 A Lot of People Supporting Tom Daschle Primary (check given to CB)

1/28/2004 \$5,000 A Lot of People Supporting Tom Daschle Primary (check delivered by John Sears--Clinton/Mellencamp event)

Please call me when you have a minute.

Thanks,
AD



Charles A. Brooke
Vice President
Government Relations

May 28, 2004

Treasurer
A Lot of People Supporting Tom Daschle, Inc.
330 N. Dakota Avenue
Sioux Falls, SD 57104

Dear Sir:

By way of introduction I am the official registered Treasurer of the International Game Technology (IGT) Employee Political Action Committee. I was recently brought to my attention by the Federal Elections Commission, and confirmed by our own internal audit of our contribution records, that the IGT PAC has exceeded the \$5,000 contribution limit to your committee for the 2004 Primary Election by a total of \$3,000. (See attached list of our contributions.)

As we are past the 60-day limit for filing a redesignation for the \$3,000 I must request that your committee refund that amount directly to the IGT PAC. I apologize for the inconvenience and our failure to detect the mistake prior to the most recent contribution being made. While we look forward to supporting your committee in the General Election it is first necessary for me to reconcile the issue of our contribution overage for the Primary election and properly report that reconciliation to the FEC.

Your prompt attention to this matter is sincerely appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Brooke", written over a white background.

Charles A. Brooke, Treasurer
IGT PAC

Attachments (1)

Cc: Andrea Needles, FEC
Audrey Damonte, IGT

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International Game Technology (IGT) PAC

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Recipient Name	Date	Amount	Election	Report
A Lot of People Supporting Tom Daschle Inc.	3/21/2003	\$2,000	P 2004	2003 Mid Year Report
A Lot of People Supporting Tom Daschle Inc.	12/1/2003	\$1,000	P 2004	2003 Year End Report
A Lot of People Supporting Tom Daschle Inc.	1/29/2004	\$5,000	P 2004	2004 April Quarterly Report

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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<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input checked="" type="checkbox"/> Overnight Delivery Service (Specify): <i>Fedex</i>	Shipping Date <i>6-1-04</i>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
<i>J</i> PREPARER	<i>6-2-04</i> DATE PREPARED