

**INTERNATIONAL
LONGSHORE &
WAREHOUSE UNION**
AFL-CIO



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WILLIAM E. ADAMS
Secretary-Treasurer

April 23, 2013

Paul Stoetzer
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Elections Commission
Washington, D.C. 20463

RECEIVED
FEDERAL MAIL CENTER
APR 29 AM 8:31

IDENTIFICATION NUMBER: C00176214
REFERENCE: AMENDED SEPTEMBER MONTHLY REPORT (08/01/2012-08/31/2012),
RECEIVED 02/04/2013


Dear Mr. Stoetzer,

This responds to your letter dated February 27, 2013 regarding the amended monthly report referenced above. I have attached a copy of your letter for your convenience. Your letter raises two issues which I will address in turn.

1. You note that Schedule A supporting Line 11(a)(i) of this report discloses receipts from "Local 142 Fundraisers." These fundraisers collected contributions of substantially less than \$50 per person at a mass collection event, pursuant to 11 C.F.R. § 102.6(c)(5). We did not realize that we did not have to disclose the total amounts collected at these events on Schedule A. We will file an amended report, with these receipts omitted from Schedule A, and listing these receipts on line 11(a)(ii), because they did not include any contributions that aggregate greater than \$200 per year for any person.
2. You note that Schedule B supporting Line 28(b) of this report discloses a negative disbursement of funds to a candidate. You are correct that this entry was made to reflect a refund from this candidate. We mistakenly believed that this was the appropriate way to disclose this refund. We will file an amended report with this refund removed from Schedule B and line 28(b), and with this refund disclosed instead on Schedule A and on Line 16 of the report.

Thank you for alerting us to these issues with this amended report, and for clarifying the proper way to report these transactions. This process is helpful in our ongoing efforts to fully and accurately comply with our reporting obligations. If you have further questions or comments about this report, don't hesitate to contact me or my assistant Russ Bargmann, at the address or phone number listed above.

Sincerely,


William E. Adams, Treasurer
ILWU Political Action Fund



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

February 27, 2013

WILLIAM E. ADAMS, TREASURER
INTERNATIONAL LONGSHORE AND WAREHOUSE
UNION -- POLITICAL ACTION FUND
1188 FRANKLIN STREET
SAN FRANCISCO, CA 94109

Response Due Date
04/03/2013

IDENTIFICATION NUMBER: C00176214

REFERENCE: AMENDED SEPTEMBER MONTHLY REPORT (08/01/2012 - 08/31/2012),
RECEIVED 02/04/2013

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 2 item(s):

1. Schedule A supporting Line 11(a)(i) of your report discloses receipts identified as "Local 142, Fundraiser 2012 Oahu Division" and "Local 142, Fundraiser 2012 Hawaii Division." Please be advised that federal regulations require the itemization of all contributions from individuals/persons that aggregate greater than \$200 in the calendar year. Contributions from individuals/persons that aggregate \$200 or less need only be disclosed on Line 11(a)(ii) of the Detailed Summary Page.

Please clarify whether the receipts disclosed on Schedule A includes any contributions that aggregate greater than \$200 from an individual/person in the calendar year. If this is the case, please amend your report by itemizing the contributions from each individual/person on Schedule A. (11 CFR §104.3(a)(2))

2. Schedule B supporting Line 28(b) of your report discloses negative entries for the receipt of apparent refunds of contributions made during this or previous reporting periods. Please be advised that the receipt of refunds from federal candidate committees should be disclosed on Schedule A supporting Line 16 of the Detailed Summary Page if the committee wrote a refund check on its account. This method of reporting would clarify for the public record the total amount of receipts and more accurately disclose the cash-on-hand

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INTERNATIONAL LONGSHORE AND WAREHOUSE UNION -- POLITICAL ACTION
FUND

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amount. Please amend your report to properly disclose this activity or provide
clarifying information.

**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) 694-1393.

Sincerely,



Paul Stoetzer
Senior Campaign Finance Analyst
Reports Analysis Division

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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PREPARER

4/29/13
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