

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463 RQ-2

December 28, 2016

BRIAN BURROWS, TREASURER INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL 98 COMMITTEE ON POLITICAL EDUCATION 1719 SPRING GARDEN STREET PHILADELPHIA, PA 19130

Response Due Date 02/01/2017

IDENTIFICATION NUMBER: C00162818

REFERENCE: 12 DAY PRE-GENERAL REPORT (10/01/2016 - 10/19/2016)

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 $\underline{3}$ item(s):

1. The totals listed on Line(s) 24 and 29, Column B of the Detailed Summary Page(s) appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (52 U.S.C. §30104(b) (formerly 2 U.S.C. § 434(b)))

2. Schedule E of your report indicates that your committee may have failed to file one or more of the required 48 hour report(s) 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 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 report 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

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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))

3. Your committee has filed 24 & 48 hour reports for independent expenditures supporting Hillary Rodham Clinton (see attached) which have not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on the 24 & 48 hour reports must also be itemized on a corresponding Schedule E or MEMO Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend your report and any subsequent reports that may be affected by this correction. (11 CFR §104.4)

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.

<u>Electronic filers must file amendments (to include statements, designations and reports)</u> 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. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. 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) 694-1133.

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Sincerely,

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Christopher Morse Senior Campaign Finance Analyst Reports Analysis Division

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Missing 48 Hour Report (Schedule E)

International Brotherhood of Electrical Workers Local 98 Committee on Political Education (C00162818)

Name of Payee	Dissemination Date	Amount	Candidate
Aztec Signs & Graphics	10/5/16	\$775.00	Clinton, Hillary, Rodham
Clear Channel Outdoor	10/12/16	\$19,740.00	Clinton, Hillary, Rodham

Missing Schedule E (24/48 Hour Reports)

International Brotherhood of Electrical Workers Local 98 Committee on Political Education (C00162818)

Name of Payee	Dissemination Date	Amount	Candidate	Election		
Aztec Signs & Graphics	10/19/16	\$448.20	Clinton, Hillary, Rodham	*G2016		
Print and Sew, Inc.	10/19/16	\$27,470.00	Clinton, Hillary, Rodham	*G2016		
Aztec Signs & Graphics	10/19/16	\$448.20	Clinton, Hillary, Rodham	*G2016		
Print and Sew, Inc.	10/19/16	\$27,470.00	Clinton, Hillary, Rodham	*G2016		
Aztec Signs & Graphics	10/19/16	\$448.20	Clinton, Hillary, Rodham	*G2016		
Print and Sew, Inc.	10/19/16	\$27,470.00	Clinton, Hillary, Rodham	*G2016		
* These are disclosed on three separate 24/48 Hour Reports and may represent duplicate entries						