



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

David B. Drake, Treasurer  
International Shipholding Corp Political Action  
Committee  
650 Poydras Street, Suite 1700  
New Orleans, LA 70130

OCT 10 2001

Identification Number: C00327122

Reference: July Quarterly Report (4/1/00-6/30/00)

Dear Mr. Drake:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B discloses a contribution(s) towards the general election campaign of a Presidential candidate(s). Please note that contributions to Presidential candidates are governed by specific regulations. Please refer to the following explanation of Presidential election financing, and then amend your report to clarify this contribution(s).

All Presidential primary elections held during an election year are considered one election for the purpose of the contribution limits. A multi-candidate committee, therefore may give only \$5,000 to a Presidential candidate's primary campaign, regardless of how many separate state Presidential primaries the candidate participates in. 11 CFR §§110.1(j)(1) and 110.2(i)(1)

In the general election, contributions to Presidential campaigns are not permitted if the candidate receives public funds. (An exception: Political committees may contribute to a publicly funded Presidential nominee's "compliance fund." A compliance fund is used solely for legal and accounting expenses incurred in complying with the election law. Gifts to

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compliance funds are considered contributions and are subject to usual per-candidate, per-election limits.) 11 CFR §9003.3(a)

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a non-multicandidate political committee and its affiliates, from making a contribution to a candidate for federal office in excess of \$1,000 per election. Please refer to the Campaign Guide for information on how a committee qualifies for multicandidate status.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$1,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

If your committee has met the criteria for multicandidate status, please file FEC FORM 1M "Notification of Multicandidate Status" with the Commission. The treasurer must file FEC FORM 1M prior to making a contribution of more than \$1,000 per candidate per election. 11 CFR §102.2(a)(3)

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

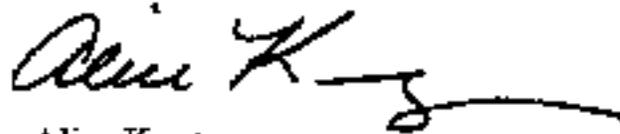
Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports

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Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in cursive script, appearing to read "Alice Kang", with a long horizontal flourish extending to the right.

Alice Kang  
Reports Analyst  
Reports Analysis Division

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**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

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FOR LINE NUMBER 23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

**NAME OF COMMITTEE (In Full)**

International Shipholding Corporation Political Action Committee

REC ID: C00372122

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Mary Landrau 503 Capitol Court, NE Suite 100 Washington, DC 20002	Fundraising Debt Retirement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Debt Retirement	04/03/00 05/03/00	1,000.00 1,000.00
The Jefferson Committee 650 Poydras St., Suite 2245 New Orleans, LA 70130	Fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	04/11/00	1,000.00
David Vitter for Congress 2520 Metairie Road Metairie, LA 70001	Fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	04/14/00	1,000.00
New Republican Majority Fund 1301 Pennsylvania Ave. NW Washington, DC 20004	General Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Leadership PAC	04/25/00	2,500.00
Cooksey for Congress P O Box 7600 Monroe, LA 71211	Fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	05/03/00	500.00
The Committee for the Preservation of Capitalism P O Box 22614 Alexandria, VA 22304	Fundraising Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Leadership PAC	05/03/00	2,500.00
Bush for President Jack Oliver, National Finance Director 301 Congress Ave., Suite 200 Austin, TX 78701	Fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	05/19/00	1,000.00
Stevens for Senate P O Box 1766 Washington, DC 20013	Fundraising Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	05/30/00	1,000.00
Bayou Leader PAC 1230 Dartmouth Road Alexandria, VA 22314	Fundraising Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Leadership PAC	06/12/00	1,000.00
<b>SUBTOTAL of Disbursements This Page (optional)</b>			12,500.00
<b>TOTAL This Period (last page this line number only)</b>			12,500.00

