



Local Union No. 98

INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS

1701 Spring Garden Street
Philadelphia, Pennsylvania 19130

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March 24, 2006

Federal Election Commission
999 E Street, NW
Washington, D.C. 20463
Attn: Ms. Maureen Benitz

Re: John Dougherty, Treasurer
IBEW Local 98, COPE
Year End Report
I.D. No.: C00162818

Dear Ms. Benitz,

The Committee on Political Education welcomes the opportunity to respond to your letter of February 24, 2006. The expenditures which have been questioned by the Commission are discussed seriatim:

1. Mr. John McClay. Operation of COPE'S phone bank for voter registration for State and local government candidates only.
2. Local 98 IBEW. Reimbursement for advances made for poll workers for State and local government candidates only.
3. Society Hill Beverages. Expense for beverages and refreshments for volunteer workers on phone bank for State and local government candidates only.
4. Mr. Edward Kelly. Payment of telephone bank workers' expenses for State and local government candidates only.
5. Petty Cash Expense. Food and beverages for volunteers on phone bank for State and local government candidates only.
6. Mr. Jeffery Marshall. Expenses for services incurred for technical support/computer connections for phone bank for State and local government candidates only.
7. Liberty Integrated Solutions. Payment for connection of telephone equipment for phone bank for State and local candidates only.

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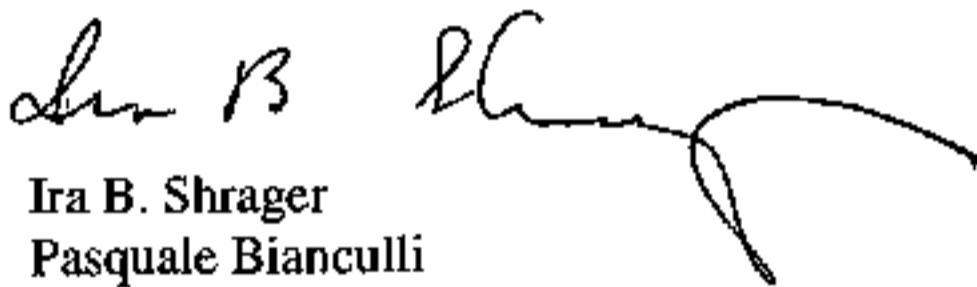
Ms. Maureen Benitz

March 24, 2006

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Concluding, all of the expenses referred to above were incurred for non-federal activity.

Very truly yours,



Ira B. Shrager
Pasquale Bianculli
Counsel
IBEW Local 98, COPE

cc: Mr. John J. Dougherty

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Federal Election Commission
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