



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 5, 2008

RQ-2

Vincent Bollon, Treasurer  
International Association of Firefighters Interested  
in Registration and Education PAC  
1750 New York Ave NW  
Washington, DC 20006

Response Due Date:  
December 8, 2008

Identification Number: C00029447

Reference: September Monthly Report (8/1/08-8/31/08)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) 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 3 items:

1. Schedule D of your report discloses a debt of \$4,494.36 owed to your connected organization for "Web Site Maintenance." Memo Schedule E of your report discloses a total of \$4,494.36 in Independent Expenditures were publicly distributed or disseminated by your apparent connected organization for "Web Site Maintenance," in support of Barack Obama. Please provide clarifying information regarding the apparent activity conducted by your connected organization and subsequently paid by your committee.
- 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund. Further, 11 CFR §114.2(f) prohibits corporations and labor organizations from facilitating the making of contributions to candidates or political committees, other than to the separate segregated funds of the corporations and labor organizations. Facilitation means using corporate or labor organization resources or facilities to engage in fundraising activities in connection with any federal election. The use of corporate or labor organization resources in connection with a fundraiser may be permissible for certain fundraising

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activities only if the corporation or labor organization receives **advance** payment for the fair market value of such services. 11 CFR §114.2(f)(2)(i)(A), (C) and (E) In addition, services provided by employees and rendered to federal candidates must be paid in advance, and prior to compensating the employees for such services (See Advisory Opinion 1984-37).

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

2. Schedule A of your report discloses in-kind contributions to your committee. Please be advised that the value of in-kind contributions must be added to the receipts and disbursements total in order to avoid either inflating or deflating the cash on hand amount, and itemized on the appropriate Schedules A and B. 11 CFR § 104.13(a)(2) Please amend your report by itemizing the in-kind contributions on Schedule B.

3. Schedule E of your report indicates that your committee may have failed to file one or more of the required 48 hour notices 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 20<sup>th</sup> day before an election. The notice 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 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)

**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.**

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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) 694-1139.

Sincerely,

*Nicole Della Rocco*

Nicole Della Rocco  
Campaign Finance Analyst  
Reports Analysis Division

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Name of Payee	Date	Amount	Purpose	Candidate
Financial Innovations	8/16/2008	\$295.92	Rally Signs	Obama, Barack
Financial Innovations	8/18/2008	\$476.74	Rally Signs	Obama, Barack
Financial Innovations	8/18/2008	\$177.63	Rally Signs	Obama, Barack
Financial Innovations	8/23/2008	\$603.96	Rally Signs	Obama, Barack
Sun Mountain Media Services, LLC	8/27/2008	\$35,400.00	Video Production	Obama, Barack

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