

ETEXT ATTACHMENT

01/11/2005 11 : 15

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Ms. Abbie Hodgson, Analyst
Reports Analysis Division
Federal Election Commission

Dear Ms. Hodgson,

On behalf of the International Longshoremen s Association Committee on Political Education (ILA COPE), we hereby file this Form 99 Miscellaneous report in response to your letters seeking additional information regarding the amended October 2004 Quarterly and 12-day Pre-Primary 2004 reports. With respect to the additional receipts reported, the additional receipts shown on the amended reports represent unitemized payroll deduction contributions from ILA members. These unitemized receipts were not reflected in the original report because of a routing delay in the transmission of certain account information from ILA s accountants to the persons responsible for preparing ILA COPE reports. ILA COPE has already acted to address and resolve the source of the routing delay that necessitated the amendments by providing for the direct transmission of ILA COPE receipt information from ILA COPE s bank to the persons responsible for preparing ILA COPE s FEC reports. This step represents a part of on-going efforts by the ILA to streamline the transmission of information between relevant ILA departments, which effort has been made a priority since the completion of the FEC s audit of ILA COPE in 2004. We note that the amount of the additional unitemized payroll deduction receipts in question represent a relatively small percentage of ILA COPE s total annual receipts. With regard to the apparently excessive contributions, these contributions were incorrectly reported as having been made for the primary election when, in fact, they were made for the general election. We are amending the appropriate reports to reflect the proper election. Again, this is a problem that should not occur again as we have greatly improved our report preparation processes since the filing of the original reports and since the completion 2004 audit of ILA COPE. With respect to the T-Shirts, these were T-shirts given to members of ILA only and did not constitute public communications, and, as such, are not considered independent expenditures. We also did not feel it appropriate to file a Form 7 report because those reports apply only to corporations and labor organizations, while the disbursements for the members' T-shirts were made by the PAC (ILA COPE). The event expenses for which you seek clarification were related to an ILA members-only event and covered costs of refreshments and other expenses associated with the event. We will amend our reports to clarify this information. However, please do not hesitate to contact me at (203) 254-3233 if you believe this response to be insufficient, if you require additional information, or if you should have any additional questions.

Sincerely,

Corey Rubin
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