



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Charles A. Gueli, Treasurer  
Italian American Democratic  
Leadership Council  
1101 Vermont Avenue, NW, Suite 1001  
Washington, DC 20005

FEB 28 2001

Identification Number: C00299396

Reference: 30 Day Post-General Report (10/19/00-11/27/00)

Dear Mr. Gueli:

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 A 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(f) and 11 CFR §110.1(d) preclude a committee and its affiliates from receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or

receiving a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-The total listed on Line 11(d), Column B of the Detailed Summary Page appears to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B total. Please amend your report and any subsequent reports that may be affected by this correction.

-Your calculations for Line 6(d), Column B appear to be incorrect. FEC calculations disclose this amount(s) to be \$72,027.62. Please provide the corrected total(s) on the Summary Page.

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule H4 or B, supporting Lines 21(a) or 21(b), respectively of the Detailed Summary Page. 2 U.S.C. §434(b)(5) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind

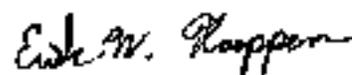
contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

-On future reports, please disclose your cash-on-hand calendar year-to-date total in the box provided on Line 6(a) of the Summary Page.

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

Sincerely,



Erik W. Koeppe  
Reports Analyst  
Reports Analysis Division

**SCHEDULE A**

**ITEMIZED RECEIPTS**  
**Other Political Committees**

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): **Italian American Democratic Leadership Council**

000299396

A. Full Name, Mailing Address and ZIP Code Sheet Metal Workers Intl Assn Political Action League 1750 17 Ave, NW WDC 20006	Name of Employer Occupation Aggregate Year-to-Date > \$ 10,000 -	Date (month, day, year) 10/23/00	Amount of Each Receipt this Period \$ 3000. -
B. Full Name, Mailing Address and ZIP Code Transportation Trades Dept AFL-CIO 1025 Ann Ave, NW WDC 20006	Name of Employer Occupation Aggregate Year-to-Date > \$ 6	Date (month, day, year) 11/2/00	Amount of Each Receipt this Period 250. -
C. Full Name, Mailing Address and ZIP Code Drive Political Fund 25 Louisiana Ave, NW WDC 20001	Name of Employer Occupation Aggregate Year-to-Date > \$ 8	Date (month, day, year) 11/10/00	Amount of Each Receipt this Period 1000. -
D. Full Name, Mailing Address and ZIP Code Fazo For Congress 555 Capitol Mall #142 Sacramento, CA 95814	Name of Employer Occupation Aggregate Year-to-Date > \$ 1000	Date (month, day, year) 11/22/00	Amount of Each Receipt this Period 1000. -
E. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date > \$ 8	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date > \$ 8	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional) .....

TOTAL This Period (last page this line number only) .....

\$ 5250. -

SCHEDULE A

ITEMIZED RECEIPTS

Other Political Committees

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NAME OF COMMITTEE (in Full) Italian American Democratic Leadership Council 000299396

*EWK*

A. Full Name, Mailing Address and ZIP Code  
 Sheet Metal Workers Intl Assn  
 1750 New York Ave NW  
 WDC 20006

Name of Employer: \_\_\_\_\_  
 Date (month, day, year): 8/11/00  
 Amount of Each Receipt this Period: \$ 500.00

Occupation: \_\_\_\_\_  
 Aggregate Year-to-Date: \$ 500.00

Receipt For:  Primary  General  
 Other (specify): \_\_\_\_\_

B. Full Name, Mailing Address and ZIP Code  
 New Jersey State Laborers PAC  
 104 Interchange Plaza, Ste 301  
 Cranbury, NJ 08512

Name of Employer: \_\_\_\_\_  
 Date (month, day, year): 8/11/00  
 Amount of Each Receipt this Period: \$ 250.00

Occupation: \_\_\_\_\_  
 Aggregate Year-to-Date: \$ 750.00

Receipt For:  Primary  General  
 Other (specify): \_\_\_\_\_

C. Full Name, Mailing Address and ZIP Code

Name of Employer: \_\_\_\_\_  
 Date (month, day, year): \_\_\_\_\_  
 Amount of Each Receipt this Period: \_\_\_\_\_

Occupation: \_\_\_\_\_  
 Aggregate Year-to-Date: \$ \_\_\_\_\_

Receipt For:  Primary  General  
 Other (specify): \_\_\_\_\_

D. Full Name, Mailing Address and ZIP Code

Name of Employer: \_\_\_\_\_  
 Date (month, day, year): \_\_\_\_\_  
 Amount of Each Receipt this Period: \_\_\_\_\_

Occupation: \_\_\_\_\_  
 Aggregate Year-to-Date: \$ \_\_\_\_\_

Receipt For:  Primary  General  
 Other (specify): \_\_\_\_\_

E. Full Name, Mailing Address and ZIP Code

Name of Employer: \_\_\_\_\_  
 Date (month, day, year): \_\_\_\_\_  
 Amount of Each Receipt this Period: \_\_\_\_\_

Occupation: \_\_\_\_\_  
 Aggregate Year-to-Date: \$ \_\_\_\_\_

Receipt For:  Primary  General  
 Other (specify): \_\_\_\_\_

F. Full Name, Mailing Address and ZIP Code

Name of Employer: \_\_\_\_\_  
 Date (month, day, year): \_\_\_\_\_  
 Amount of Each Receipt this Period: \_\_\_\_\_

Occupation: \_\_\_\_\_  
 Aggregate Year-to-Date: \$ \_\_\_\_\_

Receipt For:  Primary  General  
 Other (specify): \_\_\_\_\_

G. Full Name, Mailing Address and ZIP Code

Name of Employer: \_\_\_\_\_  
 Date (month, day, year): \_\_\_\_\_  
 Amount of Each Receipt this Period: \_\_\_\_\_

Occupation: \_\_\_\_\_  
 Aggregate Year-to-Date: \$ \_\_\_\_\_

Receipt For:  Primary  General  
 Other (specify): \_\_\_\_\_

SUBTOTAL of Receipts This Page (optional) \$ 750.00

TOTAL This Period (last page this line number only) \$ 750.00

**SCHEDULE A**

**ITEMIZED RECEIPTS**  
Other Political Committees

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

PAGE 1 OF 2  
FOR LINE NUMBER 11C

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NAME OF COMMITTEE (In Full) **Italian American Democratic Leadership Council**

000299396

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
American Maritime Officers' Political Action Fund 650 4th Ave. Brooklyn, NY 11234	—	5/17/00	500 <sup>-</sup>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 500	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
ALPA - PAC 1625 Mass Ave. NW Washington, DC 20036	—	5/17/00	1000 <sup>-</sup>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1000	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Transportation Trades Dept. AFCCIO PAC 1025 Connecticut Ave NW Washington, DC 20036	—	5/17/00	1000 <sup>-</sup>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1000	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Sheet Metal Workers' Political Action League 1750 NY Ave. NW Washington, DC 20006	—	5/17/00	2000 <sup>-</sup>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 2000	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
AFSCME 1625 L St, NW Washington, DC 20036	—	5/25/00	1000 <sup>-</sup>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1000	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Motion Picture Assn. of America 1600 I St, NW Washington, DC 20006	—	5/25/00	500 <sup>-</sup>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 500	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
United Association 901 Mass. Ave. NW Washington, DC 20001	—	5/25/00	1000 <sup>-</sup>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1000	

EWK

7000<sup>-</sup>

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

