

FEDERAL
ELECTION COMMISSION
OPERATIONS CENTER

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Anthony N. Mallace, CPA, J.D.
109 West Merchant Street
Audubon, NJ 08106
Tel. (856) 546-1800
Fax (856) 546-0142
e-mail: atty_cpa@netzero.com
www.mallace.com

November 5, 2004

Federal Election Commission
999 E Street, N.W.
Washington DC 20465
Attn: Jennifer Thangavelu

RE: National Italian American Political Action Committee
Identification Number : C00355388
April Quarterly Report (01/01/04 to 03/31/2004)

Sent By Express Mail Article # ET735333360US

Dear Ms. Thangavelu:

This letter is in response to your inquiry regarding the above referenced report.

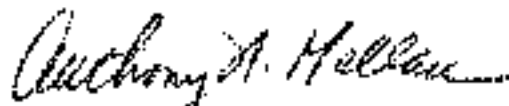
Our report reflected no payments classified as administrative expenses because the Committee has no staff of any kind to whom we pay a salary for telephone, office or other like services. Likewise, there are no organizations or individuals who provide such services.

However, there is a fundraiser, UTA Associates, that the Committee employs for the primary purpose of receiving and processing contributions on behalf of the Committee. This fundraiser also provides telephone answering service for the Committee. These payments are included among the total operating expenses reported on line 21(b) of the report.

If there is a different classification that should be used to code these expenditures, kindly so advise. Upon your recommendation, I will make any corrective action, including, if necessary, the filing of an amended report in order to reclassify such payments.

If I can provide any further information, please contact me.

Very truly yours,



Anthony N. Mallace, CPA, J.D.

cc: Mr. Joseph Turantino
Mr. Joseph Auteri



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 6, 2004

RQ-2

Anthony N. Mallace, CPA, J.D., Treasurer
National Italian American Political Action
Committee
1205 Locust Street, Suite 100
Philadelphia, PA 19107

Response Due Date:
November 5, 2004

Identification Number: C09353388

Reference: April Quarterly Report (1/01/04-3/31/04)

Dear Mr. Mallace:

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. An adequate response must be received at the Commission by the response date noted above. An itemization of the information needed follows:

-Your report discloses no 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(s) B supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) 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 volunteers have provided these services, please confirm this in writing.

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. 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.

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) 694-1143.

Sincerely,


Jennifer Thangavelu
Campaign Finance Analyst
Reports Analysis Division

Federal Election Commission
**ENVELOPE REPLACEMENT PAGE
 FOR INCOMING DOCUMENTS**

The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
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<input checked="" type="checkbox"/> USPS Express Mail	Postmarked 11-5-04
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
<i>[Signature]</i> PREPARER	11-8-04 DATE PREPARED