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2001 FEB -9 P 2:03

Vincent Panettieri, C.P.A.
Steven Kaye, C.P.A.
Carol Westfall, C.P.A.
Vincent F. Panettieri, C.P.A.

February 2, 2001

Ms. Alice Kang, Report Analyst
Federal Election Commission
999 East Street, NW
Washington, DC 20463

Re: I.U.O.E. Local 15 PAC ID# COO183956 July 1, 2000-September 30, 2000

Dear Ms. Kang:

This is in response to your January 23, 2001 letter to Mr. Shaw of the I.U.O.E. Local 15 Political Action Committee.

1. Enclosed is a copy of the PAC's January 29, 2001 request for reimbursement from the candidate in question.
2. We have corrected the report to indicate that the September 15, 2000 disbursement was for general election purposes. The event took place October 3, 2000.
3. We have amended the September report to correct year-to-date figures and apologize for the error.
4. We have added the House or Senate declarations along with the state involved.

We hope this responds in full to all of your questions. If you have any further questions, we will, of course, be happy to respond.

Sincerely,

Carol Westfall

CW/bv
Enc.



20- Jan 2000

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Robert G. Shaw, Treasurer
International Union of Operating Engineers
Local 15 Political Action Committee
265 West 14th Street
New York, NY 10011

JAN 23 2001

Identification Number: C00163956

Reference: October Quarterly Report (7/1/00-9/30/00)

Dear Mr. Shaw:

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 B 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(a) precludes a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

INTERNATIONAL UNION OF OPERATING ENGINEERS LOCAL 15 POLITICAL
ACTION COMMITTEE

PAGE 2

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

✓ -Schedule B supporting Line 23 of your report discloses a contribution(s) to a candidate(s) for the primary election; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an impermissible contribution, you should notify the recipient and request a refund and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

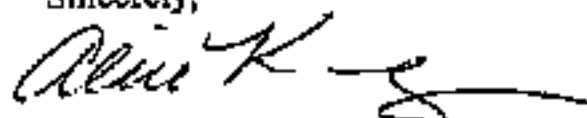
✓ -The totals listed on Lines 23 and 29, Column B of the Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

✓ -Please amend Schedule B supporting Line 23 by providing the office sought (House or Senate) and state for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

INTERNATIONAL UNION OF OPERATING ENGINEERS LOCAL 15 POLITICAL
ACTION COMMITTEE
PAGE 3

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,



Alice Kang
Reports Analyst
Reports Analysis Division



International Union of Operating Engineers

LOCAL UNIONS No. 15, 15-A, 15-B, 15-C & 15-D
POLITICAL ACTION COMMITTEE

266 WEST 14th STREET NEW YORK, NY 10011

Tel. WAlking 9-5327
5329
5329

January 30, 2001

Ms. Alice Kang
Reports Analyst
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Kang:

Thank you for your recent letter regarding the excess contributions by this Local Union's Political Action Committee Fund to the Lazio 2000 Campaign.

Please be advised that we have written a letter of explanation to the Lazio Campaign (copy enclosed) and hope to receive a response from them within the timeframe requested.

If you have any questions, please feel free to contact me at (212) 929-5327.

Very truly yours,

Robert G. Shaw
Treasurer

RG5/kaos

cc: Brady, McGuire and Steinberg, PC

Enclosure



International Union of Operating Engineers

LOCAL UNIONS No. 15, 15-A, 15-B, 15-C & 15-D
POLITICAL ACTION COMMITTEE

266 WEST 14th STREET * NEW YORK, NY 10011

Tel. WALKers 9-5327
5328
5328

January 29, 2001

Lazio 2000
P.O. Box 5063
Bayshore, NY 11706

To Whom It May Concern:

According to the recent letter we received from the Federal Election Commission in Washington, Local 15 has exceeded the \$5,000.00 maximum contribution to the Lazio 2000 Campaign by \$1,800.00.

Therefore we are requesting the sum of \$1,800.00 be returned to us to avoid any violations or penalties that may incur.

Thank you for your immediate attention regarding this matter. If you have any questions, please feel free to contact me directly.

Sincerely,

A handwritten signature in cursive script that reads "Robert G. Shaw".

Robert G. Shaw
Treasurer

RGS/kaos

cc: Alice Kang, FEC
Brady, McGuire and Steinberg, PC

Enclosure

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEC MAIL ROOM
2001 FEB -9 P 2:03

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) International Union of Operating Engineers Local 15 Political Action Committee		2. FEC IDENTIFICATION NUMBER C00163956
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 265 West 14th Street		
CITY, STATE and ZIP CODE New York, NY 10011		
3. <input type="checkbox"/> This committee has qualified as a multicandidate committee. (see FEC FORM 1M)		

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Termination Report
- Monthly Report Due On:
 February 20 June 20 October 20
 March 20 July 20 November 20
 April 20 August 20 December 20
 May 20 September 20 January 31
- 12-Day Pre-Election Report for the _____
(Type of Election)
election on _____ in the State of _____
- 30-Day Post-Election Report following the General Election
on _____ in the State of _____
- (b) Is this Report an Amendment? YES NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>7-1-00</u> through <u>9-30-00</u>		
6. (a) Cash on Hand January 1, 19 2000		\$ 213,335.03
(b) Cash on Hand at Beginning of Reporting Period	\$ 222,108.43	
(c) Total Receipts (from Line 19)	\$ 62,364.51	\$ 100,589.35
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 284,472.94	\$ 313,924.38
7. Total Disbursements (from Line 30)	\$ 8,792.12	\$ 38,243.56
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 275,680.82	\$ 275,680.82
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ None	For further information contact: Federal Election Commission 899 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-694-1100
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ None	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Robert G. Shaw	Date 2-2-2001
Signature of Treasurer <i>Robert G. Shaw</i>	

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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DETAILED SUMMARY PA

OF RECEIPTS AND DISBURSEMENT

PAGE 2, FEC FORM 3X

(revised 1/1/91)

NAME OF COMMITTEE International Union of Operating Engineers Local 15 Political Action Committee	REPORT COVERING PERIOD FROM 7-1-00 TO 9-30-00	
I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year
11. Contributions (other than loans) From:		
a. Individual/Persons Other Than Political Committees		
i. Itemized (use Schedule A)	61,435.90	96,442.18
ii. Unitemized		
iii. Total (add i and ii) >	61,435.90	96,442.18
b. Political Party Committees		
c. Other Political Committees (such as PACs)		
d. Total Contributions (add a, b, and c) >	61,435.90	96,442.18
12. Transfers From Affiliated/Other Party Committees		
13. All Loans Received		
14. Loan Repayments Received		
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)		
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees		
17. Other Federal Receipts (Dividends, Interest, etc.)	928.61	4,147.17
18. Transfers from Nonfederal Account for Joint Activity		
19. Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18) >	62,364.51	100,589.35
20. Total Federal Receipts (subtract line 18 from line 19) >	62,364.51	100,589.35
II. Disbursements		
21. Operating Expenditures:		
a. Shared Federal/Non-Federal Activity (from Schedule H4)		
i. Federal Share		
ii. Non-Federal Share		
b. Other Federal Operating Expenditures		
c. Total Operating Expenditures (add a, i, and b) >		
22. Transfers to Affiliated/Other Party Committees		
23. Contributions to Federal Candidates/Committees and Other Political Committees	7,000.00	23,175.00
24. Independent Expenditures (use Schedule E)		
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F)		
26. Loan Repayments Made		
27. Loans Made		
28. Refunds of Contributions To:		
a. Individuals/Persons Other Than Political Committees		
b. Political Party Committees		
c. Other Political Committees (such as PACs)		
d. Total Contribution Refunds (add a, b and c) >		
29. Other Disbursements	1,792.12	15,068.56
30. Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >	8,792.12	38,243.56
31. Total Federal Disbursements (subtract line 21 a ii from line 30) >	8,792.12	38,243.56
III. Net Contributions/Operating Expenditures		
32. Total Contributions (other than loans) (from line 11d)	61,435.90	96,442.18
33. Total Contribution Refunds (from line 28d)		
34. Net Contributions (other than loans) (subtract line 33 from 32)	61,435.90	96,442.18
35. Total Federal Operating Expenditures (add 21 a i and 21 b) >		
36. Offsets to Operating Expenditures (from line 15)		
37. Net Operating Expenditures (subtract line 36 from 35) >		

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE **1** OF **1**
FOR LINE NUMBER **23**

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)

International Union of Operating Engineers Local 15 Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Sue Kelly for Congress P.O. Box 16021 Alexandria, VA 22302	R 19th - HOUSE - NY Voluntary Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	09-26-00	1,000.00
Lazio 2000 c/o Robert Carlino LI Contractors Association Farmingdale, New York 11735	SENATE - NY Voluntary Contribution Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07-12-00	700.00
Lazio 2000 c/o Robert Carlino LI Contractors Association Farmingdale, New York 11735	SENATE - NY Voluntary Contribution Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07-12-00	1,800.00
Engel for Congress 18 East 16th Street Suite 401 New York, New York 10003	D-17th - HOUSE - NY Voluntary Contribution Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	09-07-00	500.00
Friends of Major R Owens P.O. Box 2265 Brooklyn, New York 11202-2265	D-11th - HOUSE - NY Voluntary Contribution Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	09-07-00	500.00
Pete King for Congress 486 78th Street Brooklyn, New York 11209	R-3rd - HOUSE - NY Voluntary Contribution Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	09-07-00	500.00
CMTE Re-Elect NYDIA Velazquez 436 New Jersey Ave. Washington, DC 20003	D-12th - HOUSE - NY Voluntary Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	09-15-00	500.00
National Audubon Society 200 Trillium Lane Albany, New York 12203	D-18th - HOUSE - NY Voluntary Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	09-19-00	1,500.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) **7,000.00**

TOTAL This Period (last page this line number only) **7,000.00**

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

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) International Union of Operating Engineers Local 15
Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A.G. Edwards Trust Co. 2 North Jefferson St. Louis, MO 63166-9884	Bank Fee Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify)	8-29-00	37.39
B. Full Name, Mailing Address and ZIP Code Schultheis & Panettieri 210 Marcus Boulevard Hauppauge, New York 11788-3701	Accounting Fees Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify)	7-07-00	1,000.00
C. Full Name, Mailing Address and ZIP Code George Drapeau Company P.O. Box 144 Armonk, New York 10504	Printing Materials Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify)	7-07-00	754.73
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) 1,792.12

TOTAL This Period (last page this line number only) 1,792.12

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

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

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> First Class Mail	POSTMARKED 2-5-01
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED (R/C)
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>Jet</i> PREPARER	2-9-01 DATE PREPARED