



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

October 30, 2018

BRIAN BURROWS, TREASURER
INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS LOCAL 98
COMMITTEE ON POLITICAL EDUCATION
1719 SPRING GARDEN STREET
PHILADELPHIA, PA 19130

Response Due Date
12/04/2018

IDENTIFICATION NUMBER: C00162818

REFERENCE: JULY QUARTERLY REPORT (04/01/2018 - 06/30/2018)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 enforcement action.** Additional information is needed for the following 3 item(s):

1. Schedule B of your report discloses a total of \$6,425.43 in payments to your connected organization for "Reimb for fundraiser for Rich Lazer," "Reimb for in-kind contrib: fundraiser for Madeleine Dean for Congress," and "Reimb for in-kind contrib: postage for fundraiser invites for Madeleine Dean for Congress." Please be advised that 52 U.S.C. §30118 (formerly 2 U.S.C. §441b) prohibits a corporation or labor organization from contributing 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 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))

Please amend your report to clarify whether the payment to your connected organization was intended to influence federal elections and provide the dates of the activity conducted by your connected organization. In addition, please clarify

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whether your committee made advance payment for these services to your connected organization. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

2. Your committee has filed 24 and 48 hour reports for independent expenditures supporting Rich Lazer (see attached) which have not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on 24 and 48 hour reports must also be itemized on a corresponding Schedule E or MEMO Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend your report and any subsequent reports that may be affected by this correction. (11 CFR §104.4)

3. Schedule E of your report indicates that your committee may have failed to timely file one or more of the required 48 hour report(s) 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 20th day before an election. The report 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. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. 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) 694-1157.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Chamorro', with a horizontal line extending to the left and a vertical line extending upwards from the middle.

Andrea Chamorro
Campaign Finance Analyst
Reports Analysis Division

Missing Schedule E (24 Hour Report)**International Brotherhood of Electrical Workers Local 98 Committee on Political Education
(C00162818)**

Name of Payee	Dissemination Date	Amount	Candidate	Election
America, Working	5/1/18	\$70,310.00	Lazer, Rich	P2018

Missing Schedule E (48 Hour Report)**International Brotherhood of Electrical Workers Local 98 Committee on Political Education
(C00162818)**

Name of Payee	Dissemination Date	Amount	Candidate	Election
Jaworski Sign Company	3/27/18	\$3,320.00	Lazer, Rich	P2018
America, Working	4/26/18	\$72,000.00	Lazer, Rich	P2018
America, Working	4/26/18	\$72,000.00	Lazer, Rich	P2018

Late 48 Hour Report (Schedule E)**International Brotherhood of Electrical Workers Local 98 Committee on Political Education
(C00162818)**

Name of Payee	Dissemination Date	Amount	Candidate	Election	Report Received
Jaworski Sign Company	4/25/18	\$7,420.00	Lazer, Rich	P2018	4/30/18