

# Pennsylvania Credit Union League & Pacul Services, Inc.



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UNITED STATES  
FEDERAL  
OPERATIONS CENTER

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November 25, 2002

Ms. Maureen Benitz  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 R Street, NW  
Washington, D.C. 20463

**RE: IDENTIFICATION NUMBER C00109397**

Dear Ms. Benitz:

This is in response to your letters to Georgeann Lawson, Treasurer, inquiring about items contained in the Pennsylvania Credit Union League Legislative Action Committee's filings with the Federal Election Commission. We apologize for the delay in this response.

We would first like to address the letter referencing the following reports: Amended 12 Day Special Election (1/1/01-4/25/01), dated 6/13/01, 30 Day Special Election (4/26/01-6/4/01), Mid-Year Report (6/5/01-6/30/01), April Quarterly (1/1/02-3/31/02), 12 Day Pre-Primary (4/1/02-5/1/02), July Quarterly (5/2/02-6/30/02).

The highlighted items that are referenced as "Members of" a particular credit union are not in violation of 2 U.S.C. § 441 (b). They are voluntary donations made by the individual members of a credit union and are in no way corporate contributions.

The credit unions referenced are members of our trade association, the Pennsylvania Credit Union League and are acting in the form of a collecting agent. The fundraisers highlighted are voluntary donations of \$2 for a Hershey Bar or \$10 for a Pennsylvania Credit Union League Cookbook. A few represent "Dress Down Days" where credit union staff pledge a small amount such as \$5 and receive the right to dress down on a specific day and a few others represent silent auctions where small items and baked goods were auctioned off. None of the amounts reported reflect aggregate contributions over \$50. As these contributions represent aggregate contributions under \$50, we have not reported individuals by name and address, in keeping with the applicable Federal laws and regulations.