



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

February 27, 2003

Dan Cohen, Treasurer
Association of Trial Lawyers of America
Political Action Committee
1050 31st Street N.W.
Washington, DC 20007

Identification Number: C00024521

Reference: 12 Day Pre-General Report (10/1/02-10/16/02)

Dear Mr. Cohen:

This letter is to inform you that as of February 26, 2003 the Commission has not received your response to our request for additional information, dated February 5, 2003. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

An adequate response must be received at the Commission by March 19, 2003. 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 have any questions regarding this matter, please contact Erik Koeppen on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division), our local number is (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Dan Cohen, Treasurer
Association of Trial Lawyers of America
Political Action Committee
1050 31st Street N.W.
Washington, DC 20007

FEB 05 2003

Identification Number: C00024521

Reference: 12 Day Pre-General Report (10/1/02-10/15/02)

Dear Mr. Cohen:

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 C of your report discloses an outstanding loan from a lending institution with an interest rate of 6%. However, your report does not disclose any interest payments or carry the interest due on this loan as a debt. Please note that outstanding accrued interest on loans must be reported on Schedule D, while interest payments made on loans must be reported as operating expenditures on Schedule B supporting Line 21(b) of the Detailed Summary Page. 11 CFR §104.3(b) and (d)

Please be advised that non-payment of interest on a loan may be considered a prohibited contribution by the lending institution. Please amend your report to clarify the current status of the interest payment(s).

-Your calculations for Line 8 appear to be incorrect. Cash-on-hand at the close of the current reporting period should always equal the closing calendar year-to-date cash-on-hand amount. Please provide the corrected total on the Summary Page.

-Schedule A supporting Line 11(a)(i) of your report discloses several contributions from partnerships, however, the breakdown for these partnerships total \$0. Please amend your report to clarify this apparent discrepancy.

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-Schedule C discloses the outstanding balance at the close of the period for the loan owed to "The Private Bank and Trust Company" to be \$1,250,000. FEC calculations disclose this amount to be \$800,000. Please amend your report to clarify this discrepancy.

-Schedule C1 of your report discloses \$1,250,000 as the amount of the loan from "The Private Bank and Trust Company" with a draw on this loan of \$450,000. However, you also report the total outstanding balance of the loan as \$1,250,000. Please amend your report to clarify this discrepancy.

-Please provide a Schedule C or D, as appropriate, to support the entry of \$450,000 reported on Line 13 of the Summary Page. Loans and debts must be continuously reported until they are either repaid or settled. 11 CFR §104.3(d)

-Your report discloses a loan from a lending institution; however, you have not submitted a Schedule C-1 (copy attached) and a copy of the loan agreement. As an electronic filer, you must submit the Schedule C-1 electronically without the original signature from the lending institution. In addition, you must mail a copy of the loan agreement and a separate copy of the Schedule C-1 that contains the original signature from the lending institution. Please submit the missing documents. (11 CFR §§104.3(d)(2) and 104.18(h))

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions to federal candidates and committees should be properly disclosed on a separate Schedule B, supporting Line 23 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-You have received contributions from numerous entities, which appear to be unincorporated proprietorships or partnerships. Generally, these types of contributions are to be attributed to each person based on their percentage of ownership in the firm. Each person who has contributed in excess of \$200 since January 1 should be identified by name, address, occupation, name of employer, amount of contribution, and aggregate total on Schedule A. 11 CFR §110.1(k) Please amend your report by providing the omitted information.

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A response or 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. 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 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. Koeppen

Erik W. Koeppen
Senior Campaign Finance Analyst
Reports Analysis Division

