

**21L-34**

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: May 26, 2021

ANALYST: Connor McGuinness

I. COMMITTEE: International Longshore and Warehouse  
Union -- Political Action Fund  
C00176214  
Edwin R. Ferris, Treasurer  
1188 Franklin Street  
San Francisco, CA 94109

II. RELEVANT STATUTE: 52 U.S.C. § 30104 (g)(1)  
11 CFR § 104.4(c)

III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to Timely File 24-Hour Reports)**

International Longshore and Warehouse Union -- Political Action Fund (“the Committee”) failed to timely file one (1) 24-Hour Report totaling \$31,989.48 supporting one (1) independent expenditure disclosed on the 2020 30-Day Post-General Report, made after the 20<sup>th</sup> day but more than 24 hours before the day of the 2020 General Election (Attachment 2).

On December 2, 2020, the Committee filed its 2020 30-Day Post-General Report, covering the period from October 15, 2020 through November 23, 2020. The report included a Schedule E (Itemized Independent Expenditures) disclosing one (1) independent expenditure totaling \$31,989.48 made in support of one (1) Federal candidate (Image 202012029337451859).

On February 10, 2021, Elizabeth Homes, a representative of the Committee, called the Reports Analysis Division (RAD) Analyst regarding a 24-Hour Report that the

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Committee had failed to file. The Analyst advised the Committee to file the missing 24-Hour Report as soon as possible and that the issue may be referred to another Commission office for potential further action (Attachment 3).

On the same day, the Committee filed one (1) 24-Hour Report to support one (1) independent expenditure, totaling \$31,989.48, disseminated on October 31, 2020 (Image 202102109427653447).

On February 18, 2021, Elizabeth Homes called the RAD Analyst regarding the late filed 24-Hour Report. The Analyst explained that the late 24-Hour Report had been received by the Commission on February 10, 2021. The Analyst advised the Committee that they could file an FEC Form 99 (Miscellaneous Electronic Submission) to provide further clarification on the late filed 24-Hour Report (Attachment 3).

On February 19, 2021, the Committee filed an FEC Form 99 referencing the 24-Hour Report filed on February 10, 2021 which stated, in part:

“As a relatively small committee that primarily makes contributions to candidates, we rarely make independent expenditures of more than a couple of hundred dollars in any election. After reviewing our filings, we discovered that we inadvertently did not file one 48-hour report and one 24-hour report for independent expenditures made for yard signs and bumper stickers. We are working on a new process to help ensure this does not happen again, including by improving training for staff and improving internal checklists and review processes.

-In addition to filing the missing 48-hour report, we reviewed all other reports for the last year and identified an independent expenditure that should have been included in a 24-hour report. The committee made an expenditure to print additional lawn signs and bumper stickers on October 31, 2020. This was reported on the committee's post-general election report, but inadvertently was not reported on a 24-hour report. We acted immediately to correct this and a 24-hour report was filed on February 10, 2021 (image number 202102109427653447).

Again, our failure to file these reports was entirely inadvertent, and we took steps immediately to correct the problems; we will certainly strive to be more careful in the future. If you have any questions or wish to discuss the matter further, please do not hesitate to contact me” (Image 202102199428641586).

On February 28, 2021, a Request for Additional Information (RFAI) was sent to the Committee referencing the 2020 30-Day Post-General Report. The RFAI noted that the Committee may have failed to timely file one (1) or more of the required 24-Hour Reports regarding independent expenditures. A chart was included with the RFAI identifying one (1) independent expenditure, totaling \$31,989.48, for which a 24-Hour Report had not been timely filed (Images 202102280300109426-28).

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On March 3, 2021, the Committee filed an FEC Form 99 in response to the RFAI referencing the 2020 30-Day Post-General Report, which stated:

“This submission responds to the Request for Additional Information dated February 28, 2021, regarding the expenditure reported in our 30 Day Post-General Report (10/15/2020-11/23/2020). As we noted in our Form 99 MISC filed on February 19, 2021, upon discovering that we inadvertently did not file a 24-hour report for this expenditure, we immediately acted to correct this by filing a 24-hour report on February 10, 2021 (image number 202102109427653447). If you have any questions or wish to discuss the matter further, please do not hesitate to contact me” (Image 202103039440053425).

To date, no further communications have been received from the Committee regarding this matter.

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O-Index (2021-2022)															
Cmte. ID: C00176214				Cmte. Name: INTERNATIONAL LONGSHORE AND WAREHOUSE UNION -- POLITICAL ACTION FUND											
Treasurer Name: FERRIS, EDWIN R				Address: 1188 FRANKLIN STREET, SAN FRANCISCO, CA 94109											
Cmte. Type: Q (QUALIFIED NON-PARTY)				Cmte. Designation: B (LOBBYIST/REGISTRANT PAC)				Filing Frequency: MONTHLY FILER							
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			2/19/2021	1	202102199428641586				-	-	-	-	-	-	-
MS-T			3/3/2021	1	202103039440053425				-	-	-	-	-	-	-
F3XN	M2	N	2/17/2021	7	202102179428285075	1/1/2021	1/31/2021		\$252,787	\$8,102	\$0	\$260,889	-	-	\$0
F3XN	M3	N	3/18/2021	9	202103189441294921	2/1/2021	2/28/2021		\$260,889	\$5,579	\$8,500	\$257,969	-	-	\$0
F3XN	M4	N	4/9/2021	11	202104099443155420	3/1/2021	3/31/2021		\$257,969	\$5,260	\$5,500	\$257,729	-	-	\$0
F3XN	M5	N	5/7/2021	20	202105079446360666	4/1/2021	4/30/2021		\$257,729	\$7,729	\$5,500	\$259,959	-	-	\$0
F24N	48		2/10/2021	1	202102109427653446				-	-	-	-	-	-	-
F24N	24		2/10/2021	1	202102109427653447				-	-	-	-	-	-	-
<b>Totals</b>										<b>\$26,671</b>	<b>\$19,500</b>				

O-Index (2019-2020)															
Cmte. ID: C00176214				Cmte. Name: INTERNATIONAL LONGSHORE AND WAREHOUSE UNION -- POLITICAL ACTION FUND											
Treasurer Name: FERRIS, EDWIN R				Address: 1188 FRANKLIN STREET, SAN FRANCISCO, CA 94109											
Cmte. Type: Q (QUALIFIED NON-PARTY)				Cmte. Designation: B (LOBBYIST/REGISTRANT PAC)				Filing Frequency: MONTHLY FILER							
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-N		A	3/12/2019	1	201903120300035336				-	-	-	-	-	-	-
RQ1		A	3/17/2019	2	201903170300035675			3/17/2019	-	-	-	-	-	-	-
RQ1		A	4/2/2019	2	201904030300036546			4/2/2019	-	-	-	-	-	-	-
RQ2	M10	N	1/26/2021	3	202101260300101918	9/1/2020	9/30/2020	1/26/2021	-	-	-	-	-	-	-
RQ2	30G	N	2/28/2021	3	202102280300109426	10/15/2020	11/23/2020	2/28/2021	-	-	-	-	-	-	-
F3XN	M2	N	2/16/2019	8	201902169145520104	1/1/2019	1/31/2019		\$316,713	\$4,534	\$3,800	\$317,447	-	-	\$0
F3XN	M3	N	3/15/2019	11	201903159145712601	2/1/2019	2/28/2019		\$317,447	\$5,413	\$10,500	\$312,360	-	-	\$0
F3XN	M4	N	4/12/2019	12	201904129146107308	3/1/2019	3/31/2019		\$312,360	\$3,078	\$3,350	\$312,088	-	-	\$0
F3XN	M5	N	5/9/2019	18	201905099149657952	4/1/2019	4/30/2019		\$312,088	\$5,508	\$4,000	\$313,596	-	-	\$0
F3XN	M6	N	6/7/2019	26	201906079149956228	5/1/2019	5/31/2019		\$313,596	\$5,743	\$500	\$318,839	-	-	\$0
F3XN	M7	N	7/18/2019	51	201907189151427869	6/1/2019	6/30/2019		\$318,839	\$4,592	\$18,200	\$305,232	-	-	\$0
F3XN	M8	N	8/13/2019	49	201908139162850780	7/1/2019	7/31/2019		\$305,232	\$5,393	\$1,000	\$309,625	-	-	\$0
F3XA	M8	A	8/15/2019	50	201908159162879152	7/1/2019	7/31/2019		\$305,232	\$5,383	\$1,012	\$309,603	-	-	\$0
F3XN	M9	N	9/11/2019	59	201909119163217604	8/1/2019	8/31/2019		\$309,603	\$4,864	\$1,750	\$312,717	-	-	\$0
F3XN	M10	N	10/16/2019	52	201910169164985913	9/1/2019	9/30/2019		\$312,717	\$5,127	\$13,500	\$304,345	-	-	\$0
F3XN	M11	N	11/5/2019	74	201911059165328960	10/1/2019	10/31/2019		\$304,345	\$3,410	\$2,500	\$305,255	-	-	\$0
F3XA	M11	A	11/19/2019	74	201911199165637288	10/1/2019	10/31/2019		\$304,345	\$3,430	\$2,500	\$305,275	-	-	\$0
F3XN	M12	N	12/10/2019	64	201912109166170756	11/1/2019	11/30/2019		\$305,275	\$3,468	\$1,000	\$307,743	-	-	\$0
F3XA	M12	A	12/26/2019	69	201912269166882319	11/1/2019	11/30/2019		\$305,275	\$3,787	\$1,000	\$308,062	-	-	\$0
F3XN	YE	N	1/13/2020	77	202001139167162260	12/1/2019	12/31/2019		\$308,062	\$3,658	\$9,500	\$302,221	-	-	\$0
F3XN	M2	N	2/18/2020	12	202002189186515489	1/1/2020	1/31/2020		\$302,221	\$9,534	\$12,500	\$299,255	-	-	\$0
F3XN	M3	N	3/19/2020	19	202003199203918700	2/1/2020	2/29/2020		\$299,255	\$18,828	\$12,450	\$305,633	-	-	\$0
F3XN	M4	N	4/16/2020	32	202004169219669913	3/1/2020	3/31/2020		\$305,633	\$46,516	(\$488)	\$352,638	-	-	\$0
F3XN	M5	N	5/13/2020	20	202005139232676613	4/1/2020	4/30/2020		\$352,638	\$9,354	\$3,500	\$358,492	-	-	\$0
F3XN	M6	N	6/12/2020	32	202006129239777895	5/1/2020	5/31/2020		\$358,492	\$11,106	\$9,000	\$360,599	-	-	\$0
F3XN	M7	N	7/8/2020	50	202007089244389274	6/1/2020	6/30/2020		\$360,599	\$6,234	\$7,500	\$359,333	-	-	\$0
F3XN	M8	N	8/12/2020	59	202008129261297948	7/1/2020	7/31/2020		\$359,333	\$5,472	\$5,000	\$359,806	-	-	\$0
F3XN	M9	N	9/10/2020	62	202009109267130663	8/1/2020	8/31/2020		\$359,806	\$4,449	\$11,500	\$352,755	-	-	\$0

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F3XN	M10	N	10/15/2020	60	202010159294321594	9/1/2020	9/30/2020		\$352,755	\$5,046	\$28,336	\$329,465	-	-	\$0
F3XN	12G	N	10/20/2020	43	202010209297829575	10/1/2020	10/14/2020		\$329,465	\$2,705	\$18,500	\$313,670	-	-	\$0
F3XN	30G	N	12/2/2020	145	202012029337451715	10/15/2020	11/23/2020		\$313,670	\$9,417	\$74,989	\$248,098	-	-	\$0
F3XN	YE	N	1/26/2021	95	202101269413416290	11/24/2020	12/31/2020		\$248,098	\$4,689	\$0	\$252,787	-	-	\$0
F1		A	1/29/2019	8	201901300300259870				-	-	-	-	-	-	-
F1A		A	3/20/2019	6	201903209145894090				-	-	-	-	-	-	-
F1A		A	3/13/2019	6	201903139145703472				-	-	-	-	-	-	-
F1A		A	4/9/2019	6	201904099146057939				-	-	-	-	-	-	-
<b>Totals</b>										<b>\$188,473</b>	<b>\$252,399</b>				

O-Index (2017-2018)															
Cmte. ID: C00176214 Cmte. Name: INTERNATIONAL LONGSHORE AND WAREHOUSE UNION -- POLITICAL ACTION FUND															
Treasurer Name: FERRIS, EDWIN R Address: 1188 FRANKLIN STREET, SAN FRANCISCO, CA 94109															
Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: B (LOBBYIST/REGISTRANT PAC) Filing Frequency: MONTHLY FILER															
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F3XN	M2	N	2/17/2017	7	201702179049716857	1/1/2017	1/31/2017		\$395,713	\$4,858	\$0	\$400,571	-	-	\$0
F3XN	M3	N	3/16/2017	11	201703169050871367	2/1/2017	2/28/2017		\$400,571	\$6,262	\$20,510	\$386,324	-	-	\$0
F3XA	M3	A	8/7/2017	11	201708079070297476	2/1/2017	2/28/2017		\$400,571	\$6,262	\$20,510	\$386,324	-	-	\$0
F3XN	M4	N	4/11/2017	10	201704119052079763	3/1/2017	3/31/2017		\$386,324	\$5,529	\$1,500	\$390,353	-	-	\$0
F3XA	M4	A	8/7/2017	10	201708079070297487	3/1/2017	3/31/2017		\$386,324	\$5,529	\$1,500	\$390,353	-	-	\$0
F3XN	M5	N	5/18/2017	14	201705189054017241	4/1/2017	4/30/2017		\$390,353	\$3,550	\$2,500	\$391,403	-	-	\$0
F3XA	M5	A	8/7/2017	14	201708079070297497	4/1/2017	4/30/2017		\$390,353	\$3,550	\$2,500	\$391,403	-	-	\$0
F3XN	M6	N	6/13/2017	25	201706139056514647	5/1/2017	5/31/2017		\$391,403	\$5,530	\$0	\$396,933	-	-	\$0
F3XA	M6	A	8/7/2017	25	201708079070297511	5/1/2017	5/31/2017		\$391,403	\$5,530	\$0	\$396,933	-	-	\$0
F3XN	M7	N	7/18/2017	54	201707189066779041	6/1/2017	6/30/2017		\$396,933	\$4,681	\$16,000	\$385,615	-	-	\$0
F3XA	M7	A	8/7/2017	54	201708079070297536	6/1/2017	6/30/2017		\$396,933	\$4,681	\$16,000	\$385,615	-	-	\$0
F3XN	M8	N	8/8/2017	49	201708089070300507	7/1/2017	7/31/2017		\$385,615	\$3,809	\$5,500	\$383,924	-	-	\$0
F3XN	M9	N	9/19/2017	66	201709199074765654	8/1/2017	8/31/2017		\$383,924	\$3,951	\$5,012	\$382,863	-	-	\$0
F3XA	M9	A	9/22/2017	67	201709229075516675	8/1/2017	8/31/2017		\$383,924	\$4,038	\$5,012	\$382,950	-	-	\$0
F3XN	M10	N	10/12/2017	53	201710129075619925	9/1/2017	9/30/2017		\$382,950	\$2,693	\$4,000	\$381,643	-	-	\$0
F3XN	M11	N	11/8/2017	71	201711089086618065	10/1/2017	10/31/2017		\$381,643	\$4,018	\$13,000	\$372,661	-	-	\$0
F3XN	M12	N	12/13/2017	72	201712139089185575	11/1/2017	11/30/2017		\$372,661	\$4,260	\$6,500	\$370,421	-	-	\$0
F3XA	M12	A	12/13/2017	73	201712139089185670	11/1/2017	11/30/2017		\$372,661	\$4,340	\$6,500	\$370,501	-	-	\$0
F3XN	YE	N	1/24/2018	73	201801249090624494	12/1/2017	12/31/2017		\$370,501	\$3,200	\$2,510	\$371,192	-	-	\$0
F3XN	M2	N	2/13/2018	9	201802139094564999	1/1/2018	1/31/2018		\$371,192	\$6,086	\$2,000	\$375,279	-	-	\$0
F3XN	M3	N	3/16/2018	9	201803169096564237	2/1/2018	2/28/2018		\$375,279	\$7,341	\$0	\$382,620	-	-	\$0
F3XN	M4	N	4/9/2018	14	201804099104800216	3/1/2018	3/31/2018		\$382,620	\$3,852	\$6,500	\$379,973	-	-	\$0
F3XN	M5	N	5/10/2018	16	201805109112012838	4/1/2018	4/30/2018		\$379,973	\$3,032	\$3,500	\$379,505	-	-	\$0
F3XN	M6	N	6/18/2018	29	201806189113732876	5/1/2018	5/31/2018		\$379,505	\$4,898	\$5,000	\$379,403	-	-	\$0
F3XN	M7	N	7/19/2018	51	201807199115792939	6/1/2018	6/30/2018		\$379,403	\$2,968	\$20,000	\$362,372	-	-	\$0
F3XN	M8	N	8/14/2018	61	201808149119619838	7/1/2018	7/31/2018		\$362,372	\$4,242	\$6,529	\$360,084	-	-	\$0
F3XA	M8	A	8/24/2018	61	201808249121520137	7/1/2018	7/31/2018		\$362,372	\$4,242	\$6,565	\$360,048	-	-	\$0
F3XN	M9	N	9/18/2018	60	201809189121750991	8/1/2018	8/31/2018		\$360,048	\$4,690	\$48,500	\$316,238	-	-	\$0
F3XN	M10	N	10/17/2018	58	201810179125564868	9/1/2018	9/30/2018		\$316,238	\$4,572	\$1,500	\$319,311	-	-	\$0
F3XN	12G	N	10/23/2018	40	201810239130805442	10/1/2018	10/17/2018		\$319,311	\$664	\$5,349	\$314,625	-	-	\$0
F3XN	30G	N	12/3/2018	90	201812039133904256	10/18/2018	11/26/2018		\$314,625	\$3,434	\$17,012	\$301,047	-	-	\$0
F3XN	YE	N	1/7/2019	80	201901079143753845	11/27/2018	12/31/2018		\$301,047	\$4,165	(\$11,500)	\$316,713	-	-	\$0
<b>Totals</b>										<b>\$102,458</b>	<b>\$181,459</b>				

**International Longshore and Warehouse Union -- Political Action Fund  
(C00176214)**

2020 30-Day Post-General Report, received December 2, 2020

24-Hour Report Not Timely Filed

<b>Name of Payee</b>	<b>Date of Dissemination (Schedule E)</b>	<b>Expenditure Amount</b>	<b>Candidate Supported</b>	<b>Election</b>	<b>24-Hour Report Filed</b>
Spotlight Productions	10/31/2020	<b>\$31,989.48</b> <i>24-Hour Report Required</i>	Joseph R Biden Jr	2020 General	2/10/2021