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AMALGAMATED TRANSIT UNION

5025 WISCONSIN AVE., N.W. WASHINGTON, D.C. 20016-4139
(202) 537-1645 FAX (202) 244-7824

July 22, 2005

Lynn M. Fraser
Assistant Director, Alternative Dispute Resolution Office
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: ° ADR #244
Amalgamated Transit Union-COPE

Dear Ms. Fraser:

In compliance with the Negotiated Settlement in the above referenced matter, effective June 30, 2005, I am submitting the documents and information required pursuant to paragraph 6 of the settlement, which reads as follows:

6. Respondents, in an effort to avoid similar errors in the future and to update the information received at a 2001 FEC seminar, agree to: (a) develop an FEC compliance manual; and (b) pay a civil penalty of \$5,000.

Enclosed, per this agreement and instructions received from your office, I have enclosed the Table of Contents for our ATU-COPE Procedures and Policy Manual. This manual contains the ATU-COPE's internal policies and procedures, as well as all federal and state campaign finance and tax rules and regulations governing PAC activities. The manual was revised and updated on June 22, 2005, to incorporate recent changes in the federal campaign finance laws, including changes to the independent expenditure reporting requirements.

Also enclosed is a check, dated July 13, 2005, payable to the FEC for \$5,000 to satisfy the civil penalty.

I trust that this satisfies our obligations under the settlement. If you require any additional information or materials, please don't hesitate to contact me at 202-756-2702, or via e-mail at karenh@atu.org.

Thank you for your assistance in resolving this matter.

Sincerely,

Karen A. Head, Esq.
Director of Political and Regulatory Affairs

kh/mrr

Enclosures

c: Ann Washenko, COPE Administrator
Oscar Owens, Treasurer

RECEIVED
FEC MAIL
OPERATIONS CENTER
2005 JUL 26 A 10 45

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ATU-COPE Procedures and Policy Manual

Table of Contents

1. General ATU-COPE Information and Materials
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Updated July 22, 2005

Prepared by the ATU-COPE Department and the ATU Legal Department

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Prohibited Disbursements

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Updated July 22, 2005

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ATU-COPE New York
ATU-COPE Maryland
ATU-COPE Florida
ATU-COPE Virginia
ATU-COPE Missouri

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 - ATU-COPE Upgrade Awards
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 - ATU Website Policy

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Amalgamated Transit Union
5025 Wisconsin Avenue, N.W.
Washington, D.C. 20016-4139

No. 339673

FEDERAL ELECTION COMMISSION

INVOICE NO. INVOICE DATE DESCRIPTION

DISCOUNT

GROSS AMOUNT

NET AMOUNT

FEC SETTLEME 7/13/05 CASE #ADR 244

5,000.00

5,000.00

000000

CHECK NUMBER 0339673

TOTALS 5,000.00

5,000.00



AMALGAMATED TRANSIT UNION
WASHINGTON, D.C.



CITIBANK, F.S.B. 1-800-926-1067
PO BOX 18967
WASHINGTON, DC 20036-0967

No. 339673

15-7011
2540

DATE

CHECK NO.

7/13/05

PAY TO THE
ORDER OF

THE SUM OF \$5,000.00 DOLLARS

AMOUNT

\$ *****5,000.00

FEDERAL ELECTION COMMISSION

DC 20463

WASHINGTON

INTERNATIONAL SECRETARY-TREASURER