



FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

June 10, 2005

**MEMORANDUM**

TO: ALLAN D. SILBERMAN  
DIRECTOR  
ALTERNATIVE DISPUTE RESOLUTION

FROM: PATRICIA CARMONA *PC*  
CHIEF, COMPLIANCE BRANCH  
REPORTS ANALYSIS DIVISION

SUBJECT: TRANSFER OF ADMINISTRATIVE FINE MATTER 1325 AND 1386

The Reports Analysis Division is transferring, as per the June 7, 2005 Executive Session, all active Administrative Fine (AF) matters for the National Italian Committee.

Attached are the complete files for Administrative Fine 1325 (Reason to Believe (RTB) assessed during the AF Extraction Report for the 2004 Post General Report) and 1386 (RTB assessed during the AF Extraction Report for the 2004 Year End Report).

If you have any questions, please contact me at 694-1150.

Attachment: AF File 1325/1386

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CONFIRMATION OF CMGM

WESTERN UNION COMMERCIAL SERVICES  
TO: VINCENT M LASORSA CPA MBA  
NATIONAL ITALIAN AMERICAN POLITICAL ACTI  
1205 LOCUST ST  
PHILADELPHIA PA 19107-5457FEDERAL ELECTION COMMISSION  
DAYNA BROWN  
999 E ST NW # 709  
WASHINGTON DC 20463

JUNE 15, 2004

VINCENT M LASORSA CPA MBA  
NATIONAL ITALIAN AMERICAN POLITICAL ACTI  
1205 LOCUST STREET  
PHILADELPHIA PA 19107C00355388  
AF#: 1130

DEAR VINCENT M LASORSA CPA MBA:

THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED ("THE ACT"), REQUIRES THAT YOUR COMMITTEE FILE AN APRIL QUARTERLY REPORT OF RECEIPTS AND DISBURSEMENTS IN A CALENDAR YEAR DURING WHICH THERE IS A REGULARLY SCHEDULED ELECTION. THIS REPORT, COVERING THE PERIOD THROUGH MARCH 31ST, SHALL BE FILED NO LATER THAN APRIL 15TH. 2 U.S.C. 434(A). YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT. RECORDS AT THE FEDERAL ELECTION COMMISSION ("FEC") INDICATE THAT THIS REPORT WAS NOT FILED WITHIN THIRTY (30) DAYS OF THE DUE DATE. YOU SHOULD FILE THIS REPORT IF YOU HAVE NOT ALREADY DONE SO.

THE ACT WAS FURTHER AMENDED IN 1999 TO PERMIT THE FEC TO IMPOSE CIVIL MONEY PENALTIES FOR VIOLATIONS OF THE REPORTING REQUIREMENTS OF 2 U.S.C. 434(A). 2 U.S.C. 437G(A)(4). ON 06/10/2004, THE FEC FOUND THAT THERE IS REASON TO BELIEVE ("RTB") THAT NATIONAL ITALIAN AMERICAN POLITICAL ACTI AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) BY FAILING TO FILE TIMELY THIS REPORT ON OR BEFORE APRIL 15TH. BASED ON THE FEC'S SCHEDULES OF CIVIL MONEY PENALTIES AT 11 C.F.R. 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT THE RTB STAGE IS \$2475. IT IS DUE BY 07/20/2004 AND IS BASED ON THESE FACTORS:

ELECTION SENSITIVITY OF REPORT: NOT ELECTION SENSITIVE  
LEVEL OF ACTIVITY: \$40993  
NUMBER OF DAYS LATE: NOT FILED  
NUMBER OF PREVIOUS CIVIL MONEY PENALTIES ASSESSED: 7

TO PAY THE CALCULATED CIVIL MONEY PENALTY

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TO PAY THE CALCULATED CIVIL MONEY PENALTY, SEND THE ENCLOSED REMITTANCE AND YOUR PAYMENT TO THE FEC AT THE ADDRESS ON PAGE 3. UPON RECEIPT OF YOUR PAYMENT, THE FEC WILL SEND YOU A FINAL DETERMINATION LETTER.

TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY

TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY, YOU MUST SUBMIT A WRITTEN RESPONSE, INCLUDING THE AF# FOUND ON PAGE ONE, TO THE FEC'S OFFICE OF ADMINISTRATIVE REVIEW, 999 E STREET, NW, WASHINGTON, DC 20463. YOUR RESPONSE MUST BE RECEIVED BY 07/20/2004. YOUR WRITTEN RESPONSE MUST INCLUDE THE REASON(S) WHY YOU ARE CHALLENGING THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY. THE FEC WILL ONLY CONSIDER CHALLENGES THAT ARE BASED ON A FACTUAL ERROR, MISCALCULATION OF THE CALCULATED CIVIL MONEY PENALTY BY THE FEC, OR THE EXISTENCE OF EXTRAORDINARY CIRCUMSTANCES THAT PERSISTED FOR MORE THAN 48 HOURS THAT WERE BEYOND YOUR CONTROL AND PREVENTED YOU FROM FILING THE REPORT IN A TIMELY MANNER. YOUR RESPONSE MUST INCLUDE THE FACTUAL BASIS SUPPORTING THE REASON(S) AND SUPPORTING DOCUMENTATION. THE FEC STRONGLY ENCOURAGES THAT DOCUMENTS BE SUBMITTED IN THE FORM OF AFFIDAVITS OR DECLARATIONS. EXAMPLES OF CIRCUMSTANCES THAT WILL NOT BE CONSIDERED EXTRAORDINARY INCLUDE, BUT ARE NOT LIMITED TO, NEGLIGENCE, PROBLEMS WITH VENDORS OR CONTRACTORS, STAFF ILLNESS, COMPUTER FAILURES AND SIMILAR CIRCUMSTANCES. 11 C.F.R. 111.35(B)(1)(III) AND (4).

YOUR FAILURE TO RAISE AN ARGUMENT IN A TIMELY FASHION DURING THE ADMINISTRATIVE PROCESS SHALL BE DEEMED A WAIVER OF YOUR RIGHT TO PRESENT SUCH ARGUMENT IN A PETITION TO THE DISTRICT COURT UNDER 2 U.S.C. 437G. 11 C.F.R. 111.38.

IF YOU INTEND TO BE REPRESENTED BY COUNSEL, PLEASE ADVISE THE OFFICE OF ADMINISTRATIVE REVIEW. YOU SHOULD PROVIDE, IN WRITING, THE NAME, ADDRESS AND TELEPHONE NUMBER OF YOUR COUNSEL AND AUTHORIZE COUNSEL TO RECEIVE NOTIFICATIONS AND COMMUNICATIONS RELATING TO THIS CHALLENGE AND IMPOSITION OF THE CALCULATED CIVIL MONEY PENALTY.

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A CHALLENGE

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A WRITTEN RESPONSE, THE FEC WILL ASSUME THAT THE PRECEDING FACTUAL ALLEGATIONS ARE TRUE AND MAKE A FINAL DETERMINATION THAT NATIONAL ITALIAN AMERICAN POLITICAL ACTI AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) AND ASSESS A CIVIL MONEY PENALTY.

UNPAID CIVIL MONEY PENALTIES ASSESSED THROUGH THE ADMINISTRATIVE FINE REGULATIONS WILL BE SUBJECT TO THE DEBT COLLECTION ACT OF 1982("DCA")AS AMENDED BY THE DEBT COLLECTION IMPROVEMENT ACT OF 1996, 31 U.S.C. 3701 ET SEQ. THE FEC MAY TAKE ANY AND ALL APPROPRIATE ACTION AUTHORIZED AND REQUIRED BY THE DCA, AS AMENDED, INCLUDING TRANSFER TO THE U.S. DEPARTMENT OF THE TREASURY FOR COLLECTION. 11 C.F.R. 111.45.

THIS MATTER WAS GENERATED BASED ON INFORMATION ASCERTAINED BY THE FEC IN THE NORMAL COURSE OF CARRYING OUT ITS SUPERVISORY RESPONSIBILITIES. 2 U.S.C. 437G(A)(2). IT WILL REMAIN CONFIDENTIAL IN ACCORDANCE WITH 2 U.S.C. 437G(A)(4)(B) AND 437G(A)(12)(A) UNTIL IT IS PLACED ON THE PUBLIC RECORD IN ACCORDANCE WITH 11 C.F.R. 111.42, UNLESS YOU NOTIFY THE FEC IN WRITING THAT YOU WISH THE

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MATTER TO BE MADE PUBLIC.

ADDITIONAL INFORMATION ON THE FEC'S ADMINISTRATIVE FINE PROGRAM, INCLUDING THE FINAL REGULATIONS, IS LOCATED AT THE FEC'S WEBSITE AT WWW.FEC.GOV. IF YOU HAVE QUESTIONS REGARDING THE PAYMENT OF THE CALCULATED CIVIL MONEY PENALTY, PLEASE CONTACT DAYNA C. BROWN IN THE REPORTS ANALYSIS DIVISION AT OUR TOLL FREE NUMBER (800)424-9530 (PRESS 1, THEN PRESS 2) OR (202)694-1130. IF YOU HAVE QUESTIONS REGARDING THE SUBMISSION OF A CHALLENGE, PLEASE CONTACT THE OFFICE OF ADMINISTRATIVE REVIEW AT OUR TOLL FREE NUMBER (800)424-9530 (PRESS 0, THEN EXT. 1660) OR (202)694-1660.

SINCERELY,

BRADLEY A. SMITH  
CHAIRMAN\* \* \* \* \*  
ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 C.F.R. 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT RTB IS \$2475 FOR THE 2004 APRIL QUARTERLY REPORT.

PLEASE MAIL THIS REMITTANCE WITH A CHECK OR MONEY ORDER MADE PAYABLE TO THE FEDERAL ELECTION COMMISSION TO THE FOLLOWING ADDRESS:  
FEDERAL ELECTION COMMISSION  
P.O. BOX 952182  
ST. LOUIS, MO 63195-2182

IF YOU CHOOSE TO SEND YOUR REMITTANCE AND PAYMENT BY COURIER OR OVERNIGHT DELIVERY, PLEASE USE THIS ADDRESS:  
U.S. BANK - GOVERNMENT LOCKBOX  
FEC #952182  
1005 CONVENTION PLAZA  
ST. LOUIS, MO 63101

THE REMITTANCE AND YOUR PAYMENT ARE DUE BY 07/20/2004. UPON RECEIPT OF YOUR REMITTANCE AND PAYMENT, THE FEC WILL SEND YOU A FINAL DETERMINATION LETTER.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT  
-----

FOR: NATIONAL ITALIAN AMERICAN POLITICAL ACTI

FE ID#: C00355388

AF#: 1130

PAYMENT DUE DATE: 07/20/2004

PAYMENT AMOUNT DUE: \$2475

FEC OFFICE  
ADMIN REVIEW

2004 JUL 20 P 3: 33

Anthony N. Mallace, CPA, J.D.

109 West Merchant Street

Audubon, NJ 08106

Tel. (856) 546-1800

Fax (856) 546-0142

e-mail: [atty\\_cpa@netzero.com](mailto:atty_cpa@netzero.com)

[www.mallace.com](http://www.mallace.com)

RECEIVED  
FEC MAIL  
OPERATIONS CENTER

2004 JUL 20 A 11: 35

July 19, 2004

Federal Election Commission  
Office of Administrative Review  
999 E Street, N.W.  
Washington, DC 20463

Re: National Italian American Political Action Committee  
C00355388

Dear Sir or Madam ;

I am the treasurer for the above referenced entity and am writing in response to your notice of fine issued relative to the April 15, 2004 quarterly filing. (A copy of the notification letter is attached for your reference).

The entity in question has recently implemented procedures to ensure future timely filings of all required reports. As treasurer, I have undertaken to receive financial information on a monthly basis in order to ensure that all such information is maintained current on an ongoing basis. The previous treasurer did not maintain these controls. As a result, the circumstances that resulted in several late filings will not recur in the future.

With regard to the quarter at issue, the entity has no paid staff. The financial information about all funds received by the entity has historically been received and maintained by an independent entity which acted as a fund raiser. However, in previous years, the treasurer did not get involved to the extent that I am now involved in making sure that the books and records are maintained on a current basis. For this reason, I am confident that my claim that the circumstances which previously existed and which resulted in late filings will not recur. It should be noted that the July 15, 2004 quarterly filing was filed on a timely basis.

In addition, the difficulties that I encountered as the new treasurer of this political action committee were further compounded by several computer problems, including the complete destruction of the data base of previous quarterly filings. While computer failures are not in and of themselves deemed sufficient cause to excuse a filing failure, those difficulties along with the need to implement procedures to overcome internal control and procedural weaknesses of the previous treasurer resulted in circumstances that did not allow us to finalize the reports on time.

Federal Election Commission  
July 19, 2004  
Page 2

At the same time that our data base was lost, we were unable to receive timely assistance from the technical advisor assigned to us. Subsequently, we did receive assistance and were able to comply once our data base was retrieved. We have recently been assigned to a new technical advisor because our previous advisor had left the FEC. As soon as the data base was retrieved, the report was immediately filed.


As I have indicated, the new executive committee has worked diligently to overcome all of these weaknesses and beginning with the most recent filing which was due on July 15, 2004, will ensure that the entity will not be late in the future. Further, the computer system used by this Committee has been upgraded substantially in order to provide the computer capabilities that will avoid future computer failures.

This Political Action Committee has paid all fines previously levied. However, given the efforts made and successfully implemented to ensure current and future compliance, we respectfully request that the Commission consider the totality of the circumstances and abate this penalty.

If you require any additional information, please do not hesitate to contact me directly.

Thank you for your consideration.

Very truly yours,



Anthony N. Mallace, CPA, J.D.

cc: Joseph Tarantino  
Joseph Auteri

**LETTER TO FEDERAL ELECTION COMMISSION SENT BY EXPRESS MAIL**  
**ARTICLE NO. ER 367140555 US**

F.B.C. RTB  
999 E Street, NW  
Washington, DC 20463

**WESTERN  
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**MAILGRAM**



UNITED STATES  
POSTAL SERVICE

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EM161C5

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CERTIFIED RETURN RECEIPT P 910 149 640  
VINCENT M LASORSA CPA MBA  
NATIONAL ITALIAN AMERICAN POLITICAL ACTI  
1205 LOCUST ST  
PHILADELPHIA PA 19107-5457

\*\*\*\*CERTIFIED\*\*\*\*

June 15, 2004

VINCENT M LASORSA CPA MBA  
NATIONAL ITALIAN AMERICAN POLITICAL ACTI  
1205 LOCUST STREET  
PHILADELPHIA PA 19107

C00355388  
AF#: 1130

Dear VINCENT M LASORSA CPA MBA:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file an April Quarterly Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled election. This report, covering the period through March 31st, shall be filed no later than April 15th. 2 U.S.C. 434(a). You were previously notified of the due date for this report. Records at the Federal Election Commission ("FEC") indicate that this report was not filed within thirty (30) days of the due date. You should file this report if you have not already done so.

The Act was further amended in 1999 to permit the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. 434(a). 2 U.S.C. 437g(a)(4). On 06/10/2004, the FEC found that there is reason to believe ("RTB") that NATIONAL ITALIAN AMERICAN POLITICAL ACTI and you, as treasurer, violated 2 U.S.C. 434(a) by failing to file timely this report on or before April 15th. Based on the FEC's schedules of civil money penalties at 11 C.F.R. 111.43, the amount of your civil money penalty calculated at the RTB stage is \$2475. It is due by 07/20/2004 and is based on these factors:

Election Sensitivity of Report: Not election sensitive  
Level of Activity: \$40993  
Number of Days Late: Not Filed  
Number of Previous Civil Money Penalties Assessed: 7

To Pay the Calculated Civil Money Penalty



PAGE 2

112521000479

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POSTAL SERVICE**

To pay the calculated civil money penalty, send the enclosed remittance and your payment to the FEC at the address on page 3. Upon receipt of your payment, the FEC will send you a final determination letter.

To Challenge the RTB Finding and/or Calculated Civil Money Penalty

To challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found on page one, to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must be received by 07/20/2004. Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty. The FEC will only consider challenges that are based on a factual error, miscalculation of the calculated civil money penalty by the FEC, or the existence of extraordinary circumstances that persisted for more than 48 hours that were beyond your control and prevented you from filing the report in a timely manner. Your response must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. Examples of circumstances that will not be considered extraordinary include, but are not limited to, negligence, problems with vendors or contractors, staff illness, computer failures and similar circumstances. 11 C.F.R. 111.35(b)(1)(iii) and (4).

Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of your right to present such argument in a petition to the district court under 2 U.S.C. 437g. 11 C.F.R. 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

**If You Do Not Pay The Calculated Civil Money Penalty or Submit a Challenge**

If you do not pay the calculated civil money penalty or submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that NATIONAL ITALIAN AMERICAN POLITICAL ACTI and you, as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. 3701 et seq. The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 C.F.R. 111.45.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. 437g(a)(4)(B) and 437g(a)(12)(A) until

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**MAILGRAM**UNITED STATES  
POSTAL SERVICE

it is placed on the public record in accordance with 11 C.F.R. 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

Additional information on the FEC's administrative fine program, including the final regulations, is located at the FEC's website at [www.FEC.gov](http://www.FEC.gov). If you have questions regarding the payment of the calculated civil money penalty, please contact Dayna C. Brown in the Reports Analysis Division at our toll free number (800)424-9530 (press 1, then press 2) or (202)694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

Sincerely,

Bradley A. Smith  
Chairman

\* \* \* \* \*  
**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 C.F.R. 111.43, the amount of your civil money penalty calculated at RTE is \$2475 for the 2004 APRIL QUARTERLY Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:  
Federal Election Commission  
P.O. Box 952182  
St. Louis, MO 63195-2182

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:  
U.S. Bank - Government Lockbox  
FEC #952182  
1005 Convention Plaza  
St. Louis, MO 63101

The remittance and your payment are due by 07/20/2004. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: NATIONAL ITALIAN AMERICAN POLITICAL ACTI

FE ID#: C00355388

AF#: 1130

PAYMENT DUE DATE: 07/20/2004

6-16-204 1:58PM

FROM

**WESTERN  
UNION**

**MAILGRAM**

PAGE 4

112521000479



UNITED STATES  
POSTAL SERVICE

PAYMENT AMOUNT DUE: \$2475

MGMCOMP 17:37 EST

To order by Mailgram Message, see reverse side for Western Union's toll-free number

251903625108



FEDERAL ELECTION COMMISSION

WASHINGTON, D C 20463

Via First Class Mail

July 20, 2004

Anthony N. Mallace, CPA, J.D., as Treasurer  
National Italian American Political Action Committee  
1205 Locust Street  
Philadelphia, PA 19107

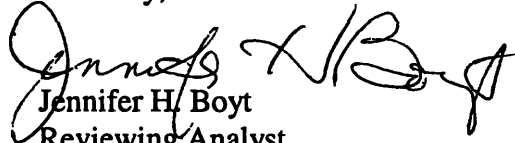
C00355388

AF# 1130

Dear Mr. Mallace:

On July 20, 2004, the Commission received your written response ("challenge") which is being reviewed by the Office of Administrative Review. If you have any questions regarding your challenge, please contact this Office on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

Sincerely,

  
Jennifer H. Boyt  
Reviewing Analyst  
Office of Administrative Review




FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

August 17, 2004

**MEMORANDUM**

TO: JEFF CHUMLEY  
MANAGER, SYSTEMS ANALYSIS AND DESIGN BRANCH  
INFORMATION TECHNOLOGY DIVISION

FROM: SHAWN WOODHEAD WERTH   
REVIEWING OFFICER  
OFFICE OF ADMINISTRATIVE REVIEW

SUBJECT: AF# 1130 – NATIONAL ITALIAN AMERICAN POLITICAL  
ACTION COMMITTEE AND VINCENT M. LASORSA,  
AS TREASURER (C00355388)

On July 20, 2004, the Commission received a written response and supporting documentation ("challenge") from the respondents for the 2004 April Quarterly Report. In the challenge, the respondents state that they "were unable to receive timely assistance from the technical advisor assigned to us. Subsequently, we did receive assistance and were able to comply once our data base was retrieved. We have recently been assigned to a new technical advisor because our previous advisor had left the FEC." A copy of the challenge is attached for your review.

Please provide any information regarding the issue raised in the challenge. If you have no records relating to this request, please advise OAR accordingly.

Any information submitted by your office will be sent to the respondents, circulated to the Commission and placed on the public record. Please contact me at 694-1660 if you have any questions. Thank you.

Attachment




FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

October 25, 2004

**MEMORANDUM**

TO: JOHN D. GIBSON  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

FROM: SHAWN WOODHEAD WERTH   
REVIEWING OFFICER  
OFFICE OF ADMINISTRATIVE REVIEW

SUBJECT: AF# 1130 – NATIONAL ITALIAN AMERICAN POLITICAL  
ACTION COMMITTEE AND VINCENT M. LASORSA, AS  
TREASURER (C00355388)

On July 20, 2004, the Office of Administrative Review ("OAR") received a written response and supporting documentation ("challenge") from the respondents for the 2004 April Quarterly Report. In the challenge, the respondents cite computer problems and state that they "were unable to receive timely assistance from the technical advisor assigned to us. Subsequently, we did receive assistance and were able to comply once our data base was retrieved. We have recently been assigned to a new technical advisor because our previous advisor had left the FEC." A copy of the challenge is attached.

OAR requests that you forward any information regarding conversations between RAD staff and the respondents about the issues raised in the challenge. If you have no records relating to this request, please advise us accordingly.

Any information submitted by your office will be sent to the respondents, circulated to the Commission, and placed on the public record. Please contact me at 694-1660 if you have any questions. Thank you.

Attachment

**Date: November 3, 2004**

**REFERRAL TO OFFICE OF ADMINISTRATIVE REVIEW  
CHALLENGE RECEIVED**

**AF#: 1130**

**Committee Name: National Italian American PAC**

**Committee ID#: C00355388**

**Committee Address (if different than in RTB mailgram): N/A**

**Treasurer Name (if different than in RTB finding): Anthony N. Mallace CPA, J.D.**

**Attachments:**

**Copy of RTB Circulation Report Dated June 4, 2004 and RTB**

**Certification Dated June 18, 2004 – Previously Forwarded**

**Copy of RTB Mailgram - Attachment # : See Declaration**

**Certified Return Receipt (to be forwarded at later date if not yet received) -**

**Attachment #: 1**

**Telecons and Visitcons in Response to RTB Mailgram (Y/N): Y**

**Attachment # : 2**

**Original Correspondence Received by RAD in Response to**

**RTB Mailgram (Y/N): N**

**Attachment # : N/A**

**RAD Staff Declaration - Attachment # : 3**

PLACE STICKER AT TOP OF ENVELOPE  
TO THE RIGHT OF RETURN ADDRESS

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY						
<p> <input type="checkbox"/> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.  <input type="checkbox"/> Print your name and address on the reverse so that we can return the card to you.  <input type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits. </p> <p>1. Article Addressed to:</p> <p style="margin-left: 40px;"> VINCENT M LASORSA  CPA MBA  NATIONAL ITALIAN AMERICAN  POLITICAL ACTI    1205 LOCUST ST  PHILADELPHIA, PA 19107 </p> <p>2. Article Number (Transfer from service label)</p> <p style="margin-left: 40px;">70001670 0005 1341355</p>	<p>A. Signature</p> <p style="margin-left: 40px;">   <input type="checkbox"/> Agent  <input type="checkbox"/> Addressee </p> <p>B. Received by (Printed Name)</p> <p style="margin-left: 40px;">   </p> <p>C. Date of Delivery</p> <p style="margin-left: 40px;">6-16-04</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type</p> <table style="width: 100%;"> <tr> <td><input type="checkbox"/> Certified Mail</td> <td><input type="checkbox"/> Express Mail</td> </tr> <tr> <td><input type="checkbox"/> Registered</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td><input type="checkbox"/> C.O.D.</td> </tr> </table> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	<input type="checkbox"/> Certified Mail	<input type="checkbox"/> Express Mail	<input type="checkbox"/> Registered	<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Insured Mail	<input type="checkbox"/> C.O.D.
<input type="checkbox"/> Certified Mail	<input type="checkbox"/> Express Mail						
<input type="checkbox"/> Registered	<input type="checkbox"/> Return Receipt for Merchandise						
<input type="checkbox"/> Insured Mail	<input type="checkbox"/> C.O.D.						

PS Form 3811, August 2001

Domestic Return Receipt

2ACPRI-03-Z-0985



## Communication Log

**Date/Time:** 05/19/2004 04:03 PM

**ID:** C00355388

**Name:** NATIONAL ITALIAN AMERICAN POLITICAL  
ACTION COMMITTEE

**Phone:** (856) 904-9215

**EMail Address:**

**Candidate:**

**Type:** Phone Call

**Contact:** Anthony Mallace

**Title:** (unofficial) Treasurer

**Communications Category Type:**

**Summary:** I was authorized by J. Gibson to give the committee a call to encourage them to file their Q1 report, since they had 7 previous violations in the AF program, and of late had paid all but one. Mr. Mallace indicated that he was having computer problems, but that he should be able to have the report filed in a couple of days.

**Additional Remarks:** The above number is his cell number.

**Analyst:** Alan Shook

**Branch:** Compliance

**AF#:**

## Communication Log

Date/Time: 12/06/2002 01:30 PM

ID: C00355388

Name: NATIONAL ITALIAN AMERICAN POLITICAL  
ACTION COMMITTEE

Phone: (610) 660-7683

E-Mail Address:

Candidate:

Type: Phone Call

Contact: Anthony Mallace

Title:

Communications Category Type:

**Summary:** Mr. Mallace identified himself as the new treasurer for this committee. He called to discuss the committee's most recent administrative fines, AF #628 (Q1 2002) and AF #691 (Q2 2002). He asked if the only recourse left for AF #628 is to file a petition for the U.S. District Court in challenging the final determination for the administrative fine. I acknowledged that he was correct. I stated that AF #691 can still be challenged with the Commission's Office of Administrative Review since the deadline for the challenge is on 12/8/02. I stated that I will transfer his call to OAR after we have finished our discussion.

Mr. Mallace also asked what report was filed last and whether any paper filed reports were filed when the committee should have been filing those reports electronically. I answered his questions, however, I reminded him that these type of questions should be referred to his reports analyst, Erik Koeppen.

**Additional Remarks:**

Analyst: Alice Kang

Branch: Compliance

AF#:

## DECLARATION OF PATRICIA CARMONA

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission") In my capacity as Chief of the Compliance Branch, I oversee the research conducted with regard to the Administrative Fine Program I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters
2. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to the National Italian American Political Action Committee:
  - A) Prior Notice dated March 22, 2004 referencing the 2004 April Quarterly Report;
  - B) Non-Filer Mailgram dated May 5, 2004 referencing the 2004 April Quarterly Report;
  - C) Reason-to-Believe Mailgram dated June 15, 2004, referencing the 2004 April Quarterly Report.
3. I hereby certify that I have searched the Commission's public records and find that the National Italian American Political Action Committee filed the 2004 April Quarterly Report with the Commission on June 17, 2004.
4. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on the 3<sup>rd</sup> day of November, 2004.



Patricia Carmona  
Chief, Compliance Branch  
Reports Analysis Division  
Federal Election Commission

# QUARTERLY REPORT NOTICE

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## FEDERAL ELECTION COMMISSION

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**PARTIES AND PACS**

March 22, 2004

**REPORTING DATES**

<b>REPORT</b>	<b>REPORTING PERIOD<sup>1</sup></b>	<b>REG./CERT. &amp; OVERNIGHT</b>	<b>FILING</b>
		<b>MAILING DATE<sup>2</sup></b>	<b>DATE</b>
April Quarterly	01/01/04 - 03/31/04	04/15/04	04/15/04

### WHO MUST FILE

All Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) filing on a quarterly basis must file a Quarterly Report in April. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

Recent changes to the law require certain party committees to file monthly reports (quarterly reporting is no longer an option for these committees). See the January 2004 issue of the *Record*, which can be found on the FEC web site at <http://www.fec.gov/pages/record.htm> for more information.

**NOTE:** A recent legislative change allows committees to file reports using overnight mail on the same terms as registered/certified mail. (See footnote 2).

### PRE-ELECTION REPORTING

Committees that make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. For the pre-election reporting guidelines, see the January 2004 *Record*, which can be found on the FEC web site at <http://www.fec.gov/pages/record.htm>.

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<sup>1</sup>These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

<sup>2</sup>Quarterly reports sent by registered or certified mail must be postmarked by the mailing date. Committees should keep the mailing receipt with its postmark as proof of filing. If using overnight mail, the delivery service must receive the report by the mailing date. "Overnight mail" means an overnight service with an on-line tracking system. Quarterly reports filed by any other means must be received by the Commission (or Secretary of the Senate for committees supporting only Senate candidates) by the filing date.

(over)

**48- AND 24-HOUR REPORTS ON INDEPENDENT EXPENDITURES**

Any PAC or Party Committee that makes independent expenditures in connection with an election may also have to file 48-hour or 24-hour reports. The 48-hour reporting requirement will be triggered each time the committee makes independent expenditures aggregating \$10,000 or more between January 1<sup>st</sup> and the 20<sup>th</sup> day before the election. The 24-hour reporting requirement will be triggered each time the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election. See 11 CFR 104.4.

These reports are *not* required when a Party Committee or PAC makes a contribution directly to a candidate. For a state-by-state chart of 48- and 24-hour reporting periods, visit the FEC web site at [http://www.fec.gov/pages/charts\\_ie\\_dates.htm](http://www.fec.gov/pages/charts_ie_dates.htm).

**COMPLIANCE**

- Treasurers of political committees are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time.
- Under the Administrative Fine Program, political committees and their treasurers who fail to file their reports on time may be subject to civil money penalties up to \$16,000 (or more for repeat late- and non-filers). For additional information, see the enclosed handout entitled, "Administrative Fine Program" and visit the FEC web site at <http://www.fec.gov/adminfines1.html>.
- In addition, political committees that file illegible reports or use non-FEC forms (except for FEC-approved, computer-generated forms) will be required to refile their reports.
- Electronic filers who instead file on paper or submit an electronic report (either by direct transmission or on 3.5" diskette) that does not pass the validation test will be considered non-filers and may be subject to enforcement actions (including administrative fines).

**ELECTRONIC FILING**

Political committees that receive contributions or make expenditures in excess of \$50,000 in a calendar year, or that expect to do so, must submit their reports electronically. For additional information, review the enclosed handout entitled "Electronic Filing," call the FEC's Electronic Filing office at (800) 424-9530 or (202) 694-1642, and visit our web site at <http://www.fec.gov/elecfil/electron.html>.

**CHANGE IN FILING FREQUENCY**

Committees able to change their reporting schedule (for example, from quarterly to monthly) who wish to do so must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequency no more than once per calendar year.

24038411235

**WESTERN  
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CONFIRMATION OF MAILGRAM TO VINCENT M. LASERSA CPA MJA  
NATIONAL ITALIAN AMERICAN POLITICAL ACTI  
1205 LOCUST ST  
PHILADELPHIA PA 19107-5457

JENNIFER S. GIBELLI  
FEDERAL ELECTION COMMISSION  
999 E ST NW  
WASHINGTON DC 20463

MAY 5, 2004

IDENTIFICATION NUMBER: C00355388

REFERENCE: APRIL QUARTERLY (01/01/2004 - 03/31/2004)

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORTS OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATES FOR THESE REPORTS.

IT IS IMPORTANT THAT YOU FILE THESE REPORTS IMMEDIATELY WITH THE FEDERAL ELECTION COMMISSION, 999 E STREET, N.W., WASHINGTON, D.C. 20463. A COPY OF THE REPORTS OR RELEVANT PORTIONS MUST ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER UNLESS THE STATE IS EXEMPT FROM THE FEDERAL REQUIREMENT TO RECEIVE AND MAINTAIN PAPER COPIES.

THE FAILURE TO TIMELY FILE THESE REPORTS MAY RESULT IN CIVIL MONEY PENALTIES, AN AUDIT OR LEGAL ENFORCEMENT ACTION. THE CIVIL MONEY PENALTY CALCULATION FOR LATE REPORTS DOES NOT INCLUDE A GRACE PERIOD AND BEGINS ON THE DAY FOLLOWING THE DUE DATE FOR THE REPORT.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT ALAN SHOCK ON OUR TOLL FREE NUMBER (800)424-9930. OUR LOCAL NUMBER IS (202)694-1130.

SINCERELY,

JOHN D. GIBSON  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

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CONFIRMATION OF CMGM

WESTERN UNION COMMERCIAL SERVICES  
TO: VINCENT M LASORSA CPA MBA  
NATIONAL ITALIAN AMERICAN POLITICAL ACTI  
1205 LOCUST ST  
PHILADELPHIA PA 19107-5457

FEDERAL ELECTION COMMISSION  
DAYNA BROWN  
999 E ST NW # 709  
WASHINGTON DC 20463

JUNE 15, 2004

VINCENT M LASORSA CPA MBA  
NATIONAL ITALIAN AMERICAN POLITICAL ACTI  
1205 LOCUST STREET  
PHILADELPHIA PA 19107

C00355388  
AF#: 1130

DEAR VINCENT M LASORSA CPA MBA:

THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED ("THE ACT"), REQUIRES THAT YOUR COMMITTEE FILE AN APRIL QUARTERLY REPORT OF RECEIPTS AND DISBURSEMENTS IN A CALENDAR YEAR DURING WHICH THERE IS A REGULARLY SCHEDULED ELECTION. THIS REPORT, COVERING THE PERIOD THROUGH MARCH 31ST, SHALL BE FILED NO LATER THAN APRIL 15TH. 2 U.S.C. 434(A). YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT. RECORDS AT THE FEDERAL ELECTION COMMISSION ("FEC") INDICATE THAT THIS REPORT WAS NOT FILED WITHIN THIRTY (30) DAYS OF THE DUE DATE. YOU SHOULD FILE THIS REPORT IF YOU HAVE NOT ALREADY DONE SO.

THE ACT WAS FURTHER AMENDED IN 1999 TO PERMIT THE FEC TO IMPOSE CIVIL MONEY PENALTIES FOR VIOLATIONS OF THE REPORTING REQUIREMENTS OF 2 U.S.C. 434(A). 2 U.S.C. 437G(A)(4). ON 06/10/2004, THE FEC FOUND THAT THERE IS REASON TO BELIEVE ("RTB") THAT NATIONAL ITALIAN AMERICAN POLITICAL ACTI AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) BY FAILING TO FILE TIMELY THIS REPORT ON OR BEFORE APRIL 15TH. BASED ON THE FEC'S SCHEDULES OF CIVIL MONEY PENALTIES AT 11 C.F.R. 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT THE RTB STAGE IS \$2475. IT IS DUE BY 07/20/2004 AND IS BASED ON THESE FACTORS:

ELECTION SENSITIVITY OF REPORT: NOT ELECTION SENSITIVE  
LEVEL OF ACTIVITY: \$40993  
NUMBER OF DAYS LATE: NOT FILED  
NUMBER OF PREVIOUS CIVIL MONEY PENALTIES ASSESSED: 7

TO PAY THE CALCULATED CIVIL MONEY PENALTY


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TO PAY THE CALCULATED CIVIL MONEY PENALTY, SEND THE ENCLOSED REMITTANCE AND YOUR PAYMENT TO THE FEC AT THE ADDRESS ON PAGE 3. UPON RECEIPT OF YOUR PAYMENT, THE FEC WILL SEND YOU A FINAL DETERMINATION LETTER.

TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY

TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY, YOU MUST SUBMIT A WRITTEN RESPONSE, INCLUDING THE AF# FOUND ON PAGE ONE, TO THE FEC'S OFFICE OF ADMINISTRATIVE REVIEW, 999 E STREET, NW, WASHINGTON, DC 20463. YOUR RESPONSE MUST BE RECEIVED BY 07/20/2004. YOUR WRITTEN RESPONSE MUST INCLUDE THE REASON(S) WHY YOU ARE CHALLENGING THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY. THE FEC WILL ONLY CONSIDER CHALLENGES THAT ARE BASED ON A FACTUAL ERROR, MISCALCULATION OF THE CALCULATED CIVIL MONEY PENALTY BY THE FEC, OR THE EXISTENCE OF EXTRAORDINARY CIRCUMSTANCES THAT PERSISTED FOR MORE THAN 48 HOURS THAT WERE BEYOND YOUR CONTROL AND PREVENTED YOU FROM FILING THE REPORT IN A TIMELY MANNER. YOUR RESPONSE MUST INCLUDE THE FACTUAL BASIS SUPPORTING THE REASON(S) AND SUPPORTING DOCUMENTATION. THE FEC STRONGLY ENCOURAGES THAT DOCUMENTS BE SUBMITTED IN THE FORM OF AFFIDAVITS OR DECLARATIONS. EXAMPLES OF CIRCUMSTANCES THAT WILL NOT BE CONSIDERED EXTRAORDINARY INCLUDE, BUT ARE NOT LIMITED TO, NEGLIGENCE, PROBLEMS WITH VENDORS OR CONTRACTORS, STAFF ILLNESS, COMPUTER FAILURES AND SIMILAR CIRCUMSTANCES. 11 C.F.R. 111.35(B)(1)(III) AND (4).

YOUR FAILURE TO RAISE AN ARGUMENT IN A TIMELY FASHION DURING THE ADMINISTRATIVE PROCESS SHALL BE DEEMED A WAIVER OF YOUR RIGHT TO PRESENT SUCH ARGUMENT IN A PETITION TO THE DISTRICT COURT UNDER 2 U.S.C. 437G. 11 C.F.R. 111.38.

IF YOU INTEND TO BE REPRESENTED BY COUNSEL, PLEASE ADVISE THE OFFICE OF ADMINISTRATIVE REVIEW. YOU SHOULD PROVIDE, IN WRITING, THE NAME, ADDRESS AND TELEPHONE NUMBER OF YOUR COUNSEL AND AUTHORIZE COUNSEL TO RECEIVE NOTIFICATIONS AND COMMUNICATIONS RELATING TO THIS CHALLENGE AND IMPOSITION OF THE CALCULATED CIVIL MONEY PENALTY.

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A CHALLENGE

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A WRITTEN RESPONSE, THE FEC WILL ASSUME THAT THE PRECEDING FACTUAL ALLEGATIONS ARE TRUE AND MAKE A FINAL DETERMINATION THAT NATIONAL ITALIAN AMERICAN POLITICAL ACTI AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) AND ASSESS A CIVIL MONEY PENALTY.

UNPAID CIVIL MONEY PENALTIES ASSESSED THROUGH THE ADMINISTRATIVE FINE REGULATIONS WILL BE SUBJECT TO THE DEBT COLLECTION ACT OF 1982("DCA")AS AMENDED BY THE DEBT COLLECTION IMPROVEMENT ACT OF 1996, 31 U.S.C. 3701 ET SEQ. THE FEC MAY TAKE ANY AND ALL APPROPRIATE ACTION AUTHORIZED AND REQUIRED BY THE DCA, AS AMENDED, INCLUDING TRANSFER TO THE U.S. DEPARTMENT OF THE TREASURY FOR COLLECTION. 11 C.F.R. 111.45.

THIS MATTER WAS GENERATED BASED ON INFORMATION ASCERTAINED BY THE FEC IN THE NORMAL COURSE OF CARRYING OUT ITS SUPERVISORY RESPONSIBILITIES. 2 U.S.C. 437G(A)(2). IT WILL REMAIN CONFIDENTIAL IN ACCORDANCE WITH 2 U.S.C. 437G(A)(4)(B) AND 437G(A)(12)(A) UNTIL IT IS PLACED ON THE PUBLIC RECORD IN ACCORDANCE WITH 11 C.F.R. 111.42, UNLESS YOU NOTIFY THE FEC IN WRITING THAT YOU WISH THE



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MATTER TO BE MADE PUBLIC.

ADDITIONAL INFORMATION ON THE FEC'S ADMINISTRATIVE FINE PROGRAM, INCLUDING THE FINAL REGULATIONS, IS LOCATED AT THE FEC'S WEBSITE AT WWW.FEC.GOV. IF YOU HAVE QUESTIONS REGARDING THE PAYMENT OF THE CALCULATED CIVIL MONEY PENALTY, PLEASE CONTACT DAYNA C. BROWN IN THE REPORTS ANALYSIS DIVISION AT OUR TOLL FREE NUMBER (800)424-9530 (PRESS 1, THEN PRESS 2) OR (202)694-1130. IF YOU HAVE QUESTIONS REGARDING THE SUBMISSION OF A CHALLENGE, PLEASE CONTACT THE OFFICE OF ADMINISTRATIVE REVIEW AT OUR TOLL FREE NUMBER (800)424-9530 (PRESS 0, THEN EXT. 1660) OR (202)694-1660.

SINCERELY,

BRADLEY A. SMITH  
CHAIRMAN

\* \* \* \* \*  
**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 C.F.R. 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT RTB IS \$2475 FOR THE 2004 APRIL QUARTERLY REPORT.

PLEASE MAIL THIS REMITTANCE WITH A CHECK OR MONEY ORDER MADE PAYABLE TO THE FEDERAL ELECTION COMMISSION TO THE FOLLOWING ADDRESS:  
FEDERAL ELECTION COMMISSION  
P.O. BOX 952182  
ST. LOUIS, MO 63195-2182

IF YOU CHOOSE TO SEND YOUR REMITTANCE AND PAYMENT BY COURIER OR OVERNIGHT DELIVERY, PLEASE USE THIS ADDRESS:  
U.S. BANK - GOVERNMENT LOCKBOX  
FEC #952182  
1005 CONVENTION PLAZA  
ST. LOUIS, MO 63101

THE REMITTANCE AND YOUR PAYMENT ARE DUE BY 07/20/2004. UPON RECEIPT OF YOUR REMITTANCE AND PAYMENT, THE FEC WILL SEND YOU A FINAL DETERMINATION LETTER.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT  
-----

FOR: NATIONAL ITALIAN AMERICAN POLITICAL ACTI

FE ID#: C00355388

AF#: 1130

PAYMENT DUE DATE: 07/20/2004

PAYMENT AMOUNT DUE: \$2475

FEC OFFICE OF  
ADMIN REVIEW

2005 FEB 22 P 1:53



FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

February 22, 2005

**MEMORANDUM**

TO: Shawn Woodhead Werth  
Reviewing Officer  
Office of Administrative Review

THROUGH: John Gibson *[Signature]*  
Assistant Staff Director  
Reports Analysis Division

Debbie Chacona *[Signature]*  
Branch Chief, Party/Non-Party  
Reports Analysis Division

FROM: Patricia Carmona *[Signature]*  
Branch Chief, Compliance  
Reports Analysis Division

SUBJECT: Response to Request for Supplemental Information  
AF #1130 – National Italian American Political Action Committee  
and Vincent M. Lasorsa, as Treasurer.

Please see the attached record of telephone conversations between former Campaign Finance Analyst, Erik Koeppen and Anthony Mallace of the National Italian American PAC. These telephone conversations highlight instances in the past when RAD provided the Committee specific assistance in the filing of reports.

Please note that RAD has no record of any telephonic conversations held with the Committee concerning the filing of the 2004 April Quarterly Report.

If you have any further questions, please contact me at 694-1150. Thank you.

Attachments (3)

## Communication Log

Date/Time: 01/10/2003 12:22 PM

ID: C00355388

Name: NATIONAL ITALIAN AMERICAN POLITICAL  
ACTION COMMITTEE

Phone: (215) 355-5429

E-Mail Address:

Candidate:

Type: Phone Call

Contact: Anthony Mallace

Title: Treasurer

Communications Category Type:

**Summary:** Anthony called to find out how to access their reports online. I showed him our webpage and walked him through getting the PDF version for each report. I also told him that since they are going to have to file all of their reports anyway that they should go ahead and just file every single report from the MY 2001 electronically. I told him that if he had problems doing this I would walk him through the process.

**Additional Remarks:**

Analyst: Erik Koeppen

Branch: Party/Non-Party

AF#:

## Communication Log

Date/Time: 01/10/2003 03:13 PM

ID: C00355388

Name: NATIONAL ITALIAN AMERICAN POLITICAL  
ACTION COMMITTEE

Phone: (215) 355-5429

E-Mail Address:

Candidate:

Type: Phone Call

Contact: Anthony Mallace

Title:

Communications Category Type:

**Summary:** Anthony called because he couldn't get started inputting their report information into FECFILE 4. I walked him through the process of creating reports, how to open an existing committee file, how to input a beginning cash on hand through a "dummy report," and finally how to input receipts and disbursements. I told him to call me if he had any more information.

**Additional Remarks:**

Analyst: Erik Koeppen

Branch: Party/Non-Party

AF#:

## Communication Log

Date/Time: 01/07/2004 09:33 AM

ID: C00355388

Name: NATIONAL ITALIAN AMERICAN POLITICAL  
ACTION COMMITTEE

Phone: (215) 355-5429

E-Mail Address:

Candidate:

Type: Phone Call

Contact: Anthony Mallace

Title: Treasurer

Communications Category Type:

**Summary:** Anthony called to wonder why we haven't received their reports for 2003. I asked him to open up FECFILE to their reports page. Once there he said that all of the 2003 reports were still open and that they weren't closed even though he thought they were. I told him to right click on each report that was open (or in black) and put today's date in the space provided. He did this which then closed all of their reports. Once he did this I told him how to upload each report. Once he got to the point where you put in a password he asked how to get a new password in case he lost the other one. I told him that we have a place on our website that details exactly how to request a new password. He thanked me for my time and said that he must have missed some steps last time that kept him from uploading. I told him to please call me if they need any more assistance.

**Additional Remarks:**

Analyst: Erik Koeppen

Branch: Party/Non-Party

AF#:



FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

April 22, 2005

**MEMORANDUM**

TO: SHAWN WOODHEAD WERTH  
REVIEWING OFFICER  
OFFICE OF ADMINISTRATIVE REVIEW

FROM: JEFF CHUMLEY *JWC*  
MANAGER, SYSTEMS ANALYSIS AND DESIGN BRANCH  
INFORMATION TECHNOLOGY DIVISION

SUBJECT: AF# 1130 – NATIONAL ITALIAN AMERICAN POLITICAL  
ACTION COMMITTEE AND VINCENT M. LASORSA,  
AS TREASURER (C00355388)

In response to your request dated August 17, 2004, the Electronic Filing Office (EFO) provides the following information regarding the respondent's filing of 2004 April Quarterly Report:

December 6, 2002: FECFile was downloaded from the FEC website. The download function requests that the user provide contact information. On this date the name Anthony N. Mallace, CPA, JD was provided.

January 10, 2003: FECFile was downloaded from the FEC website. The contact name provided was Anthony N. Mallace, CPA, JD.

April 10, 2003: FECFile was downloaded from the FEC website. The contact name provided was Anthony N. Mallace, CPA, JD.

July 9, 2003: The EFO received a faxed Password Request Letter from the committee. FECFile was downloaded from the FEC website. The contact name provided was Anthony N. Mallace, CPA, JD.

July 10, 2003: A password was assigned to Mr. Anthony Mallace.

April 16, 2004: The EFO notified the committee by email that they had failed to file their 2004 April Quarterly Report. The FEC server mail log, which stores the email address provided by the filer, shows that the email was sent to [atty\\_cpa@netzero.com](mailto:atty_cpa@netzero.com).

April 22, 2004: Mr. Anthony Mallace called the EFO requesting assistance upgrading FECFile. Ms. Eliza Green of technical support provided upgrade instructions to Mr. Mallace.

May 13, 2004: The committee downloaded FECFile from the FEC website. The contact name provided was Anthony N. Mallace, CPA, JD. The same day, Mr. Anthony Mallace called technical support and spoke with Mr. Dustin Tull. Mr. Mallace explained that the hard drive that contained the committee's data file (\*.dcf) had crashed a few months ago and that the computer was out for repair. He further stated that he had installed FECFile on another computer and needed to file his 2004 April Quarterly Report. Mr. Tull suggested to Mr. Mallace that he contact the entity repairing the computer to retrieve the data file, and in the event that the data file could not be salvaged, to rebuild his data file. Mr. Tull guided Mr. Mallace to where on the FEC website he could find and download instructions on how to rebuild his data file. Mr. Tull walked Mr. Mallace through downloading the instructions (for reconstructing his data file). Mr. Mallace stated he understood what needed to be done.

May 21, 2004: FECFile was downloaded from the FEC website. The contact name provided was Anthony N. Mallace, CPA, JD.

June 17, 2004: Mr. Anthony Mallace left a voice message for Mr. Ken Lally of the EFO. Mr. Mallace's message was not specific, only that he had been referred by the Audit Division and that he had a filing problem. Mr. Lally called Mr. Mallace back and left a voice message to call the EFO. Later in the morning, the EFO received a Password Request Letter faxed from the committee. Mr. Dustin Tull of tech support called Mr.

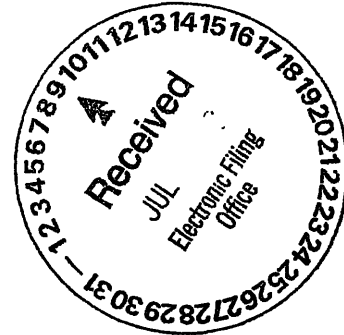
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Anthony N. Mallace, CPA, J.D.  
109 West Merchant Street  
Audubon, NJ 08106  
Tel. (856) 546-1800  
Fax (856) 546-0142  
e-mail: [cpa@jersey.net](mailto:cpa@jersey.net)

July 9, 2003

Federal Election Commission  
Attention: Electronic Filing Office  
Room 419



Dear Sir or Madam:

This document serves Assets an official password request for the purpose of filing electronic reports for The National Italian American Political Action Committee.

The FEC-assigned 9-digit Committee ID for this Committee is C00355388.

You may contact me at (856) 546-1800.

I represent that I am the duly appointed treasurer and have authority Assets such to sign FEC reports for the above committee.

Sincerely

A handwritten signature in cursive script that reads "Anthony N. Mallace".

Anthony N. Mallace, CPA, J.D.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

VIA OVERNIGHT DELIVERY

April 28, 2005

Vincent M. LaSorsa, CPA, MBA, as Treasurer  
National Italian American Political Action Committee  
1205 Locust Street  
Philadelphia, PA 19107

C00355388

AF# 1130

Dear Mr. LaSorsa:


On June 10, 2004, the Federal Election Commission ("Commission") found reason to believe ("RTB") that the National Italian American Political Action Committee and you, as Treasurer ("respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2004 April Quarterly Report. The Commission also made a preliminary determination that the civil money penalty was \$2,475 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing Mr. Anthony Mallace's written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination in this matter. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 999 E Street, NW, Washington, DC 20463. As a result of the anthrax threat in the Washington, DC area, US Postal Service mail delivery to federal agencies, including the Commission, has been interrupted. Until regular mail delivery resumes, you may also file your written response with the Commission Secretary via facsimile (202-208-3333) or by courier at the same address (if you use an overnight delivery service, please use zip code 20004 instead of zip code 20463). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1660 if you have any questions.

Sincerely,

  
Jennifer H. Boyd  
Reviewing Analyst  
Office of Administrative Review

Attachment



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

VIA OVERNIGHT DELIVERY

April 28, 2005

Anthony N. Mallace, CPA, JD, as Treasurer  
National Italian American Political Action Committee  
1205 Locust Street  
Philadelphia, PA 19107

C00355388

AF# 1130

Dear Mr. Mallace:

On June 10, 2004, the Federal Election Commission ("Commission") found reason to believe ("RTB") that the National Italian American Political Action Committee and Vincent M. LaSorsa, as Treasurer ("respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2004 April Quarterly Report. The Commission also made a preliminary determination that the civil money penalty was \$2,475 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination in this matter. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 999 E Street, NW, Washington, DC 20463. As a result of the anthrax threat in the Washington, DC area, US Postal Service mail delivery to federal agencies, including the Commission, has been interrupted. Until regular mail delivery resumes, you may also file your written response with the Commission Secretary via facsimile (202-208-3333) or by courier at the same address (if you use an overnight delivery service, please use zip code 20004 instead of zip code 20463). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1660 if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jennifer H. Boyt", is written over the typed name.

Jennifer H. Boyt  
Reviewing Analyst

Office of Administrative Review

Attachment



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

*Werth*  
RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2005 APR 27 P 3:51

April 28, 2005

**MEMORANDUM**

**SENSITIVE**

TO: THE COMMISSION

THROUGH: JAMES A. PEHRKON  
STAFF DIRECTOR *[Signature]*

ANTHONY P. SCARDINO *AS*  
DEPUTY STAFF DIRECTOR *[Signature]*

FROM: SHAWN WOODHEAD WERTH *[Signature]*  
REVIEWING OFFICER  
OFFICE OF ADMINISTRATIVE REVIEW

SUBJECT: AF# 1130 - NATIONAL ITALIAN AMERICAN POLITICAL  
ACTION COMMITTEE AND VINCENT M. LaSORSA, CPA,  
MBA, AS TREASURER (C00355388)

The attached Reviewing Officer Recommendation is being circulated on an informational basis. A copy was also sent to respondents in accordance with 11 C.F.R. § 111.36(f). The respondents may file with the Commission Secretary a written response within 10 days of transmittal of the recommendation.

After the 10 day period, the Reviewing Officer Recommendation and the respondents' written response, if any, will be circulated to the Commission to make a final determination.

Attachment



FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

April 28, 2005

**REVIEWING OFFICER RECOMMENDATION  
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 1130 – National Italian American Political Action Committee and Vincent M. LaSorsa, CPA, MBA, as Treasurer (C00355388)

On June 10, 2004, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that the National Italian American Political Action Committee and Vincent M. LaSorsa, CPA, MBA, as Treasurer ("the respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2004 April Quarterly Report. The Commission also made a preliminary determination that the civil money penalty was \$2,475 based on the schedule of penalties at 11 C.F.R. § 111.43. On June 15, 2004, the Reports Analysis Division ("RAD") sent notification to the respondents of the Commission's finding and civil money penalty calculated at RTB.

**Respondents' Response**

On July 20, 2004, the Commission received the written response and supporting documentation ("challenge") from Anthony N. Mallace on behalf of the respondents. Mr. Mallace is challenging the RTB civil money penalty because "given the efforts made and successfully implemented to ensure current and future compliance," in addition to "all fines previously levied" against the respondents, "we respectfully request that the Commission consider the totality of the circumstances and abate this penalty." (Emphasis in original.)<sup>1</sup>

Mr. Mallace explains that the previous "treasurer did not get involved to the extent that I am now involved in making sure that the books and records are maintained on a current basis." Indeed, "the financial information about all funds received by the entity has historically been received and maintained by an independent entity which acted as a fund raiser." Mr. Mallace changed the previous treasurer's policy and began receiving "financial information on a monthly basis ... to ensure that [it] is maintained current on an ongoing basis." These "recently implemented procedures" will "ensure future timely filings of all required reports," as "the circumstances which previously existed and which resulted in late filings will not recur."

Mr. Mallace states that

[t]he difficulties that I encountered as the new treasurer ... were further compounded by several computer problems, including the complete destruction of the data base of previous quarterly filings. While computer failures are not in and of themselves deemed sufficient cause to excuse a filing failure, those difficulties along with the need to implement procedures to overcome internal control and procedural weaknesses of the previous treasurer resulted in circumstances that did not allow us to finalize the reports on time.

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<sup>1</sup> Mr. Mallace was designated as Treasurer on June 17, 2004.

At the same time that our data base was lost, we were unable to receive timely assistance from the technical advisor assigned to us. Subsequently, we did receive assistance and were able to comply once our data base was retrieved. We have recently been assigned to a new technical advisor because our previous advisor had left the FEC. As soon as the data base was retrieved, the report was immediately filed.

The Treasurer "indicate[s that] the new executive committee has worked diligently to overcome ... weaknesses" which include old methods of maintaining financial information, computer problems, data base destruction, assignment of a "new technical advisor," and lack of paid staff and timely assistance. He states that overcoming these weaknesses will "ensure" that reports will not be late in the future, "beginning with the ... filing which was due on July 15, 2004." The Treasurer also states that "the computer system ... has been upgraded substantially in order to provide the computer capabilities that will avoid future computer failures."

The Treasurer includes as supporting documentation a copy of the RTB notification dated June 15, 2004.

#### **Supplemental Requests and Responses**

The respondents indicate that they did not "receive timely assistance from the technical advisor assigned to us. Subsequently, we did receive assistance and were able to comply once our data base was retrieved." As a result, OAR sent supplemental requests to the Information Technology Division ("ITD") on August 17, 2004 and to RAD on October 25, 2004.

In its October 25, 2004 request, OAR asked RAD for any information regarding conversations between the respondents and RAD staff about the issues raised in the challenge. In his February 22, 2005 response, the Assistant Staff Director for RAD provides records of telephone conversations ("telecons") "between former Campaign Finance Analyst, Erik Koeppen and Anthony Mallace" which "highlight instances in the past when RAD provided the Committee specific assistance in the filing of reports. Please note that RAD has no record of any telephonic conversations held with the Committee concerning the filing of the 2004 April Quarterly Report."

In the first telecon, Erik Koeppen states that, on January 10, 2003, Mr. Mallace called and asked

how to access their reports online. I showed him our webpage and walked him through getting the PDF version for each report. I also told him that since they are going to have to file all of their reports anyway that they should go ahead and just file every single report from the [Mid-Year] 2001 electronically. I told him that if he had problems doing this I would walk him through the process.

That same day, Mr. Mallace called Mr. Koeppen again because he couldn't get started inputting ... report information into FECFILE 4. I walked him through the process of creating reports, how to open an existing committee file, how to input a beginning cash on hand through a "dummy report," and finally how to input receipts and disbursements....

On January 7, 2004, Mr. Koeppen received another call from Mr. Mallace, who

wonder[ed] why we haven't received their reports for 2003. I asked him to open up FECFILE to their reports page. Once there he said that all of the 2003 reports were still open and that they [weren't] closed even though he [thought] they were. I told him to right click on each report that was open (or in black) and put today's date in the space provided. He did this which then closed all of their reports. Once he did this I told him how to upload each report. Once he got to the point where you put in a password he asked how to get a new password in case he lost the other one. I told him that we have a place on our website that details exactly how to request a new password. He thanked me for my time and said that he must have missed some steps last time that kept him from uploading. I told him to please call me if they need any more assistance.

In its August 17, 2004 request, OAR asked ITD for any information regarding the issue raised in the challenge. In his April 22, 2005 response, the Manager of the Systems Analysis and Design Branch in ITD states that the Electronic Filing Office ("EFO") logs show that, on December 6, 2002, "FECFile was downloaded from the FEC website. The download function requests that the user provide contact information. On this date the name Anthony N. Mallace, CPA, JD was provided." On January 10 and April 10, 2003, "FECFile was downloaded ... [and the] contact name provided was Anthony N. Mallace, CPA, JD."

The ITD Manager states that on July 9, 2003, the "EFO received a faxed Password Request Letter from the committee. FECFile was downloaded from the FEC website. The contact name provided was Anthony N. Mallace, CPA, JD." On July 10, a "password was assigned to Mr. Anthony Mallace." On April 16, 2004, the "EFO notified the committee by email that they had failed to file their 2004 April Quarterly Report. The FEC server mail log, which stores the email address provided by the filer, shows that the email was sent to atty\_cpa@netzero.com." On April 22, 2004, "Mr. Anthony Mallace called the EFO requesting assistance upgrading FECFile. Ms. Eliza Green ... provided upgrade instructions to Mr. Mallace."

The ITD Manager states that, on May 13, 2004, the committee downloaded FECFile from the FEC website. The contact name provided was Anthony N. Mallace, CPA, JD. The same day, Mr. Anthony Mallace called ... and spoke with Mr. Dustin Tull. Mr. Mallace explained that the hard drive that contained the committee's data file (\*.dcf) had crashed a few months ago and that the computer was out for repair. He further stated that he had installed FECFile on another computer and needed to file his 2004 April Quarterly Report. Mr. Tull suggested to Mr. Mallace that he contact the entity repairing the computer to retrieve the data file, and in the event that the data file could not be salvaged, to rebuild his data file. Mr. Tull guided Mr. Mallace to where on the FEC website he could find and download instructions on how to rebuild his data file. Mr. Tull walked Mr. Mallace through [the] downloaded ... instructions (for reconstructing his data file). Mr. Mallace stated he understood what needed to be done.

On May 21, 2004, the ITD Manager states that "FECFile was downloaded from the FEC website. The contact name provided was Anthony N. Mallace, CPA, JD." On June 17, 2004,

Mr. Anthony Mallace left a voice message for Mr. Ken Lally .... Mr. Mallace's message was not specific, only that he had been referred by the Audit Division and that he had a filing problem. Mr. Lally called Mr. Mallace back and left a voice message to call the EFO. Later in the morning, the EFO received a Password Request Letter faxed from the committee. Mr. Dustin Tull ... called Mr. Mallace and assigned him a password.

The ITD Manager states that, "[l]ater that afternoon, Mr. Mallace called Mr. Lally ... and explained that his 2004 April Quarterly Report had not been filed, was delinquent, he had forgotten his password, and that he had been working closely with the FEC Audit Division."<sup>2</sup> During that conversation, "Mr. Lally assisted Mr. Mallace to create and upload an amended Statement of Organization, correct several name related validation errors (caused by faulty data entry), and upload his 2004 April Quarterly Report."

Two telecons accompanied RAD's Declaration. In a telecon dated December 6, 2002, Alice Kang states that

Mr. Mallace identified himself as the new treasurer for this committee. He called to discuss the committee's most recent administrative fines, AF #628 ([April Quarterly Report] 2002) and AF #691 ([July Quarterly Report] 2002). He asked if the only recourse left for AF #628 is to file a petition [in] the U.S. District Court in challenging the final determination for the administrative fine. I acknowledged that he was correct. I stated that AF #691 can still be challenged with the Commission's Office of Administrative Review since the deadline for the challenge is on 12/8/02. I stated that I will transfer his call to OAR after we have finished our discussion.

Mr. Mallace also asked what report was filed last and whether any paper filed reports were filed when the committee should have been filing those reports electronically. I answered his questions, however, I reminded him that these type[s] of questions should be referred to his reports analyst, Erik Koeppen.

In the second telecon dated May 19, 2004 and provided with RAD's declaration, Alan Shook states that RAD's Assistant Staff Director authorized him to call the committee "to encourage them to file their [April Quarterly] report, since they had 7 previous violations in the [Administrative Fine] program, and of late had paid all but one. Mr. Mallace indicated that he was having computer problems, but that he should be able to have the report filed in a couple of days."

### **Analysis of Challenge**

The 2004 April Quarterly Report was electronically filed on June 17, 2004, 63 days late.

The Federal Election Campaign Act ("Act") requires that quarterly reports must be filed by the treasurer of a political action committee no later than the 15<sup>th</sup> day after the last day of each calendar quarter in a calendar year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i). Reports filed electronically must be received and validated by the Commission at or before 11:59 p.m., Eastern Standard/Daylight Time on the prescribed filing date to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The respondents' written response

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<sup>2</sup> The Commission approved the audit report for the 2001-2002 election cycle on January 5, 2005.



shall contain the reason(s) why they are challenging the Commission's reason to believe finding and may consist of the existence of extraordinary circumstances that were beyond the control of the respondents, were for a duration of at least 48 hours and prevented them from filing the report in a timely manner. Examples of circumstances which are not considered extraordinary include, but are not limited to, negligence, problems with a vendor or contractor, inexperience of staff, including the treasurer, computer failures and other similar circumstances. 11 C.F.R. § 111.35. The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d). Committees are required to disclose changes to the information on a previously submitted statement of organization no later than 10 days after the date of the change. 2 U.S.C. § 433(c) and 11 C.F.R. § 102.2(a)(2).

The level of activity for an unauthorized political committee means the total amount of receipts and disbursements for the period covered by the late report minus the total of transfers received from non-Federal accounts as reported on Line 18(a) and disbursements for the non-Federal share of operating expenditures attributable to allocated Federal/Non-Federal activity as reported on Line 21(a)(ii). If the report is not filed, the level of activity is the estimated level of activity. The estimated level of activity means the total amount of receipts and disbursements reported in the current two-year election cycle minus transfers received by non-Federal accounts as reported on Line 18 and minus disbursements for the non-Federal share of operating expenditures attributable to allocated Federal/non-Federal activity as reported on Line 21(a)(ii) divided by the number of reports filed to date covering the activity in the current two-year election cycle. 11 C.F.R. § 111.43(a)(2)(i)(B) and (ii)(B).

Prior Notice for the April Quarterly Report, which was sent to the respondents on March 22, 2004, states that the filing date is April 15, 2004. It also states that treasurers are responsible for the timeliness of their reports and political committees which fail to file their reports on time may be subject to administrative penalties.

According to Mr. Mallace, there were "internal control and procedural weaknesses" because the Treasurer, Mr. LaSorsa, did not maintain the Committee's "books and records ... on a current basis" and an "independent entity" received and maintained their receipts as the Committee had no paid staff. These "circumstances ... resulted in several late filings," including the late filing of the 2004 April Quarterly Report, but they should not happen again since he, Mr. Mallace, is now the Treasurer.

The Act clearly states that it is the Treasurer's responsibility to file reports in a timely manner and it is the responsibility of the respondents to provide the Commission with the name of the Treasurer and to report any change in that information no later than ten (10) days after the date of change. For most of the period during which Mr. LaSorsa was designated as the Treasurer and, therefore, responsible for the timeliness of their filings, Mr. Mallace was apparently preparing and filing the reports. While someone other than the designated Treasurer may prepare and file the reports, it is nonetheless the Treasurer's responsibility to ensure that a committee's reports are filed on time.

An examination of Commission records shows that Mr. LaSorsa was designated as Treasurer in February 2002 but Mr. Mallace was not designated as Treasurer until June 2004. Mr. Mallace, however, appears to have assumed the responsibilities of Treasurer

or at least been involved in the filing of the Committee's reports as early as December 2002, approximately 1 ½ years before the 2004 April Quarterly Report's due date.<sup>3</sup> He either identified himself as the Committee's Treasurer (as he did in his December 2002 conversation with the Compliance Analyst and his July 2003 Password Request), indicated that he was responsible for preparing and uploading the reports (as he did in his conversations in January 2003 and 2004 with the Campaign Finance Analyst), signed the Committee's reports and letters as Treasurer (as he did on the eight reports electronically filed in July 2003 and the four reports electronically filed in January and February 2004 and in the password request sent to the EFO in July 2003), or was listed as the Committee's contact (as when FECFile was downloaded in December 2002, January, April and July 2003, and May 2004). Mr. LaSorsa was the Treasurer of record when the 2004 April Quarterly Report was due, yet Mr. Mallace was still involved with the filing of the Committee's reports as he spoke with the EFO staff on three occasions in April, May, and June 2004 for help with electronic filing.

Mr. Mallace also states in the challenge that they were not able to file the report on time because of computer problems including the "complete destruction of the database" which contained the Committee's previously filed reports. Likewise, in his May 13, 2004 conversation with EFO staff, Mr. Mallace stated that his computer had crashed "a few months ago" and was with a vendor for repairs, but he had installed FECFile on another computer to file the April Quarterly Report. There is no indication in the challenge or the EFO records of the date(s) on which these events occurred.

Commission records show that the last report filed prior to April 15, 2004 was the 2003 Year End Report. Neither RAD nor the EFO have any records of telephone conversations with the respondents between February 2, 2004, when the Year End Report was electronically filed, and April 22, 2004, when Mr. Mallace spoke with Ms. Green about upgrading their FECFile electronic filing software. According to the EFO logs, Mr. Mallace did not mention during his conversation with Ms. Green that the hard drive had crashed, that the "data base was lost," or that Commission staff was either unable or unavailable to help them file the April Quarterly Report.

It is not clear why Mr. Mallace did not file the April Quarterly Report after the May 13 conversation with Mr. Tull (particularly since he said "he understood what needed to be done" after Mr. Tull explained how to access and "download instructions" from the Commission's website to "rebuild his data file" and then "walked [him] through ... reconstructing his data file" if he could not retrieve the data file from the vendor repairing their computer) or the May 19 conversation with Mr. Shook (when Mr. Shook called the respondents to stress the importance of filing the report since they already had seven previous violations).<sup>4</sup> It was not until June 17, the day after their receipt of the RTB notification, that Mr. Mallace again contacted Mr. Lally and Mr. Tull for help in

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<sup>3</sup> RAD sent Requests for Additional Information ("RFAs") to Mr. LaSorsa, on August 8, 2003 and referenced eight electronically filed reports, received in July 2003, which Mr. Mallace signed as Treasurer. Each RFA told the respondents to file an amended Statement of Organization if a new Treasurer had been appointed. The respondents did not respond to the RFAs or follow-up letters sent on August 28, 2003.

<sup>4</sup> The Committee and its Treasurer were also respondents in AF #520, AF# 575, AF# 628, AF# 691, AF# 734, AF# 931, and AF# 1025. The Commission made final determinations and assessed civil money penalties totaling \$16,550 in these seven cases.

filing the report. On that same date, Mr. Mallace submitted a second electronic filing password request, was assigned another password by Mr. Tull as "he had forgotten his password," and received help from Mr. Lally "to create and upload an amended Statement of Organization ... and upload his 2004 April Quarterly Report."

The administrative fine regulations clearly state that negligence, computer failures, and any inexperience of staff, including the Treasurer, do not constitute "extraordinary circumstances." Thus, the "crash" of their computer's hard drive, the "complete destruction of the data base," and the "need to implement procedures to overcome internal control and procedural weaknesses of the previous treasurer" are not considered extraordinary circumstances.

Under the administrative fine regulations, four criteria are used to calculate the civil money penalty. They are the level of activity, the election sensitivity, whether the report is filed late or considered not filed, and the number of previous violations. 11 C.F.R. § 111.43.

At the time of the RTB finding, the Commission had not received the April Quarterly Report; therefore, the estimated level of activity of \$40,993 was used to calculate the RTB civil money penalty. In the RTB notification, the respondents were informed of the Commission's preliminary finding and determination of the \$2,475 civil money penalty which was calculated using the \$25,000 - \$49,999.99 level of activity bracket for a report which is not filed and respondents with 7 previous violations:  $\$900 \times [1 + (.25 \times 7)]$  or \$2,475. After notification of the RTB finding and prior to submitting their challenge, the respondents filed the April Quarterly Report on June 17, 2004. It covers the period from January 1 through March 30, 2004 and discloses \$77,529 in total receipts and \$75,279 in total disbursements. This results in an actual level of activity of \$152,808. Had it been filed prior to the Commission's RTB finding, the actual level of activity on the April Quarterly Report would have been used to calculate the RTB civil money penalty. That would have resulted in an RTB civil money penalty of  $\$5,500 \times [1 + (.25 \times 7)]$  or \$15,125 based on the schedule of penalties at 11 C.F.R. § 111.43(a)(2)(iii).

The Reviewing Officer recommends that the Commission not amend its RTB finding but, instead, make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$2,475. The Reviewing Officer recommends this course of action for a number of reasons. First, the respondents were informed in the RTB notification that the proposed civil money penalty was \$2,475 as non-filers of the report and they submitted their challenge accordingly. Second, if the respondents file future reports late or not at all, their civil money penalties will include eight (8) prior violation factors. Third, correcting the RTB finding and proposed civil money penalty would entail giving the respondents another 40 days to submit a challenge based on the amended RTB finding. This would further delay resolution of this case.

The purpose of the administrative fine program provided at 2 U.S.C. § 437g(a)(4)(C) is to streamline and expedite the Commission's enforcement procedures. The Reviewing Officer believes that amending the RTB finding and proposed civil money penalty, ten (10) months after the original RTB date, to increase the civil money penalty, does not serve that purpose.

With respect to the other issues raised in the challenge (the Committee's lack of paid staff and their steps to ensure future timely filings), they do not fall within the list of defenses outlined in 11 C.F.R. § 111.35(b). The challenge presented no evidence that a factual error was made, that the civil money penalty was miscalculated at RTB or that extraordinary circumstances existed, which prevented them from filing the 2004 April Quarterly Report in a timely manner. The Reviewing Officer, therefore, recommends that the Commission make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$2,475.

#### **OAR Recommendations**

- (1) Make a final determination in AF# 1130 that the National Italian American Political Action Committee and Vincent M. LaSorsa, CPA, MBA, as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$2,475; and
- (2) Send the appropriate letter.

#### **Attachments**

Attachment 1 - Challenge Received from Respondents

Attachment 2 - Supplemental Request Sent to and Response Received from RAD

Attachment 3 - Supplemental Request Sent to and Response Received from ITD

Attachment 4 - Declaration from RAD

Attachment 5 - Staff Telecons Provided with RAD Declaration

Attachment 6 - USPS Form 3811 Domestic Return Receipt for June 15, 2004 RTB

Notification Provided with RAD Declaration

Attachment 7 - Declaration from OAR

FEC OFFICE  
ADMIN REVIEW

2004 JUL 20 P 3:33

Anthony N. Mallace, CPA, J.D.

109 West Merchant Street

Audubon, NJ 08106

Tel. (856) 546-1800

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e-mail: [atty\\_cpa@netzero.com](mailto:atty_cpa@netzero.com)

[www.mallace.com](http://www.mallace.com)

RECEIVED  
FEC MAIL  
OPERATIONS CENTER

2004 JUL 20 A 11:35

July 19, 2004

Federal Election Commission  
Office of Administrative Review  
999 E Street, N.W.  
Washington, DC 20463

Re: National Italian American Political Action Committee  
C00355388

Dear Sir or Madam ;

I am the treasurer for the above referenced entity and am writing in response to your notice of fine issued relative to the April 15, 2004 quarterly filing. (A copy of the notification letter is attached for your reference).

The entity in question has recently implemented procedures to ensure future timely filings of all required reports. As treasurer, I have undertaken to receive financial information on a monthly basis in order to ensure that all such information is maintained current on an ongoing basis. The previous treasurer did not maintain these controls. As a result, the circumstances that resulted in several late filings will not recur in the future.

With regard to the quarter at issue, the entity has no paid staff. The financial information about all funds received by the entity has historically been received and maintained by an independent entity which acted as a fund raiser. However, in previous years, the treasurer did not get involved to the extent that I am now involved in making sure that the books and records are maintained on a current basis. For this reason, I am confident that my claim that the circumstances which previously existed and which resulted in late filings will not recur. It should be noted that the July 15, 2004 quarterly filing was filed on a timely basis.

In addition, the difficulties that I encountered as the new treasurer of this political action committee were further compounded by several computer problems, including the complete destruction of the data base of previous quarterly filings. While computer failures are not in and of themselves deemed sufficient cause to excuse a filing failure, those difficulties along with the need to implement procedures to overcome internal control and procedural weaknesses of the previous treasurer resulted in circumstances that did not allow us to finalize the reports on time.

Federal Election Commission  
July 19, 2004  
Page 2

At the same time that our data base was lost, we were unable to receive timely assistance from the technical advisor assigned to us. Subsequently, we did receive assistance and were able to comply once our data base was retrieved. We have recently been assigned to a new technical advisor because our previous advisor had left the FEC. As soon as the data base was retrieved, the report was immediately filed.

As I have indicated, the new executive committee has worked diligently to overcome all of these weaknesses and beginning with the most recent filing which was due on July 15, 2004, will ensure that the entity will not be late in the future. Further, the computer system used by this Committee has been upgraded substantially in order to provide the computer capabilities that will avoid future computer failures.

This Political Action Committee has paid all fines previously levied. However, given the efforts made and successfully implemented to ensure current and future compliance, we respectfully request that the Commission consider the totality of the circumstances and abate this penalty.

If you require any additional information, please do not hesitate to contact me directly.

Thank you for your consideration.

Very truly yours,



Anthony N. Mallace, CPA, J.D.

cc: Joseph Tarantino  
Joseph Auteri

**LETTER TO FEDERAL ELECTION COMMISSION SENT BY EXPRESS MAIL**  
**ARTICLE NO. ER 367140555 US**

F.E.C. RTB  
999 E Street, NW  
Washington, DC 20463

**WESTERN  
UNION MAILGRAM**



UNITED STATES  
POSTAL SERVICE

112521000479 06/15/04  
EM161C5

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112521000479 06/15/04

CERTIFIED RETURN RECEIPT P 910 149 640  
VINCENT M LASORSA CPA MBA  
NATIONAL ITALIAN AMERICAN POLITICAL ACTI  
1205 LOCUST ST  
PHILADELPHIA PA 19107-5457

\*\*\*\*CERTIFIED\*\*\*\*

June 15, 2004

VINCENT M LASORSA CPA MBA  
NATIONAL ITALIAN AMERICAN POLITICAL ACTI  
1205 LOCUST STREET  
PHILADELPHIA PA 19107

C00355388  
AF#: 1130

Dear VINCENT M LASORSA CPA MBA:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file an April Quarterly Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled election. This report, covering the period through March 31st, shall be filed no later than April 15th. 2 U.S.C. 434(a). You were previously notified of the due date for this report. Records at the Federal Election Commission ("FEC") indicate that this report was not filed within thirty (30) days of the due date. You should file this report if you have not already done so.

The Act was further amended in 1999 to permit the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. 434(a). 2 U.S.C. 437g(a)(4). On 06/10/2004, the FEC found that there is reason to believe ("RTB") that NATIONAL ITALIAN AMERICAN POLITICAL ACTI and you, as treasurer, violated 2 U.S.C. 434(a) by failing to file timely this report on or before April 15th. Based on the FEC's schedules of civil money penalties at 11 C.F.R. 111.43, the amount of your civil money penalty calculated at the RTB stage is \$2475. It is due by 07/20/2004 and is based on these factors:

Election Sensitivity of Report: Not election sensitive  
Level of Activity: \$40993  
Number of Days Late: Not Filed  
Number of Previous Civil Money Penalties Assessed: 7

To Pay the Calculated Civil Money Penalty

PAGE 2

112521000479

**WESTERN  
UNION MAILGRAM** **UNITED STATES  
POSTAL SERVICE**

To pay the calculated civil money penalty, send the enclosed remittance and your payment to the FEC at the address on page 3. Upon receipt of your payment, the FEC will send you a final determination letter.

To Challenge the RTB Finding and/or Calculated Civil Money Penalty

To challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found on page one, to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must be received by 07/20/2004. Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty. The FEC will only consider challenges that are based on a factual error, miscalculation of the calculated civil money penalty by the FEC, or the existence of extraordinary circumstances that persisted for more than 48 hours that were beyond your control and prevented you from filing the report in a timely manner. Your response must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. Examples of circumstances that will not be considered extraordinary include, but are not limited to, negligence, problems with vendors or contractors, staff illness, computer failures and similar circumstances. 11 C.F.R. 111.35(b)(1)(iii) and (4).

Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of your right to present such argument in a petition to the district court under 2 U.S.C. 437g. 11 C.F.R. 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

**If You Do Not Pay The Calculated Civil Money Penalty or Submit a Challenge**

If you do not pay the calculated civil money penalty or submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that NATIONAL ITALIAN AMERICAN POLITICAL ACTI and you, as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. 3701 et seq. The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 C.F.R. 111.45.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. 437g(a)(4)(B) and 437g(a)(12)(A) until



PAGE 3

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**WESTERN  
UNION MAILGRAM**

Message Service



**UNITED STATES  
POSTAL SERVICE**

it is placed on the public record in accordance with 11 C.F.R. 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

Additional information on the FEC's administrative fine program, including the final regulations, is located at the FEC's website at [www.FEC.gov](http://www.FEC.gov). If you have questions regarding the payment of the calculated civil money penalty, please contact Dayna C. Brown in the Reports Analysis Division at our toll free number (800)424-9530 (press 1, then press 2) or (202)694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800)424-9530 (press 0, then ext 1660) or (202)694-1660.

Sincerely,

Bradley A. Smith  
Chairman

\* \* \* \* \*  
**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 C.F.R. 111.43, the amount of your civil money penalty calculated at RTE is \$2475 for the 2004 APRIL QUARTERLY Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:  
Federal Election Commission  
P.O. Box 952182  
St. Louis, MO 63195-2182

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:  
U.S. Bank - Government Lockbox  
FEC #952182  
1005 Convention Plaza  
St. Louis, MO 63101

The remittance and your payment are due by 07/20/2004. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: NATIONAL ITALIAN AMERICAN POLITICAL ACTI

FE ID#: C00355389

AF#: 1130

PAYMENT DUE DATE: 07/20/2004

PAGE 4 112521000479

**WESTERN UNION MAILGRAM**

Business Services

 **UNITED STATES POSTAL SERVICE**

PAYMENT AMOUNT DUE: \$2475

NGMCOMP 17:37 EST

2519025253



FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

October 25, 2004

**MEMORANDUM**

TO: JOHN D. GIBSON  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

FROM: SHAWN WOODHEAD WERTH  
REVIEWING OFFICER  
OFFICE OF ADMINISTRATIVE REVIEW

SUBJECT: AF# 1130 - NATIONAL ITALIAN AMERICAN POLITICAL  
ACTION COMMITTEE AND VINCENT M. LASORSA, AS  
TREASURER (C00355388)

On July 20, 2004, the Office of Administrative Review ("OAR") received a written response and supporting documentation ("challenge") from the respondents for the 2004 April Quarterly Report. In the challenge, the respondents cite computer problems and state that they "were unable to receive timely assistance from the technical advisor assigned to us. Subsequently, we did receive assistance and were able to comply once our data base was retrieved. We have recently been assigned to a new technical advisor because our previous advisor had left the FEC." A copy of the challenge is attached.

OAR requests that you forward any information regarding conversations between RAD staff and the respondents about the issues raised in the challenge. If you have no records relating to this request, please advise us accordingly.

Any information submitted by your office will be sent to the respondents, circulated to the Commission, and placed on the public record. Please contact me at 694-1660 if you have any questions. Thank you.

Attachment

2005 FEB 22 P 1:53



FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

February 22, 2005

**MEMORANDUM**

**TO:** Shawn Woodhead Werth  
Reviewing Officer  
Office of Administrative Review

**THROUGH:** John Gibson *[Signature]*  
Assistant Staff Director  
Reports Analysis Division

Debbie Chacona *[Signature]*  
Branch Chief, Party/Non-Party  
Reports Analysis Division

**FROM:** Patricia Carmona *[Signature]*  
Branch Chief, Compliance  
Reports Analysis Division

**SUBJECT:** Response to Request for Supplemental Information  
AF #1130 – National Italian American Political Action Committee  
and Vincent M. Lasorsa, as Treasurer.

Please see the attached record of telephone conversations between former Campaign Finance Analyst, Erik Koeppen and Anthony Mallace of the National Italian American PAC. These telephone conversations highlight instances in the past when RAD provided the Committee specific assistance in the filing of reports.

Please note that RAD has no record of any telephonic conversations held with the Committee concerning the filing of the 2004 April Quarterly Report.

If you have any further questions, please contact me at 694-1150. Thank you.

Attachments (3)

## Communication Log

Date/Time: 01/10/2003 12:22 PM

ID: C00355388

Name: NATIONAL ITALIAN AMERICAN POLITICAL  
ACTION COMMITTEE

Phone: (215) 355-5429

E-Mail Address:

Candidate:

Type: Phone Call

Contact: Anthony Mallace

Title: Treasurer

Communications Category Type:

Summary: Anthony called to find out how to access their reports online. I showed him our webpage and walked him through getting the PDF version for each report. I also told him that since they are going to have to file all of their reports anyway that they should go ahead and just file every single report from the MY 2001 electronically. I told him that if he had problems doing this I would walk him through the process.

Additional Remarks:

Analyst: Erik Koeppen

Branch: Party/Non-Party

AF#:

## Communication Log

Date/Time: 01/10/2003 03.13 PM

ID: C00355388

Name: NATIONAL ITALIAN AMERICAN POLITICAL  
ACTION COMMITTEE

Phone: (215) 355-5429

EMail Address:

Candidate:

Type: Phone Call

Contact: Anthony Mallace

Title:

Communications Category Type:

Summary: Anthony called because he couldn't get started inputting their report information into FECFILE 4. I walked him through the process of creating reports, how to open an existing committee file, how to input a beginning cash on hand through a "dummy report," and finally how to input receipts and disbursements. I told him to call me if he had any more information.

Additional Remarks:

Analyst: Erik Koeppen

Branch: Party/Non-Party

AF#:

## Communication Log

Date/Time: 01/07/2004 09:33 AM

ID: C00355388 Name: NATIONAL ITALIAN AMERICAN POLITICAL ACTION COMMITTEE

Phone: (215) 355-5429 EMail Address:

Candidate:

Type: Phone Call

Contact: Anthony Mallace

Title: Treasurer

Communications Category Type:

**Summary:** Anthony called to wonder why we haven't received their reports for 2003. I asked him to open up FECFILE to their reports page. Once there he said that all of the 2003 reports were still open and that they weren't closed even though he thought they were. I told him to right click on each report that was open (or in black) and put today's date in the space provided. He did this which then closed all of their reports. Once he did this I told him how to upload each report. Once he got to the point where you put in a password he asked how to get a new password in case he lost the other one. I told him that we have a place on our website that details exactly how to request a new password. He thanked me for my time and said that he must have missed some steps last time that kept him from uploading. I told him to please call me if they need any more assistance.

**Additional Remarks:**

Analyst: Erik Koeppen Branch: Party/Non-Party

AF#



FEDERAL ELECTION COMMISSION  
WASHINGTON D C 20463

August 17, 2004

**MEMORANDUM**

TO: JEFF CHUMLEY  
MANAGER, SYSTEMS ANALYSIS AND DESIGN BRANCH  
INFORMATION TECHNOLOGY DIVISION

FROM: SHAWN WOODHEAD WERTH *[Signature]*  
REVIEWING OFFICER  
OFFICE OF ADMINISTRATIVE REVIEW

SUBJECT: AF# 1130 – NATIONAL ITALIAN AMERICAN POLITICAL  
ACTION COMMITTEE AND VINCENT M. LASORSA,  
AS TREASURER (C00355388)

On July 20, 2004, the Commission received a written response and supporting documentation ("challenge") from the respondents for the 2004 April Quarterly Report. In the challenge, the respondents state that they "were unable to receive timely assistance from the technical advisor assigned to us. Subsequently, we did receive assistance and were able to comply once our data base was retrieved. We have recently been assigned to a new technical advisor because our previous advisor had left the FEC." A copy of the challenge is attached for your review.

Please provide any information regarding the issue raised in the challenge. If you have no records relating to this request, please advise OAR accordingly.

Any information submitted by your office will be sent to the respondents, circulated to the Commission and placed on the public record. Please contact me at 694-1660 if you have any questions. Thank you.

Attachment





FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20463

April 22, 2005

**MEMORANDUM**

TO: SHAWN WOODHEAD WERTH  
REVIEWING OFFICER  
OFFICE OF ADMINISTRATIVE REVIEW

FROM: JEFF CHUMLEY *JUC*  
MANAGER, SYSTEMS ANALYSIS AND DESIGN BRANCH  
INFORMATION TECHNOLOGY DIVISION

SUBJECT: AF# 1130 – NATIONAL ITALIAN AMERICAN POLITICAL  
ACTION COMMITTEE AND VINCENT M. LASORSA,  
AS TREASURER (C00355388)

In response to your request dated August 17, 2004, the Electronic Filing Office (EFO) provides the following information regarding the respondent's filing of 2004 April Quarterly Report:

December 6, 2002: FECFile was downloaded from the FEC website. The download function requests that the user provide contact information. On this date the name Anthony N. Mallace, CPA, JD was provided.

January 10, 2003: FECFile was downloaded from the FEC website. The contact name provided was Anthony N. Mallace, CPA, JD.

April 10, 2003: FECFile was downloaded from the FEC website. The contact name provided was Anthony N. Mallace, CPA, JD.

July 9, 2003: The EFO received a faxed Password Request Letter from the committee. FECFile was downloaded from the FEC website. The contact name provided was Anthony N. Mallace, CPA, JD.

July 10, 2003: A password was assigned to Mr. Anthony Mallace.

April 16, 2004: The EFO notified the committee by email that they had failed to file their 2004 April Quarterly Report. The FEC server mail log, which stores the email address provided by the filer, shows that the email was sent to [atty\\_cpa@netzero.com](mailto:atty_cpa@netzero.com).

April 22, 2004: Mr. Anthony Mallace called the EFO requesting assistance upgrading FECFile. Ms. Eliza Green of technical support provided upgrade instructions to Mr. Mallace.

May 13, 2004: The committee downloaded FECFile from the FEC website. The contact name provided was Anthony N. Mallace, CPA, JD. The same day, Mr. Anthony Mallace called technical support and spoke with Mr. Dustin Tull. Mr. Mallace explained that the hard drive that contained the committee's data file (\*.dcf) had crashed a few months ago and that the computer was out for repair. He further stated that he had installed FECFile on another computer and needed to file his 2004 April Quarterly Report. Mr. Tull suggested to Mr. Mallace that he contact the entity repairing the computer to retrieve the data file, and in the event that the data file could not be salvaged, to rebuild his data file. Mr. Tull guided Mr. Mallace to where on the FEC website he could find and download instructions on how to rebuild his data file. Mr. Tull walked Mr. Mallace through downloaded the instructions (for reconstructing his data file). Mr. Mallace stated he understood what needed to be done.

May 21, 2004: FECFile was downloaded from the FEC website. The contact name provided was Anthony N. Mallace, CPA, JD.

June 17, 2004: Mr. Anthony Mallace left a voice message for Mr. Ken Lally of the EFO. Mr. Mallace's message was not specific, only that he had been referred by the Audit Division and that he had a filing problem. Mr. Lally called Mr. Mallace back and left a voice message to call the EFO. Later in the morning, the EFO received a Password Request Letter faxed from the committee. Mr. Dustin Tull of tech support called Mr.

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0.1  
0

Anthony N. Mallace, CPA, J.D.  
109 West Merchant Street  
Audubon, NJ 08106  
Tel. (856) 546-1800  
Fax (856) 546-0142  
e-mail: [cpa@jersey.net](mailto:cpa@jersey.net)

July 9, 2003

Federal Election Commission  
Attention: Electronic Filing Office  
Room 419



Dear Sir or Madam:

This document serves Assets an official password request for the purpose of filing electronic reports for The National Italian American Political Action Committee.

The FEC-assigned 9-digit Committee ID for this Committee is C00355388.

You may contact me at (856) 546-1800.

I represent that I am the duly appointed treasurer and have authority Assets such to sign FEC reports for the above committee.

Sincerely

A handwritten signature in cursive script that reads "Anthony N. Mallace".

Anthony N. Mallace, CPA, J.D.

### DECLARATION OF PATRICIA CARMONA

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the research conducted with regard to the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters
2. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to the National Italian American Political Action Committee:
  - A) Prior Notice dated March 22, 2004 referencing the 2004 April Quarterly Report;
  - B) Non-Filer Mailgram dated May 5, 2004 referencing the 2004 April Quarterly Report;
  - C) Reason-to-Believe Mailgram dated June 15, 2004, referencing the 2004 April Quarterly Report.
3. I hereby certify that I have searched the Commission's public records and find that the National Italian American Political Action Committee filed the 2004 April Quarterly Report with the Commission on June 17, 2004.
4. Pursuant to 28 U.S.C 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on the 3<sup>rd</sup> day of November, 2004.



Patricia Carmona  
Chief, Compliance Branch  
Reports Analysis Division  
Federal Election Commission

# QUARTERLY REPORT NOTICE

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FEDERAL ELECTION COMMISSION

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**PARTIES AND PACS**

March 22, 2004

## **REPORTING DATES**

<b>REPORT</b>	<b>REPORTING PERIOD<sup>1</sup></b>	<b>REG./CERT. &amp; OVERNIGHT</b>	<b>FILING</b>
		<b>MAILING DATE<sup>2</sup></b>	<b>DATE</b>
April Quarterly	01/01/04 - 03/31/04	04/15/04	04/15/04

## **WHO MUST FILE**

All Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) filing on a quarterly basis must file a Quarterly Report in April. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

Recent changes to the law require certain party committees to file monthly reports (quarterly reporting is no longer an option for these committees). See the January 2004 issue of the *Record*, which can be found on the FEC web site at <http://www.fec.gov/pages/record.htm> for more information.

**NOTE:** A recent legislative change allows committees to file reports using overnight mail on the same terms as registered/certified mail. (See footnote 2).

## **PRE-ELECTION REPORTING**

Committees that make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. For the pre-election reporting guidelines, see the January 2004 *Record*, which can be found on the FEC web site at <http://www.fec.gov/pages/record.htm>.

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<sup>1</sup>These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

<sup>2</sup>Quarterly reports sent by registered or certified mail must be postmarked by the mailing date. Committees should keep the mailing receipt with its postmark as proof of filing. If using overnight mail, the delivery service must receive the report by the mailing date. "Overnight mail" means an overnight service with an on-line tracking system. Quarterly reports filed by any other means must be received by the Commission (or Secretary of the Senate for committees supporting only Senate candidates) by the filing date.

(over)

**48- AND 24-HOUR REPORTS ON INDEPENDENT EXPENDITURES**

Any PAC or Party Committee that makes independent expenditures in connection with an election may also have to file 48-hour or 24-hour reports. The 48-hour reporting requirement will be triggered each time the committee makes independent expenditures aggregating \$10,000 or more between January 1<sup>st</sup> and the 20<sup>th</sup> day before the election. The 24-hour reporting requirement will be triggered each time the committee makes independent expenditures aggregating \$1,000 or more after the 20<sup>th</sup> day, but more than 24 hours, before the day of the election. See 11 CFR 104.4.

These reports are *not* required when a Party Committee or PAC makes a contribution directly to a candidate. For a state-by-state chart of 48- and 24-hour reporting periods, visit the FEC web site at [http://www.fec.gov/pages/charts\\_ie\\_dates.htm](http://www.fec.gov/pages/charts_ie_dates.htm).

**COMPLIANCE**

- Treasurers of political committees are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time.
- Under the Administrative Fine Program, political committees and their treasurers who fail to file their reports on time may be subject to civil money penalties up to \$16,000 (or more for repeat late- and non-filers) For additional information, see the enclosed handout entitled, "Administrative Fine Program" and visit the FEC web site at <http://www.fec.gov/adminfines1.html>.
- In addition, political committees that file illegible reports or use non-FEC forms (except for FEC-approved, computer-generated forms) will be required to refile their reports.
- Electronic filers who instead file on paper or submit an electronic report (either by direct transmission or on 3.5" diskette) that does not pass the validation test will be considered non-filers and may be subject to enforcement actions (including administrative fines).

**ELECTRONIC FILING**

Political committees that receive contributions or make expenditures in excess of \$50,000 in a calendar year, or that expect to do so, must submit their reports electronically. For additional information, review the enclosed handout entitled "Electronic Filing," call the FEC's Electronic Filing office at (800) 424-9530 or (202) 694-1642, and visit our web site at <http://www.fec.gov/elecfil/electron.html>.

**CHANGE IN FILING FREQUENCY**

Committees able to change their reporting schedule (for example, from quarterly to monthly) who wish to do so must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequency no more than once per calendar year.

24038411235

**WESTERN  
UNION**

CONFIRMATION OF MAILGRAM TO VINCENT P. LASERSA CPA RJA  
NATIONAL ITALIAN AMERICAN POLITICAL ACTI  
1205 LOCUST ST  
PHILADELPHIA PA 19107-5457

JENNIFER S. CINELLI  
FEDERAL ELECTION COMMISSION  
999 E ST NW  
WASHINGTON DC 20463

MAY 5, 2004

IDENTIFICATION NUMBER: C00355388

REFERENCE: APRIL QUARTERLY (01/01/2004 - 03/31/2004)

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORTS OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATES FOR THESE REPORTS.

IT IS IMPORTANT THAT YOU FILE THESE REPORTS IMMEDIATELY WITH THE FEDERAL ELECTION COMMISSION, 999 E STREET, N.W., WASHINGTON, D.C., 20463. A COPY OF THE REPORTS OR RELEVANT PORTIONS MUST ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER UNLESS THE STATE IS EXEMPT FROM THE FEDERAL REQUIREMENT TO RECEIVE AND MAINTAIN PAPER COPIES.

THE FAILURE TO TIMELY FILE THESE REPORTS MAY RESULT IN CIVIL MONEY PENALTIES, AN AUDIT OR LEGAL ENFORCEMENT ACTION. THE CIVIL MONEY PENALTY CALCULATION FOR LATE REPORTS DOES NOT INCLUDE A GRACE PERIOD AND BEGINS ON THE DAY FOLLOWING THE DUE DATE FOR THE REPORT.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT ALAN SHOCK ON OUR TOLL FREE NUMBER (800)424-9530. OUR LOCAL NUMBER IS (202)694-1130.

SINCERELY,

JOHN S. GIBSON  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION



**WESTERN  
UNION**

CONFIRMATION OF CMGM

WESTERN UNION COMMERCIAL SERVICES  
TC:VINCENT M LASORSA CPA MBA  
NATIONAL ITALIAN AMERICAN POLITICAL ACTI  
1205 LOCUST ST  
PHILADELPHIA PA 19107-5457

FEDERAL ELECTION COMMISSION  
DAYNA BROWN  
999 E ST NW # 709  
WASHINGTON DC 20463

JUNE 15, 2004

VINCENT M LASORSA CPA MBA  
NATIONAL ITALIAN AMERICAN POLITICAL ACTI  
1205 LOCUST STREET  
PHILADELPHIA PA 19107

C00355388  
AF#: 1130

DEAR VINCENT M LASORSA CPA MBA:

THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED ("THE ACT"), REQUIRES THAT YOUR COMMITTEE FILE AN APRIL QUARTERLY REPORT OF RECEIPTS AND DISBURSEMENTS IN A CALENDAR YEAR DURING WHICH THERE IS A REGULARLY SCHEDULED ELECTION. THIS REPORT, COVERING THE PERIOD THROUGH MARCH 31ST, SHALL BE FILED NO LATER THAN APRIL 15TH. 2 U.S.C. 434(A). YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT. RECORDS AT THE FEDERAL ELECTION COMMISSION ("FEC") INDICATE THAT THIS REPORT WAS NOT FILED WITHIN THIRTY (30) DAYS OF THE DUE DATE. YOU SHOULD FILE THIS REPORT IF YOU HAVE NOT ALREADY DONE SO.

THE ACT WAS FURTHER AMENDED IN 1999 TO PERMIT THE FEC TO IMPOSE CIVIL MONEY PENALTIES FOR VIOLATIONS OF THE REPORTING REQUIREMENTS OF 2 U.S.C. 434(A). 2 U.S.C. 437G(A)(4). ON 06/10/2004, THE FEC FOUND THAT THERE IS REASON TO BELIEVE ("RTB") THAT NATIONAL ITALIAN AMERICAN POLITICAL ACTI AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) BY FAILING TO FILE TIMELY THIS REPORT ON OR BEFORE APRIL 15TH. BASED ON THE FEC'S SCHEDULES OF CIVIL MONEY PENALTIES AT 11 C.F.R. 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT THE RTB STAGE IS \$2475. IT IS DUE BY 07/20/2004 AND IS BASED ON THESE FACTORS:

ELECTION SENSITIVITY OF REPORT: NOT ELECTION SENSITIVE  
LEVEL OF ACTIVITY: \$40993  
NUMBER OF DAYS LATE: NOT FILED  
NUMBER OF PREVIOUS CIVIL MONEY PENALTIES ASSESSED: 7  
TO PAY THE CALCULATED CIVIL MONEY PENALTY


**WESTERN  
UNION®**
**WESTERN UNION COMMERCIAL SERVICES**

TO PAY THE CALCULATED CIVIL MONEY PENALTY, SEND THE ENCLOSED REMITTANCE AND YOUR PAYMENT TO THE FEC AT THE ADDRESS ON PAGE 3. UPON RECEIPT OF YOUR PAYMENT, THE FEC WILL SEND YOU A FINAL DETERMINATION LETTER.

TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY, YOU MUST SUBMIT A WRITTEN RESPONSE, INCLUDING THE AF# FOUND ON PAGE ONE, TO THE FEC'S OFFICE OF ADMINISTRATIVE REVIEW, 999 E STREET, NW, WASHINGTON, DC 20463. YOUR RESPONSE MUST BE RECEIVED BY 07/20/2004. YOUR WRITTEN RESPONSE MUST INCLUDE THE REASON(S) WHY YOU ARE CHALLENGING THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY. THE FEC WILL ONLY CONSIDER CHALLENGES THAT ARE BASED ON A FACTUAL ERROR, MISCALCULATION OF THE CALCULATED CIVIL MONEY PENALTY BY THE FEC, OR THE EXISTENCE OF EXTRAORDINARY CIRCUMSTANCES THAT PERSISTED FOR MORE THAN 48 HOURS THAT WERE BEYOND YOUR CONTROL AND PREVENTED YOU FROM FILING THE REPORT IN A TIMELY MANNER. YOUR RESPONSE MUST INCLUDE THE FACTUAL BASIS SUPPORTING THE REASON(S) AND SUPPORTING DOCUMENTATION. THE FEC STRONGLY ENCOURAGES THAT DOCUMENTS BE SUBMITTED IN THE FORM OF AFFIDAVITS OR DECLARATIONS. EXAMPLES OF CIRCUMSTANCES THAT WILL NOT BE CONSIDERED EXTRAORDINARY INCLUDE, BUT ARE NOT LIMITED TO, NEGLIGENCE, PROBLEMS WITH VENDORS OR CONTRACTORS, STAFF ILLNESS, COMPUTER FAILURES AND SIMILAR CIRCUMSTANCES. 11 C.F.R. 111.35(B)(1)(III) AND (4).

YOUR FAILURE TO RAISE AN ARGUMENT IN A TIMELY FASHION DURING THE ADMINISTRATIVE PROCESS SHALL BE DEEMED A WAIVER OF YOUR RIGHT TO PRESENT SUCH ARGUMENT IN A PETITION TO THE DISTRICT COURT UNDER 2 U.S.C. 437G. 11 C.F.R. 111.38.

IF YOU INTEND TO BE REPRESENTED BY COUNSEL, PLEASE ADVISE THE OFFICE OF ADMINISTRATIVE REVIEW. YOU SHOULD PROVIDE, IN WRITING, THE NAME, ADDRESS AND TELEPHONE NUMBER OF YOUR COUNSEL AND AUTHORIZE COUNSEL TO RECEIVE NOTIFICATIONS AND COMMUNICATIONS RELATING TO THIS CHALLENGE AND IMPOSITION OF THE CALCULATED CIVIL MONEY PENALTY.

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A CHALLENGE

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A WRITTEN RESPONSE, THE FEC WILL ASSUME THAT THE PRECEDING FACTUAL ALLEGATIONS ARE TRUE AND MAKE A FINAL DETERMINATION THAT NATIONAL ITALIAN AMERICAN POLITICAL ACTI AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) AND ASSESS A CIVIL MONEY PENALTY.

UNPAID CIVIL MONEY PENALTIES ASSESSED THROUGH THE ADMINISTRATIVE FINE REGULATIONS WILL BE SUBJECT TO THE DEBT COLLECTION ACT OF 1982 ("DCA") AS AMENDED BY THE DEBT COLLECTION IMPROVEMENT ACT OF 1996, 31 U.S.C. 3701 ET SEQ. THE FEC MAY TAKE ANY AND ALL APPROPRIATE ACTION AUTHORIZED AND REQUIRED BY THE DCA, AS AMENDED, INCLUDING TRANSFER TO THE U.S. DEPARTMENT OF THE TREASURY FOR COLLECTION. 11 C.F.R. 111.45.

THIS MATTER WAS GENERATED BASED ON INFORMATION ASCERTAINED BY THE FEC IN THE NORMAL COURSE OF CARRYING OUT ITS SUPERVISORY RESPONSIBILITIES. 2 U.S.C. 437G(A)(2). IT WILL REMAIN CONFIDENTIAL IN ACCORDANCE WITH 2 U.S.C. 437G(A)(4)(B) AND 437G(A)(12)(A) UNTIL IT IS PLACED ON THE PUBLIC RECORD IN ACCORDANCE WITH 11 C.F.R. 111.42, UNLESS YOU NOTIFY THE FEC IN WRITING THAT YOU WISH THE



WESTERN UNION COMMERCIAL SERVICES

MATTER TO BE MADE PUBLIC.

ADDITIONAL INFORMATION ON THE FEC'S ADMINISTRATIVE FINE PROGRAM, INCLUDING THE FINAL REGULATIONS, IS LOCATED AT THE FEC'S WEBSITE AT WWW.FEC.GOV. IF YOU HAVE QUESTIONS REGARDING THE PAYMENT OF THE CALCULATED CIVIL MONEY PENALTY, PLEASE CONTACT DAYNA C. BROWN IN THE REPORTS ANALYSIS DIVISION AT OUR TOLL FREE NUMBER (800)424-9530 (PRESS 1, THEN PRESS 2) OR (202)694-1130. IF YOU HAVE QUESTIONS REGARDING THE SUBMISSION OF A CHALLENGE, PLEASE CONTACT THE OFFICE OF ADMINISTRATIVE REVIEW AT OUR TOLL FREE NUMBER (800)424-9530 (PRESS 0, THEN EXT. 1660) OR (202)694-1660.

SINCERELY,

BRADLEY A. SMITH  
CHAIRMAN

\* \* \* \* \*  
ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 C.F.R. 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT RTB IS \$2475 FOR THE 2004 APRIL QUARTERLY REPORT.

PLEASE MAIL THIS REMITTANCE WITH A CHECK OR MONEY ORDER MADE PAYABLE TO THE FEDERAL ELECTION COMMISSION TO THE FOLLOWING ADDRESS:  
FEDERAL ELECTION COMMISSION  
P.O. BOX 952182  
ST. LOUIS, MO 63195-2182

IF YOU CHOOSE TO SEND YOUR REMITTANCE AND PAYMENT BY COURIER OR OVERNIGHT DELIVERY, PLEASE USE THIS ADDRESS:  
U.S. BANK - GOVERNMENT LOCKBOX  
FEC #952182  
1005 CONVENTION PLAZA  
ST. LOUIS, MO 63101

THE REMITTANCE AND YOUR PAYMENT ARE DUE BY 07/20/2004. UPON RECEIPT OF YOUR REMITTANCE AND PAYMENT, THE FEC WILL SEND YOU A FINAL DETERMINATION LETTER.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT  
-----

FOR: NATIONAL ITALIAN AMERICAN POLITICAL ACTI

FE ID#: C00355388

AF#: 1130

PAYMENT DUE DATE: 07/20/2004

PAYMENT AMOUNT DUE: \$2475

## Communication Log

Date/Time: 12/06/2002 01:30 PM

ID: C00355388

Name: NATIONAL ITALIAN AMERICAN POLITICAL  
ACTION COMMITTEE

Phone: (610) 660-7683

E-Mail Address:

Candidate:

Type: Phone Call

Contact: Anthony Mallace

Title:

Communications Category Type:

**Summary:** Mr. Mallace identified himself as the new treasurer for this committee. He called to discuss the committee's most recent administrative fines, AF #628 (Q1 2002) and AF #691 (Q2 2002). He asked if the only recourse left for AF #628 is to file a petition for the U.S. District Court in challenging the final determination for the administrative fine. I acknowledged that he was correct. I stated that AF #691 can still be challenged with the Commission's Office of Administrative Review since the deadline for the challenge is on 12/8/02. I stated that I will transfer his call to OAR after we have finished our discussion.

Mr. Mallace also asked what report was filed last and whether any paper filed reports were filed when the committee should have been filing those reports electronically. I answered his questions, however, I reminded him that these type of questions should be referred to his reports analyst, Erik Koeppen.

**Additional Remarks:**

Analyst: Alice Kang

Branch: Compliance

AF#:

## Communication Log

Date/Time: 05/19/2004 04:03 PM

ID: C00355388

Name: NATIONAL ITALIAN AMERICAN POLITICAL  
ACTION COMMITTEE

Phone: (856) 904-9215

E-Mail Address:

Candidate:

Type: Phone Call

Contact: Anthony Mallace

Title: (unofficial) Treasurer

Communications Category Type:

Summary: I was authorized by J. Gibson to give the committee a call to encourage them to file their Q1 report, since they had 7 previous violations in the AF program, and of late had paid all but one. Mr. Mallace indicated that he was having computer problems, but that he should be able to have the report filed in a couple of days.

Additional Remarks: The above number is his cell number.

Analyst: Alan Shook

Branch: Compliance

AF#

SENDER: COMPLETE THIS SECTION

1. Article Addressed to:

VINCENT M LASORSA  
CPA MBA  
NATIONAL ITALIAN AMERICAN  
POLITICAL ACTI  
1205 LOCUST ST  
PHILADELPHIA, PA 19107

2. Article Number  
(Transfer from service label) 70001670 0005 1341355

PS Form 3811, August 2001

COMPLETE THIS SECTION ON DELIVERY

A. Signature  
Mary Schmise ☐ Agent ☐ Addressee

B. Received by (Printed Name) C. Date of Delivery  
6-16-04

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type  
☐ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

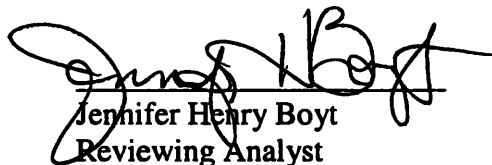
Domestic Return Receipt

## DECLARATION OF JENNIFER HENRY BOYT

1. I am the Reviewing Analyst in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Analyst, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
2. The 2004 April Quarterly Report is due April 15, 2004. If electronically filed, it must be received and validated by the Commission at or before 11:59 p.m., Eastern Standard/Daylight Time on April 15 to be timely filed.
3. It is the practice of the Commission to maintain the Commission's web site at [http://www.fec.gov/finance/disclosure/imaging\\_info.shtml](http://www.fec.gov/finance/disclosure/imaging_info.shtml) (formerly located at [http://www.fec.gov/finance\\_reports.html](http://www.fec.gov/finance_reports.html)) for the use of committees and treasurers to view their financial disclosure reports.
4. It is the practice of the Commission to maintain the Commission's web site at <http://www.fec.gov/support/index.shtml> (formerly located at <http://www.fec.gov/support/index.html>) for the use of committees and treasurers to get help with electronic filing, including instructions for rebuilding data files.
5. I hereby certify that I have searched the Commission's public records and that the documents identified herein are true and accurate copies of the:
  - a) amended Statement of Organization dated February 11, 2002 filed by the National Italian American Political Action Committee and Vincent M. LaSorsa, CPA, MBA, as Treasurer. According to the Commission's records, the amendment in the form of a letter was received March 5, 2002 and lists Vincent M. LaSorsa as the new Treasurer;
  - b) Page 1 of the Summary Page for the 2001 May Monthly, June Monthly, July Monthly, and Year End Reports; and the 2002 April Quarterly, July Quarterly, October Quarterly, and Year End Reports electronically filed by the National Italian American Political Action Committee. According to the Commission's records, these reports were received on July 17 and July 22, 2003. For each report, "ANTHONY N. MALLACE, CPA JD" is typed as the "Name of [the] Treasurer" and the "Signature of [the] Treasurer" line states that the report was "Electronically Filed by ANTHONY N. MALLACE, CPA JD;"
  - c) Pages 1 and 2 of the letters referencing the 2001 Amended May Monthly, June Monthly, July Monthly, and Year End Reports, and the 2002 Year End Report; and Pages 1 and 3, of the letters referencing the 2002 April Quarterly, July Quarterly, and October Quarterly Reports. According to the Commission's records, these letters are dated August 8, 2003, were sent by the Commission's Reports Analysis Division to the National Italian American Political Action Committee and Vincent M. Lasorsa CPA MBA, as Treasurer, and state, in part, that "Your report(s) was not signed by the treasurer or designated agent listed on your Statement of Organization. Please amend your report(s) by providing the signature of an individual that is authorized to sign the report(s).... If a new treasurer has been appointed, please file an amended Statement of Organization ... or a letter to reflect this change;"
  - d) Letters dated August 28, 2003 sent by the Commission's Reports Analysis Division to the National Italian American Political Action Committee and Vincent M. Lasorsa CPA MBA, as Treasurer. According to the Commission's records, each letter states that "as of August 27, 2003, the Commission has not received

your response to our requests for additional information dated August 8, 2003" and reference the 2001 Amended May Monthly, June Monthly, July Monthly, and Year End Reports; and 2002 April Quarterly, July Quarterly, October Quarterly, and Year End Reports;

- e) Page 1 of the Summary Page for the 2003 April Quarterly, July Quarterly, October Quarterly, and Year End Reports electronically filed by the National Italian American Political Action Committee. According to the Commission's records, the reports were received on January 7, January 11, and February 2, 2004. For each report, the "Name of [the] Treasurer is listed in one of the following formats: "ANTHONY N. MALLACE, CPA JD," "J.D. ANTHONY N. MALLACE, CPA," or "CPA, J.D. Anthony N. Mallace." For each report, the "Signature of [the] Treasurer" line states that the report was "Electronically Filed by ANTHONY N. MALLACE, CPA JD," "J.D. ANTHONY N. MALLACE, CPA," or "CPA, J.D. Anthony N. Mallace;"
  - f) Pages 1 and 3 of the Statement of Organization electronically filed by the National Italian American Political Action Committee and J.D. Anthony N. Mallace CPA, as Treasurer. According to the Commission's records, the Statement was received on June 17, 2004. Line 8 list J.D. Anthony N. Mallace CPA as Treasurer and as Designated Agent; and
  - g) Summary and Detailed Summary Pages of the 2004 April Quarterly Report electronically filed by the National Italian American Political Action Committee and J.D. Anthony N. Mallace CPA, as Treasurer. According to the Commission's records, the report covers the period from January 1 through March 31, 2004, was received on June 17, 2004, and lists \$77,529.00 in total receipts on Line 6(c) and \$75,279.05 in total disbursements on Line 7 for this reporting period. It also lists \$0.00 on Line 18(a) for transfers from the Non-Federal Account and on Line 21(a)(ii) for the Non-Federal share of operating expenditures.
6. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington on the 28<sup>th</sup> of April, 2005.



Jennifer Henry Boyt  
Reviewing Analyst

Office of Administrative Review  
Federal Election Commission





# FEDERAL ELECTION COMMISSION

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Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (800) 424-9530 In Washington (202) 694-1100  
For the hearing impaired, TTY (202) 219-3336 Send comments and suggestions about this site to: [webmaster@fec.gov](mailto:webmaster@fec.gov)

RECEIVED  
FEC MAIL ROOM

2002 MAR -5 P 1:01



# NATIONAL ITALIAN AMERICAN POLITICAL ACTION COMMITTEE

*"United we can make a powerful statement."*

**Officers:**

Arnaldo L. Berardi  
President

Anthony S. DiSandro  
Vice President

Joseph Tarantino, Jr.  
Vice President

Vincent La Sorsa, CPA  
Treasurer

Joseph A. Aubari  
Executive Director

**Board Members:**

Barbara Caporaso, Esq.

Joseph V. Carlucci, Esq.

Samuel Conrad

Joseph D'Andrea, Esq.

Frank Daniele

Anthony J. DiSandro Jr., Esq.

Louis J. Esposito

Andrew N. Farnese, Esq.

Vincenta Gerosavino

Dr. Donna Mancini

Vincent B. Mancini, Esq.

John Paone

Joseph A. Procone

Elizabeth D. Procto, Esq.

Joseph Rappaport, Esq.

Carol Tannhazuo

**Counsel:**

Mario D'Adamo, Esq.

**Advisory Board:**

Catherine Maggiano, Esq.

Alex Chazaro

Herbert Conrad

David (D) Amore

Joseph D'Andrea

Franklin DeLuca

Marilyn DiCiacobbe

Dante Mattson, Esq.

Luigi Merita, Esq.

Vincent Papale

Ana M. Sabatino

**Consultants:**

ITA Associates, Inc.

National Italian American  
Political Action Committee

(NIA-PAC)

1205 Locust Street

Suite 100

Philadelphia, PA 19107

Tel 215-545-2244

Fax: 215-545-1403

E-mail:

info@nia-pac.com

www.nia-pac.com

February 11, 2002

Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Re: National Italian Political Action Committee  
Treasurer's Representation Statement

I represent that I am the duly appointed Treasurer of the National Italian American Political Action Committee and as such, have the authority to sign the Federal Election Reports for the above-mentioned Committee.

A handwritten signature in dark ink, appearing to read "Vincent M. LaSorsa". The signature is fluid and cursive, with a large, stylized "V" and "L".

Vincent M. LaSorsa, CPA, MBA  
Treasurer

FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than An Authorized Committee

Office Use Only

1 NAME OF COMMITTEE (In full)	USE FEC MAILING LABEL OR TYPE OR PRINT	Example: If typing, type over the lines
National Italian American Political Action Committee		
ADDRESS (number and street)		
1205 Locust Street		
Suite 100		
Check if different than previously reported (ACC)		
Philadelphia PA 19107		

2. FEC IDENTIFICATION NUMBER CITY STATE ZIP CODE

C00955348

3 IS THIS REPORT X NEW (N) OR AMENDED (A)

4 TYPE OF REPORT (Choose One)	(b) Monthly Report Due On:	Feb 20 (M2)	X May 20 (M5)	Aug 20 (M8)	Nov 20 (M11) (Non-Election Year Only)
(a) Quarterly Reports:		Mar 20 (M3)	Jun 20 (M6)	Sep 20 (M9)	Dec 20 (M12) (Non-Election Year Only)
		Apr 20 (M4)	Jul 20 (M7)	Oct 20 (M10)	Jan 31 (YE)
	April 15 Quarterly Report (Q1)				
July 15 Quarterly Report (Q2)	(c) 12-Day PRE-Election Report for the	Primary (12P)	General (12G)	Runoff (12R)	
October 15 Quarterly Report (Q3)		Convention (12C)	Special (12G)		
January 31 Quarterly Report (YE)	Election on				in the State of
July 31 Mid-Year Report (Non-election Year Only) (MY)	(d) 30-Day Post-Election Report for the	General (30G)	Runoff (30R)	Special (30S)	
Termination Report (TER)	Election on				in the State of

5 Covering Period 04 01 2001 through 04 30 2001

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete

Type or Print Name of Treasurer ANTHONY N. MALLACE, CPA JD

Signature of Treasurer Electronically Filed by ANTHONY N. MALLACE, CPA JD Date 07 15 2003

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g.

Office Use Only							
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FEC FORM 3X  
(Rev. 02/2003)

FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than An Authorized Committee

Office Use Only

1	NAME OF COMMITTEE (in full)	USE FEC MAILING LABEL OR TYPE OR PRINT	Example: If typing, type over the lines
	National Italian American Political Action Committee		
	ADDRESS (number and street)	1235 Locust Street	
		Suite 100	
	Check if different than previously reported (ACC)	Philadelphia	PA 19107

2	FEC IDENTIFICATION NUMBER	CITY	STATE	ZIP CODE
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C00355348

3	IS THIS REPORT	X	NEW (N)	OR	AMENDED (A)
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4	TYPE OF REPORT (Choose One)	(b) Monthly Report Due On:	Feb 20 (M2)	May 20 (M5)	Aug 20 (M8)	Nov 20 (M11) (Non-Election Year Only)
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	Termination Report (TER)		Election on		in the State of	

5. Covering Period	05	01	2001	through	05	31	2001
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I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer ANTHONY N. MALLACE, CPA JD

Signature of Treasurer Electronically Filed by ANTHONY N. MALLACE, CPA JD Date 07 15 2003

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g.

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Office Use Only

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	National Italian American Political Action Committee		
	ADDRESS (number and street)	1205 Locust Street	
		Suite 100	
	Check if different than previously reported (ACC)	Philadelphia	PA 19107

2	FEC IDENTIFICATION NUMBER	CITY	STATE	ZIP CODE
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C00055348

3	IS THIS REPORT	X	NEW (N)	OR	AMENDED (A)
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4.	TYPE OF REPORT (Choose One)	(b) Monthly Report Due On	Feb 20 (M2)	May 20 (M5)	Aug 20 (M8)	Nov 20 (M11) (Non-Election Year Only)
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	Termination Report (TER)		Election on		in the State of	

5	Covering Period	06	01	2001	through	06	30	2001
---	-----------------	----	----	------	---------	----	----	------

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer ANTHONY N MALLACE, CPA JD

Signature of Treasurer Electronically Filed by ANTHONY N MALLACE, CPA JD Date 07 15 2003

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office Use Only							
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FEC FORM 3X  
(Rev. 02/2003)

FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than An Authorized Committee

Office Use Only

1	NAME OF COMMITTEE (In full)	USE FEC MAILING LABEL OR TYPE OR PRINT	Example If typing, type over the lines
	National Italian American Political Action Committee		

ADDRESS (number and street)	1205 Locust Street
	Suite 100
Check if different than previously reported (ACC)	Philadelphia PA 19107

2. FEC IDENTIFICATION NUMBER	CITY	STATE	ZIP CODE
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C00055348

3 IS THIS REPORT x NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)	(b) Monthly Report Due On:	Feb 20 (M2)	May 20 (M5)	Aug 20 (M8)	Nov 20 (M11) (Non-Election Year Only)
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October 15 Quarterly Report (Q3)		Convention (12C)	Special (12G)		
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July 31 Mid-Year Report (Non-election Year Only) (MY)	(d) 30-Day Post-Election Report for the:	General (30G)	Runoff (30R)	Special (30S)	
Termination Report (TER)	Election on				in the State of

5 Covering Period 07 01 2001 through 12 31 2001

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer ANTHONY N. MALLACE, CPA JD

Signature of Treasurer Electronically Filed by ANTHONY N. MALLACE, CPA JD Date 07 15 2003

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office Use Only							
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FEC FORM 3X  
(Rev. 02/2003)

FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example If typing, type over the lines

National Italian American Political Action Committee

ADDRESS (number and street)

1205 Locust Street

Suite 100

Check if different  
than previously  
reported (ACC)

Philadelphia

PA

19107

2. FEC IDENTIFICATION NUMBER

CITY

STATE

ZIP CODE

C00355348

3. IS THIS  
REPORT

x

NEW  
(N) ORAMENDED  
(A)4. TYPE OF REPORT  
(Choose One)(b) Monthly  
Report  
Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

Nov 20 (M11)  
(Non-Election  
Year Only)

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

Dec 20 (M12)  
(Non-Election  
Year Only)

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(a) Quarterly Reports:

X April 15  
Quarterly Report (Q1)  
July 15  
Quarterly Report (Q2)  
October 15  
Quarterly Report (Q3)  
January 31  
Quarterly Report (YE)

July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)

Termination Report  
(TER)

(c) 12-Day  
PRE-Election  
Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12G)

Election on

in the  
State of(d) 30-Day  
Post-Election  
Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the  
State of

5. Covering Period 01 01 2002 through 03 31 2002

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer ANTHONY N. MALLACE, CPA JD

Signature of Treasurer Electronically Filed by ANTHONY N. MALLACE, CPA JD

Date 07 15 2003

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g.

Office  
Use  
OnlyFEC FORM 3X  
(Rev. 02/2003)

FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than An Authorized Committee

Office Use Only

1 NAME OF COMMITTEE (In full)	USE FEC MAILING LABEL OR TYPE OR PRINT	Example If typing, type over the lines
National Italian American Political Action Committee		

ADDRESS (number and street)	1205 Locust Street
	Suite 100
Check if different than previously reported. (ACC)	Philadelphia PA 19107

2. FEC IDENTIFICATION NUMBER	CITY	STATE	ZIP CODE
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C00055348

3. IS THIS REPORT ☒ NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)	(b) Monthly Report Due On:	Feb 20 (M2)	May 20 (M5)	Aug 20 (M8)	Nov 20 (M11) (Non-Election Year Only)
(a) Quarterly Reports		Mar 20 (M3)	Jun 20 (M6)	Sep 20 (M9)	Dec 20 (M12) (Non-Election Year Only)
April 15 Quarterly Report (Q1)		Apr 20 (M4)	Jul 20 (M7)	Oct 20 (M10)	Jan 31 (YE)
X July 15 Quarterly Report (Q2)	(c) 12-Day PRE-Election Report for the:	Primary (12P)	General (12G)	Runoff (12R)	
October 15 Quarterly Report (Q3)		Convention (12C)	Special (12S)		
January 31 Quarterly Report (YE)					
July 31 Mid-Year Report (Non-election Year Only) (MY)	Election on				in the State of
Termination Report (TER)	(d) 30-Day Post-Election Report for the:	General (30G)	Runoff (30R)	Special (30S)	
					in the State of

5. Covering Period 04 01 2002 through 06 30 2002

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer ANTHONY N. MALLACE, CPA JD

Signature of Treasurer Electronically Filed by ANTHONY N. MALLACE, CPA JD Date 07 15 2003

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office Use Only							
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FEC FORM 3X  
(Rev. 02/2003)



FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example, if typing, type over the lines

National Italian American Political Action Committee

ADDRESS (number and street)

1205 Locust Street

Suite 100

Check if different  
than previously  
reported (ACC)

Philadelphia

PA

19107

2. FEC IDENTIFICATION NUMBER

C00055348

CITY

STATE

ZIP CODE

3. IS THIS  
REPORT

x

NEW  
(N) ORAMENDED  
(A)4. TYPE OF REPORT  
(Choose One)

(a) Quarterly Reports:

April 15  
Quarterly Report (Q1)July 15  
Quarterly Report (Q2)X October 15  
Quarterly Report (Q3)January 31  
Quarterly Report (YE)July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)(b) Monthly  
Report  
Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

Nov 20 (M11)  
(Non-Election  
Year Only)

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

Dec 20 (M12)  
(Non-Election  
Year Only)

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(c) 12-Day  
PRE-Election  
Report for the

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

in the  
State of(d) 30-Day  
Post-Election  
Report for the

General (30G)

Runoff (30R)

Special (30S)

Election on

in the  
State of

5. Covering Period 07 01 2002 through 09 30 2002

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer ANTHONY N. MALLACE, CPA JD

Signature of Treasurer Electronically Filed by ANTHONY N. MALLACE, CPA JD

Date 07 15 2003

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g.

Office  
Use  
OnlyFEC FORM 3X  
(Rev. 02/2003)

FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than An Authorized Committee

Office Use Only

1 NAME OF COMMITTEE (In full)	USE FEC MAILING LABEL OR TYPE OR PRINT	Example: If typing, type over the lines
National Italian American Political Action Committee		
ADDRESS (number and street)		
1205 Locust Street		
Suite 100		
Check if different than previously reported (ACC)		
Philadelphia		PA 19107

2 FEC IDENTIFICATION NUMBER	CITY	STATE	ZIP CODE
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C00055348

3 IS THIS REPORT	x	NEW (N)	OR	AMENDED (A)
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4 TYPE OF REPORT (Choose One)	(b) Monthly Report Due On	Feb 20 (M2)	May 20 (M5)	Aug 20 (M8)	Nov 20 (M11) (Non-Election Year Only)
(a) Quarterly Reports		Mar 20 (M3)	Jun 20 (M6)	Sep 20 (M9)	Dec 20 (M12) (Non-Election Year Only)
		Apr 20 (M4)	Jul 20 (M7)	Oct 20 (M10)	Jan 31 (YE)
	April 15 Quarterly Report (Q1)				
July 15 Quarterly Report (Q2)	(c) 12-Day PRE-Election Report for the	Primary (12P)	General (12G)	Runoff (12R)	
October 15 Quarterly Report (Q3)		Convention (12C)	Special (12G)		
X January 31 Quarterly Report (YE)		Election on		in the State of	
July 31 Mid-Year Report (Non-election Year Only) (MY)	(d) 30 Day Post-Election Report for the	General (30G)	Runoff (30R)	Special (30B)	
Termination Report (TER)		Election on		in the State of	

5 Covering Period	10	01	2002	through	12	31	2002
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I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer ANTHONY N. MALLACE, CPA JD

Signature of Treasurer Electronically Filed by ANTHONY N. MALLACE, CPA JD Date 07 15 2003

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g.

Office Use Only							
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FEC FORM 3X  
(Rev. 02/2003)



FEDERAL ELECTION COMMISSION  
WASHINGTON D.C. 20463

RQ-2

AUG 08 2003

Vincent M Lasorsa CPA MBA, Treasurer  
National Italian American Political Action  
Committee  
1205 Locust Street  
Suite 100  
Philadelphia, PA 19107

Identification Number: C00355388

Reference: Amended May Monthly Report (4/1/01-4/30/01), received 7/17/03

Dear Mr. Lasorsa:

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:

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule(s) B supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

-Your report(s) was not signed by the treasurer or designated agent listed on your Statement of Organization. Please amend your report(s) by providing the signature of an individual that is authorized to sign the report(s). 2 U.S.C. §434(a)(1) and 11 CFR §104.14(a) and (d) If a new treasurer has been appointed, please file an amended Statement of Organization (FORM 1) or a letter to reflect this change.

-For your information, all contributions received that aggregate \$200 or less per individual for the calendar year should be reported on Line 11(a)(ii). Contributions received aggregating over \$200 per individual for the calendar year should be reported on Line 11(a)(i) and itemized on Schedule A.

-The loan schedule (Schedule C) should disclose the following information: the name and mailing address of the person making or receiving the loan, original amount, cumulative payment, outstanding balance, date incurred, date due, and interest rate for all loans that your committee has received. Please amend Schedule C by providing the date due and interest rate for the loan. 11 CFR §§104.3(d) and 104.11(a)

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,

*Eric W. Koeppe*

Eric W. Koeppe  
Senior Campaign Finance Analyst  
Reports Analysis Division



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Vincent M Lasorsa CPA MBA, Treasurer  
National Italian American Political Action  
Committee  
1205 Locust Street  
Suite 100  
Philadelphia, PA 19107

AUG 08 2003

Identification Number: C00355328

Reference: June Monthly Report (5/1/01-5/31/01)

Dear Mr. Lasorsa:

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:

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule(s) B supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the

non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

-Your report(s) was not signed by the treasurer or designated agent listed on your Statement of Organization. Please amend your report(s) by providing the signature of an individual that is authorized to sign the report(s). 2 U.S.C. §434(a)(1) and 11 CFR §104.14(a) and (d) If a new treasurer has been appointed, please file an amended Statement of Organization (FORM 1) or a letter to reflect this change.

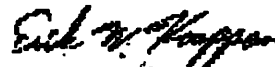
-For your information, all contributions received that aggregate \$200 or less per individual for the calendar year should be reported on Line 11(a)(ii). Contributions received aggregating over \$200 per individual for the calendar year should be reported on Line 11(a)(i) and itemized on Schedule A.

-Schedule B supporting Line 23 of your report discloses a contribution(s) to "SER PAC." Please clarify whether this is a federal committee(s), as there does not appear to be a committee(s) registered with the Commission under this name(s). In the event this is a non-federal committee(s), please disclose it on Schedule B supporting Line 29 of the Detailed Summary Page.

-The loan schedule (Schedule C) should disclose the following information: the name and mailing address of the person making or receiving the loan, original amount, cumulative payment, outstanding balance, date incurred, date due, and interest rate for all loans that your committee has received. Please amend Schedule C by providing the due date and the interest of the loan. 11 CFR §§104.3(d) and 104.11(a)

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  
Senior Campaign Finance Analyst  
Reports Analysis Division



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Vincent M Lasorsa CPA MBA, Treasurer  
National Italian American Political Action Committee  
1205 Locust Street  
Suite 100  
Philadelphia, PA 19107

AUG 08 2003

Identification Number: C00355388

Reference: July Monthly Report (6/1/01-6/30/01)

Dear Mr. Lasorsa:

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 A of your report (pertinent portion(s) attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

## National Italian American Political Action Committee

Page 2

Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the retribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek retribution, transfer-out or refund the excessive amount will be taken into consideration.

-The loan schedule (Schedule C) should disclose the following information: the name and mailing address of the person making or receiving the loan, original amount, cumulative payment, outstanding balance, date incurred, date due, and interest rate for all loans that your committee has received. Please amend Schedule C by providing the due date and interest rate for the loan. 11 CFR §§104.3(d) and 104.11(a)

-Your report(s) was not signed by the treasurer or designated agent listed on your Statement of Organization. Please amend your report(s) by providing the signature of an individual that is authorized to sign the report(s). 2 U.S.C. §434(a)(1) and 11 CFR §104.14(a) and (d) If a new treasurer has been appointed, please file an amended Statement of Organization (FORM 1) or a letter to reflect this change.

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





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Vincent M Lasorsa CPA MBA, Treasurer  
National Italian American Political Action Committee  
1205 Locust Street  
Suite 100  
Philadelphia, PA 19107

AUG 08 2003

Identification Number: C00355388

Reference: Year End Report (7/1/01-12/31/01)

Dear Mr. Lasorsa:

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:

-The loan schedule (Schedule C) should disclose the following information: the name and mailing address of the person making or receiving the loan, original amount, cumulative payment, outstanding balance, date incurred, date due, and interest rate for all loans that your committee has received. Please amend Schedule C by providing the due date and interest rate of the loan. 11 CFR §§104.3(d) and 104.11(a)

-Your report(s) was not signed by the treasurer or designated agent listed on your Statement of Organization. Please amend your report(s) by providing the signature of an individual that is authorized to sign the report(s). 2 U.S.C. §434(a)(1) and 11 CFR §104.14(a) and (d) If a new treasurer has been appointed, please file an amended Statement of Organization (FORM 1) or a letter to reflect this change.

-For your information, all contributions received that aggregate \$200 or less per individual for the calendar year should be reported on Line 11(a)(ii). Contributions received aggregating over \$200 per individual for the calendar year should be reported on Line 11(a)(i) and itemized on Schedule A.

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



FEDERAL ELECTION COMMISSION  
WASHINGTON D.C. 20463

RQ-2

Vincent M Lasorsa CPA MBA, Treasurer  
National Italian American Political Action  
Committee  
1205 Locust Street  
Suite 100  
Philadelphia, PA 19107

AUG 8 8 2003

Identification Number: C00355388

Reference: April Quarterly Report (1/1/02-3/31/02)

Dear Mr. Lasorsa:

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:

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

National Italian American Political Action Committee  
Page 3

this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

-The loan schedule (Schedule C) should disclose the following information: the name and mailing address of the person making or receiving the loan, original amount, cumulative payment, outstanding balance, date incurred, date due, and interest rate for all loans that your committee has received. Please amend Schedule C by providing the due date and interest rate of the loan. 11 CFR §§104.3(d) and 104.11(a)

-Your report(s) was not signed by the treasurer or designated agent listed on your Statement of Organization. Please amend your report(s) by providing the signature of an individual that is authorized to sign the report(s). 2 U.S.C. §434(a)(1) and 11 CFR §104.14(a) and (d) If a new treasurer has been appointed, please file an amended Statement of Organization (FORM 1) or a letter to reflect this change.

-For your information, all contributions received that aggregate \$200 or less per individual for the calendar year should be reported on Line 11(a)(ii). Contributions received aggregating over \$200 per individual for the calendar year should be reported on Line 11(a)(i) and itemized on Schedule A.

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



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Vincent M Lasorsa CPA MBA, Treasurer  
National Italian American Political Action  
Committee  
1205 Locust Street  
Suite 100  
Philadelphia, PA 19107

AUG 08 2003

Identification Number: C00355388

Reference: July Quarterly Report (4/1/02-6/30/02)

Dear Mr. Lasorsa:

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 A of your report (pertinent portion(s) attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

## National Italian American Political Action Committee

Page 3

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

-The loan schedule (Schedule C) should disclose the following information: the name and mailing address of the person making or receiving the loan, original amount, cumulative payment, outstanding balance, date incurred, date due, and interest rate for all loans that your committee has received. Please amend Schedule C by providing the due date and interest rate of the loan. 11 CFR §§104.3(d) and 104.11(a)

-Your report(s) was not signed by the treasurer or designated agent listed on your Statement of Organization. Please amend your report(s) by providing the signature of an individual that is authorized to sign the report(s). 2 U.S.C. §434(a)(1) and 11 CFR §104.14(a) and (d) If a new treasurer has been appointed, please file an amended Statement of Organization (FORM 1) or a letter to reflect this change.

-For your information, all contributions received that aggregate \$200 or less per individual for the calendar year should be reported on Line 11(a)(ii). Contributions received aggregating over \$200 per individual for the calendar year should be reported on Line 11(a)(i) and itemized on Schedule A.

-For future reporting, please be advised that only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 29.

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



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

RQ-2

Vincent M Lasorsa CPA MBA, Treasurer  
National Italian American Political Action  
Committee  
1205 Locust Street  
Suite 100  
Philadelphia, PA 19107

AUG 8 8 2003

Identification Number: C00355388

Reference: October Quarterly Report (7/1/02-9/30/02)

Dear Mr. Lasorsa:

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 A of your report (pertinent portion(s) attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

## National Italian American Political Action Committee

Page 3

this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

-The loan schedule (Schedule C) should disclose the following information: the name and mailing address of the person making or receiving the loan, original amount, cumulative payment, outstanding balance, date incurred, date due, and interest rate for all loans that your committee has received. Please amend Schedule C by providing the due date and interest rate of the loan. 11 CFR §§104.3(d) and 104.11(a)

-Your report(s) was not signed by the treasurer or designated agent listed on your Statement of Organization. Please amend your report(s) by providing the signature of an individual that is authorized to sign the report(s). 2 U.S.C. §434(a)(1) and 11 CFR §104.14(a) and (d) If a new treasurer has been appointed, please file an amended Statement of Organization (FORM 1) or a letter to reflect this change.

-For future reporting, please be advised that only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 29.

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





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Vincent M Lasorsa CPA MBA, Treasurer  
National Italian American Political Action  
Committee  
1205 Locust Street  
Suite 100  
Philadelphia, PA 19107

AUG 08 2003

Identification Number: C00355388

Reference: Year End Report (10/1/02-12/31/02)

Dear Mr. Lasorsa:

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:

-The loan schedule (Schedule C) should disclose the following information: the name and mailing address of the person making or receiving the loan, original amount, cumulative payment, outstanding balance, date incurred, date due, and interest rate for all loans that your committee has received. Please amend Schedule C by providing the due date and interest rate of the loan. 11 CFR §§104.3(d) and 104.11(a)

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule(s) B supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

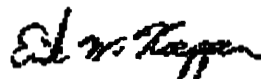
Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

-Your report(s) was not signed by the treasurer or designated agent listed on your Statement of Organization. Please amend your report(s) by providing the signature of an individual that is authorized to sign the report(s). 2 U.S.C. §434(a)(1) and 11 CFR §104.14(a) and (d) If a new treasurer has been appointed, please file an amended Statement of Organization (FORM 1) or a letter to reflect this change.

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  
Senior Campaign Finance Analyst  
Reports Analysis Division



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

August 28, 2003

Vincent M. Lasorsa CPA MBA, Treasurer  
National Italian American Political Action  
Committee  
1205 Locust Street, Suite 100  
Philadelphia, PA 19107

Identification Number: C00355388

Reference: Amended May Monthly (4/1/01-4/30/01), received 7/17/03, June  
Monthly (5/1/01-5/31/01), July Monthly (6/1/01-6/30/01) and Year End  
(7/1/01-12/31/01) Reports

Dear Mr. Lasorsa:

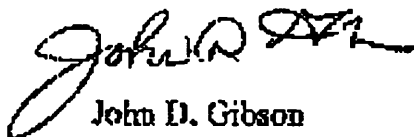
This letter is to inform you that as of August 27, 2003 the Commission has not received your response to our requests for additional information dated August 8, 2003. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

An adequate response must be received at the Commission by September 17, 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 should 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) or our local number (202) 694-1130.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson", with a stylized flourish at the end.

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosures

2025 RELEASE UNDER E.O. 14176



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

August 28, 2003

Vincent M. Lasorsa CPA MBA, Treasurer  
National Italian American Political Action  
Committee  
1205 Locust Street, Suite 100  
Philadelphia, PA 19107

Identification Number: C00355388

Reference: ~~April Quarterly (4/1/02-3/31/02)~~, July Quarterly (4/1/02-6/30/02),  
~~October Quarterly (7/1/02-9/30/02)~~ and Year End (10/1/02-12/31/02)  
Reports

Dear Mr. Lasorsa:

This letter is to inform you that as of August 27, 2003 the Commission has not received your response to our requests for additional information dated August 8, 2003. These notices request 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 these requests (copies enclosed).

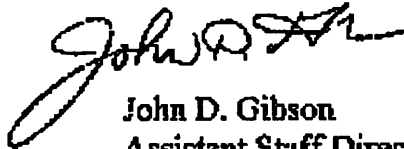
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Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter, please contact Erik Koeppen on our toll-free number

20030828 15:41:31

(800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson". The signature is fluid and cursive, with a large initial "J" and a stylized "G".

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosures

2025 RELEASE UNDER E.O. 14176

FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS

For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

National Italian American Political Action Committee

ADDRESS (number and street)

1205 Locust Street

Suite 100

Check if different  
than previously  
reported (ACC)

Philadelphia

PA

19107

2. FEC IDENTIFICATION NUMBER

CITY

STATE

ZIP CODE

C00355388

3. IS THIS  
REPORT

X

NEW  
(N)

OR

AMENDED  
(A)4. TYPE OF REPORT  
(Choose One)

(a) Quarterly Reports:

X

April 15  
Quarterly Report (Q1)July 15  
Quarterly Report (Q2)October 15  
Quarterly Report (Q3)January 31  
Quarterly Report (YE)July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)(b) Monthly  
Report  
Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

Nov 20 (M11)  
(Non-Election  
Year Only)

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

Dec 20 (M12)  
(Non-Election  
Year Only)

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(c) 12-Day  
PRE-Election  
Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

in the  
State of(d) 30-Day  
Post-Election  
Report for the

General (30G)

Runoff (30R)

Special (30S)

Election on

in the  
State of

5. Covering Period

01

01

2003

through

03

31

2003

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete

Type or Print Name of Treasurer

ANTHONY N. MALLACE, CPA JD

Signature of Treasurer

Electronically Filed by ANTHONY N. MALLACE, CPA JD

Date

01

07

2004

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g.

Office Use Only							
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FEC FORM 3X  
(Rev. 02/2003)

FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than An Authorized Committee

Office Use Only

1	NAME OF COMMITTEE (In full)	USE FEC MAILING LABEL OR TYPE OR PRINT	Example: If typing, type over the lines
	National Italian American Political Action Committee		

ADDRESS (number and street)	1205 Locust Street
	Suite 100
Check if different than previously reported (ACG)	Philadelphia PA 19107

2	FEC IDENTIFICATION NUMBER	CITY	STATE	ZIP CODE
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C00355348

3	IS THIS REPORT	X	NEW (N)	OR	AMENDED (A)
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4	TYPE OF REPORT (Choose One)	(b) Monthly Report Due On:	Feb 20 (M2)	May 20 (M5)	Aug 20 (M8)	Nov 20 (M11) (Non-Election Year Only)
	(a) Quarterly Reports		Mar 20 (M3)	Jun 20 (M6)	Sep 20 (M9)	Dec 20 (M12) (Non-Election Year Only)
	April 15 Quarterly Report (Q1)		Apr 20 (M4)	Jul 20 (M7)	Oct 20 (M10)	Jan 31 (YE)
	X July 15 Quarterly Report (Q2)	(c) 12-Day PRE-Election Report for the:	Primary (12P)	General (12G)	Runoff (12R)	
	October 15 Quarterly Report (Q3)		Convention (12C)	Special (12G)		
	January 31 Quarterly Report (YE)	Election on	in the State of			
	July 31 Mid-Year Report (Non-election Year Only) (MY)	(d) 30-Day Post-Election Report for the:	General (30G)	Runoff (30R)	Special (30S)	
	Termination Report (TER)	Election on	in the State of			

5	Covering Period	04	01	2003	through	06	30	2003
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I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer J.D. ANTHONY N. MALLACE CPA

Signature of Treasurer Electronically Filed by J.D. ANTHONY N. MALLACE CPA Date 01 11 2004

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office Use Only							
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FEC FORM 3X  
(Rev. 02/2003)



FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) USE FEC MAILING LABEL OR TYPE OR PRINT Example If typing, type over the lines

National Italian American Political Action Committee

ADDRESS (number and street)

1205 Locust Street

Suite 100

Check if different  
than previously  
reported (ACC)

Philadelphia

PA

19107

2. FEC IDENTIFICATION NUMBER CITY STATE ZIP CODE

C00355388

3. IS THIS REPORT NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)	(b) Monthly Report Due On	Feb 20 (M2)	May 20 (M5)	Aug 20 (M8)	Nov 20 (M11) (Non-Election Year Only)
(a) Quarterly Reports		Mar 20 (M3)	Jun 20 (M6)	Sep 20 (M9)	Dec 20 (M12) (Non-Election Year Only)
		Apr 20 (M4)	Jul 20 (M7)	Oct 20 (M10)	Jan 31 (YE)
April 15 Quarterly Report (Q1)					
July 15 Quarterly Report (Q2)					
X October 15 Quarterly Report (Q3)					
January 31 Quarterly Report (YE)					
July 31 Mid-Year Report (Non-election Year Only) (MY)					
Termination Report (TER)					
	(c) 12-Day PRE-Election Report for the	Primary (12P)	General (12G)	Runoff (12R)	
		Convention (12C)	Special (12G)		
	Election on				in the State of
	(d) 30-Day Post-Election Report for the	General (30G)	Runoff (30R)	Special (30S)	
	Election on				in the State of

5. Covering Period 07 01 2003 through 09 30 2003

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete

Type or Print Name of Treasurer J D ANTHONY N MALLACE CPA

Signature of Treasurer Electronically Filed by J D ANTHONY N MALLACE CPA Date 01 11 2004

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g

Office Use Only							
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FEC FORM 3X  
(Rev. 02/2003)

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FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than An Authorized Committee

Office Use Only

1 NAME OF COMMITTEE (in full) USE FEC MAILING LABEL OR TYPE OR PRINT Example If typing, type over the lines

National Italian American Political Action Committee

ADDRESS (number and street)

1205 Locust Street

Suite 100

Check if different  
than previously  
reported (ACC)

Philadelphia

PA

19107

2 FEC IDENTIFICATION NUMBER CITY STATE ZIP CODE

C00355348

3 IS THIS REPORT X NEW (N) OR AMENDED (A)

4 TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

X January 31 Quarterly Report (YE)

July 31 Mid-Year Report (Non-election Year Only) (MY)

Termination Report (TER)

(b) Monthly Report Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

Nov 20 (M11) (Non-Election Year Only)

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

Dec 20 (M12) (Non-Election Year Only)

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(c) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12G)

Election on \_\_\_\_\_ in the State of \_\_\_\_\_

(d) 30-Day Post-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on \_\_\_\_\_ in the State of \_\_\_\_\_

5. Covering Period 10 01 2003 through 12 31 2003

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer CPA, J.D. Anthony N. Mallace

Signature of Treasurer Electronically Filed by CPA, J.D. Anthony N. Mallace Date 02 02 2004

NOTE Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office Use Only							
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FEC FORM 3X  
(Rev. 02/2003)

**FEC  
FORM 1****STATEMENT OF  
ORGANIZATION**

(See Instructions)

27c2 .54 cm;

1 NAME OF COMMITTEE (in full) (Check if name is changed) Example, if typing, type over the lines 12FE4M5

National Italian American Political Action Committee

ADDRESS (if not a street)

1205 Locust Street

(Check if address is changed)

Suite 100

Philadelphia

PA

19107

CITY ▲

STATE ▲

ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS

atty\_cpa@netzero.com

COMMITTEE'S WEB PAGE ADDRESS (URL)

www.nia-pec.com

COMMITTEE'S FAX NUMBER

8565460142

2. DATE 06 17 2004

3. FEC IDENTIFICATION NUMBER

C C00355388

4. IS THIS STATEMENT ☒ NEW (N) OR ☐ AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer J.D. ANTHONY N. MALLACE CPA

Signature of Treasurer Electronically Filed by J.D. ANTHONY N. MALLACE CPA Date 06 17 2004

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. 5437g.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS

Office  
Use  
OnlyFor further information contact:  
Federal Election Commission  
Toll Free 800-424-9530  
Local 202-694-1100**FEC FORM 1**  
(Revised 02/2003)

Write or Type Committee Name

National Italian American Political Action Committee

- 7 **Custodian of Records.** Identify by name, address, (phone number -- optional), and position of the person in possession of Committee books and records.

Full Name

Mailing Address

Title or Position ▼

CITY ▲

STATE ▲

ZIP CODE ▲

Telephone number

- 8 **Treasurer:** List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name

of Treasurer

J.D. ANTHONY N. MALLACE CPA

Mailing Address

109 W. MERCHANT ST

AUDUBON

NJ

08106 -

Title or Position ▼

CITY ▲

STATE ▲

ZIP CODE ▲

Telephone number

Full Name of  
Designated  
Agent

J.D. ANTHONY N. MALLACE CPA

Mailing Address

109 W. MERCHANT ST

AUDUBON

NJ

08106 -

Title or Position ▼

CITY ▲

STATE ▲

ZIP CODE ▲

Telephone number

FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than An Authorized Committee

Office Use Only

1 NAME OF COMMITTEE (In full) USE FEC MAILING LABEL OR TYPE OR PRINT Example if typing, type over the lines

National Italian American Political Action Committee

ADDRESS (number and street)

1205 Locust Street

Suite 100

Check if different  
than previously  
reported (ACC)

Philadelphia

PA

19107

2 FEC IDENTIFICATION NUMBER

CITY A

STATE A

ZIP CODE A

C00355348

3 IS THIS  
REPORT

X

NEW  
(N) ORAMENDED  
(A)4. TYPE OF REPORT  
(Choose One)

(a) Quarterly Reports.

X April 15  
Quarterly Report (Q1)

July 15  
Quarterly Report (Q2)

October 15  
Quarterly Report (Q3)

January 31  
Quarterly Report (YE)

July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)

Termination Report  
(TER)

(b) Monthly  
Report  
Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

Nov 20 (M11)  
(Non-Election  
Year Only)

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

Dec 20 (M12)  
(Non-Election  
Year Only)

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(c) 12-Day  
PRE-Election  
Report for the

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

in the  
State of(d) 30-Day  
Post-Election  
Report for the

General (30G)

Runoff (30R)

Special (30S)

Election on

in the  
State of

5 Covering Period 01 01 2004 through 03 31 2004

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer CPA, J.D. Anthony N. Mallace

Signature of Treasurer Electronically Filed by CPA, J.D. Anthony N. Mallace

Date 06 17 2004

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 4312.

Office  
Use  
OnlyFEC FORM 3X  
(Rev. 02/2003)

# SUMMARY PAGE

OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev 02/2003)

Page 2

Write or Type Committee Name

National Italian American Political Action Committee

Report Covering the Period From 01 01 2004 To 03 31 2004

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6 (a) Cash on Hand January 1 2004		41247.33
(b) Cash on Hand at Beginning of Reporting Period	41247.33	
(c) Total Receipts (from Line 19)	77529.00	77529.00
(d) Subtotal (add lines 6(b) and 6(c) for Column A and Lines 6(b) and 6(c) for Column B)	118776.33	118776.33
7 Total Disbursements (from Line 31)	75279.05	75279.05
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	43497.28	43497.28
9. Debts and Obligations owed TO the committee (itemize all on Schedule C and/or Schedule D)	0.00	
10. Debts and Obligations owed BY the committee (itemize all on Schedule C and/or Schedule D)	10000.00	

This Committee has qualified as a multicandidate committee (see FEC FORM 1M)

For further information contact:

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Toll Free 800-424-9530  
Local 202-694-1100

# **DETAILED SUMMARY PAGE OF RECEIPTS**

FEC Form 3X (Rev 02/2003)

Page 3

Write or Type Committee Name

National Italian American Political Action Committee

Report Covering the Period From 01 01 2004 To 03 31 2004

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11 Contributions (other than loans) From		
(a) Individuals/Persons Other		
Than Political Committees		
(i) Itemized (use Schedule A) .....	68243.00	
(ii) Unitemized .....	5886.00	
(iii) TOTAL (add		
Lines 11(a)(i) and (ii) .....	74129.00	74129.00
(b) Political Party Committees .....	0.00	0.00
(c) Other Political Committees		
(such as PACs) .....	3400.00	3400.00
(d) Total Contributions (add Lines		
11(a)(iii), (b) and (c)) (Carry		
Totals to Line 33, page 5) .....	77529.00	77529.00
12 Transfers From Affiliated/Other		
Party Committees .....	0.00	0.00
13 All Loans Received .....	0.00	0.00
14 Loan Repayments Received .....	0.00	0.00
15 Offsets To Operating Expenditures		
(Refunds, Rebates, etc.)		
(Carry Totals to Line 37, page 5) .....	0.00	0.00
16 Refunds of Contributions Made		
to Federal candidates and Other		
Political Committees .....	0.00	0.00
17 Other Federal Receipts		
(Dividends, Interest, etc.) .....	0.00	0.00
18 Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account		
(from Schedule H3) .....	0.00	0.00
(b) Levin Funds (from Schedule H5) .....	0.00	0.00
(c) Total Transfer (add 18(a) and 18(b))	0.00	0.00
19 Total Receipts (add Lines 11(d),		
12, 13, 14, 15, 16, 17, and 18(c)) .....	77529.00	77529.00
20 Total Federal Receipts		
(subtract Line 18(c) from Line 19) .....	77529.00	77529.00

**DETAILED SUMMARY PAGE**  
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 4

II. DISBURSEMENTS	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures		
(a) Shared Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share	0 00	0 00
(ii) Non-Federal Share	0 00	0 00
(b) Other Federal Operating Expenditures	75279 05	75279 05
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii) and (b))	75279 05	75279 05
22. Transfers to Affiliated/Other Party Committees	0 00	0 00
23. Contributions to Federal Candidates/Committees and Other Political Committees	0 00	0 00
24. Independent Expenditure (use Schedule E)	0 00	0 00
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F)	0 00	0 00
26. Loan Repayments Made	0 00	0 00
27. Loans Made	0 00	0 00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees	0 00	0 00
(b) Political Party Committees	0 00	0 00
(c) Other Political Committees (such as PACs)	0 00	0 00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c))	0 00	0 00
29. Other Disbursements	0 00	0 00
30. Federal Election Activity (2 U.S.C. 431(20))		
(a) Shared Federal Election Activity (from Schedule H6)		
(i) Federal Share	0 00	0 00
(ii) "Levin" Share	0 00	0 00
(b) Federal Election Activity Paid Entirely With Federal Funds	0 00	0 00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))	0 00	0 00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))	75279 05	75279 05
32. Total Federal Disbursements (subtract Line 21(a)(ii) from Line 30(a)(ii) from Line 31)	75279 05	75279 05



## TELECON

**Committee Name:** National Italian American PAC

**Contact Name:** Vincent LaSorsa

**Contact Phone:**

**AF #:** 1130

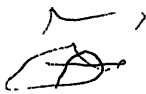
**Subject:** RO Recommendation

**May 4, 2005 – Jennifer H. Boyt**

Left a message that the RO Rec was sent on 4/28, and that if the Treasurer or Committee or Mr. LaSorsa wished to respond to it, a response was due in the Commission Secretary's office, via fax, by May 8, 2005. I stated that a response is not mandatory, but is the last chance of the respondents to put forth the arguments previously made in the challenge to the Commission, prior to the final determination vote. I stated that if there were any questions, they could call OAR and receive assistance.

**May 5, 2005 – Mary Seiler**

A committee representative returned Jennifer Boyt's call. He said that he just got the recommendation and the response is due Sunday. He wanted to know if he could send it Monday. I said that was fine as long as it was received by COB on Monday.





FEDERAL ELECTION COMMISSION  
Washington, DC 20463

*Ryan*  
**SENSITIVE**

DATE & TIME OF TRANSMITTAL: Tuesday, May 17, 2005 11:00

BALLOT DEADLINE: Friday, May 20, 2005 4:00

COMMISSIONER: MASON, McDONALD, SMITH, THOMAS, TONER, WEINTRAUB

SUBJECT: **Final Determination Recommendation in AF #1130 – National Italian American Political Action Committee and Vincent M. Lasorsa, CPA, MBA, as treasurer (C00355388). Memorandum from The Reviewing Officer, Office of Administrative Review dated May 16, 2005.**

- ☐ I approve the recommendation(s)
- ☐ I object to the recommendation(s)
- ☐ I abstain from voting on the recommendation(s)
- ☐ I am recused from voting on the recommendation(s)
- ☐ I am not voting on this tally.

A definite vote is required. All ballots must be signed and dated. Please return **ONLY THE BALLOT** to the Commission Secretary. Please return ballot no later than date and time shown above.

DATE: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION





FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2005 MAY 17 A 9:41

May 16, 2005

**SENSITIVE**

MEMORANDUM

TO: THE COMMISSION

THROUGH: JAMES A. PEHRKON *AC/mjp*  
STAFF DIRECTOR

ANTHONY P. SCARDINO *AS*  
DEPUTY STAFF DIRECTOR

FROM: SHAWN WOODHEAD WERTH *SW*  
REVIEWING OFFICER  
OFFICE OF ADMINISTRATIVE REVIEW

SUBJECT: FINAL DETERMINATION RECOMMENDATION IN AF# 1130 -  
NATIONAL ITALIAN AMERICAN POLITICAL ACTION  
COMMITTEE AND VINCENT M. LASORSA, CPA, MBA,  
AS TREASURER (C00355388)

On June 10, 2004, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that the National Italian American Political Action Committee and Vincent M. LaSorsa, CPA, MBA, as Treasurer ("the respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2004 April Quarterly Report. Because the respondents had not filed the report at the time of the Commission's RTB finding, the estimated level of activity was used to calculate the civil money penalty. Therefore, the Commission also made a preliminary determination that the civil money penalty was \$2,475 based on the schedule of penalties at 11 C.F.R. § 111.43.

On June 17, 2004, the respondents electronically filed the April Quarterly Report, 63 days late, which is considered not filed for purposes of the civil money penalty calculation. The report discloses \$77,529 in total receipts and \$75,279 in total disbursements. Had the report been filed prior to the Commission's RTB finding, the civil money penalty would have been  $\$5,500 \times [1 + (.25 \times 7)]$  or \$15,125 based on the schedule of penalties at 11 C.F.R. § 111.43(a)(2)(iii).

On July 20, 2004 the Commission received the respondents' written response and supporting documentation ("challenge"). After reviewing the challenge, the Reviewing Officer's recommendation dated April 28, 2005 was forwarded to the Commission. A

copy was simultaneously forwarded to the respondents. The Reviewing Officer recommended that the Commission make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$2,475 based on the proposed RTB civil money penalty of which the respondents were notified and upon which they based their challenge.

Within 10 days of transmittal of the recommendation, the respondents may file a written response with the Commission Secretary which may not raise any arguments not raised in the respondents' challenge or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). As of this date, a written response has not been received from the respondents.

### **OAR Recommendations**

- (1) Make a final determination in AF# 1130 that the National Italian American Political Action Committee and Vincent M. LaSorsa, CPA, MBA, as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$2,475; and
- (2) Send the appropriate letter.

Staff Assigned: Jennifer H. Boyt

AF 1325

25190262624

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WESTERN UNION COMMERCIAL SERVICES  
TO: ANTHONY N. MALLACE CPA J.D.  
NATIONAL ITALIAN AMERICAN POLITICAL ACTI  
1205 LOCUST ST  
PHILADELPHIA PA 19107-5457

FEDERAL ELECTION COMMISSION  
DAYNA BROWN  
999 E ST NW # 709  
WASHINGTON DC 20463

APRIL 4, 2005

ANTHONY N. MALLACE CPA J.D.  
NATIONAL ITALIAN AMERICAN POLITICAL ACTI  
1205 LOCUST STREET  
PHILADELPHIA PA 19107

C00355388  
AF#: 1325

DEAR ANTHONY N. MALLACE CPA J.D.:

THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED ("THE ACT"), REQUIRES THAT YOUR COMMITTEE FILE A 30 DAY POST-GENERAL REPORT OF RECEIPTS AND DISBURSEMENTS IN A CALENDAR YEAR IN WHICH A REGULARLY SCHEDULED GENERAL ELECTION IS HELD. THIS REPORT, COVERING THE PERIOD THROUGH NOVEMBER 22ND, SHALL BE FILED NO LATER THAN DECEMBER 2ND. 2 U.S.C. 434(A). YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT. RECORDS AT THE FEDERAL ELECTION COMMISSION ("FEC") INDICATE THAT THIS REPORT WAS NOT FILED WITHIN THIRTY (30) DAYS OF THE DUE DATE. YOU SHOULD FILE THE REPORT IF YOU HAVE NOT ALREADY DONE SO.

THE ACT WAS FURTHER AMENDED IN 1999 TO PERMIT THE FEC TO IMPOSE CIVIL MONEY PENALTIES FOR VIOLATIONS OF THE REPORTING REQUIREMENTS OF 2 U.S.C. 434(A). 2 U.S.C. 437G(A)(4). ON 04/01/2005, THE FEC FOUND THAT THERE IS REASON TO BELIEVE ("RTB") THAT NATIONAL ITALIAN AMERICAN POLITICAL ACTI AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) BY FAILING TO FILE TIMELY THIS REPORT ON OR BEFORE DECEMBER 2ND. BASED ON THE FEC'S SCHEDULES OF CIVIL MONEY PENALTIES AT 11 C.F.R. 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT THE RTB STAGE IS \$6750. IT IS DUE BY 05/11/2005 AND IS BASED ON THESE FACTORS:

ELECTION SENSITIVITY OF REPORT: NOT ELECTION SENSITIVE  
LEVEL OF ACTIVITY: \$69718  
NUMBER OF DAYS LATE: NOT FILED  
NUMBER OF PREVIOUS CIVIL MONEY PENALTIES ASSESSED: 6

TO PAY THE CALCULATED CIVIL MONEY PENALTY

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TO PAY THE CALCULATED CIVIL MONEY PENALTY, SEND THE ENCLOSED REMITTANCE AND YOUR PAYMENT TO THE FEC AT THE ADDRESS ON PAGE 3. UPON RECEIPT OF YOUR PAYMENT, THE FEC WILL SEND YOU A FINAL DETERMINATION LETTER.

TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY, YOU MUST SUBMIT A WRITTEN RESPONSE, INCLUDING THE AF# FOUND ON PAGE ONE, TO THE FEC'S OFFICE OF ADMINISTRATIVE REVIEW, 999 E STREET, NW, WASHINGTON, DC 20463. YOUR RESPONSE MUST BE RECEIVED BY 05/11/2005. YOUR WRITTEN RESPONSE MUST INCLUDE THE REASON(S) WHY YOU ARE CHALLENGING THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY. THE FEC WILL ONLY CONSIDER CHALLENGES THAT ARE BASED ON A FACTUAL ERROR, MISCALCULATION OF THE CALCULATED CIVIL MONEY PENALTY BY THE FEC, OR THE EXISTENCE OF EXTRAORDINARY CIRCUMSTANCES THAT PERSISTED FOR MORE THAN 48 HOURS THAT WERE BEYOND YOUR CONTROL AND PREVENTED YOU FROM FILING THE REPORT IN A TIMELY MANNER. YOUR RESPONSE MUST INCLUDE THE FACTUAL BASIS SUPPORTING THE REASON(S) AND SUPPORTING DOCUMENTATION. THE FEC STRONGLY ENCOURAGES THAT DOCUMENTS BE SUBMITTED IN THE FORM OF AFFIDAVITS OR DECLARATIONS. EXAMPLES OF CIRCUMSTANCES THAT WILL NOT BE CONSIDERED EXTRAORDINARY INCLUDE, BUT ARE NOT LIMITED TO, NEGLIGENCE, PROBLEMS WITH VENDORS OR CONTRACTORS, STAFF ILLNESS, COMPUTER FAILURES AND SIMILAR CIRCUMSTANCES. 11 C.F.R. 111.35(B)(1)(III) AND (4).

YOUR FAILURE TO RAISE AN ARGUMENT IN A TIMELY FASHION DURING THE ADMINISTRATIVE PROCESS SHALL BE DEEMED A WAIVER OF YOUR RIGHT TO PRESENT SUCH ARGUMENT IN A PETITION TO THE DISTRICT COURT UNDER 2 U.S.C. 437G. 11 C.F.R. 111.38.

IF YOU INTEND TO BE REPRESENTED BY COUNSEL, PLEASE ADVISE THE OFFICE OF ADMINISTRATIVE REVIEW. YOU SHOULD PROVIDE, IN WRITING, THE NAME, ADDRESS AND TELEPHONE NUMBER OF YOUR COUNSEL AND AUTHORIZE COUNSEL TO RECEIVE NOTIFICATIONS AND COMMUNICATIONS RELATING TO THIS CHALLENGE AND IMPOSITION OF THE CALCULATED CIVIL MONEY PENALTY.

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A CHALLENGE

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A WRITTEN RESPONSE, THE FEC WILL ASSUME THAT THE PRECEDING FACTUAL ALLEGATIONS ARE TRUE AND MAKE A FINAL DETERMINATION THAT NATIONAL ITALIAN AMERICAN POLITICAL ACTI AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) AND ASSESS A CIVIL MONEY PENALTY.

UNPAID CIVIL MONEY PENALTIES ASSESSED THROUGH THE ADMINISTRATIVE FINE REGULATIONS WILL BE SUBJECT TO THE DEBT COLLECTION ACT OF 1982("DCA")AS AMENDED BY THE DEBT COLLECTION IMPROVEMENT ACT OF 1996, 31 U.S.C. 3701 ET SEQ. THE FEC MAY TAKE ANY AND ALL APPROPRIATE ACTION AUTHORIZED AND REQUIRED BY THE DCA, AS AMENDED, INCLUDING TRANSFER TO THE U.S. DEPARTMENT OF THE TREASURY FOR COLLECTION. 11 C.F.R. 111.45.

THIS MATTER WAS GENERATED BASED ON INFORMATION ASCERTAINED BY THE FEC IN THE NORMAL COURSE OF CARRYING OUT ITS SUPERVISORY RESPONSIBILITIES. 2 U.S.C. 437G(A)(2). IT WILL REMAIN CONFIDENTIAL IN ACCORDANCE WITH 2 U.S.C. 437G(A)(4)(B) AND 437G(A)(12)(A) UNTIL IT IS PLACED ON THE PUBLIC RECORD IN ACCORDANCE WITH 11 C.F.R. 111.42, UNLESS YOU NOTIFY THE FEC IN WRITING THAT YOU WISH THE

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MATTER TO BE MADE PUBLIC.

ADDITIONAL INFORMATION ON THE FEC'S ADMINISTRATIVE FINE PROGRAM, INCLUDING THE FINAL REGULATIONS, IS LOCATED AT THE FEC'S WEBSITE AT WWW.FEC.GOV. IF YOU HAVE QUESTIONS REGARDING THE PAYMENT OF THE CALCULATED CIVIL MONEY PENALTY, PLEASE CONTACT DAYNA C. BROWN IN THE REPORTS ANALYSIS DIVISION AT OUR TOLL FREE NUMBER (800)424-9530 (AT THE PROMPT, PRESS 5) OR (202)694-1130. IF YOU HAVE QUESTIONS REGARDING THE SUBMISSION OF A CHALLENGE, PLEASE CONTACT THE OFFICE OF ADMINISTRATIVE REVIEW AT OUR TOLL FREE NUMBER (800)424-9530 (PRESS 0, THEN EXT. 1660) OR (202)694-1660.

SINCERELY,

SCOTT E. THOMAS  
CHAIRMAN\* \* \* \* \*  
ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 C.F.R. 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT RTB IS \$6750 FOR THE 2004 30 DAY POST-GENERAL REPORT.

PLEASE MAIL THIS REMITTANCE WITH A CHECK OR MONEY ORDER MADE PAYABLE TO THE FEDERAL ELECTION COMMISSION TO THE FOLLOWING ADDRESS:  
FEDERAL ELECTION COMMISSION  
P.O. BOX 952182  
ST. LOUIS, MO 63195-2182

IF YOU CHOOSE TO SEND YOUR REMITTANCE AND PAYMENT BY COURIER OR OVERNIGHT DELIVERY, PLEASE USE THIS ADDRESS:  
U.S. BANK - GOVERNMENT LOCKBOX  
FEC #952182  
1005 CONVENTION PLAZA  
ST. LOUIS, MO 63101

THE REMITTANCE AND YOUR PAYMENT ARE DUE BY 05/11/2005. UPON RECEIPT OF YOUR REMITTANCE AND PAYMENT, THE FEC WILL SEND YOU A FINAL DETERMINATION LETTER.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT  
-----

FOR: NATIONAL ITALIAN AMERICAN POLITICAL ACTI

FEC ID#: C00355388

AF#: 1325

PAYMENT DUE DATE: 05/11/2005

PAYMENT AMOUNT DUE: \$6750



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS, FOLD AT BOTTOM LINE

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

ANTHONY N. MALLACE CRAJ  
NATIONAL ITALIAN AMERICAN POLITICAL ACTI  
1205 LOCUST ST  
PHILADELPHIA PA 19107-5457

2. Article Number  
(Transfer from service label)

7002 3150 0000 8333 5701

PS Form 3811, August 2001

Domestic Return Receipt

2ACPRI-03-Z-0985

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

#1325

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

AF 1386

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TG: ANTHONY N. MALLACE CPA J.D.  
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1205 LOCUST ST  
PHILADELPHIA PA 19107-5457

FEDERAL ELECTION COMMISSION  
DAYNA BROWN  
999 E ST NW # 709  
WASHINGTON DC 20463

APRIL 28, 2005

ANTHONY N. MALLACE CPA J.D.  
NATIONAL ITALIAN AMERICAN POLITICAL ACTI  
1205 LOCUST STREET  
PHILADELPHIA PA 19107

C00355388  
AF#: 1386

DEAR ANTHONY N. MALLACE CPA J.D.:

THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED ("THE ACT"), REQUIRES THAT YOUR COMMITTEE FILE A YEAR END REPORT OF RECEIPTS AND DISBURSEMENTS EVERY CALENDAR YEAR. THIS REPORT, COVERING THE PERIOD THROUGH DECEMBER 31ST, SHALL BE FILED NO LATER THAN JANUARY 31ST. 2 U.S.C. 434(A). YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT. RECORDS AT THE FEDERAL ELECTION COMMISSION ("FEC") INDICATE THAT THIS REPORT WAS NOT FILED WITHIN THIRTY (30) DAYS OF THE DUE DATE. YOU SHOULD FILE THIS REPORT IF YOU HAVE NOT ALREADY DONE SO.

THE ACT WAS FURTHER AMENDED IN 1999 TO PERMIT THE FEC TO IMPOSE CIVIL MONEY PENALTIES FOR VIOLATIONS OF THE REPORTING REQUIREMENTS OF 2 U.S.C. 434(A). 2 U.S.C. 437G(A)(4). ON 04/27/2005, THE FEC FOUND THAT THERE IS REASON TO BELIEVE ("RTB") THAT NATIONAL ITALIAN AMERICAN POLITICAL ACTI AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) BY FAILING TO FILE TIMELY THIS REPORT ON OR BEFORE JANUARY 31ST. BASED ON THE FEC'S SCHEDULES OF CIVIL MONEY PENALTIES AT 11 C.F.R. 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT THE RTB STAGE IS \$687. IT IS DUE BY 06/06/2005 AND IS BASED ON THESE FACTORS:

ELECTION SENSITIVITY OF REPORT: NOT ELECTION SENSITIVE  
LEVEL OF ACTIVITY: \$775  
NUMBER OF DAYS LATE: NOT FILED  
NUMBER OF PREVIOUS CIVIL MONEY PENALTIES ASSESSED: 7

TO PAY THE CALCULATED CIVIL MONEY PENALTY  
TO PAY THE CALCULATED CIVIL MONEY PENALTY, SEND THE ENCLOSED

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REMITTANCE AND YOUR PAYMENT TO THE FEC AT THE ADDRESS ON PAGE 3.  
UPON RECEIPT OF YOUR PAYMENT, THE FEC WILL SEND YOU A FINAL  
DETERMINATION LETTER.

TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY  
TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY  
PENALTY, YOU MUST SUBMIT A WRITTEN RESPONSE, INCLUDING THE AF# FOUND  
ON PAGE ONE, TO THE FEC'S OFFICE OF ADMINISTRATIVE REVIEW, 999 E  
STREET, NW, WASHINGTON, DC 20463. YOUR RESPONSE MUST BE RECEIVED  
BY 06/06/2005. YOUR WRITTEN RESPONSE MUST INCLUDE THE REASON(S) WHY  
YOU ARE CHALLENGING THE RTB FINDING AND/OR CALCULATED CIVIL MONEY  
PENALTY. THE FEC WILL ONLY CONSIDER CHALLENGES THAT ARE BASED ON A  
FACTUAL ERROR, MISCALCULATION OF THE CALCULATED CIVIL MONEY PENALTY  
BY THE FEC, OR THE EXISTENCE OF EXTRAORDINARY CIRCUMSTANCES THAT  
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RESPONSE MUST INCLUDE THE FACTUAL BASIS SUPPORTING THE REASON(S) AND  
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CIRCUMSTANCES. 11 C.F.R. 111.35(B)(1)(III) AND (4).

YOUR FAILURE TO RAISE AN ARGUMENT IN A TIMELY FASHION DURING THE  
ADMINISTRATIVE PROCESS SHALL BE DEEMED A WAIVER OF YOUR RIGHT TO  
PRESENT SUCH ARGUMENT IN A PETITION TO THE DISTRICT COURT UNDER 2  
U.S.C. 437G. 11 C.F.R. 111.38.

IF YOU INTEND TO BE REPRESENTED BY COUNSEL, PLEASE ADVISE THE  
OFFICE OF ADMINISTRATIVE REVIEW. YOU SHOULD PROVIDE, IN WRITING,  
THE NAME, ADDRESS AND TELEPHONE NUMBER OF YOUR COUNSEL AND AUTHORIZE  
COUNSEL TO RECEIVE NOTIFICATIONS AND COMMUNICATIONS RELATING TO THIS  
CHALLENGE AND IMPOSITION OF THE CALCULATED CIVIL MONEY PENALTY.

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A  
CHALLENGE

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A  
WRITTEN RESPONSE, THE FEC WILL ASSUME THAT THE PRECEDING FACTUAL  
ALLEGATIONS ARE TRUE AND MAKE A FINAL DETERMINATION THAT NATIONAL  
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UNPAID CIVIL MONEY PENALTIES ASSESSED THROUGH THE ADMINISTRATIVE  
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INCLUDING TRANSFER TO THE U.S. DEPARTMENT OF THE TREASURY FOR  
COLLECTION. 11 C.F.R. 111.45.

THIS MATTER WAS GENERATED BASED ON INFORMATION ASCERTAINED BY  
THE FEC IN THE NORMAL COURSE OF CARRYING OUT ITS SUPERVISORY  
RESPONSIBILITIES. 2 U.S.C. 437G(A)(2). IT WILL REMAIN CONFIDENTIAL  
IN ACCORDANCE WITH 2 U.S.C. 437G(A)(4)(B) AND 437G(A)(12)(A) UNTIL  
IT IS PLACED ON THE PUBLIC RECORD IN ACCORDANCE WITH 11 C.F.R.  
111.42, UNLESS YOU NOTIFY THE FEC IN WRITING THAT YOU WISH THE  
MATTER TO BE MADE PUBLIC.

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ADDITIONAL INFORMATION ON THE FEC'S ADMINISTRATIVE FINE PROGRAM, INCLUDING THE FINAL REGULATIONS, IS LOCATED AT THE FEC'S WEBSITE AT WWW.FEC.GOV. IF YOU HAVE QUESTIONS REGARDING THE PAYMENT OF THE CALCULATED CIVIL MONEY PENALTY, PLEASE CONTACT DAYNA C. BROWN IN THE REPORTS ANALYSIS DIVISION AT OUR TOLL FREE NUMBER (800)424-9530 (AT THE PROMPT, PRESS 5) OR (202)694-1130. IF YOU HAVE QUESTIONS REGARDING THE SUBMISSION OF A CHALLENGE, PLEASE CONTACT THE OFFICE OF ADMINISTRATIVE REVIEW AT OUR TOLL FREE NUMBER (800)424-9530 (PRESS 0, THEN EXT. 1660) OR (202)694-1660.

SINCERELY,

SCOTT E. THOMAS  
CHAIRMAN

\* \* \* \* \*  
**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 C.F.R. 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT RTB IS \$687 FOR THE 2004 YEAR-END REPORT.

PLEASE MAIL THIS REMITTANCE WITH A CHECK OR MONEY ORDER MADE PAYABLE TO THE FEDERAL ELECTION COMMISSION TO THE FOLLOWING ADDRESS:  
FEDERAL ELECTION COMMISSION  
P.O. BOX 952182  
ST. LOUIS, MO 63195-2182

IF YOU CHOOSE TO SEND YOUR REMITTANCE AND PAYMENT BY COURIER OR OVERNIGHT DELIVERY, PLEASE USE THIS ADDRESS:  
U.S. BANK - GOVERNMENT LOCKBOX  
FEC #952182  
1005 CONVENTION PLAZA  
ST. LOUIS, MO 63101

THE REMITTANCE AND YOUR PAYMENT ARE DUE BY 06/06/2005. UPON RECEIPT OF YOUR REMITTANCE AND PAYMENT, THE FEC WILL SEND YOU A FINAL DETERMINATION LETTER.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT  
-----

FOR: NATIONAL ITALIAN AMERICAN POLITICAL ACTI

FEC ID#: C00355388

AF#: 1386

PAYMENT DUE DATE: 06/06/2005

PAYMENT AMOUNT DUE: \$687

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

**1. Article Addressed to:**

Anthony N. Mallace CPA  
J.D.  
National Italian American  
Political Acti.  
1205 Locust St.  
Philadelphia PA 19107

**2. Article Number**

(Transfer from service label)

7002 3150 0000 8333 5800

PS Form 3811, A

7002 3150 0000 8333 5800

**COMPLETE THIS SECTION ON DELIVERY**

**A. Signature**

*[Handwritten Signature]*

☐ Agent

☐ Addressee

**B. Received by (Printed Name)**

**C. Date of Delivery**

4/20/00

**D. Is delivery address different from item 1?**

☐ Yes

If YES, enter delivery address below:

☐ No

#1280

**3. Service Type**

☒ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

**4. Restricted Delivery? (Extra Fee)**

☐ Yes

2ACPRI-03-Z-0985