



# Local Union No. 98

## INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS

1701 Spring Garden Street  
Philadelphia, Pennsylvania 19130

Phone: 215-563-5592  
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January 26, 2006

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

Re: ADR 302  
International Brotherhood of Electrical Workers Local 98 Committee on Political  
Education and John Dougherty, Treasurer

RECEIVED  
FEC MAIL  
OPERATIONS CENTER  
2006 JAN 27 P 12:08

Dear Ms. Fraser:

As communicated in your correspondence, it is our contention that we misinterpreted the FECA reporting requirements for independent expenditures by thinking that their disclosure on Schedule E was in compliance with FECA regulations. Upon having received notice of the unintentional error, we filed the necessary reports in a timely fashion.

In addition, we have developed a policy to ensure that this untimely reporting will not occur again and there will be future compliance in the reporting of independent expenditures within the mandated notice requirements. The policy that has been implemented is as follows:

1. The Respondents and Political Action Director will immediately notify the Financial Office when there is an independent expenditure.
2. Letters have been forwarded to all of our "Committee" vendors notifying them of FEC requirements for independent expenditures and their cooperation in notifying the Financial Office when they receive any order that will trigger an independent expenditure. (Exhibit "A")
3. Upon receiving this information from the aforementioned parties, the Financial Office will file the required 24 and 48 hour reports.

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In consideration of our prompt compliance with your previous notice of untimely reporting on two incidents and the implementation of our policy, we would stipulate to a minimal monetary assessment for each of the two infractions (e.g. \$100.00 per incident) and possibly a letter of warning placing respondents on notice that any future untimely reporting may result in stricter penalties.

I hope our response will facilitate a resolution of this matter. I will call in the near future to arrange a date and time in which we can discuss this matter in further detail.

Thank you for your kind courtesy and cooperation in this regard.

Sincerely,

A handwritten signature in cursive script that reads "Pasquale Bianculli".

Pasquale Bianculli, Esquire

PB/emm-c

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