

REPORTS ANALYSIS REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: May 18, 2007

ANALYST: Michael H. Hartsock

- I. COMMITTEE: International Association of Fire Fighters
C70003108
Vincent J. Bollon, Treasurer
1750 New York Avenue, N.W.
Washington, DC 20006
- II. RELEVANT STATUTE: 2 U.S.C. §431(9)(B)(iii)
11 C.F.R. §100.134(a)
11 C.F.R. §104.6
11 C.F.R. §114.5(e)(2)(i)

III. BACKGROUND:

Partisan Internal Communications (FORM 7 -Failure to Disclose Financial Activity)

International Association of Fire Fighters ("the Organization") filed an Amended 2006 12 Day Pre-General Report on November 6, 2006 which disclosed additional communication costs totaling \$94,226.00 (Attachment 2).

On October 23, 2006, the Organization filed its original 2006 12 Day Pre-General Report covering the period of October 1, 2006 through October 18, 2006 (FEC FORM 7). This original report disclosed \$681.50 in communication costs (Image 26039242289).

On November 6, 2006, the Organization filed an Amended 2006 12 Day Pre-General Report covering the period of October 1, 2006 through October 18, 2006. The amended report disclosed \$94,907.50 in communication costs for direct mail to its members (Image 26039271374-99).

On December 13, 2006, a Request for Additional Information ("RFAI") was sent to the Organization referencing the Amended 2006 12 Day Pre-General Report, received

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on November 6, 2006. The RFAI requested clarification regarding the \$94,226.00 in additional communication costs that were not disclosed on the Organization's original 2006 12 Day Pre-General Report (Image 26039311111).

On January 16, 2007, the Organization filed a letter referencing the Amended 2006 12 Day Pre-General Report which stated in part:

"Due to a miscommunication between IAFF staff and the consulting firm used to prepare the reports, the information on the additional internal communications disclosed on the amended pre-general report was not provided at the time the original report was filed. Once the miscommunication was discovered, IAFF immediately filed an amendment that disclosed the correct total. Action has been taken to educate staff and improve procedures to insure *[sic]* that this does not happen in the future." (Image 27039341571)

On January 29, 2007, the RAD analyst called Mr. Vincent Bollon, the Organization's treasurer; however, Mr. Bollon was unavailable. The Analyst left Mr. Bollon a voicemail requesting that he return the call as soon as possible to discuss the increase in activity on the Organization's Amended 2006 12 Day Pre-General Report, received on November 6, 2006 (Attachment 3).

On January 31, 2007, Ms. Jennifer Lebin, a consultant to the Organization, returned the RAD analyst's call on Mr. Bollon's behalf. The Analyst advised Ms. Lebin that the Organization's increase in communication costs disclosed on its Amended 2006 12 Day Pre-General Report, received on November 6, 2006, was referable to the Alternative Dispute Resolution Office (ADRO). The RAD analyst explained to Ms. Lebin that an attempt was made to contact Mr. Bollon to see if the Organization had any additional information to provide the Commission regarding this matter. Ms. Lebin stated that she did not believe the Organization had any additional information to provide to the Commission and that she would have Mr. Bollon call the RAD analyst as soon as possible (Attachment 3).

On February 6, 2006, Mr. Bollon called the RAD analyst. The RAD analyst explained to Mr. Bollon that the \$94,226 increase in communication costs on the Amended 2006 12 Day Pre-General Report, received on November 6, 2006, was referable to the Office of Alternative Dispute Resolution. Mr. Bollon understood the situation and stated that the Organization explained the increase in financial activity on the Amended 12 Day Pre-General Report in a letter sent to the Commission on January 16, 2007. The RAD analyst advised Mr. Bollon that if the Organization had any further clarification regarding the matter, it must be received by the Commission no later than February 9, 2006 (Attachment 3).

To date, no further communication has been received from the Organization regarding this matter.

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