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April 6, 2000

BY FACSIMILE

Ms. Erica McMahon
Federal Election Commission
Washington, D.C. 20463

Re: MUR 4990

(Graphic Communications International Union
Political Contributions Committee)

Dear Ms. McMahon:

We are counsel to the Graphic Communications International Union, AFL-CIO, CLC and its Political Contributions Committee (the "PCC").

Enclosed is the Statement of Designation of Counsel, executed by Gerald H. Deneau, Secretary to the PCC, and Secretary-Treasurer of the GCIU.

The GCIU PCC is willing to enter into the Conciliation Agreement. However, we wish to point out that the failure to file on a timely basis was not intentional. Rather, it was due to one employee having sole responsibility for completing and filing the forms on a timely basis, and being out for extended periods for medical reasons. The GCIU has now recognized that there was a breakdown both in supervision and allocation of that person's work and has taken steps to correct this. The supervisor of that department now has responsibility for ensuring both that FEC forms will be filed on time by the employee assigned that work, and for assigning that person's work to others in the event of illness.

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COMMISSION
OFFICE OF GENERAL
COUNSEL

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In addition, it appears that notice letters from the FEC, advising of late filings were not given to the Secretary of the PCC to read and respond, but were directed to the employee responsible for the filings. Thus, the error of untimely filings was compounded by the notices being sent to the employee who was out on medical leave and unable to file the forms in the first place.

Sincerely,

O'DONNELL, SCHWARTZ & ANDERSON, P.C.

By Mart R. Ganzglass
Martin R. Ganzglass

cc: Gerald H. Deneau
Secretary
(with enclosure)

20-04-398-0900

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4990

NAME OF COUNSEL: Martin R. Ganzglass

ADDRESS: O'Donnell, Schwartz & Anderson, P.C.

Suite 707

1900 L Street, N.W.

TELEPHONE:

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(202) 898-1824

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

April 5, 2000
Date

Gerald Deneau
Signature Gerald Deneau

RESPONDENT'S NAME: Graphic Communications International Union, AFL-CIO

ADDRESS: 1900 L Street, N.W.

Washington, DC 20036

HOME PHONE:

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2004-03-10 10:00:00