



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

OCT - 8 2004

Mr. Clyde Elrod
Tom Barlow for Congress
1 Executive Blvd.
Paducah, KY 42201

Dear Mr. Elrod:

In the normal course of carrying out its supervisory responsibilities, the Federal Election Commission discovered that Tom Barlow for Congress and you, as treasurer, may have accepted prohibited contributions from a labor organization. Specifically, information before the Commission showed that the Kentucky State District Council of Carpenters ("KSDCC") made in-kind contributions to Tom Barlow for Congress in 1998.

KSDCC made in-kind contributions by requiring its paid employees, known as field representatives, to provide services for Tom Barlow for Congress that were directed to the general public. These services may have included posting campaign signs, participating in precinct walks, operating phone banks, distributing handbills, and attending campaign rallies, debates, and press conferences. Field representatives performed these services as part of their official job responsibilities for the union.

The Federal Election Campaign Act, as amended, prohibits any person from knowingly accepting a contribution from a labor organization. *See* 2 U.S.C. § 441b. The Commission admonishes you that Tom Barlow for Congress's actions appear to violate the Act. Tom Barlow for Congress and you, as treasurer, should take action to prevent such violations from occurring in the future. If you have any questions, please contact Brant Levine, the attorney assigned to this matter, at (202) 694-1572.

Sincerely,

Lawrence H. Norton
General Counsel

A handwritten signature in dark ink, appearing to read "Lawrence L. Calvert Jr.", is written over a horizontal line.

-BY: Lawrence L. Calvert Jr.
Deputy Associate General Counsel for Enforcement