



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 1193

DATE SCANNED

4/26/06

SCANNER NO.

2

SCAN OPERATOR

SES

26092584636



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEDERAL ELECTION
COMMISSION
SECRETARIAT

2004 DEC -1 P 1:08

December 1, 2004

MEMORANDUM

SENSITIVE

TO: THE COMMISSION

THROUGH: JAMES A. PEHRKON
STAFF DIRECTOR

ROBERT J. COSTA
DEPUTY STAFF DIRECTOR

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

SUBJECT: REASON TO BELIEVE RECOMMENDATION – 2004 (ELECTION-SENSITIVE) OCTOBER QUARTERLY REPORT FOR THE ADMINISTRATIVE FINES PROGRAM

Attached is a list of political committees and their treasurers who failed to file or failed to timely file, the 2004 October Quarterly Report in accordance with 2 U.S.C. 434(a). On September 20, 2004, Prior Notice was sent to all political committees and their treasurers, informing them that the October Quarterly Report was due on October 15, 2004. The report should have covered the period ending on September 30, 2004.

Under the Administrative Fines Program, the October Quarterly Report is considered an election-sensitive filing for authorized committees supporting candidates involved in the general election as well as all unauthorized committees. For the committees listed on the attached RTB Circulation Report, the October Quarterly Report was an election-sensitive filing. The committees either filed the report more than five (5) days after the due date, failed to file the report or failed to file the report prior to four (4) days before the general election (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 C.F.R. 111.43, these committees should be assessed the civil money penalties included on the attached report.

Recommendation

- (1) Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Report violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
- (2) Send the appropriate mailgrams.

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AF #	COMMITTEE NAME	COMMITTEE ID	RECEIPT DATE	TRASURER	DAYS LATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF01186	BYRON FOR CONGRESS	C00382135	11/09/2004	RAMONA BYRON	Not Filed	\$12,747	\$112,467	CA	BYRON, MICHAEL	Yes	0	\$900
AF01188	HONEST ABE HIRSCHFELD FOR UNITED STATES SENATE	C00393538	Not Filed	GEORGE L ESPADA		\$789,293 (est)	\$789,293	NY	HIRSCHFELD, ABRAHAM	Yes	2	\$21,000
AF01189	SAN ANTONIO POLICE OFFICERS ASSOCIATION POLITICAL ACTION COMMITTEE	C00396655	10/21/2004	Morgan, Clifford Mr.	6	\$144,865	\$252,340	TX		Yes	0	\$1,650
AF01190	AMERICAN PUBLIC POWER ASSOCIATION PUBLIC OWNERSHIP OF ELECTRIC RE	C00161570	10/27/2004	P BIANCA DOWALLY	12	\$28,700	\$172,422	DC		Yes	0	\$600
AF01191	CITY POLITICAL ACTION COMMITTEE (CITY PAC)	C00187526	10/21/2004	KENNETH M. SACKOVER	6	\$67,227	\$303,176	IL		Yes	2	\$1,350
AF01192	GILLETTE COMPANY POLITICAL ACTION COMMITTEE THE	C00375808	10/27/2004	Gatlin, John Mr.	12	\$13,765	\$139,266	MA		Yes	0	\$270
AF01193	IRISH AMERICAN DEMOCRATS	C00320432	10/28/2004	CATHERINE STELLA O'LEARY	13	\$52,250	\$176,078	MD		Yes	0	\$1,425
AF01194	SOVEREIGN BANCORP INC PAC	C00327072	10/26/2004	RICHARD E KOSAK	11	\$11,025	\$164,155	PA		Yes	0	\$260

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FEDERAL ELECTION COMMISSION 2003-2004
Reason to Believe Circulation Report
2004 OCTOBER QUARTERLY

DATE 12/01/2004
PAGE: 2

AF #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	DAYS LATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF01195	VERIZON COMMUNICATION INC GOOD GOVT CLUB							PA				
		C00186288	JOAN SIMPSON	10/26/2004	11	\$241,056	\$2,372,300		Yes	0		\$3,425
AF01196	WESTERN GROWERS ASSOCIATION POLITICAL ACTION COMMITTEE FEDERAL							CA				
		C00193979	HARVEY LABKO	10/21/2004	6	\$31,375	\$153,474		Yes	0		\$450
AF01197	SHELBY COUNTY DEMOCRATIC EXECUTIVE COMMITTEE							TN				
		C00406793	MYRA STILES	10/21/2004	6	\$144,885	\$167,537		Yes	0		\$1,650
AF01198	BRANCH COUNTY REPUBLICAN COMMITTEE							MI				
		C00000992	RONALD E SAMPSEL	10/21/2004	6	\$32,768	\$112,200		Yes	0		\$450
AF01199	DRAFT CLARK 2004 FOR PRESIDENT COMMITTEE							CA				
		C00387712	GEORGE OTEY			\$109,220 (est)	\$218,440		Yes	0		\$5,000
AF01200	CHESAPEAKE FED PAC							OK				
		C00389288	Price, Tom	11/05/2004		\$93,519	\$153,830		Yes	0		\$4,000
AF01201	COLONIAL BANGGROUP INC FEDERAL POLITICAL ACTION COMMITTEE (COLONI							AL				
		C00309526	GLENDAL ALFRED			\$35,426 (est)	\$141,709		Yes	2		\$2,100
AF01202	CONGRESSIONAL BLACK CAUCUS POLITICAL ACTION COMMITTEE (CBC-PAC)							DC				
		C00147512	Arthur R. Collins			\$91,035 (est)	\$455,180		Yes	4		\$8,000
AF01203	EDO CORPORATION PAC							NY				
		C00329318	WILLIAM J FROST	11/19/2004		\$23,032	\$113,830		Yes	0		\$900
AF01204	INDEPENDENT ACTION INC							DC				
		C00139741	RALPH SANTORA	11/13/2004		\$95,400	\$466,059		Yes	0		\$4,000

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FEDERAL ELECTION COMMISSION 2003-2004
Reason to Believe Circulation Report
2004 OCTOBER QUARTERLYDATE 12/01/2004
PAGE: 3

AF #	COMMITTEE NAME	COMMITTEE ID	RECEIPT DATE	TREASURER	DAYS LATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF01205	RCG PAC	C00382101	11/03/2004	DAVID DILL	Not Filed	\$16,425	\$126,651	TN		Yes	1	\$1,125
AF01206	TEAMSTERS LOCAL UNION NO 688 PAC	C00282236	11/05/2004	JOSEPH A GALLI	Not Filed	\$54,231	\$104,419	MO		Yes	0	\$3,000
AF01207	UNITED BROTHERHOOD OF CARPENTERS/JOINERS OF AMER NEW ENGLAND REG	C00150045	11/15/2004	GLENN MARSHALL	Not Filed	\$80,660	\$144,060	CT		Yes	1	\$5,000

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reason To Believe Recommendation - 2004)
(Election-Sensitive) October Quarterly)
Report for the Administrative Fines)
Program:)

BYRON FOR CONGRESS, and RAMONA) AF# 1186
BYRON as treasurer;)

HONEST ABE HIRSCHFELD FOR) AF# 1188

UNITED STATES SENATE, and)
GEORGE L ESPADA as treasurer;)

SAN ANTONIO POLICE OFFICERS) AF# 1189

ASSOCIATION POLITICAL ACTION)
COMMITTEE, and Morgan, Clifford Mr. as)
treasurer;)

AMERICAN PUBLIC POWER) AF# 1190

ASSOCIATION PUBLIC OWNERSHIP)
OF ELECTRIC RESOURCES PAC)
(POWER PAC), and P BIANCA)
DOMALLY as treasurer;)

CITY POLITICAL ACTION) AF# 1191

COMMITTEE (CITY PAC), and)
KENNETH M. SACKOVER as treasurer;)

GILLETTE COMPANY POLITICAL) AF# 1192

ACTION COMMITTEE THE, and Gatlin,)
John Mr. as treasurer;)

IRISH AMERICAN DEMOCRATS, and) AF# 1193

CATHERINE STELLA O'LEARY as)
treasurer;)

SOVEREIGN BANCORP INC PAC, and) AF# 1194

RICHARD E KOSAK as treasurer;)

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VERIZON COMMUNICATION INC) AF# 1195
GOOD GOVT CLUB, and JOAN)
SIMPSON as treasurer;)
WESTERN GROWERS ASSOCIATION) AF# 1196
POLITICAL ACTION COMMITTEE)
FEDERAL, and HARVEY LABKO as)
treasurer;)
SHELBY COUNTY DEMOCRATIC) AF# 1197
EXECUTIVE COMMITTEE, and MYRA)
STILES as treasurer;)
BRANCH COUNTY REPUBLICAN) AF# 1198
COMMITTEE, and RONALD E)
SAMPSEL as treasurer;)
DRAFT CLARK 2004 FOR PRESIDENT) AF# 1199
COMMITTEE, and GEORGE OTEY as)
treasurer;)
CHESAPEAKE FED PAC, and Price, Tom) AF# 1200
as treasurer;)
COLONIAL BANCGROUP INC) AF# 1201
FEDERAL POLITICAL ACTION)
COMMITTEE (COLONIAL FED PAC),)
and GLENDA ALLRED as treasurer;)
CONGRESSIONAL BLACK CAUCUS) AF# 1202
POLITICAL ACTION)
COMMITTEE(CBC-PAC), and Arthur R.)
Collins as treasurer;)
EDO CORPORATION PAC, and) AF# 1203
WILLIAM J FROST as treasurer;)
INDEPENDENT ACTION INC, and) AF# 1204
RALPH SANTORA as treasurer;)
RCG PAC, and DAVID DILL as treasurer;) AF# 1205
TEAMSTERS LOCAL UNION NO 688) AF# 1206
PAC, and JOSEPH A GALLI as treasurer;)
UNITED BROTHERHOOD OF) AF# 1207
CARPENTERS/JOINERS OF AMER NEW)
ENGLAND REG CARPENTERS LEGIS)
EMP CMTE, and GLENN MARSHALL as)
treasurer;)

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CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby certify that on December 06, 2004 the Commission took the following actions on the Reason To Believe Recommendation - 2004 (Election-Sensitive) October Quarterly Report for the Administrative Fines Program as recommended in the Reports Analysis Division's Memorandum dated December 01, 2004, on the following committees:

AF#1186 Decided by a vote of 6-0 to: (1) find reason to believe that BYRON FOR CONGRESS, and RAMONA BYRON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1188 Decided by a vote of 6-0 to: (1) find reason to believe that HONEST ABE HIRSCHFELD FOR UNITED STATES SENATE, and GEORGE L ESPADA as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

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AF#1189 Decided by a vote of 6-0 to: (1) find reason to believe that SAN ANTONIO POLICE OFFICERS ASSOCIATION POLITICAL ACTION COMMITTEE, and Morgan, Clifford Mr. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1190 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN PUBLIC POWER ASSOCIATION PUBLIC OWNERSHIP OF ELECTRIC RESOURCES PAC (POWER PAC), and P BIANCA DOMALLY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1191 Decided by a vote of 6-0 to: (1) find reason to believe that CITY POLITICAL ACTION COMMITTEE (CITY PAC), and KENNETH M. SACKOVER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1192 Decided by a vote of 6-0 to: (1) find reason to believe that GILLETTE COMPANY POLITICAL ACTION COMMITTEE THE, and Gatlin, John Mr. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1193 Decided by a vote of 6-0 to: (1) find reason to believe that IRISH AMERICAN DEMOCRATS, and CATHERINE STELLA O'LEARY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1194 Decided by a vote of 6-0 to: (1) find reason to believe that SOVEREIGN BANCORP INC PAC, and RICHARD E KOSAK as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

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AF#1195 Decided by a vote of 6-0 to: (1) find reason to believe that VERIZON COMMUNICATION INC GOOD GOVT CLUB, and JOAN SIMPSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1196 Decided by a vote of 6-0 to: (1) find reason to believe that WESTERN GROWERS ASSOCIATION POLITICAL ACTION COMMITTEE FEDERAL, and HARVEY LABKO as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1197 Decided by a vote of 6-0 to: (1) find reason to believe that SHELBY COUNTY DEMOCRATIC EXECUTIVE COMMITTEE, and MYRA STILES as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1198 Decided by a vote of 6-0 to: (1) find reason to believe that BRANCH COUNTY REPUBLICAN COMMITTEE, and RONALD E SAMPSEL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1199 Decided by a vote of 6-0 to: (1) find reason to believe that DRAFT CLARK 2004 FOR PRESIDENT COMMITTEE, and GEORGE OTEY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1200 Decided by a vote of 6-0 to: (1) find reason to believe that CHESAPEAKE FED PAC, and Price, Tom as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

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AF#1201 Decided by a vote of 6-0 to: (1) find reason to believe that COLONIAL BANCGROUP INC FEDERAL POLITICAL ACTION COMMITTEE (COLONIAL FED PAC), and GLENDA ALLRED as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1202 Decided by a vote of 6-0 to: (1) find reason to believe that CONGRESSIONAL BLACK CAUCUS POLITICAL ACTION COMMITTEE (CBC-PAC), and Arthur R. Collins as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1203 Decided by a vote of 6-0 to: (1) find reason to believe that EDO CORPORATION PAC, and WILLIAM J FROST as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1204 Decided by a vote of 6-0 to: (1) find reason to believe that INDEPENDENT ACTION INC, and RALPH SANTORA as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1205 Decided by a vote of 6-0 to: (1) find reason to believe that RCG PAC, and DAVID DILL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

AF#1206 Decided by a vote of 6-0 to: (1) find reason to believe that TEAMSTERS LOCAL UNION NO 688 PAC, and JOSEPH A GALLI as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

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AF#1207 Decided by a vote of 6-0 to: (1) find reason to believe that UNITED BROTHERHOOD OF CARPENTERS/JOINERS OF AMER NEW ENGLAND REG CARPENTERS LEGIS EMP CMTE, and GLENN MARSHALL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgrams. Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

Attest:

December 6, 2004
Date

Mary W. Dove
Mary W. Dove
Secretary of the Commission

26092584647

**WESTERN
UNION.**

CONFIRMATION OF CMGM

WESTERN UNION COMMERCIAL SERVICES
TO: CATHERINE STELLA O'LEARY
IRISH AMERICAN DEMOCRATS
PO BOX 15638
CHEVY CHASE MD 20825-5638

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

DECEMBER 7, 2004

CATHERINE STELLA O'LEARY
IRISH AMERICAN DEMOCRATS
PO BOX 15638
CHEVY CHASE MD 20825

C00320432

AF#: 1193

DEAR CATHERINE STELLA O'LEARY:

THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED ("THE ACT"), REQUIRES THAT YOUR COMMITTEE FILE AN OCTOBER QUARTERLY REPORT OF RECEIPTS AND DISBURSEMENTS IN A CALENDAR YEAR DURING WHICH THERE IS A REGULARLY SCHEDULED ELECTION. THIS REPORT, COVERING THE PERIOD THROUGH SEPTEMBER 30TH, SHALL BE FILED NO LATER THAN OCTOBER 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 FILED ON 10/28/2004, 13 DAYS LATE.

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 12/06/2004, THE FEC FOUND THAT THERE IS REASON TO BELIEVE ("RTB") THAT IRISH AMERICAN DEMOCRATS AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) BY FAILING TO FILE TIMELY THIS REPORT ON OR BEFORE OCTOBER 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 \$1425. IT IS DUE BY 01/15/2005 AND IS BASED ON THESE FACTORS:

ELECTION SENSITIVITY OF REPORT: ELECTION SENSITIVE
LEVEL OF ACTIVITY: \$52250
NUMBER OF DAYS LATE: 13
NUMBER OF PREVIOUS CIVIL MONEY PENALTIES ASSESSED: 0

TO PAY THE CALCULATED CIVIL MONEY PENALTY

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

**WESTERN
UNION.****WESTERN UNION COMMERCIAL SERVICES****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 01/15/2005. 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 IRISH
AMERICAN DEMOCRATS 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
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

**WESTERN
UNION.****WESTERN UNION COMMERCIAL SERVICES**

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,

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 \$1425 FOR THE 2004 OCTOBER 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 01/15/2005. 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: IRISH AMERICAN DEMOCRATS

FEC ID#: C00320432

AF#: 1193

PAYMENT DUE DATE: 01/15/2005

PAYMENT AMOUNT DUE: \$1425



To provide support to Democratic candidates who promote peace, justice, and prosperity in Ireland.

January 12th, 2005

REF. C00320432
AF# 1193

2005 JAN 13 P 2:28

FEC OFFICE OF
ADMIN REVIEW

Challenge to RTB Finding and Calculated Money Penalty

1. Irish American Democrats PAC has never filed a late report.
2. For the period in question 7/01/2004 to 9/30/2004 a 39 page report (attached-Item #1)) was filed on paper on October 12th using UPS overnight (receipt attached-Item #2) three days ahead of the due date.
3. On October 22nd, 10 days after the report was filed, Irish American Democrats received a letter from the FEC (Item#3) stating that the report was not acceptable in written form and should be submitted electronically.
4. On the date of receipt of the letter from the FEC Irish American Democrats submitted a letter (attached – Item #4) explaining the reason why an electronic report had not been filed. Four working days later, on October 28th, Irish American Democrats submitted an electronic report.
5. Irish American Democrats submitted a letter to the FEC in 2001(attached-Item #5) explaining that we use Macintosh computers exclusively and requested a waiver from electronic filing since the FEC does not provide software for Macintosh.
6. While the request was for the year 2001, in several conversations with the Reports Division (Scott Walker), I was assured that the software for the Macintosh was being prepared and I could count on it being available when the PAC reached the \$50,000 threshold, which we did not reach until the third quarter of 2004. Each reporting period since I spoke with Scott Walker , I have looked to see if the software was available, but three years later the software for Macintosh is still not available from the FEC.
7. This unreasonable mandate by the FEC that the only application available to file an FEC report electronically is a locally installed and Windows-based application meant that Irish American Democrats were forced to acquire a PC since we work exclusively on Apple's platform, the singular platform we use to do the work of the PAC and the one on which our volunteers could have installed the software if it were available from the FEC.

Irish American Democrats
PO Box 15638
Chevy Chase, MD 20825

Stella O'Leary
President/Treasurer

202-362-9064
fax 202-237-5141
Email: irldems@erols.com
Internet: www.irishamericandemocrats.org

15978526092

- 26092584652
8. Following receipt of the letter from the FEC on October 22nd, Irish American Democrats PAC purchased a PC total cost \$1,089 (receipt attached Item #6) and had to hire a consultant to install the software cost \$1,200 (receipt attached Item #7). This computer serves no purpose other than to file FEC reports.
 9. This \$2,289 cost would have been unnecessary if the software for the Macintosh was available from the FEC.
 10. Irish American Democrats uses a state-of-the-art G5 Macintosh comparable to the best PC available in speed and memory and software capability. This computer is used by millions of Americans, businesses and government agencies. Our operation depends heavily on in-house design for our publications and the MAC provides the versatility that we need for our graphic design. The MAC is a more secure computer than the PC. In other government agencies including the IRS, NIH etc. reports and updates can be electronically submitted on either a MAC or PC platform. There are very few programs that do not sell the software in both a MAC and PC platform.
 11. For the above reasons a) that a paper report was filed on time b) that the Macintosh software is still not available from the FEC and c) that we were compelled to invest in a PC and software consultant, the committee believes that the money penalty is unwarranted and should be waived.

Report of Irregularities in FEC Mailing.

As reported by telephone and email to the FEC Office of Administrative Review(Mary Seiler) and shown to the FEC Reports Division (Katrina Senger) the notice of penalty arrived in a tampered enveloped. The envelope had been carefully opened and resealed with two pieces of scotch tape. (Item#8). This does not meet the standard set out in your determination letter that "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." Ms. Mary Sieler in the FEC Office of Administrative Review believes it is likely that an FEC employee opened the certified letter. Ms. Seiler related that it may be that the original notice from Western Union was accidentally mailed to the FEC and that someone at the FEC opened it and realizing that it was mailed to the wrong address put scotch tape on it and re- certified it and resent it to Irish American Democrats. She reported that nobody in the mailroom remembered seeing it and she hoped to find out who did. Obviously there are many questions remaining about how the irregularity occurred and I await further information from the FEC on the matter.

Sincerely,

Catherine Stella O'Leary

Catherine Stella O'Leary Treasurer

Charles Heller

Notary Public District of Columbia
CHARLES HELLER
My Commission Expires: Sept 30, 2008

SUBSCRIBED AND SWORN
BEFORE ME THIS 12 DAY
OF JANUARY 2005

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS For Other Than An Authorized Committee

Office Use Only

1. NAME OF
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type
over the lines.

12FE4M5

IRISH AMERICAN DEMOCRATS

ADDRESS (number and street)

P.O. BOX 15638



Check if different
than previously
reported. (ACC)

CITREY, CHASE

MD

20825-

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C 00320432

3. IS THIS
REPORT



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)



January 31
Year-End 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

MM / DD / YYYY

MM / DD / YYYY

MM / DD / YYYY

in the
State of

MM / DD / YYYY

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



General (30G)



Runoff (30R)



Special (30S)

Election on

MM / DD / YYYY

MM / DD / YYYY

MM / DD / YYYY

in the
State of

MM / DD / YYYY

5. Covering Period

MM / DD / YYYY

MM / DD / YYYY

MM / DD / YYYY

through

MM / DD / YYYY

MM / DD / YYYY

MM / DD / YYYY

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

CATHERINE STELLA O'LEARY

Signature of Treasurer

Catherine S. O'Leary

Date

MM / DD / YYYY

MM / DD / YYYY

MM / DD / YYYY

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

FEC FORM 3X
(Rev. 02/2003)

SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

IRISH AMERICAN DEMOCRATS

Report Covering the Period:

From:

07 / 01 / 2004

To:

09 / 30 / 2004

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

6. (a) Cash on Hand
January 1, 2004

31,681.65

(b) Cash on Hand at
Beginning of Reporting Period

26,900.80

(c) Total Receipts (from Line 19)

47,534.26

66,029.26

(d) Subtotal (add Lines 6(b) and
6(c) for Column A and Lines
6(a) and 6(c) for Column B)

74,435.06

97,710.91

7. Total Disbursements (from Line 31)

34,244.46

57,520.31

8. Cash on Hand at Close of
Reporting Period
(subtract Line 7 from Line 6(d))

40,190.60

40,190.60

9. Debts and Obligations Owed TO
the Committee (Itemize all on
Schedule C and/or Schedule D)

00.00

10. Debts and Obligations Owed BY
the Committee (Itemize all on
Schedule C and/or Schedule D)

00.00



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

IRISH AMERICAN DEMOCRATS

Report Covering the Period:

From:

07 / 01 / 2004

To:

09 / 30 / 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)

15300.00

(ii) Unitemized

4627.99

(iii) TOTAL (add
Lines 11(a)(i) and (ii)

19927.99

24552.99

(b) Political Party Committees

00.00

00.00

(c) Other Political Committees
(such as PACs)

19200.00

33700.00

(d) Total Contributions (add Lines
11(a)(iii), (b), and (c)) (Carry
Totals to Line 33, page 5)

39127.99

57622.99

12. Transfers From Affiliated/Other Party Committees

00.00

00.00

13. All Loans Received

00.00

00.00

14. Loan Repayments Received

00.00

00.00

15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5)

00.00

00.00

16. Refunds of Contributions Made to Federal Candidates and Other Political Committees

00.00

00.00

17. Other Federal Receipts (Dividends, Interest, etc.)

00.00

00.00

18. Transfers from Non-Federal and Levin Funds

(a) Non-Federal Account
(from Schedule H3)

8406.27

8406.27

(b) Levin Funds (from Schedule H5)

00.00

00.00

(c) Total Transfers (add 18(a) and 18(b))

8406.27

8406.27

19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))

47534.26

66029.26

20. Total Federal Receipts (subtract Line 18(c) from Line 19)

39127.99

57622.99

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) Allocated Federal/Non-Federal
Activity (from Schedule H4)
(i) Federal Share

1260938

1260938

(ii) Non-Federal Share.....

840627

840627

(b) Other Federal Operating
Expenditures

639444

1962329

(c) Total Operating Expenditures
(add 21(a)(i), (a)(ii), and (b))

2741309

4063894

22. Transfers to Affiliated/Other Party
Committees.....

0000

0000

23. Contributions to
Federal Candidates/Committees
and Other Political Committees.....

360000

1125000

24. Independent Expenditures
(use Schedule E)

333137

463137

25. Coordinated Party Expenditures
(2 U.S.C. §441a(d))
(use Schedule F)

0000

0000

26. Loan Repayments Made.....

0000

0000

27. Loans Made.....

0000

0000

28. Refunds of Contributions To:
(a) Individuals/Persons Other
Than Political Committees

0000

0000

(b) Political Party Committees

0000

0000

(c) Other Political Committees
(such as PACs).....

0000

100000

(d) Total Contribution Refunds
(add Lines 28(a), (b), and (c)).....

0000

0000

29. Other Disbursements

0000

0000

30. Federal Election Activity (2 U.S.C. §431(20))

(a) Allocated Federal Election Activity
(from Schedule H6)

0000

0000

(i) Federal Share

(ii) "Levin" Share

0000

0000

(b) Federal Election Activity Paid Entirely
With Federal Funds

0000

0000

(c) Total Federal Election Activity (add ..
Lines 30(a)(i), 30(a)(ii) and 30(b))....

0000

0000

31. Total Disbursements (add Lines 21(c), 22,
23, 24, 25, 26, 27, 28(d), 29 and 30(c))..

3424446

5752031

32. Total Federal Disbursements
(subtract Line 21(a)(ii) and Line 30(a)(ii)
from Line 31).....

2583819

4911404

DETAILED SUMMARY PAGE

of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

III. Net Contributions/Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	39,124.99	57,622.99
34. Total Contribution Refunds (from Line 28(d))	00.00	00.00
35. Net Contributions (other than loans) (subtract Line 33 from Line 32)	39,124.99	57,622.99
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	19,006.82	32,232.67
37. Offsets to Operating Expenditures (from Line 15, page 3)	00.00	00.00
38. Net Operating Expenditures (subtract Line 36 from Line 35)	20,121.17	25,390.32

26092584657

SCHEDULE A (FEC Form)
ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

LINE NUMBER: PAGE **6** OF **39**

(Check only one)

11a	11b	11c	12	
13	14	15	16	17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A. **Association of Trial Lawyers**

Mailing Address

1050 31st St. NW

City

Washington

State

DC

Zip Code

20007

FEC ID number of contributing federal political committee.

C00024521

Name of Employer

Occupation

Receipt For:

☐ Primary

☐ General

☒ Other (specify) **Convention Party**

Aggregate Year-to-Date ▼

1,000.00

Date of Receipt

07 / 29 / 2004

Amount of Each Receipt this Period

1,000.00

Full Name (Last, First, Middle Initial)

B. **Committee on Political Education ARLCIO**

Mailing Address

COPE PCC Acct. 815 16th St. NW

City

Washington

State

DC

Zip Code

20006

FEC ID number of contributing federal political committee.

C00378893

Name of Employer

Occupation

Receipt For:

☐ Primary

☐ General

☒ Other (specify) **Convention Party**

Aggregate Year-to-Date ▼

450.00

Date of Receipt

07 / 29 / 2004

Amount of Each Receipt this Period

450.00

Full Name (Last, First, Middle Initial)

C. **Local 68 Engineers PAC**

Mailing Address

11 Fairchild Pl.

City

West Caldwell

State

N.J.

Zip Code

07006

FEC ID number of contributing federal political committee.

C00138966

Name of Employer

Occupation

Receipt For:

☐ Primary

☐ General

☒ Other (specify) **Convention Party**

Aggregate Year-to-Date ▼

300.00

Date of Receipt

08 / 11 / 2004

Amount of Each Receipt this Period

300.00

SUBTOTAL of Receipts This Page (optional).....▶

1,750.00

TOTAL This Period (last page this line number only).....▶

1,750.00

26092584658

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s)
 for each category of the
 Detailed Summary Page

OR LINE NUMBER:
 Check only one)

PAGE **7** OF **39**

☐ 11a ☐ 11b ☐ 11c ☐ 12
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A. **Daniel Mongiardo for Senate**

Mailing Address

200 Medical Center Drive

City

Hazard

State

KY

Zip Code

41701

FEC ID number of contributing
 federal political committee.

C

Name of Employer

Occupation

Receipt For:

☐ Primary

☐ General

☒ Other (specify) **Convention Party**

Aggregate Year-to-Date ▼

450.00

Date of Receipt

07 / 20 / 2004

Amount of Each Receipt this Period

450.00

B. **American Federation of Teachers**

Mailing Address

555 New Jersey Ave NW

City

Washington

State

DC

Zip Code

20016

FEC ID number of contributing
 federal political committee.

C00157545

Name of Employer

Occupation

Receipt For:

☐ Primary

☐ General

☒ Other (specify) **Convention Party**

Aggregate Year-to-Date ▼

5000.00

Date of Receipt

07 / 20 / 2004

Amount of Each Receipt this Period

5000.00

C. **O'Neill & Associates**

Mailing Address

1 Beacon Street

City

Boston

State

MA

Zip Code

02108

FEC ID number of contributing
 federal political committee.

C00362210

Name of Employer

Occupation

Receipt For:

☐ Primary

☐ General

☒ Other (specify) **Convention Party**

Aggregate Year-to-Date ▼

1000.00

Date of Receipt

07 / 20 / 2004

Amount of Each Receipt this Period

1000.00

SUBTOTAL of Receipts This Page (optional)..... ►

6450.00

TOTAL This Period (last page this line number only)..... ►

6450.00

26092584653

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

LINE NUMBER:
Check only one)

PAGE **8** OF **39**

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17			

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A. **Bricklayers & Allied Craftworkers**

Mailing Address

1776 Eye St. NW

City

Washington

State

DC

Zip Code

20006

FEC ID number of contributing
federal political committee.

C00003632

Name of Employer

Occupation

Receipt For:

☐ Primary ☐ General
☒ Other (specify) **Convention**

PARTY

Aggregate Year-to-Date ▼

5000.00

Date of Receipt

07 / 07 / 2004

Amount of Each Receipt this Period

5000.00

Full Name (Last, First, Middle Initial)

B. **IBEW - COPE**

Mailing Address

1125 15th St. NW

City

Washington

State

DC

Zip Code

20005

FEC ID number of contributing
federal political committee.

C00027342

Name of Employer

Occupation

Receipt For:

☐ Primary ☐ General
☒ Other (specify) **Convention**

PARTY

Aggregate Year-to-Date ▼

5000.00

Date of Receipt

07 / 07 / 2004

Amount of Each Receipt this Period

5000.00

Full Name (Last, First, Middle Initial)

C. **MIRANT CORPORATION**

Mailing Address

1155 Perimeter Center West

City

Atlanta

State

GA

Zip Code

30338

FEC ID number of contributing
federal political committee.

C00365007

Name of Employer

Occupation

Receipt For:

☐ Primary ☐ General
☒ Other (specify) **Convention**

Party

Aggregate Year-to-Date ▼

1000.00

Date of Receipt

07 / 16 / 2004

Amount of Each Receipt this Period

1000.00

SUBTOTAL of Receipts This Page (optional).....▶

TOTAL This Period (last page this line number only).....▶

11000.00

19200.00

SCHEDULE A (FEC Form 3X)

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 9 OF 39

11a 11b 11c 12 13 14 15 16 17

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A. Kevin Smith

Mailing Address

250 Tappan St.

City

Brookline

State

MA

Zip Code

02446

FEC ID number of contributing federal political committee.

C

Date of Receipt

07 08 2004

Amount of Each Receipt this Period

300.00

Name of Employer

Boston Univ.

Occupation

Professor

Receipt For:

☐ Primary ☐ General

☒ Other (specify) Convention Fundraiser Party

Aggregate Year-to-Date

Full Name (Last, First, Middle Initial)

B. Kingsley Atkins

Mailing Address

211 Congress St.

City

Boston

State

MA

Zip Code

02110

FEC ID number of contributing federal political committee.

C

Date of Receipt

07 13 2004

Amount of Each Receipt this Period

300.00

Name of Employer

American Ireland Fund

Occupation

Director

Receipt For:

☐ Primary ☐ General

☒ Other (specify) Convention Fundraiser Party

Aggregate Year-to-Date

300.00

Full Name (Last, First, Middle Initial)

c. Patricia O'Dwyer

Mailing Address

P.O. Box 838

City

Goshen

State

N.Y.

Zip Code

10924

FEC ID number of contributing federal political committee.

C

Date of Receipt

07 16 2004

Amount of Each Receipt this Period

450.00

Name of Employer

Retired

Occupation

Retired

Receipt For:

☐ Primary ☐ General

☒ Other (specify) Convention Fundraiser Party

Aggregate Year-to-Date

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

1050.00

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: (check only one)
☐ 11a ☐ 11b ☐ 11c ☐ 12
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17
 PAGE 10 OF 39

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A. Jeffrey Henderson

Mailing Address

59 Bay State Rd

City

Boston

State

MA

Zip Code

02215

FEC ID number of contributing federal political committee.

C

Date of Receipt

6/16/2004

Amount of Each Receipt this Period

300.00

Name of Employer

Boston University

Occupation

Professor

Receipt For:

☐ Primary ☐ General

☒ Other (specify) Convention Fundraiser Party

Aggregate Year-to-Date

300.00

Full Name (Last, First, Middle Initial)

B. Vincent Lembo

Mailing Address

10 Chatham Rd

City

Norwood

State

MA

Zip Code

02062

FEC ID number of contributing federal political committee.

C

Date of Receipt

6/16/2004

Amount of Each Receipt this Period

300.00

Name of Employer

Northeastern Univ.

Occupation

Governing Board

Receipt For:

☐ Primary ☐ General

☒ Other (specify) Convention Fundraiser Party

Aggregate Year-to-Date

300.00

Full Name (Last, First, Middle Initial)

c. Michael Steed

Mailing Address

4100 Rosemary St.

City

Chevy Chase

State

MD

Zip Code

20815

FEC ID number of contributing federal political committee.

C

Date of Receipt

6/20/2004

Amount of Each Receipt this Period

300.00

Name of Employer

Pacific Capital Group

Occupation

Managing Director

Receipt For:

☐ Primary ☐ General

☒ Other (specify) Convention Fundraiser Party

Aggregate Year-to-Date

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

900.00

SCHEDULE A (FEC Form 3X)

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:

PAGE **11** OF **39**

Check only one

☐ 11a ☐ 11b ☐ 11c ☐ 12
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A. **BRIAN O'DWYER**

Mailing Address

52 Duane St.

City

New York

State

N.Y.

Zip Code

FEC ID number of contributing
federal political committee.

C

Date of Receipt

08 / 11 / 2004

Amount of Each Receipt this Period

300.00

Name of Employer

Occupation

O'Dwyer + Bornstein

lawyer

Receipt For:

☐ Primary

☐ General

☒ Other (specify) **Convention Party**

Aggregate Year-to-Date ▼

300.00

Full Name (Last, First, Middle Initial)

B. **Kathleen O'Leary**

Mailing Address

568 Amsterdam Ave

City

New York

State

N.Y.

Zip Code

10024

FEC ID number of contributing
federal political committee.

C

Date of Receipt

08 / 11 / 2004

Amount of Each Receipt this Period

250.00

Name of Employer

Occupation

White + Case

lawyer

Receipt For:

☐ Primary

☐ General

☒ Other (specify) **Convention Party**

Aggregate Year-to-Date ▼

250.00

Full Name (Last, First, Middle Initial)

c. **Hugh Leo Walsh**

Mailing Address

126 Archwood Ave

City

Annapolis

State

MD

Zip Code

21401

FEC ID number of contributing
federal political committee.

C

Date of Receipt

08 / 11 / 2004

Amount of Each Receipt this Period

450.00

Name of Employer

Occupation

American Life Income

Executive Director

Receipt For:

☐ Primary

☐ General

☒ Other (specify) **Convention Party**

Aggregate Year-to-Date ▼

450.00

SUBTOTAL of Receipts This Page (optional).....

1000.00

TOTAL This Period (last page this line number only).....

26092584663

SCHEDULE A (FEC Form 3X)

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

LINE NUMBER:
(check only one)

PAGE 12 OF 39

☐ 11a ☐ 11b ☐ 11c ☐ 12
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A. John Philip Foley

Mailing Address

179 A Gladstone St.

City

East Boston

State

MA

Zip Code

02128

FEC ID number of contributing
federal political committee.

C

Name of Employer

Self Employed

Occupation

Attorney

Receipt For:

☐ Primary

☐ General

☒ Other (specify)

Convention Fundraising Party

Aggregate Year-to-Date

300.00

Full Name (Last, First, Middle Initial)

B. Patricia McDermott

Mailing Address

126 Merrimac St.

City

Newburyport

State

MA

Zip Code

01950

FEC ID number of contributing
federal political committee.

C

Name of Employer

Dublin City University

Occupation

Director of Development

Receipt For:

☐ Primary

☐ General

☒ Other (specify)

Convention Fundraising Party

Aggregate Year-to-Date

300.00

Full Name (Last, First, Middle Initial)

C. Todd Tatum

Mailing Address

15101 Apple Valley Rd

City

Apple Valley

State

CA

Zip Code

92307

FEC ID number of contributing
federal political committee.

C

Name of Employer

American Housing Group

Occupation

Financial Manager

Receipt For:

☐ Primary

☐ General

☒ Other (specify)

Convention Fundraising Party

Aggregate Year-to-Date

450.00

Date of Receipt

07/26/2004

Amount of Each Receipt this Period

300.00

Date of Receipt

07/26/2004

Amount of Each Receipt this Period

300.00

Date of Receipt

07/26/2004

Amount of Each Receipt this Period

450.00

SUBTOTAL of Receipts This Page (optional)

1050.00

TOTAL This Period (last page this line number only)

SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

LINE NUMBER:

PAGE 13 OF 39

Check only one)

11a 11b 11c 12
13 14 15 16 17

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A. Thomas Foley

Mailing Address

1253 C St SE

City

Wash

State

DC

Zip Code

20003

FEC ID number of contributing federal political committee.

C

Name of Employer

AKins Gump

Occupation

Lawyer

Receipt For:

☐ Primary ☐ General

☒ Other (specify) Convention Party

Aggregate Year-to-Date

300.00

Date of Receipt

07 / 16 / 2004

Amount of Each Receipt this Period

300.00

Full Name (Last, First, Middle Initial)

B. Catherine Greene

Mailing Address

116 Englewood Ave

City

Boston

State

MA

Zip Code

02135

FEC ID number of contributing federal political committee.

C

Name of Employer

Suffolk Co.

Occupation

Lawyer

Receipt For:

☐ Primary ☐ General

☒ Other (specify) Convention Party

Aggregate Year-to-Date

600.00

Date of Receipt

07 / 19 / 2004

Amount of Each Receipt this Period

600.00

Full Name (Last, First, Middle Initial)

C. Fred Rooney

Mailing Address

700 13th St NW

City

Wash

State

DC

Zip Code

20005

FEC ID number of contributing federal political committee.

C

Name of Employer

Cassidy & Associates

Occupation

Consultant

Receipt For:

☐ Primary ☐ General

☒ Other (specify) Convention Party

Aggregate Year-to-Date

300.00

Date of Receipt

07 / 20 / 2004

Amount of Each Receipt this Period

300.00

SUBTOTAL of Receipts This Page (optional)

1200.00

TOTAL This Period (last page this line number only)

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

LINE NUMBER:
(check only one)

PAGE 14 OF 39

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17
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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

A. Full Name (Last, First, Middle Initial)
Paul Kirk

Mailing Address
P.O. Box 1433

City **Marston** State **MA** Zip Code **02648**

FEC ID number of contributing federal political committee.

C

Name of Employer
Self

Occupation
Attorney

Receipt For:

☐ Primary ☐ General

☒ Other (specify) **Convention Party**

Aggregate Year-to-Date ▼

300.00

Date of Receipt

07 / 20 / 2004

Amount of Each Receipt this Period

300.00

B. Full Name (Last, First, Middle Initial)
Gregory Cornbett

Mailing Address
610 N. West St.

City **Alexandria** State **VA** Zip Code **22314**

FEC ID number of contributing federal political committee.

C

Name of Employer
Kirkland + Ellis

Occupation
Attorney

Receipt For:

☐ Primary ☐ General

☒ Other (specify) **Convention Party**

Aggregate Year-to-Date ▼

300.00

Date of Receipt

07 / 20 / 2004

Amount of Each Receipt this Period

300.00

C. Full Name (Last, First, Middle Initial)
Helen Mannich

Mailing Address
4300 Fox Haven Lane

City **Alexandria** State **VA** Zip Code **22304**

FEC ID number of contributing federal political committee.

C

Name of Employer
Self Employed

Occupation
Mannich Strategic

Receipt For:

☐ Primary ☐ General

☒ Other (specify) **Convention Party**

Aggregate Year-to-Date ▼

450.00

Date of Receipt

07 / 20 / 2004

Amount of Each Receipt this Period

450.00

SUBTOTAL of Receipts This Page (optional).....▶

1,050.00

TOTAL This Period (last page, this line number only).....▶

1,050.00

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s)
 for each category of the
 Detailed Summary Page

OR LINE NUMBER:
 Check only one)

PAGE 15 OF 39

11a 11b 11c 12
 13 14 15 16 17

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A. Kate Moss

Mailing Address

1626 Foxhall Rd NW

City

Wash

State

DC

Zip Code

20007

FEC ID number of contributing
 federal political committee.

C

Name of Employer

Kate Moss Co.

Occupation

legislative Consultant

Receipt For:

☐ Primary ☐ General

☒ Other (specify) Convention Party

Aggregate Year-to-Date ▼

1,000.00

Date of Receipt

07 / 20 / 2004

Amount of Each Receipt this Period

1,000.00

B. Pamela Farrell

Mailing Address

2070 Belmont Rd NW

City

Washington

State

DC

Zip Code

20009

FEC ID number of contributing
 federal political committee.

C

Name of Employer

General Electric

Occupation

Govt. Affairs

Receipt For:

☐ Primary ☐ General

☒ Other (specify) Convention Party

Aggregate Year-to-Date ▼

300.00

Date of Receipt

07 / 23 / 2004

Amount of Each Receipt this Period

300.00

C. Lucie Gikouch

Mailing Address

514 Seward Sq SE

City

Washington

State

DC

Zip Code

20003

FEC ID number of contributing
 federal political committee.

C

Name of Employer

Platinum Advisors

Occupation

Vice President

Receipt For:

☐ Primary ☐ General

☒ Other (specify) Convention Party

Aggregate Year-to-Date ▼

800.00

Date of Receipt

07 / 23 / 2004

Amount of Each Receipt this Period

300.00

SUBTOTAL of Receipts This Page (optional) ▶

1,600.00

TOTAL This Period (last page this line number only) ▶

SCHEDULE A (FEC Form 3X)

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

OR LINE NUMBER:
(check only one)

PAGE 16 OF 39

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17
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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

A. Full Name (Last, First, Middle Initial)
Vitaline O-Toole

Mailing Address
32 Grove Ave

City
Madison State
CT Zip Code
06443

FEC ID number of contributing federal political committee.
C

Name of Employer
Retired

Receipt For:
☐ Primary ☐ General
☒ Other (specify) **Conventin Party**

Aggregate Year-to-Date ▼
300.00

Date of Receipt

07 / 23 / 2004

Amount of Each Receipt this Period

300.00

B. Full Name (Last, First, Middle Initial)
Jill Reimer

Mailing Address
2976 Poplar Trl

City
Annapolis State
MD Zip Code
21401

FEC ID number of contributing federal political committee.
C

Name of Employer
N/A

Occupation

Receipt For:
☐ Primary ☐ General
☒ Other (specify) **Conventin Party**

Aggregate Year-to-Date ▼
300.00

Date of Receipt

07 / 23 / 2004

Amount of Each Receipt this Period

300.00

C. Full Name (Last, First, Middle Initial)
Jane Mitakides

Mailing Address
5323 Split Rail

City
Dayton State
OH Zip Code
45429

FEC ID number of contributing federal political committee.
C

Name of Employer
DRMA

Occupation
Recycling

Receipt For:
☐ Primary ☐ General
☒ Other (specify) **Conventin Party**

Aggregate Year-to-Date ▼
300.00

Date of Receipt

07 / 23 / 2004

Amount of Each Receipt this Period

300.00

SUBTOTAL of Receipts This Page (optional)..... ➤

TOTAL This Period (last page this line number only)..... ➤

900.00

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:			PAGE 17 OF 39		
Check only one					
<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17			

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A. **Joan Lewis**

Mailing Address

770 Potomac River Rd

City

McLean

State

VA

Zip Code

22102

FEC ID number of contributing
federal political committee.

C

Name of Employer

Occupation

Retired

Receipt For:

☐ Primary ☐ General

☒ Other (specify) **Convention Party**

Aggregate Year-to-Date ▼

2,500.00

Date of Receipt

07 / 23 / 2004

Amount of Each Receipt this Period

2,500.00

Full Name (Last, First, Middle Initial)

B. **Ben Barnes**

Mailing Address

98 San Jacinto Blvd

City

Austin

State

TX

Zip Code

78701

FEC ID number of contributing
federal political committee.

C

Name of Employer

Occupation

Entrepreneur

Proprietor

Receipt For:

☐ Primary ☐ General

☒ Other (specify) **Convention Party**

Aggregate Year-to-Date ▼

1,000.00

Date of Receipt

07 / 23 / 2004

Amount of Each Receipt this Period

1,000.00

Full Name (Last, First, Middle Initial)

C. **Paul Quinn**

Mailing Address

4051 41st St. North

City

McLean

State

VA

Zip Code

22101

FEC ID number of contributing
federal political committee.

C

Name of Employer

Occupation

Perkins Smith

Attorney

Receipt For:

☐ Primary ☐ General

☒ Other (specify) **Convention Party**

Aggregate Year-to-Date ▼

1,000.00

Date of Receipt

07 / 23 / 2004

Amount of Each Receipt this Period

1,000.00

SUBTOTAL of Receipts This Page (optional).....▶

TOTAL This Period (last page this line number only).....▶

4,500.00

SCHEDULE A (FEC Form 3X)

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

OR LINE NUMBER:

PAGE 18 OF 39

Check only one)

11a 11b 11c 12
13 14 15 16 17

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A. Michael O'Connor

Mailing Address

6 Old Coach Rd

City

Sudbury

State

MA

Zip Code

01776

FEC ID number of contributing federal political committee.

C

Name of Employer

Sudbury Public Schools

Occupation

Teacher

Receipt For:

☐ Primary

☐ General

☒ Other (specify) Convention Party

Aggregate Year-to-Date ▼

450.00

Date of Receipt

07 / 26 / 2004

Amount of Each Receipt this Period

450.00

B. LOTHAR BUDIKA

Mailing Address

506 Georgetown Rd

City

Wallingford

State

PA

Zip Code

19086

FEC ID number of contributing federal political committee.

C

Name of Employer

Self - Employed

Occupation

Mechanical Engineer

Receipt For:

☐ Primary

☐ General

☒ Other (specify) Convention Party

Aggregate Year-to-Date ▼

1000.00

Date of Receipt

07 / 28 / 2004

Amount of Each Receipt this Period

1000.00

C. Full Name (Last, First, Middle Initial)

Mailing Address

City

State

Zip Code

FEC ID number of contributing federal political committee.

C

Name of Employer

Occupation

Receipt For:

☐ Primary

☐ General

☐ Other (specify) ▼

Aggregate Year-to-Date ▼

Date of Receipt

Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional) ▶

TOTAL This Period (last page this line number only) ▶

1450.00

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

LINE NUMBER: PAGE 19 OF 39
(check only one)
☐ 11a ☐ 11b ☐ 11c ☐ 12
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A. Anna Ferrara

Mailing Address

5319 Marden St.

City

Davis

State

CA

Zip Code

95616

FEC ID number of contributing
federal political committee.

C

Name of Employer

N/A

Occupation

Receipt For:

☐ Primary ☐ General

☒ Other (specify) Convention Party

Aggregate Year-to-Date ▼

300.00

Date of Receipt

MM / DD / YYYY
07 / 23 / 2004

Amount of Each Receipt this Period

300.00

Full Name (Last, First, Middle Initial)

B. Jennifer McGee

Mailing Address

1711 Mass Ave NW

City

Wash.

State

DC

Zip Code

20036

FEC ID number of contributing
federal political committee.

C

Name of Employer

Natl. League of Cities

Occupation

Lobbyist

Receipt For:

☐ Primary ☐ General

☒ Other (specify) Convention Party

Aggregate Year-to-Date ▼

300.00

Date of Receipt

MM / DD / YYYY
07 / 23 / 2004

Amount of Each Receipt this Period

300.00

Full Name (Last, First, Middle Initial)

C.

Mailing Address

City

State

Zip Code

FEC ID number of contributing
federal political committee.

C

Name of Employer

Occupation

Receipt For:

☐ Primary ☐ General

☐ Other (specify) ▼

Aggregate Year-to-Date ▼

Date of Receipt

MM / DD / YYYY

Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional).....▶

TOTAL This Period (last page this line number only).....▶

600.00

15300.00

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 20 OF 39

☐ 21b ☐ 22 ☐ 23 ☐ 24 ☐ 25 ☐ 26
☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29 ☐ 30b

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

Date of Disbursement

09 / 22 / 2004

A.

Neal for Congress

Mailing Address

1550 Main St.

City

Springfield MA 01103

Purpose of Disbursement

Contribution

Candidate Name

Richard Neal

011
Category/
Type

Amount of Each Disbursement this Period

500.00

Office Sought:

☒ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) ▼

State: MA

District:

Full Name (Last, First, Middle Initial)

Date of Disbursement

09 / 14 / 2004

B.

Vermont Victory 2004

Mailing Address

503 Capitol Court

City

Washington DC 20002

Purpose of Disbursement

Contribution

Candidate Name

PAC

011
Category/
Type

Amount of Each Disbursement this Period

1,000.00

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☒ Other (specify) ▼

State:

District:

Vermont Democratic Party

Full Name (Last, First, Middle Initial)

Date of Disbursement

09 / 07 / 2004

C.

Jim Sullivan for Congress

Mailing Address

P.O. Box 784

City

Norwich CT 06360

Purpose of Disbursement

Contribution

Candidate Name

Jim Sullivan

011
Category/
Type

Amount of Each Disbursement this Period

500.00

Office Sought:

☒ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☒ General
☐ Other (specify) ▼

State: CT

District:

SUBTOTAL of Disbursements This Page (optional).....▶

TOTAL This Period (last page this line number only).....▶

2000.00

26092584672

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 21 OF 39

☐ 21b ☐ 22 ☐ 23 ☐ 24 ☐ 25 ☐ 26
☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29 ☐ 30b

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A.

Joe Driscoll for Congress

Mailing Address

P O Box 5341

City

Bethlehem

State

PA

Zip Code

18015

Purpose of Disbursement

Contribution

Candidate Name

Joe Driscoll

0.1.1

Category/
Type

Office Sought:

☐ House

☐ Senate

☐ President

Disbursement For:

☐ Primary

☒ General

☐ Other (specify) ▼

State:

PA

District:

15th

Date of Disbursement

MM/DD/YYYY
07/12/2004

Amount of Each Disbursement this Period

250.00

B.

Hill pac

Mailing Address

1717 K Street NW

City

Washington

State

DC

Zip Code

20036

Purpose of Disbursement

Contribution

Candidate Name

Hillary Clinton

0.1.1

Category/
Type

Office Sought:

☐ House

☒ Senate

☐ President

Disbursement For:

☐ Primary

☐ General

☐ Other (specify) ▼

State:

NY

District:

Date of Disbursement

MM/DD/YYYY
07/20/2004

Amount of Each Disbursement this Period

1000.00

C.

CLOONEY FOR CONGRESS

Mailing Address

P O Box 176102

City

Covington

State

KY

Zip Code

41017

Purpose of Disbursement

Contribution

Candidate Name

Nick Clooney

0.1.1

Category/
Type

Office Sought:

☒ House

☐ Senate

☐ President

Disbursement For:

☐ Primary

☒ General

☐ Other (specify) ▼

State:

KY

District:

4th

Date of Disbursement

MM/DD/YYYY
09/19/2004

Amount of Each Disbursement this Period

250.00

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

1500.00

3500.00

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 22 OF 39

☐ 21b ☐ 22 ☐ 23 ☐ 24 ☐ 25 ☐ 26
☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29 ☐ 30b

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A.

Bruce Variety

Mailing Address

Arlington Rd.

City

Bethesda

State

MD

Zip Code

20825

Purpose of Disbursement

Supplies for Campaign Meeting

Candidate Name

0.01

Category/
Type

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☒ Other (specify) Administrative

State:

District:

Date of Disbursement

07/01/2004

Amount of Each Disbursement this Period

129.48

B.

Gorman & Associates

Mailing Address

1666 K St. NW

City

Wash.

State

DC

Zip Code

20006

Purpose of Disbursement

PAC Consultation Fee

Candidate Name

0.01

Category/
Type

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☒ Other (specify) Administrative

State:

District:

Date of Disbursement

07/02/2004

Amount of Each Disbursement this Period

1020.00

C.

Starpower

Mailing Address

7927 Woodcroft Court

City

Springfield

State

VA

Zip Code

Purpose of Disbursement

Phone

Candidate Name

0.01

Category/
Type

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☒ Other (specify) Administrative

State:

District:

Date of Disbursement

07/14/2004

Amount of Each Disbursement this Period

60.00

SUBTOTAL of Disbursements This Page (optional) ▶

TOTAL This Period (last page this line number only) ▶

1209.48

26092584674

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 23 OF 39

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A.

Staples

Mailing Address

Bradley - Wisconsin Ave

City

Bethesda

State

MD

Zip Code

20825

Purpose of Disbursement

Office Supplies

Candidate Name

0.01
Category/
Type

Date of Disbursement

07 / 08 / 2004

Amount of Each Disbursement this Period

18.86

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☒ Other (specify) Administration

State:

District:

Full Name (Last, First, Middle Initial)

B.

United States Postal Service

Mailing Address

5701 Connecticut Ave

City

Chevy Chase

State

MD

Zip Code

20825

Purpose of Disbursement

Postage

Candidate Name

0.01
Category/
Type

Date of Disbursement

07 / 23 / 2004

Amount of Each Disbursement this Period

110.31

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☒ Other (specify) Administration

State:

District:

Full Name (Last, First, Middle Initial)

C.

Sheraton Hotel

Mailing Address

City

Boston

State

MA

Zip Code

Purpose of Disbursement

Committee Lunch Meeting

Candidate Name

0.01
Category/
Type

Date of Disbursement

07 / 30 / 2004

Amount of Each Disbursement this Period

57.01

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☒ Other (specify) Administration

State:

District:

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

186.18

186.18

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 24 OF 39

☐ 21b ☐ 22 ☐ 23 ☐ 24 ☐ 25 ☐ 26
☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29 ☐ 30b

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A. Date of Disbursement

Mailing Address

Sprink
PO Box 8077

City

London

State

KY

Zip Code

40742

Purpose of Disbursement

Candidate Name

0.01
Category/
Type

Amount of Each Disbursement this Period

75.09

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☒ Other (specify)

State:

District:

Administration

Full Name (Last, First, Middle Initial)

B. Date of Disbursement

Mailing Address

Starpower
7927 Woodruff Court
Springfield VA

City

State

Zip Code

Purpose of Disbursement

Candidate Name

0.01
Category/
Type

Amount of Each Disbursement this Period

336.68

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☒ Other (specify)

State:

District:

Administration

Full Name (Last, First, Middle Initial)

C. Date of Disbursement

Mailing Address

Gorman + Associates
1666 K St. NW

City

State

Zip Code

Purpose of Disbursement

Candidate Name

0.01
Category/
Type

Amount of Each Disbursement this Period

1,000.00

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☒ Other (specify)

State:

District:

Administration

SUBTOTAL of Disbursements This Page (optional).....

TOTAL This Period (last page this line number only).....

1,411.77

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 25 OF 39

☐ 21b ☐ 22 ☐ 23 ☐ 24 ☐ 25 ☐ 26
☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29 ☐ 30b

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A. **WACHOVIA BANK**

Mailing Address **Connecticut Ave NW**

City **Washington** State **DC** Zip Code **20015**

Purpose of Disbursement **Bank Service Charge**

Candidate Name **[Blank]** Category/Type **001**

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: ☐ Primary ☐ General ☒ Other (specify) **Administration**

State: **[Blank]** District: **[Blank]**

Date of Disbursement **08 / 10 / 2004**

Amount of Each Disbursement this Period **6.00**

B. **Office Chair**

Mailing Address **Clifden Main St.**

City **Clifden** State **Co. Galway** Zip Code **Ireland**

Purpose of Disbursement **Phone to Committee**

Candidate Name **[Blank]** Category/Type **001**

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: ☐ Primary ☐ General ☒ Other (specify) **Administration**

State: **[Blank]** District: **[Blank]**

Date of Disbursement **08 / 09 / 2004**

Amount of Each Disbursement this Period **24.82**

C. **Staples**

Mailing Address **Bradley Wisconsin Ave**

City **Bethesda** State **Md.** Zip Code **20825**

Purpose of Disbursement **Printing Cartridges**

Candidate Name **[Blank]** Category/Type **001**

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: ☐ Primary ☐ General ☒ Other (specify) **Administration**

State: **[Blank]** District: **[Blank]**

Date of Disbursement **08 / 02 / 2004**

Amount of Each Disbursement this Period **67.12**

SUBTOTAL of Disbursements This Page (optional).....▶

TOTAL This Period (last page this line number only).....▶

97.94

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 26 OF 39

☐ 21b ☐ 22 ☐ 23 ☐ 24 ☐ 25 ☐ 26
☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29 ☐ 30b

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A. Staples Date of Disbursement

Mailing Address

Bradley + Wisconsin Ave

City

Chevy Chase

State

MD

Zip Code

20825

Purpose of Disbursement

FAX MACHINE

Candidate Name

001

Category/
Type

Amount of Each Disbursement this Period

17212

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☒ Other (specify)

Administration

State:

District:

Full Name (Last, First, Middle Initial)

B. Bruce Variety Date of Disbursement

Mailing Address

Arlington Rd

City

Bethesda

State

MD

Zip Code

Purpose of Disbursement

Candidate Name

001

Category/
Type

Amount of Each Disbursement this Period

3744

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☒ Other (specify)

Administration

State:

District:

Full Name (Last, First, Middle Initial)

C. Motophoto Date of Disbursement

Mailing Address

Connecticut Ave NW

City

Washington

State

DC

Zip Code

20015

Purpose of Disbursement

Photos for Internet

Candidate Name

001

Category/
Type

Amount of Each Disbursement this Period

2178

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☒ Other (specify)

Administration

State:

District:

SUBTOTAL of Disbursements This Page (optional)

23134

TOTAL This Period (last page this line number only)

26092584678

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 27 OF 39

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A. USPS

Mailing Address

Connecticut Ave

City

Chevy Chase

State

MD

Zip Code

20825

Purpose of Disbursement

Postage / Mailing

Candidate Name

001
Category/
Type

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☒ Other (specify)

Administration

State:

District:

Date of Disbursement

09 / 21 / 2004

Amount of Each Disbursement this Period

226.99

B. Staples

Mailing Address

Bradley Wisc. Ave

City

Bethesda

State

MD

Zip Code

20825

Purpose of Disbursement

Office Supplies

Candidate Name

001
Category/
Type

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify)

Administration

State:

District:

Date of Disbursement

09 / 13 / 2004

Amount of Each Disbursement this Period

139.02

C. Red Sage Restaurant

Mailing Address

City

State

Zip Code

Purpose of Disbursement

Luncheon / Committee

Candidate Name

Organization Luncheon

001
Category/
Type

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☒ Other (specify)

Administration

State:

District:

Date of Disbursement

09 / 28 / 2004

Amount of Each Disbursement this Period

86.22

SUBTOTAL of Disbursements This Page (optional).....

TOTAL This Period (last page this line number only).....

452.23

26092584679

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 28 OF 39

☐ 21b ☐ 22 ☐ 23 ☐ 24 ☐ 25 ☐ 26
☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29 ☐ 30b

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

A.

Slarpower

Date of Disbursement

MEM 07 DDD 14 YYYYYY 2004

Mailing Address

7927 Woodcruft Court

City

Springfield

State

VA

Zip Code

Purpose of Disbursement

Internet

0.01

Category/
Type

Amount of Each Disbursement this Period

13834

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) Administration

State:

District:

Full Name (Last, First, Middle Initial)

B.

Sprink

Date of Disbursement

MEM 07 DDD 14 YYYYYY 2004

Mailing Address

P.O. Box 8077

City

London

State

KY

Zip Code

40742

Purpose of Disbursement

Phone

0.01

Category/
Type

Amount of Each Disbursement this Period

6103

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☒ General
☐ Other (specify) Administration

State:

District:

Full Name (Last, First, Middle Initial)

C.

Gorman & Associates

Date of Disbursement

MEM 07 DDD 23 YYYYYY 2004

Mailing Address

1666 K St. NW

City

Wash.

State

DC

Zip Code

20006

Purpose of Disbursement

PAC Consultation Fee

0.01

Category/
Type

Amount of Each Disbursement this Period

239000

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☒ Other (specify) Administration

State:

District:

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

258937

26092584680

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 29 OF 39

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

Full Name (Last, First, Middle Initial)

Date of Disbursement

08 / 04 / 2004

A. Office Char

Mailing Address Main St

City Clifden State Co. Galway Zip Code Ireland

Purpose of Disbursement

Phone to Committee

Candidate Name

001

Category/
Type

Amount of Each Disbursement this Period

181.69

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☒ Other (specify)

State:

District:

Administration

Full Name (Last, First, Middle Initial)

Date of Disbursement

07 / 01 / 2004

B. Bruce Variety

Mailing Address Arlington Rd

City Bethesda State Md. Zip Code 20825

Purpose of Disbursement

Supplies for long Island Meeting

Candidate Name

001

Category/
Type

Amount of Each Disbursement this Period

37.44

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify)

State:

District:

Administration

Full Name (Last, First, Middle Initial)

Date of Disbursement

/ /

C. Mailing Address

City State Zip Code

Purpose of Disbursement

Candidate Name

Category/
Type

Amount of Each Disbursement this Period

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify)

State:

District:

SUBTOTAL of Disbursements This Page (optional).....

TOTAL This Period (last page this line number only).....

219.13

639.44

**SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES**

PAGE 30 OF 39
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) IRISH AMERICAN DEMOCRATS	FEC IDENTIFICATION NUMBER ▼ C 00320432
Check if <input type="checkbox"/> 24-hour notice <input type="checkbox"/> 48-hour notice	

Full Name (Last, First, Middle Initial) of Payee RUN AND WIN		Date 09 / 16 / 2004
Mailing Address P.O. Box 177		Amount 321.25
City Studley	State VA	Zip Code 23162
Purpose of Expenditure Bumper Stickers	Category/Type 004	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input checked="" type="checkbox"/> President District: _____
Name of Federal Candidate Supported or Opposed by Expenditure: John Kerry		Check One: <input type="checkbox"/> Support <input type="checkbox"/> Oppose
Calendar Year-To-Date Per Election for Office Sought 161.25		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) _____

Full Name (Last, First, Middle Initial) of Payee Hunt Valley Coaches		Date 09 / 02 / 2004
Mailing Address 227 Cockeysville		Amount 1300.00
City Cockeysville	State MD	Zip Code 21030
Purpose of Expenditure Bus Rental for Rally	Category/Type 004	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input checked="" type="checkbox"/> President District: _____
Name of Federal Candidate Supported or Opposed by Expenditure: John Kerry		Check One: <input type="checkbox"/> Support <input type="checkbox"/> Oppose
Calendar Year-To-Date Per Election for Office Sought 2921.25		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) _____

(a) SUBTOTAL of Itemized Independent Expenditures	1621.25
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Catherine Stella Cheney
Signature

Date **10 / 12 / 2004**

26092584682

**SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES**

PAGE 31 OF 39
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) IRISH AMERICAN DEMOCRATS	FEC IDENTIFICATION NUMBER ▼ C00320432
Check if <input type="checkbox"/> 24-hour notice <input type="checkbox"/> 48-hour notice	

Full Name (Last, First, Middle Initial) of Payee Customink		Date 09 / 13 / 2004
Mailing Address 7799 Leesburg Pike		Amount 531.50
City Falls Church	State VA Zip Code 22043	
Purpose of Expenditure Tee Shirts	Category/Type 004	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input checked="" type="checkbox"/> President State: _____ District: _____
Name of Federal Candidate Supported or Opposed by Expenditure: John Kerry		Check One: <input type="checkbox"/> Support <input type="checkbox"/> Oppose
Calendar Year-To-Date Per Election for Office Sought 345275		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) _____

Full Name (Last, First, Middle Initial) of Payee A Advertising		Date 09 / 17 / 2004
Mailing Address		Amount 241.80
City Omaha	State Zip Code	
Purpose of Expenditure Buttons/Campaign	Category/Type 004	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: _____ District: _____
Name of Federal Candidate Supported or Opposed by Expenditure: John Kerry		Check One: <input type="checkbox"/> Support <input type="checkbox"/> Oppose
Calendar Year-To-Date Per Election for Office Sought 369455		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) _____

(a) SUBTOTAL of Itemized Independent Expenditures	773.30
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Catherine Stella Cheung
Signature

Date **10 / 09 / 2004**

26092504683

**SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES**

PAGE 32 OF 39
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) IRISH AMERICAN DEMOCRATS	FEC IDENTIFICATION NUMBER ▼ C00320432
Check if <input type="checkbox"/> 24-hour notice <input type="checkbox"/> 48-hour notice	

Full Name (Last, First, Middle Initial) of Payee A Advertising		Date 07 / 12 / 2004
Mailing Address 7630 Cass Street		Amount 404.00
City Omaha	State NE Zip Code 68114	
Purpose of Expenditure Bumper Stickers	Category/Type 004	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input checked="" type="checkbox"/> President State: _____ District: _____
Name of Federal Candidate Supported or Opposed by Expenditure: John Kerry		Check One: <input type="checkbox"/> Support <input type="checkbox"/> Oppose
Calendar Year-To-Date Per Election for Office Sought 4098.55		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) _____

Full Name (Last, First, Middle Initial) of Payee A Advertising		Date 07 / 14 / 2004
Mailing Address 7630 Cass Street		Amount 410.00
City Omaha	State NE Zip Code 68114	
Purpose of Expenditure Bumper Stickers	Category/Type 004	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input checked="" type="checkbox"/> President State: _____ District: _____
Name of Federal Candidate Supported or Opposed by Expenditure: John Kerry		Check One: <input type="checkbox"/> Support <input type="checkbox"/> Oppose
Calendar Year-To-Date Per Election for Office Sought 4508.55		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) _____

(a) SUBTOTAL of Itemized Independent Expenditures	814.00
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Catherine Stella Cheung
Signature

Date **10 / 10 / 2004**

26092584684

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

PAGE 33 OF 39
 FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) IRISH AMERICAN DEMOCRATS	FEC IDENTIFICATION NUMBER ▼ C00320432
Check if <input type="checkbox"/> 24-hour notice <input type="checkbox"/> 48-hour notice	

Full Name (Last, First, Middle Initial) of Payee Staples		Date 09 / 22 / 2004
Mailing Address Bradley + Wisconsin Ave		Amount 1,228.2
City Bethesda	State Md. Zip Code 20825	
Purpose of Expenditure Campaign Flyers	Category/Type 004	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input checked="" type="checkbox"/> President State: _____ District: _____
Name of Federal Candidate Supported or Opposed by Expenditure: John Kerry		Check One: <input type="checkbox"/> Support <input type="checkbox"/> Oppose
Calendar Year-To-Date Per Election for Office Sought 4,631.37		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____

Full Name (Last, First, Middle Initial) of Payee		Date
Mailing Address		Amount
City	State Zip Code	
Purpose of Expenditure	Category/Type	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: _____ District: _____
Name of Federal Candidate Supported or Opposed by Expenditure:		Check One: <input type="checkbox"/> Support <input type="checkbox"/> Oppose
Calendar Year-To-Date Per Election for Office Sought		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____

(a) SUBTOTAL of Itemized Independent Expenditures	3,331.37
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	3,331.37

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Catherine Stella Cheung
 Signature

Date **10 / 10 / 2004**

26092584635

SCHEDULE H2 (FEC Form 3X)
ALLOCATION RATIOS

PAGE 34 OF 39

NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

**RATIOS FOR ALLOCABLE FUNDRAISING EVENTS AND DIRECT CANDIDATE SUPPORT
 ACTIVITIES APPEARING ON THIS REPORT.**

Methods of allocation:

- I. **FUNDRAISING** activities are allocated using the "funds received method" where the federal proportion of expenses must equal the federal proportion of monies raised.
- II. Shared **DIRECT CANDIDATE SUPPORT** activities are allocated according to benefit expected to be derived, where the federal proportion of disbursements is based on the benefit derived by federal candidates from the activity.

ACTIVITY OR EVENT IDENTIFIER

CONVENTION PARTY BOSTON

ACTIVITY IS:

☒ Fundraising ☐ Direct Candidate Support

CHECK IF THE RATIO IS:

☐ New ☐ Revised ☐ Same as Previously Reported

FEDERAL %

60.00 %

NON-FEDERAL %

40.00 %

ACTIVITY OR EVENT IDENTIFIER

ACTIVITY IS:

☐ Fundraising ☐ Direct Candidate Support

CHECK IF THE RATIO IS:

☐ New ☐ Revised ☐ Same as Previously Reported

FEDERAL %

NON-FEDERAL %

ACTIVITY OR EVENT IDENTIFIER

ACTIVITY IS:

☐ Fundraising ☐ Direct Candidate Support

CHECK IF THE RATIO IS:

☐ New ☐ Revised ☐ Same as Previously Reported

FEDERAL %

NON-FEDERAL %

ACTIVITY OR EVENT IDENTIFIER

ACTIVITY IS:

☐ Fundraising ☐ Direct Candidate Support

CHECK IF THE RATIO IS:

☐ New ☐ Revised ☐ Same as Previously Reported

FEDERAL %

NON-FEDERAL %

ACTIVITY OR EVENT IDENTIFIER

ACTIVITY IS:

☐ Fundraising ☐ Direct Candidate Support

CHECK IF THE RATIO IS:

☐ New ☐ Revised ☐ Same as Previously Reported

FEDERAL %

NON-FEDERAL %

ACTIVITY OR EVENT IDENTIFIER

ACTIVITY IS:

☐ Fundraising ☐ Direct Candidate Support

CHECK IF THE RATIO IS:

☐ New ☐ Revised ☐ Same as Previously Reported

FEDERAL %

NON-FEDERAL %

26092504686

SCHEDULE H3 (FEC Form 3X)
TRANSFERS FROM NON-FEDERAL ACCOUNTS FOR
ALLOCATED FEDERAL / NON-FEDERAL ACTIVITY

PAGE 35 OF 39
 FOR LINE 18a OF FORM 3X

NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

NAME OF ACCOUNT

**IRISH AMERICAN
 DEMOCRATS
 NON-FEDERAL**

DATE OF RECEIPT

09 / 29 / 2004

TOTAL AMOUNT TRANSFERRED

8022.98

BREAKDOWN OF TRANSFER RECEIVED

i) Total Administrative

ii) Generic Voter Drive

iii) Exempt Activities

iv) Direct Fundraising (List Activity or Event Identifier)

a) **Boston Convention Party**

b)

c) Total Amount Transferred For Direct Fundraising

8022.98

v) Direct Candidate Support (List Activity or Event Identifier)

a)

b)

c) Total Amount Transferred For Direct Candidate Support

TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED

TOTAL This Period (Administrative)

TOTAL This Period (Generic Voter Drive)

TOTAL This Period (Exempt Activities)

TOTAL This Period (Direct Fundraising)

TOTAL This Period (Direct Candidate Support)

TOTAL This Period (Total Amount Transferred)

26092584687

SCHEDULE H3 (FEC Form 3X)
TRANSFERS FROM NON-FEDERAL ACCOUNTS FOR
ALLOCATED FEDERAL / NON-FEDERAL ACTIVITY

PAGE 36 OF 39
 FOR LINE 18a OF FORM 3X

NAME OF COMMITTEE (In Full)
IRISH AMERICAN DEMOCRATS

NAME OF ACCOUNT IRISH AMERICAN DEMOCRATS NON-FEDERAL	DATE OF RECEIPT 09 / 14 / 2004	TOTAL AMOUNT TRANSFERRED 383.29
---	--	---

BREAKDOWN OF TRANSFER RECEIVED

i) Total Administrative

ii) Generic Voter Drive

iii) Exempt Activities

iv) Direct Fundraising (List Activity or Event Identifier)

a) **Boston Convention Party**

b)

c) Total Amount Transferred For Direct Fundraising **383.29**

v) Direct Candidate Support (List Activity or Event Identifier)

a)

b)

c) Total Amount Transferred For Direct Candidate Support.....

TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED

TOTAL This Period (Administrative)

TOTAL This Period (Generic Voter Drive)

TOTAL This Period (Exempt Activities)

TOTAL This Period (Direct Fundraising)

TOTAL This Period (Direct Candidate Support)

TOTAL This Period (Total Amount Transferred).....

26092584688

SCHEDULE H4 (FEC Form
DISBURSEMENTS OF ALLOCATED
FEDERAL/NON-FEDERAL ACTIVITY

PAGE 37 OF 39
 FOR LINE 21a OF FORM 3X

NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

A. Full Name (Last, First, Middle Initial)

Boston Park Plaza

Mailing Address

64 Arlington St

City

Boston MA 02116

Purpose of Disbursement

Convention Party

Activity or Event Identifier:

Reception

003

Category/
Type

Allocated Activity or Event:

☐ Administrative ☒ Fundraising ☐ Exempt
☐ Voter Drive ☐ Direct Candidate Support

Allocated Activity or Event Year-To-Date

133,110.1

Date

07/27/2004

FEDERAL SHARE

+

NON-FEDERAL SHARE

=

TOTAL AMOUNT

76,336.6

50,891.2

127,227.8

B. Full Name (Last, First, Middle Initial)

Prodigals Band

Mailing Address

City

State

Zip Code

Purpose of Disbursement:

Music / Band

Activity or Event Identifier:

Convention Party

003

Category/
Type

Allocated Activity or Event:

☐ Administrative ☒ Fundraising ☐ Exempt
☐ Voter Drive ☐ Direct Candidate Support

Allocated Activity or Event Year-To-Date

16,811.01

Date

07/27/2004

FEDERAL SHARE

+

NON-FEDERAL SHARE

=

TOTAL AMOUNT

21,000.00

14,000.00

35,000.00

C. Full Name (Last, First, Middle Initial)

USPS

Mailing Address

Connecticut Ave

City

State

Zip Code

Cherry Chase Md. 20825

Purpose of Disbursement:

Postage

Activity or Event Identifier:

Convention Party

003

Category/
Type

Allocated Activity or Event:

☐ Administrative ☒ Fundraising ☐ Exempt
☐ Voter Drive ☐ Direct Candidate Support

Allocated Activity or Event Year-To-Date

17,181.01

Date

07/06/2004

FEDERAL SHARE

+

NON-FEDERAL SHARE

=

TOTAL AMOUNT

22,200

14,800

37,000

SUBTOTAL of Allocated Federal and Non-Federal Activity This Page

FEDERAL SHARE

+

NON-FEDERAL SHARE

=

TOTAL AMOUNT

99,556.6

66,371.2

165,927.8

TOTAL This Period (last page for each line only)(Federal share to 21(a)(i) and Non-Federal share to 21(a)(ii))

FEDERAL SHARE

TOTAL AMOUNT

NON-FEDERAL SHARE

TOTAL This Period for the Non-Federal Share

26092534689

SCHEDULE H4 (FEC Form

**DISBURSEMENTS OF ALLOCATED
FEDERAL/NON-FEDERAL ACTIVITY**

PAGE 38 OF 39
FOR LINE 21a OF FORM 3X

NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

A. Full Name (Last, First, Middle Initial)

David AndruKilis

Mailing Address

50 E. SV. SE

City

Washington

State

DC

Zip Code

20001

Purpose of Disbursement

Invitations

Activity or Event Identifier:

Convention Party

0.03

Category/
Type

Allocated Activity or Event:

☐ Administrative ☒ Fundraising ☐ Exempt
☐ Voter Drive ☐ Direct Candidate Support

Allocated Activity or Event Year-To-Date

359.02

Date

07 02 2004

FEDERAL SHARE

+

NON-FEDERAL SHARE

=

TOTAL AMOUNT

215.41

143.61

359.02

B. Full Name (Last, First, Middle Initial)

David AndruKilis

Mailing Address

50 E SV SE

City

Washington

State

DC

Zip Code

20001

Purpose of Disbursement:

Event Tickets

Activity or Event Identifier:

Convention Party

0.03

Category/
Type

Allocated Activity or Event:

☐ Administrative ☒ Fundraising ☐ Exempt
☐ Voter Drive ☐ Direct Candidate Support

Allocated Activity or Event Year-To-Date

504.43

Date

07 12 2004

FEDERAL SHARE

+

NON-FEDERAL SHARE

=

TOTAL AMOUNT

87.25

58.16

145.41

C. Full Name (Last, First, Middle Initial)

Brenlanos

Mailing Address

Arlington Rd

City

Bethesda

State

MD

Zip Code

20825

Purpose of Disbursement:

Tapes

Activity or Event Identifier:

Convention Party

0.03

Category/
Type

Allocated Activity or Event:

☐ Administrative ☒ Fundraising ☐ Exempt
☐ Voter Drive ☐ Direct Candidate Support

Allocated Activity or Event Year-To-Date

588.22

Date

07 13 2004

FEDERAL SHARE

+

NON-FEDERAL SHARE

=

TOTAL AMOUNT

50.27

33.52

83.79

SUBTOTAL of Allocated Federal and Non-Federal Activity This Page

FEDERAL SHARE

+

NON-FEDERAL SHARE

=

TOTAL AMOUNT

352.93

235.29

588.22

TOTAL This Period (last page for each line only)(Federal share to 21(a)(i) and Non-Federal share to 21(a)(ii))

FEDERAL SHARE

TOTAL AMOUNT

TOTAL This Period for the Non-Federal Share

NON-FEDERAL SHARE

26092584690

SCHEDULE H4 (FEC Form)
DISBURSEMENTS OF ALLOCATED
FEDERAL/NON-FEDERAL ACTIVITY

PAGE 39 OF 39
FOR LINE 21a OF FORM 3X

NAME OF COMMITTEE (In Full)

IRISH AMERICAN DEMOCRATS

A. Full Name (Last, First, Middle Initial)

Doubletree Hotels

Mailing Address

400 Soldiers Field Road

City

Boston

State

MA

Zip Code

02134

Purpose of Disbursement:

Accommodation for Board Members

0.03

Activity or Event Identifier:

Convention Party

Category/
Type

Allocated Activity or Event:

☐ Administrative ☒ Fundraising ☐ Exempt

☐ Voter Drive ☐ Direct Candidate Support

Allocated Activity or Event Year-To-Date

20,835.66

Date

07 / 27 / 2004

FEDERAL SHARE

+

NON-FEDERAL SHARE

=

TOTAL AMOUNT

2,192.79

1,461.86

3,654.65

B. Full Name (Last, First, Middle Initial)

Boston Park Plaza

Mailing Address

64 Arlington St

City

Boston

State

MA

Zip Code

02116

Purpose of Disbursement:

Supplemental Charge - Event

0.03

Activity or Event Identifier:

Convention Party

Category/
Type

Allocated Activity or Event:

☐ Administrative ☒ Fundraising ☐ Exempt

☐ Voter Drive ☐ Direct Candidate Support

Allocated Activity or Event Year-To-Date

21,015.66

Date

07 / 20 / 2004

FEDERAL SHARE

+

NON-FEDERAL SHARE

=

TOTAL AMOUNT

1,080.00

7,200

18,000

C. Full Name (Last, First, Middle Initial)

Mailing Address

City

State

Zip Code

Purpose of Disbursement:

Activity or Event Identifier:

Category/
Type

Allocated Activity or Event:

☐ Administrative ☐ Fundraising ☐ Exempt

☐ Voter Drive ☐ Direct Candidate Support

Allocated Activity or Event Year-To-Date

Date

/ /

FEDERAL SHARE

+

NON-FEDERAL SHARE

=

TOTAL AMOUNT

SUBTOTAL of Allocated Federal and Non-Federal Activity This Page

FEDERAL SHARE

+

NON-FEDERAL SHARE

=

TOTAL AMOUNT

2,300.79

1,533.86

3,834.65

TOTAL This Period (last page for each line only)(Federal share to 21(a)(i) and Non-Federal share to 21(a)(ii))

FEDERAL SHARE

1,260.938

NON-FEDERAL SHARE

8,406.27

TOTAL AMOUNT

21,015.65

TOTAL This Period for the Non-Federal Share

26092584691

Shipment Receipt: Page #1 of 1

THIS IS A SHIPPING LABEL. PLEASE SAVE FOR YOUR RECORD.

SHIP DATE:
Tues, Oct 12, 2004

EXPECTED DELIVERY DATE:
WED, OCT 13, 2004 10:30 AM

SHIP FROM:
THE UPS STORE #1966
BC
5505 CONNECTICUT AVE NW
WASHINGTON DC 20015
(202) 244-6655

SHIP TO:
FEDERAL ELECTION COMMISSION
REPORTS DIVISION
999 E ST NW
WASHINGTON DC 20463-0001
Business

SHIPPED THROUGH:
THE UPS STORE #1966
WASHINGTON, DC 20015
(202) 244-6655

SHIPMENT INFORMATION:
UPS Next Day Air Com
0.54lbs/LTR Billed Weight,
Letter

Tracking Number: 1Z5100E60191001976

Shipment ID: [REDACTED]

Reference1: - -

Reference2: - -

DESCRIPTION OF GOODS:
- -

SHIPMENT CHARGES:
Next Day Air Com \$15.50
Service Options \$0.00
Fuel Surcharge \$1.47

Total \$16.97

COMPLETE ONLINE SHIPMENT TRACKING INFORMATION:
Enter any of the following addresses in your web browser to view tracking information:
<http://theupsstore.com> (select Tracking, then enter Tracking #)
<http://abs.com> (select Tracking, then enter Tracking #)
or <http://iship.com/track/trk.asp?ic=MGN4EPK0SR2>

QUESTIONS ABOUT YOUR SHIPMENT?
Contact the SHIPPED THROUGH facility listed above.

ShipmentID: [REDACTED]



Powered by iShip4u
10/12/2004 11:38 AM Pacific Time



International Shipping Notice: Carriage hereunder may be subject to the rules relating to liability and other terms and conditions established by the Convention for the Unification of Certain Rules Relating to International Carriage by Air (the "Warsaw Convention") and/or the Convention on the Contract for the International Carriage of Goods by Road (the "CMR Convention"). These conventions, technology or otherwise have been adopted from the U.S. in accordance with the Export Administration Regulations. Convention country in U.S. has simplified. For shipping details, call 1-800-762-7862. United Parcel Service, Louisville, KY

The UPS Store PARCEL SHIPPING ORDER

Rev. 6/03

CUSTOMER (please print)

PRINT NAME: CHRISTINE S. O'LEARY DATE: 10/12/2004
 STREET: P.O. Box 15638 PHONE: (202) 362 9064
 CITY/STATE/ZIP: HEVY CHASE MD 20825 E MAIL: _____

PARCEL SHIPPING ORDER
 No. **41121950**

PKG.	SENT TO:	LIST ALL CONTENTS	DECLARED VALUE	C.O.D. AMT.	ZONE	WT.	DM.	CK. ONE	Pkg. Charges Amt	Type
A	NAME: <u>Repob Division</u>	<u>DOCS</u>	\$ <u>16.99</u>	RESIDENTIAL <input type="checkbox"/> COMMERCIAL <input type="checkbox"/>	PACKED BY CUSTOMER <input type="checkbox"/>	REPLACEABLE <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>	SEE BACK		SHP CHG DEC VAL COD PKG LABOR PKG MAT
	STREET: <u>Federal Election Commission</u>									
	CITY/STATE/ZIP: <u>999 E. SV. NW</u>									
	E MAIL: <u>WASH DC 20463</u>									
B	NAME: _____		\$ _____	RESIDENTIAL <input type="checkbox"/> COMMERCIAL <input type="checkbox"/>	PACKED BY CUSTOMER <input type="checkbox"/>	REPLACEABLE <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>	SEE BACK		SHP CHG DEC VAL COD PKG LABOR PKG MAT
	STREET: _____									
	CITY/STATE/ZIP: _____									
	E MAIL: _____									
C	NAME: _____		\$ _____	RESIDENTIAL <input type="checkbox"/> COMMERCIAL <input type="checkbox"/>	PACKED BY CUSTOMER <input type="checkbox"/>	REPLACEABLE <input type="checkbox"/>	YES <input type="checkbox"/> NO <input type="checkbox"/>	SEE BACK		SHP CHG DEC VAL COD PKG LABOR PKG MAT
	STREET: _____									
	CITY/STATE/ZIP: _____									
	E MAIL: _____									

1. Subject to the terms and conditions herein, this The UPS Store™ center will receive and forward parcels for customer (You). The carrier for all parcels accepted by Parcel Acceptance is subject to refusal for shipment by the carrier. You represent that your true name and address appear above.

2. We do not accept hazardous material, illegal items or articles of unusual value, including but not limited to cash and jewelry for shipment.

3. We assume no liability for the delivery of the parcels accepted for shipment or for loss or damage by any cause to the parcels or their contents while in transit. We are not liable for the failure of the carrier to properly collect or remit funds for C.O.D. parcels. If recipient's form of payment is accepted for C.O.D. by the carrier, you assume all risk. You acknowledge that you have read the terms and conditions of this form.

and understand the instructions on the C.O.D. Tag and further agree that you accept all risk, including, but not limited to, risk of nonpayment, insufficient funds and forgery. You further agree that we will not be liable upon any such instrument.

(Continued on back)

CUSTOMER'S SIGNATURE
 I certify that I agree to the terms and conditions herein, and that the stated contents and the value of each package listed is truthful and complete.
 SIGN HERE: Christine S. O'Leary
 CUSTOMER COPY www.theupsstore.com

SUB-TOTAL \$ 16.99
TAX _____
TOTAL CHARGES \$ 16.99
CENTER # Thank You
EMPLOYEE'S INITIALS _____

Goto Page # Next Page Last Page PDF
TO REPORTS INDEX NEW SEARCH NEW ADVANCED
SEARCH

24038593218



**WESTERN
UNION**

CONFIRMATION OF MAILGRAM TO: MS. CATHERINE STELLA O'LEARY
 IRISH AMERICAN DEMOCRATS
 PO BOX 15638
 CHEVY CHASE MD 20823-5638

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

OCTOBER 20, 2004

AS-P

IDENTIFICATION NUMBER: C00320432

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2004 - 09/30/2004)

DEAR TREASURER:

YOUR COMMITTEE HAS FAILED TO FILE THE ABOVE-REFERENCED REPORT IN AN ELECTRONIC FORMAT. IN ACCORDANCE WITH 11 C.F.R. 104.18, YOU ARE REQUIRED TO FILE THIS REPORT, AND ALL SUBSEQUENT REPORTS FOR THE CALENDAR YEAR, ELECTRONICALLY. 11 C.F.R. 104.18 FURTHER STATES THAT REPORTS FILED ON PAPER DO NOT SATISFY A POLITICAL COMMITTEE'S FILING OBLIGATION. YOUR REPORTING OBLIGATION WILL NOT BE SATISFIED UNTIL YOU FILE THE ABOVE-REFERENCED REPORT IN AN ELECTRONIC FORMAT.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT DAYNA C. BROWN IN THE REPORTS ANALYSIS DIVISION ON OUR TOLL FREE NUMBER (800) 424-9530. OUR LOCAL NUMBER IS (202) 694-1130.

SINCERELY,

JOHN D. GIBSON
 ASSISTANT STAFF DIRECTOR
 REPORTS ANALYSIS DIVISION

26092584694

Irish American Democrats

To provide support to Democratic candidates who promote peace, justice, and prosperity in Ireland.

October 22, 2004

Ms. Dayna C. Brown
Reports Division
Federal Election Commission
999 E Street NW
Washington D.C. 20463

REF. C00320432

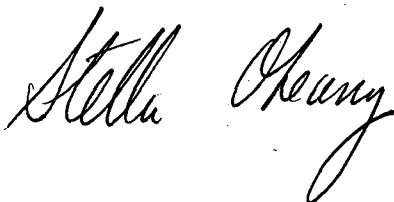
Dear Ms. Brown,

I am in receipt of your mailgram of October 20th, informing me that Irish American Democrats PAC is not in compliance because of failure to file electronically. As I explained in my two telephone conversations with you today, I understood that the FEC had granted Irish American Democrats an exception, based on a previous request to the Commission. That previously filed request, explained that the software is not available for Macintosh computers, which is what the PAC uses.

Following our two conversations today, I have purchased a PC and hired a software professional to begin entering the reports in question, in an electronic format, this weekend. I expect to have these reports filed with you early in the coming week.

In light of my understanding, that the PAC had been granted an exception because the software is still not available for Macintosh computers, I am requesting that you consider the paper filing as satisfying the filing requirement, until the electronic filing reaches you shortly.

Sincerely,



Irish American Democrats
PO Box 15638
Chevy Chase, MD 20825

Stella O'Leary
Chairperson/Treasurer

202-362-9064
fax 202-237-5141
irldems@erols.com

26092584695

Irish American Democrats

To provide support to Democratic candidates who promote peace, justice, and prosperity in Ireland.

July 27, 2001

Mr. Scott Walker
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington D.C. 20463

Identification Number COO320432

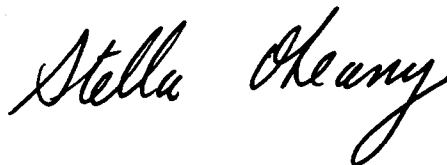
Reference: Six Month report (01/01/01 - 06/30/01)

Dear Mr. Walker,

This letter is to request a waiver of the electronic filing requirement for the year 2001. The reasons for this request are as follows:

- 1) We do not anticipate that we will raise in excess of \$50,000 this year.
- 2) Irish American Democrats PAC uses only Macintosh computers, and the software is not available for us to file electronically, using a MAC.

Sincerely,




Irish American Democrats
PO Box 15638
Chevy Chase, MD 20825

Stella O'Leary
President/Treasurer

202-362-9064
fax 202-237-5141
Email: irldems@erols.com
Internet: www.irishamericandemocrats.org

26092584696



CUSTOMER NAME CATHERINE S. O'LEARY	
ADDRESS 5744 OLIVER ST. NW	
CITY, STATE, ZIP WASH DC 20015	
HOME PHONE (202) 362-9064	WORK PHONE
QTY	PRICE
1	549.99
1	399.99
Model No.	
Compaq SR1214 NX	
emachines E174	

SPECIAL INSTRUCTIONS

YOUR CUSTOMER SERVICE PIN IS: 0801 051 0182 102204

MANAGER

KEEP YOUR RECEIPT!

Your original receipt is required for all returns, exchanges, price matches and warranty repair services.

We accept returns & exchanges 14 days from the original date of purchase

Digital Cameras, Notebooks, Computers, Monitors, Printers
WELCOME TO BEST BUY
WASHINGTON, DC 20008
1-800-859-6868

Val #: 1366-8659-7242-150415

We accept returns 14 days from the original date of purchase

on 05/24/00 05370382(10/22/04) 0453835 1080

Sale tax and access fees

You have purchased the following items:

6842B93 CPU SET-UP or DVD or VIDEO GAMES AND MUSIC for the same PC COMPUTER SET-UP or VIDEO GAMES AND MUSIC

E17T 17 399.99
E17T 17 MONITOR No refund on labor
6842B93 549.99
SR1214NX-K7 2200+512/256+DVD Computer Software
5250774 WR154GM Video Games and Music
802.11G WIRELESS ROUTER

Refunds of cash purchases over \$250 and credit card purchases over \$100 will be issued by check from our corporate office within 1 business day of return.

Restocking fee will be applied to ALL products not returned in like new condition including original box, packaging materials, accessories or manuals. A restocking fee of 25% will be charged on all returns or exchanges of any product.

I HAVE READ AND AGREED TO ALL RETURN AND REFUND POLICIES PRINTED ON THE BACK OF THIS RECEIPT AND POSTED IN THE STORE. I HAVE

RECEIVED GOODS AND/OR SERVICES IN THE AMOUNT SHOWN ABOVE

The Best Buy company policy requires you pay from out-in-store policies. Please FOR CUSTOMER SERVICE, IN-HOME INSTALLATION OR REPAIR CALL 1-888-BESTBUY details and more information at www.bestbuy.com

CUSTOMER SIGNATURE _____

CUSTOMER _____

1
2
3
4
5
6
7
8
9
10

Hannibal Software, Inc.

611 Pennsylvania Avenue S.E.

Suite #345

Washington, D.C. 20003

202.544.8117 fax 978.945.0795

Invoice No.

1025

INVOICE

Customer

Name Irish American Democrats
Address attn. Stella O'leary Box 15638
City Chevy Chase State MD Zip 20825
Phone _____

Date 10/22/2004
Order No. _____
Rep _____
FOB _____

Qty	Description	Unit Price	TOTAL
1	Hannibal Software for Pac with one year of support	\$1,000.00	\$1,000.00
1	Setup	\$200.00	\$200.00
	If you have any questions please call Jim		

Payment Details

- ☐ Cash
☒ Check
☐ Credit Card

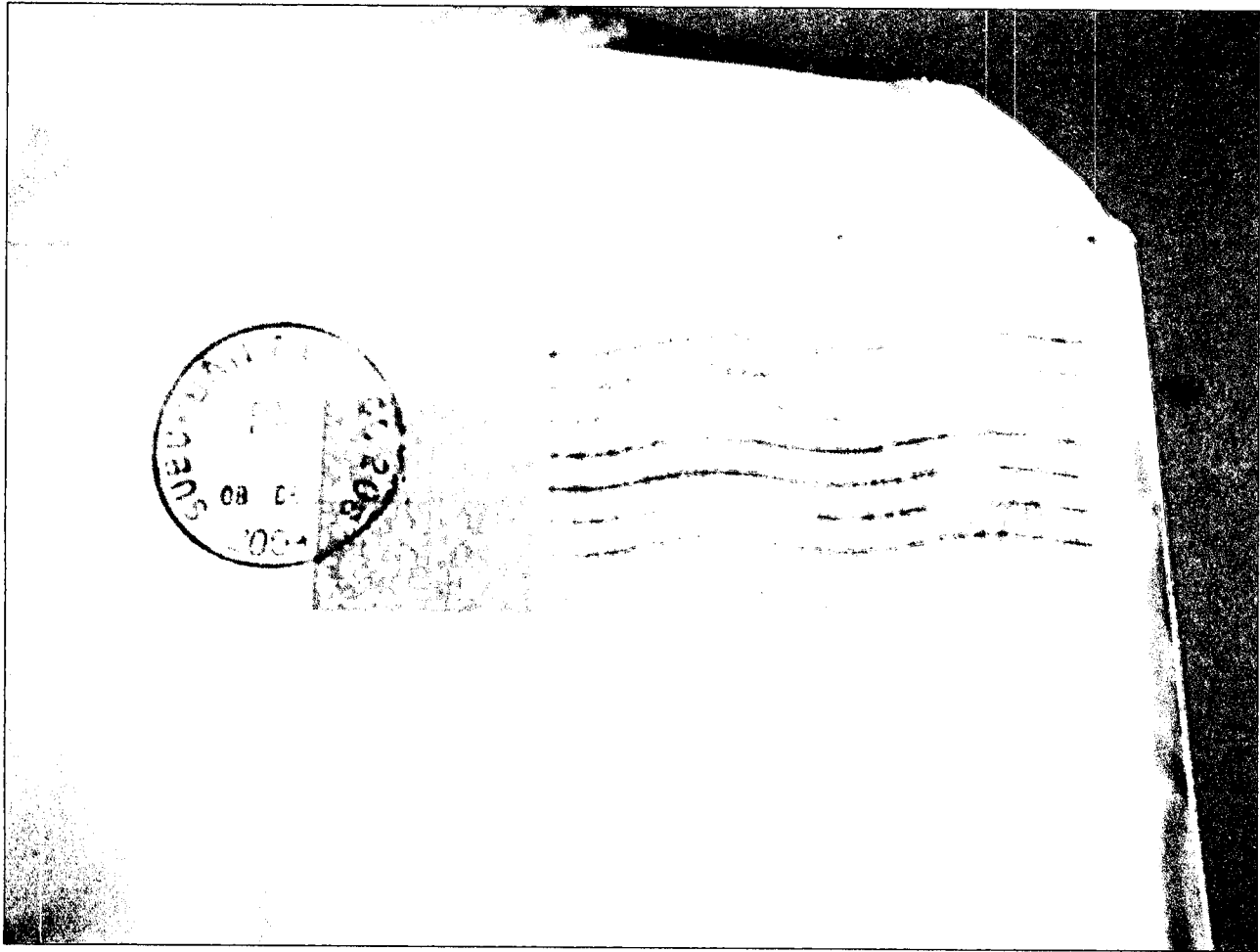
Name _____
CC # _____
Expires _____

SubTotal	\$1,200.00
Shipping & Handling	
Taxes	State
TOTAL	\$1,200.00

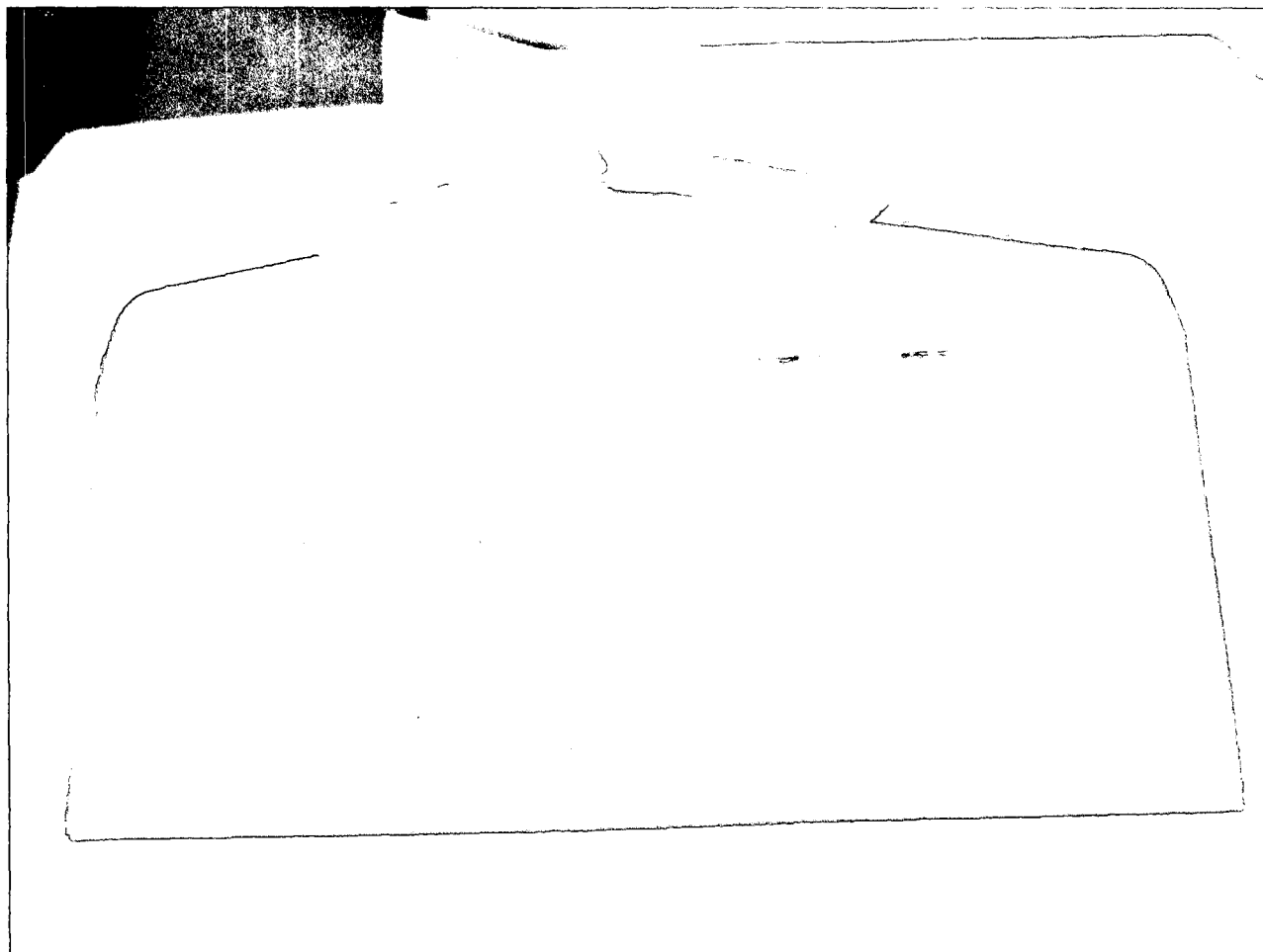
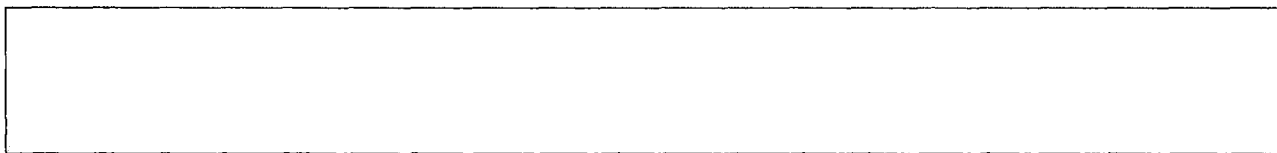
Office Use Only

Thank you for your business

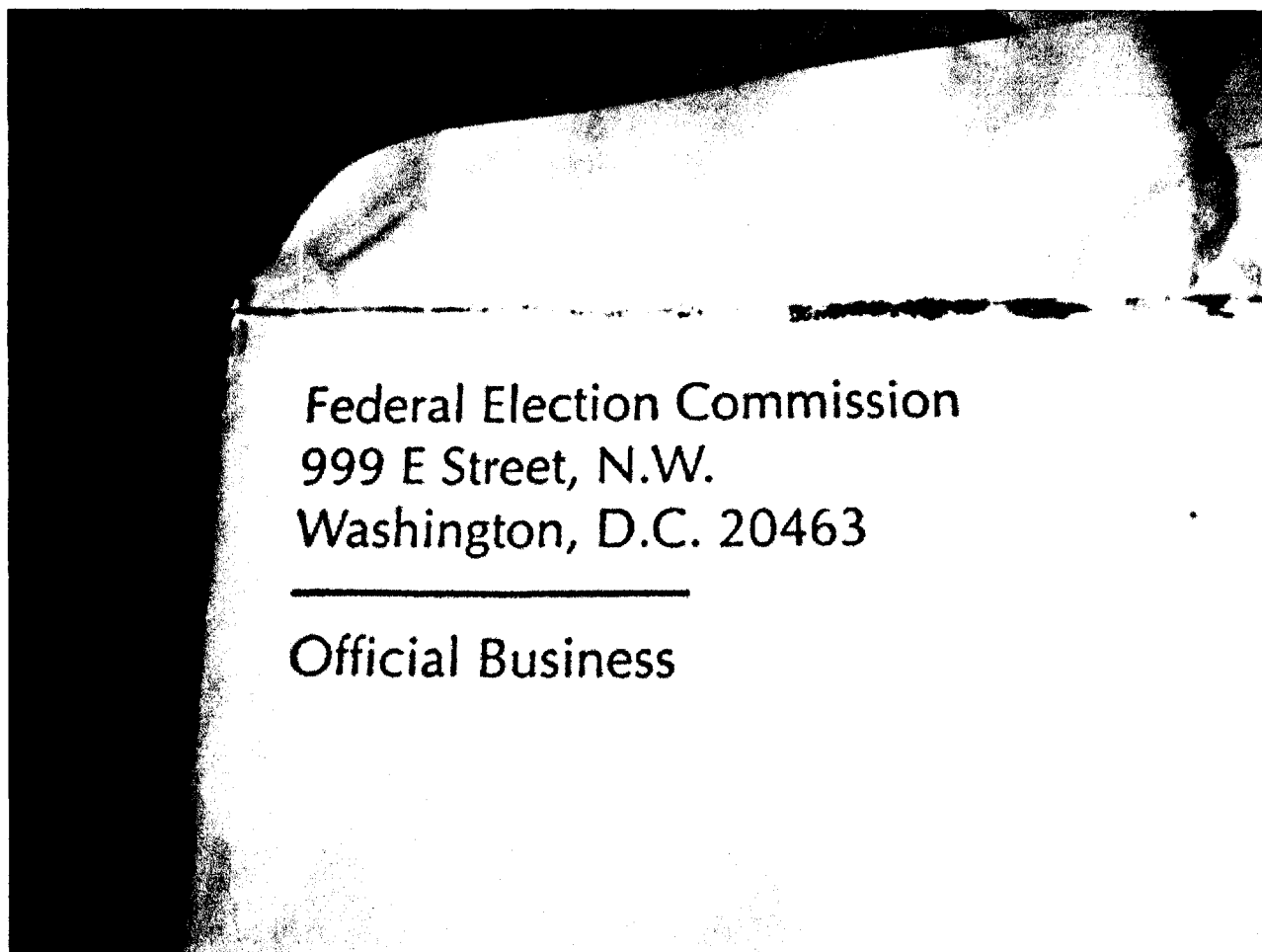
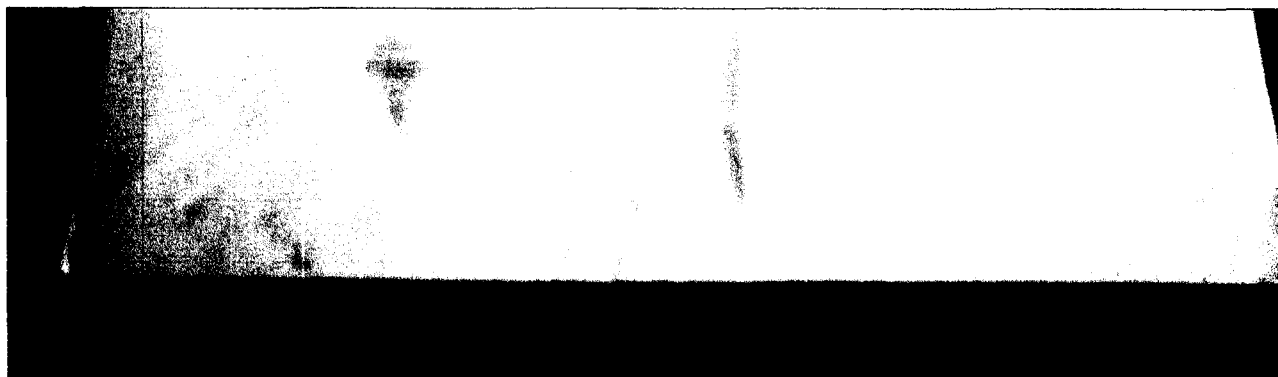
26092584698



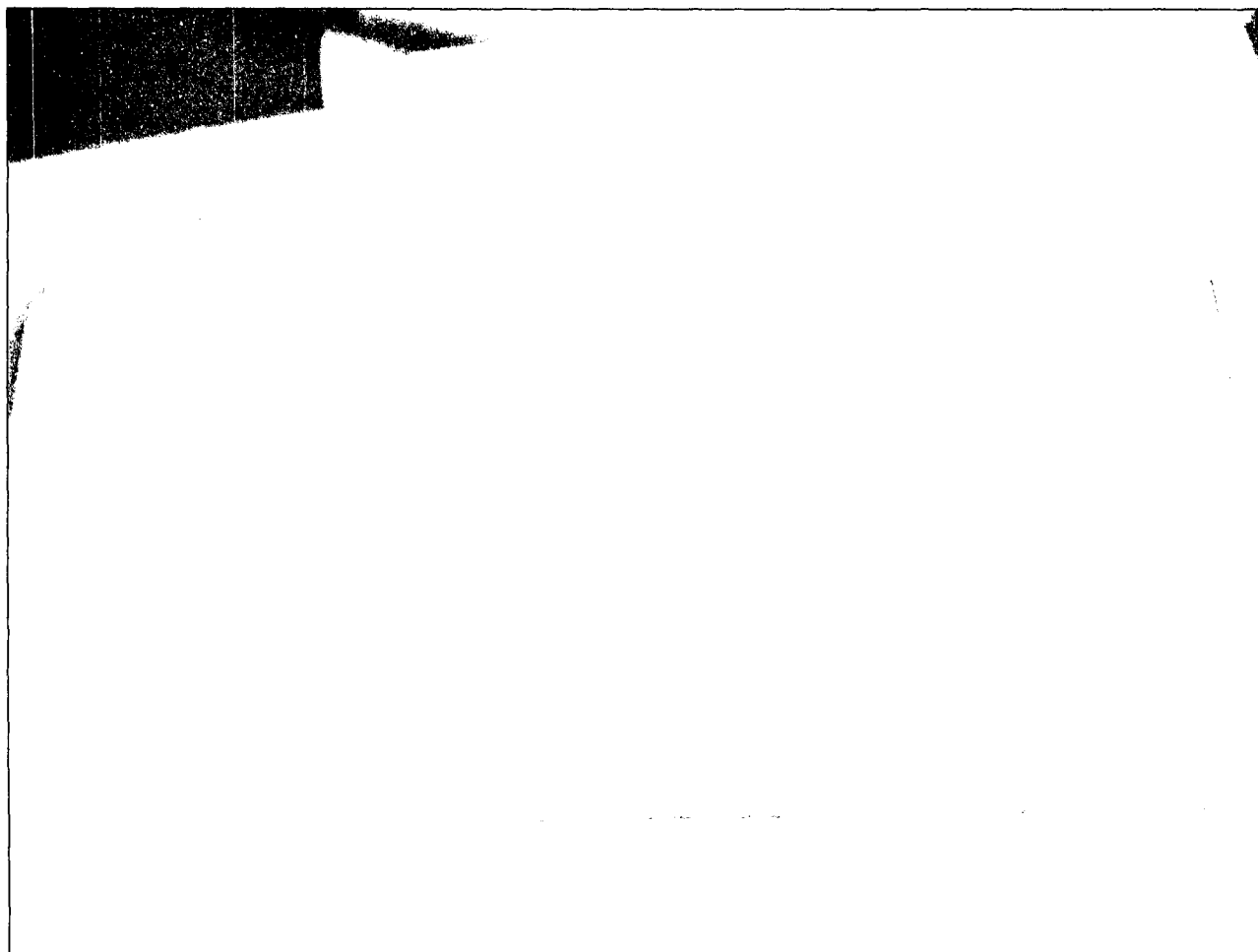
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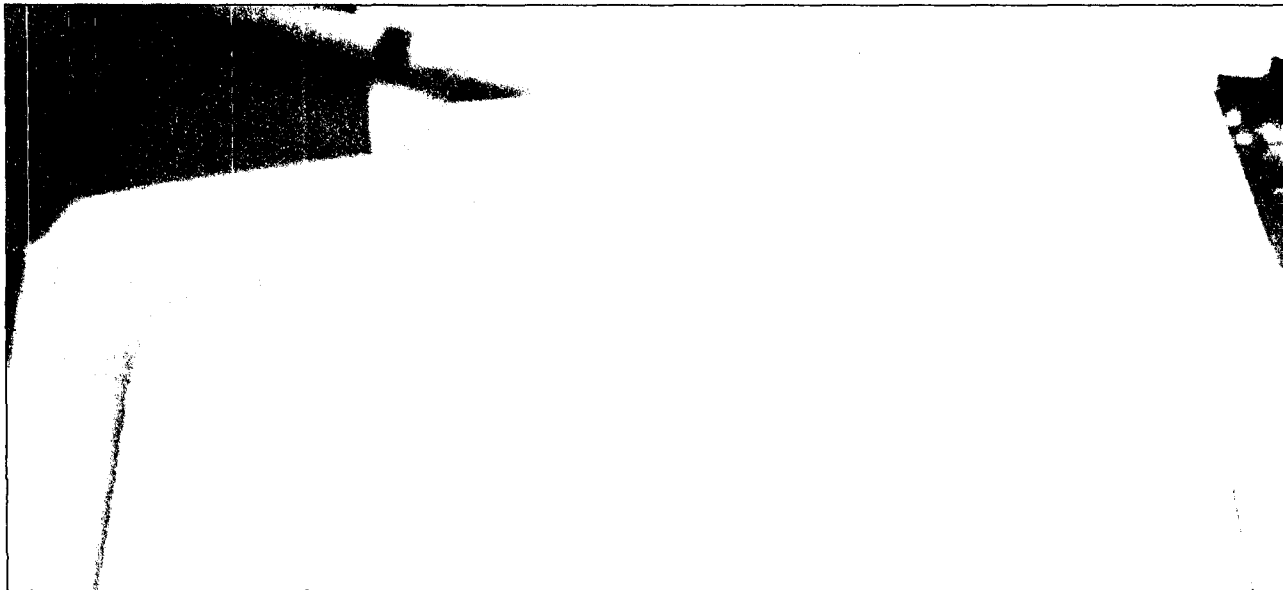
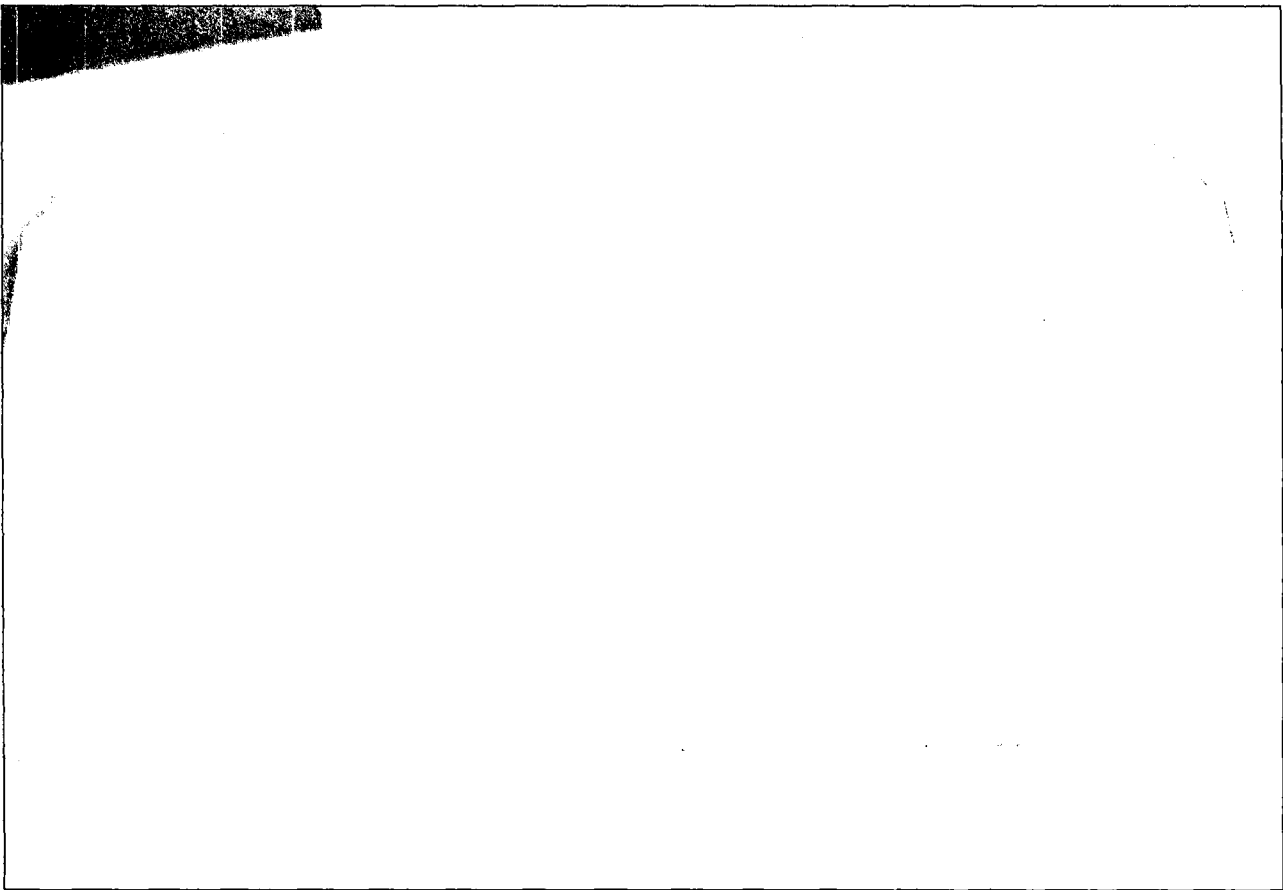
26092584700



26092584701



26092584702



26092584703



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Via First Class Mail

January 14, 2005

Catherine Stella O'Leary, as Treasurer
Irish American Democrats
PO Box 15638
Chevy Chase, Maryland 20825

C00320432
AF# 1193

Dear Ms. O'Leary:

On January 13, 2005, the Commission received your written response and supporting documentation ("challenge") for Irish American Democrats and you, as Treasurer, 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,

A handwritten signature in black ink, which appears to read "Shawn Woodhead Werth".

Shawn Woodhead Werth
Reviewing Officer
Office of Administrative Review

26092584704

2005 JAN 14 A 10:32

Date: January 14, 2005

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

AF#: 1193

Committee Name: Irish American Democrats

Committee ID#: C00320432

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

Treasurer Name (if different than in RTB finding): N/A

Attachments:

Copy of RTB Circulation Report Dated December 1, 2004 and RTB
Certification Dated December 6, 2004 – previously forwarded
Copy of RTB Mailgram: See Declaration
Certified Return Receipt (to be forwarded at later date if not yet received) -
Attachment #: 1

Original Correspondence Received by RAD in Response to
RTB Mailgram (Y/N): N
Attachment #: N/A
RAD Staff Declaration - Attachment #: 3

26092584705

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:

Catherine O'Leary
PO box 15638
Cherry Chase, Md
20825

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

CATHERINE S. O'LEARY 12/14/01

C. Signature

X Catherine S. O'Leary

☐ Agent

☒ Addressee

D. Is delivery address different from item 1?

If YES, enter delivery address below.

☐ Yes

☐ No

3. Service Type

☐ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number (Copy from se.

7002 0510 0002 8463 5812

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

ATTACHMENT #1

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 Irish American Democrats committee:
 - A) Prior Notice dated September 20, 2004 referencing the 2004 October Quarterly Report;
 - B) Electronic Filing Mailgram dated October 20, 2004 referencing the 2004 October Quarterly Report;
 - C) Reason-to-Believe Mailgram dated December 7, 2004, referencing the 2004 October Quarterly Report.
3. I hereby certify that I have searched the Commission's public records and find that the Irish American Democrats committee electronically filed the 2004 October Quarterly Report with the Commission on October 23, 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 14th day of January, 2005.



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

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 20, 2004

REPORTING DATES

REPORT	REPORTING PERIOD¹	REG./CERT. & OVERNIGHT MAILING DATE²	FILING DATE
October Quarterly	07/01/04 - 09/30/04	10/15/04	10/15/04

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 October. 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.shtml> 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.shtml>.

¹These 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.

²Quarterly 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)

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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 1st and the 20th 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/info/charts_ie_dates.shtml.

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/af.shtml>.
- 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/electfil/electron.shtml>.

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.

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**WESTERN
UNION**

CONFIRMATION OF MAILGRAM TO: MS. CATHERINE STELLA O'LEARY
IRISH AMERICAN DEMOCRATS
PO BOX 15638
CHEVY CHASE MD 20823-5638

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

OCTOBER 20, 2004

AS-P

IDENTIFICATION NUMBER: C00320432

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2004 - 09/30/2004)

DEAR TREASURER:

YOUR COMMITTEE HAS FAILED TO FILE THE ABOVE-REFERENCED REPORT IN AN ELECTRONIC FORMAT. IN ACCORDANCE WITH 11 C.F.R. 104.18, YOU ARE REQUIRED TO FILE THIS REPORT, AND ALL SUBSEQUENT REPORTS FOR THE CALENDAR YEAR, ELECTRONICALLY. 11 C.F.R. 104.18 FURTHER STATES THAT REPORTS FILED ON PAPER DO NOT SATISFY A POLITICAL COMMITTEE'S FILING OBLIGATION. YOUR REPORTING OBLIGATION WILL NOT BE SATISFIED UNTIL YOU FILE THE ABOVE-REFERENCED REPORT IN AN ELECTRONIC FORMAT.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT DAYNA C. BROWN IN THE REPORTS ANALYSIS DIVISION ON OUR TOLL FREE NUMBER (800) 424-9530. OUR LOCAL NUMBER IS (202) 694-1170.

SINCERELY,

JOHN D. WILSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEDERAL ELECTION
COMMISSION
SECRETARIAT

2006 JAN 30 A 9:51

January 27, 2006

MEMORANDUM

SENSITIVE

TO: THE COMMISSION

THROUGH: ROBERT J. COSTA
ACTING STAFF DIRECTOR *RC*

ANTHONY P. SCARDINO *APS*
DEPUTY STAFF DIRECTOR

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

SUBJECT: AF# 1193 - IRISH AMERICAN DEMOCRATS AND
CATHERINE STELLA O'LEARY, AS TREASURER
(C00320432)

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

26092584711



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 27, 2006

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

AF# 1193 – Irish American Democrats and Catherine Stella O'Leary, as Treasurer
(C00320432)

On December 6, 2004, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that the Irish American Democrats and Catherine Stella O'Leary, as Treasurer ("the respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2004 October Quarterly Report, an election sensitive report, in a timely manner. The Commission also made a preliminary determination that the civil money penalty was \$1,425 based on the schedule of penalties at 11 C.F.R. § 111.43. On December 7, 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 January 13, 2005, the Commission received the written response, in the form of an affidavit, and supporting documentation ("challenge") from the respondents challenging the RTB finding and proposed civil money penalty. The Treasurer states that the civil "money penalty is unwarranted and should be waived" because "a paper report was filed on time," the "Macintosh software is still not available from the FEC and ... we were compelled to invest in a PC and software consultant."

The respondents filed the October Quarterly Report "on paper on October 12th using UPS overnight [delivery] ... three days ahead of the due date." She states that on October 22, "10 days after the report was filed," they received notification that it "was not acceptable in written form and should be submitted electronically." That same day, they sent "a letter ... explaining ... why an electronic report had not been filed," and "[f]our working days later, ... submitted an electronic report."

The Treasurer explains that they "use Macintosh computers exclusively," a "state-of-the-art G5 Macintosh comparable to the best PC available." She states that their "operation depends heavily on in-house design for our publications and the MAC provides the versatility that we need for our graphic design." According to the Treasurer, the Macintosh "is a more secure computer than the PC" and "[t]here are very few programs that do not sell the software in both a MAC and PC platform." In 2001, they "requested a waiver from electronic filing since the FEC does not provide software for Macintosh" users and

[w]hile the request was for ... 2001, in several conversations with the Reports [Analysis] Division (Scott Walker), I was assured that the software for the Macintosh was being prepared and I could count on it being available when the PAC reached the \$50,000 threshold, which we did not reach until the third quarter of 2004. Each reporting period since I spoke with Scott Walker, I have looked to see if the software was available, but three years later [it] is still not available.

Because of the Commission's "unreasonable mandate ... that the only application available ... is a locally installed and Windows-based application," they "were forced to

acquire a PC" at a "cost [of] \$1,089" and "hire a consultant to install the software" at a "cost [of] \$1,200" which "serves no other purpose than to file FEC reports." This expense "would have been unnecessary if the software for a Macintosh was available" from the Commission.

The Treasurer also notes that the RTB notification "*arrived in a tampered envelope[]*" that "*had been carefully opened and resealed with ... scotch tape*" and "*does not meet the standard set out in your ... letter*" of confidentiality "*until it is placed on the public record in accordance with 11 C.F.R. 111.42.*" [Emphasis in original.] She states that Mary Seiler in OAR told her that

it is likely that an FEC employee opened the certified letter.... [I]t may be that the original notice from Western Union was accidentally mailed to the FEC and ... someone at the FEC opened it and realizing that it was mailed to the wrong address put scotch tape on it and re-certified it and resent it.... [Ms. Seiler] reported that nobody in the mailroom remembered seeing it and she hoped to find out who did.... I await further information ... on the matter. [Emphasis in original.]

Copies of eight documents, labeled "items," are included with the challenge. Item #1 is a paper copy of the October Quarterly Report, dated "10 12 2004." Item #2 is a "UPS Receipt" which consists of a "Shipment Receipt" and a "UPS Store PARCEL SHIPPING ORDER." The "Shipment Receipt" lists "Oct 12, 2004" as the "SHIP DATE" by "Next Day Air" to the Commission and an "EXPECTED DELIVERY DATE" of "OCT 13, 2004." The "SHIPPING ORDER," dated "10/12/2004," lists "DOCS" to be shipped by "NEXT DAY AIR" to the Commission.

Item #3 is a failure to file in an electronic format notification dated October 20, 2004 which references the October Quarterly Report. Item #4 is a letter dated October 22, 2004 from the Treasurer, in response to the October 20 notification, which says that she

understood that the FEC had granted [the Committee] an exception, based on a previous request to the Commission ... [which] explained that the software is not available for Macintosh computers, which is what the PAC uses. Following our two conversations today, I have purchased a PC and hired a software professional to begin entering the reports ... this weekend.... In light of my understanding, that the PAC had been granted an exception because the software is still not available for Macintosh computers, I am requesting that you consider the paper filing as satisfying the filing requirement, until the electronic filing reaches you....

Item #5 is a letter dated July 27, 2001 to "request a waiver of the electronic filing requirement for ... 2001" because "[w]e do not anticipate that we will raise in excess of \$50,000 this year," the Committee "uses only Macintosh computers," and "software is not available for us to file electronically, using a MAC." Item #6 is a "Receipt for Computer" with two slips, one of which is from "BEST BUY" with "10/22/04" circled. The Treasurer's name is on both slips for the purchase of two items with the same model number and price: one item is an "E17T" monitor at a cost of "399.99" and the second item is a "Compaq SR1214NX" at a cost of "549.99." The total of "1,089.19" is circled. Item #7 is the Committee's "Receipt for Software" from "Hannibal Software, Inc.," dated "10/22/04," for "one year of support" for "\$1,000.00" and "Setup" for "\$200.00." Item #8 is the "Tampered envelope from FEC" which consists of 5 pages of photographs of the front and back of a window envelope. The Commission's name and return address appear in the upper left-hand corner of the envelope's front. In the upper right hand corner of the envelope's front is a "UNITED STATES POSTAGE" stamp with the words "PITNEY BOWES" under the stamp, followed by "02 1A \$ 00.37 ... 0004343720 DEC 08 2004 MAILED FROM ZIP CODE 20500." In the same

corner, to the left, is the U.S. Postal Service round stamp dated "08 DEC 2004." The envelope's flap appears to have two pieces of tape attached to it.

Supplemental Requests and Responses

The Treasurer says that they requested a waiver from electronic filing for 2001 because they use a Macintosh computer which is not compatible with the Commission's electronic filing program. RAD staff subsequently "assured [her]" that the Commission was developing electronic filing software for Macintosh computers but because it is "still not available," she was "forced to acquire a PC" to electronically file the report. As a result, OAR sent supplemental requests to RAD and the Information Technology Division ("ITD") on February 7, 2005, requesting information about the issues raised in the challenge.

In his July 7, 2005 response, the Manager of ITD's Systems Analysis and Design Branch states that the Electronic Filing Office ("EFO") logs show that, on October 22, 2004,

Ms. Catherine O'Leary ... phoned ... with questions about using a Macintosh computer to file electronically and how to obtain a password. Ms. Eliza Green ... answered Ms. O'Leary's questions and instructed her on how to obtain a password. Later that day, the EFO received by fax a Password Request Letter.... Ms. Green phoned ... and left a voice message for Ms. O'Leary to call back so a password could be assigned. [On] October 25, 2004[:] Ms. Catherine O'Leary phoned the EFO and was assigned an electronic filing password.

The ITD Manager then addresses the respondents' inability to file using a Macintosh computer, noting that

after promulgating regulations and developing procedures to permit voluntary electronic filing of FEC reports, there was a clear need to gather additional information from the various committees required to file disclosure reports. In June 1997, the FEC engaged the services of an independent consulting firm ... to design and implement the FEC Survey for Electronic Filing. Results from the survey were intended to be used to ensure that the then new electronic filing system would be as compatible as possible with the needs and capabilities of the filing community at large. Results from the survey showed that only 2% of committees used Macintosh computers solely and that 88% were using an IBM-compatible Windows based system. Based on these findings, the EFO developed FECFile for a Windows based system exclusively with no intention to develop the software for the Macintosh computer platform.

He says that the "decision to not develop software for the Macintosh computer platform was not stated on the website or in the software manual. It has been added to both places."

With respect to support or assistance provided to filers, he explains that

[a]s a policy, the EFO does not provide support for other computer operating systems or configurations. In an effort to help callers who are Macintosh users and need to electronically file reports, the EFO staff has suggested, as one possible solution, the use of a Microsoft Windows emulator, such as Virtual PC, to run FECFile in a Macintosh environment.

In her February 9, 2005 response, the Branch Chief of RAD's Party/Non-Party Branch states that they have "no record of any telephone conversations with the Irish American Democrat[s] [c]ommittee concerning electronic filing and the filing of the 2004 October Quarterly Report." RAD submitted written records for three telephone conversations ("telecons") with its declaration. In the first of two telecons for October 22, 2004, Dayna Brown of the Compliance Branch states that the Treasurer

called regarding the [failure to file in an electronic format notification] ... referencing the ... [October Quarterly] report.... Ms. O'Leary stated that she had previously sent a letter to the Commission requesting an exception [to] this requirement [because] she uses a MAC ... and our software was not MAC compatible. She further stated that her request was not denied. Ms. O'Leary [said] that she understood that the regulations stated that committees are required to file electronically once they reach \$50K in contributions and expenditures, and that if need be, she could purchase a new computer which would be compatible to our IBM software. I informed Ms. O'Leary that her question ... would best be answered by our electronic filing department.... [S]he asked if she could send in a letter requesting an exception due to the incompatibility of the software to her computer. I told [her] that while she was welcome to file such a letter, doing so would not negate the regulation which requires the committee to file electronically by the specified deadlines. I then transferred her to the EFO....

In her second telecon, Ms. Brown states that the Treasurer

called back to let me know she had spoken with the [EFO], as well as several other staff ... and confirmed that the FECFile software is not MAC compatible. Ms. O'Leary ... informed me that she would be purchasing a Dell PC and it will be delivered and installed on next Monday.... Ms. O'Leary informed me that she would have her [October Quarterly and 12 Day Pre-General] reports to the Commission by Wednesday of next week[,] and ... will be sending in a memo detailing this information.

Ms. Brown's October 28, 2004 telecon states that the Treasurer called and said that "she had filed ... her [October Quarterly and 12 Day Pre-General] reports electronically."

Analysis of Challenge

The 2004 October Quarterly Report was electronically filed on October 28, 2004, 13 days late. A paper copy was sent via UPS Overnight Delivery Service on October 12, 2004 and received on October 13, 2004.

The Federal Election Campaign Act ("Act") requires that quarterly reports be filed by the treasurer no later than the 15th 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)(A). Effective for reporting periods beginning after December 31, 2000, all political committees must file in an electronic format if they have received contributions or made expenditures, or expect to receive contributions or make expenditures, in a calendar year aggregating in excess of \$50,000. Once a political committee exceeds or has reason to expect to exceed the appropriate threshold, it must file electronically all subsequent reports covering financial activity for the remainder of the calendar year. Reports filed on paper do not satisfy a political committee's filing obligations. 2 U.S.C. § 434(a)(11) and 11 C.F.R. § 104.18(a). If a political committee voluntarily chooses to file its reports electronically, the committee must continue to file in an electronic format all reports covering financial activity for that calendar year, unless the Commission determines that extraordinary and unforeseeable circumstances have made it impracticable for the political committee to continue filing electronically. 11 C.F.R. § 104.18(b). 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 treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d). Any notification made under 2 U.S.C. § 437g shall not be made public by the Commission or by any person without the consent of the person receiving the notification. 2 U.S.C. § 437g(a)(12)(A) and 11 C.F.R. § 111.21(a).

One issue in their challenge concerns the confidentiality of the RTB notification which they received. They provide scanned images of a pre-printed Commission envelope which has a Pitney Bowes meter stamp and the U.S. Postal Service ("USPS") round postmark stamp, both dated December 8, in the upper right-hand corner. The envelope's flap, according to the respondents, had been opened and resealed with scotch tape before they received it, indicating that it had been tampered with and did not remain confidential as required by the statute.

The Commission sends administrative fine notifications to respondents via Western Union ("WU") mailgrams. Each mailgram is printed on WU letterhead, put in a WU envelope with two windows, one for the Commission's return address and one for the respondents' address, and is given to the USPS for delivery by certified mail, return receipt requested. This is what should have happened on December 7 when the Commission transmitted the respondents' RTB notification to WU.

As is evident from the scanned images, this did not happen. The day after RAD transmitted the RTB notification to WU, the WU mailgram was instead put in the Commission's pre-printed envelope bearing two December 8 postmarks: the Commission's Pitney Bowes postal meter stamp and the USPS's round postmark stamp. According to the USPS "Track & Confirm [E]mail Restoration," notice was left for the respondents on December 9. The return receipt card RAD provided with its declaration shows that they signed for it on December 14.

The Reviewing Officer can only speculate that this occurred because the Commission's rather than the respondents' address appeared in the addressee's window of the WU envelope, so the Commission rather than the respondents received the mailgram on December 8, the day after it was originally transmitted to WU. Commission staff apparently realized that the mailgram should have been sent to the respondents, put it in a Commission envelope and attached the return receipt card, ran the envelope through the Commission's postal meter, and gave it to the USPS for delivery, which the USPS did the next day.

Commission staff is prohibited from making public the RTB notification as the respondents have not provided their written consent. The confidentiality requirements also apply to persons other than Commission staff. There is no indication from the challenge that the contents of the RTB notification were made public by Commission staff or any other person.

The second issue in their challenge concerns the Commission's electronic filing requirements. Prior Notice for the October Quarterly Report, sent to them on September 20, 2004, tells treasurers that they must file their reports electronically if the committee received contributions or made expenditures in excess of \$50,000 for the calendar year. The Notice informs electronic filers that if they instead file on paper they will be considered non-filers and may be subject to enforcement action. The "Electronic Filing" handout included with the Notice explains the mandatory electronic filing requirements in more detail, lists the "formulas" treasurers can use to determine if their committees exceeded the \$50,000 mandatory electronic filing threshold, and includes a section on the distinction between mandatory and voluntary electronic filing. This section tells treasurers that the regulations at 11 C.F.R. § 104.18(b) require them to continue filing electronically for the remainder of the calendar year unless the Commission determines "that unusual circumstances make continued electronic filing impractical" but that "[n]o such waiver by the Commission ... has been established for mandatory electronic filers." The same information is provided in an article

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titled "Electronic Filing Overview," under the heading "Voluntary Electronic Filing," on the Electronic Filing section of the Commission's web site.¹

In her October 22, 2004 letter, the Treasurer states that they "understood that the FEC granted" them the waiver they requested in 2001. There is no indication from a review of Commission records that the respondents were told, either in writing or in a conversation with their Analyst, that their 2001 request was approved. In addition, the electronic filing regulations are clear that the waiver request only applies to voluntary electronic filers, not mandatory electronic filers, and the respondents fell into neither category at that time.

Commission records show that they filed subsequent 2001 through October 2004 reports on paper. During this period, the Treasurer says that she continued to check "[e]ach reporting period" to see if the software for Macintosh users was available from the Commission, as the RAD Analyst told her it would be, "but three years later [it] is ... not."

According to the ITD Manager, after implementation of voluntary electronic filing, a 1997 survey of filers found that almost 88% used an IBM-compatible Windows system compared to 2% which used Macintosh computers. Based on these results, the Commission designed the electronic filing system and its FECFile software as Windows based applications. Beginning in 1999, articles in the FEC Record and at the electronic filing section of the website as well as information in the FECFile User Manuals told readers they would need a PC with Windows to electronically file their reports.

He also explains, however, that this decision (to not develop a separate electronic filing application for Macintosh computers) was not included on the Commission's website or in the FECFile User Manuals. He states that this decision now appears on the website and in the Manuals. He says that the EFO staff offers one possible solution, the use of a Windows emulator, to Macintosh users who call for help even though it is the EFO's policy to not provide support for other computer operating systems.

Based on the respondents' challenge, the RAD telecons, the EFO logs, the ITD Manager's response, and the Commission's records, the respondents knew in July 2001 that they had to electronically file reports if and when they exceeded the \$50,000 threshold, and that electronic filing software was not available for Macintosh computers. They believed that their waiver request was granted but there is no indication that the Commission told them that it was approved. Nonetheless, over the next three years, they continued to check each reporting period to see if software for Macintosh users was available. Each time, they found it was not, so they sent each report (including the 2004 October Quarterly Report) on paper. While the decision to not develop this software had already been made, the ITD Manager says that this decision was not included on the Commission's website and in the User Manuals. In addition, when asked by Macintosh users who called for assistance, the EFO staff suggested the use of a Windows emulator as one possible solution to electronically filing a report on a Macintosh computer.

Once a committee exceeds the mandatory electronic filing threshold, the treasurer is required to electronically file its reports. 2 U.S.C. § 434(a)(11) and 11 C.F.R. § 104.18. There is no exception to this requirement because a filer's computer system is not compatible with a Windows based computer system. The Reviewing Officer believes that the

¹ In September, 2004, the Commission redesigned its web site and the web site address for electronic filing information was changed to <http://www.fec.gov/electfil/electron.shtml>.

respondents had sufficient notice and opportunity to take the steps necessary to file the 2004 October Quarterly Report on time and electronically once they crossed the \$50,000 threshold.

The Reviewing Officer recognizes, however, that the decision to not develop software for Macintosh users was not made clear to filers during this period. Furthermore, when the respondents called the EFO for help to electronically file the report, they were not offered the option of a Windows emulator as a possible solution to electronically file their report. The Reviewing Officer believes that had they been offered this solution, they may have been able to use their existing Macintosh computer to electronically file the October Quarterly Report rather than having to buy a new computer with a Windows operating system and hiring a consultant. The Reviewing Officer, therefore, recommends that the Commission take no further action and close the file in this matter.

OAR Recommendations

- (1) Take no further action in AF# 1193 that the Irish American Democrats and Catherine Stella O'Leary, as Treasurer, violated 2 U.S.C. § 434(a) and close the file; and
- (2) Send the appropriate letter.

Attachments

Attachment 1 - Challenge Received from Respondents

Attachment 2 -

Attachment 3 -

Attachment 4 -

Attachment 5 - USPS Form 3811, Domestic Return Receipt, Provided with RAD Declaration
for Article Number 7002 0510 0002 8463 5812 and USPS Track & Confirm
Email Restoration for Label Number 7002 0510 0002 8463 5812

Attachment 6 - Copy of a Western Union Envelope

Attachment 7 - Declaration from RAD

Attachment 8 - Declaration from OAR

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> 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. 		<p>A. Received by (Please Print Clearly) <u>PATHERINE S. O'LEARY</u> B. Date of Delivery <u>12/14/01</u></p> <p>C. Signature <u>X Catherine S. O'Leary</u> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
<p>1. Article Addressed to:</p> <p><u>Catherine O'Leary</u> <u>Po box 15638</u> <u>Cherry Chase, Md</u> <u>20825</u></p>		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input checked="" type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>2. Article Number (Copy from se)</p> <p><u>7002 0510 0002 8463 5812</u></p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952

UNITED STATES POSTAL SERVICE



First-Class Mail
 Postage & Fees Paid
 USPS
 Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

FEC RTS
999 E Street, NW
Washington D.C. 20463



26092584719



"U.S._Postal_Service_"
<U.S._Postal_Service@usps.
com>

11/18/2005 09:28 AM

To swoodhead@fec.gov

cc

bcc

Subject U.S. Postal Service Track & Confirm email Restoration -
7002 0510 0002 8463 5812

This is a post-only message. Please do not respond.

Shawn Woodhead Werth has requested that you receive this restoration
information
for Track & Confirm as listed below.

Current Track & Confirm e-mail information provided by the U.S. Postal
Service.

Label Number: 7002 0510 0002 8463 5812

Service Type: Certified

Shipment Activity	Location	Date & Time
--		
Delivered 4:07pm	CHEVY CHASE MD 20825	12/14/04
Notice Left 1:08pm	CHEVY CHASE MD 20825	12/09/04

USPS has not verified the validity of any email addresses submitted via its
online Track & Confirm tool.

For more information, or if you have additional questions on Track & Confirm
services and features, please visit the Frequently Asked Questions (FAQs)
section of our Track & Confirm site at
<http://www.usps.com/shipping/trackandconfirmfaqs.htm>

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Attachment # 6
1 Page

**Mallgram
Postage Charges
and Fees
PAID
Western Union**



UNITED STATES
POSTAL SERVICE

This Mailgram message was transmitted electronically by Western Union for delivery by a post office near you.

[illegible]

**WESTERN
UNION MAILGRAM[®]**

[illegible]

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 Irish American Democrats committee:
 - A) Prior Notice dated September 20, 2004 referencing the 2004 October Quarterly Report;
 - B) Electronic Filing Mailgram dated October 20, 2004 referencing the 2004 October Quarterly Report;
 - C) Reason-to-Believe Mailgram dated December 7, 2004, referencing the 2004 October Quarterly Report.
3. I hereby certify that I have searched the Commission's public records and find that the Irish American Democrats committee electronically filed the 2004 October Quarterly Report with the Commission on October 23, 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 14th day of January, 2005.



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

26092584722

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 20, 2004

REPORTING DATES

REPORT	REPORTING PERIOD ¹	REG./CERT. & OVERNIGHT MAILING DATE ²	FILING DATE
October Quarterly	07/01/04 - 09/30/04	10/15/04	10/15/04

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 October. 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.shtml> 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.shtml>.

¹These 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.

²Quarterly 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.

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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 1st and the 20th 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/info/charts_ie_dates.shtml.

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/af.shtml>.
- 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.shtml>.

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.

24038503218

**WESTERN
UNION**

CONFIRMATION OF MAILGRAM TO: MS. CATHERINE STELLA O'LEARY
IRISH AMERICAN DEMOCRATS
PO BOX 15638
CHEVY CHASE MD 20823-5638

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

OCTOBER 20, 2004

AS-P

IDENTIFICATION NUMBER: C00320432

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2004 - 09/30/2004)

DEAR TREASURER:

YOUR COMMITTEE HAS FAILED TO FILE THE ABOVE-REFERENCED REPORT IN AN ELECTRONIC FORMAT. IN ACCORDANCE WITH 11 C.F.R. 104.18, YOU ARE REQUIRED TO FILE THIS REPORT, AND ALL SUBSEQUENT REPORTS FOR THE CALENDAR YEAR, ELECTRONICALLY. 11 C.F.R. 104.18 FURTHER STATES THAT REPORTS FILED ON PAPER DO NOT SATISFY A POLITICAL COMMITTEE'S FILING OBLIGATION. YOUR REPORTING OBLIGATION WILL NOT BE SATISFIED UNTIL YOU FILE THE ABOVE-REFERENCED REPORT IN AN ELECTRONIC FORMAT.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT DAYNA C. BROWN IN THE REPORTS ANALYSIS DIVISION ON OUR TOLL FREE NUMBER (800) 424-9530. OUR LOCAL NUMBER IS (202) 694-1130.

SINCERELY,

JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

DECLARATION OF SHAWN WOODHEAD WERTH

1. I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I supervise research conducted with respect to all challenges submitted in accordance with the Administrative Fine program.
2. The 2004 October Quarterly Report is due October 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 October 15 to be timely filed.
3. It is the practice of the Commission's Information Division to send prior notification of a report's due date to treasurers and committees at their address of record approximately 3 weeks before the due date and to include the Electronic Filing handout with each Prior Notice. It is also the practice of this Division to send the Record to treasurers and committees at their address of record.
4. It is the practice of the Commission's Reports Analysis Division to send a mailgram to mandatory electronic filing committees and treasurers at their address of record notifying them that they failed to file a report in an electronic format. It is this Division's practice to send administrative fine notifications by Western Union mailgrams which are delivered to committees and treasurers via certified mail, return receipt requested. It is the practice of this Division's Party/Non-Party Branch to document all calls to or from committees regarding a letter or mailgram they received or any questions relating to the administrative fine regulations including due dates of reports and filing requirements.
5. It is the practice of the Commission's Mail Room to use the Commission's Pitney Bowes postage meter to apply postage to each piece of outgoing Commission mail.
6. It is the practice of the Commission's Information Technology Division to maintain the Commission's web site at http://www.fec.gov/electfil/ef_overview.shtml and <http://www.fec.gov/support/index.shtml> for the use of committees and treasurers to access articles and view information about electronic filing and the electronic filing of reports (formerly located at http://www.fec.gov/electfil/ef_overview.html and <http://www.fec.gov/support/index.html>, respectively).
7. 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) cover letter dated July 27, 2001 and Detailed Summary Pages for the 2001 Mid Year Report filed by the Irish American Democrats and Catherine Stella O'Leary, as Treasurer. According to the Commission's records, the letter and report were received on August 1, 2001. On Line 11(d), it lists \$1,510.00 in total contributions for the period and calendar year-to-date. On Lines 21(a)(i) and (b), it lists \$609.96 for the federal share of shared federal/non-federal activity and \$2,539.85 for other federal operating expenditures for the period and calendar year-to-date. The cover letter is signed by Stella O'Leary, is addressed to Scott Walker, and says that they "request a waiver of the electronic filing requirements for ... 2001. The reasons ... are ...: 1) [w]e do not anticipate that we will raise in excess of \$50,000 this year. 2) [the Committee] uses only Macintosh computers, and the software is not available for us to file electronically, using a MAC;"
 - b) Page 1 of the Summary Page, the Detailed Summary Pages, and the Envelope Replacement Page for the paper copy of the report for the Irish American Democrats and Catherine Sheila O'Leary, as Treasurer. According to the

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Commission's records, the paper copy covers the period of July 1 through September 30, 2004, was sent via overnight delivery service UPS on October 12, 2004, and received on October 13, 2004. Line 11(d) lists \$57,622.99 in total contributions for the calendar year-to-date and Line 28(c) lists \$1,000.00 in contribution refunds made to other political committees;

- c) letter dated October 22, 2004, signed by Catherine Stella O'Leary, and addressed to Dayna Brown. According to the Commission's records, the letter was received on October 25, 2004. In the letter, Ms. O'Leary says that "I understood that the FEC had granted [the Committee] an exception, based on a previous request.... That ... request, explained that the software is not available for Macintosh computers, which is what the PAC uses;" and
 - d) Page 1 of the Summary Page and Page 3 of the Detailed Summary Page for the 2004 October Quarterly Report filed electronically by the Irish American Democrats and Catherine Sheila O'Leary, as Treasurer. According to the Commission's records, the report covers the period of July 1 through September 30, 2004 and was received on October 28, 2005. Line 11(d) lists \$58,035.20 in total contributions for the calendar year-to-date.
8. 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 27th of January, 2006.



Shawn Woodhead Werth
Reviewing Officer
Office of Administrative Review
Federal Election Commission

26092584727

Record

June 1999

Federal Election Commission

Volume 25, Number 6

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Court Cases

Perot '96 v. FEC (98-1022)

On April 12, the U.S. District Court for the District of Columbia dismissed this case with prejudice at the plaintiff's request.

Perot '96, the 1996 committee of former Reform Party Presidential candidate Ross Perot, had asked the court to find that the FEC acted contrary to law in dismissing an administrative complaint that Perot '96 had filed against the Commission on Presidential Debates (CPD). The CPD had sponsored the 1996 Presidential debates to which Mr. Perot was not invited to participate.

Perot '96 had asked the court to order the FEC to take action on the complaint or to find that the agency's regulations governing nonpartisan candidate debates were unconstitutional. 11 CFR 110.13 and 114.4(f). At the time of the plaintiff's voluntary motion to dismiss with prejudice, the Commission's motion to dismiss for lack of standing was pending and awaiting judgment. For a full description of this case, see the June 1998 Record, p. 3.

U.S. District Court for the District of Columbia, 98-1022. ♦

Electronic Filing

Q & A for FEC's Electronic Filing Program

Just as the FEC electronic filing system has made filing faster and easier, it has also prompted new questions from the filing community. Although some questions are unique to a particular committee or situation, many are commonly asked by first-time electronic filers. See some of the most frequently asked questions—and the answers—below.

Must I start filing electronically at the beginning of the year?

No. Filers may begin filing electronically at any time. By starting as soon as possible, however, filers minimize the amount of previous-period data that must be entered to ensure accurate year-to-date figures.

Do I need to have my electronic format approved prior to filing?

No. This misconception is common among those who currently file paper reports generated by computer software. Committees that file paper reports generated by a computer must obtain FEC approval of their format prior to using it. By contrast, the format for electroni-

(continued on page 2)

Electronic Filing

(continued from page 1)

cally filed reports requires no advance approval.

Isn't electronic filing for Presidential committees only?

No. While it is true that Presidential committees that accept matching funds are *required* to file electronically, all other campaign committees, and PACs and party committees, may *elect* to participate in the FEC's electronic filing program.

I must be connected to the Internet to file electronically, right?

No. Using the Internet to upload reports is just one way to submit electronically filed reports to the Commission. Filers may also file directly from their modems to the FEC's modems. The third option is to save computer-generated reports to a diskette and mail it to the FEC. Using a diskette allows those who have no modem or Internet access to

participate in electronic filing. It also provides a backup filing method in cases where Internet access or phone service is temporarily interrupted.

Can I e-mail my report to the FEC?

No. E-mail is not secure enough to handle electronic filing and provides no method for evaluating filing.

How does the treasurer "sign" an electronic report?

The treasurer's signature required on a paper filing is replaced by the treasurer's password for filing electronically. To obtain a password, the treasurer must submit a written, signed request on official committee letterhead to the electronic filing office. Mail the request to: Federal Election Commission, Electronic Filing Office, 999 E St., NW, Washington, DC 20463.

How can I obtain FECFile 3?

Filers have two options for securing a copy of the FEC's free filing software. Note that FECFile 3 requires a PC with Windows 95, 98 or NT and approximately 8 MB free disk space.

- Download it directly from the FEC's web site. Go to <http://www.fec.gov> and click on the link "Electronic Filing at the FEC." From the menu selection, choose "Download," fill in the requested information and click "Submit" to have the form processed. Consult the instructions that follow on subsequent web pages to download the software to your hard drive.
- Call the FEC at 800/424-9530 and request to speak with the Electronic Filing Office. Someone there will see that a copy of the software is mailed to you.

Is FECFile 3 the only electronic filing option?

No. There are also commercial vendors that integrate electronic

filing capability into their software packages. Committees currently using software to produce paper FEC reports should check with the software vendor to see if electronic filing is available.

Shouldn't I wait until more committees are filing electronically?

More committees *are* filing electronically. As of this writing, 284 committees have filed 1,707 reports electronically. This is a 32 percent increase over the last six months. The system is fast, easy and reliable, and there is no time like the present to get started.

If I have additional questions about electronic filing, where can I get help?

- Committees with questions about electronic filing should call the FEC's electronic filing office at 202/694-1306 or 800/424-9530 (press 1 and ask for the electronic filing office), or send an e-mail to electronic@fec.gov. Information about electronic filing is also available at the FEC's web site—<http://www.fec.gov> (click on the link "Electronic Filing at the FEC").
- For technical questions about FECFile3, call the 24-hour support line at 818/889-2000.
- For technical questions about other filing software, call the software vendor for assistance. ♦

Federal Register

Federal Register notices are available from the FEC's Public Records Office.

Notice 1999-7

Definition of Express Advocacy; Notice of Disposition on Petition for Rulemaking (64 FR 27478, May 20, 1999)

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

800/424-9530
202/694-1100
202/501-3413 (FEC Faxline)
202/219-3336 (TDD for the
hearing impaired)
800/877-8339 (FIRS)

Scott E. Thomas, Chairman
Darryl R. Wold, Vice Chairman
Lee Ann Elliott, Commissioner
David M. Mason, Commissioner
Danny L. McDonald,
Commissioner
Karl J. Sandstrom, Commissioner
James A. Pehrkon, Staff Director
Lawrence M. Noble, General
Counsel

Published by the Information
Division
Louise D. Wides, Director
Angela Rucker, Editor
<http://www.fec.gov>

of, or in consultation with, or in concert with, or at the request or suggestion of, a candidate or any agent or authorized committee of such candidate" is now governed by the definition of coordination at 11 CFR 100.23 and no longer by the former paragraph at 11 CFR 109.1(b)(4). The Commission is also making conforming amendments to 11 CFR 110.14, which governs contributions to and expenditures by delegates and delegate committees.

Advisory Opinions Superseded

The Commission has in the past issued advisory opinions (AOs) that relied on a broader definition of coordination than that stated in the new rules. As a result, the following AOs are superseded to the extent that they are inconsistent with these new rules: AOs 1999-17, 1998-22, 1996-1, 1993-18, 1982-20, 1980-116 and 1979-80.

The full text of the final rules appears in the December 6, 2000, *Federal Register* at 65 FR 76138. This document is available from the FEC's Public Disclosure Office (call 800/424-9530, press 3), through FEC Faxline (dial 202/501-3413 and request document 246) and on the FEC's Web site at www.fec.gov (go to the Campaign Finance Law Resources link and then click on "Recent Federal Register Notices"). ♦

Back Issues of the Record Available on the Internet

This issue of the *Record* and all other issues of the *Record* starting with January 1996 are available through the Internet as PDF files. Visit the FEC's World Wide Web site at <http://www.fec.gov> and click on "What's New" for this issue. Click "Campaign Finance Law Resources" to see back issues.

Electronic Filing

Mandatory Electronic Filing Begins January 1, 2001

Mandatory electronic filing requirements became effective as of January 1, 2001. Accordingly, any committee that receives contributions or makes expenditures in excess of \$50,000 in the current calendar year, or that has reason to expect to do so,¹

¹ Once filers actually exceed the threshold, they have "reason to expect" to exceed the threshold in the following two calendar years. 11 CFR 104.18 (a)(3)(i). This means they must continue to file electronically for the two years (January through December) following the year in which they exceeded the threshold. Filers with no historic data on which to base their calculations should expect to exceed the threshold if they either receive contributions or make expenditures that exceed one-quarter of the threshold amount in the first quarter of the calendar year, or they receive contributions or make expenditures that exceed one-half of the threshold amount in the first half of the calendar year. 11 CFR 104.18 (a)(3)(ii). The regulations allow an exception to the requirement of filing for the following two calendar years for candidate committees:

- That have \$50,000 or less in net debts outstanding on January 1 of the year following the election;
- That anticipate terminating prior to the next election year; and
- Whose candidate has not qualified as a candidate for the next election and does not intend to become a candidate in the next election. 11 CFR 104.18 (a)(3)(i).

While all committees must file electronically in the year in which they exceed the threshold, authorized candidate committees meeting these requirements do not "expect to exceed the threshold" in the following two calendar years and, therefore, need not file electronically during those years unless they actually exceed the threshold.

must submit its reports electronically. The rules take effect for reporting periods beginning on or after January 1, 2001.² Any filers who are required to file electronically, but who file on paper, will be considered nonfilers and may be subject to enforcement action under the administrative fine program. The mandatory electronic filing provisions (11 CFR 104.18) apply to any political committee or other person required to file reports, statements and designations with the FEC. This includes all filers except Senate candidate committees (and other persons who support Senate candidates only), who file with the Secretary of the Senate.³

Application of the \$50,000 Threshold.

Each unauthorized committee (PAC or party committee) must file electronically if the total contributions or total expenditures of that committee exceed, or are expected to exceed, the \$50,000 threshold. The threshold is calculated on a per-committee basis, and each committee calculates its own contributions and expenditures separately and files separately, even if it is affiliated with another committee.

By contrast, all committees authorized by one candidate must file electronically if their combined total contributions or combined total expenditures exceed, or are expected to exceed, the threshold.

Individuals and qualified non-profit corporations whose independent expenditures exceed, or are expected to exceed, the \$50,000 threshold must also file electronically.

(continued on page 8)

² These regulations do not apply to the 2000 year-end report due January 31, 2001.

³ Senate candidates, however, are encouraged to voluntarily file an unofficial copy electronically with the FEC to ensure faster disclosure.

Electronic Filing

(continued from page 7)

Voluntary Electronic Filing.

Committees that are not required to file electronically are strongly encouraged to do so voluntarily. Once a committee begins to file its reports electronically, on a voluntary basis, it must continue to file electronically for the remainder of the calendar year unless the Commission determines that extraordinary and unforeseeable circumstances make continued electronic filing impractical. 11 CFR 104.18(b). No such waiver by the Commission, however, has been established for mandatory electronic filers.

Electronic filing software is available from the FEC at no cost to the filer. Many software companies that serve the filing community have included electronic filing in their software packages as well. To download the FEC software or to view a partial list of software vendors, go to www.fec.gov and click on the Electronic Filing icon. Or go to <http://www.fec.gov/electron.html>. ♦

Alternative Dispute Resolution

Frequently Asked Questions About ADR

Alternative Dispute Resolution (ADR) is a series of constructive and efficient procedures for resolving disputes through the mutual consent of the parties involved. Unlike the more formal procedures of the enforcement process, ADR encourages the parties to engage in negotiations that promptly lead to the resolution of their dispute.

In the course of processing cases through the ADR program, the ADR office has received a number of

inquiries, some of which are addressed below.

Q: How can a committee find out about the ADR option and whether its case might qualify for the program?

A: Campaign and party committees can learn about the ADR program through the FEC's brochure "Alternative Dispute Resolution Program," which describes how cases qualify for the program. The brochure is now available to the public on the FEC's Web site at www.fec.gov—go to the Campaign Finance Law Resources link and look under Publications. Individuals may also order the free brochure by mail by calling 800/424-9530 (press 1 and then 3) or 202/694-1100.

Q: What is the difference between negotiations and mediation as applied to the ADR program?

A: Negotiations at the FEC involve direct, bilateral discussions between the respondent (and/or their representative) and a representative of the FEC's ADR office. The negotiations are aimed at resolving the complaint. Mediation involves the same two parties, but with the addition of a neutral, impartial third party—the mediator—who assists the parties in resolving the complaint. The mediator does not have the authority to resolve the matter himself or herself, but works with the parties to facilitate their discussions and guide them in their negotiations.

Q: Is the mediator a member of the FEC staff?

A: No. The mediator is selected from a list of independent, nongovernmental, neutral mediators who work outside the Federal Election Commission.

Q: Are negotiations and mediation ever held simultaneously?

A: No. Mediation is initiated only if the negotiations between the parties are unsuccessful.

Q: Why is it necessary for the respondent to suspend the statute of limitations in order to participate in the ADR program?

A: Requiring the respondent to suspend the statute of limitations:

- Ensures that the respondent is committed to the program and a speedy resolution of the dispute;
- Protects the integrity of the Commission's regular enforcement program in the event the case needs to be returned to the Office of General Counsel (OGC) for final resolution; and
- Reminds the respondent that no benefit can be derived from delaying the resolution of the complaint.

Q: Will the complainant be involved in either the negotiations or mediation stage when the case is being processed by the ADR office?

A: No.

Q: What is the time frame for reaching an agreement during the FEC's negotiations or mediation processes?

A: The ADR office is committed to resolving issues within five months from the date the Commission concurs that the case should be processed by the ADR office.

Q: How will the schedule for negotiations be set?

A: The schedule for the negotiations and, if necessary, mediation will be set by mutual consent between the respondent and the representative of the FEC's ADR office.

Q: Will there be a "standard form" for the agreement once it is negotiated?

A: No. The agreement will be tailored to address the issues raised



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

*Electronic Filing**

On June 15, the Commission approved the final rules on mandatory electronic filing. Beginning with the reporting periods that start on or after January 1, 2001, all persons required to file their reports with the FEC who receive contributions or make expenditures in excess of \$50,000 in a calendar year, or who expect to do so, must submit their campaign finance reports electronically. Any filers who are required to file electronically, but who file on paper, will be considered nonfilers and may be subject to enforcement action.

The new rules, required by Public Law 106-58, provide faster disclosure of filed reports and streamline operations for both filers and the Commission. The Commission estimates, based on data from the 1996 and 1998 election cycles, that, with the \$50,000 threshold, 96 to 98 percent of all financial activity reported to the FEC will be available almost immediately on the FEC's Web site.

Mandatory v. Voluntary Filing

The mandatory electronic filing regulations (11 CFR 104.18) apply to any political committee or other person required to file reports, statements or designations with the FEC. This includes all filers except Senate candidate committees (and other persons who support only Senate candidates), who are required to file with the Secretary of the Senate.¹

Since 1996, the Commission has encouraged voluntary electronic filing. For those individuals and political committees that do not exceed (or do not expect to exceed) the \$50,000 threshold, voluntary electronic filing will still be encouraged.

Voluntary electronic filers must continue to file electronically for the remainder of the calendar year unless the Commission determines that unusual

circumstances make continued electronic filing impractical. 11 CFR 104.18(b). No such waiver by the Commission, however, has been established for mandatory electronic filers.

Who Must File Electronically

Candidate Committees. All committees authorized by one candidate must file electronically if their combined total contributions or combined total expenditures exceed, or are expected to exceed, the \$50,000 threshold.

PACs and Party Committees. By contrast, each unauthorized committee (PAC or party committee), whether or not it is affiliated, must file electronically if its total contributions or total expenditures exceed, or are expected to exceed, the threshold.

Joint Fundraising Representatives. A joint fundraising representative must file electronically if its total contributions or total expenditures exceed, or are expected to exceed, the \$50,000 threshold.²

Independent Expenditures. Individuals and qualified nonprofit corporations whose independent expenditures exceed, or are expected to exceed, the \$50,000 threshold must file electronically on FEC Form 5. Because Form 5 must be notarized, filers are required to submit a paper copy of Form 5 bearing the notarized seal and signature, or, if filing on diskette, attach a digital version of the seal and signature as a separate file when filing Form 5 electronically. 11 CFR 104.18(h) and 109.2(a).

Calculating the Threshold

A committee (other than a Senate committee) must file electronically if:

- It has received contributions of more than \$50,000 or made expenditures of more than \$50,000 during any calendar year; or

* This handout is based on an article that appeared in the August 2000 Record, p. 1.

¹ Senate candidates, however, are encouraged to voluntarily file electronically an unofficial copy of their reports with the FEC to ensure faster disclosure.

² For more information on joint fundraising, see 11 CFR 102.17 and the Campaign Guides for Congressional candidates and committees and for party committees.

- It has "reason to expect to exceed" the above threshold in any calendar year. 11 CFR 104.18(a)(1) and 104.18(a)(3)(i).

"Have Reason to Expect to Exceed." Once filers actually exceed the threshold, they have "reason to expect to exceed" the threshold in the following two calendar years. 11 CFR 104.18 (a)(3)(i). This means they must continue to file electronically for the next two years (January through December).

Exception for Candidate Committees. In some cases, a candidate committee that has exceeded the threshold and filed electronically may not have to continue filing electronically. This exception applies to a candidate committee that:

- Has \$50,000 or less in net debts outstanding on January 1 of the year following the election;
- Anticipates terminating prior to the next election year; and
- Supports a candidate who has not qualified for the next election and does not intend to become a candidate in the next election. 11 CFR 104.18 (a)(3)(i).

Persons With No History. New political committees or other persons with no history of campaign finance activity may rely on one of the following formulas to determine whether they will exceed, or should expect to exceed, the threshold:

- The filer receives contributions or makes expenditures that exceed one-quarter of the threshold amount in the first calendar quarter of the calendar year; or
- The filer receives contributions or makes expenditures that exceed one-half of the threshold amount in the first half of the calendar year. 11 CFR 104.18 (a)(3)(ii).

Other Considerations. When a committee calculates whether it has exceeded, or expects to exceed, the \$50,000 threshold, it should keep in mind the following:

- The calculation is based on either making \$50,000 in expenditures or receiving \$50,000 in contributions during the calendar year; it is not based on a combination of expenditures and contributions.
- Nonfederal funds are excluded from the calculation.
- Cash on hand and outstanding debt at the beginning of the calendar year are excluded from the calculation.

(Also, see chart on page 4: *Calculating the Electronic Filing Threshold.*)

Filing Reports and Statements

Validation of Report. Electronic filers (whether mandatory or voluntary) must file all their reports electronically. The reports must follow the FEC's Electronic Filing Specifications Requirements, available online or on paper from the FEC. 11 CFR 104.18(d). An electronic report is considered "filed" when it is received and validated by the Commission's computer system on or before 11:59 p.m. on the prescribed filing date. Incomplete or inaccurate reports that do not pass the FEC's validation program will not be considered filed. The Commission will notify the filer that the report has not been accepted. 11 CFR 104.18(e)(2).

Filing an Amendment. To amend an electronically filed report, the filer must electronically resubmit the entire report, not just the amended portions. Additionally, the amendments must comply with the formatting rules contained in the FEC's Electronic Filing Specifications Requirements. 11 CFR 104.18(f).

Registration Documents (FEC Forms 1 and 2)

If a committee has exceeded or expects to exceed the \$50,000 threshold, its Statement of Organization (FEC Form 1) and Statement of Candidacy (FEC Form 2), and any amendments to either form, must be filed electronically. 11 CFR 102.2(a)(2) and 104.18(c). Note that all filers (whether electronic or paper) must include on their Statement of Organization the URL for their Web site, if they maintain one. Those committees that file electronically must also include their e-mail address on their Statement of Organization. 11 CFR 102.2(a)(1)(vii).

Refiling Paper Reports

Filers will not be expected to refile any reports or statements that were correctly filed on paper earlier in the calendar year or election cycle. 11 CFR 104.18(a)(2).

Signature Requirements

A committee's treasurer (or other person responsible for filing designations with the FEC) must verify that all electronically filed documents have been examined by the treasurer and (to the best of that person's knowledge) are accurate and complete. Verification may be:

- Direct transmission of the filing, using the treasurer's personal password received from the FEC. (In order to receive a password, treasurers should call the electronic filing office at (202)208-5263); or
- If filing on diskette, a digitized copy of a signed certification sent, as a separate file on the diskette, with the electronically filed documents. 11 CFR 104.18(g).

Availability of Forms

FECFile software, available free from the FEC, currently generates FEC forms 3 and 3X for disclosure of financial information. The software will also generate forms 1 and 2.

Many commercially available software products also include electronic filing capabilities.

Nonfilers

Those filers who are required to file electronically and who file on paper instead, or who fail to file, will be considered nonfilers and may be subject to enforcement action by the Commission, including publication of their names and the imposition of civil money penalties under the new Administrative Fines Program.³ 11 CFR 104.18(a)(2) and Part 111, Subpart B and 2 U.S.C §437g(a)(4) and (6)(A).

More Information

Free copies of the final rules, and their Explanation and Justification, as they appeared in the Federal Register (65 FR 38415, June 21, 2000) are available through the FEC Faxline (202/501-3413, document 227). For further information, see the FEC's Web site at <http://www.fec.gov/electron.html>. ♦

³ See the July 2000 Record.

Calculating the Electronic Filing Threshold

Political committees should use the following formulas to determine if their total expenditures or total contributions are over \$50,000 per calendar year:

CANDIDATE COMMITTEES

- Total Contributions Received¹
Refunds of Contributions
- Total Contributions (if over \$50,000, must file electronically)**

- + Total Operating Expenditures
Contributions Made
- Total Expenditures (if over \$50,000, must file electronically)**

PACS

- Total Contributions Received
Refunds of Contributions
- + Transfers from affiliated federal committees
- Total Contributions (if over \$50,000, must file electronically)**

- + Total Federal Operating Expenditures
Transfers to affiliated federal committees
- + Contributions Made
- + Independent Expenditures
- Total Expenditures (if over \$50,000, must file electronically)**

POLITICAL PARTY COMMITTEES

- Total Contributions Received
Refunds of Contributions
- + Transfers from affiliated federal political party committees
- Total Contributions (if over \$50,000, must file electronically)**

- + Total Federal Operating Expenditures
Transfers to affiliated federal political party committees
- + Contributions Made
- + Independent Expenditures
- + Coordinated Expenditures
- Total Expenditures (if over \$50,000, must file electronically)**

¹ Including the outstanding balance of any loans made, guaranteed or endorsed by the candidate or other person.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

*Electronic Filing**

Under the Commission's mandatory electronic filing regulations, all persons required to file their reports with the FEC who receive contributions or make expenditures in excess of \$50,000 in a calendar year, or who expect to do so, must submit their campaign finance reports electronically. Any filers who are required to file electronically, but who file on paper, will be considered nonfilers and may be subject to enforcement action by the Commission, including publication of their names and the imposition of civil money penalties under the Administrative Fine Program. 11 CFR 104.18(a)(2) and Part 111, Subpart B and 2 U.S.C §437g(a)(4) and (6)(A).

Mandatory v. Voluntary Filing

The mandatory electronic filing regulations (11 CFR 104.18) apply to any political committee or other person required to file reports, statements or designations with the FEC. This includes all filers except Senate candidate committees (and other persons who support only Senate candidates), who are required to file with the Secretary of the Senate.¹

Since 1996, the Commission has encouraged voluntary electronic filing. For those individuals and political committees that do not exceed (or do not expect to exceed) the \$50,000 threshold, voluntary electronic filing is still encouraged.

Voluntary electronic filers must continue to file electronically for the remainder of the calendar year unless the Commission determines that unusual circumstances make continued electronic filing impractical. 11 CFR 104.18(b). No such waiver by the Commission, however, has been established for mandatory electronic filers.

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Calculating the Threshold

A committee (other than a Senate committee) must file electronically if:

- It has received contributions of more than \$50,000 or made expenditures of more than \$50,000 during any calendar year; or
- It has "reason to expect to exceed" the above threshold in any calendar year. 11 CFR 104.18(a)(1) and 104.18(a)(3)(i).

"Have Reason to Expect to Exceed." Once filers actually exceed the threshold, they have "reason to expect to exceed" the threshold in the following two calendar years. 11 CFR 104.18 (a)(3)(i). This means they must continue to file electronically for the next two years (January through December).

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- Anticipates terminating prior to the next election year; and
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(Also, see chart on page 3: *Calculating the Electronic Filing Threshold.*)

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- Direct transmission of the filing, using the treasurer's personal password received from the FEC. (In order to receive a password, treasurers should fax a request letter to the password office at 202/219-0674); or
- If filing on diskette, a digitized copy of a signed certification sent, as a separate file on the diskette, with the electronically filed documents. 11 CFR 104.18(g).

More Information

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Contributions Made
Total Expenditures (if over \$50,000, must file electronically)

PACS

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Refunds of Contributions
+ Transfers from affiliated federal committees
Total Contributions (if over \$50,000, must file electronically)
- + Total Federal Operating Expenditures
Transfers to affiliated federal committees
+ Contributions Made
+ Independent Expenditures
Total Expenditures (if over \$50,000, must file electronically)

POLITICAL PARTY COMMITTEES

- Total Contributions Received
Refunds of Contributions
+ Transfers from affiliated federal political party committees
Total Contributions (if over \$50,000, must file electronically)
- + Total Federal Operating Expenditures
Transfers to affiliated federal political party committees
+ Contributions Made
+ Independent Expenditures
+ Coordinated Expenditures
Total Expenditures (if over \$50,000, must file electronically)

¹ Including the outstanding balance of any loans made, guaranteed or endorsed by the candidate or other person.



Federal Election Commission

[Jump to another section of this site](#)



Mandatory Electronic Filing

Mandatory electronic filing in 2001!

In September, 1999 the President signed into law PL 106-58, which requires committees to file electronically if they exceed, *or have reason to expect to exceed* activity thresholds to be determined by the FEC. The FEC Mandatory Electronic Filing Regulation resulting from the law requires:

"political committees and other persons who are required to file with the agency must file electronically if they have, or have reason to expect to have, aggregate contributions or expenditures exceeding \$50,000 in a calendar year."

The first scheduled report to be filed under the Mandatory Electronic Filing regulation is the February 20, monthly report.

What does this mean for you? Read the text of the regulation and decide whether or not it would require you to file electronically in 2001. If the answer is yes, make certain you are prepared for electronic filing by following these simple steps.

- 1. Assess your computer hardware situation.** You will need a PC running Windows 95, 98, 2000 or NT. You will also need either a modem or a network connection to the internet in order to upload your files.
- 2. How about software?** You can download Free filing software from the FEC or use one of the commercial software products that support electronic filing.
- 3. You need a password to file electronically.** You can obtain a password for electronic filing at any time prior to the filing deadline. It is best not to wait until the last minute. Receiving a password does not obligate you to file electronically.

A significant increase in the number of electronic filers is expected in 2001 and the FEC electronic filing system is well prepared for the increased activity. However, there is no reason to wait until 2001 to begin filing electronically and there are many reasons to start as soon as possible.

You may already be using software that supports electronic filing. Contact your software vendor to find out. If not, check out this list of vendors who have incorporated electronic filing into their software or have indicated to the FEC that they are in the process of doing so. Or Download the Free FEC filing software.

Updated 09/19/2000



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
[FEC Privacy Policy](#) | [Viewing Requirements](#) | [Visually Impaired](#)

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Federal Election Commission

Electronic Filing Software

Requirements:

Electronic filing requires the use of special data formatting and upload procedures that can best be accomplished by software written specifically for this purpose. The software must be capable of creating a file in the proper format, validating and encrypting the file and uploading the file to the FEC.

Approval:

During the electronic filing process, the file is received and evaluated to verify that the it has been correctly formatted and that all necessary information is properly included. ***The FEC does not officially endorse or approve electronic filing software products.*** Any software package or other computer process that can produce and upload properly formatted files may be used for electronic filing.

Software options:

FECfile - Version 5 is currently available. This software was created by the FEC specifically for electronic filing of FEC reports. It is available at no cost to any committee who wishes to use it. It may be downloaded, or contact the Electronic Filing Office at 202-694-1642 option 2, to have a copy mailed to you. FECfile requires a PC with Windows 95, 98 or NT and approximately 8 MB free disk space.

The following companies have contacted the FEC and indicated that they are implementing electronic filing. The tools that facilitate doing so are available to anyone who wishes to use them. You should check with your software vendor to see if they support electronic filing with the FEC.

Company Name	Software Package	Phone Number
AmeriCan GOTV Enterprises, LLC	GOTV Campaign Optimizer	(866) 633-4688
Archaeotech, Inc.	FECReports	(571) 212-3377
Aristotle International Inc.	Campaign Manager; PAC Manager	(800) 296-2747
Aspen Software	Trail Blazer	(800) 446-1375



Federal Election Commission

☒ GO

Mandatory Electronic Filing

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Updated 1/5/2004



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(800) 424-9530 | In Washington (202) 694-1100
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26092584742

Irish American Democrats

RECEIVED
FEC MAIL ROOM

2001 AUG -1 P 3:21

To provide support to Democratic candidates who promote peace, justice, and prosperity in Ireland.

July 27, 2001

Mr. Scott Walker
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 F. Street NW
Washington D.C. 20463

Identification Number COO320432

Reference: Six Month report (01/01/01 - 06/30/01)

Dear Mr. Walker,

This letter is to request a waiver of the electronic filing requirement for the year 2001. The reasons for this request are as follows:

- 1) We do not anticipate that we will raise in excess of \$50,000 this year.
- 2) Irish American Democrats PAC uses only Macintosh computers, and the software is not available for us to file electronically, using a MAC.

Sincerely,



Irish American Democrats
PO Box 15638
Chevy Chase, MD 20825

Stella O'Leary
President/Treasurer

202-362-9064
fax 202-237-5141
Email: iridemis@erols.com
Internet: www.irishamericandemocrats.org

26092584743

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Revised 1/01)

Page 3

Write or Type Committee Name

IRISH AMERICAN DEMOCRATS

Report Covering the Period:

From:

01 01 2001

To:

06 30 2001

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)

(ii) Unitemized

(iii) TOTAL (add

Lines 11(a)(i) and (ii))

(b) Political Party Committees

(c) Other Political Committees
(such as PACs)

(d) Total Contributions (add Lines
11(a)(iii), (b), and (c)) (Carry
Totals to Line 32, page 4)

**12. Transfers From Affiliated/Other
Party Committees**

13. All Loans Received

14. Loan Repayments Received

**15. Offsets To Operating Expenditures
(Refunds, Rebates, etc.)**
(Carry Totals to Line 36, page 4)

**16. Refunds of Contributions Made
to Federal Candidates and Other
Political Committees**

**17. Other Federal Receipts
(Dividends, Interest, etc.)**

**18. Transfers from Nonfederal
Account for Joint Activity**

**19. Total Receipts (add Lines 11(d),
12, 13, 14, 15, 16, 17, and 18)**

**20. Total Federal Receipts
(subtract Line 18 from Line 19)**

1,200.00

310.00

1,510.00

0.00

0.00

1,510.00

0.00

0.00

0.00

0.00

0.00

0.00

0.00

0.00

609.96

2,119.96

1,510.00

1,510.00

0.00

0.00

1,510.00

0.00

0.00

0.00

0.00

0.00

0.00

0.00

0.00

609.96

2,119.96

1,510.00

26092584744

Page 4

COLUMN B
Calendar Year-to-Date

- [illegible]

	1	510.00
		0.00
	1	5100.00
		3149.81
		0.00
		3149.81

FEC
FORM 3XREPORT OF RECEIPTS
AND DISBURSEMENTS
For Other Than An Authorized CommitteeRECEIVED
FEC MAIL
OPERATIONS CENTER

JAN 20 2004 11:08

1. NAME OF
COMMITTEE (in full)

TYPE OR PRINT

Example: If typing, type
over the lines.

12FE4M5

IRISH AMERICAN DEMOCRATS

ADDRESS (number and street)

P.O. BOX 15638

Check if different
than previously
reported. (ACC)

CHEVY CHASE

MD

20825

2. FEC IDENTIFICATION NUMBER

CITY

STATE

ZIP CODE

C 00320432

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)

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 21 (YE)

(a) Quarterly Reports:

April 15
Quarterly Report (Q1)July 15
Quarterly Report (Q2)October 15
Quarterly Report (Q3)January 31
Year-End Report (YE)July 31 Mid-Year
Report (Non-Election
Year Only) (MY)Termination Report
(TER)(c) 12-Day
PRE-Election
Report for this:

Primary (12P)

Convention (12C)

General (12G)

Special (12S)

Runoff (12R)

Election on

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

General (30G)

Runoff (30R)

Special (30S)

Election on

in the
State of

5. Covering Period

03 01 2004

through

07 30 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

CATHERINE STELLA O'LEARY

Signature of Treasurer

Catherine S. O'Leary

Date

07 30 2004

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

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

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 02/2003)

Page 3

Write or Type Committee Name

IRISH AMERICAN DEMOCRATS

Report Covering the Period:

From:

07 01 2004

To:

09 30 2004

I. Receipts

COLUMN A
Total This PeriodCOLUMN B
Calendar Year-to-Date

11. Contributions (other than loans) From:

(a) Individuals/Persons Other

Than Political Committees

(i) Itemized (use Schedule A)

(ii) Unitemized

(iii) TOTAL (add

Lines 11(e)(i) and (ii))

(b) Political Party Committees

(c) Other Political Committees

(such as PACs)

(d) Total Contributions (add Lines

11(a)(i), (b), and (c)) (Carry

Totals to Line 33, page 5)

12. Transfers From Affiliated/Other

Party Committees

13. All Loans Received

14. Loan Repayments Received

15. Offsets To Operating Expenditures

(Refunds, Rebates, etc.)

(Carry Totals to Line 37, page 5)

16. Refunds of Contributions Made

to Federal Candidates and Other

Political Committees

17. Other Federal Receipts

(Dividends, Interest, etc.)

18. Transfers from Non-Federal and Levin Funds

(a) Non-Federal Account

(from Schedule H3)

(b) Levin Funds (from Schedule H5)

(c) Total Transfers (add 18(a) and 18(b))

19. Total Receipts (add Lines 11(d),

12, 13, 14, 15, 16, 17, and 18(c))

20. Total Federal Receipts

(subtract Line 18(c) from Line 19)

153,000.00

46,279.99

199,279.99

00.00

192,000.00

391,279.99

00.00

00.00

00.00

00.00

00.00

00.00

8,406.27

00.00

8,406.27

475,342.26

391,279.99

245,529.99

00.00

337,000.00

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660,292.26

576,229.99

Page 4

II. Displacements

COLUMN A
Total Time Period

COLUMN 8
Calendar Year-to-Date

21. Operating Expenditures:
 - (a) Allocated Federal/Non-Federal Activity (from Schedule H4)
 - (i) Federal Share
 - (ii) Non-Federal Share
 - (b) Other Federal Operating Expenditures
 - (c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))
22. Transfers to Affiliated/Other Party Committees
23. Contributions to Federal Candidates/Committees and Other Political Committees
24. Independent Expenditures (use Schedule E)
25. Coordinated Party Expenditures (2 U.S.C. §441e(c)) (use Schedule F)
26. Loan Repayments Made
27. Loans Made
28. Refunds of Contributions To:
 - (a) Individuals/Persons Other Than Political Committees
 - (b) Political Party Committees
 - (c) Other Political Committees (such as PACs)
 - (d) Total Contribution Refunds (add Lines 28(a), (b), and (c))
29. Other Disbursements
30. Federal Election Activity (2 U.S.C. §481(c))
 - (a) Allocated Federal Election Activity (from Schedule H5)
 - (i) Federal Share
 - (ii) "Levin" Share
 - (b) Federal Election Activity Paid Entirely with Federal Funds
 - (c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31)

[illegible]

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**Federal Election Commission
 ENVELOPE REPLACEMENT PAGE
 FOR INCOMING DOCUMENTS**

The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
Delivery Confirmation™ Label <input type="checkbox"/>	
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input checked="" type="checkbox"/> Overnight Delivery Service (Specify): <i>VPS</i>	Shipping Date <i>10/13/04</i>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
<i>✓</i> PREPARER (5/2004)	<i>10/13/04</i> DATE PREPARED

26092584749

Irish American Democrats

REGISTRATION CENTER

2004 OCT 25 A 10:13

To provide support to Democratic candidates who promote peace, justice, and prosperity in Ireland.

October 22, 2004

Ms. Dayna C. Brown
Reports Division
Federal Election Commission
999 E Street NW
Washington D.C. 20463

REF. C00320432

Dear Ms. Brown,

I am in receipt of your mailgram of October 20th, informing me that Irish American Democrats PAC is not in compliance because of failure to file electronically. As I explained in my two telephone conversations with you today, I understood that the FEC had granted Irish American Democrats an exception, based on a previous request to the Commission. That previously filed request, explained that the software is not available for Macintosh computers, which is what the PAC uses.

Following our two conversations today, I have purchased a PC and hired a software professional to begin entering the reports in question, in an electronic format, this weekend. I expect to have these reports filed with you early in the coming week.

In light of my understanding, that the PAC had been granted an exception because the software is still not available for Macintosh computers, I am requesting that you consider the paper filing as satisfying the filing requirement, until the electronic filing reaches you shortly.

Sincerely,



Irish American Democrats
PO Box 15638
Chicago, IL 60615-0638

Stella O'Leary
President/Treasurer

202-352-9064
fax 202-237-5143
Email: info@irishamericandemocrats.org

Let's make sure Irish Americans are heard.

26092584750

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 PRINTExample: If typing, type
over the lines

Irish American Democrats

ADDRESS (number and street)

PO Box 15535

Check if different
than previously
reported. (ACC)

Chevy Chase

MD

20625

2. FEC IDENTIFICATION NUMBER

CITY A

STATE A

ZIP CODE A

C00320432

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)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

2004

through

09

30

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

Catherine Stella O'Leary

Signature of Treasurer

Electronically Filed by Catherine Stella O'Leary

Date

10

28

2004

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

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

26092584751

DETAILED SUMMARY PAGE OF RECEIPTS

FEC Form 3X (Rev. 02/2003)

Page 3

Write or Type Committee Name
Irish American Democrats

Report Covering the Period: From: 07 01 2004 To: 09 30 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	15750.00	
(i) Itemized (use Schedule A)	4367.99	
(ii) Unitemized		
(iii) TOTAL (add Lines 11(a)(i) and (ii))	20117.99	24335.20
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs)	19200.00	33700.00
(d) Total Contributions (add Lines 11(a)(iii), (b) and (c)) (Carry Totals to Line 33, page 5)	39317.99	58035.20
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))	39317.99	58035.20
20. Total Federal Receipts (subtract Line 18(c) from Line 19)	39317.99	58035.20

26092584752



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

VIA OVERNIGHT DELIVERY AND FACSIMILE

January 31, 2006

Catherine Stella O'Leary, as Treasurer
Irish American Democrats
PO Box 15638
Chevy Chase, Maryland 20825

C00320432
AF# 1193

Dear Ms. O'Leary:

On December 6, 2004, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Irish American Democrats and you, as Treasurer ("respondents"), violated 2 U.S.C. § 434(a) for failing to file in a timely manner the 2004 October Quarterly Report, an election sensitive report. The Commission also made a preliminary determination that the civil money penalty was \$1,425 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,

Shawn Woodhead Werth
Shawn Woodhead Werth
Reviewing Officer
Office of Administrative Review

cc: Ms. Erin O'Malley
Attachment

26092584753



RECEIVED
FEC MAIL
OPERATIONS CENTER

2006 FEB -6 P 1:04

To provide support to Democratic candidates who promote peace, justice, and prosperity in Ireland.

VIA FACSIMILE AND HAND DELIVERY

February 5, 2006

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

Re: C00320432 AF #1193

Dear Secretary,

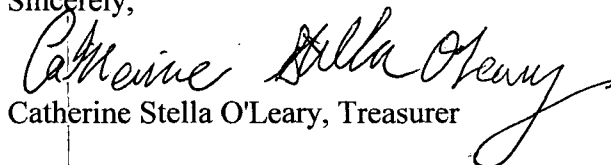
On January 31, 2006 I received a letter from Shawn Werth, Reviewing Officer, Office of Administrative Review. Ms. Werth included a copy of the Reviewing Officer's Recommendation as an attachment.

I agree with the conclusions of the Reviewing Officer as stated on Page 9 of the Recommendation that:

1. The (FEC) decision to not develop software for Macintosh users was not made clear to filers during this period.
2. When the respondents (Irish American Democrats) called the EFO for help to electronically file the report, they were not offered the option of a Windows emulator as a possible solution to electronically file their report.
3. The Reviewing Officer believes that if they (Irish American Democrats) had been offered this solution they may have been able to use their existing Macintosh computer to electronically file the October Quarterly Report rather than having to buy a new computer with a Windows operating system and hiring a consultant.

The conclusion of the Reviewing Officer-that in light of the facts, the Commission take no further action and close the file in this matter- seems reasonable and fair and I trust that the Commissioners will agree.

Sincerely,


Catherine Stella O'Leary, Treasurer

Irish American Democrats
PO Box 15638
Chevy Chase, MD 20825

Stella O'Leary
President/Treasurer

202-362-9064
fax 202-237-5141
Email: irldems@erols.com
Internet: www.irishamericandemocrats.org

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT
2006 FEB -6 P 4:09

26092584754



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 10, 2006

SENSITIVE

2006 FEB 10 P 12:55

FEDERAL ELECTION
COMMISSION
SECRETARIAT

MEMORANDUM

TO: THE COMMISSION

THROUGH: ROBERT J. COSTA *RC*
ACTING STAFF DIRECTOR

ANTHONY P. SCARDINO *APS*
DEPUTY STAFF DIRECTOR

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

SUBJECT: FINAL DETERMINATION RECOMMENDATION IN AF# 1193
- IRISH AMERICAN DEMOCRATS AND CATHERINE
STELLA O'LEARY, AS TREASURER (C00320432)

On December 6, 2004, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that the Irish American Democrats and Catherine Stella O'Leary, as Treasurer ("the respondents"), violated 2 U.S.C. § 434(a) for failing to file in a timely manner the 2004 October Quarterly Report, an election sensitive report. The report was filed on October 28, 2004, 13 days late. As a result, on December 6, 2004, the Commission also made a preliminary determination that the civil money penalty was \$1,425 based on the schedule of penalties at 11 C.F.R. § 111.43.

On January 13, 2005, the Commission received the respondents' written response, in the form of an affidavit, and supporting documentation ("challenge"). After reviewing the challenge, the Reviewing Officer's recommendation dated January 27, 2006, was forwarded to the Commission. A copy was simultaneously forwarded to the respondents. According to the information provided in the challenge, Commission records, the Reports Analysis Division telecons, the Electronic Filing Office logs, and the Information Technology Division Manager's supplemental response, the respondents knew in July 2001 that they had to electronically file reports if and when they exceeded the \$50,000 mandatory electronic filing threshold, and that electronic filing software was not available for Macintosh computers. They believed that their waiver request was granted but there is no indication that the Commission told them that it was approved. Nonetheless, over the next three years, they continued to check each reporting period to see if software for

Macintosh users was available. Each time, they found it was not, so they sent each report (including the 2004 October Quarterly Report) on paper. While the decision to not develop this software had already been made, the ITD Manager says that this decision was not included on the Commission's website and in the User Manuals. In addition, when asked by Macintosh users who called for assistance, the EFO staff suggested the use of a Windows emulator as one possible solution to electronically filing a report on a Macintosh computer.

The Reviewing Officer believes that the respondents had sufficient notice and opportunity to take the steps necessary to file the 2004 October Quarterly Report on time and electronically once they crossed the \$50,000 threshold. The Reviewing Officer recognizes, however, that the decision to not develop software for Macintosh users was not made clear to filers during this period. Furthermore, when the respondents called the EFO for help to electronically file the report, they were not offered the option of a Windows emulator as a possible solution to electronically file their report. The Reviewing Officer believes that had they been offered this solution, they may have been able to use their existing Macintosh computer to electronically file the October Quarterly Report rather than having to buy a new computer with a Windows operating system and hiring a consultant. The Reviewing Officer, therefore, recommends that the Commission take no further action and close the file in this matter.

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). The respondents' written response was received via facsimile and hand delivery on February 6, 2006, and is attached for your review.

OAR Recommendations

- (1) Take no further action in AF# 1193 that the Irish American Democrats and Catherine Stella O'Leary, as Treasurer, violated 2 U.S.C. § 434(a) and close the file; and
- (2) Send the appropriate letter.

Attachment

26092584756

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Final Determination Recommendation in) AF #1193
Irish American Democrats and Catherine)
Stella O'Leary, as Treasurer (C00320432))

CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby
certify that on February 15, 2006, the Commission decided by a vote of 6-0 to take
the following actions in AF #1193:

1. Take no further action in AF #1193 that the Irish American Democrats and Catherine Stella O'Leary, as Treasurer, violated 2 U.S.C. § 434(a) and close the file.
2. Send the appropriate letter.

Commissioners Lenhard, Mason, Toner, von Spakovsky, Walther, and
Weintraub voted affirmatively for the decision.

Attest:

February 15, 2006
Date

Mary W. Dove
Mary W. Dove
Secretary of the Commission

26092584757



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 22, 2006

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Catherine Stella O'Leary, as Treasurer
Irish American Democrats
P.O. Box 15638
Chevy Chase, Maryland 20825

ID# C00320432
AF# 1193

Dear Ms. O'Leary:

On December 6, 2004, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that the Irish American Democrats and you, as Treasurer ("the respondents"), violated 2 U.S.C. § 434(a) for failing to file in a timely manner the 2004 October Quarterly Report, an election sensitive report. By letter dated December 7, 2004, the Commission sent you notification of the RTB finding that included a civil money penalty calculated at RTB of \$1,425 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On January 13, 2005, the Office of Administrative Review received your written response, in the form of an affidavit, and supporting documentation ("challenge") challenging the RTB finding and civil money penalty calculated at RTB.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and the written response with its supporting documentation. Based on this review, the Reviewing Officer recommended that the Commission take no further action against the Irish American Democrats and you, as Treasurer, with respect to 2 U.S.C. § 434(a). The Commission's decision to not develop software for Macintosh users was not made clear to filers during the period from July 2001 (when the respondents submitted a waiver request) and October 2004 (when they were required to electronically file the October Quarterly Report), and, when they called the EFO for help to electronically file it, they were not offered the option of a Windows emulator as a possible solution to electronically file the report. The Reviewing Officer believed that had they been offered this solution, they may have been able to use their existing Macintosh computer to electronically file the report rather than having to buy a new computer with a Windows operating system and hiring a consultant. The basis for the Reviewing Officer's recommendation was included in the Final Determination Report, a copy of which was sent to you on January 31, 2006.

On February 16, 2006, the Commission adopted the Reviewing Officer's recommendation to take no further action against the Irish American Democrats and you, as Treasurer, with respect to 2 U.S.C. § 434(a).

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 C.F.R. § 111.42(b). Although the file must be placed on the public record within 30 days from the date of the Commission's notification, this could occur at any time following certification of the Commission's vote.

If you have any questions regarding this matter, please contact Shawn Woodhead Werth on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

Sincerely,



Michael E. Toner
Chairman



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 1193

DATE SCANNED

4/26/06

SCANNER NO.

2

SCAN OPERATOR

SES

26092584760