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Certified Public Accountants

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WASHINGTON, DC 20005-1831  
Telephone 202 223-2880 Facsimile 202 223-3241

C. HAYES &amp; COMPANY

MON SEP 21 A 9:47

September 15, 2004

Brandy Phillips  
Senior Campaign Finance Analyst  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Dear Ms. Phillips:

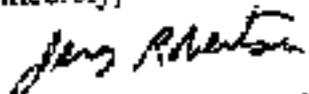
Our client, United Association Political Education Committee (UAPEC), has instructed us to reply to your notice dated August 25, 2004. We have enclosed a copy of that notice for your convenience.

The following actions have been taken by the UAPEC in response to your notice:

1. The UAPEC has requested a \$250 refund from Friends of Bill Gluba. A copy of that request is attached.
2. The \$1,000 excess contribution to Jim Davis for Congress has been redesignated to the 2004 General Election. Notice to the Davis campaign is attached.
3. The \$1,500 check payable to the DNC was never cashed. That payment was voided and has been reported as a void in the September 20<sup>th</sup> monthly report.

Please adjust your records to reflect the above information. If you should have any further questions, please do not hesitate to contact me.

Sincerely,

  
Jerome J. Robertson, CPA

RQ-2

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20467

August 25, 2004

Martin J. Maddaloni, Treasurer  
United Association Political Education Committee  
901 Massachusetts Avenue NW  
Washington, DC 20001Response Due Date:  
September 24, 2004

Identification Number: C00012476

Reference: July Monthly Report (6/1/04 - 6/30/04)

Dear Mr. Maddaloni:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. An adequate response must be received at the Commission by the response date noted above. An itemization of the information needed follows:

-Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent

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to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a national political party in excess of \$15,000 in a calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an excessive contribution, you must notify the recipient and request a refund of the amount in excess of \$15,000. The refund of the excessive amount must be made within sixty (60) days of receipt of the contribution.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

Although the Commission may take further legal action concerning the excessive contribution(s), prompt action in obtaining a refund will be taken into consideration.

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

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Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1157.

Sincerely,



Brandy Phillips  
Senior Campaign Finance Analyst  
Reports Analysis Division

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Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
Friends of Bill Cluba	10/9/03	\$250	G-2004	2003 Year End	Plumbers & Pipefitters Local Union #25 Federal PAC
Friends of Bill Cluba	6/29/04	\$5,000	G-2004	2004 July Monthly	
Jim Davis for Congress	9/4/03	\$1,000	P-2004	2003 October Monthly	
Jim Davis for Congress	3/16/04	\$2,500	P-2004	2004 April Monthly	
Jim Davis for Congress	6/29/04	\$2,500	P-2004	2004 July Monthly	
DNC Services Corporation/Democratic National Committee	3/24/04	\$15,000	NA	2004 April Monthly	
DNC Services Corporation/Democratic National Committee	6/29/04	\$1,500	NA	2004 July Monthly	



**UNITED ASSOCIATION**  
of Journeymen and Apprentices of the  
Plumbing and Pipe Fitting Industry of  
the United States and Canada

Founded 1889

General Office File Reference: **LLM**Martin J. Madaloni  
General PresidentThomas H. Mitchell  
General Secretary-TreasurerWilliam D. Ellis  
General Counsel

September 1, 2004

Jim Davis for Congress  
3315 Henderson Blvd., Suite 100  
Tampa, FL 33609

Gentlemen:

Please be advised that the United Association of Plumbers and Pipe Fitters issued a check for \$5,000.00 to Jim Davis for Congress on June 29, 2004 for his Primary Campaign. We received a letter from the Federal Election Commission stating that Mr. Davis is \$1000.00 over his limited contribution, so at this time we are re-designating \$1000.00 to your General Campaign.

If you have any questions, please contact Luckie McClintock, Director of Political and Legislative Affairs at 202-628-5823.

Sincerely yours,

Martin J. Madaloni  
General President

MJM:pab

LLJA

September 1, 2004

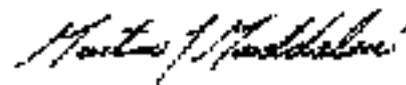
Bill Gluba for Congress  
PO Box 2205  
Davenport, IA 52809

Gentlemen:

Please be advised that the United Association of Plumbers and Pipe Fitters is requesting a refund check in the amount of \$250.00, as we were just informed by the Federal Election Commission that Mr. Bill Gluba has received \$250.00 over his limited contributions. Sorry for the inconvenience that this may have caused.

If you have any questions, please contact Luckie McClintock, Director of Political and Legislative Affairs at (202) 628-5823.

Sincerely yours,



Martin J. Maddaloni  
General President

MJM:pab

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 checked="" type="checkbox"/> USPS First Class Mail	Postmarked 9-17-04
<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 type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
<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>jer</i> PREPARER	9-21-04 DATE PREPARED