



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

September 15, 2006

William P. Hite, Treasurer  
United Association Political  
Education Committee  
901 Massachusetts Avenue, NW  
Washington, DC 20001-4307

**Response Due Date:**  
**October 16, 2006**

Identification Number: C00012476

Reference: August Monthly Report (7/1/06-7/31/06)

Dear Mr. Hite:

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:

-The Commission notes the redesignation and/or reattribution of several contributions. Please amend your report to disclose the proper format for redesignations and/or reattributions. The first entry must disclose, as a memo entry, the information for the contribution as it was originally reported; the second entry must disclose, as a memo entry, the information as it has been redesignated or reattributed, including the date the redesignation or reattribution documentation was made/received by the committee (11 CFR §104.8(d)(2), (3), and (4)) The Committee should also provide the Commission with a copy of the signed documentation. See the attached sample of properly reported redesignations.

-Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the 2006 Primary election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with

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clarifying information. If the contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund 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.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation 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. 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 this impermissible activity, 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 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.

**Please note, 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.

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) 694-1141.

Sincerely,



Daniel T. Buckley  
Campaign Finance Analyst  
Reports Analysis Division

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Contributions After Election Date

Recipient Name	Date	Amount	Election	Election State - Date
KATHERINE FOX CARR	07/07/2006	\$250.00	P2006	IN - 05/02/2006

Excessive Contributions to a Candidate

Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
MARIA CANTWELL	6/27/06	\$5,000	P2006	2006 July Monthly Report	N/A
MARIA CANTWELL	7/14/06	\$5,000	P2006	2006 August Monthly Report	N/A
Hillary Clinton for U.S. Senate	10/17/03	\$2,500	P2006*	2003 November Monthly Report	N/A
HILLARY RODHAM CLINTON	7/25/06	\$5,000	P2006	2006 August Monthly Report	N/A
MS. BETTY S SUTTON	6/9/06	\$5,000	G2006	2006 July Monthly Report	N/A
MS. BETTY S SUTTON	7/25/06	\$5,000	G2006	2006 August Monthly Report	N/A
JOHN M SPRATT, JR	6/19/06	\$5,000	G2006	2006 July Monthly Report	N/A
JOHN M SPRATT, JR	7/25/06	\$4,000	G2006	2006 August Monthly Report	N/A
DON PAYNE FOR CONGRESS	2/23/06	\$4,000	G2006	2006 Amended April Quarterly Report	Steamfitters Local 475 PAC (C00252395)
DONALD M PAYNE	7/12/06	\$2,500	G2006	2006 August Monthly Report	N/A

\*Schedule B of your report discloses this contribution as designated to the 2004 Primary election; however, this candidate did not participate in a Primary election in 2004. Therefore, this contribution has been attributed to the next scheduled Federal election for this candidate, the 2006 Primary.

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# REDESIGNATION ORIGINAL DESIGNATION: YEAR-END REPORT

<b>SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS</b>		Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one) <input type="checkbox"/> 21b <input type="checkbox"/> 22 <input checked="" type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 26 <input type="checkbox"/> 26 <input type="checkbox"/> 27 <input type="checkbox"/> 28a <input type="checkbox"/> 28b <input type="checkbox"/> 28c <input type="checkbox"/> 28	PAGE 1 OF 1
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) Stoics Incorporated PAC				
Full Name (Last, First, Middle Initial)				
A. Committee to Reelect Mark Aurelius		Date of Disbursement MM / DD / YYYY 12 / 30 / 2001		
Mailing Address 212 Via Sacra Road		Amount of Each Disbursement this Period 5000.00		
City: Rome State: NY Zip Code: 00000		Purpose of Disbursement Contribution		
Candidate Name Mark Aurelius		Category Type 011		
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		
State: NY District: 23				

## Resignations of Contributions

Use *memo entries* to show any redesignations of contributions.

If a contribution to a candidate is redesignated after the close of books, show the redesignation on the next report and indicate the report on which the original contribution was itemized.

In this illustration, the committee originally made a \$5,000 contribution to a candidate's campaign, intending it to count toward the primary election. The committee itemized the contribution in its year-end report. The following month, the campaign requested that the SSF redesignate \$4,500 to help retire debts from the previous general election campaign. The committee itemized the redesignation in its April quarterly report.

## Return or Refund of Contributions Made

If an SSF receives a refund of a *contribution* it has made, it must report the refund in one of two ways, depending on the circumstances described below.

### Contribution Made by SSF: Original Check Not Deposited

If a check to a *candidate committee* or other *political committee* is not deposited (e.g., if it is *returned* uncashed or is lost), report the amount as a *negative entry* on a Schedule B for Line 23, "Contributions to Federal Candidates and Other Political Committees." (The amount is subtracted from the total for Line 23.) An example is illustrated at right.

### Refunded by Recipient's Check

If the recipient committee deposits the contribution and then refunds it with its own check, itemize the refund, regardless of amount, on a Schedule A for Line 16, "Contribution Refunds."

### Refunds Made by the SSF

When an SSF refunds a contribution to a donor, the committee must include the disbursement in the total for the appropriate category of refund on the Detailed Summary Page (Line 28(a), (b) or (c)). If the SSF previously itemized the incoming contribution on Schedule A, then it must itemize the refund on a Schedule B for the appropriate line number. 104.8(d)(4).

(An SSF may return a contribution to the donor without depositing it, although the return must be made within 10 days of the treasurer's receipt of the contribution. 103.3(a). In this case, the committee does not have to report either the receipt or the return of the contribution.)

# REDESIGNATION: APRIL REPORT

<b>SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS</b>		Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one) <input type="checkbox"/> 21b <input type="checkbox"/> 22 <input checked="" type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 26 <input type="checkbox"/> 26 <input type="checkbox"/> 27 <input type="checkbox"/> 28a <input type="checkbox"/> 28b <input type="checkbox"/> 28c <input type="checkbox"/> 28	PAGE 1 OF 1
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) Stoics Incorporated PAC				
Full Name (Last, First, Middle Initial)				
A. Committee to Reelect Mark Aurelius		Date of Disbursement MM / DD / YYYY 12 / 30 / 2001		
Mailing Address 212 Via Sacra Road		Amount of Each Disbursement this Period 5000.00		
City: Rome State: NY Zip Code: 00000		Purpose of Disbursement Contribution		
Candidate Name Mark Aurelius		Category Type 011		
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		
State: NY District: 23		MEMO <sup>a</sup> (As disclosed in 2001 year-end) <sup>b</sup>		
Full Name (Last, First, Middle Initial)				
B. Committee to Reelect Mark Aurelius		Date of Disbursement MM / DD / YYYY 02 / 28 / 2002		
Mailing Address 212 Via Sacra Road		Amount of Each Disbursement this Period 4500.00		
City: Rome State: NY Zip Code: 00000		Purpose of Disbursement Contribution		
Candidate Name Mark Aurelius		Category Type 011		
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) ▼		
State: NY District: 23		2000 General debt		

<sup>a</sup>When using FECfile, this is entered automatically by checking the memo dialog box.

<sup>b</sup>When using FECfile on Schedule B, this information is entered using "memo text." See page 43.

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