

Since 1911

There is No Substitute for Quality



Pipe Fitters' Local Union No. 522

HEATING • AIR CONDITIONING • REFRIGERATION • PROCESS PIPING

1317 BERRY BLVD. • LOUISVILLE, KENTUCKY 40215



Phone:
361-8492
Fax:
366-8459

October 6, 1997

Andrew J. Dodson
Senior Report Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Reference: Pipefitters Local 522 Political Action Fund
Your letter of September 22, 1997

Dear Mr. Dodson:

In order to be in compliance with the Act, please be advised that the recipient committee (the United Association Political Education Committee) has been directed to transfer the funds received from the Pipefitters Local 522 Political Action Committee to an account not used to influence federal elections. We have been advised that this transfer is being implemented.

It was the intent of the Pipefitters Local 522 Political Action Committee that such funds be transferred to an account not used to influence federal elections. Apparently, we did not provide sufficient instructions to make that intent clear, and we regret this inadvertence.

A copy of this letter of compliance with your September 22, 1997 notification is being concurrently sent to the United Association Political Education Committee, to confirm our directions.

Sincerely,

Dale A. Lafferre
Business Manager

cc: United Association Political Education Committee

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM
OCT 9 1 17 PM '97



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SEP 22 1997

Treasurer
Pipefitters Local No. 522
Political Action Fund
1317 Berry Boulevard
Louisville, KY 40215

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees which may be subject to the registration and reporting requirements of the Federal Election Campaign Act ("the Act") but are not registered with the Commission.

The Act defines a "political committee" to include any separate segregated fund established by a corporation, labor organization, membership organization (to include trade associations), cooperative, or corporation without capital stock which solicits contributions or makes expenditures for the purpose of influencing federal elections. 2 U.S.C. §§431(4) and 441b. The term "expenditure" includes contributions to political committees supporting federal candidates. 2 U.S.C. §431(9).

In addition, the Act precludes a political committee from making a contribution to any other political committee which exceeds \$5,000 in a calendar year. 2 U.S.C. §§441a(a)(1)(C) and (2)(C)

A review of the receipts reported by the United Association Political Education Committee indicates that your organization may have made an excessive contribution to a political committee during the calendar year 1997. This activity may qualify your organization as a "political committee" subject to the registration, reporting and other requirements of the Act. A copy of the receipt schedule(s) which list your organization's contribution(s) is enclosed for your review.

In order to be in compliance with the Act, your organization must either:

- 1) submit a Statement of Organization, file disclosure reports on FEC FORM 3X, and obtain a contribution refund of the amount in excess of the limitations (relevant informational materials and forms are enclosed); or

- 2) receive a full contribution refund or direct the recipient committee(s) to transfer the funds to an account not used to influence federal elections.

The second alternative noted above should be followed if your organization does not wish to register and file disclosure reports, or if the contributions or expenditures by your organization were from an account containing corporate or union funds.

If you believe that your organization is not a political committee, has not made excessive contributions to a federal candidate, or the Commission is otherwise in error, please submit documentation which will clarify this matter. Although the Commission may take further legal steps concerning this matter, your prompt action will be taken into consideration.

Please notify the Commission within fifteen (15) days from the date of this letter of your decision on this matter. If you have any questions, please contact me on the agency's toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Andrew J. Dodson
Senior Reports Analyst
Reports Analysis Division

219

Enclosures

