



## Mulligan & Grote, CPA, P.C.

131 Tully Avenue, Floral Park, New York 11001 • (516) 354-2205 • Fax (516) 354-2207

February 26, 2005

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

Attn: Brandis J. Zehr

Re: Enterprise Association of Steamfitters  
Local 638 PAC  
30-Day Post General Report (10/14/04-11/22/04)

Dear Mr. Zehr:

We are the accountant's for the above named PAC and have received your letter dated February 11, 2005, a copy of which is enclosed.

We are preparing an amended report, which will address the questions raised in your letter. The United Association is an affiliate and the payment was reported on the wrong line. This will be corrected on the amended FEC-3X. The name of the organization will also be corrected on the amended FEC-3X.

The amended return will be filed during the week of February 28<sup>th</sup>.

If you require farther information, please feel free to contact me at the above number.

Sincerely,

David K. Grote CPA

2005 MAR - 7 A 10 15  
FEDERAL ELECTION COMMISSION



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 11, 2005

RECEIVED  
FEDERAL  
ELECTION  
COMMISSION  
REGISTRATION CENTER  
RQ-2

2005 MAR -7 A 10:15

Patrick E. Dolan, Treasurer  
Enterprise Association of Steamfitters  
Local 638 Political Action Committee  
32-32 48th Avenue  
Long Island City, NY 11101

Response Due Date:  
March 14, 2005

Identification Number: C00386821

Reference: 30 Day Post-General Report (10/14/04 - 11/22/04)

Dear Mr. Dolan:

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 a contribution to "United Association Federal Political Education Fund" which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a committee from making contributions to another political committee in excess of \$5,000 per calendar year. Records at the Commission, however, indicate that your committee may actually be affiliated with "United Association Federal Political Education Fund." As provided for in 11 CFR §102.5(g)(2), affiliated committees are those political committees established, financed, maintained, or controlled by the same group of persons including any parent, subsidiary, branch, division, department, or local unit thereof. Affiliated political committees may make and receive unlimited transfers amongst themselves which are not considered to be contributions 11 CFR §102.5(a)

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

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If you have made an excessive contribution, you must notify the recipient and request a refund of the amount in excess of \$5,000. 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 your refund request sent to the recipient. In addition, any refund should be disclosed on Schedule A supporting Line 16 of the report covering the period during which the refund occurs.

If, on the other hand, "United Association Federal Political Education Fund" is affiliated with your committee, please clarify this relationship in writing and amend Line 6 of your Statement of Organization to identify it as an affiliated committee. 11 CFR §102.2 For future reporting, be aware that transfers made to affiliated committees should properly be disclosed on Schedule B supporting Line 22 of the Detailed Summary Page.

Although the Commission may take further legal action concerning the excessive contribution, your prompt action in obtaining a refund of the excessive amount, or further clarification of your relationship, if any, with "United Association Federal Political Education Fund" will be taken into consideration.

Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions to federal candidates and committees should be properly disclosed on a separate Schedule B, supporting Line 23 of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing.

Commission records indicate the name of your political committee as "Enterprise Association of Steamfitters Local 638 Political Action Committee." However, your committee filed this report(s) in the name of "Enterprise Association Local 638 Political Action Committee." While committees may use commonly recognized abbreviations on daily communications such as letterhead and committee checks, disclosure reports, amendments and other committee filings must reflect the official name of the connected organization, as well as any abbreviation within its title. 2 U.S.C. §432(e)(5). Please amend your report(s) to clarify this discrepancy.

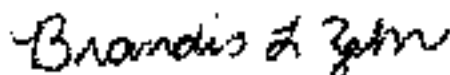
ENTERPRISE ASSOCIATION OF STEAMFITTERS LOCAL 638 PAC

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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.

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) 694-1148.

Sincerely,



Brandis L. Zehr  
Campaign Finance Analyst  
Reports Analysis Division

ENTERPRISE ASSOCIATION OF STEAMFITTERS LOCAL 638 PAC

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Recipient Name	Date	Amount	Report
United Association Federal Political Education Fund	11/10/04	\$20,000	2004 30 Day Post-General

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 3/2/05
<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>Es</i> PREPARER (5/2004)	3/7/05 DATE PREPARED