



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

JAN 14 1998

William Luddy, Treasurer  
Carpenters Legislative  
Improvement Committee  
101 Constitution Ave., NW  
Washington, DC 20001

Identification Number: C00001016

Reference: December Monthly Report (11/1/97-11/30/97)

Dear Mr. Luddy:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report discloses a contribution(s) from an organization which is not a political committee registered with the Commission (pertinent portion(s) attached). In addition, the contribution appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) precludes a political committee from receiving contributions from a person or another committee in excess of \$5,000 in a calendar year. Also, in order to make contributions to your committee, organizations which are not political committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution. 11 CFR §102.5(b)

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of 2 U.S.C. §§441a(f) and 441b. If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR §102.5(a).

In order to be in compliance with the Act, your committee must: 1) refund to the donor, or transfer-out to a non-federal account, the amount in excess of \$5,000 and 2) determine the extent to which your committee received funds that are not permissible, and refund or transfer-out the prohibited funds.

If you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the funds, the Commission will presume the funds were impermissible, absent a statement from your committee to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which they are made.

Although the Commission may take further legal action concerning the acceptance of prohibited and excessive contribution(s), your prompt refund or transfer-out will be taken into consideration.

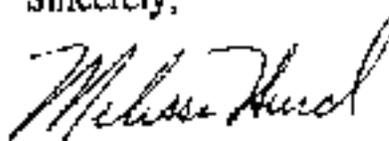
-Please amend Schedule B supporting Line 23 by providing the purpose for each in-kind contribution made to a federal candidate or political committee. 11 CFR §104.3(b)(3)(ii) and (v)

-For future reporting, please be advised that only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 29.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days

of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

A handwritten signature in cursive script that reads "Melissa Hurd".

Melissa Hurd  
Reports Analyst  
Reports Analysis Division

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page	PAGE	OF
	23	121
FOR LINE NUMBER		11(a)(i)

**Contributions From Individuals (Itemized)**

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)**  
 Carpenters Legislative Improvement Committee United Brotherhood of Carpenters and Joiners of America CIR01016

Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Stephen C Cunningham Rr 4 Box 99 Nashville, IN 47448	Local Union 1775	11/26/97	\$44.68
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Recording Secretary Aggregate Year-to-Date > \$ 453.44		
Emsley W Curtis 88945 Bridge St Springfield, OR 97478	Pacific Northwest DC	11/14/97	\$49.50
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Business Representative Aggregate Year-to-Date > \$ 466.56		
James C Czaja 6648 174th Pl Tinley Park, IL 60477	Local Union 0578	11/17/97	\$56.98
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Bus. Manager/Rep Aggregate Year-to-Date > \$ 538.44		
DC Central Indiana 2635 Madison Ave Indianapolis, IN 46225-2110	DC Central Indiana	11/17/97 11/26/97 11/26/97 11/26/97	\$16,000.00 \$24.00 \$27.00 \$32.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date > \$ 36,247.00		
Neil Louis Daley 2551 Warners Rd Warners, NY 13164	United Brotherhood of Carpenters	11/17/97	\$28.85
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Representative Aggregate Year-to-Date > \$ 570.05		
Paul R Dalferto 3322 Maple Ave Castalia, OH 44824	Northeast Ohio DC	11/13/97	\$50.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Business Representative Aggregate Year-to-Date > \$ 480.00		
James C Dalluge 904 E Lake Shore Dr Decatur, IL 62521	Mid-Central Illinois DC	11/14/97	\$48.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Recording Secretary Aggregate Year-to-Date > \$ 576.00		

<b>SUBTOTAL</b> of Receipts This Page (optional)	<b>\$ 16,360.85</b>
<b>TOTAL</b> This Period (last page this line number only)	

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**ITEMIZED RECEIPTS**

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**NAME OF COMMITTEE (in Full)**  
 Carpenters Legislative Improvement Committee United Brotherhood of Carpenters and Joiners of America C0001016

Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
LU 0060 531 East Market Street Indianapolis, IN 46204	LU 0060	11/26/97	\$29.00
		11/26/97	\$33.00
	Occupation	11/26/97	\$35.00
	Aggregate Year-to-Date	11/26/97	\$36.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
LU 0066 112 S. Third Street Orlean, NY 4760-3590	LU 0066	11/17/97	\$121.56
	Occupation		
	Aggregate Year-to-Date		\$ 899.92
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
LU 0268 326 Brooklyn Street Sharon, PA 16146-2239	LU 0268	11/17/97	\$30.00
	Occupation		
	Aggregate Year-to-Date		\$ 412.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
LU 0639 47 Alice Drive Ackron, OH 44319	LU 0639	11/17/97	\$207.91
		11/17/97	\$423.37
	Occupation	11/21/97	\$324.41
		11/26/97	\$602.25
	Aggregate Year-to-Date		\$ 8,306.96
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
LU 0758 1734 West Washington Street Indianapolis, IN 46222-4543	LU 0758	11/21/97	\$124.50
	Occupation		
	Aggregate Year-to-Date		\$ 263.50
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
LU 1003 4455 West Washington Street Indianapolis, IN 46241-0823	LU 1003	11/26/97	\$28.00
		11/26/97	\$47.00
	Occupation		
	Aggregate Year-to-Date		\$ 208.60
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
LU 1775 431 South Mapleton Street Columbus, IN 47201	LU 1775	11/26/97	\$31.00
		11/26/97	\$36.00
	Occupation	11/26/97	\$64.00
	Aggregate Year-to-Date		\$ 292.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>\$ 2,173.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

