

Salter & Company, LLC

Certified Public Accountants

4600 EAST-WEST HIGHWAY • SUITE 300
BETHESDA, MD 20814
Telephone 301 830-7400 Facsimile 301 830-7401

RECEIVED
FEC MAIL CENTER

2008 JUL 18 AM 8: 54

July 14, 2008

Mr. Daniel T. Buckley
Campaign Finance Analyst
Reports Analysis Division
Federal Elections Commission
999 E Street, NW
Washington, DC 20463

Dear Mr. Buckley:

Our client, United Association Political Education Committee (UAPEC), has instructed us to respond to your notice dated June 13, 2008. We have enclosed a copy of that notice for your convenience.

The Committee's May Monthly Report correctly reported all contributions as unitemized receipts in Line 11 (a)(ii). The report is correct as filed.

A redesignation letter was sent to the Jill Morganthaler campaign. The redesignation will be reported on the UAPEC July 20th monthly report.

The UAPEC has informed Pipefitters Local Union 524 that they should request reimbursement of \$500 from the Arlen Specter campaign. The requested refund is to clear up a \$500 excessive contribution.

The \$10,000 contribution to the 21st Century Democrats was reported incorrectly in the original May monthly report. The UAPEC actually made a \$5,000 federal contribution to the 21st Century Democrats federal PAC and a \$5,000 contribution to the 21st Century Democrats non-federal account. The May monthly report will be amended to reflect the true nature of this check.

Please let me know if this response is not acceptable to you. If you should have any further questions, please contact me.

Sincerely,



Jerome J. Robertson, CPA

28039784729



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

June 13, 2008

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

Response Due Date:
July 14, 2008

Identification Number: C00012476

Reference: May Monthly Report (4/1/08-4/30/08)

Dear Treasurer:

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. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 4 items:

1. Line 11(a)(ii) of the Detailed Summary Page discloses \$241,582.19 in unitemized receipts from individuals/persons other than political committees during the reporting period. Please clarify whether this figure includes any receipts from a single source that aggregate greater than \$200 in the calendar year. If this is the case, please amend your report(s) by itemizing the receipts on Schedule A supporting Line 11(a)(i). 2 U.S.C. §434(b)(2)(A) and (3)(A)

2. Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the 2008 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 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.

28039784730

UNITED ASSOCIATION POLITICAL EDUCATION COMMITTEE**Page 2**

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.

3. 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 committee and its affiliates from making contributions to another political committee and its affiliates in excess of \$5,000 per 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 \$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 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 regarding the excessive contribution(s), your prompt action in obtaining a refund will be taken into consideration.

28039784731

UNITED ASSOCIATION POLITICAL EDUCATION COMMITTEE

Page 3

4. 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 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 must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. 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. **Requests for extensions of time in which to respond will not be considered.**

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

28039784732

UNITED ASSOCIATION POLITICAL EDUCATION COMMITTEE**Page 4**

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

Senior Campaign Finance Analyst
Reports Analysis Division

226

28039784733

UNITED ASSOCIATION POLITICAL EDUCATION COMMITTEE

Page 5

Contribution After Election Date

Recipient Name	Date	Amount	Election	Election State - Date
JILL MORGENTHALER	04/01/2008	\$2,500.00	P-2008	IL - 02/05/2008

Excessive Contribution to a Committee

Recipient Name	Date	Amount	Report
21st Century Democrats	04/02/2008	\$10,000.00	2008 May Monthly

Excessive Contribution to a Candidate

Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
Specter, Arlen	09/25/2007	\$500.00	G-2008	2007 Year End	Pipefitters Local Union #524
ARLEN SPECTER	03/17/2008	\$4,000.00	G-2008	2008 April Monthly	United Association Political Education Committee
ARLEN SPECTER	04/01/2008	\$1,000.00	G-2008	2008 May Monthly	United Association Political Education Committee

28039784734

LLM

July 11, 2008

Jill Morganthaler for Congress
190 N. Swift Road, Ste. M
Addison, IL 61010

Gentlemen:

Please be advised that the United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry gave a check for \$2,500.00 to Jill Morganthaler for Congress dated April 1, 2008 for her 2008 Primary election. At this time we are re-designating that \$2,500.00 to her 2008 General Campaign.

If you have any questions, please contact Luckie McClintock, Director of Political and Legislative Affairs at (202) 628-5823, ext. 296.

With best wishes, I am

Sincerely yours,



William P. Hite
General President

WPH:paw
Enclosure

28039784735

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 7/14/04
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
Delivery Confirmation™ or Signature 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
	Next Business Day Delivery <input type="checkbox"/>
<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

JMA
 PREPARER
 (3/2005)

7/18/04
 DATE PREPARED

28039784736