

# BUZZI UNICEM USA INC.

RECEIVED  
FEC MAIL  
OPERATIONS CENTER



2005 MAR 17 P 12:08

William S. Collumbien  
Executive Vice President  
& Chief Financial Officer

March 16, 2005

Ms. Elizabeth Boody  
Federal Election Commission  
Washington, DC 20463

Dear Ms. Boody,

We recently received the attached notice from the Federal Election Commission regarding excessive contributions to the primary election campaign of Congressman Charles Dent. The original 2004 October Quarterly Report failed to indicate which election the contributions applied to. After review of our records, we have determined that the \$2,500 contribution reported on the 2004 October Quarterly Report should have been reported as a contribution to the general election for Congressman Charles Dent. However, since the Buzzi Unicem USA Inc. Political Action Committee does not currently qualify as a multi-candidate committee, we recognize that the \$2,500 contribution is in excess of the limits set forth in Act. 2 U.S.C. § 441a(a) by \$500.

As a result of the above findings, we have:

1. Prepared an amended 2004 October Quarterly Report to properly report the \$2,500 as a contribution for the general election.
2. Sent a letter to Congressman Charles Dent requesting the refund of the excess contribution of \$500.

Copies of the amended report and the request for refund are attached for your reference. We hope that this information satisfies the requirements of the Federal Election Commission. If you have any questions, please feel free to contact me at 610/882-5022.

Sincerely,

A handwritten signature in cursive script that reads "William S. Collumbien".

William S. Collumbien  
Treasurer  
Buzzi Unicem USA Inc. Political Action Committee

WSC/cs

Attachments

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Lami

RQ-2



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 16, 2005

William S Collumbien, Treasurer  
Buzzi Unicem USA Inc Political Action Committee  
100 Brodhead Road Suite 230  
Bethlehem, PA 18017

**Response Due Date:**  
**March 18, 2005**

Identification Number: C00281675

Reference: October Quarterly Report (7/1/04-9/30/04)

Dear Mr. Collumbien:

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 one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a non-multicandidate political committee and its affiliates, from making a contribution to a candidate for federal office in excess of \$2,000 per election. Please refer to the Campaign Guide for information on how a committee qualifies for multicandidate status.

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.

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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.

If your committee has met the criteria for multicandidate status, please file FEC FORM 1M "Notification of Multicandidate Status" with the Commission. The treasurer must file FEC FORM 1M no later than ten (10) calendar days after qualifying for multicandidate committee status. 11 CFR §102.2(a)(3)

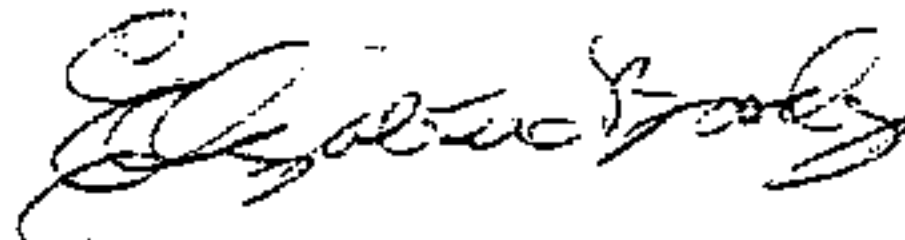
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which 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.

**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) 694-1686.

Sincerely,



Elizabeth Boody  
Campaign Finance Analyst  
Reports Analysis Division

<b>Recipient Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>	<b>Report</b>
Charlie Dent for Congress	6/6/03	\$2,000.00	2004 Primary	2003 Mid-Year
Charlie Dent for Congress	8/17/04	\$2,500.00	2004 Primary	2004 October Quarterly

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# BUZZI UNICEM USA INC.



Michael K. Berlin  
Senior Vice President  
Marketing / Promotion / Government Affairs

March 16, 2005

Congressman Charles W. Dent  
701 West Broad Street  
Suite 200  
Bethlehem, PA 18018

Dear Congressman Dent:

We recently received a notice from the Federal Election Commission regarding contributions to your 2004 general election campaign in excess of the limits set forth in Act. 2 U.S.C. § 441a(a). On August 17, 2004, our records indicate that the Buzzi Unicem USA Inc. Political Action Committee contributed \$2,500 to your campaign efforts. As a non-multi-candidate committee, the Buzzi Unicem USA Inc. PAC is limited to contributions of \$2,000 to a candidate for federal office per election.

We kindly request the refund of the excess contribution in the amount of \$500. Please mail the check, payable to Buzzi Unicem USA Inc. Political Action Committee, to my attention at 100 Brodhead Road, Suite 230, Bethlehem, PA 18017-8989.

If you have any questions, please feel free to contact me at 610/882-5016.

Sincerely,

Handwritten signature of Michael K. Berlin in cursive.  
Michael K. Berlin

MKB/cs

cc: Lani Neff



**SUMMARY PAGE  
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

Buzzi Unicem USA Inc. Political Action Committee

Report Covering the Period: From:  /  /  To:  /  /

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, <input type="text" value="2004"/>		7 4 3 3 6 3
(b) Cash on Hand at Beginning of Reporting Period.....	1 5 4 6 8 6 3	
(c) Total Receipts (from Line 19) .....	1 7 0 0 0 0	1 1 8 8 5 0 0
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	1 7 1 6 8 6 3	1 9 3 1 8 6 3
7. Total Disbursements (from Line 31).....	3 6 5 0 0 0	5 8 0 0 0 0
d. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)).....	1 3 5 1 8 6 3	1 3 5 1 8 6 3
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) .....	0 0 0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) .....	0 0 0	

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This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

**For further information contact:**

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

Toll Free 800-424-9530  
Local 202-694-1100

**DETAILED SUMMARY PAGE**  
of Receipts

FEC Form 3X (Rev. 02/2003)

Page 3

Write or Type Committee Name

Buzzi Unicem USA Inc. Political Action Committee

Report Covering the Period: From: MM / DD / YYYY 07 / 01 / 2004 To: MM / DD / YYYY 09 / 30 / 2004

**I. Receipts**

**COLUMN A**  
Total This Period

**COLUMN B**  
Calendar Year-to-Date

11. Contributions (other than loans) From:

(a) Individuals/Persons Other Than Political Committees

(i) Itemized (use Schedule A).....

1 2 5 0 0 0

5 1 5 0 0 0

(ii) Unitemized.....

4 5 0 0 0

6 7 3 5 0 0

(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶

1 7 0 0 0 0

1 1 8 8 5 0 0

(b) Political Party Committees.....

(c) Other Political Committees (such as PACs).....

(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶

1 7 0 0 0 0

1 1 8 8 5 0 0

12. Transfers From Affiliated/Other Party Committees.....

13. All Loans Received.....

14. Loan Repayments Received.....

15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....

16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....

17. Other Federal Receipts (Dividends, Interest, etc.).....

18. Transfers from Non-Federal and Levin Funds

(a) Non-Federal Account (from Schedule H3).....

(b) Levin Funds (from Schedule H5).....

(c) Total Transfers (add 18(a) and 18(b))..

19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶

1 7 0 0 0 0

1 1 8 8 5 0 0

20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶

1 7 0 0 0 0

1 1 8 8 5 0 0

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**DETAILED SUMMARY PAGE**  
of Disbursements

**II. Disbursements**

**COLUMN A**  
Total This Period

**COLUMN B**  
Calendar Year-to-Date

21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share .....		
(ii) Non-Federal Share.....		
(b) Other Federal Operating Expenditures .....		
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b)) .....	0 0 0	0 0 0
22. Transfers to Affiliated/Other Party Committees.....		
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	3 5 0 0 0 0	5 5 0 0 0 0
24. Independent Expenditures (use Schedule E) .....		
25. Coordinated Party Expenditures (2 U.S.C. §441a(d)) (use Schedule F) .....		
26. Loan Repayments Made.....		
27. Loans Made.....		
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees .....		
(b) Political Party Committees .....		
(c) Other Political Committees (such as PACs).....		
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)).....	0 0 0	0 0 0
29. Other Disbursements .....	1 5 0 0 0	3 0 0 0 0
30. Federal Election Activity (2 U.S.C. §431(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share .....		
(ii) "Levin" Share .....		
(b) Federal Election Activity Paid Entirely With Federal Funds .....	0 0 0	0 0 0
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b)).....	0 0 0	0 0 0
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) ..	3 6 5 0 0 0	5 8 0 0 0 0
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....	3 6 5 0 0 0	5 8 0 0 0 0

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**DETAILED SUMMARY PAGE**  
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

**III. Net Contributions/Operating Expenditures**

**COLUMN A**  
Total This Period

**COLUMN B**  
Calendar Year-to-Date

33. Total Contributions (other than loans) (from Line 11(d), page 3) .....	1 7 0 0 0 0	1 1 8 8 5 0 0
34. Total Contribution Refunds (from Line 28(d)) .....	0 0 0	0 0 0
35. Net Contributions (other than loans) (subtract Line 34 from Line 33) .....	1 7 0 0 0 0	1 1 8 8 5 0 0
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b)) .....	0 0 0	0 0 0
37. Offsets to Operating Expenditures (from Line 15, page 3) .....	0 0 0	0 0 0
38. Net Operating Expenditures (subtract Line 37 from Line 36) .....	0 0 0	0 0 0

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**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FGR LINE NUMBER: (check only one)		PAGE 1		OF 1	
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17	

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)

**BUZZI UNICEM USA, INC. POLITICAL ACTION COMMITTEE**

Full Name (Last, First, Middle Initial) <b>A. White, John W.</b>			Date of Receipt 07 / 09 / 2004		
Mailing Address 14854 Victory Court			Amount of Each Receipt this Period 750 00		
City Carmel	State IN	Zip Code 46032	Amount of Each Receipt this Period 750 00		
FEC ID number of contributing federal political committee. C			Amount of Each Receipt this Period 750 00		
Name of Employer Buzzi Unicem USA Inc.		Occupation Vice President Logistics			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 750 00			
Full Name (Last, First, Middle Initial) <b>B. Nugent, Daniel B.</b>			Date of Receipt 07 / 09 / 2004		
Mailing Address 100 Brodhead Road			Amount of Each Receipt this Period 250 00		
City Bethlehem	State PA	Zip Code 18017-8935	Amount of Each Receipt this Period 250 00		
FEC ID number of contributing federal political committee. C			Amount of Each Receipt this Period 250 00		
Name of Employer Buzzi Unicem USA Inc.		Occupation Dir. Environmental Affairs.			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 250 00			
Full Name (Last, First, Middle Initial) <b>C. Eaton, Richard M.</b>			Date of Receipt 08 / 02 / 2004		
Mailing Address 9671 Prairiewood Way			Amount of Each Receipt this Period 250 00		
City Carmel	State IN	Zip Code 46032-9230	Amount of Each Receipt this Period 250 00		
FEC ID number of contributing federal political committee. C			Amount of Each Receipt this Period 250 00		
Name of Employer Buzzi Unicem USA Inc.		Occupation Sales Manager			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 250 00			
SUBTOTAL of Receipts This Page (optional).....			1 250 00		
TOTAL This Period (last page this line number only).....			1 250 00		

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**SCHEDULE B (FEC Form 3X)  
ITEMIZED DISBURSEMENTS**

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"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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)  
Buzzi Unicem USA Inc. Political Action Committee

**A.** Full Name (Last, First, Middle Initial)  
Fund For A Conservative Future PAC

Date of Disbursement  
07 / 06 / 2004

Mailing Address  
406 Virginia Avenue

City: Alexandria State: VA Zip Code: 22302

Purpose of Disbursement: General Contribution  
Candidate Name: Jim Inhofe  
Category/Type: 012

Office Sought:  House  Senate  President  
Disbursement For:  Primary  General  Other (specify) ▼

State: District:

Amount of Each Disbursement this Period  
1 0 0 0 0 0

**B.** Full Name (Last, First, Middle Initial)  
Charles Dent for Congress

Date of Disbursement  
08 / 17 / 2004

Mailing Address  
P O Box 442

City: Allentown State: PA Zip Code: 18105

Purpose of Disbursement: General Contribution  
Candidate Name: Charles Dent  
Category/Type: 012

Office Sought:  House  Senate  President  
Disbursement For:  Primary  General  Other (specify) ▼

State: District:

Amount of Each Disbursement this Period  
2 5 0 0 0 0

**C.** Full Name (Last, First, Middle Initial)

Date of Disbursement

Mailing Address

City State Zip Code

Purpose of Disbursement

Candidate Name

Category/Type

Office Sought:  House  Senate  President  
Disbursement For:  Primary  General  Other (specify) ▼

State: District:

Amount of Each Disbursement this Period

SUBTOTAL of Disbursements This Page (optional) .....>

TOTAL This Period (last page this line number only) .....>

3,500.00

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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.

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<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked
<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 checked="" type="checkbox"/> Overnight Delivery Service (Specify): <b>UPS</b>	Shipping Date
Next Business Day Delivery <input checked="" 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

**QALP**  
 PREPARER  
 (3/2005)

**3/17/05**  
 DATE PREPARED