



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

James Ricci, Treasurer
UDV North America Inc. Employees'
Political Participation Committee
750 East Main Street
Stamford, CT 06902

JAN 31 2001

Identification Number: C00034470

Reference: 30 Day Post-General Report (10/19/00-11/27/00)

Dear Mr. Ricci:

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 (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee and its affiliates from receiving contributions from another political committee or person in excess of \$5,000 per calendar year. Records at the Commission, however, indicate that your committee may actually be affiliated with Heublein Distributors PAC. As provided for in 11 CFR §100.5(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 §102.6(a)

If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the

treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

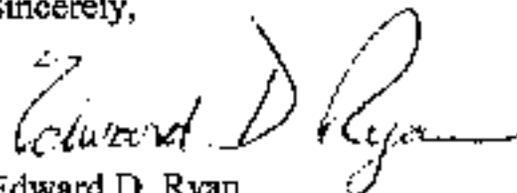
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

If, on the other hand, Heublein Distributors PAC 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 regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount, or further clarification of your relationship, if any, with Heublein Distributors PAC will be taken into consideration.

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 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Edward D. Ryan
Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

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

FOR LINE NUMBER 11C

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)
UDV NORTH AMERICA EMPLOYEES POLITICAL PARTICIPATION COMMITTEE

Full Name, Mailing Address, and ZIP Code

HEUBLEIN DISTRIBUTORS PAC

750 EAST MAIN STREET

STAMFORD CT 06902

Name of Employer

Occupation

Date (month, day, year)

10/30/2000

Amount of Each Receipt this Period

14161.50

Receipt For: Primary General

Other (specify):

Aggregate Year-to-Date \$ 14161.50

EDC

SUBTOTALS of Receipts This Page (Optional)

TOTALS This Period (last page this line number only)

14161.50

