

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Charles Iversen, Treasurer Plumbers Local 14 P A C Fund 150 Main Street Lodi, NJ 07644

FEB 1 6 2002

Identification Number:

C00191213

Reference:

Mid-Year Report (1/1/01-6/30/01)

Dear Mr. Iversen:

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 B supporting Line 21(b) (pertinent portion(s) attached) discloses \$999.96 in disbursements to The New Jersey State Pipe Trades PAC Fund and the Plumbers Local 14 Welfare Fund for "Travel Expenses Reimbursed" and "Accounting Reimbursement". You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information regarding these transactions including the date(s) when the original activity was conducted by the non-federal account. In addition, if any of the disbursements disclosed on Schedule B supporting Line 21(b) were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in-kind contributions on Schedule B supporting Line 23, or as independent expenditures on Schedule E supporting Line 24. 11 CFR §§104.3(b)(3) and 106.1

Although the Commission may initiate legal action regarding the activities conducted by the non-federal account(s), any clarifying information that you can provide will be taken into consideration.

Any amendment or clarification should be filed with the Federal Election Commission. <u>Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that</u>

<u>are being amended</u>. 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,

Jim Krebs

Reports Analyst

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Reports Analysis Division

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