

REPORTS ANALYSIS REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: December 28, 2007

ANALYST: Daniel Buckley

I. COMMITTEE: United Association Political Education Committee  
C00012476  
William P. Hite, Treasurer (12/3/2004 – Present)  
Martin J. Maddaloni, Treasurer (1/29/1997– 12/2/2004)  
901 Massachusetts Avenue N.W.  
Washington, DC 20001-4307

TYPE OF COMMITTEE Separate Segregated Fund - Labor Organization

II. REGISTRATION: Prior to 1977

III. BACKGROUND:

The Committee was sent nineteen (19) Requests for Additional Information (RFAIs) for reporting errors involving excessive, prohibited and other impermissible contributions or transfers, mathematical discrepancies, failure to provide supporting schedules, failure to properly itemize contributions and transfers to political committees, and problems with reporting financial activity/FEC database.

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VIOLATION DESCRIPTION	REPORT(S)	DETAILS OF VIOLATION
Excessive, Prohibited and Other Impermissible Contributions or Transfers	2005 M8	The Committee failed to provide clarification for \$25,000.00 in transfers to an apparent non-federal account, when there is no evidence that its expenses are being allocated between a federal and non-federal account.
Excessive, Prohibited and Other Impermissible Contributions or Transfers	2006 M6	Schedule B of the Committee's report disclosed contributions designated for the 2006 Primary elections of four (4) federal candidates totaling \$17,500.00. These contributions were dated after the respective state primaries.
Excessive, Prohibited and Other Impermissible Contributions or Transfers	2006 M7	Schedule B of the Committee's report disclosed contributions designated for the 2006 Primary elections of six (6) federal candidates totaling \$23,000.00. These contributions were dated after the respective state primaries.
Excessive, Prohibited and Other Impermissible Contributions or Transfers	2006 M8	<p>Schedule B of the Committee's report disclosed excessive and impermissible contributions made totaling \$4,250.00. These contributions were made to three (3) federal candidates. The excessive and impermissible contributions are detailed below:</p> <ul style="list-style-type: none"> <li>• The Committee made contributions totaling \$4,000.00 which are contributions in excess of the \$5,000 per election limit.</li> <li>• The Committee also made a contribution totaling \$250.00 which was a contribution designated for the 2006 Primary Election dated after the respective state primary.</li> </ul>
Excessive, Prohibited and Other Impermissible Contributions or Transfers	Amended 2006 M9 , received 11/6/06	Schedule B of the Committee's report disclosed an excessive contribution made totaling \$5,000.00. This contribution was made to one (1) federal candidate.
Excessive, Prohibited and Other Impermissible Contributions or Transfers	2006 30G	Schedule B of the Committee's report disclosed excessive contributions made totaling \$7,000.00. These contributions were made to one (1) federal candidate and one (1) political party committee.
Mathematical Discrepancies	2006 M10	The Committee's report contained Column B discrepancies totaling \$824,013.54.
Mathematical Discrepancies	Amended 2006 12G , received 12/27/06	The Committee's report contained Column B discrepancies totaling \$824,013.54.
Failure to Provide Supporting Schedules	2006 YE	Line 11(a)(ii) Column A of the Detailed Summary page disclosed \$161,330.06 in unitemized receipts, while Line 11(a)(i) Column A of the Detailed Summary Page did not disclose any receipts.

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		However, the Committee failed to clarify whether the amount disclosed on Line 11(a)(ii) includes any receipts aggregating greater than \$200 from an individual/person in the calendar year.
Failure to Properly Itemize Contributions and Transfers to Political Committees	2006 M4	The Committee failed to provide the address for a contribution to one (1) political party committee totaling \$15,000.00.
Problems with Reporting Financial Activity/FEC Database	2006 M9	The Committee failed to correctly disclose the redesignation of six (6) contributions to federal candidates totaling \$23,000.00.

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