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January 19, 2010

**MEMORANDUM**

**AGENDA ITEM**

To: The Commission

For Meeting of 1 - 20 - 10

Through: Alec Palmer *AP*  
Acting Staff Director

**SUBMITTED LATE**

From: John D. Gibson *JG*  
Chief Compliance Officer

Joseph F. Stoltz *JFS*  
Assistant Staff Director  
Audit Division

Tom Hintermister *TH*  
Audit Manager

By: Bill Antosz *BA*  
Lead Auditor

Subject: Late Submission- Audit Hearing for AFL-CIO COPE Political  
Contributions Committee (AFL-CIO)

Counsel for AFL-CIO has submitted documents to supplement its audit hearing request and response to the draft Final Audit Report dated November 16, 2009. These documents are attached and can be found at the following location. Ntsrv1\ voting ballot matters\Audit\AFL-CIO\Audit Hearing. Should you have any questions, please contact Bill Antosz or Tom Hintermister at 694-1200.

Attachments:

Supplement to AFL-CIO Audit Hearing Request/Response  
(January 15, 2010)

# American Federation of Labor and Congress of Industrial Organizations



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January 15, 2010

Joseph F. Stoltz  
Assistant Staff Director  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

**Re: Draft Final Audit Report for AFL-CIO  
COPE PCC (2005-06)**

Dear Mr. Stoltz:

I am submitting this letter and its attachments on behalf of the AFL-CIO and the AFL-CIO Committee on Political Education Political Contributions Committee ("AFL-CIO COPE PCC") to supplement my letter dated November 16, 2009. We make this submission in order to bring to the Commission's attention documents and information that are contained in the Commission's records, some of which came to our attention for the first time only this week. These documents cast an entirely new and, we submit, dispositive light on the issues that have been raised in Finding 2 of the October 28, 2009 draft final audit report prepared by the Audit Division and supported by the October 15, 2009 memorandum of the Office of General Counsel ("OGC Memorandum").

The key document (Attachment A) is a final report concerning AFL-CIO COPE PCC that the Commission approved on June 7, 1979, that examined, addressed and endorsed the same joint fundraising arrangements and reporting practices that have been placed at issue in the current audit. In that report, the Commission explicitly advised AFL-CIO COPE PCC that it could undertake those arrangements and reporting practices in precisely the manner that the committee, and 46 national labor organization separate segregated funds ("SSFs"), have undertaken for over 30 years.

Our discovery of this report renders all the more inexplicable why, variously, the Reports Analysis Division (RAD), the Audit Division and OGC have challenged these practices, and raises the question as to why those Commission offices were unaware of or

failed to acknowledge the 1979 audit report throughout the past five years of our dealings with them on the joint fundraising issue.

The AFL-CIO regrets its own loss of institutional memory regarding the 1979 audit. The 1979 audit came to our attention only this week, in long-archived internal files, labeled "1977 Federal Election Commission Information and Correspondence" and "FEC 1978 Correspondence," that were examined as we completed a review of records at both the AFL-CIO and the Commission's Public Records Room in order to identify and list for the Commission all of the joint fundraising transfers to AFL-CIO COPE PCC that occurred prior to 1993, in order to supplement Attachment 2 to our November 16, 2009 submission, which compiled that information from 1993 to the present. But, we submit, it was the Commission's affirmative responsibility to take the 1979 audit into account in dealing with AFL-CIO COPE PCC since 2004 on the very same matters that the Commission's 1979 final report addressed.

The 1979 final audit report concluded an audit of AFL-CIO COPE PCC covering the period from January 1, 1975 to June 30, 1977. Section II(A) of the report, "Committee Receipts," recited how AFL-CIO COPE PCC received its funds, and Section II(A)(3) addressed joint fundraising arrangements:

3) The PCC conducts what appear to be joint fundraising efforts with member unions. Our review of Committee records indicated at least one (1) instance where the joint fundraising efforts on the part of the PCC and a national union consisted solely of literature supplied by the national union to its members indicating that a percentage of the monies collected for the union's political action committee would ultimately be forwarded to the PCC. In this instance, the union had not requested nor received PCC membership ticket booklets for distribution to its members. These funds were reported as unitemized contributions by the PCC, with no indication on the PCC disclosure reports that joint fundraising efforts were conducted. However, since the transmittal of the joint fundraising proceeds represent transfers of the funds from the political Committees of the labor organization to the PCC, such transfers, regardless of amount, should be itemized by the PCC as required by Section 434(b)(4) of Title 2, United States Code.

Accordingly, on August 3, 1978 the Commission determined that the following procedures be used when the AFL-CIO engages in joint fundraising activities with a member union.

In order for the solicitation to constitute a “joint fundraising effort” on the part of the PCC and the member union political committee the person soliciting the contribution must, among other requirements under Section 114.5 of the Commission’s Regulations (11 CFR 114.5), inform the member at the time of the solicitation of the purpose of the fund (i.e., that a portion of the funds will be sent to the AFL-CIO COPE PCC). Funds solicited in this manner which are transferred from the member union political committee to the PCC are not subject to the contribution limitations (see 2 U.S.C. 441a(a)(5)(A) ). Funds which are not raised un the conditions set forth above are not joint fundraising efforts and are subject to the contribution limitations when transfers are made. When using this manner of solicitation and collection, 1) the political committee of the member union would report these funds as itemized or unitemized contributions when received; 2) the transfer out of funds from the member union political committee to the PCC would be labeled as a joint fundraising effort and reported as a transfer by the political committee of the member union on the next report; and 3) the PCC would then report these funds as transfer-in from the member union political committee on the next report and label each of these transfers “joint fundraising efforts.”

*Id.* at 3-4.

Accordingly, the Commission explicitly upheld the lawfulness of the joint fundraising arrangements between AFL-CIO COPE PCC and the SSFs of its affiliated (in the AFL-CIO constitutional sense) national unions so long as individual members were solicited to contribute to *both* their own union’s SSF and AFL-CIO COPE PCC; and, the Commission explicitly directed that the *SSF* alone report and itemize as necessary those individual contributions, and that the SSF and AFL-CIO COPE PCC then each report only a single lump sum “joint fundraising” transfer between them.

The 1979 audit report distinguished this joint fundraising arrangement from the situation where an affiliated union “solicits contributions solely on behalf of the AFL-CIO,” and not also for its *own* SSF; in that situation, the Commission advised, the SSF must timely transmit the contributions to AFL-CIO COPE PCC, which in turn must account for these individual receipts on its own reports to the Commission. *Id.* at 3, 5. That advice, of course, is consistent with the Commission’s subsequent collecting agent regulations.

That the Commission was fully apprised of the underlying facts during the audit is evident not only from the final audit report, but also from the preceding August 8, 1978

findings and recommendations of the Audit Division staff (Attachment B), and various correspondence between the Audit Division and the AFL-CIO between September 7, 1977, and January 16, 1978 (Attachment C), which explained how members of AFL-CIO-affiliated unions were solicited to contribute both to their union's SSF and AFL-CIO COPE PCC, and that those SSFs then made lump-sum joint fundraising transfers to AFL-CIO COPE PCC.<sup>1</sup>

It is now clear that the 1979 audit report both ratified existing practices and sanctioned them for the future for both AFL-CIO COPE PCC and national union SSFs. Attachment D lists every joint fundraising transfer by an SSF to AFL-CIO COPE PCC that occurred between 1975 and 1992 (again, the period preceding the similar 1993-present spreadsheet that was Attachment 2 to our November 16, 2009 letter). Like its successor list, the 1975-92 spreadsheet reflects that, month in and month out, year after year, AFL-CIO COPE PCC regularly reported as "joint fundraising"<sup>2</sup> payments from SSFs that, either themselves or in the aggregate from the same SSF during a calendar year, far exceeded the \$5,000/year limit that applies to contributions between unaffiliated political committees that lack a joint fundraising relationship.

In total, Attachment D lists 640 joint fundraising transfers over 18 years, including 266 that exceeded \$5,000, distributed as follows:

- 32 over \$5,000 and up to \$10,000
- 92 over \$10,000 and up to \$25,000
- 31 over \$25,000 and up to \$50,000
- 8 over \$50,000 and up to \$100,000
- 3 over \$100,000 and up to \$156,000

Again, to be clear, each of these was a *single reported transfer*, not aggregated sums from a particular SSF over a particular year; those aggregates, of course, yield much higher figures. And, of course, every transfer that AFL-CIO COPE PCC reported was also reported by the transferor SSF – so, *between 1975 and 1992 there were 1,280 total joint*

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<sup>1</sup> As the Commission will see, the AFL-CIO was represented in that audit by Special Counsel Laurence Gold. That Laurence Gold, who subsequently served as the General Counsel of the AFL-CIO, is neither the undersigned nor a relation.

<sup>2</sup> The report entries variously say "joint fundraising transfer," "joint fundraising effort" and closely similar phrases, which the spreadsheet uniformly terms "joint fundraising." AFL-CIO COPE PCC routinely noted this in the "Name of Employers" space on Schedule A. *See, e.g.* Attachment. E. (Our November 16, 2009 letter inadvertently attributed these entries on Attachment 2 to "the transferor SSF" rather than to AFL-CIO COPE PCC.)

*fundraising entries on reports submitted to the Commission.*<sup>3</sup> And, as we previously showed, there have been another 381 joint fundraising transfer since 1993, or a total of 762 more such entries in reports filed with the Commission – so, *over 2,000 overall since 1975.*

The records from 1975 to the present also reflect that no fewer than 46 union SSFs at one time or another have entered into joint fundraising arrangements with AFL-CIO COPE PCC. They are:

- Active Ballot Club
- AFGE Committee on Federal Employee Political Education
- AFT COPE
- AFT COPE S&L
- Allied Industrial Workers of America
- Amalgamated Clothing Workers of America PAC
- AMCOPE
- American Federation of Musicians Political Contribution Committee
- American Radio Association Political Contribution Committee
- BCT International Union PAC
- Campaign Fund of Allied Industrial Workers of America
- Carpenters CLIC
- Committee on Letter Carriers Political Education
- Connecticut Carpenters Local 210 OPC
- COPE Committee of the United Rubber Workers
- COPE Intl Molders & Allied Workers Union
- COPE UFWA
- CWA COPE
- Firemen & Oilers Political League
- Graphic Arts Intl Union Political Contribution Committee
- HERE
- IAM Non Partisan League
- IBEW COPE
- ILGWU Campaign Committee
- Intl Longshoremen's Association Political Action Fund
- IUE COPE
- Laborers Investment in Voter Education
- Laundry & Dry Cleaning Intl Union
- Marine Engineers Political Action Fund
- Meat Cutters & Butcher Workmen
- Oil Chemical & Atomic Workers Political League

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<sup>3</sup> And, insofar as the AFL-CIO COPE PCC reports itemized contributions at the thresholds required by 2 U.S.C. § 434(b)(3) and 11 C.F.R. § 104.3(a)(4), those reports have always listed only the AFL-CIO or an affiliated state or local central body as the individual contributor's employer.

- OPEIU Local #2 COPE
- Pipe Fitters Local 533
- Political Action Together Political Account
- Political Fund Committee of APWU
- Railway Clerks Political League
- Seafarers Political Activity Donation
- SEIU COPE
- Sheet Metal Workers Political Action League
- Transport Workers Union Political Contribution Committee
- UAW V-CAP
- United Food and Commercial Workers
- United Furniture Workers of America COPE Committee
- United Rubber, Cork & Plastic Workers
- United Steelworkers of America Political Action Fund
- Voice of the Electorate OPEIU

It is clear that all of these SSFs, like AFL-CIO COPE PCC, relied upon an understanding of the Act and the Commission's regulations that was informed in critical part by the Commission's 1979 audit of AFL-CIO COPE PCC itself. We have not researched whether or not, since 1979, the Commission has ever audited any of these 46 committees for a period during which it made one or more joint fundraising transfers to AFL-CIO COPE PCC. If there were any such audits, and no adverse audit findings were made about any such transfers, then that would further bolster the conclusion that these arrangements in every respect were and are both lawful and sanctioned by the Commission.

In light of this record, we suggest that at the audit hearing "the Commissioners... pose questions designed to elicit clarification from the Office of General Counsel or Office of Staff Director," FEC, "Procedural Rules for Audit Hearings," 74 Fed. Reg. 33140, 33142 (July 10, 2009), as follows:

1. Why, from June 1979 until October 20, 2004, did RAD never question the over 2,000 joint fundraising entries on AFL-CIO COPE PCC's and other SSFs' reports to the Commission, including the approximately 900 that each exceeded \$5,000, and the many more that exceeded \$5,000/year in the aggregate from the same SSF?
2. Why did RAD suddenly begin to challenge these arrangements in October 2004, and why, when it did so, did it fail to apprise AFL-CIO COPE PCC of the 1979 audit report?
3. Why didn't RAD, OGC or the Audit Division locate the 1979 audit report and take that into account in dealing with the current audit?
4. Why did neither the 2009 interim and draft final audit reports nor the OGC Memorandum acknowledge, let alone address, the extensive record of 1993-

2008 joint fundraising transactions that AFL-CIO COPE PCC provided to the Audit Division with its July 8, 2008 letter to the Audit Division that commented on its exit conference “potential findings”?

5. Did RAD, OGC or the Audit Division ever research the Commission’s records, the AFL-CIO COPE PCC’s reports, or the reports of the SSFs in response to our repeated showings during this audit that these arrangements were both open and longstanding?

Although the statute does not specify the legal significance of an audit finding or recommendation, we submit that, absent an intervening change in the governing law, such a finding both binds the Commission and protects the audited committee from any sanction by the Commission if it relies on that finding or recommendation. AFL-CIO COPE PCC plainly did so. And, none of the various amendments of the Act and the Commission’s regulations since 1979 have displaced any of the key features of the law that were extant when the 1979 audit report was issued. Then, as now, the Act exempted joint fundraising from the usual committee-to-committee contribution limits; required a recipient committee of contributions to keep records on and report them to the Commission; required a recipient committee to itemize individual contributions at a particular threshold; and treated a labor federation’s members as members also of its affiliated unions while treating those unions as unaffiliated with the federation itself.

Specifically too, the 1979 amendments to the Act, which amended some political committee reporting requirements, did not affect the relative reporting obligations of committees engaged in joint fundraising. See Pub. 96-187, 93 Stat. 1339; H.R. Rep. No. 96-422 (1979), reprinted in 1979 U.S. Code and Cong. Admin. News 2860. And, the Commission’s adoption of its joint fundraising rules for persons other than SSFs and its collecting agent rules entailed no changes that undermined the arrangements and relationships endorsed by the Commission in its 1979 audit of AFL-CIO COPE PCC. See FEC, “Transfer of Funds: Collecting Agents, Joint Fundraising,” 48 Fed. Reg. 26298 (June 7, 1983); FEC, “Amendments to Federal Election Campaign Act of 1971; Regulations Transmitted to Congress,” 45 Fed. Reg. 15080 (March 7, 1980).

We have previously demonstrated why – without regard to the 1979 audit report – the Act and the Commission’s regulations do not favor, let alone require, the Audit Division’s Finding 2. If there is any legal doubt as to how the Commission ought to interpret and apply the Act and its regulations to this matter, the 1979 audit report should tip the scale in favor of the position that the Commission both endorsed and then, without objection or even, apparently, question, accepted for another 25 years.

We stand ready to participate in the January 20 audit hearing. If for any reason the Commission instead would prefer to reschedule the hearing in order for it to elicit further information from within the Commission due to this submission, we would have no objection to its doing so.

Thank you for your consideration.

Yours truly,

A handwritten signature in black ink, appearing to read "Laurence E. Gold". The signature is fluid and cursive, with the first name being the most prominent.

Laurence E. Gold  
Associate General Counsel

LEG:lb

cc: Elizabeth H. Shuler, AFL-CIO COPE PCC Treasurer  
Karen Ackerman, AFL-CIO Political Director

REPORT	NAME	LINE NUMBER	TYPE OF TRANSACTION	AMOUNT	DATE
December	Amalgamated Clothing Workers of America PAC	Schedule A	None Listed	15000	1/1-12/31/75
December	CWA COPE	Schedule A	None Listed	19411	1/1-12/31/75
December	COPE UFWA	Schedule A	None Listed	2812.09	1/1-12/31/75
December	ILGWU Campaign Committee	Schedule A	None Listed	85000	1/1-12/31/75
December	Allied Industrial Workers of America	Schedule A	None Listed	13500	1/1-12/31/75
December	Laundry & Dry Cleaning Intl Union	Schedule A	None Listed	600	1/1-12/31/75
December	Marine Engineers Political Action Fund	Schedule A	None Listed	12000	1/1-12/31/75
December	AMCOPE	Schedule A	None Listed	17143.86	1/1-12/31/75
December	Railway Clerks Political League	Schedule A	None Listed	44030	1/1-12/31/75
December	COPE Committee of the United Ruber Wkrs	Schedule A	None Listed	29824	1/1-12/31/75
December	Firemen & Oilers Political League	Schedule A	None Listed	10030	1/1-12/31/75
December	Transport Workers Union Pol Contribution Committ	Schedule A	None Listed	12000	1/1-12/31/75
December	COPE Intl Molders & Allied Workers Union	Schedule A	None Listed	3348.33	1/1-12/31/75
December	United Furniture Workers of America COPE Comm	Schedule A	None Listed	4800	1/1-12/31/76
December	Meatcutters & Butcher Workmen	Schedule A	None Listed	49291.45	1/1-12/31/76
December	COPE Intl Molders & Allied Workers Union	Schedule A	None Listed	12700	1/1-12/31/76
December	Voice of the Electorate OPEIU	Schedule A	None Listed	7200	1/1-12/31/76
December	Oil Chem & Atomic Wkrs Political League	Schedule A	None Listed	30013.24	1/1-12/31/76
December	Active Ballot Club	Schedule A	None Listed	16870	1/1-12/31/76
December	United Rubber, Cork & Plastic Workers	Schedule A	None Listed	60833.4	1/1-12/31/76
December	AFT COPE	Schedule A	None Listed	156000	1/1-12/31/76
December	Transport Workers Union Pol Contribution Committ	Schedule A	None Listed	36875	1/1-12/31/76
December	Amalgamated Clothing Workers of America PAC	Schedule A	None Listed	20000	1/1-12/31/76
December	ILGWU Campaign Committee	Schedule A	None Listed	80000	1/1-12/31/76
December	HERE	Schedule A	None Listed	10000	1/1-12/31/76
December	IAM Non Partisan League	Schedule A	None Listed	25000	1/1-12/31/76
December	Marine Engineers Political Action Fund	Schedule A	None Listed	5435	1/1-12/31/76
December	Seafarers Political Activity Donation	Schedule A	None Listed	10030	1/1-12/31/76
December	RR Signalmen of America - Political League	Schedule A	None Listed	250	1/1-12/31/76
December	United Steelworkers of America Pol Action Fund	Schedule A	None Listed	50000	1/1-12/31/76
December	Amalgamated Clothing Workers of America PAC	Schedule A	None Listed	5000	1/1-12/31/76
December	American Federation of Musicians Pol Contribution	Schedule A	None Listed	10000	1/1-12/31/76
December	American Radio Association Pol Contribution Comr	Schedule A	None Listed	210	1/1-12/31/76
December	Graphic Arts Intl Union Pol Cont Committee	Schedule A	None Listed	5000	1/1-12/31/76
December	Amalgamated Clothing Workers of America PAC	Schedule A	Joint Fundraising	47915	1/1-12/31/77
December	IUE COPE	Schedule A	Joint Fundraising	10000	1/1-12/31/77
December	United Furniture Workers of America COPE Comm	Schedule A	Joint Fundraising	2700	1/1-12/31/77
December	ILGWU Campaign Committee	Schedule A	Joint Fundraising	30000	1/1-12/31/77
December	Meatcutters & Butcher Workmen	Schedule A	Joint Fundraising	11000	1/1-12/31/77
December	COPE Intl Molders & Allied Workers Union	Schedule A	Joint Fundraising	4000	1/1-12/31/77
December	Voice of the Electorate OPEIU	Schedule A	Joint Fundraising	18561	1/1-12/31/77
December	Oil Chem & Atomic Wkrs Political League	Schedule A	Joint Fundraising	12546.45	1/1-12/31/77
December	Railway Clerks Political League	Schedule A	Joint Fundraising	15000	1/1-12/31/77
December	Active Ballot Club	Schedule A	Joint Fundraising	7500	1/1-12/31/77
December	AFT COPE	Schedule A	Joint Fundraising	63295	1/1-12/31/77
December	Transport Workers Union Pol Contribution Committ	Schedule A	Joint Fundraising	11875	1/1-12/31/77
December	CWA COPE	Schedule A	Joint Fundraising	5000	1/1-12/31/77
December	Firemen & Oilers Political League	Schedule A	Joint Fundraising	500	1/1-12/31/77
December	AFGE Committee on Federal Employee Political Edi	Schedule A	Joint Fundraising	5000	1/1-12/31/77
December	Marine Engineers Political Action Fund	Schedule A	Joint Fundraising	5000	1/1-12/31/77
September	United Furniture Workers of America COPE Comm	Schedule A	Joint Fundraising	4874.55	1/1-9/30/78
September	ILGWU Campaign Committee	Schedule A	Joint Fundraising	40000	1/1-9/30/78
September	IAM Non Partisan League	Schedule A	Joint Fundraising	50000	1/1-9/30/78
September	Meatcutters & Butcher Workmen	Schedule A	Joint Fundraising	25328.55	1/1-9/30/78
September	COPE Intl Molders & Allied Workers Union	Schedule A	Joint Fundraising	3500	1/1-9/30/78
September	Voice of the Electorate OPEIU	Schedule A	Joint Fundraising	15000	1/1-9/30/78
September	Oil Chem & Atomic Wkrs Political League	Schedule A	Joint Fundraising	15478.99	1/1-9/30/78
September	Railway Clerks Political League	Schedule A	Joint Fundraising	14000	1/1-9/30/78
September	AFT COPE	Schedule A	Joint Fundraising	26000	1/1-9/30/78
September	United Rubber, Cork & Plastic Workers	Schedule A	Joint Fundraising	39890	1/1-9/30/78
September	Transport Workers Union Pol Contribution Committ	Schedule A	Joint Fundraising	11875	1/1-9/30/78
Annual	Voice of the Electorate OPEIU	Schedule A	None Listed	3175.96	10/27/1978
Annual	Oil Chem & Atomic Wkrs Political League	Schedule A	None Listed	2628.28	10/27/1978
Annual	IUE COPE	Schedule A	None Listed	5000	10/25/1978
Annual	Firemen & Oilers Political League	Schedule A	None Listed	1000	12/8/1978
Annual	United Furniture Workers of America COPE Comm	Schedule A	None Listed	1225.45	12/8/1978
Annual	United Rubber, Cork & Plastic Workers	Schedule A	None Listed	39040	12/27/1978
February	Oil Chem & Atomic Wkrs Political League	15B	Joint Fundraising	568.25	2/15/1979
March	Oil Chem & Atomic Wkrs Political League	15B	Joint Fundraising	1902	1/11/1979
March	Oil Chem & Atomic Wkrs Political League	15B	Joint Fundraising	438.65	3/9/1979
May	United Furniture Workers of America COPE Comm	15B	Joint Fundraising	1000	5/25/1979

June	Oil Chem & Atomic Wkrs Political League	15B	Joint Fundraising	2433.43	6/15/1979
June	Transport Workers Union Pol Contribution Committ	15B	Joint Fundraising	10625	6/27/1979
July	Oil Chem & Atomic Wkrs Political League	15B	Joint Fundraising	1083.25	7/20/1979
July	AFT COPE	15B	Joint Fundraising	15000	7/30/1979
October	Political Action Together Political Account	15B	Joint Fundraising	1620.5	10/12/1979
October	United Furniture Workers of America COPE Comm	15B	Joint Fundraising	1000	10/26/1979
November	Oil Chem & Atomic Wkrs Political League	15B	Joint Fundraising	2515.75	11/15/1979
December	ILGWU Campaign Committee	15B	Joint Fundraising	25000	12/14/1979
December	CWA COPE	15B	Joint Fundraising	10000	12/21/1979
January	Voice of the Electorate OPEIU	15B	Joint Fundraising	10000	1/23/1980
January	Oil Chem & Atomic Wkrs Political League	15B	Joint Fundraising	1475.8	1/23/1980
February	United Furniture Workers of America COPE Comm	15B	Joint Fundraising	4540	2/11/1980
February	AFT COPE	15B	Joint Fundraising	25000	2/11/1980
February	Oil Chem & Atomic Wkrs Political League	15B	Joint Fundraising	3654.5	2/11/1980
February	ILGWU Campaign Committee	15B	Joint Fundraising	25000	2/15/1980
February	Railway Clerks Political Leage	15B	Joint Fundraising	15760	2/26/1980
February	Voice of the Electorate OPEIU	15B	Joint Fundraising	20495	2/26/1980
February	OPEIU Local #2 COPE	15B	Joint Fundraising	315	2/29/1980
April	United Furniture Workers of America COPE Comm	11C	Joint Fundraising	1000	4/18/1980
May	Transport Workers Union Pol Contribution Committ	11C	Joint Fundraising	10625	5/28/1980
July	United Furniture Workers of America COPE Comm	11C	Joint Fundraising	1000	7/18/1980
July	Oil Chem & Atomic Wkrs Political League	11C	Joint Fundraising	2924.5	7/18/1980
July	AFT COPE	11C	Joint Fundraising	30000	7/18/1980
July	ILGWU Campaign Committee	11C	Joint Fundraising	25000	7/24/1980
August	Campaign Fund of the Allied Industrial Workers	11C	Joint Fundraising	6685.15	8/13/1980
August	COPE Committee of the United Ruber Wkrs	11C	Joint Fundraising	37640	8/22/1980
September	Oil Chem & Atomic Wkrs Political League	11C	Joint Fundraising	1500.33	9/12/1980
September	Campaign Fund of the Allied Industrial Workers	11C	Joint Fundraising	5737.5	9/15/1980
September	United Food and Commerical Workers	11C	Joint Fundraising	5000	9/17/1980
September	BCT Intl Union PAC	11C	Joint Fundraising	8000	4/30/1980
September	BCT Intl Union PAC	11C	Joint Fundraising	10000	8/15/1980
Annual	United Furniture Workers of America COPE Comm	12	Joint Fundraising	1000	10/17/1980
Annual	COPE Intl Molders & Allied Workers Union	12	Joint Fundraising	22500	10/17/1980
Annual	Campaign Fund of the Allied Industrial Workers	12	Joint Fundraising	541.62	10/28/1980
Annual	Oil Chem & Atomic Wkrs Political League	12	Joint Fundraising	3492.34	10/31/1980
Annual	ILGWU Campaign Committee	12	Joint Fundraising	5000	11/3/1980
Annual	Oil Chem & Atomic Wkrs Political League	12	Joint Fundraising	591	11/14/1980
March	IUE COPE	11C	Joint Fundraising	10000	3/6/1981
March	United Furniture Workers of America COPE Comm	11C	Joint Fundraising	1000	3/12/1981
March	Oil Chem & Atomic Wkrs Political League	11C	Joint Fundraising	2170.85	3/12/1981
March	Railway, Airline & Steamship Clerks	11C	Joint Fundraising	15600	3/20/1981
March	Seafarers Political Activity Donation	11C	Joint Fundraising	5000	3/23/1981
April	BCT Intl Union PAC	11C	Joint Fundraising	5000	4/10/1981
May	CWA COPE	11C	Joint Fundraising	5000	5/15/1981
June	BCT Intl Union PAC	11C	Joint Fundraising	5000	6/25/1981
June	Railway Clerks Political Leage	11C	Joint Fundraising	17170	6/26/1981
June	Voice of the Electorate OPEIU	11C	Joint Fundraising	21015	6/26/1981
July	United Furniture Workers of America COPE Comm	11C	Joint Fundraising	1000	7/10/1981
July	Oil Chem & Atomic Wkrs Political League	11C	Joint Fundraising	1711.46	7/10/1981
August	Marine Engineers Political Action Fund	11C	Joint Fundraising	5000	8/6/1981
August	AFT COPE	11C	Joint Fundraising	7500	8/6/1981
September	Oil Chem & Atomic Wkrs Political League	11C	Joint Fundraising	11482.6	9/11/1981
September	Firemen & Oilers Political League	11C	Joint Fundraising	4500	9/25/1981
October	BCT Intl Union PAC	11C	Joint Fundraising	15000	10/8/1981
October	Laborers Investment in Voter Education	11C	Joint Fundraising	2000	10/19/1981
October	Campaign Fund of the Allied Industrial Workers	11C	Joint Fundraising	12092.01	10/23/1981
October	Transport Workers Union Pol Contribution Committ	11C	Joint Fundraising	5500	10/28/1991
November	United Furniture Workers of America COPE Comm	11C	Joint Fundraising	1000	11/6/1981
November	Sheetmetal Workers Political Action League	11C	Joint Fundraising	15000	11/23/1981
December	AFT COPE	11C	Joint Fundraising	15000	12/18/1981
January	OPEIU Local #2 COPE	11C	Joint Fundraising	603	1/25/1982
February	Oil Chem & Atomic Wkrs Political League	11C	Joint Fundraising	8517.22	2/12/1982
March	United Furniture Workers of America COPE Comm	11C	Joint Fundraising	1000	3/19/1982
March	Railway Clerks Political Leage	11C	Joint Fundraising	30000	3/26/1982
May	IUE COPE	11C	Joint Fundraising	10000	5/19/1982
June	United Furniture Workers of America COPE Comm	11C	Joint Fundraising	1000	6/18/1982
June	Sheetmetal Workers Political Action League	11C	Joint Fundraising	28800	6/18/1982
July	United Furniture Workers of America COPE Comm	11C	Joint Fundraising	1000	7/30/1982
September	BCT Intl Union PAC	11C	Joint Fundraising	11233	9/30/1982
September	ILGWU Campaign Committee	11C	Joint Fundraising	4980	9/10/1982
September	Allied Industrial Workers of America	11C	Joint Fundraising	14328.72	9/10/1982
September	AFT COPE	11C	Joint Fundraising	115000	9/13/1982
September	AFGE Committee on Federal Employee Political Ed	11C	Joint Fundraising	50000	9/17/1982

September	United Furniture Workers of America COPE Comm	11C	Joint Fundraising	1437	9/24/1982
September	UAW V-CAP	11C	Joint Fundraising	100000	9/30/1982
PreGeneral	UAW V-CAP	11C	Joint Fundraising	10000	10/7/1982
PreGeneral	ILGWU Campaign Committee	11C	Joint Fundraising	4980	10/7/1982
Annual	UAW V-CAP	11C	Joint Fundraising	105000	10/25/1982
Annual	ILGWU Campaign Committee	11C	Joint Fundraising	15000	10/25/1982
Annual	ILGWU Campaign Committee	11C	Joint Fundraising	4980	11/12/1982
Annual	ILGWU Campaign Committee	11C	Joint Fundraising	4980	12/10/1982
January	ILGWU Campaign Committee	11C	Joint Fundraising	4980	1/14/1983
March	IUE COPE	11C	Joint Fundraising	12000	3/3/1983
March	ILGWU Campaign Committee	11C	Joint Fundraising	4980	3/3/1983
March	Railway Clerks Political League	11C	Joint Fundraising	30000	3/3/1983
March	ILGWU Campaign Committee	11C	Joint Fundraising	4800	3/3/1983
April	ILGWU Campaign Committee	11C	Joint Fundraising	4800	4/15/1983
May	ILGWU Campaign Committee	11C	Joint Fundraising	4800	5/6/1983
June	ILGWU Campaign Committee	11C	Joint Fundraising	4800	6/10/1983
July	ILGWU Campaign Committee	11C	Joint Fundraising	4800	7/15/1983
August	ILGWU Campaign Committee	11C	Joint Fundraising	4800	8/16/1983
September	IBEW COPE	11C	Joint Fundraising	1500	9/1/1983
September	ILGWU Campaign Committee	11C	Joint Fundraising	4800	9/9/1983
September	United Furniture Workers of America COPE Comm	11C	Joint Fundraising	1000	9/14/1983
September	Oil Chem & Atomic Wkrs Political League	11C	Joint Fundraising	7615.23	9/12/1983
September	IBEW COPE	11C	Joint Fundraising	1500	9/22/1983
October	ILGWU Campaign Committee	11C	Joint Fundraising	4600	10/18/1983
October	United Furniture Workers of America COPE Comm	11C	Joint Fundraising	1000	10/13/1983
October	IBEW COPE	11C	Joint Fundraising	1500	10/20/1983
November	ILGWU Campaign Committee	11C	Joint Fundraising	4600	11/8/1983
November	United Furniture Workers of America COPE Comm	11C	Joint Fundraising	800	11/18/1983
November	IBEW COPE	11C	Joint Fundraising	1500	11/17/1983
December	ILGWU Campaign Committee	11C	Joint Fundraising	4140	12/8/1983
December	United Furniture Workers of America COPE Comm	11C	Joint Fundraising	500	12/20/1983
December	IBEW COPE	11C	Joint Fundraising	1500	12/24/1983
January	ILGWU Campaign Committee	11C	Joint Fundraising	4140	1/8/1984
January	IBEW COPE	11C	Joint Fundraising	1500	1/9/1984
February	ILGWU Campaign Committee	11C	Joint Fundraising	4140	2/4/1984
February	AFT COPE	11C	Joint Fundraising	100000	2/8/1984
February	IBEW COPE	11C	Joint Fundraising	1500	2/17/1984
March	ILGWU Campaign Committee	11C	Joint Fundraising	4140	3/12/1984
March	Railway Clerks Political League	11C	Joint Fundraising	30000	3/7/1984
April	IBEW COPE	11C	Joint Fundraising	1500	3/23/1984
April	ILGWU Campaign Committee	11C	Joint Fundraising	4140	4/6/1984
April	UAW V-CAP	11C	Joint Fundraising	50000	4/6/1984
April	AFT COPE	11C	Joint Fundraising	50000	4/9/1984
April	IBEW COPE	11C	Joint Fundraising	1500	4/17/1984
May	CWA COPE	11C	Joint Fundraising	10000	5/10/1984
May	ILGWU Campaign Committee	11C	Joint Fundraising	4140	5/17/1984
May	IBEW COPE	11C	Joint Fundraising	1500	5/17/1984
June	United Furniture Workers of America COPE Comm	11C	Joint Fundraising	2000	5/29/1984
June	ILGWU Campaign Committee	11C	Joint Fundraising	4140	6/7/1984
June	IBEW COPE	11C	Joint Fundraising	1500	6/18/1984
June	Railway Clerks Political League	11C	Joint Fundraising	150.95	6/21/1984
June	ILGWU Campaign Committee	11C	Joint Fundraising	10000	6/25/1984
June	Voice of the Electorate OPEIU	11C	Joint Fundraising	20418.07	6/27/1984
July	Campaign Fund of the Allied Industrial Workers	11C	Joint Fundraising	15728.45	7/2/1984
July	OPEIU Local #2 COPE	11C	Joint Fundraising	298.75	7/2/1984
July	ILGWU Campaign Committee	11C	Joint Fundraising	105.9	7/9/1984
July	ILGWU Campaign Committee	11C	Joint Fundraising	4140	7/16/1984
July	United Furniture Workers of America COPE Comm	11C	Joint Fundraising	2000	7/16/1984
July	IBEW COPE	11C	Joint Fundraising	1500	7/18/1984
August	Oil Chem & Atomic Wkrs Political League	11C	Joint Fundraising	5500	8/6/1984
August	ILGWU Campaign Committee	11C	Joint Fundraising	4140	8/6/1994
August	ILGWU Campaign Committee	11C	Joint Fundraising	2500	8/17/1984
August	AFT COPE	11C	Joint Fundraising	10000	8/16/1984
August	IBEW COPE	11C	Joint Fundraising	1500	8/17/1984
August	United Furniture Workers of America COPE Comm	11C	Joint Fundraising	2000	8/24/1984
September	ILGWU Campaign Committee	11C	Joint Fundraising	4140	9/11/1984
September	UAW V-CAP	11C	Joint Fundraising	75000	9/17/1984
September	IBEW COPE	11C	Joint Fundraising	1500	9/18/1984
PreGeneral	CWA COPE	11C	Joint Fundraising	5000	10/3/1984
PreGeneral	ILGWU Campaign Committee	11C	Joint Fundraising	4140	10/5/1984
PreGeneral	Campaign Fund of the Allied Industrial Workers	11C	Joint Fundraising	10030	10/15/1984
Annual	IBEW COPE	11C	Joint Fundraising	1500	10/19/1984
Annual	BCT Intl Union PAC	11C	Joint Fundraising	2500	10/22/1984

Annual	CWA COPE	11C	Joint Fundraising	5000	11/5/1984
Annual	SEIU COPE	11C	Joint Fundraising	2500	11/6/1984
Annual	ILGWU Campaign Committee	11C	Joint Fundraising	4140	11/6/1984
Annual	IBEW COPE	11C	Joint Fundraising	1500	11/16/1984
Annual	ILGWU Campaign Committee	11C	Joint Fundraising	4140	12/7/1984
Annual	IBEW COPE	11C	Joint Fundraising	1500	12/17/1984
January	OPEIU Local #2 COPE	11C	Joint Fundraiser	278.25	1/9/1985
January	ILGWU Campaign Committee	11C	Joint Fundraiser	4140	1/9/1985
January	IBEW COPE	11C	Joint Fundraiser	1500	1/16/1985
February	ILGWU Campaign Committee	11C	Joint Fundraiser	3900	2/8/1985
February	IBEW COPE	11C	Joint Fundraiser	1500	2/19/1985
March	ILGWU Campaign Committee	11C	Joint Fundraiser	3900	3/6/1985
March	United Furniture Workers of America COPE Comm	11C	Joint Fundraiser	2000	3/12/1985
March	BCT Intl Union PAC	11C	Joint Fundraiser	500	3/13/1985
March	IBEW COPE	11C	Joint Fundraiser	1500	3/18/1985
April	Responsible Citizens Political League Brotherhood	11C	Joint Fundraiser	30000	4/3/1985
April	ILGWU Campaign Committee	11C	Joint Fundraiser	3900	4/8/1985
April	IBEW COPE	11C	Joint Fundraiser	1500	4/17/1985
May	ILGWU Campaign Committee	11C	Joint Fundraiser	3900	5/6/1985
May	IBEW COPE	11C	Joint Fundraiser	1500	5/16/1985
June	ILGWU Campaign Committee	11C	Joint Fundraiser	3900	6/7/1985
June	United Furniture Workers of America COPE Comm	11C	Joint Fundraiser	1000	6/13/1985
June	IBEW COPE	11C	Joint Fundraiser	1500	6/17/1985
July	ILGWU Campaign Committee	11C	Joint Fundraiser	3900	7/10/1985
July	IBEW COPE	11C	Joint Fundraiser	1500	7/18/1985
August	United Furniture Workers of America COPE Comm	11C	Joint Fundraiser	1000	8/19/1985
August	IBEW COPE	11C	Joint Fundraiser	1500	8/19/1985
August	BCT Intl Union PAC	11C	Joint Fundraiser	1000	8/22/1985
September	United Furniture Workers of America COPE Comm	11C	Joint Fundraiser	1000	9/12/1985
September	IBEW COPE	11C	Joint Fundraiser	1500	9/17/1985
September	CWA COPE	11C	Joint Fundraiser	50000	9/19/1985
September	United Furniture Workers of America COPE Comm	11C	Joint Fundraiser	79.12	9/19/1985
September	IBEW COPE	11C	Joint Fundraiser	5000	9/23/1985
September	ILGWU Campaign Committee	11C	Joint Fundraiser	3600	9/24/1985
September	CWA COPE	11C	Joint Fundraiser	5000	9/24/1985
October	UAW V-CAP	11C	Joint Fundraiser	25000	10/3/1985
October	BCT Intl Union PAC	11C	Joint Fundraiser	1200	10/11/1985
October	IBEW COPE	11C	Joint Fundraiser	1500	10/17/1985
October	ILGWU Campaign Committee	11C	Joint Fundraiser	3600	10/22/1985
October	Active Ballot Club	11C	Joint Fundraiser	20006.54	10/25/1985
November	Voice of the Electorate OPEIU	11C	Joint Fundraiser	21360	11/13/1985
November	Active Ballot Club	11C	Joint Fundraiser	20006.54	11/15/1985
November	ILGWU Campaign Committee	11C	Joint Fundraiser	3600	11/18/1985
November	IBEW COPE	11C	Joint Fundraiser	1500	11/19/1985
December	IBEW COPE	11C	Joint Fundraiser	4000	12/11/1985
December	ILGWU Campaign Committee	11C	Joint Fundraiser	3600	12/16/1985
December	Active Ballot Club	11C	Joint Fundraiser	20006.54	12/16/1985
December	IBEW COPE	11C	Joint Fundraiser	1500	12/19/1985
December	UAW V-CAP	11C	Joint Fundraiser	30000	12/19/1985
January	OPEIU Local #2 COPE	11C	Joint Fundraiser	637.89	1/6/1986
January	Active Ballot Club	11C	Joint Fundraiser	20006.54	1/9/1986
January	ILGWU Campaign Committee	11C	Joint Fundraiser	3600	1/21/1986
January	United Furniture Workers of America COPE Comm	11C	Joint Fundraiser	1500	1/22/1986
January	IBEW COPE	11C	Joint Fundraiser	1500	1/22/1986
January	Responsible Citizens Political League Brotherhood	11C	Joint Fundraiser	24301	1/23/1986
February	Active Ballot Club	11C	Joint Fundraiser	2006.54	2/12/1986
February	Active Ballot Club	11C	Joint Fundraiser	71.61	2/12/1986
February	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	2/20/1986
February	IBEW COPE	11C	Joint Fundraiser	1500	2/21/1986
March	United Furniture Workers of America COPE Comm	11C	Joint Fundraiser	1000	3/6/1986
March	Active Ballot Club	11C	Joint Fundraiser	20006.54	3/11/1986
March	IBEW COPE	11C	Joint Fundraiser	1500	3/17/1986
March	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	3/19/1986
March	BCT Intl Union PAC	11C	Joint Fundraiser	1500	3/31/1986
April	IBEW COPE	11C	Joint Fundraiser	5000	4/1/1986
April	Active Ballot Club	11C	Joint Fundraiser	20006.54	4/10/1986
April	CWA COPE	11C	Joint Fundraiser	1000	4/11/1986
April	IBEW COPE	11C	Joint Fundraiser	62.5	4/16/1986
April	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	4/21/1986
April	IBEW COPE	11C	Joint Fundraiser	1500	4/24/1986
April	IBEW COPE	11C	Joint Fundraiser	3500	4/24/1986
May	United Furniture Workers of America COPE Comm	11C	Joint Fundraiser	1000	5/5/1986
May	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	5/15/1986

May	IBEW COPE	11C	Joint Fundraiser	1500	5/16/1986
May	Active Ballot Club	11C	Joint Fundraiser	20006.54	5/20/1986
June	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	6/16/1986
June	Active Ballot Club	11C	Joint Fundraiser	20006.54	6/16/1986
June	BCT Intl Union PAC	11C	Joint Fundraiser	1000	6/17/1986
July	IBEW COPE	11C	Joint Fundraiser	6500	7/7/1986
July	ILGWU Campaign Committee	11C	Joint Fundraiser	83.88	7/9/1986
July	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	7/9/1986
July	Active Ballot Club	11C	Joint Fundraiser	20006.54	7/10/1986
July	Active Ballot Club	11C	Joint Fundraiser	83.88	7/15/1986
July	IBEW COPE	11C	Joint Fundraiser	1500	7/21/1986
July	United Furniture Workers of America COPE Comm	11C	Joint Fundraiser	1000	7/21/1986
August	BCT Intl Union PAC	11C	Joint Fundraiser	500	8/6/1986
August	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	8/18/1986
August	IBEW COPE	11C	Joint Fundraiser	1500	8/18/1986
August	United Furniture Workers of America COPE Comm	11C	Joint Fundraiser	1000	8/22/1986
September	OPEIU Local #2 COPE	11C	Joint Fundraiser	471.53	9/3/1986
September	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	9/15/1986
September	UAW V-CAP	11C	Joint Fundraiser	40000	9/18/1986
September	Active Ballot Club	11C	Joint Fundraiser	20006.54	9/18/1986
September	CWA COPE	11C	Joint Fundraiser	25000	9/19/1986
September	CWA COPE	11C	Joint Fundraiser	5000	9/23/1986
September	BCT Intl Union PAC	11C	Joint Fundraiser	500	9/25/1986
PreGeneral	BCT Intl Union PAC	11C	Joint Fundraiser	1000	10/1/1986
PreGeneral	IBEW COPE	11C	Joint Fundraiser	1500	10/6/1986
PreGeneral	IBEW COPE	11C	Joint Fundraiser	64000	10/7/1986
PreGeneral	UAW V-CAP	11C	Joint Fundraiser	40000	10/7/1986
PreGeneral	BCT Intl Union PAC	11C	Joint Fundraiser	250	10/10/1986
PreGeneral	BCT Intl Union PAC	11C	Joint Fundraiser	3500	10/14/1986
PreGeneral	UAW V-CAP	11C	Joint Fundraiser	20000	10/14/1986
PreGeneral	CWA COPE	11C	Joint Fundraiser	25000	10/14/1986
Annual	Active Ballot Club	11C	Joint Fundraiser	20006.54	10/17/1986
Annual	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	10/17/1986
Annual	IBEW COPE	11C	Joint Fundraiser	1500	10/21/1986
Annual	Campaign Fund of the Allied Industrial Workers of	11C	Joint Fundraiser	15324	10/24/1986
Annual	BCT Intl Union PAC	11C	Joint Fundraiser	1500	10/27/1986
Annual	AFT COPE	11C	Joint Fundraiser	5000	10/29/1986
Annual	Voice of the Electorate OPEIU	11C	Joint Fundraiser	22080	11/10/1986
Annual	Active Ballot Club	11C	Joint Fundraiser	20006.54	11/12/1986
Annual	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	12/1/1986
Annual	CWA COPE	11C	Joint Fundraiser	15000	12/1/1986
Annual	IBEW COPE	11C	Joint Fundraiser	25000	12/1/1986
Annual	Active Ballot Club	11C	Joint Fundraiser	20006.54	12/15/1986
Annual	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	12/15/1986
Annual	OPEIU Local #2 COPE	11C	Joint Fundraiser	365.71	12/29/1986
January	IBEW COPE	11C	Joint Fundraiser	3000	1/6/1987
January	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	1/16/1987
January	IBEW COPE	11C	Joint Fundraiser	1500	1/20/1987
February	OPEIU Local #2 COPE	11C	Joint Fundraiser	79.39	2/9/1987
March	AFT COPE	11C	Joint Fundraiser	25000	3/4/1987
March	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	3/13/1987
March	Active Ballot Club	11C	Joint Fundraiser	20006.54	3/24/1987
March	IBEW COPE	11C	Joint Fundraiser	1500	3/25/1987
March	AFT COPE	11C	Joint Fundraiser	25000	3/26/1987
April	OPEIU Local #2 COPE	11C	Joint Fundraiser	184.86	4/3/1987
April	BCT Intl Union PAC	11C	Joint Fundraiser	1000	4/6/1987
April	IBEW COPE	11C	Joint Fundraiser	1500	4/20/1987
April	IBEW COPE	11C	Joint Fundraiser	5200	4/23/1987
April	AFT COPE	11C	Joint Fundraiser	25000	4/23/1987
April	Active Ballot Club	11C	Joint Fundraiser	20006.54	4/28/1987
April	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	4/30/1987
May	CWA COPE	11C	Joint Fundraiser	25000	5/13/1987
May	AFT COPE	11C	Joint Fundraiser	25000	5/14/1987
May	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	5/15/1987
May	IBEW COPE	11C	Joint Fundraiser	1500	5/20/1987
June	CWA COPE	11C	Joint Fundraiser	22500	6/5/1987
June	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	6/16/1987
June	Responsible Citizens Political League Brotherhood	11C	Joint Fundraiser	10000	6/18/1987
June	IBEW COPE	11C	Joint Fundraiser	1500	6/19/1987
June	AFT COPE	11C	Joint Fundraiser	25000	6/29/1987
June	UAW V-CAP	11C	Joint Fundraiser	7000	6/30/1987
July	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	7/14/1987
July	CWA COPE	11C	Joint Fundraiser	25000	7/17/1987

July	OPEIU Local #2 COPE	11C	Joint Fundraiser	200.98	7/22/1987
July	IBEW COPE	11C	Joint Fundraiser	1500	7/28/1987
August	Political Fund Committee of APWU	11C	Joint Fundraiser	5000	8/4/1987
August	Responsible Citizens Political League Brotherhood	11C	Joint Fundraiser	5000	8/9/1987
August	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	8/14/1987
August	Responsible Citizens Political League Brotherhood	11C	Joint Fundraiser	5000	8/30/1987
September	IBEW COPE	11C	Joint Fundraiser	1500	9/3/1987
September	Responsible Citizens Political League Brotherhood	11C	Joint Fundraiser	3576	9/15/1987
September	IBEW COPE	11C	Joint Fundraiser	1500	9/16/1987
September	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	9/18/1987
October	IBEW COPE	11C	Joint Fundraiser	1500	10/19/1987
October	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	10/19/1987
November	CWA COPE	11C	Joint Fundraiser	25000	11/18/1987
November	ILGWU Campaign Committee	11C	Joint Fundraiser	3400	11/20/1987
December	IBEW COPE	11C	Joint Fundraiser	1500	12/2/1987
December	OPEIU Local #2 COPE	11C	Joint Fundraiser	189.49	12/7/1987
December	UAW V-CAP	11C	Joint Fundraiser	50000	12/7/1987
December	Voice of the Electorate OPEIU	11C	Joint Fundraiser	20640	12/15/1987
December	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	12/15/1987
December	IBEW COPE	11C	Joint Fundraiser	1500	12/16/1987
December	IBEW COPE	11C	Joint Fundraiser	10000	12/24/1987
January	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	1/20/1988
January	IBEW COPE	11C	Joint Fundraiser	1500	1/20/1988
February	UAW V-CAP	11C	Joint Fundraiser	25000	2/1/1988
February	AFT COPE	11C	Joint Fundraiser	35000	2/12/1988
February	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	2/16/1988
February	IBEW COPE	11C	Joint Fundraiser	1500	2/18/1988
February	OPEIU Local #2 COPE	11C	Joint Fundraiser	170.86	2/29/1988
March	UAW V-CAP	11C	Joint Fundraiser	25000	3/8/1988
March	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	3/14/1988
March	IBEW COPE	11C	Joint Fundraiser	1500	3/18/1988
March	IBEW COPE	11C	Joint Fundraiser	5000	3/21/1988
March	UAW V-CAP	11C	Joint Fundraiser	25000	3/21/1988
March	CWA COPE	11C	Joint Fundraiser	25000	3/23/1988
April	AFT COPE	11C	Joint Fundraiser	40000	4/12/1988
April	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	4/18/1988
April	IBEW COPE	11C	Joint Fundraiser	1500	4/19/1988
May	Campaign Fund of the Allied Industrial Workers of I	11C	Joint Fundraiser	14304	5/4/1988
May	UAW V-CAP	11C	Joint Fundraiser	25000	5/6/1988
May	AFT COPE	11C	Joint Fundraiser	22000	5/11/1988
May	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	5/13/1988
May	IBEW COPE	11C	Joint Fundraiser	1500	5/18/1988
May	Pipefitters Local 533	11C	Joint Fundraiser	4000	5/31/1988
June	BCT Int'l Union PAC	11C	Joint Fundraiser	2000	6/1/1988
June	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	6/10/1988
June	Responsible Citizens Political League Brotherhood	11C	Joint Fundraiser	10000	6/10/1988
June	AFT COPE	11C	Joint Fundraiser	28000	6/16/1988
June	IBEW COPE	11C	Joint Fundraiser	1500	6/22/1988
June	OPEIU Local #2 COPE	11C	Joint Fundraiser	368.72	6/22/1988
July	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	7/18/1988
July	IBEW COPE	11C	Joint Fundraiser	1500	7/19/1988
August	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	8/22/1988
August	CWA COPE	11C	Joint Fundraiser	25000	8/24/1988
August	IBEW COPE	11C	Joint Fundraiser	1500	8/26/1988
September	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	9/12/1988
September	IBEW COPE	11C	Joint Fundraiser	1500	9/20/1988
September	BCT Int'l Union PAC	11C	Joint Fundraiser	500	9/23/1988
PreGeneral	Int'l Longshoremens Association Political Action Fu	11C	Joint Fundraiser	25000	10/5/1988
Annual	Voice of the Electorate OPEIU	11C	Joint Fundraiser	19440	12/1/1988
Annual	IBEW COPE	11C	Joint Fundraiser	1500	12/3/1988
Annual	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	12/9/1988
Annual	AFT COPE	11C	Joint Fundraiser	25000	12/27/1988
January	AFT COPE	11C	Joint Fundraiser	25000	1/13/1989
January	IBEW COPE	11C	Joint Fundraiser	1500	1/23/1989
January	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	1/30/1989
February	OPEIU Local #2 COPE	11C	Joint Fundraiser	172.53	2/3/1989
February	AFT COPE	11C	Joint Fundraiser	25000	2/7/1989
February	IBEW COPE	11C	Joint Fundraiser	1500	2/17/1989
February	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	2/21/1989
March	Active Ballot Club	11C	Joint Fundraiser	10000	3/14/1989
March	AFT COPE	11C	Joint Fundraiser	25000	3/16/1989
March	IBEW COPE	11C	Joint Fundraiser	1500	3/17/1989
March	CWA COPE	11C	Joint Fundraiser	25000	3/21/1989

March	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	3/28/1989
April	AFT COPE	11C	Joint Fundraiser	25000	4/7/1989
April	Active Ballot Club	11C	Joint Fundraiser	20000	4/14/1989
April	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	4/18/1989
April	IBEW COPE	11C	Joint Fundraiser	1500	4/18/1989
April	Responsible Citizens Political League Brotherhood	11C	Joint Fundraiser	250	4/20/1989
April	OPEIU Local #2 COPE	11C	Joint Fundraiser	203.1	4/27/1989
May	AFT COPE S&L	11C	Joint Fundraiser	25000	5/5/1989
May	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	5/12/1989
May	Active Ballot Club	11C	Joint Fundraiser	25000	5/15/1989
May	IBEW COPE	11C	Joint Fundraiser	1500	5/24/1989
May	CWA COPE	11C	Joint Fundraiser	25000	5/24/1989
June	Active Ballot Club	11C	Joint Fundraiser	20000	6/16/1989
June	Responsible Citizens Political League Brotherhood	11C	Joint Fundraiser	10000	6/16/1989
June	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	6/20/1989
June	AFT COPE S&L	11C	Joint Fundraiser	25000	6/21/1989
June	IBEW COPE	11C	Joint Fundraiser	1500	6/22/1989
July	CWA COPE	11C	Joint Fundraiser	25000	7/6/1989
July	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	7/19/1989
July	Active Ballot Club	11C	Joint Fundraiser	20000	7/20/1989
July	IBEW COPE	11C	Joint Fundraiser	1500	7/21/1989
July	OPEIU Local #2 COPE	11C	Joint Fundraiser	183	7/26/1989
July	UAW V-CAP	11C	Joint Fundraiser	25000	7/31/1989
August	CWA COPE	11C	Joint Fundraiser	25000	8/2/1989
August	Active Ballot Club	11C	Joint Fundraiser	20000	8/15/1989
August	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	8/18/1989
August	UAW V-CAP	11C	Joint Fundraiser	25000	8/21/1989
August	IBEW COPE	11C	Joint Fundraiser	1500	8/29/1989
September	Active Ballot Club	11C	Joint Fundraiser	20000	9/14/1989
September	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	9/19/1989
September	UAW V-CAP	11C	Joint Fundraiser	25000	9/20/1989
September	IBEW COPE	11C	Joint Fundraiser	1500	9/27/1989
September	CWA COPE	11C	Joint Fundraiser	25000	9/29/1989
October	Campaign Fund of the Allied Industrial Workers of /	11C	Joint Fundraiser	14415	10/2/1989
October	Campaign Fund of the Allied Industrial Workers of	11C	Joint Fundraiser	1250	10/10/1989
October	Active Ballot Club	11C	Joint Fundraiser	20000	10/16/1989
October	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	10/16/1989
October	CWA COPE	11C	Joint Fundraiser	25000	10/20/1989
October	UAW V-CAP	11C	Joint Fundraiser	25000	10/20/1989
October	BCT Int'l Union PAC	11C	Joint Fundraiser	3000	10/20/1989
October	OPEIU Local #2 COPE	11C	Joint Fundraiser	189.5	10/20/1989
October	Committee on Letter Carriers Political Education	11C	Joint Fundraiser	1250	10/26/1989
November	Active Ballot Club	11C	Joint Fundraiser	20000	11/15/1989
November	IBEW COPE	11C	Joint Fundraiser	1500	11/16/1989
November	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	11/17/1989
November	Committee on Letter Carriers Political Education	11C	Joint Fundraiser	1000	11/28/1989
November	Voice of the Electorate OPEIU	11C	Joint Fundraiser	19824	11/30/1989
December	Active Ballot Club	11C	Joint Fundraiser	20000	12/12/1989
December	IBEW COPE	11C	Joint Fundraiser	1500	12/18/1989
December	IAM Non Partisan League	11C	Joint Fundraiser	5000	12/20/1989
December	Connecticut Carpenters Local 210 OPC	11C	Joint Fundraiser	4500	12/21/1989
December	ILGWU Campaign Committee	11C	Joint Fundraiser	3000	12/22/1989
January	ILGWU Campaign Committee	11C	Joint Fundraiser	3,000.00	1/16/1990
January	IBEW COPE	11C	Joint Fundraiser	1,500.00	1/12/1990
February	OPEIU Local #2 COPE	11C	Joint Fundraiser	187.50	2/9/1990
February	Active Ballot Club	11C	Joint Fundraiser	20,000.00	2/9/1990
February	IBEW COPE	11C	Joint Fundraiser	1,500.00	2/13/1990
February	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	2/21/1990
March	OPEIU Local #2 COPE	26C	Joint Fundraiser	84.72	3/1/1990
March	Active Ballot Club	11C	Joint Fundraiser	40,000.00	3/13/1990
March	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	3/21/1990
March	IBEW COPE	11C	Joint Fundraiser	1,500.00	3/23/1990
April	BCT Int'l Union PAC	11C	Joint Fundraiser	200.00	4/11/1990
April	Active Ballot Club	11C	Joint Fundraiser	20,000.00	4/16/1990
April	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	4/19/1990
April	IBEW COPE	11C	Joint Fundraiser	1,500.00	4/25/1990
May	OPEIU Local #2 COPE	11C	Joint Fundraiser	152.75	5/4/1990
May	AFT COPE S&L	11C	Joint Fundraiser	15,000.00	5/14/1990
May	Active Ballot Club	11C	Joint Fundraiser	20,000.00	5/14/1990
May	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	5/18/1990
May	IBEW COPE	11C	Joint Fundraiser	1,500.00	5/22/1990
May	UAW-V-CAP	11C	Joint Fundraiser	25,000.00	5/22/1990
June	IBEW COPE	11C	Joint Fundraiser	1,500.00	6/5/1990

June	AFT COPE	11C	Joint Fundraiser	15,000.00	6/13/1990
June	Active Ballot Club	11C	Joint Fundraiser	20,000.00	6/18/1990
June	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	6/18/1990
June	UAW-V-CAP	11C	Joint Fundraiser	5,000.00	6/22/1990
June	CWA COPE	11C	Joint Fundraiser	4,500.00	6/28/1990
June	OPEIU Local #2 COPE	26C	Joint Fundraiser	86.73	6/4/1990
July	IBEW COPE	11C	Joint Fundraiser	4,000.00	7/9/1990
July	Sheetmetal Workers Political Action League	11C	Contribution	75.30	7/11/1990
July	Carpenters CLIC	11C	Contribution	75.30	7/16/1990
July	Active Ballot Club	11C	Joint Fundraiser	20,000.00	7/20/1990
July	OPEIU Local #2 COPE	26C	Joint Fundraiser	83.98	7/2/1990
August	IBEW COPE	11C	Joint Fundraiser	1,500.00	8/2/1990
August	IBEW COPE	11C	Joint Fundraiser	1,500.00	8/8/1990
August	Carpenters CLIC	11C	Joint Fundraiser	373.34	8/15/1990
August	Active Ballot Club	11C	Joint Fundraiser	20,000.00	8/16/1990
August	ILGWU Campaign Committee	11C	Joint Fundraiser	5,600.00	8/21/1990
September	IBEW COPE	11C	Joint Fundraiser	1,500.00	9/18/1990
September	Active Ballot Club	11C	Joint Fundraiser	20,000.00	9/17/1990
September	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	9/24/1990
September	BCT Intl Union PAC	11C	Joint Fundraiser	1,000.00	9/28/1990
September	OPEIU Local #2 COPE	26C	Joint Fundraiser	86.23	9/11/1990
PreGeneral	Campaign Fund of the Allied Industrial Workers	11C	Joint Fundraiser	14,343.60	10/1/1990
PreGeneral	OPEIU Local #2 COPE	26C	Joint Fundraiser	84.18	10/2/1990
Annual	Active Ballot Club	11C	Joint Fundraiser	20,000.00	10/19/1990
Annual	IBEW COPE	11C	Joint Fundraiser	1,500.00	10/22/1990
Annual	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	10/29/1990
Annual	Active Ballot Club	11C	Joint Fundraiser	20,000.00	11/19/1990
Annual	OPEIU Local #2 COPE	26C	Joint Fundraiser	84.03	11/5/1990
Annual	IBEW COPE	11C	Joint Fundraiser	1,500.00	12/3/1990
Annual	IBEW COPE	11C	Joint Fundraiser	1,500.00	12/26/1990
Annual	Active Ballot Club	11C	Joint Fundraiser	20,000.00	12/13/1990
Annual	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	12/3/1990
Annual	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	12/28/1990
Annual	Voice of the Electorate OPEIU	11C	Joint Fundraiser	20,544.00	12/3/1990
Annual	OPEIU Local #2 COPE	26C	Joint Fundraiser	86.28	12/1/1990
January	Active Ballot Club	11C	Joint Fundraiser	20,000.00	1/11/1991
January	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	1/14/1991
February	Active Ballot Club	11C	Joint Fundraiser	20,000.00	2/15/1991
February	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	2/19/1991
February	IBEW COPE	11C	Joint Fundraiser	1,500.00	2/1/1991
March	Active Ballot Club	11C	Joint Fundraiser	20,000.00	3/22/1991
March	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	3/20/1991
March	IBEW COPE	11C	Joint Fundraiser	1,500.00	3/1/1991
March	IBEW COPE	11C	Joint Fundraiser	1,500.00	3/28/1991
March	AFT COPE	11C	Joint Fundraiser	20,000.00	3/14/1991
April	Active Ballot Club	11C	Joint Fundraiser	20,000.00	4/19/1991
April	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	4/26/1991
April	IBEW COPE	11C	Joint Fundraiser	1,500.00	4/5/1991
April	AFT COPE	11C	Joint Fundraiser	20,000.00	4/22/1991
April	Carpenters CLIC	11C	Joint Fundraiser	4,000.00	4/15/1991
April	UAW-V-CAP	11C	Joint Fundraiser	20,000.00	4/15/1991
May	Active Ballot Club	11C	Joint Fundraiser	20,000.00	5/16/1991
May	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	5/24/1991
May	IBEW COPE	11C	Joint Fundraiser	1,500.00	5/6/1991
May	AFT COPE	11C	Joint Fundraiser	20,000.00	5/3/1991
May	BCT Intl Union PAC	11C	Joint Fundraiser	2,000.00	5/10/1991
May	UAW-V-CAP	11C	Joint Fundraiser	20,000.00	5/20/1991
June	Active Ballot Club	11C	Joint Fundraiser	20,000.00	6/21/1991
June	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	6/20/1991
June	IBEW COPE	11C	Joint Fundraiser	1,500.00	6/7/1991
June	AFT COPE	11C	Joint Fundraiser	20,000.00	6/5/1991
June	UAW-V-CAP	11C	Joint Fundraiser	20,000.00	6/17/1991
July	Active Ballot Club	11C	Joint Fundraiser	20,000.00	7/12/1991
July	IBEW COPE	11C	Joint Fundraiser	1,500.00	7/26/1991
July	AFT COPE	11C	Joint Fundraiser	20,000.00	7/16/1991
July	UAW-V-CAP	11C	Joint Fundraiser	20,000.00	7/25/1991
August	Active Ballot Club	11C	Joint Fundraiser	20,000.00	8/15/1991
August	IBEW COPE	11C	Joint Fundraiser	1,500.00	8/21/1991
August	UAW-V-CAP	11C	Joint Fundraiser	20,000.00	8/26/1991
August	BCT Intl Union PAC	12	Transfer	357.94	8/15/1991
September	Active Ballot Club	11C	Joint Fundraiser	20,000.00	9/6/1991
September	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	9/3/1991
September	IBEW COPE	11C	Joint Fundraiser	1,500.00	9/9/1991

October	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	10/7/1991
October	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	10/23/1991
October	IBEW COPE	11C	Joint Fundraiser	1,500.00	10/22/1991
October	Campaign Fund of the Allied Industrial Workers	11C	Joint Fundraiser	10,525.80	10/10/1991
October	UAW-V-CAP	11C	Joint Fundraiser	1,250.00	10/29/1991
November	Active Ballot Club	11C	Joint Fundraiser	20,000.00	11/1/1991
November	Active Ballot Club	11C	Joint Fundraiser	20,000.00	11/27/1991
November	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	11/19/1991
November	IBEW COPE	11C	Joint Fundraiser	1,500.00	11/18/1991
November	Voice of the Electorate OPEIU	11C	Joint Fundraiser	20,966.16	11/21/1991
December	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	12/30/1991
December	IBEW COPE	11C	Joint Fundraiser	1,500.00	12/6/1991
January	Active Ballot Club	11C	Joint Fundraiser	20,000.00	1/24/1992
January	IBEW COPE	11C	Joint Fundraiser	1,500.00	1/21/1992
January	ILGWU Campaign Committee	11C	Joint Fundraiser	2,800.00	1/16/1992
February	IBEW COPE	11C	Joint Fundraiser	1,500.00	2/18/1992
February	Active Ballot Club	11C	Joint Fundraiser	20,000.00	2/24/1992
March	IBEW COPE	11C	Joint Fundraiser	1,500.00	3/10/1992
March	ILGWU Campaign Committee	11C	Joint Fundraiser	5,200.00	3/16/1992
April	IBEW COPE	11C	Joint Fundraiser	1,500.00	4/9/1992
May	IBEW COPE	11C	Joint Fundraiser	1,500.00	5/11/1992
May	UAW-V-CAP	11C	Joint Fundraiser	25,000.00	5/11/1992
May	BCT Intl Union PAC	11C	Joint Fundraiser	500.00	5/13/1992
May	ILGWU Campaign Committee	11C	Joint Fundraiser	2,600.00	5/4/1992
June	IBEW COPE	11C	Joint Fundraiser	1,500.00	6/4/1992
June	UAW-V-CAP	11C	Joint Fundraiser	25,000.00	6/15/1992
June	ILGWU Campaign Committee	11C	Joint Fundraiser	2,600.00	6/4/1992
June	ILGWU Campaign Committee	11C	Joint Fundraiser	2,600.00	6/16/1992
July	IBEW COPE	11C	Joint Fundraiser	1,500.00	7/27/1992
July	ILGWU Campaign Committee	11C	Joint Fundraiser	2,600.00	7/20/1992
August	IBEW COPE	11C	Joint Fundraiser	1,500.00	8/27/1992
August	UAW-V-CAP	11C	Joint Fundraiser	148.83	8/3/1992
August	UAW-V-CAP	11C	Joint Fundraiser	297.37	8/27/1992
August	ILGWU Campaign Committee	11C	Joint Fundraiser	2,600.00	8/20/1992
August	Campaign Fund of the Allied Industrial Workers	11C	Joint Fundraiser	11,858.90	8/31/1992
September	IBEW COPE	11C	Joint Fundraiser	1,500.00	9/8/1992
September	UAW-V-CAP	11C	Joint Fundraiser	25,000.00	9/9/1992
September	AFT COPE	11C	Joint Fundraiser	25,000.00	9/17/1992
September	ILGWU Campaign Committee	11C	Joint Fundraiser	2,600.00	9/22/1992
September	OPEIU Local #2 COPE	28C	Joint Fundraiser	73.56	9/10/1992
PreGeneral	OPEIU Local #2 COPE	28C	Joint Fundraiser	77.06	10/8/1992
PreGeneral	IBEW COPE	11C	Joint Fundraiser	1,500.00	10/8/1992
PreGeneral	UAW-V-CAP	11C	Joint Fundraiser	25,000.00	10/9/1992
PreGeneral	AFT COPE	11C	Joint Fundraiser	25,000.00	10/9/1992
PreGeneral	Active Ballot Club	11C	Joint Fundraiser	20,000.00	10/11/1992
Annual	Active Ballot Club	11C	Joint Fundraiser	20,000.00	10/30/1992
Annual	BCT Intl Union PAC	11C	Joint Fundraiser	500.00	10/30/1992
Annual	IBEW COPE	11C	Joint Fundraiser	5,000.00	11/18/1992
Annual	ILGWU Campaign Committee	11C	Joint Fundraiser	2,600.00	11/12/1992
Annual	ILGWU Campaign Committee	11C	Joint Fundraiser	2,600.00	11/19/1992
Annual	OPEIU Local #2 COPE	28C	Joint Fundraiser	79.81	11/20/1992
Annual	IBEW COPE	11C	Joint Fundraiser	1,500.00	12/14/1992
Annual	IBEW COPE	11C	Joint Fundraiser	3,000.00	12/30/1992
Annual	ILGWU Campaign Committee	11C	Joint Fundraiser	2,600.00	12/23/1992
Annual	Voice of the Electorate OPEIU	11C	Joint Fundraiser	21,528.48	12/1/1992
Annual	Active Ballot Club	11C	Joint Fundraiser	20,000.00	12/3/1992
Annual	Active Ballot Club	11C	Joint Fundraiser	20,000.00	12/28/1992
Annual	OPEIU Local #2 COPE	28C	Joint Fundraiser	77.06	12/7/1992



FEDERAL ELECTION COMMISSION

105 K STREET NW  
WASHINGTON, DC 20463

June 8, 1979

Mr. George Meany, Chairman  
AFL-CIO COPE PCC  
815 Sixteenth Street, N.W.  
Washington, D.C. 20006

Dear Mr. Meany:

Attached for your information is a copy of the final audit report of AFL-CIO COPE PCC which was approved by the Commission in public session on June 7, 1979.

If you have any questions concerning the report, please contact Fred Eiland of the Press Office (523-4065) or Joann McSorley of the Audit Division at (523-4155).

Sincerely,

*Joseph F. Stoltz*  
Robert J. Costa  
Assistant Staff Director  
for the Audit Division

Attachment as stated

cc: Mr. Lane Kirkland, Treasurer

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED



ATTACHMENT A

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## FEDERAL ELECTION COMMISSION

1275 STREET NW  
WASHINGTON, DC 20563

### REPORT OF THE AUDIT DIVISION ON THE AFL-CIO COPE PCC

#### I. Background

##### A. Overview

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This report is based on an audit of the American Federation of Labor and Congress of Industrial Organizations Committee on Political Education Political Contribution Committee (AFL-CIO COPE PCC) ("the Committee"), undertaken by the Audit Division of the Federal Election Commission in accordance with the Commission's audit policy to determine whether there has been compliance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The audit was conducted pursuant to Section 438(a)(8) of Title 2 of the United States Code which directs the Commission to make from time to time audits and field investigations with respect to reports and statements filed under the provisions of the Act.

The Committee registered with the United States House of Representatives on April 7, 1972. The primary function of the Committee on Political Education's Political Contribution Committee is that of contributing funds to candidates seeking federal office.

The audit covered the period January 1, 1975 through June 30, 1977, the final coverage date of the latest report filed by the Committee at the time of the audit. The Committee reported opening cash at January 1, 1975 of \$12,822.75, total receipts for the period of \$2,036,944.61; total expenditures for the period of \$2,068,974.83; and a closing cash balance on June 30, 1977 of \$30,792.53.

This audit report is based on documents and working papers which support each of the factual statements. They form part of the record upon which the Commission based its decisions on the matters in the report and were available to Commissioners and appropriate staff for review.



B. Key Personnel

The principal officers of the Committee for the period of the audit were George Meany, Chairman and Lane Kirkland, Secretary-Treasurer.

C. Scope

The audit included such tests as verification of total reported receipts and expenditures and individual transactions; review of required supporting documentation; analysis of Committee debts and obligations; and, such other audit procedures as deemed necessary under the circumstances.

II. Auditor's Statement and Description of Findings

It is the opinion of the Audit staff, based upon examination of the reports and statements filed and records presented, that the AFL-CIO COPE PCC has not conducted its activities in compliance with the Federal Election Campaign Act and that the reports and statements filed by the Committee did not fairly present the financial activities of the Committee for the period covered by the audit.

A. Committee Receipts

During the course of the audit, we determined that the AFL-CIO COPE PCC employs four (4) methods for the solicitation, transmittal and receipt of voluntary contributions.

1) AFL-CIO headquarters staff personnel who are members have authorized payroll deductions of voluntary contributions. The PCC reports these receipts as either itemized or unitemized as necessary.

2) The Committee advises unions of the availability of PCC membership ticket booklets and buttons for the coming year's PCC fundraising drive. Unions respond and request to be provided a given number of booklets. Solicitations and collections are made specifically for the AFL-CIO COPE PCC and the contributor is provided with the ticket as a receipt. The contributions raised in this manner are accompanied by receipt booklet stubs as supporting documentation, forwarded to the PCC, and then reported by the PCC as unitemized receipts.

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The member union may permissibly solicit contributions in this manner and the individual soliciting is considered an agent of the AFL-CIO COPE PCC. However, in some cases (see Finding B), the voluntary contributions received for the benefit of the PCC were being deposited together with prohibited union treasury funds in labor organization accounts, and being held up to one year prior to their transfer to the PCC. As noted in Finding B, this practice is not acceptable.

The Commission determined on August 3, 1978 that the following procedures be employed when voluntary contributions are collected by members of the AFL-CIO and are transmitted to the AFL-CIO.

When a member or official of a reporting international, national or local union which in turn is a member of the AFL-CIO solicits contributions solely on behalf of the AFL-CIO by use of receipt booklets furnished by the AFL-CIO, the solicitor must either 1) forward the funds immediately to the AFL-CIO COPE PCC; or 2) within 10 days deposit the funds in a transmittal account (either procedure must be in accordance with the procedures outlined in Finding B.). In either event, the PCC is required to include and report these receipts on its next disclosure report.

3) The PCC conducts what appear to be joint fundraising efforts with member unions. Our review of Committee records indicated at least one (1) instance where the joint fundraising efforts on the part of the PCC and a national union consisted solely of literature supplied by the national union to its members indicating that a percentage of the monies collected for the union's political action committee would ultimately be forwarded to the PCC. In this instance, the union had not requested nor received PCC membership ticket booklets for distribution to its members. These funds were reported as unitemized contributions by the PCC, with no indication on the PCC disclosure reports that joint fundraising efforts were conducted. However, since the transmittal of the joint fundraising proceeds represent transfers of funds from the political Committees of the labor organization to the PCC, such transfers, regardless of amount, should be itemized by the PCC as required by Section 434(b)(4) of Title 2, United States Code.

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Accordingly, on August 3, 1978 the Commission determined that the following procedures be used when the AFL-CIO engages in joint fundraising activities with a member union.

In order for the solicitation to constitute a "joint fundraising effort" on the part of the PCC and the member union political committee the person soliciting the contribution must, among other requirements under Section 114.5 of the Commission's Regulations (11 CFR 114.5), inform the member at the time of the solicitation of the purpose of the fund (i.e., that a portion of the funds will be sent to the AFL-CIO COPE PCC). Funds solicited in this manner which are transferred from the member union political committee to the PCC are not subject to the contribution limitations (see 2 U.S.C. 441a(a)(5)(A)). Funds which are not raised under the conditions set forth above are not joint fundraising efforts and are subject to the contribution limitations when transfers are made. When using this manner of solicitation and collection, 1) the political committee of the member union would report these funds as itemized or unitemized contributions when received; 2) the transfer out of funds from the member union political committee to the PCC would be labeled as a joint fundraising effort and reported as a transfer by the political committee of the member union on the next report; and 3) the PCC would then report these funds as transfers-in from the member union political committee on the next report and label each of these transfers "joint fundraising efforts."

4) The final method of solicitation and collection of voluntary contributions involves the transmittal of funds to the PCC with accompanying correspondence from the member union indicating that the funds represent voluntary contributions. No other supporting documentation was provided nor was there any indication that the PCC and member union had engaged in joint fundraising efforts. Therefore, the transfers from the political committee of the member union to the PCC would be limited to \$5,000 in any calendar year under the provisions of Section 441a(a)(2)(C) of Title 2, United States Code.

However, our review of Committee records indicated that at least one (1) transmittal of \$10,000 from a political fund without supporting documentation or indication of the source of the funds had been received by the PCC and reported as unitemized receipts. As noted in (3) above, the receipt of funds by the PCC from the political committees of the labor unions should be itemized as transfers regardless of amount.

On August 3, 1978, the Commission determined that the following procedures should be used when the member union collects on behalf of its political committee and forwards the funds to the AFL-CIO COPE PCC.

Each transmittal must be reported as a transfer out by the local, national or international union and a transfer in by the PCC. Since "all of the political committees set up by the AFL-CIO and all its State and local central bodies are treated as a single political committee" (House Report 94-1057, 94th Congress 2nd Session, page 58), the state and local AFL-CIO central bodies may collect monies and transfer unlimited amounts to the PCC. However, since the House Report also states that "all of the political committees set up by a single international union and its local unions are treated as a single political committee" there is no per se affiliation between the PCC and the separate segregated funds of the international unions which are members of the AFL-CIO. Therefore, if the international union solicits money for its own political fund and does not inform the union member at the time of solicitation that a portion of the contribution is for the PCC, the transmittal from the international political committee to the PCC will not be viewed as the product of joint fundraising or direct solicitation, but rather it will be deemed a transfer from one (1) multicandidate political committee to another and must be within the \$5,000 annual limitation established by 2 U.S.C. 441a(a)(2)(C).

The Commission further requested that the Committee implement the procedures outlined in (2), (3) and (4) above and amend its reports filed from January 1, 1975 through the present to itemize all transfers including those which are the result of joint fundraising efforts.

#### Recommendation

On October 10, 1978, the Committee submitted to the Audit staff written procedures to be implemented by the Committee in order to comply with the above requirements. Also, the Committee has filed the requested amended reports on October 10, 1978 and revised amendments on January 16 and 18, 1979 itemizing all transfers including those that resulted from joint fundraisers. Since the Committee has fully complied with the recommendations of the Commission, we recommend that no further action is necessary.

B. Receipt of Funds on Union Accounts

Section 441b of Title 2 of the United States Code provides for the establishment, administration, and solicitation of contributions to a separate segregated fund to be utilized for political purposes by a labor organization. Section 437b(a)(2) requires, in part, that the treasurer of each political committee designate one or more national or State banks as campaign depositories of such committee, while Section 433(b)(9) of Title 2 of the United States Code requires that a listing of all banks and repositories used by the Committee must be disclosed.

Our review of Committee's records indicated that a substantial number of the voluntary contributions received by various labor organizations for the benefit of the PCC apparently were being deposited in union accounts and subsequently transferred to the PCC. It should be noted that due to the type of documentation maintained by the Committee for receipts, it was not always possible to determine the source of funds as either a political contribution fund or union treasury fund. However, at least 140 items of this nature ranging in dollar amount from \$2.00 to \$15,000.00 were noted during the period audited.

The Commission determined on August 3, 1978 that the Committee advise local labor organizations to 1) forward the funds immediately (by means other than through a personal, union or other prohibited account) to the AFL-CIO COPE PCC which must deposit the funds within 10 days or 2) within 10 days deposit voluntary contributions in "transmittal" accounts which shall be used solely for the purpose of transmitting voluntary contributions to the AFL-CIO COPE PCC. Accounts from which expenditures are made for any purpose other than the transfer of funds to the PCC cannot be transmittal accounts. Further, the PCC is required to include these receipts on its next disclosure report.

Recommendation

On October 10, 1978, the Committee submitted written procedures advising local labor organizations of this provision and guidelines for implementation. Therefore, it is the opinion of the Audit staff that no further action in this matter is necessary.

C. Transfer of Funds from AFL-CIO COPE Educational Account

Section 441b of Title 2 of the United States Code prohibits a union general treasury from making transfers to a separate segregated fund such as the AFL-CIO COPE Political Contributions Committee (PCC).

After examination of the Committee's records and reports, and conversations with the Committee's Counsel and Accountant, we verified that the AFL-CIO COPE PCC, a separate segregated fund, transferred monies to the AFL-CIO COPE Educational Fund, a general treasury fund, when the PCC had excess funds.

Also, there were occasions when the Educational Fund transferred funds to the PCC. We verified that during the period from January 1, 1975, through June 30, 1977, the PCC transferred \$322,000 to the Educational Fund, while \$185,000 from the Educational Fund was transferred to the PCC account. Committee officials advised that the Educational Fund contains union treasury funds as well as voluntary contributions. (However, this statement was not verified since the audit of the Educational Fund was not within the scope of our audit as directed by the Commission).

Although the transfers of funds from the PCC to the Educational Account were not in violation of the Act, the transfers from the Educational Account to the PCC did constitute a violation. Since the Educational Fund is comprised of various sources of monies, a transfer from this account would be comprised in whole or in part of other than voluntary contributions, because monies are fungible once they are deposited in the same account.

As a result of the audit, on October 20, 1977, the Commission found reasonable cause to believe that the Committee had violated Section 441b. Subsequently, the Commission unsuccessfully attempted to enter into a conciliation agreement and, as a result, filed suit against the AFL-CIO COPE on December 16, 1977.

On June 12, 1978, the U.S. District Court for the District of Columbia issued a judgment in favor of the Commission as follows:

107016130

1) The transfers of money from AFL-CIO COPE Educational Fund to the AFL-CIO COPE PCC, a separate segregated fund, violated 2 U.S.C. 441b;

2) The AFL-CIO was enjoined at any time in the future from transferring any money from general treasury funds or from the AFL-CIO COPE Educational Fund to the separate segregated fund of the PCC, except as set forth in the single transfer order below;

3) The defendant was ordered to pay a civil penalty in the amount of \$10,000 pursuant to 2 U.S.C. 437g(a)(1)(7) and it was further ordered that the AFL-CIO COPE Educational Fund should transfer \$312,000 to the AFL-CIO COPE PCC forthwith.

On August 15, 1978, the AFL-CIO filed notice of appeal from the portion of the order which directed the defendant to pay a civil penalty in the amount of \$10,000. This action is currently pending in the United States Court of Appeals for the District of Columbia Circuit.

#### D. Transfer of Funds

As stated in C above, Section 441b of Title 2 of the United States Code prohibits a union general treasury from making transfers to a separate segregated fund.

In addition to the funds discussed in C above, a nominal amount of funds (\$8,031) that represents voluntary contributions previously deposited in the Educational Fund has been transferred from the Educational Fund to the PCC. This situation is a result of the PCC receiving contributions from local labor organizations but having no indication of the source of the funds. Since the PCC was not certain that the funds represented voluntary contributions, the funds were deposited in the Educational Fund account until information was received showing that they represented voluntary contributions to the PCC which for convenience were transferred through the local labor organization accounts. Upon making that determination, the exact amounts in question were transferred from the Educational Fund to the PCC.

On August 3, 1978, the Commission determined that in the future the Committee should deposit questionable contributions into the PCC account pursuant to Part 103.3(b)(2) of the Commission's regulations which allows the Committee a reasonable period of time to determine the legality of the contributions.

Recommendation

The Committee submitted to the Audit staff on October 10, 1978, a written directive to Committee personnel advising of this procedure. Therefore, it is the opinion of the Audit staff that no further action in this matter is necessary.

01073161132



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

August 8, 1978

Mr. Lane Kirkland, Treasurer  
AFL-CIO COPE PCC  
815 Sixteenth Street, N.W.  
Washington, D.C. 20006

Dear Mr. Kirkland:

The attached is to formally advise you of the findings and recommendations of the Audit staff resulting from the audit of the AFL-CIO COPE PCC. These matters were discussed with your staff at the conclusion of the fieldwork on August 25, 1977.

You are requested to comply with the stated recommendation in Finding A of the attached and file amended reports within 30 days of receipt of this letter. Further, you are requested to implement the procedures as outlined in Finding A of the attached within 60 days of receipt of this letter. After expiration of the time period specified and the receipt of your response, the Audit staff will present a final audit report to the Commission for approval and subsequent public release. Efforts to comply with the recommendations will be noted in the report when presented.

Should you not respond adequately to these recommendations within the time specified above, in accordance with Commission policy, the matter will be referred to the Commission's Office of General Counsel with a recommendation that an order or subpoena be prepared requiring compliance with the staff recommendations.

If you have any questions regarding these matters, please do not hesitate to contact Joanne McSorley at (202) 523-4155.

Sincerely,

Robert J. Costa  
Assistant Staff Director  
for the Audit Division

Attachment as stated

cc: Mr. George Meany,  
Chairman



CERTIFIED MAIL:  
RETURN RECEIPT REQUESTED

RECEIVED

AUG 09 1978

PRESIDENT'S OFFICE

ATTACHMENT B

## Audit Findings and Recommendations

### A. Committee Receipts

During the course of the audit, we determined that the AFL-CIO COPE PCC employs four (4) methods for the solicitation, transmittal and receipt of voluntary contributions.

1) AFL-CIO headquarters staff personnel who are members have authorized payroll deductions of voluntary contributions. The PCC reports these receipts as either itemized or unitemized as necessary.

2) The Committee advises unions of the availability of PCC membership ticket booklets and buttons for the coming year's PCC fundraising drive. Unions respond and request to be provided a given number of booklets. Solicitations and collections are made specifically for the AFL-CIO COPE PCC and the contributor is provided with the ticket as a receipt. The contributions raised in this manner are accompanied by receipt booklet stubs as supporting documentation, forwarded to the PCC, and then reported by the PCC as unitemized receipts.

The member union may permissibly solicit contributions in this manner and the individual soliciting is considered an agent of the AFL-CIO COPE PCC. However, in some cases (see Finding B), the voluntary contributions received for the benefit of the PCC were being deposited together with prohibited union treasury funds in labor organization accounts, and being held up to one year prior to their transfer to the PCC. As noted in Finding B, this practice is not acceptable.

Therefore, the Audit staff recommends that the following procedures be employed when voluntary contributions are collected by members of the AFL-CIO and are transmitted to the AFL-CIO.

When a member or official of an international, national or local union which in turn is a member of the AFL-CIO solicits contributions solely on behalf of the AFL-CIO by use of receipt booklets furnished by the AFL-CIO, the solicitor must either 1) forward the funds immediately (by means other than through a personal, union or other prohibited account) to the AFL-CIO COPE PCC which must deposit the funds within 10 days of receipt; or 2) within 10 days deposit the funds in a transmittal account which shall be used solely for the purpose of transmitting voluntary contributions to the AFL-CIO COPE PCC. Accounts from which expenditures are made for any purpose other than the transfer of funds to the PCC cannot be transmittal accounts. In either event, the PCC is required to include and report these receipts on its next disclosure report.

3) The PCC conducts what appear to be joint fundraising efforts with member unions. Our review of Committee records indicated at least one (1) instance where the joint fundraising efforts on the part of the PCC and a national union consisted solely of literature supplied by the national union to its members indicating that a percentage of the monies collected for the union's political action committee would ultimately be forwarded to the PCC. In this instance, the union had not requested nor received PCC membership ticket booklets for distribution to its members. These funds were reported as unitemized contributions by the PCC, with no indication on the PCC disclosure reports that joint fundraising efforts were conducted. However, since the transmittal of the joint fundraising proceeds represent transfers of funds from the political Committees of the labor organization to the PCC, such transfers, regardless of amount, should be itemized by the PCC as required by Section 434(b)(4) of Title 2, United States Code.

Accordingly, the Audit staff recommends that the following procedures be used when the AFL-CIO engages in joint fundraising activities with a member union.

In order for the solicitation to constitute a "joint fundraising effort" on the part of the PCC and the member union political committee the person soliciting the contribution must, among other requirements under Section 114.5 of the Commission's Regulations (11 CFR 114.5), inform the member at the time of the solicitation of the purpose of the fund (i.e., that a portion of the funds will be sent to the AFL-CIO COPE PCC). Funds solicited in this manner which are transferred from the member union political committee to the PCC are not subject to the contribution limitations (see 2 U.S.C. 441a(a)(5)(A)). Funds which are not raised under the conditions set forth above are not joint fundraising efforts and are subject to the contribution limitations when transfers are made. When using this manner of solicitation and collection, 1) the political committee of the member union would report these funds as itemized or unitemized contributions when received; 2) the transfer out of funds from the member union political committee to the PCC would be labeled as a joint fundraising effort and reported as a transfer by the political committee of the member union on the next report; and 3) the PCC would then report these funds as transfers-in from the member union political committee on the next report and label each of these transfers "joint fundraising efforts."

4) The final method of solicitation and collection of voluntary contributions involves the transmittal of funds to the PCC with accompanying correspondence from the member union indicating that the funds represent voluntary contributions. No other supporting documentation was provided nor was there any indication that the PCC and member union had engaged in joint fundraising efforts. Therefore, the transfers from the political committee of the member union to the PCC would be limited to \$5,000 in any calendar year under the provisions of Section 441a(a)(2)(C) of Title 2, United States Code.

However, our review of Committee records indicated that at least one (1) transmittal of \$10,000 from a political fund without supporting documentation or indication of the source of the funds had been received by the PCC and reported as unitemized receipts. As noted in (3) above, the receipt of funds by the PCC from the political committees of the labor unions should be itemized as transfers regardless of amount.

The Audit staff recommends that the following procedures be used when the member union collects on behalf of its political committee and forwards the funds to the AFL-CIO COPE PCC.

Each transmittal must be reported as a transfer out by the local, national or international union and a transfer in by the PCC. Since "all of the political committees set up by the AFL-CIO and all its State and local central bodies are treated as a single political committee" (House Report 94-1057, 94th Congress 2nd Session, page 58), the state and local AFL-CIO central bodies may collect monies and transfer unlimited amounts to the PCC. However, since the House Report also states that "all of the political committees set up by a single international union and its local unions are treated as a single political committee" there is no per se affiliation between the PCC and the separate segregated funds of the international unions which are members of the AFL-CIO. Therefore, if the international union solicits money for its own political fund and does not inform the union member at the time of solicitation that a portion of the contribution is for the PCC, the transmittal from the international political committee to the PCC will not be viewed as the product of joint fundraising or direct solicitation, but rather it will be deemed a transfer from one (1) multicandidate political committee to another and must be within the \$5,000 annual limitation established by 2 U.S.C. 441a(a)(2)(C).

The Audit Division further recommends that the Committee implement the procedures outlined in (2), (3) and (4) above within 60 days of receipt of this report. Further, we recommend that the Committee amend its reports filed from January 1, 1975 through the present to itemize all transfers including those which are the result of joint fundraising efforts within 30 days of receipt of this report.

B. Receipt of Funds on Union Accounts

Section 441b of Title 2 of the United States Code provides for the establishment, administration, and solicitation of contributions to a separate segregated fund to be utilized for political purposes by a labor organization. Section 437b(a)(2) requires, in part, that the treasurer of each political committee designate one or more national or State banks as campaign depositories of such committee, while Section 433(b)(9) of Title 2 of the United States Code requires that a listing of all banks and repositories used by the Committee must be disclosed.

Our review of Committee's records indicated that a substantial number of the voluntary contributions received by various labor organizations for the benefit of the PCC apparently were being deposited in union accounts and subsequently transferred to the PCC. It should be noted that due to the type of documentation maintained by the Committee for receipts, it was not always possible to determine the source of funds as either a political contribution fund or union treasury fund. However, at least 140 items of this nature ranging in dollar amount from \$2.00 to \$15,000.00 were noted during the period audited.

Recommendation

It is our recommendation that the Committee be requested to advise local labor organizations to 1) forward the funds immediately (by means other than through a personal, union or other prohibited account) to the AFL-CIO COPE PCC which must deposit the funds within 10 days or 2) within 10 days deposit voluntary contributions in "transmittal" accounts which shall be used solely for the purpose of transmitting voluntary contributions to the AFL-CIO COPE PCC. Accounts from which expenditures are made for any purpose other than the transfer of funds to the PCC cannot be transmittal accounts. Further, the PCC is required to include these receipts on its next disclosure report.

C. Transfer of Funds from AFL-CIO COPE Educational Account

Section 441b of Title 2 of the United States Code prohibits a union general treasury from making transfers to a separate segregated fund such as the AFL-CIO COPE Political Contributions Committee (PCC).

After examination of the Committee's records and reports, and conversations with the Committee's Counsel and Accountant, we verified that the AFL-CIO COPE PCC, a separate segregated fund, transferred monies to the AFL-CIO COPE Educational Fund, a general treasury fund, when the PCC had excess funds.

Also, it was noted; that there were occasions when the Educational Fund transferred funds to the PCC. We verified that during the period from January 1, 1975, through June 30, 1977, the PCC transferred \$322,000 to the Educational Fund, while \$185,000 from the Educational Fund was transferred to the PCC account. Committee officials advised that the Educational Fund contains union treasury funds as well as voluntary contributions. (However, this statement was not verified since the audit of the Educational Fund was not within the scope of our audit as directed by the Commission).

Although the transfers of funds from the PCC to the Educational Account were not in violation of the Act, in our opinion the transfers from the Educational Account to the PCC does constitute a violation. Since the Educational Fund is comprised of various sources of monies, a transfer from this account would be comprised in whole or in part of other than voluntary contributions, because monies are fungible once they are deposited in the same account.

Recommendation

As a result of the audits, on October 20, 1977, the Commission found reasonable cause to believe that the Committee had violated Section 441b. Subsequently, the Commission unsuccessfully attempted to enter into a conciliation agreement and, as a result, filed suit against the AFL-CIO COPE on December 16, 1977.

On June 12, 1978, the U.S. District Court for the District of Columbia issued a judgment in favor of the Commission as follows:

1) the transfers of money from AFL-CIO COPE Educational Fund to the AFL-CIO COPE PCC, a separate segregated fund, violated 2 U.S.C. 441b;

2) The AFL-CIO was enjoined at any time in the future from transferring any money from general treasury funds or from the AFL-CIO COPE Educational Fund to the separate segregated fund of the PCC, except as set forth in the single transfer order below;

3) The defendant was ordered to pay a civil penalty in the amount of \$10,000 pursuant to 2 U.S.C. 437g(a)(1)(7) and it was further ordered that the AFL-CIO COPE Educational Fund should transfer \$312,000 to the AFL-CIO COPE PCC forthwith.

On June, -14, 1978, the Commission determined not to appeal the court decision in the case on June 12, 1978.

D. Transfer of Funds

As stated in C above, Section 441b of Title 2 of the United States Code prohibits a union general treasury from making transfers to a separate segregated fund.

In addition to the funds discussed in C above, a nominal amount of funds (\$8,031) that represents voluntary contributions previously deposited in the Educational Fund has been transferred from the Educational Fund to the PCC. This situation is a result of the PCC receiving contributions from local labor organizations but having no indication of the source of the funds. Since the PCC was not certain that the funds represented voluntary contributions, the funds were deposited in the Educational Fund account until information was received showing that they represented voluntary contributions to the PCC which for convenience were transferred through the local labor organization accounts. Upon making that determination, the exact amounts in question were transferred from the Educational Fund to the PCC.

Recommendation

It is the recommendation of the Audit staff that in the future the Committee deposit questionable contributions into the PCC account pursuant to Part 103.3(b)(2) of the Commission's Regulations which allows the Committee a reasonable period of time to determine the legality of the contributions.

E. Contributions in Excess of Limitations

Section 441a(a)(2)(A) of Title 2 of the United States Code states that no multicandidate political committee shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$5,000.

The Committee's accountant advised us during the entrance conference that the PCC has no system to check aggregate totals of contributions to candidates by AFL-CIO COPE PCC and its reported affiliated committees (state AFL-CIO Central committees). Therefore, we reviewed AFL-CIO COPE PCC and reported affiliated Committee reports and a Commission generated computer listing of candidates who received contributions from AFL-CIO COPE PCC and its affiliates between January 1, 1975 and December 31, 1976. Since the issue of affiliation was not specifically addressed until May 11, 1976 (the effective date of the 1976 amendments to the Act), and since it is uncertain what effect, if any, activity occurring prior to May 11, 1976 has on the 1976 limitations, the results of our review are presented based on two (2) interpretations.

First, if contributions made prior to May 11, 1976 are considered when viewing the 1976 limitations, nine (9) candidates received contributions in excess of \$5,000 per election from the AFL-CIO COPE PCC and five (5) reported affiliated Committees with at least one (1) of the contributions in each of the nine (9) instances occurring after May 11, 1976.

The second interpretation disregards all contributions made prior to May 11, 1976. This analysis reveals that AFL-CIO COPE PCC and four (4) affiliated Committees contributed to four (4) candidates in excess of \$5,000 per election.

Recommendation

This matter has been referred to the Office of General Counsel for their review and consideration.



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

September 7, 1977

Mr. Laurence Gold, Special Counsel  
AFL-CIO COPE PCC  
815 16th St.  
Washington, D.C. 20006

Dear Mr. Gold:

Per our conversation on Thursday, August 25th, enclosed are the two (2) schedules you requested. Schedule A lists voluntary contributions from other committees for which the AFL-CIO COPE PCC had not received supporting documentation. In this case, supporting documentation for other similar contributions had consisted of ticket receipt booklets and/or correspondence from committees requesting same.

Schedule B lists contributions from AFL-CIO COPE PPC and affiliated state committees to two (2) candidates. The combined total contributions for either the primary or general elections appears to exceed the limitations imposed by Section 441a (a) (2) (A) of Title 2 of the United States Code.

If you have any questions and/or comments concerning the above, please call me at 523-4155.

Sincerely,

  
Joanne McSorley  
(Acting) Audit Manager

cc: W. Bartkin, Acting Treasurer  
R. J. Costa, (Acting) Asst. Staff Director  
B. Litchfield, Office of General Counsel

Enclosure as stated



ATTACHMENT C

Schedule A

Contributions Lacking Supporting Documentation

<u>Name</u>	<u>Amount</u>	<u>Date of</u>
International Ladies Garment Workers Union	\$40,000	5/14/76
Industrial Union Dept. Voluntary Found	\$10,000	5/14/76
American Federation of Teachers COPE	\$15,000 \$15,000	9/10/76 10/21/76
Transport Workers Union	\$15,000	9/10/76
VOTE - COPE	\$50,000	10/1/76
United Assc. of Journeymen and Apprentices of the Plumbing and Pipefitting Industry	\$ 5,379	10/6/76
American Federation of Musicians	\$10,000	10/13/76
Ohio State Assc. of the United Assc. of Journeymen and Apprentices of the Plumbing and Pipefitting Industry	\$ 7,500	10/13/76
Pipeliners Voluntary Fund	\$14,000	10/13/76
United Rubber, Cork, Linoleum and Plastic Workers	\$25,000	10/20/76
Amalgamated Meat Cutters COPE	\$ 8,000	12/17/76
International Union of Electrical, Radio and Machine Workers	\$10,000	4/15/17

Schedule B

Contributions to Candidates from AFL-CIO COPE PCC and  
Affiliated Committees

<u>Name</u>	<u>Amount</u>	<u>Date</u>
Contributions to Senator John Tunney:		
AFL-CIO COPE PCC	\$5,000	6/11/76
AFL-CIO COPE PCC	\$5,000	8/10/76
Central Labor Council of Santa Clara Council, AFL-CIO COPE	\$ 200	11/19/76
Date of Election 6/8/76		
Contributions to Senator D.P. Moynihan:		
AFL-CIO COPE PCC	\$5,000	7/8/76
AFL-CIO COPE PCC	\$5,000	10/7/76
New York State AFL-CIO	\$ 624	30 day Report
Date of Election 9/14/76		

# AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS

EXECUTIVE COUNCIL  
**GEORGE MEANY**                      **LANE KIRKLAND**  
PRESIDENT                              SECRETARY-TREASURER

PAUL HALL  
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JAMES T. WOODSWORTH  
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JERRY BRINE  
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ALBERT SHAPIRO  
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EDWARD J. HANLEY  
WILLIAM H. MCCANNAN  
DAVID A. FITZMAURICE

JOHN W. LYONS  
C. L. O'NEIL  
FREDRICK O'NEAL  
S. FRANK HARTERT  
AL H. CHESSAR  
MURRAY H. FINLEY  
SOL STEIN  
SON C. CHAIRIN  
ANGELO JOSCO  
J. C. TURNER  
KENNETH T. BLAYLOCK



815 SIXTEENTH STREET, N.W.  
WASHINGTON, D.C. 20006

(202) 637-8000

October 26, 1977

Ms. Joanne McSorley, Acting Audit Manager  
Audit Division  
Federal Election Commission  
1325 K Street, N. W.  
Washington, D. C. 20463

Dear Ms. McSorley:

This is in reply to your inquiry regarding "voluntary contributions from other committees for which the AFL-CIO COPE PCC had not received supporting documentation", and the accompanying list of contributions headed "Schedule A". After reviewing our books and records we have ascertained the following:

First, the contribution to AFL-CIO COPE PCC from the International Ladies' Garment Workers Union political fund in the amount of \$40,000.00, deposited May 14, 1976, was made by a check in that amount signed and mailed on May 11, 1976. That contribution was accepted in light of the prevailing rule that an agreement to pay a sum of money is complete as of the time the check is mailed. See Attachment 1 to this letter.

Second, the contribution to AFL-CIO COPE PCC from the Industrial Union Department Voluntary Fund in the amount of \$10,000.00, deposited May 14, 1976, was made by a check in that amount delivered by hand to COPE on May 10, 1976. That check was deposited four days later purely as a matter of COPE's convenience. See Attachment 2 to this letter.

Third, the following unions listed on Schedule A were supplied 1976 COPE receipt books in the quantities noted in parenthesis after their names:

PAGE 2

Transport Workers Union (13,000 COPE receipt books)

United Association, the Ohio State United  
Association, etc. and Pipefitters Voluntary  
Fund (28,000 COPE receipt books)

United Rubber Workers (15,000 COPE receipt books)

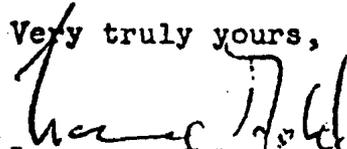
Amalgamated Meat Cutters COPE (40,000 COPE receipt books)

International Union of Electrical, Radio the  
· (1,000 COPE receipt books plus 735 books sent  
directly to IUE local unions). See Attachments  
3-7 to this letter.

Fourth, with respect to the contributions from the American Federation of Teachers' COPE political committee, Conference Report No. 94-1057, 94th Cong., 2d Sess., p. 58, states that the Act "permit[s] political committees which solicit contributions in their joint names, and on the understanding that the money collected through the joint fundraising effort will be divided among the participating committees, to make such a division". The AFT political committee is one of the many committees of international unions affiliated with the AFL-CIO that the Federation has permitted to use the COPE name originated by the AFL-CIO, and that has historically transferred to the AFL-CIO a proportion of the voluntary moneys collected by the union. Given the use of the common name, COPE, and this history, all the moneys collected by these committees comes within the 1976 FECA amendments' definition of a joint fundraising effort. Further, accompanying this letter please find Attachment 8 which includes the basic fundraising brochure used in 1976 and a selection of AFT publications of that year, all making the point that the AFT's fundraising effort was directed to raising voluntary contributions for the AFT and AFL-CIO COPEs.

Finally, it does appear that we were in error in accepting more than \$5,000.00 from the American Federation of Musicians Political Fund. We would appreciate the opportunity to meet with you and the Commission's compliance staff to work out an appropriate means of rectifying that error.

Very truly yours,

  
Laurence Gold  
Special Counsel

RECEIVED

JAN 17 1978



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

COPE

January 16, 1978

Mr. Laurence Gold, Special Counsel  
AFL-CIO COPE  
815 - 16th Street, N.W.  
Washington, D.C. 20006

Dear Mr. Gold:

After reviewing the information we requested regarding voluntary contributions to AFL-CIO COPE PCC, it appears that additional information is required to further clarify the following receipts (see Attachments I and II for previous correspondence).

First, the receipt of \$50,000 on 10/1/76 from VOTE-COPE was not addressed in your letter of October 26, 1977.

Second, voucher #17279 presented for the "Amalgamated Meat Cutters COPE", is addressed to the "Amalgamated Meat Cutters and Butcher Workmen". Are these the same organizations? This question arose because of the quantity (37,500) of \$2 booklets sent to the "Amalgamated Meat Cutters & Butcher Workmen" and the subsequent return of contributions from the "Amalgamated Meat Cutters COPE" (\$8,000 received on 12/17/76) (see Attachment III).

Third, voucher #16691 presented for the "United Rubber Workers" indicates 2,200 books were sent and your letter indicates 15,000 COPE receipt books were sent. However, my letter of September 7, 1977 requested information concerning the "United Rubber, Cork, Linoleum and Plastic Workers" contribution of \$25,000 on 10/20/76. Please clarify this matter (see Attachment IV).

Finally, vouchers to the "International Union of Electrical, Radio, and Machine Workers" indicate that 1,735 \$2 booklets were sent to the COPE and locals. This would indicate that \$3,470 would be the maximum contributions returned. However, receipts of \$10,000 were received on 4/15/77. Please explain this difference (see Attachment V).



Mr. Laurence Gold,  
Special Counsel  
AFL-CIO COPE

Page 2

We would appreciate your response to these questions within 5 days of receipt of this letter. If you have any questions and/or comments concerning the above, please call me at 523-4155.

Sincerely,

  
Joanne McSorley  
Audit Manager

Enclosures as stated

cc: W. Bartkin, Acting Treasurer  
R. Costa, Assistant Staff Director  
B. Litchfield, Office of General Counsel

CERTIFIED MAIL:  
RETURN RECEIPT REQUESTED

TT

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 1 for  
 LINE NUMBER 11C  
 (Use separate schedule(s) for each  
 category of the Detailed  
 Summary Page)

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Name of Committee (in Full) AFL-CIO COPE POLITICAL CONTRIBUTIONS COMMITTEE			
<b>A. Full Name, Mailing Address and ZIP Code</b> Active Ballot Club (UFCW) 1775 K Street, N.W. Washington, D.C. 20006	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Joint Fundraising Transfer	12/15/86	20,006.54
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$
<b>B. Full Name, Mailing Address and ZIP Code</b> ILGWU Campaign Committee 1710 Broadway New York, New York 10019	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Joint Fundraising Transfer	12/1/86 12/15/86	3,400.00 3,400.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$
<b>C. Full Name, Mailing Address and ZIP Code</b> CWA COPE - PCC 1925 K Street, N.W. Washington, D.C. 20006	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Joint Fundraising Transfer	12/1/86	15,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$
<b>D. Full Name, Mailing Address and ZIP Code</b> IBEW COPE 1125 15th Street, N.W. Washington, D.C. 20005	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Joint Fundraising Transfer	12/11/86	25,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$
<b>E. Full Name, Mailing Address and ZIP Code</b> OPEIU Local #2 COPE 815 16th Street, N.W. Washington, D.C. 20006	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Joint Fundraising Transfer	12/29/86	365.71
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$
<b>F. Full Name, Mailing Address and ZIP Code</b>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$
<b>G. Full Name, Mailing Address and ZIP Code</b>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$
<b>SUBTOTAL</b> of Receipts This Page (optional) . . . . .			
<b>TOTAL</b> This Period (last page this line number only) . . . . .			67,172.25