



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20461

THIS IS THE END OF TCR # 1146 merged into  
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FEDERAL ELECTION COMMISSION

MUR 1150

- Conciliation Attempts - protected from disclosure by 5 U.S.C. §437g (a)(4)(B)

{552(b)(5)} Commissioner's handwritten comment sheets re: objections & routing slips

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- |                                     |   |                          |  |
|-------------------------------------|---|--------------------------|--|
| <input type="checkbox"/>            | (1) Classified Information                                | <input type="checkbox"/> | (6) Personal privacy                             |
| <input type="checkbox"/>            | (2) Internal rules and practices                          | <input type="checkbox"/> | (7) Investigatory files                          |
| <input checked="" type="checkbox"/> | (3) Exempted by other statute                             | <input type="checkbox"/> | (8) Banking Information                          |
| <input type="checkbox"/>            | (4) Trade secrets and commercial or financial information | <input type="checkbox"/> | (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> | (5) Internal Documents                                    |                          |  |

Signed Carolyn Weeder  
date Aug. 27, 81

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 14, 1981

Mr. Donald P. MacDonald  
Hornbein, MacDonald, Fattor  
and Buckley  
1900 Colorado State Bank Building  
Denver, Colorado 80202

Re: MUR 1150

Dear Mr. MacDonald:

On August 11, 1981, the Commission accepted the conciliation agreement signed by John J. Donlon on behalf of the Colorado Building and Construction Trades Council Labor Registration Committee. Accordingly, the Commission also accepted the check for \$1,000 submitted by your client on May 27, 1981 as payment for the civil penalty upon the settlement of this matter.

This file, therefore, has been closed and will become part of the public record within thirty days.

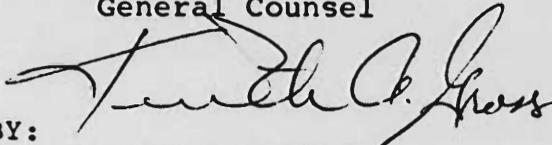
2 U.S.C. § 437g(a)(4)(B), however, prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele  
General Counsel

BY:

  
Kenneth A. Gross  
Associate General Counsel

Enclosure

81040300155



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. Donald P. MacDonald  
Hornbein, MacDonald, Fattor  
and Buckley  
1900 Colorado State Bank Building  
Denver, Colorado 80202

Re: MUR 1150

Dear Mr. MacDonald:

On August 11, 1981, the Commission accepted the conciliation agreement signed by John J. Donlon on behalf of the Colorado Building and Construction Trades Council Labor Registration Committee. Accordingly, the Commission also accepted the check for \$1,000 submitted by your client on May 27, 1981 as payment for the civil penalty upon the settlement of this matter.

This file, therefore, has been closed and will become part of the public record within thirty days.

2 U.S.C. § 437g(a)(4)(B), however, prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele  
General Counsel

BY:

Kenneth A Gross  
Associate General Counsel

Enclosure

81040300456

RECEIVED  
Doc# 5095  
81 JUL 20 A9:39

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Colorado Building and Construction )  
Trades Council Labor Registration )  
Committee )

31 JUL 20 A10:57  
MUR 1150

CONCILIATION AGREEMENT

The Federal Election Commission (hereinafter the "Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, initiated this matter to determine whether the Colorado Building and Construction Trades Council Labor Registration Committee ("Respondent") violated 2 U.S.C. §433, §434 and §441b(a).

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(4)(A), do hereby agree as follows:

I. The commission has jurisdiction over the Respondent and the subject matter of this proceeding.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this Agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent Colorado Building and Construction Trades Council Labor Registration Committee, is a political committee pursuant to 2 U.S.C. §431(4).

2. Respondent made contributions to federal candidates in the aggregate of \$1,365 in 1976, \$1,300 in 1977 and \$4,470 in 1978.

3. Respondent was not registered as a political committee with the Commission at the time it made such contributions, and did not register until October 1979.

4. Respondent failed to report its receipts and disbursements until January 22,

81040300457

1980.

5. Respondent received contributions from labor organizations and placed them in an account from which contributions to federal candidates were made.

6. Following notification from the Commission of possible violations, Respondent recovered \$3,000 in contributions made to federal candidates.

WHEREFORE, the Commission finds:

V. Respondent violated 2 U.S.C. §433 by failing to timely register as a political committee.

VI. Respondent violated 2 U.S.C. §434 by failing to timely report receipts and disbursements.

VII. Respondent violated 2 U.S.C. §441b(a) by receiving contributions from labor organizations and placing them in an account from which contributions were made to federal candidates

VIII. Respondent wishes to enter into a Conciliation agreement as a complete bar to any further action by the Commission, and without contesting the Commission's findings,

NOW, THEREFORE, it is agreed:

IX. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand Dollars (\$1,000.00), pursuant to 2 U.S.C. §437g(a)(5)(A).

X. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended 2 U.S.C. §431, et seq.

GENERAL CONDITIONS

XI. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any

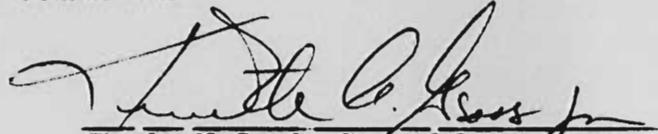
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requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

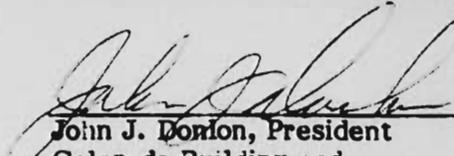
XII. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

XIII. It is agreed that Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

Aug 13, 1981  
Date

  
Charles N. Steele, General Counsel  
Federal Election Commission

7-15-81  
Date

  
John J. Dornon, President  
Colorado Building and  
Construction Trades Council  
Labor Registration Committee

81040300459



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Colorado Building and Construction ) MUR 1150  
Trades Council Labor Registration )  
Committee )

CERTIFICATION

I, Lena L. Stafford, Recording Secretary for the Federal Election Commission's Executive Session on August 11, 1981, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1150

1. Approve and send the conciliation agreement and letter, attached to the General Counsel's Memorandum dated August 4, 1981, to the Colorado Building and Construction Trades Council Labor Registration Committee.
2. Close the file.

Commissioners Aikens, Harris, McGarry, Reiche, Thomson, and Tiernan voted affirmatively.

Attest:

8-12-81  
Date

Lena L. Stafford  
Recording Secretary

81040300461

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HORNBEIN, MacDONALD AND FATTOR, P.C.

ATTORNEYS AT LAW

SUITE 1900 - COLORADO STATE BANK BUILDING  
DENVER, COLORADO 80202

No. 7904

23-60  
1020

May 27 1981

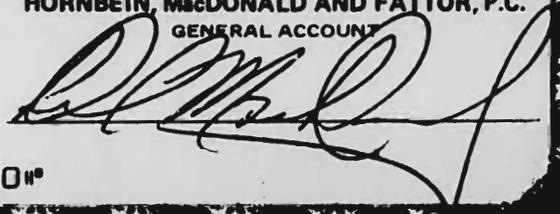
PAY ONE THOUSAND AND NO/100 ----- \$1,000.00

TO THE ORDER OF UNITED STATES TREASURY

FOR FEC: MUR 1150 - Civil Penalty  
Colorado Building and Construction  
COLORADO STATE BANK OF DENVER Trades Labor  
DENVER, COLORADO Registration Committee

HORNBEIN, MacDONALD AND FATTOR, P.C.  
GENERAL ACCOUNT

BY



⑆02000607⑆ 25 528 10 ⑈



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 26, 1981

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Thomas E. Jagger, Treasurer  
Ray Kogovsek for Congress  
Committee  
127 First National Bank  
Pueblo, Colorado 81003

Re: MUR 1150 - Ray Kogovsek  
for Congress Committee

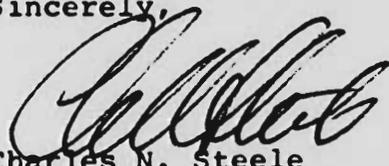
Dear Mr. Jagger:

On June 8, 1979, the Reports Analysis Division of the Federal Election Commission (the "Commission"), notified you of a reason to believe finding that your committee violated 2 U.S.C. § 441a(f) by accepting a contribution in excess of lawful limitations.

The Reports Analysis Division subsequently referred this matter to the Office of General Counsel for further consideration. However, based upon additional information made available to the Commission in connection with this matter, the Commission determined on March 24, 1981, to take no further action and to close the file regarding your committee's involvement in this matter.

If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter, at (202)523-4529.

Sincerely,

  
Charles N. Steele  
General Counsel

81040300463

81040300464

3-26-81

PS Form 3811, Jan. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● **SENDER:** Complete items 1, 2, and 3.  
Add your address to the "RETURN TO" space on reverse.

1. The following service is requested (check one.)  
 Show to whom and date delivered.....  
 Show to whom, date and address of delivery.....  
 **RESTRICTED DELIVERY**  
 Show to whom and date delivered.....  
 **RESTRICTED DELIVERY.**  
 Show to whom, date, and address of delivery.....  
 (CONSULT POSTMASTER FOR FEES)

2. **ARTICLE ADDRESSED TO**  
*Anna E. Popper*

3. **ARTICLE DESCRIPTION:**  
 REGISTERED NO. *445066* CERTIFIED NO. \_\_\_\_\_ INSURED NO. \_\_\_\_\_  
 (Always obtain signature of addressee or agent)  
 I have received the article described above.  
 SIGNATURE  Address  Authorized agent

4. **DATE OF DELIVERY**  
*3023*

5. **ADDRESS** (Complete only if requested)  
*4-81*

6. **UNABLE TO DELIVER BECAUSE:**  
*no need*

PUERTO RICO  
 APR 1 1981  
 0600  
 CLERK'S INITIALS  
*Or*

☆ GPO : 1978-381-1



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Thomas E. Jagger, Treasurer  
Ray Kogovsek for Congress  
Committee  
127 First National Bank  
Pueblo, Colorado 81003

Re: MUR 1150 - Ray Kogovsek  
for Congress Committee

Dear Mr. Jagger:

On June 8, 1979, the Reports Analysis Division of the Federal Election Commission (the "Commission"), notified you of a reason to believe finding that your committee violated 2 U.S.C. § 441a(f) by accepting a contribution in excess of lawful limitations.

The Reports Analysis Division subsequently referred this matter to the Office of General Counsel for further consideration. However, based upon additional information made available to the Commission in connection with this matter, the Commission determined on March , 1981, to take no further action and to close the file regarding your committee's involvement in this matter.

If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter, at (202)523-4529.

Sincerely,

Charles N. Steele  
General Counsel

*CNS*

81040300465



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 26, 1981

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Donald P. MacDonald  
HORNBEIN, MACDONALD, FATTOR  
AND BUCKLEY  
1900 Colorado State Bank Building  
Denver, Colorado 80202

Re: MUR 1150

Dear Mr. MacDonald:

In your letter of November 24, 1980, you request that the Commission and your client, the Colorado Building and Construction Trades Council Labor Registration Commission, enter into informal conciliation with respect to your client's violations of 2 U.S.C. § 433, § 434, and § 441b(a).

Accordingly, enclosed for your approval is a conciliation agreement which the Commission is prepared to accept in the settlement of this matter.

If the enclosed agreement is acceptable to you and your client, please sign and return it, along with the civil penalty, to the Commission within fifteen days. Please make your check for the civil penalty payable to the U.S. Treasurer.

If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter at (202)523-4529.

Sincerely,

  
Charles N. Steele  
General Counsel

Enclosure  
Conciliation Agreement

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3-26-81

PS Form 3811, Jan. 1978

**SENDER:** Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)

Show to whom and date delivered.....

Show to whom, date and address of delivery.....

RESTRICTED DELIVERY  
Show to whom and date delivered.....

RESTRICTED DELIVERY.  
Show to whom, date, and address of delivery.....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
*Ronald P. MacDonald*

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>EH-5646</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE  Addressee  Agent  Postmaster

*Ronald P. MacDonald*

4. DATE OF DELIVERY  
*3-30-81*

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

*1150 Weeder*

INITIALS

**MAR 30 1981**

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Colorado Building and Construction ) MUR 1150  
Trades Council Labor Registration )  
Committee )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 24, 1981, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1150:

1. Take no further action with respect to the 2 U.S.C. § 441a(f) violation by the Kogovsek for Congress Committee.
2. Approve and send the letter to the Kogovsek for Congress Committee (Attachment 2 to the General Counsel's March 6, 1981 report).
3. Close the file with respect to the Kogovsek Committee's involvement in this matter.
4. Approve and send the letter and conciliation agreement to the Colorado Committee (Attachment 3 to the General Counsel's March 6, 1981 report).

Attest:

3/24/81  
Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary of the Commission

81040300468

Report signed:	3-11-81
Report received in Office of the Commission Secretary:	3-12-81, 11:02
Circulated on 48 hour vote basis:	3-12-81, 4:00
Objection filed. Placed on agenda.	



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*  
FROM: MARJORIE W. EMMONS/JODY CUSTER *jc*  
DATE: MARCH 17, 1981  
SUBJECT: OBJECTION - MUR 1150, General Counsel's Report,  
dated March 6, 1981; Received in OCS, 3-12-81,  
11:02

The above-named document was circulated on a 48  
hour vote basis at 4:00, March 12, 1981.

Commissioners Harris and Aikens submitted objections  
on March 16, 1981 at 1:37 and 3:53 p.m., respectively.

This matter will be placed on the Executive Session  
Agenda for March 24, 1981. A copy of Commissioner Harris'  
vote sheet with comments is attached.

Attachment: Vote Sheet

81040300469

March 12, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1150

Please have the attached General Counsel's Report distributed to the Commission on a 48 hour tally basis.

Thank you.

81040300470



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS / JODY CUSTER *jc*  
DATE: MARCH 17, 1981  
SUBJECT: COMMENTS REGARDING MUR 1150

Attached is a copy of Commissioner Thomson's  
vote sheet with comments regarding MUR 1150.

81040300471

ATTACHMENT:  
Copy of Vote Sheet

BEFORE THE FEDERAL ELECTION COMMISSION

March 6, 1981

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

81 MAR 12 11:02

In the Matter of )  
 )  
Colorado Building and Construction )  
Trades Council Labor Registration )  
Committee )

MUR 1150

GENERAL COUNSEL'S REPORT

I. Background

On January 21, 1980, the Reports Analysis Division ("RAD") referred to the Office of General Counsel the matter in which the Colorado Building and Construction Trades Council Labor Registration Committee (the "Colorado Committee") and the Ray Kogovsek for Congress Committee (the "Kogovsek Committee") may have violated certain provisions of the FECA, as amended. Specifically, on June 8, 1979, the Commission, through RAD, found reason to believe that the Kogovsek Committee violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from the Colorado Committee. On August 3, 1979, the Commission, through RAD, found reason to believe that the Colorado Committee violated 2 U.S.C. § 433 by failing to register as a political committee. The Colorado Committee subsequently registered with the Commission in October, 1979.

On June 3, 1980, the Commission also found reason to believe that the Colorado Committee violated 2 U.S.C. § 434 by failing to report its receipts and disbursements for 1977-78.

On July 9, 1980, the Colorado Committee submitted its reports of receipts and disbursements for 1976, 1977, and 1978 in compliance

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with 2 U.S.C. § 434. The reports, however, disclosed receipts of contributions from various labor organizations in violation of 2 U.S.C. § 441b(a). Thus, on October 15, 1980, the Commission found reason to believe that the Colorado Committee violated 2 U.S.C. § 441b(a) by accepting contributions from labor organizations in connection with federal elections.

The Colorado Committee submitted a response to the Commission's finding on November 20, 1980 which requests that the Commission and the Colorado Committee enter into informal conciliation regarding the § 441b(a), as well as the § 433 and § 434, violations. The Colorado Committee also submitted a further addendum on December 5 which states that the Colorado Building and Construction Trades Council is a labor organization affiliated with state and national AFL-CIO Labor organizations.

An analysis of this matter follows.

A. Ray Kogovsek for Congress Committee

The Colorado Committee made a \$3,000 contribution to the Kogovsek Committee on April 4, 1978. However, after notification by RAD that the Colorado Committee was not a registered multi-candidate committee, the Kogovsek Committee returned the contribution in toto. The Colorado Committee has subsequently registered with the Commission and has indicated its affiliation with the AFL-CIO Committee on Political Education Political

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Contributions Committee (AFL-CIO COPE PCC), a multi-candidate committee.<sup>1/</sup> Accordingly, the Colorado Committee and all other affiliated committees are afforded the contribution allowances as prescribed by 2 U.S.C. § 441a(a)(2), which includes an aggregate contribution allowance of \$5,000 per principal campaign committee per election for all the affiliated committees.

The Commission, through RAD, initially notified the Kogovsek Committee of a reason to believe finding that it accepted an excess contribution in violation of 2 U.S.C. § 441a(f) on the grounds that the Colorado Committee was not a multi-candidate committee. However, the facts now reveal that had the Colorado Committee been registered the contribution would not have been excessive in light of the Colorado Committee's multi-candidate committee status.<sup>2/</sup> The Office of General Counsel therefore recommends that the Commission take no further action with regard to the Kogovsek Committee's violation of 2 U.S.C. § 441a(f) and close the file with respect to the Kogovsek Committee.

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<sup>1/</sup> See page 5 of Attachment which states that the Colorado Building and Construction Trades Council is a labor organization affiliated with State and National AFL-CIO labor organizations. It therefore follows that the Colorado Committee is affiliated with AFL-CIO COPE PCC and its other affiliates.

<sup>2/</sup> Reports on file reveal that the aggregate contributions to the Kogovsek Committee from the Colorado Committee, the AFL-CIO COPE PCC, and the other affiliated committees would not have exceeded lawful limitations even if no refund had occurred.

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B. Colorado Committee

In its response of November 20, 1980, the Colorado Committee acknowledges that it received contributions from labor organizations. The Colorado Committee, however, offers various militating factors in its defense. The Colorado Committee stresses the fact that its main purpose is to participate in state election activities and that labor organizations as well as corporations are permitted to make campaign contributions pursuant to Colorado state law. Thus, the Colorado Committee asserts that a violation of § 441b(a) occurred notwithstanding its good intentions.

In addition, the Colorado Committee contends that the funds in its accounts from sources other than labor organizations were more than sufficient to account for the minimal amount contributed to federal candidates for each year in question.<sup>3/</sup>

While the Committee's records support this contention, the statute does not allow for an apportionment of funds for specific contributions when all receipts have been deposited into one account. 2 U.S.C. § 441b(a) clearly states that is unlawful for any political committee to make contributions to federal candidates from an account which contains contributions from labor organizations. Thus, the Committee's receipt of contributions

---

<sup>3/</sup> The Colorado Committee contributed an aggregate of \$1,365 to federal candidates in 1976; \$1,300 (all of which has been refunded), in 1977; and \$4,470 (of which \$3,000 has been refunded), in 1978.

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from labor organizations into an account from which the Committee made contributions to federal candidates results in a violation of 2 U.S.C. § 441b(a).

In any event, although the Committee raises these various militating factors in its defense, the Committee ultimately agrees with the Commission's finding and requests that the Commission and the Committee enter into informal conciliation so as to reach an expeditious resolution of this matter. The Office of General Counsel therefore has attached a conciliation agreement for the Commission's approval.

Portions Deleted by  
Exemption -

5 U.S.C. § 552 (b)(3)

by statute -

2 U.S.C. § 437 <sup>(a)</sup> (4) (B) (i)

81040600476

81040300477

IV. Recommendations

1. Take no further action with respect to the 2 U.S.C. § 441a(f) violation by the Kogovsek for Congress Committee.
2. Approve and send the attached letter to the Kogovsek for Congress Committee.
3. Close the file with respect to the Kogovsek Committee's involvement in this matter.
4. Approve and send the attached letter and conciliation agreement to the Colorado Committee.

11 March 1981  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel

Attachments

1. Responses from Colorado Committee
2. Letter to the Kogovsek Committee
3. Letter and Conciliation Agreement to Donald P. MacDonald, counsel for the Colorado Committee

**HORNBEIN, MACDONALD, FATTOR AND BUCKLEY**

PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW

1800 COLORADO STATE BANK BUILDING  
DENVER, COLORADO 80202

PHILIP HORNBEIN (1982)

PHILIP HORNBEIN, JR.  
DONALD R. MACDONALD  
JAMES C. FATTOR  
MARTIN D. BUCKLEY  
DAN R. SWENSON

AREA CODE 303  
861-7070

November 7, 1980

30 NOV 20 P 2: 13

GENERAL COUNSEL

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

ATTN: John Warren McGarry,  
Vice Chairman

RE: MUR 1150

Dear Vice Chairman McGarry:

I have your thoughtful letter of October 16, 1980 concerning my client, the Colorado Building and Construction Trades Council Labor Registration Committee. In the interest of bringing this matter to an early conclusion, permit me to make the following observations.

Under Colorado law, a labor organization, as well as a corporation, is permitted to make campaign contributions. Since its organization, our client, the Committee, has made relatively few contributions to federal candidates. Conceptually, it was to make no such contributions and its structure, therefore, was not adapted to the requirements of the Federal Election Laws. As a direct consequence, its reporting has been sporadic, its purposes confused and you are perfectly right in raising the concerns which you have.

By way of example, in 1976, your letter suggests that funds received from labor organizations were contributed to federal candidates. We disagree. My figures, taken from your letter, indicate that \$2,197 were received from labor organizations. However, an examination of the report for 1976 indicates that there was cash on hand at the beginning of the reporting period in the amount of \$3,400.75 and additional, non-labor organization contributions received in the sum of \$1,862.50. The aggregate funds available from other than labor organization contributions were more than sufficient to make the federal campaign contributions during that same reporting period, as they totalled only \$1,365.

In 1977, a total of \$1,300 was contributed by the Committee to federal candidates, primarily Congressman Kogovsek and Senator Haskell. As reflected in the report, Senator Haskell returned his contributions to the Committee. As reflected in subsequent reports, the \$1,000 contributed to Congressman Kogovsek was

Attachment 1

81040300479

Federal Election Commission  
Attn: John Warren McGarry  
November 7, 1980  
Page Two

returned by him. Nonetheless, whether the money was returned or not, there were sufficient funds in the Committee's accounts, over and above labor contributions received during 1977, to make the contributions in question without using funds contributed by labor organizations.

While it is true that, in 1978, the sum of \$4,470 was contributed to candidates for federal office, of that amount, \$3,000 was returned by Congressman Kogovsek. The amount contributed to Congressman Kogovsek was received by the Committee from the Political Education Fund of the Building and Construction Trades Department, earmarked for the Congressman. Following instructions from Colorado COPE, it sent the money to the Congressman, believing all reports to be the responsibility of that Committee. When problems were discovered, the contribution was returned by Congressman Kogovsek and forwarded to the Building Trades fund on May 25, 1979. Again, as in prior years, while there were contributions to candidates for federal office, there were also, on hand, funds from sources other than labor organizations sufficient in amount to permit the Committee to make lawful contributions.

The function of the Committee has not been, and is not now, to contribute to candidates for federal office. Its functions are parochial, directed to voter registration, the education of members of labor organizations, and the election of candidates for state office. The absence of separate accounts is a clear indication that the Committee was neither designed nor intended for compliance with Federal Election Laws.

In that regard, because of the complexities of the federal law, it has become a well-established practice that contributions to candidates for federal office will be directed through one political action committee. In Colorado, that committee is Colorado COPE. It was this Committee's understanding that the Kogovsek contributions would be fully and properly reported by Colorado COPE as having originated with the Building Trades Department Fund. Subsequent to the contribution, this Committee was advised by Colorado COPE that it did not include the contribution in its report. Thus, through no fault of its own, and notwithstanding its good intention, this Committee was placed in violation of the law.

Suffice it to say, this Committee is now out of the federal contribution business. In summary, the Committee, throughout the period in question, has had on hand sufficient funds received from volunteer contributions to make the small number of federal candidate contributions which it made. The Kogovsek contribution was returned because of the ineligibi-

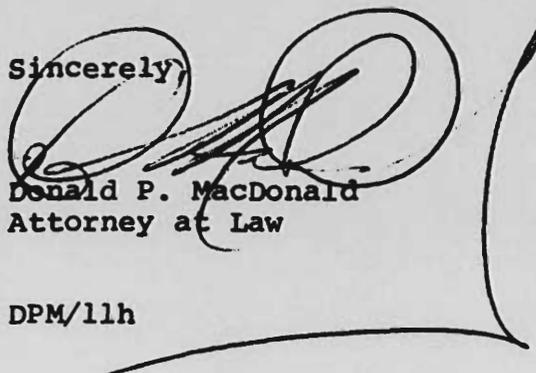
81040300479

Federal Election Commission  
Att: John Warren McGarry  
November 7, 1980  
Page Three

lity of Colorado COPE to make further contributions to the  
Congressman and the misunderstanding with respect to the res-  
ponsibility for reporting that contribution.

As stated in the beginning of this letter, it is the Committee's  
hope that this matter will be resolved expeditiously. I shall  
be pleased to respond further or talk directly to members of  
the Commission's staff for the purpose of reaching a speedy  
solution.

Sincerely,

  
Donald P. MacDonald  
Attorney at Law

DPM/llh

81049300480

3457

10

**HORNBEIN, MACDONALD, FATTOR AND BUCKLEY**

PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

1800 COLORADO STATE BANK BUILDING

DENVER, COLORADO 80202

PHILIP HORNBEIN (1982)

PHILIP HORNBEIN, JR.  
DONALD P. MACDONALD  
JAMES C. FATTOR  
MARTIN G. BUCKLEY  
DAN R. SWENSON

AREA CODE 303  
681-7070

November 24, 1980

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

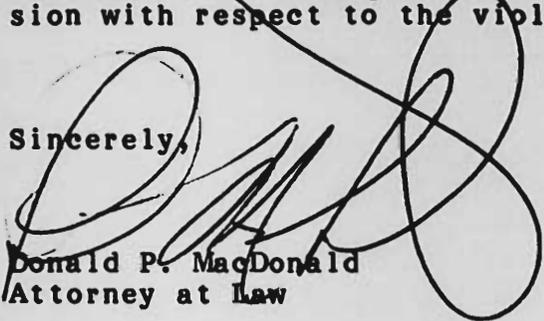
ATTN: John Waren McGarry  
Vice Chairman

RE: Colorado Building and Construction Trades  
Labor Registration Committee

Dear Mr. McGarry:

We respectfully request conciliation on behalf of the above-referenced Committee prior to any further findings by the Commission with respect to the violations alleged to have occurred.

Sincerely,

  
Donald P. MacDonald  
Attorney at Law

DPM/11h

81040300481

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1150

11

**HORNBEIN, MACDONALD, FATTOR AND BUCKLEY**

PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

1800 COLORADO STATE BANK BUILDING

DENVER, COLORADO 80202

PHILIP HORNBEIN (1982)

PHILIP HORNBEIN, JR.  
DONALD R. MACDONALD  
JAMES C. FATTOR  
MARTIN D. BUCKLEY  
DAN R. SWENSON

AREA CODE 303  
881-7070

December 5, 1980

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

ATTN: John Warren McGarry  
Vice Chairman

RE: Colorado Building and Construction Trades  
Labor Registration Committee

Dear Mr. McGarry:

We have been requested to provide additional information concerning the Committee and the source of certain funds. This letter is in response to that request.

On the basis of my investigation, the Committee was organized by members of the Colorado Building and Construction Trades Council to raise funds to be used primarily in voter registration and education drives and for the election of candidates for state office. The Colorado Building and Construction Trades Council is a labor organization affiliated with state and national AFL-CIO labor organizations. As has been pointed out on previous occasions, the committee was not organized for the purpose of making contributions to candidates for federal office and was in existence prior to the establishment of the Federal Election Commission and the adoption of rules and regulations governing contributions in federal elections.

To make contributions to state candidates for office, the Committee, as the reports reflect, received contributions from various sources. As reflected in its reports, the Committee had cash on hand, at the time it filed its Statement of Organization, in the amount of \$3,400.75. An effort has been made to determine the source of the cash on hand at the time of registration by the Committee. To do this, it was required that we go back a period of over four years. As best I can determine,

81040300492

NO DEC 15 11:52

GENERAL INVESTIGATIVE

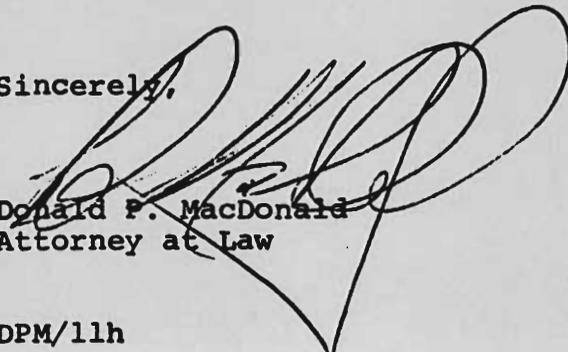
10

Federal Election Commission  
Attn: John Warren McGarry  
December 5, 1980  
Page Two

the sources of cash on hand were as follows: \$3,000 received in June, 1974 from the AFL-CIO COPE Committee, and \$1,200 revenue received during 1975.

We trust that the above satisfactorily responds to your inquiry. We will be happy to discuss these matters further with you at your convenience.

Sincerely,

  
Donald F. MacDonald  
Attorney at Law

DPM/1lh

81040300483



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Thomas E. Jagger, Treasurer  
Ray Kogovsek for Congress  
Committee  
127 First National Bank  
Pueblo, Colorado 81003

Re: MUR 1150 - Ray Kogovsek  
for Congress Committee

Dear Mr. Jagger:

On June 8, 1979, the Reports Analysis Division of the Federal Election Commission (the "Commission"), notified you of a reason to believe finding that your committee violated 2 U.S.C. § 441a(f) by accepting a contribution in excess of lawful limitations.

The Reports Analysis Division subsequently referred this matter to the Office of General Counsel for further consideration. However, based upon additional information made available to the Commission in connection with this matter, the Commission determined on March , 1981, to take no further action and to close the file regarding your committee's involvement in this matter.

If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter, at (202)523-4529.

Sincerely,

Charles N. Steele  
General Counsel

81040300484

Attachment 2



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Donald P. MacDonald  
HORNBEIN, MACDONALD, FATTOR  
AND BUCKLEY  
1900 Colorado State Bank Building  
Denver, Colorado 80202

Re: MUR 1150

Dear Mr. MacDonald:

In your letter of November 24, 1980, you request that the Commission and your client, the Colorado Building and Construction Trades Council Labor Registration Commission, enter into informal conciliation with respect to your client's violations of 2 U.S.C. § 433, § 434, and § 441b(a).

Accordingly, enclosed for your approval is a conciliation agreement which the Commission is prepared to accept in the settlement of this matter.

If the enclosed agreement is acceptable to you and your client, please sign and return it, along with the civil penalty, to the Commission within fifteen days. Please make your check for the civil penalty payable to the U.S. Treasurer.

If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter at (202)523-4529.

Sincerely,

Charles N. Steele  
General Counsel

Enclosure  
Conciliation Agreement

Attachment 3

81040300485

14

cc 3560

1150

**HORNBEIN, MACDONALD, FATTOR AND BUCKLEY**

PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

1900 COLORADO STATE BANK BUILDING

DENVER, COLORADO 80202

PHILIP HORNBEIN (1982)

PHILIP HORNBEIN, JR.  
DONALD R. MACDONALD  
JAMES C. FATTOR  
MARTIN D. BUCKLEY  
DAN R. SWENSON

AREA CODE 303  
881-7070

December 5, 1980

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

ATTN: John Warren McGarry  
Vice Chairman

RE: Colorado Building and Construction Trades  
Labor Registration Committee

Dear Mr. McGarry:

We have been requested to provide additional information concerning the Committee and the source of certain funds. This letter is in response to that request.

On the basis of my investigation, the Committee was organized by members of the Colorado Building and Construction Trades Council to raise funds to be used primarily in voter registration and education drives and for the election of candidates for state office. The Colorado Building and Construction Trades Council is a labor organization affiliated with state and national AFL-CIO labor organizations. As has been pointed out on previous occasions, the committee was not organized for the purpose of making contributions to candidates for federal office and was in existence prior to the establishment of the Federal Election Commission and the adoption of rules and regulations governing contributions in federal elections.

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NO DEC 15 11:52

GENERAL INVESTIGATIVE  
DIVISION

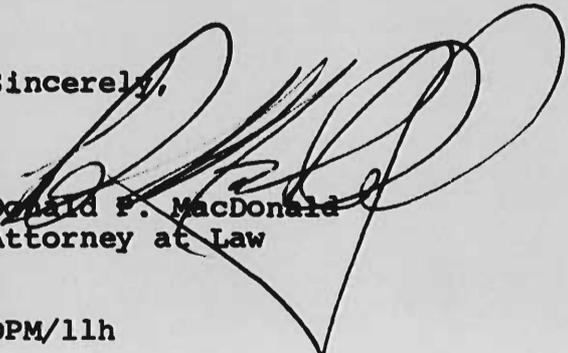
81040300486

Federal Election Commission  
Attn: John Warren McGarry  
December 5, 1980  
Page Two

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We trust that the above satisfactorily responds to your inquiry. We will be happy to discuss these matters further with you at your convenience.

Sincerely,



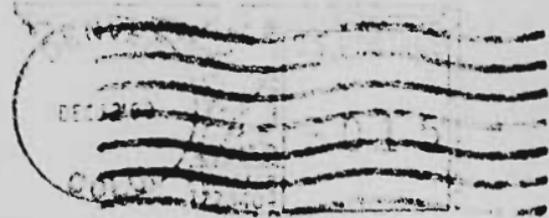
Donald F. MacDonald  
Attorney at Law

DPM/11h

81040300487

**HORNBEIN, MACDONALD, FATTOR AND BUCKLEY**

PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
1900 COLORADO STATE BANK BUILDING  
DENVER, COLORADO 80202



1040300488

*General  
Council's  
Office*

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

ATTN: John Warren McGarry  
Vice Chairman

00:00:15 A9:00

600#3379

**HORNBEIN, MACDONALD, FATTOR AND BUCKLEY**

PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

1900 COLORADO STATE BANK BUILDING

DENVER, COLORADO 80202

PHILIP HORNBEIN (1982)

PHILIP HORNBEIN, JR.  
DONALD R. MACDONALD  
JAMES C. FATTOR  
MARTIN D. BUCKLEY  
DAN R. SWENSON

AREA CODE 303  
861-7070

November 7, 1980

30 NOV 20 P 2: 13

GENERAL INVESTIGATIVE DIVISION

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

ATTN: John Warren McGarry,  
Vice Chairman

RE: MUR 1150

Dear Vice Chairman McGarry:

I have your thoughtful letter of October 16, 1980 concerning my client, the Colorado Building and Construction Trades Council Labor Registration Committee. In the interest of bringing this matter to an early conclusion, permit me to make the following observations.

Under Colorado law, a labor organization, as well as a corporation, is permitted to make campaign contributions. Since its organization, our client, the Committee, has made relatively few contributions to federal candidates. Conceptually, it was to make no such contributions and its structure, therefore, was not adapted to the requirements of the Federal Election Laws. As a direct consequence, its reporting has been sporadic, its purposes confused and you are perfectly right in raising the concerns which you have.

By way of example, in 1976, your letter suggests that funds received from labor organizations were contributed to federal candidates. We disagree. My figures, taken from your letter, indicate that \$2,197 were received from labor organizations. However, an examination of the report for 1976 indicates that there was cash on hand at the beginning of the reporting period in the amount of \$3,400.75 and additional, non-labor organization contributions received in the sum of \$1,862.50. The aggregate funds available from other than labor organization contributions were more than sufficient to make the federal campaign contributions during that same reporting period, as they totalled only \$1,365.

In 1977, a total of \$1,300 was contributed by the Committee to federal candidates, primarily Congressman Kogovsek and Senator Haskell. As reflected in the report, Senator Haskell returned his contributions to the Committee. As reflected in subsequent reports, the \$1,000 contributed to Congressman Kogovsek was

81040300499

Federal Election Commission  
Attn: John Warren McGarry  
November 7, 1980  
Page Two

returned by him. Nonetheless, whether the money was returned or not, there were sufficient funds in the Committee's accounts, over and above labor contributions received during 1977, to make the contributions in question without using funds contributed by labor organizations.

While it is true that, in 1978, the sum of \$4,470 was contributed to candidates for federal office, of that amount, \$3,000 was returned by Congressman Kogovsek. The amount contributed to Congressman Kogovsek was received by the Committee from the Political Education Fund of the Building and Construction Trades Department, earmarked for the Congressman. Following instructions from Colorado COPE, it sent the money to the Congressman, believing all reports to be the responsibility of that Committee. When problems were discovered, the contribution was returned by Congressman Kogovsek and forwarded to the Building Trades fund on May 25, 1979. Again, as in prior years, while there were contributions to candidates for federal office, there were also, on hand, funds from sources other than labor organizations sufficient in amount to permit the Committee to make lawful contributions.

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Suffice it to say, this Committee is now out of the federal contribution business. In summary, the Committee, throughout the period in question, has had on hand sufficient funds received from volunteer contributions to make the small number of federal candidate contributions which it made. The Kogovsek contribution was returned because of the ineligibi-

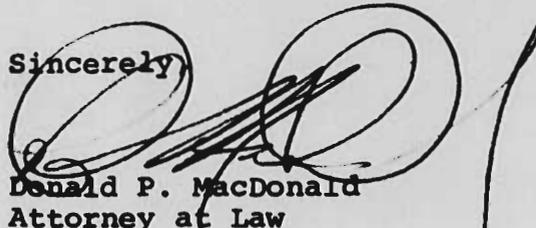
81040300490

Federal Election Commission  
Att: John Warren McGarry  
November 7, 1980  
Page Three

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As stated in the beginning of this letter, it is the Committee's  
hope that this matter will be resolved expeditiously. I shall  
be pleased to respond further or talk directly to members of  
the Commission's staff for the purpose of reaching a speedy  
solution.

Sincerely,



Donald P. MacDonald  
Attorney at Law

DPM/llh

81040300491

**HORNBEIN, MACDONALD, FATTOR AND BUCKLEY**

PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

1900 COLORADO STATE BANK BUILDING

DENVER, COLORADO 80202



0010300492

*Forward to  
OHC*

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

ATTN: ~~John Warren McGarry~~  
Vice Chairman

80 NOV 20 AM 11:43

Gr#  
3457

1100

**HORNBEIN, MACDONALD, FATTOR AND BUCKLEY**

PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

1800 COLORADO STATE BANK BUILDING

DENVER, COLORADO 80202

PHILIP HORNBEIN (1982)

PHILIP HORNBEIN, JR.  
DONALD P. MACDONALD  
JAMES C. FATTOR  
MARTIN D. BUCKLEY  
DAN R. SWENSON

AREA CODE 303  
881-7070

November 24, 1980

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

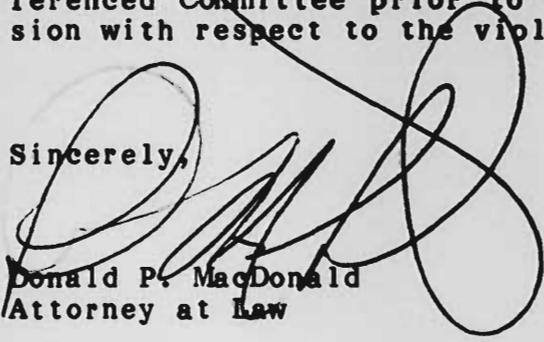
ATTN: John Waren McGarry  
Vice Chairman

RE: Colorado Building and Construction Trades  
Labor Registration Committee

Dear Mr. McGarry:

We respectfully request conciliation on behalf of the above-referenced Committee prior to any further findings by the Commission with respect to the violations alleged to have occurred.

Sincerely,

  
Donald P. MacDonald  
Attorney at Law

DPM/11h

81040300493

**HORNBEIN, MACDONALD, FATTOR AND BUCKLEY**

PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

1808 COLORADO STATE BANK BUILDING

DENVER, COLORADO 80202



1010300494

*forward to  
JWC*

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

ATTN: John Warren McGarry  
Vice Chairman

80 NOV 28 P12: 58





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 16, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Donald P. MacDonald, Esquire  
Hornbein, MacDonald, Fattor  
and Buckley, P.C.  
1900 Colorado State Bank Building  
Denver, Colorado

Re: MUR 1150

Dear Mr. MacDonald:

The Federal Election Commission notified your client, the Colorado Building and Construction Trades Council Labor Registration Committee (the "Committee"), in a letter dated June 25, 1980, that the Commission found reason to believe that the Committee violated the Federal Election Campaign Act of 1971, as amended ("the Act"), specifically 2 U.S.C. § 433 and § 434.

Upon further review of the information available to the Commission, the Commission determined on October 15, 1980, that there is reason to believe that your client violated 2 U.S.C. § 441b(a) by accepting contributions from labor organizations in connection with federal election activities. A report on the Commission's additional finding is enclosed for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

Please submit answers/documents to the enclosed interrogatories/request for documents within fifteen days of your receipt of this letter. In the absence of any additional information which demonstrates that no further action should be taken against your client, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

81040300495

Donald P. MacDonald  
Page Two

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter at (202)523-4529.

Sincerely,



JOHN WARREN McGARRY  
Vice-Chairman

Enclosures

1. Notification of Reason to Believe Finding
2. Interrogatories/Request for Documents

81040300496

MAILING LABEL

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" section.

1. The following service is requested (check one):

- Show to whom and date delivered.
- Show to whom, date and address of delivery.
- RESTRICTED DELIVERY Show to whom and date delivered.
- RESTRICTED DELIVERY Show to whom, date, and address of delivery.

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
Donald P. MacDonald

3. ARTICLE DESCRIPTION:  
REGISTERED NO. CERTIFIED NO. REGISTERED NO.  
946939

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE: *Donald P. MacDonald*  
ADDRESS: *R. Carter*

4. DATE OF DELIVERY: *10-21*

5. ADDRESS (Complete only if requested):  
*02:64 9213000*

6. UNABLE TO DELIVER BECAUSE:

1150 weeder

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1700: 198-00-00

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE: OCT 16 1980

MUR NO: 1150  
STAFF MEMBER(S) & TEL. NO.  
Carolyn Weeder (202)523-4529

RESPONDENT: Colorado Building and Construction Trades  
Council Labor Registration Committee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On August 3, 1979, the Commission determined that there was reason to believe that the Committee violated 2 U.S.C. § 433 by failing to timely register as a political committee. Additionally, on June 25, 1980, the Commission found reason to believe that the Committee had violated 2 U.S.C. § 434 by failing to report its receipts and disbursements for 1977-78.

Accordingly, the Commission notified the Committee of the reason to believe findings. In the letter which accompanied this notification, the Commission also requested that the Committee submit additional information as to who created the Committee and whether it has any tie-in or relationship with any labor organization, and, if so, what that tie-in or relationship is.

On July 9, 1980, the Committee submitted reports of its receipts and disbursements for 1976, 1977, and 1978, as requested by the Commission. These reports disclose additional possible violations.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 441b(a) prohibits political committees from accepting contributions from any labor organization in connection with federal elections. However, the reports of receipts and disbursements for 1976, 1977, and 1978, recently submitted by the Committee disclose receipts of contributions from various labor organizations. These contributions are listed on the following four pages.

81040300497

1976 - Schedule A

Itemized Receipts

81040300498

<u>Contributor</u>	<u>Occupation</u>	<u>Date</u>	<u>Amount</u>
Plumbers Local 3 360 Acoma St., Room 316 Denver, Colo 80223	Labor Union	07/22/76	\$ 50.00
		08/10/76	50.00
		09/13/76	50.00
		10/22/76	300.00
		10/12/76	50.00
		11/08/76	50.00
		12/03/76	50.00
		12/10/76	145.00
Asbestos Workers Local 28 1540 Emerson St. Denver, Colo 80218	Labor Union	08/10/76	\$250.00
		09/13/76	50.00
		10/12/76	50.00
		11/12/76	50.00
		12/03/76	39.50
		12/03/76	50.00
Colo State Council of Carp 4050 Templeton Gap Blvd Colorado Springs, Colo 80907	Labor Council	10/27/76	\$100.00
		11/29/76	800.00
Carpetlayers Local 419 360 Acoma St. Denver, Colo 80223	Labor Union	12/21/76	\$ 62.50
<u>1977</u>			
Asbestos Workers Local 28 1540 Emerson St. Denver, Colo 80218	Labor Union	01/24/77	\$ 50.00
		02/10/77	50.00
		03/14/77	50.00
		04/18/77	50.00
		05/18/77	50.00
		06/24/77	50.00
		07/29/77	50.00
		09/12/77	50.00
		10/06/77	50.00
		11/07/77	50.00
		12/07/77	50.00

1977 (continued)

Itemized Receipts

<u>Contributor</u>	<u>Occupation</u>	<u>Date</u>	<u>Amount</u>
Plumbers Local 3 360 Acoma St. Room 316 Denver, Colo. 80223	Labor Union	01/24/77	\$ 50.00
		05/18/77	50.00
		07/11/77	100.00
		08/15/77	50.00
		10/06/77	50.00
		10/28/77	50.00
Electricians Local 68 5660 Logan Denver, Colo 80216	Labor Union	05/18/77	50.00
Carp Dist Council of Denver 3850 Mariposa Denver, Colo 80211	Labor Union Council	05/18/77	1,000.00
		07/11/77	100.00
Millwrights Local 2834 900 West Milky Way Denver, Colo 80221	Labor Union	06/02/77	1,000.00

1978

Asbestos Workers Local 28 1540 Emerson St. Denver, Colo 80218	Labor Union	03/07/78	50.00
		04/12/78	50.00
		06/23/78	50.00
		07/12/78	50.00
		08/08/78	50.00
		09/17/78	50.00
		10/18/78	50.00
		11/20/78	50.00
Millwrights Local 2834 900 Milky Way (West) Denver, Colo 80221	Labor Union	08/15/78	3,000.00

81040300499

1978 (continued)

Itemized Receipts

<u>Contributor</u>	<u>Occupation</u>	<u>Date</u>	<u>Amount</u>
Carp Dist Council Denver 3850 Mariposa Denver, Colo	Labor Council	08/16/78	\$1,500.00
		09/27/78	1,000.00
		10/10/78	2,500.00
		01/18/78	1,000.00
Carp Drywall Local 1391 3357 S Bannock Denver, Colo 80110	Labor Union	09/05/78	500.00
Carpenters Local 1360 Box 519 Steamboat Sprgs, Colo	Labor Union	10/30/78	305.00
		09/05/78	100.00
		10/06/78	400.00
Colo Pipe Trades Assn 229 E Moreno Colo Sprgs, Colo 80903	Labor Organization	09/05/78	1,000.00
Colo Conf of Plasterers & Cement Masons 4515 West 41st Ave Denver, Colo 80212	Labor Organization	09/05/78	1,200.00
Elevator Const Local 25 1540 Emerson St Denver, Colo 80218	Labor Local	09/14/78	500.00
Plumbers Local 3 360 Acoma St Denver, Colo 80223	Labor Union	10/06/78	650.00
Colo Build & Const Trades Council Raffle Fund Account 2860 S Circle Drive Colo Sprgs, Colo 80906	Labor Council	10/11/78	2,820.00
Carpenters State Council 8790 West Colfax Denver, Colo 80215	Labor Council	10/30/78	2,500.00

81040300500

1978 (continued)

Itemized Receipts

<u>Contributor</u>	<u>Occupation</u>	<u>Date</u>	<u>Amount</u>
Operating Engineers Local 9 990 Kalamath Denver, Colo 80204	Labor Union	10/30/78	1,100.00
Carpenters Local 1583 2885 S Broadway Denver, Colo 80110	Labor Union	10/30/78	300.00
Build & Const Trades Dept AFL-CIO	Labor Organization	06/08/78	3,000.00

81040300501

These reports also show that the Committee contributed an aggregated of \$1,365 for 1976; \$1,300 for 1977; and \$4,470 for 1978, to various candidates for federal offices.

Thus, these reports reveal that the Committee accepted contributions from labor organizations which were in turn used in connection with federal election activities. Based on the foregoing analysis, the Federal Election Commission has found reason to believe that the Committee violated 2 U.S.C. § 441b(a) by accepting contributions from labor organizations in connection with federal elections.

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INTERROGATORIES/REQUEST FOR DOCUMENTS

1. Please provide a copy (both front and back) of the check for each contribution listed in the notification.
  
2. In the Commission's letter of June 25, 1980, the Commission requested that the Committee inform it as to who created the Committee and whether it has any tie-in or relationship with any labor organization, and, if so, what that tie-in or relationship is. As the Committee failed to respond to this request, please provide the information at this time.
  
3. 2 U.S.C. § 434(b)(1) and 11 C.F.R. § 104.12 require the disclosure of the source of "cash on hand" at the time of registration. Please disclose the source of the "cash on hand" (\$3,400.75) reported in 1976, pursuant to these provisions.

81040300503

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Colorado Building and Construction ) MUR 1150  
Trades Council Labor Registration )  
Committee )

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the  
Federal Election Commission's Executive Session on October 15,  
1980, do hereby certify that the Commission determined by a vote  
of 6-0 to take the following actions in MUR 1150:

1. Find reason to believe that the Colorado Building and Construction Trades Council Labor Registration Committee violated 2 U.S.C. §441b(a) by accepting contributions from labor organizations in connection with federal election activities.
2. Approve and send the letter, notification of reason to believe finding and interrogatories/request for documents to the Colorado Building and Construction Trades Council Labor Registration Committee, as submitted with the General Counsel's September 17, 1980 report in this matter.

Attest:

10/15/80

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary to the Commission

81040300504



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE *MWE*  
FROM: MARJORIE W. EMMONS/MARGARET CHANEY  
DATE: OCTOBER 7, 1980  
SUBJECT: MUR 1150 - OBJECTION - General Counsel's  
Report dated 9-17-80; Signed 10-2-80;  
Received in OCS 10-2-80, 4:41

The above-named document was circulated on a 48  
hour vote basis at 2:00, October 3, 1980.

Commissioner Aikens submitted an objection at 2:01,  
this date.

This matter will be placed on the Executive Session  
Agenda for Wednesday, October 15, 1980.

81019505

October 2, 1980

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 1150

Please have the attached General Counsel's Report distributed to the Commission on a 48 hour tally basis.  
Thank you.

81049300506

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

September 17, 1980

80 OCT 2 P 4: 41

In the Matter of	)	
	)	MUR 1150
Colorado Building and Construction Trades	)	
Council Labor Registration Committee	)	

GENERAL COUNSEL'S REPORT

I. Background

This matter involves possible violations of certain provisions of the FECA, as amended, by the Colorado Building and Construction Trades Council Labor Registration Committee, (the "Committee"). Specifically, the Commission determined, on August 3, 1979, that there was reason to believe that the Committee violated 2 U.S.C. § 433 by failing to timely register as a political committee. Additionally on June 25, 1980, the Commission found reason to believe that the Committee had violated 2 U.S.C. § 434 by failing to report its receipts and disbursements for 1977-78.

Accordingly, the Commission notified the Committee of the reason to believe findings. In the letter which accompanied this notification, the Commission requested that the Committee submit additional information as to who created the Committee and whether it has any tie-in or relationship with any labor organization, and, if so, what that tie-in or relationship is.

On July 9, 1980, the Committee submitted reports of its receipts and disbursements for 1976, 1977, and 1978, as requested by the Commission. These reports (included as Attachment I) disclose additional possible violations which are discussed herein.

81040300507

II. Legal Analysis

2 U.S.C. § 441b(a) prohibits political committees from accepting contributions from any labor organization in connection with federal elections. However, the reports of receipts and disbursements for 1976, 1977, and 1978, recently submitted by the Committee disclose receipts of contributions from various labor organizations. These contributions are listed on the following four pages.

81040300508

1976 - Schedule A

Itemized Receipts

81040300509

<u>Contributor</u>	<u>Occupation</u>	<u>Date</u>	<u>Amount</u>
Plumbers Local 3 360 Acoma St., Room 316 Denver, Colo 80223	Labor Union	07/22/76	\$ 50.00
		08/10/76	50.00
		09/13/76	50.00
		10/22/76	300.00
		10/12/76	50.00
		11/08/76	50.00
		12/03/76	50.00
		12/10/76	145.00
Asbestos Workers Local 28 1540 Emerson St. Denver, Colo 80218	Labor Union	08/10/76	\$250.00
		09/13/76	50.00
		10/12/76	50.00
		11/12/76	50.00
		12/03/76	39.50
12/03/76	50.00		
Colo State Council of Carp 4050 Templeton Gap Blvd Colorado Springs, Colo 80907	Labor Council	10/27/76	\$100.00
		11/29/76	800.00
Carpetlayers Local 419 360 Acoma St. Denver, Colo 80223	Labor Union	12/21/76	\$ 62.50

1977

Asbestos Workers Local 28 1540 Emerson St. Denver, Colo 80218	Labor Union	01/24/77	\$ 50.00
		02/10/77	50.00
		03/14/77	50.00
		04/18/77	50.00
		05/18/77	50.00
		06/24/77	50.00
		07/29/77	50.00
		09/12/77	50.00
		10/06/77	50.00
		11/07/77	50.00
		12/07/77	50.00

1977 (continued)

Itemized Receipts

<u>Contributor</u>	<u>Occupation</u>	<u>Date</u>	<u>Amount</u>
Plumbers Local 3 360 Acoma St. Room 316 Denver, Colo. 80223	Labor Union	01/24/77	\$ 50.00
		05/18/77	50.00
		07/11/77	100.00
		08/15/77	50.00
		10/06/77	50.00
		10/28/77	50.00
Electricians Local 68 5660 Logan Denver, Colo 80216	Labor Union	05/18/77	50.00
Carp Dist Council of Denver 3850 Mariposa Denver, Colo 80211	Labor Union Council	05/18/77	1,000.00
		07/11/77	100.00
Millwrights Local 2834 900 West Milky Way Denver, Colo 80221	Labor Union	06/02/77	1,000.00

1978

Asbestos Workers Local 28 1540 Emerson St. Denver, Colo 80218	Labor Union	03/07/78	50.00
		04/12/78	50.00
		06/23/78	50.00
		07/12/78	50.00
		08/08/78	50.00
		09/17/78	50.00
		10/18/78	50.00
		11/20/78	50.00
Millwrights Local 2834 900 Milky Way (West) Denver, Colo 80221	Labor Union	08/15/78	3,000.00

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1978 (continued)

Itemized Receipts

<u>Contributor</u>	<u>Occupation</u>	<u>Date</u>	<u>Amount</u>
Carp Dist Council Denver 3850 Mariposa Denver, Colo	Labor Council	08/16/78	\$1,500.00
		09/27/78	1,000.00
		10/10/78	2,500.00
		01/18/78	1,000.00
Carp Drywall Local 1391 3357 S Bannock Denver, Colo 80110	Labor Union	09/05/78	500.00
Carpenters Local 1360 Box 519 Steamboat Sprgs, Colo	Labor Union	10/30/78	305.00
		09/05/78	100.00
		10/06/78	400.00
Colo Pipe Trades Assn 229 E Moreno Colo Sprgs, Colo 80903	Labor Organization	09/05/78	1,000.00
Colo Conf of Plasterers & Cement Masons 4515 West 41st Ave Denver, Colo 80212	Labor Organization	09/05/78	1,200.00
Elevator Const Local 25 1540 Emerson St Denver, Colo 80218	Labor Local	09/14/78	500.00
Plumbers Local 3 360 Acoma St Denver, Colo 80223	Labor Union	10/06/78	650.00
Colo Build & Const Trades Council Raffle Fund Account 2860 S Circle Drive Colo Sprgs, Colo 80906	Labor Council	10/11/78	2,820.00
Carpenters State Council 8790 West Colfax Denver, Colo 80215	Labor Council	10/30/78	2,500.00

81040300511

1978 (continued)

Itemized Receipts

<u>Contributor</u>	<u>Occupation</u>	<u>Date</u>	<u>Amount</u>
Operating Engineers Local 9 990 Kalamath Denver, Colo 80204	Labor Union	10/30/78	1,100.00
Carpenters Local 1583 2885 S Broadway Denver, Colo 80110	Labor Union	10/30/78	300.00
*Build & Const Trades Dept AFL-CIO	Labor Organization	06/08/78	3,000.00

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\*/ Although the Committee reports this contribution as being from the Building and Construction Trades Department of the AFL-CIO (the "Department"), reports filed by the Political Educational Fund (the "PEF"), the Department's separate segregated fund, indicate that the PEF, rather than the Department itself, made the contribution, in which case the contribution would be lawful; however, the entry would require amendment.

These reports also show that the Committee contributed an aggregate of \$1,365 for 1976; \$1,300 for 1977; and \$4,470 for 1978, to various candidates for federal offices (see Attachment 1).

Thus, these reports reveal that the Committee may have accepted contributions from labor organizations which might have been in turn used in connection with federal election activities. In order to investigate this issue further, the Office of General Counsel recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. § 441b(a) by accepting contributions from labor organizations in connection with federal elections.<sup>1/</sup>

The Committee also failed to disclose the source of its cash on hand (\$3,400.75) in its reports for 1976, as required by 2 U.S.C. § 434(b)(1) and 11 C.F.R. § 104.12. Additionally, the Committee failed to address the Commission's request that the Committee inform it as to who created it and whether it has any tie-in or relationship with any labor organization.

In an effort to obtain the information mentioned above, as well as further information pertinent to the investigation of this matter, the Office of General Counsel recommends that the Commission approve and send the attached letter, notification of reason to believe finding, and interrogatories/request for documents to the Committee.

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<sup>1/</sup> In view of the number of labor organizations which contributed, this office suggests that the Commission consider the Committee's response to this allegation prior to notifying each labor organization of the RTB finding.

81040300513

**III. Recommendations**

Based on the foregoing discussion, the Office of General Counsel recommends that the Commission:

1. Find reason to believe that the Colorado Building and Construction Trades Council Labor Registration Committee violated 2 U.S.C. § 441b(a) by accepting contributions from labor organizations in connection with federal election activities.

2. Approve and send the attached letter, notification of reason to believe finding, and interrogatories/request for documents to the Colorado Building and Construction Trades Council Labor Registration Committee.

**Attachments**

1. Respondent's Submissions
2. Letter, Notification, and Interrogatories/Request for Documents to Respondent's Counsel

2 October 1980  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel

81040300514

**ROSENBERG, MACDONALD, PATTON AND BUCKLEY**

PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

1000 COLORADO STATE BANK BUILDING

DENVER, COLORADO 80202

DONALD P. MACDONALD (0000)

DONALD P. MACDONALD, JR.  
DONALD P. MACDONALD  
JAMES C. PATTON  
MARTIN S. BUCKLEY  
DAN S. SWENSON

AREA CODE 303  
661-7070

July 9, 1980

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

ATTN: Thomas J. Haselhorst  
Assistant Staff Director  
Reports Analysis Director

RE: Colorado Building and Construction  
Trades Council Labor Registration Committee

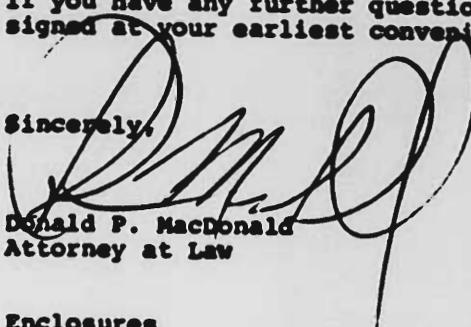
Dear Mr. Haselhorst:

Pursuant to requests of members of your staff, reports covering the years 1976 through 1978 for the above-referenced committee are enclosed herewith.

It has been, and is, our understanding that the receipts and contributions reflected by these reports were previously reported by the Colorado Committee on Political Education, Colorado Labor Council, AFL-CIO.

If you have any further questions, please contact the undersigned at your earliest convenience.

Sincerely,

  
Donald P. MacDonald  
Attorney at Law

Enclosures

cc: Colorado Building and Construction  
Trades Labor Registration Committee

DPM/llh

Attachment 1  
(17 pages)

30731574210

**FEC Form 3**  
**REVISED**  
 January, 1978  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

**REPORT OF RECEIPTS AND EXPENDITURES  
 FOR A CANDIDATE OR COMMITTEE  
 SUPPORTING CANDIDATE(S) FOR  
 NOMINATION OR ELECTION TO FEDERAL OFFICE**

(Except for Candidates or Committees Receiving Federal Matching Funds)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

**Colorado Building & Construction Trades Council, Labor Registration Committee** C00114843  
Name of Candidate or Committee (in full) Candidate/Committee

**Loc 1, Bldg 1, Rm 239, 2860 S Circle Drive**  
Address (number and street) Office Sought, State/District (if applicable)

**Colorado Springs, Colorado 80906**  
City, State and ZIP Code

Check if address is different than previously reported. Year of Election \_\_\_\_\_

4 Type of Report (check appropriate boxes)

April 15 Quarterly Report  Tenth day report preceding \_\_\_\_\_ election  
(primary, general or convention)  Termination Report

July 15 Quarterly Report on \_\_\_\_\_ in the State of \_\_\_\_\_  
(date)  Amendment for:

October 15 Quarterly Report  Thirtieth day report following \_\_\_\_\_ election  
(primary, general or convention) (which report)

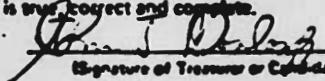
January 31 Annual Report

Monthly Report \_\_\_\_\_ on \_\_\_\_\_ in the State of \_\_\_\_\_  
(month) (date)

This is a report for  Primary Election  General Election  Primary and General  Other (special, runoff, etc.)

**SUMMARY OF RECEIPTS AND EXPENDITURES**  
(Figures may be rounded to nearest dollar.)

5 Covering Period	Column A This Period	Column B Calendar Year-To-Date
Jan 1, 1978 Through Dec 31, 1978		
6 Cash on hand January 1, 1978		\$ 8,442.60
7 Cash on hand at beginning of reporting period	\$ 8,442.60	
8 Total receipts from line 10B	\$29,420.00	\$ 29,420.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$37,862.60	\$ 37,862.60
9 Total expenditures from line 23A	\$ 4,470.00	\$ 4,470.00
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$33,392.60	\$ 33,392.60
11 Value of commodities on hand to be liquidated <small>(Attach itemized list)</small>	\$ none	
12 Debts and obligations owed to the Committee/Candidate (transize all on Schedule C)	\$ none	
13 Debts and obligations owed by the Committee/Candidate (transize all on Schedule C)	\$ none	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.  
 May 23, 1980 John J. Donlon  
(Date) (Typed Name of Treasurer or Candidate)   
(Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g or Section 441j (see reverse side of form).

For further information, contact:



Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

or call 800/424-9630

Approved by GAO  
 8-187670 (R0506)  
 Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.



**SCHEDULE A**  
**REVISED**  
 January, 1978  
 Federal Election Commission  
 132 - K Street, N.W.  
 Washington, D.C. 20543

**ITEMIZED RECEIPTS**

(Contributions, Transfers, Contribution in-Kind,  
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
 of FEC FORM 3

Page 1 of 2 for

Line Number 8

(Use Separate Schedules for  
 each numbered line)

Name of Candidate or Committee in Full

**Colo Build & Const Trades Council, Labor Registration Committee**

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt (this Period)
People For Haskell Denver Colo	Occupation	2-20-78	100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year-To-Date ... \$	
Asbestos Workers Local 28 1540 Emerson St Denver, Colo 80218	1540 Emerson St Occupation Labor Union	3-7-78 4-12-78 6-23-78 7-12-78	50.00 50.00 50.00 50.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year-To-Date ... \$	
Same as above	Occupation	8-8-78 9-19-78 10-18-78 11-20-78	50.00 50.00 50.00 50.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year-To-Date ... \$	
Millwrights Local 2834 900 Milky Way(West) Denver, Colo 80221	900 West Milky Way Occupation LABOR Union	8-15-78	3,000.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year-To-Date ... \$	
Joseph Newell Route 2 Hotchkiss, Colo	Occupation	8-15-78	2.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year-To-Date ... \$	
Build & Const Trades Dept AFL CIO 815 16th St N W Room 603 Washington, D C 20006	815 16th St N W Room 603 Occupation Labor Organization	6-8-78	3,000.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year-To-Date ... \$	
Carp Dist Council Denver 3850 Mariposa Denver, Colo	3850 Mariposa Occupation Labor Council	8-16-78 9-27-78 10-10-78 1-18-78	1,500.00 1,000.00 2,500.00 1,000.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year-To-Date ... \$	
SUBTOTAL of receipts (this page included) .....			\$
TOTAL of all receipts (last page this line number only) .....			\$

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GENERAL A  
 REVISED  
 January, 1978  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20540

**ITEMIZED RECEIPTS**

(Contributions, Transfers, Contribution In-Kind,  
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
 of FEC FORM 3

Page 2 of 4 for  
 §  
 Line Number \_\_\_\_\_

(Use Separate Schedules for  
 each numbered line)

Name of Candidate or Committee in Full  
**Colo Build & Const Trades Council, Labor Registration Committee**

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt (this Period)
Elevator Const Local 25 1540 Emerson St Denver, Colo 80218	1540 Emerson St Occupation Labor Local	9-14-78	500.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Jay Advertising Co 2860 S Circl Drive Colo Sprgs, Colo 80906	2860 S Circle Drive Occupation Advertising	4-11-78 9-15-78 10-20-78	1,778.00 2,000.00 1,250.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Mr Richardson, Mr Roberts & Mr Claney Address Unknown	Occupation	10-2-78	45.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Plumbers Local 3 360 Acoma St Denver, Colo 80223	360 Acoma St Occupation Labor Union	10-6-78	650.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Mrs Dolly Brennan 5345 Quitman Denver, Colo 80212	Occupation	10-6-78	100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Colo Build & Const Trades Council Raffle Fund Account 2860 S Circle Drive Colo Sprgs, Colo 80906	2860 S Circle Drive Occupation Labor Council	10-11-78	2,820.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Charles McDonald 643 W 9th Loveland, Colo 80537	Occupation	10-20-78	50.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
SUBTOTAL of receipts this page (optional) .....			\$
TOTAL this period (last page this line number only) .....			\$

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**SCHEDULE A**  
**REVISED**  
 January, 1978  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20543

**ITEMIZED RECEIPTS**  
 (Contributions, Transfers, Contribution in-Kind,  
 Other Income, Loans, Refunds)  
 Supporting Lines 14a, 15a, 15b, 16a, 16b, 17a, and/or 18a  
 of FEC FORM 3

Page 4 of 4 for  
 Line Number 8

(Use Separate Schedules for  
 each numbered line)

Name of Candidate or Committee in Full  
**Colo Build & Const Trades Council, Labor Registration Committee**

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Operating Engineers Local 9 990 Kalamath Denver, Colo 80204	990 Kalamath Occupation <b>Labor Union</b>	10-30-78	1,100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Carpenters Local 1583 2885 S Broadway Denver, Colo 80110	2885 S Broadway Occupation <b>Labor Union</b>	10-30-78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Woodrow Eggers Missouri	Occupation	10-30-78	10.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Carpenters State Council 8790 West Colfax Denver, Colo 80215	8790 West Colfax Occupation <b>Labor Council</b>	10-30-78	2,500.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
<b>SUBTOTAL of receipts this page (attach sheet)</b>			\$
<b>TOTAL this period (last page this line number only)</b>			\$ 29,420.00

10031301215

**SCHEDULE B**  
**REVISED**  
 January, 1978  
 Federal Election Commission  
 1825 K Street, N.W.  
 Washington, D.C. 20009

**ITEMIZED EXPENDITURES**  
 (Operating, Transfers Out, Contributions In-Kind,  
 Loans, Loan Repayments and Refunds Made)  
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c  
 of FEC FORM 3

Page 1 of 1 for  
 Line Number       

(Use Separate Schedules for  
 each numbered line)

Name of Candidate or Committee in Full  
**Colo Build & Const Trades Council, Labor Registration Committee**

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Gerry Frank for Congress Denver, Colo	Contribution	6-2-78	100.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Tim Wirth for Congress Denver, Colo	Contribution	6-2-78 9-27-78	120.00 200.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Kogovsek for Congress Pueblo, Colo	Contribution	6-8-78	3,000.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
People for Haskell Denver, Colo	Contribution	9-14-78 9-27-78	250.00 200.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Schroeder for Congress 1440 High St Denver, Colo	Contribution	9-27-78	200.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Morgan Smith for Congress Denver, Colo	Contribution	9-27-78	200.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Gerry Frank for Congress Denver, Colo	Contribution	9-27-78	200.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional) .....			\$ 4,470.00
TOTAL this period (last page this line number only) .....			\$ 4,470.00

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**FEC FORM 3**  
**REVISED**  
 January, 1978  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

**REPORT OF RECEIPTS AND EXPENDITURES  
 FOR A CANDIDATE OR COMMITTEE  
 SUPPORTING CANDIDATE(S) FOR  
 NOMINATION OR ELECTION TO FEDERAL OFFICE**

(Except for Candidates or Committees Receiving Federal Matching Funds)

**RECEIVED**

80 JUL 14 P2:20

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

Colorado Building & Construction  
Trades Council, Labor Registration Committee P.O. No. C00114843  
 Name of Candidate or Committee (in full) Candidate/Committee  
Loc 1, Bldg 1, Rm 239, 2860 S Circle Drive  
 Address (number and street) Office Sought, State/District (if applicable)  
Colorado Springs, Colorado 80906  
 City, State and ZIP Code  Check if address is different than previously reported. Year of Election \_\_\_\_\_

4 Type of Report (check appropriate boxes)

- April 10 Quarterly Report  Tenth day report preceding \_\_\_\_\_ election (primary, general or convention)  Termination Report  
 July 10 Quarterly Report on \_\_\_\_\_ in the State of \_\_\_\_\_  Amendment for: \_\_\_\_\_  
 October 10 Quarterly Report  Thirtieth day report following \_\_\_\_\_ election (which report)  
 January 31 Annual Report (primary, general or convention)  
 Monthly Report \_\_\_\_\_ on \_\_\_\_\_ in the State of \_\_\_\_\_ (month) (date)

This is a report for  Primary Election  General Election  Primary and General  Other (special, runoff, etc.)

**SUMMARY OF RECEIPTS AND EXPENDITURES**

(Figures may be rounded to nearest dollar.)

5 Covering Period	Column A This Period	Column B Calendar Year-To-Date
Jan 1, 1977 Through Dec 31, 1977		
6 Cash on hand January 1, 1977		\$ 6,095.25
7 Cash on hand at beginning of reporting period	\$6,095.25	
8 Total receipts from line 100	\$3,647.35	\$ 3,647.35
9a Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$9,742.60	\$ 9,742.60
9 Total expenditures from line 200	\$1,300.00	\$ 1,300.00
10 Cash on hand at close of reporting period (Subtract line 9 from line 9a)	\$8,442.60	\$ 8,442.60
11 Value of contributions on hand to be liquidated (Attach schedule list)	\$ none	
12 Debts and obligations owed to the Committee/Candidate (Itemize all on Schedule C)	\$ none	
13 Debts and obligations owed by the Committee/Candidate (Itemize all on Schedule C)	\$ none	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

May 23, 1980

(Date)

John J. Donlon

(Typed Name of Treasurer or Candidate)

John J. Donlon  
 (Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 461j (see reverse side of form).

For further information, contact:



Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

or call 800/424-9530

Approved by GAO  
 B-187620 (R3506)  
 Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

**DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES**  
(Page 2, FEC FORM 3)

Colorado

NAME OF CANDIDATE OR COMMITTEE	REPORT COVERING THE PERIOD	
Walter Ruil & Const Trades Council	FROM: Jan 1, 1977	TO: Dec 31, 1977
RECEIPTS	Column A This Period	Column B Calendar Year-To-Date
14. Contributions from individuals (including contributions in-kind):		
(a) Itemized (see Schedule A) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Sales and collections included above:		
List by event on memo Schedule D 05 _____ 1		
(d) Subtotal of contributions from individuals .....	\$ .....	\$ .....
15. Transfers from Political Committees:		
(a) Funds from affiliated/authorized committee (itemize on Schedule A		
regardless of amount) .....	\$ .....	
(b) Funds from other committees (itemize on Schedule A regardless of amount) .....	\$ .....	
(c) Contributions in-kind from political committees		
(itemize on Schedule A regardless of amount) .....	\$ .....	
(d) Subtotal of transfers in and contributions in-kind from political committees .....	\$ .....	\$ .....
16. Other Income:		
(a) Itemized (see Schedule A) .....	\$ 3,647.35 .....	
(b) Unitemized .....	\$ .....	
(c) Subtotal of other income .....	\$ .....	\$ 3,647.35
17. Loans and Loan Repayments Received:		
(a) Itemized (see Schedule A) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Subtotal of loans and loan repayments received .....	\$ .....	\$ .....
18. Refunds, Rebates, Returns of Deposits:		
(a) Itemized (see Schedule A) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Subtotal of refunds, rebates, returns of deposits .....	\$ .....	\$ .....
19. Total Receipts .....	\$ 3,647.35	\$ 3,647.35
<b>EXPENDITURES</b>		
20. Operating Expenditures:		
(a) Itemized (see Schedule B) .....	\$ 1,300.00 .....	
(b) Unitemized .....	\$ .....	
(c) Subtotal of operating expenditures .....	\$ 1,300.00	\$ 1,300.00
21. Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (see Schedule B) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Subtotal of loans and loan repayments made and contribution refunds .....	\$ .....	\$ .....
22. Transfers Out to Political Committees:		
(a) To affiliated/authorized committee (itemize on Schedule B regardless		
of amount) .....	\$ .....	
(b) To other committees (itemize on Schedule B regardless of amount) .....	\$ .....	
(c) Contributions in-kind to other committee		
(itemize on Schedule B regardless of amount) .....	\$ .....	
(d) Subtotal of transfers out .....	\$ .....	\$ .....
23. Independent Expenditures (see Schedule E) .....	\$ .....	\$ .....
24. Coordinated Expenditures Made by Political Committee (2 U.S.C. 441(d))		
(itemize on Schedule F) .....	\$ .....	\$ .....
25. Total Expenditures .....	\$ 1,300.00	\$ 1,300.00
<b>RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES</b>		
26. Total Receipts (from line 19) .....	\$ 3,647.35	
27. Transfers in (from line 15(d)) .....	\$ .....	
28. Net Receipts (subtract line 27 from line 26) .....	\$ 3,647.35	
29. Total Expenditures (from line 25) .....	\$ 1,300.00	
30. Transfers Out (from line 22(d)) .....	\$ .....	
31. Net Expenditures (subtract line 30 from line 29) .....	\$ 1,300.00	



**SCHEDULE A**  
**REVISED**  
 January, 1978  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

**ITEMIZED RECEIPTS**  
 (Contributions, Transfers, Contribution in-Kind,  
 Other Income, Loans, Refunds)  
 Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
 of FEC FORM 3

Page 2 of 2 for  
 Line Number 8

(Use Separate Schedules for  
 each numbered line)

Name of Candidate or Committee in Full <b>Colo Build &amp; Const Trades Council Labor Registration Committee</b>			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<b>Millwrights Local 2834 900 West Milky Way Denver, Colo 80221</b>	<b>900 West Milky Way</b>	<b>5-2-77</b>	<b>1,000.00</b>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
<b>People For Haskell 3654 Michigan St Colo Sprgs, Colo</b>		<b>10-28-77</b>	<b>100.00</b>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
<b>People For Haskell Denver, Colo</b>		<b>12-7-77</b>	<b>100.00</b>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
<b>SUBTOTAL of receipts this page (optional) .....</b>			<b>\$ 3,647.35</b>
<b>TOTAL this period from page this line number only! .....</b>			<b>\$ 3,647.35</b>

3 7 7 1 3 2 1 2

**SCHEDULE B**  
**REVISED**  
 January, 1978  
 Federal Election Commission  
 1335 H Street, N.W.  
 Washington, D.C. 20543

**ITEMIZED EXPENDITURES**  
 (Operating, Transfer Out, Contributions in-Kind,  
 Loans, Loan Repayments and Refunds Made)  
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c  
 of FEC FORM 3

Page 1 of 1 for  
 Line Number 3  
 (Use Separate Schedules for  
 each numbered line)

Name of Candidate or Committee in Full

**Colo Build & Const Trades Council, Labor Registration Committee**

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
People For Haskell 3654 Michigan St Colo Sprgs, Colo	Contribution Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	8-24-77	100.00
People For Haskell Denver, Colo	Contribution Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	11-17-77	100.00
Schroeder For Congress 1440 High St Denver, Colo	Contribution Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	10-4-77	100.00
Kogovsek for Congress Pueblo, Colo	Contribution Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	12-23-77	1,000.00
SUBTOTAL of expenditures this page (optional) .....			\$ 1,300.00
TOTAL this period (last page this line number only) .....			\$ 1,300.00

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FEC FORM 3  
 REVISED  
 January, 1978  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

**REPORT OF RECEIPTS AND EXPENDITURES  
 FOR A CANDIDATE OR COMMITTEE  
 SUPPORTING CANDIDATE(S) FOR  
 NOMINATION OR ELECTION TO FEDERAL OFFICE**

(Except for Candidates or Committees Receiving Federal Matching Funds)

RECEIVED

80 JUL 14 P 2

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

Colorado Building & Construction  
Trades Council, Labor Registration Committee P.O. No. C00114843  
 Name of Candidate or Committee (in full) Candidate/Committee  
Loc 1, Bldg 1, Rm 239, 2860 S Circle Drive  
 Address (number and street) Office Sought, State/District (if applicable)  
Colorado Springs, Colorado 80906  
 City, State and ZIP Code  Check if address is different than previously reported Year of Election \_\_\_\_\_

4 Type of Report (check appropriate boxes)

April 10 Quarterly Report  Tenth day report preceding \_\_\_\_\_ election (primary, general or convention)  Termination Report

July 10 Quarterly Report on \_\_\_\_\_ in the State of \_\_\_\_\_  Amendment for: \_\_\_\_\_ (date)

October 10 Quarterly Report  Thirtieth day report following \_\_\_\_\_ election (which report?) (primary, general or convention)

January 31 Annual Report  Monthly Report \_\_\_\_\_ on \_\_\_\_\_ in the State of \_\_\_\_\_ (month) (date)

This is a report for  Primary Election  General Election  Primary and General  Other (Special, runoff, etc.)

**SUMMARY OF RECEIPTS AND EXPENDITURES**  
 (Figures may be rounded to nearest dollar.)

5 Covering Period <u>Jan 1, 1976</u> Through <u>Dec 31, 1976</u>	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 1976 .....		\$ 3,400.75
7 Cash on hand at beginning of reporting period .....	\$ 3,400.75	
8 Total receipts (from line 18) .....	\$ 4,059.50	\$ 4,059.50
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B) .....	\$ 7,460.25	\$ 7,460.25
9 Total expenditures (from line 25) .....	\$ 1,365.00	\$ 1,365.00
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a) .....	\$ 6,095.25	\$ 6,095.25
11 Value of contributed items on hand to be liquidated (Attach itemized list) .....	\$ none	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C) ..	\$ none	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C) ..	\$ none	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

May 23, 1980

John J. Donlon

(Date)

(Typed Name of Treasurer or Candidate)

*John J. Donlon*  
 (Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g or Section 461; (see reverse side of form).

For further information, contact:



Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

or call 800/424-9530

Approved by GAO  
 B-187620 (R3506)  
 Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

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**DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES**  
(Page 2, FEC FORM 3)

Colorado

NAME OF CANDIDATE OR COMMITTEE Build & Const Trades Council		REPORT COVERING THE PERIOD FROM: Jan 1, 1976 TO: Dec 31, 1976	
RECEIPTS		Column A This Period	Column B Calendar Year-To Date
14. Contributions from individuals including contributions in-kind:			
(a) Itemized (use Schedule A) .....	\$ .....		
(b) Unitemized .....	\$ .....		
(c) Sales and collections included above: List by event on memo Schedule D (S _____ )			
(d) Subtotal of contributions from individuals .....	\$ .....	\$ .....	
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount) .....	\$ .....		
(b) Funds from other committees (itemize on Schedule A regardless of amount) .....	\$ .....		
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount) .....	\$ .....		
(d) Subtotal of transfers in and contributions in-kind from political committees .....	\$ .....	\$ .....	
16. Other Income:			
(a) Itemized (use Schedule A) .....	\$ 4,059.50		
(b) Unitemized .....	\$ .....		
(c) Subtotal of other income .....	\$ .....	\$ 4,059.50	
17. Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A) .....	\$ .....		
(b) Unitemized .....	\$ .....		
(c) Subtotal of loans and loan repayments received .....	\$ .....	\$ .....	
18. Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A) .....	\$ .....		
(b) Unitemized .....	\$ .....		
(c) Subtotal of refunds, rebates, returns of deposits .....	\$ .....	\$ .....	
19. Total Receipts .....	\$ 4,059.50	\$ 4,059.50	
EXPENDITURES			
20. Operating Expenditures:			
(a) Itemized (use Schedule B) .....	\$ 1,365.00		
(b) Unitemized .....	\$ .....		
(c) Subtotal of operating expenditures .....	\$ 1,365.00	\$ 1,365.00	
21. Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B) .....	\$ .....		
(b) Unitemized .....	\$ .....		
(c) Subtotal of loans and loan repayments made and contribution refunds .....	\$ .....	\$ .....	
22. Transfers Out to Political Committees:			
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount) .....	\$ .....		
(b) To other committees (itemize on Schedule B regardless of amount) .....	\$ .....		
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount) .....	\$ .....		
(d) Subtotal of transfers out .....	\$ .....	\$ .....	
23. Independent Expenditures (use Schedule E) .....	\$ .....	\$ .....	
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 4410d) (itemize on Schedule F) .....	\$ .....	\$ .....	
25. Total Expenditures .....	\$ 1,365.00	\$ 1,365.00	
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19) .....	\$ 4,059.50		
27. Transfers In (from line 15(c)) .....	\$ .....		
28. Net Receipts (Subtotal line 27 from line 26) .....	\$ 4,059.50		
29. Total Expenditures (from line 25) .....	\$ 1,365.00		
30. Transfers Out (from line 22(c)) .....	\$ .....		
31. Net Expenditures (Subtotal line 30 from line 29) .....	\$ 1,365.00		

GENERAL A  
 REVISED  
 January, 1978  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

**ITEMIZED RECEIPTS**  
 (Contributions, Transfers, Contribution in-Kind,  
 Other Income, Loans, Refunds)  
 Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
 of FEC FORM 3

Page 1 of 1 for  
 Line Number 8  
 Also Expense Schedules for  
 each numbered line!

Name of Candidate or Committee in Full <b>Colo Build &amp; Const Trades Council, Labor Registration Committee</b>			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Plumbers Local 3 360 Acoma St., Room 316 Denver, Colo 80223	360 Acoma St	7-22-76	\$50.00
	Occupation LABOR UNION	8-10-76	50.00
		9-13-76	50.00
		10-22-76	50.00
		10-12-76	50.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Jay Advertising Co 2860 S Circle Drive Colorado Springs, Colo 80906	2860 S Circle Drive	8-10-76	\$1,862.50
	Occupation Advertising Co		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Asbestos Workers Local 28 1540 Emerson St Denver, Colo 80218	1540 Emerson St	8-10-76	\$ 250.00
	Occupation LABOR UNION	9-13-76	50.00
		10-12-76	50.00
		11-12-76	50.00
		12-3-76	39.50
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Colo State Council of Carp 4050 Templeton Gap Blvd Colorado Springs, Colo 80907	4050 Templeton Gap Blvd	10-27-76	\$ 100.00
	Occupation LABOR COUNCIL	11-29-76	800.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Plumbers Local 3 360 Acoma St, Room 316 Denver, Colo 80223	360 Acoma St	11-8-76	\$ 50.00
	Occupation LABOR UNION	12-3-76	50.00
		12-10-76	145.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Carpetlayers Local 419 360 Acoma St Denver, Colo 80223	360 Acoma St	12-21-76	\$ 62.50
	Occupation LABOR UNION		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Asbestos Workers Local 28 1540 Emerson St Denver, Colo 80218	1540 Emerson St	12-3-76	\$ 50.00
	Occupation LABOR UNION		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
SUBTOTAL of receipts this page (optional) .....			\$ 4,057.50
TOTAL this period last page this line number only .....			\$ 4,057.50

30711574217

GENERAL S  
REVISED  
January, 1976  
Federal Election Commission  
1225 K Street, N.W.  
Washington, D.C. 20543

**ITEMIZED EXPENDITURES**  
(Operating, Transfer Out, Contributions to-Kind,  
Loans, Loan Repayments and Refunds Made)  
Supporting Lines 20a, 21a, and 22a, 22b, and 22c  
of FSC FORM 3

Page 1 of 1 for  
Line Number \_\_\_\_\_

Use Separate Schedules for  
each numbered line

Name of Candidate or Committee in Full

**Colo Build & Const Trades Council, Labor Registration Committee**

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Gradishar For Congress 601 W Pitkin Ave Pueblo, Colo	Contribution to Campaign	8-19-76	\$100.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Pat Schroeder For Congress Denver, Colo 1440 High St	Contribution to Campaign	8-31-76 9-13-76	\$ 50.00 49.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Dan Ogden for Congress 1812 Seminole Drive Fort Collins, Colo	Contribution to Campaign	10-22-76 10-28-76	\$ 50.00 500.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Dorothy Hores for Congress 6619 S Lincoln St Littleton, Colo	Contribution to Campaign	10-22-76 10-28-76	\$100.00 500.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Dr Harvey Phelps for Congress 2424 J Greenwood Pueblo, Colo	Contribution to Campaign	10-28-76	\$ 25.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures (the page left and)			\$ 1365.00
TOTAL (the period last page the line number only)			\$ 1,365.00

Last page of  
Attachment 1



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Donald P. MacDonald, Esquire  
Hornbein, MacDonald, Fattor -  
and Buckley, P.C.  
1900 Colorado State Bank Building  
Denver, Colorado

Re: MUR 1150

Dear Mr. MacDonald:

The Federal Election Commission notified your client, the Colorado Building and Construction Trades Council Labor Registration Committee (the "Committee"), in a letter dated June 25, 1980, that the Commission found reason to believe that the Committee violated the Federal Election Campaign Act of 1971, as amended ("the Act"), specifically 2 U.S.C. § 433 and § 434.

Upon further review of the information available to the Commission, the Commission determined on , 1980, that there is reason to believe that your client violated 2 U.S.C. § 441b(a) by accepting contributions from labor organizations in connection with federal election activities. A report on the Commission's additional finding is enclosed for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

Please submit answers/documents to the enclosed interrogatories/request for documents within fifteen days of your receipt of this letter. In the absence of any additional information which demonstrates that no further action should be taken against your client, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

Attachment 2

81040300532

Donald P. MacDonald  
Page Two

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter at (202)523-4529.

Sincerely,

Enclosures

1. Notification of Reason to Believe Finding
2. Interrogatories/Request for Documents

61040300533

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE:

MUR NO: 1150  
STAFF MEMBER(S) & TEL. NO.  
Carolyn Weeder (202)523-4529

RESPONDENT: Colorado Building and Construction Trades  
Council Labor Registration Committee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On August 3, 1979, the Commission determined that there was reason to believe that the Committee violated 2 U.S.C. § 433 by failing to timely register as a political committee. Additionally, on June 25, 1980, the Commission found reason to believe that the Committee had violated 2 U.S.C. § 434 by failing to report its receipts and disbursements for 1977-78.

Accordingly, the Commission notified the Committee of the reason to believe findings. In the letter which accompanied this notification, the Commission also requested that the Committee submit additional information as to who created the Committee and whether it has any tie-in or relationship with any labor organization, and, if so, what that tie-in or relationship is.

On July 9, 1980, the Committee submitted reports of its receipts and disbursements for 1976, 1977, and 1978, as requested by the Commission. These reports disclose additional possible violations.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 441b(a) prohibits political committees from accepting contributions from any labor organization in connection with federal elections. However, the reports of receipts and disbursements for 1976, 1977, and 1978, recently submitted by the Committee disclose receipts of contributions from various labor organizations. These contributions are listed on the following four pages.

81040300534

1976 - Schedule A

Itemized Receipts

81040300535

<u>Contributor</u>	<u>Occupation</u>	<u>Date</u>	<u>Amount</u>
Plumbers Local 3 360 Acoma St., Room 316 Denver, Colo 80223	Labor Union	07/22/76	\$ 50.00
		08/10/76	50.00
		09/13/76	50.00
		10/22/76	300.00
		10/12/76	50.00
		11/08/76	50.00
		12/03/76	50.00
		12/10/76	145.00

Asbestos Workers Local 28 1540 Emerson St. Denver, Colo 80218	Labor Union	08/10/76	\$250.00
		09/13/76	50.00
		10/12/76	50.00
		11/12/76	50.00
		12/03/76	39.50
		12/03/76	50.00

Colo State Council of Carp 4050 Templeton Gap Blvd Colorado Springs, Colo 80907	Labor Council	10/27/76	\$100.00
		11/29/76	800.00

Carpetlayers Local 419 360 Acoma St. Denver, Colo 80223	Labor Union	12/21/76	\$ 62.50
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1977

Asbestos Workers Local 28 1540 Emerson St. Denver, Colo 80218	Labor Union	01/24/77	\$ 50.00
		02/10/77	50.00
		03/14/77	50.00
		04/18/77	50.00
		05/18/77	50.00
		06/24/77	50.00
		07/29/77	50.00
		09/12/77	50.00
		10/06/77	50.00
		11/07/77	50.00
		12/07/77	50.00

1977 (continued)

Itemized Receipts

<u>Contributor</u>	<u>Occupation</u>	<u>Date</u>	<u>Amount</u>
Plumbers Local 3 360 Acoma St. Room 316 Denver, Colo. 80223	Labor Union	01/24/77	\$ 50.00
		05/18/77	50.00
		07/11/77	100.00
		08/15/77	50.00
		10/06/77	50.00
		10/28/77	50.00
Electricians Local 68 5660 Logan Denver, Colo 80216	Labor Union	05/18/77	50.00
Carp Dist Council of Denver 3850 Mariposa Denver, Colo 80211	Labor Union Council	05/18/77	1,000.00
		07/11/77	100.00
Millwrights Local 2834 900 West Milky Way Denver, Colo 80221	Labor Union	06/02/77	1,000.00
<u>1978</u>			
Asbestos Workers Local 28 1540 Emerson St. Denver, Colo 80218	Labor Union	03/07/78	50.00
		04/12/78	50.00
		06/23/78	50.00
		07/12/78	50.00
		08/08/78	50.00
		09/17/78	50.00
		10/18/78	50.00
		11/20/78	50.00
Millwrights Local 2834 900 Milky Way (West) Denver, Colo 80221	Labor Union	08/15/78	3,000.00

81040300536

1978 (continued)

Itemized Receipts

<u>Contributor</u>	<u>Occupation</u>	<u>Date</u>	<u>Amount</u>
Carp Dist Council Denver 3850 Mariposa Denver, Colo	Labor Council	08/16/78	\$1,500.00
		09/27/78	1,000.00
		10/10/78	2,500.00
		01/18/78	1,000.00
Carp Drywall Local 1391 3357 S Bannock Denver, Colo 80110	Labor Union	09/05/78	500.00
Carpenters Local 1360 Box 519 Steamboat Sprgs, Colo	Labor Union	10/30/78	305.00
		09/05/78	100.00
		10/06/78	400.00
Colo Pipe Trades Assn 229 E Moreno Colo Sprgs, Colo 80903	Labor Organization	09/05/78	1,000.00
Colo Conf of Plasterers & Cement Masons 4515 West 41st Ave Denver, Colo 80212	Labor Organization	09/05/78	1,200.00
Elevator Const Local 25 1540 Emerson St Denver, Colo 80218	Labor Local	09/14/78	500.00
Plumbers Local 3 360 Acoma St Denver, Colo 80223	Labor Union	10/06/78	650.00
Colo Build & Const Trades Council Raffle Fund Account 2860 S Circle Drive Colo Sprgs, Colo 80906	Labor Council	10/11/78	2,820.00
Carpenters State Council 8790 West Colfax Denver, Colo 80215	Labor Council	10/30/78	2,500.00

81040300537

1978 (continued)

Itemized Receipts

<u>Contributor</u>	<u>Occupation</u>	<u>Date</u>	<u>Amount</u>
Operating Engineers Local 9 990 Kalamath Denver, Colo 80204	Labor Union	10/30/78	1,100.00
Carpenters Local 1583 2885 S Broadway Denver, Colo 80110	Labor Union	10/30/78	300.00
Build & Const Trades Dept AFL-CIO	Labor Organization	06/08/78	3,000.00

81040300538

These reports also show that the Committee contributed an aggregated of \$1,365 for 1976; \$1,300 for 1977; and \$4,470 for 1978, to various candidates for federal offices.

Thus, these reports reveal that the Committee accepted contributions from labor organizations which were in turn used in connection with federal election activities. Based on the foregoing analysis, the Federal Election Commission has found reason to believe that the Committee violated 2 U.S.C. § 441b(a) by accepting contributions from labor organizations in connection with federal elections.

8 1 0 4 0 3 0 0 5 3 9

INTERROGATORIES/REQUEST FOR DOCUMENTS

1. Please provide a copy (both front and back) of the check for each contribution listed in the notification.
  
2. In the Commission's letter of June 25, 1980, the Commission requested that the Committee inform it as to who created the Committee and whether it has any tie-in or relationship with any labor organization, and, if so, what that tie-in or relationship is. As the Committee failed to respond to this request, please provide the information at this time.
  
3. 2 U.S.C. § 434(b)(1) and 11 C.F.R. § 104.12 require the disclosure of the source of "cash on hand" at the time of registration. Please disclose the source of the "cash on hand" (\$3,400.75) reported in 1976, pursuant to these provisions.

81040300540



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*  
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *MC*  
DATE: AUGUST 4, 1980  
SUBJECT: MUR 1150 - Interim Investigative Report #1  
dated 7-31-80; Signed 7-30-80; Received  
in OCS 7-31-80, 3:11

The above-named document was circulated to the  
Commission on a 24 hour no-objection basis at 2:00,  
August 1, 1980.

There were no objections to the Interim Investigative  
Report at the time of the deadline.

81040300541

July 31, 1980

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 1150

Please have the attached Interim Invest Report distributed to the Commission. Thank you.

81042300542

BEFORE THE FEDERAL ELECTION COMMISSION

July 31, 1980

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

80 JUL 31 P 3: 11

In the Matter of )  
 )  
Colorado Building and )  
Construction Trades Council )  
Labor Registration Committee )

MUR 1150

INTERIM INVESTIGATIVE REPORT #1

On June 17, 1980, the Commission approved sending a letter and a notification of reason to believe findings to the Colorado Building and Construction Trades Council Labor Registration Committee (the "Colorado Committee"). The letter restated the Commission's reason to believe findings that the Colorado Committee violated 2 U.S.C. § 433 by failing to timely register and § 434 by failing to report its receipts and disbursements for 1977-78. In addition, the letter questioned whether the Colorado Committee has any tie-in or relationship with any labor organization.

On July 14, 1980, the Commission received a correspondence from respondent authorizing Mr. Donald P. MacDonald to be its counsel in this matter. To date, counsel has not responded on behalf of the Colorado Committee. The Office of General Counsel will present a further report within three weeks.

30 July 1980  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel

81040300543



066 Sec 7996

# COLORADO BUILDING AND CONSTRUCTION TRADES COUNCIL

1540 EMERSON STREET, DENVER, COLORADO 80218  
PHONE: 303/832-6499

July 14, 1980

Mr. Mac L. Friedersdorf, Chairman  
Federal Election Commission  
1325 K. Street, N.W.  
Washington, D.C. 20463

RE: MUR 1150

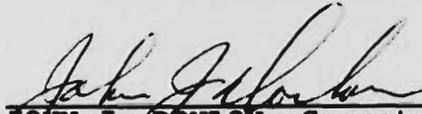
Dear Chairman:

The Colorado Building and Construction Trades Council Labor Registration Committee is represented by the law firm of Hornbein, MacDonald, Fattor and Buckley, P.C., 1900 Colorado State Bank Building, Denver, Colorado 80202 (Telephone: (303) 861-7070).

Please send any notifications or other communications from the Commission to that law firm, attention : Donald P. MacDonald, Esq.

Very truly yours,

COLORADO BUILDING AND CONSTRUCTION  
TRADES COUNCIL

  
\_\_\_\_\_  
JOHN J. DONLON, Secretary-Treasurer  
JJD/dw  
opeiu # 5 afl-cio  
CC:Donald P. MacDonald,  
Attorney at Law

445030401

**AFFILIATED CRAFTS**

- Asbestos Workers
- Boilermakers
- Bricklayers
- Carpenters
- Carpet & Linoleum
- Cement Masons
- Dry Wall
- Electrical Workers
- Elevator Constructors
- Engineers
- Glaziers
- Iron Workers
- Laborers
- Millmen
- Millwrights
- Painters
- Pipe Fitters
- Pipeliners
- Plasterers
- Plumbers
- Roofers
- Sheet Metal Workers
- Sign Painters
- Sprinkler Fitters
- Teamsters
- Tilelayers
- Tile and Terrazzo Helpers

08 JUL 22 4:09 PM

AREA OFFICES

COLORADO SPRINGS 80906  
Location 1, Building 1, Room 239  
2860 South Circle Drive  
576-6770

FT. COLLINS  
137 N. College Avenue  
484-2597

GRAND JUNCTION  
136 N. Seventh Street  
242-8067

PUEBLO  
818 E. 4th Street  
543-0233



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 25, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Anton Zafereo, Treasurer  
Colorado Building and Construction Trades  
Council Labor Registration Committee  
9 East Costilla Street  
Colorado Springs, Colorado 80903

Re: MUR 1150

Dear Mr. Zafereo:

The Federal Election Commission (the "Commission") notified you on August 3, 1979 of a reason to believe finding regarding the Colorado Building and Construction Trades Council Labor Registration Committee's violation of 2 U.S.C. § 433. On June 3, 1980, the Commission also found reason to believe that your committee violated 2 U.S.C. § 434 by failing to report receipts and disbursements for 1977-1978. The enclosed report further explains the Commission's finding regarding these violations.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. In absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

In addition, the Commission requests that you inform it as to who created your committee and whether it has any tie-in or relationship with any labor organization, and, if so, what that tie-in or relationship is. [See 11 C.F.R. § 100.5(g) and Walther v. FEC, CCH Federal Election Campaign Financing Guide ¶ 9076, at 50, 638-9(D.D.C. 1979)].

In the event that your committee is a part of the AFL-CIO structure, 2 U.S.C. § 441a(a)(2)(A) would allow your committee and the other affiliated committees to make contributions in the aggregate of \$5,000 to any candidate and his authorized political committees for any federal election.

81040300545

Letter to: Anton Zafereo, Treasurer  
Page Two

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the investigation to be made public. If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter at (202)523-4529.

Sincerely,

*Max L. Friedersdorf*  
Max L. Friedersdorf  
Chairman

cc: Donald MacDonald, Esquire

Enclosures

Procedures  
Notification of Reason to Believe Finding

81040300546

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE: June 25, 1980

MUR NO. 1150  
STAFF MEMBER(S) & TEL. NO.  
Carolyn Weeder  
(202)523-4529

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On January 21, 1980 the Reports Analysis Division ("RAD") referred to the Office of General Counsel the matter in which the Colorado Building and Construction Trades Council Labor Registration Committee (the "Colorado Committee") violated 2 U.S.C. § 433 by failing to timely register as a political committee and 2 U.S.C. § 434 by failing to report its receipts and disbursements.

FACTUAL BASIS AND LEGAL ANALYSIS

Failure to Register Timely

2 U.S.C. § 433 requires any political committee which receives contributions or makes expenditures exceeding \$1,000 during a calendar year to file a statement of organization with the Commission within 10 days after its organization or 10 days after the date on which it has information which causes the committee to anticipate it will receive contributions or make expenditures in excess of \$1,000.

During the course of normal review, RAD discovered that the Colorado Committee made the following two contributions to federal candidates aggregating \$3,120 during the 1978 calendar year:

<u>Recipient</u>	<u>Date</u>	<u>Amount</u>
Ray Kogovsek for Congress Committee	06/08/78	\$ 3,000
Committee for Tim Wirth, Inc.	06/29/78	120

81040300547

RAD sent a surface violation letter on April 9, 1979 advising the Colorado Committee that it may be a political committee subject to the requirements prescribed by 2 U.S.C. § 433 and § 434. On August 3, 1979 the Commission notified the Colorado Committee of a reason to believe finding that the Committee violated 2 U.S.C. § 433.

Although the Colorado Committee submitted a statement of organization with the Commission in October 1979, the Colorado Committee failed to register in a timely fashion.

Failure to Report Receipts and Disbursements  
as a Political Committee

2 U.S.C. § 434 requires that each treasurer of a political committee file reports of receipts and disbursements. The Commission notified the Colorado Committee of its reporting requirements in a surface violation letter of April 9, 1979. To date, the Committee has failed to file reports disclosing its activities in 1977 and 1978.

DETERMINATIONS

Based on the foregoing analysis, the Federal Election Commission has found:

1. Reason to believe that the Colorado Building and Construction Trades Council Labor Registration Committee violated 2 U.S.C. § 433 by failing to timely register as a political committee.

2. Reason to believe that the Colorado Building and Construction Trades Council Labor Registration Committee violated 2 U.S.C. § 434 by failing to report its receipts and disbursements for 1977-78.

81040300548

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Colorado Building and ) MUR 1150  
Construction Trades )  
Council Labor )  
Registration Committee )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission's executive session on June 17, 1980, do hereby certify that the Commission decided by a vote of 6-0 to approve the letter and the notification of reason to believe finding in MUR 1150 attached to the General Counsel's June 6, 1980, memorandum, subject to amendment of the third paragraph in the letter to read as follows:

In addition, the Commission requests that you inform it as to who created your committee and whether it has any tie-in or relationship with any labor organization, and, if so, what that tie-in or relationship is. [See 11 C.F.R. §100.5(g) and *Walther v. FEC*, OCH Federal Election Campaign Financing Guide ¶9076, at 50, 638-9 (D.D.C. 1979)].

Attest:

6/19/80

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary to the Commission

81040300549



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*  
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *me*  
DATE: JUNE 11, 1980  
SUBJECT: OBJECTION - MUR 1150 - Memorandum to the  
Commission dated 6-6-80 with Revised Letter  
and Notification

You were advised by memorandum on June 10, 1980 that no objection had been received to the above-named document. This was an error. Commissioner Harris had submitted an objection at 10:06, June 10, 1980.

Commissioner Harris' Executive Assistant, Judy Browning, has contacted the attorney regarding the objection.

Our apologies for any problems this may have caused your staff.

MUR 1150 will be placed on the Executive Session Agenda for Tuesday, June 17, 1980.

cc: Commissioner Harris

81040300550

BEFORE THE FEDERAL ELECTION COMMISSION

6-5  
awaiting  
new  
letter

In the Matter of )  
 )  
 Colorado Building and Construction )  
 Trades Council Labor Registration) MUR 1150  
 Committee )  
 Ray Kogovsek for Congress Committee)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on June 3, 1980, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 1150:

1. Find reason to believe that the Colorado Building and Construction Trades Council Labor Registration Committee violated 2 U.S.C. §434 by failing to report its receipts and disbursements for 1977-78.
2. Direct the Office of General Counsel to amend the letter attached to the General Counsel's May 27, 1980 report to ask for information regarding possible affiliation between the Colorado Building and Construction Trades Council Labor Registration Committee and the AFL-CIO COPE.

Commissioners Friedersdorf, Harris, McGarry, Peiche, and Tiernan voted affirmatively for the decision; Commissioner Aikens was not present at the time of the vote.

Attest:

6/5/80  
 Date

Marjorie W. Emmons  
 Marjorie W. Emmons  
 Secretary to the Commission

81040300551



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *m*  
DATE: JUNE 10, 1980  
SUBJECT: MUR 1150 - Memorandum to the Commission dated  
6-6-80, with Revision of Letter and  
Notification: Received in OCS 6-6-80, 1:53

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 11:00, Monday, June 9, 1980.

There were no objections to the revised letter and notification at the time of the deadline.

81040300552

June 6, 1980

**MEMORANDUM TO:** Marjorie W. Emons  
**FROM:** Elissa T. Garr  
**SUBJECT:** MUR 1150

Please have the attached Memo distributed to the  
Commission on a 24 hour no-objection basis. Thankyyou.

8 1 0 4 0 3 0 0 5 5 3



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

80 JUN 6 P 1: 53

June 6, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele *CS*  
General Counsel

SUBJECT: Revision of Letter and Notification;  
MUR 1150, First General Counsel's Report

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Attached for the Commission's approval are the letter and the notification of reason to believe finding in MUR 1150, First General Counsel's Report which have been re-drafted pursuant to the Commission's discussion in the Executive Session of June 3, 1980.

81040300554



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Anton Zafereo, Treasurer  
Colorado Building and Construction Trades  
Council Labor Registration Committee  
9 East Costilla Street  
Colorado Springs, Colorado 80903

Re: MUR 1150

Dear Mr. Zafereo:

The Federal Election Commission ("the Commission") notified you on August 3, 1979 of a reason to believe finding regarding the Colorado Building and Construction Trades Council Labor Registration Committee's violation of 2 U.S.C. §433. On June 3, 1980, the Commission also found reason to believe that your committee violated 2 U.S.C. §434 by failing to report receipts and disbursements for 1977-1978. The enclosed report further explains the Commission's finding regarding these violations.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. In absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

In addition, the Commission requests that you clarify if your committee is connected to the AFL-CIO or any of its local unions (See 2 U.S.C. §431(7); 11 C.F.R. §100.6); and if your committee is affiliated with the Political Educational Fund of the Building and Construction Trades Department or the AFL-CIO Committee on Political Education Political Contributions Committee or any other committees of the AFL-CIO [See 11 C.F.R. §100.5(g) and *Walther v. FEC*, CCH Federal Election Campaign Financing Guide ¶9076, at 50,638-9 (D.D.C. 1979)].

81040300555

Letter to: Anton Zafereo, Treasurer  
Page: Two

In the event that your committee is a part of the AFL-CIO structure, 2 U.S.C. §441a(a)(2)(A) would allow your committee and the other affiliated committees to make contributions in the aggregate of \$5,000 to any candidate and his authorized political committees for any federal election.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(4)(B) and §437g(a)(12)(A) unless you notify the Commission in writing that you wish the investigation to be made public. If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter at (202) 523-4529.

Sincerely,

cc: Donald MacDonald, Esquire

Enclosures

Procedures  
Notification of Reason to Bel

8  
1  
0  
4  
0  
3  
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5  
6

MAIL SERVICE: Complete items 1, 2, and 3.  
Add your address in the "ADDRESS" space.

1. The following service is requested:  
 Show to whom and date delivered.  
 Show to whom, date, and address delivered.  
 RESTRICTED DELIVERY  
Show to whom and date delivered.  
 RESTRICTED DELIVERY  
Show to whom, date, and address delivered.  
(CONSULT POSTMASTER)

2. ARTICLE ADDRESSED TO:  
Donald MacDonald, Esq.  
1900 Colorado Street  
Denver, Colorado 80202

3. ARTICLE DESCRIPTION:  
REGISTERED NO. 945289  
CERTIFIED NO. 1152

4. I have received the article described above.  
SIGNATURE: [Signature] ADDRESS: [Address]

5. DATE OF DELIVERY: 6-30-80

6. ADDRESS (Complete only if requested)

7. UNABLE TO DELIVER BECAUSE:

NEEDER 1152

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE: \_\_\_\_\_

MUR NO. 1150  
STAFF MEMBER(S) & TEL. NO.  
Carolyn Weeder  
(202) 523-4529

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On January 21, 1980 the Reports Analysis Division ("RAD") referred to the Office of General Counsel the matter in which the Colorado Building and Construction Trades Council Labor Registration Committee (the "Colorado Committee") violated 2 U.S.C. § 433 by failing to timely register as a political committee and 2 U.S.C. § 434 by failing to report its receipts and disbursements.

FACTUAL BASIS AND LEGAL ANALYSIS

Failure to Register Timely

2 U.S.C. § 433 requires any political committee which receives contributions or makes expenditures exceeding \$1,000 during a calendar year to file a statement of organization with the Commission within 10 days after its organization or 10 days after the date on which it has information which causes the committee to anticipate it will receive contributions or make expenditures in excess of \$1,000.

During the course of normal review, RAD discovered that the Colorado Committee made the following two contributions to federal candidates aggregating \$3,120 during the 1978 calendar year:

<u>Recipient</u>	<u>Date</u>	<u>Amount</u>
Ray Kogovsek for Congress Committee	06/08/78	\$ 3,000
Committee for Tim Wirth, Inc.	06/29/78	120

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RAD sent a surface violation letter on April 9, 1979 advising the Colorado Committee that it may be a political committee subject to the requirements prescribed by 2 U.S.C. § 433 and § 434. On August 3, 1979 the Commission notified the Colorado Committee of a reason to believe finding that the Committee violated 2 U.S.C. § 433.

Although the Colorado Committee submitted a statement of organization with the Commission in October 1979, the Colorado Committee failed to register in a timely fashion.

Failure to Report Receipts and Disbursements  
as a Political Committee

2 U.S.C. § 434 requires that each treasurer of a political committee file reports of receipts and disbursements. The Commission notified the Colorado Committee of its reporting requirements in a surface violation letter of April 9, 1979. To date, the Committee has failed to file reports disclosing its activities in 1977 and 1978.

DETERMINATIONS

Based on the foregoing analysis, the Federal Election Commission has found:

1. Reason to believe that the Colorado Building and Construction Trades Council Labor Registration Committee violated 2 U.S.C. § 433 by failing to timely register as a political committee.

2. Reason to believe that the Colorado Building and Construction Trades Council Labor Registration Committee violated 2 U.S.C. § 434 by failing to report its receipts and disbursements for 1977-78.

8 1 0 4 0 3 0 0 5 5 8

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Colorado Building and Construction )  
Trades Council Labor Registration )  
Committee )  
Ray Kogovsek for Congress Committee)

MUR 1150

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on June 3, 1980, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 1150:

1. Find reason to believe that the Colorado Building and Construction Trades Council Labor Registration Committee violated 2 U.S.C. §434 by failing to report its receipts and disbursements for 1977-78.
2. Direct the Office of General Counsel to amend the letter attached to the General Counsel's May 27, 1980 report to ask for information regarding possible affiliation between the Colorado Building and Construction Trades Council Labor Registration Committee and the AFL-CIO COPE.

Commissioners Friedersdorf, Harris, McGarry, Peiche, and Tiernan voted affirmatively for the decision; Commissioner Aikens was not present at the time of the vote.

Attest:

6/5/80  
Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary to the Commission

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*  
DATE: MAY 29, 1980  
SUBJECT: OBJECTION - MUR 1150 - First General Counsel's  
Report dated 5-27-80; Received in  
OCS 5-27-80, 10:51

The above-named document was circulated on a 48  
hour vote basis at 4:00, May 27, 1980.

Commissioner Aikens submitted an objection at 4:56,  
May 29, 1980, thereby placing MUR 1050 on the Executive  
Session Agenda for Tuesday, June 3, 1980.

81040300560

May 27, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1150

Please have the attached First GC Report distributed to the Commission on a 48 hour tally basis. Thankyou.

81040300561

FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20463

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

80 MAY 27 AIO: 51

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL MAY 27 1980  
BY OGC TO THE COMMISSION

MUR 1150  
STAFF MEMBER  
Carolyn Weeder

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: Colorado Building and Construction Trades  
Council Labor Registration Committee  
Ray Kogovsek for Congress Committee

RELEVANT STATUTE: 2 U.S.C. § 433, § 434, § 441a(a)(1)(A),  
§ 441a(f)

INTERNAL REPORTS CHECKED: FEC files for both committees and for the  
Political Educational Fund of the Building  
and Construction Trades Department  
Sections 3 and 5 of "G" Index for  
Kogovsek for Congress Committee

FEDERAL AGENCIES CHECKED:

BACKGROUND

On January 21, 1980 the Reports Analysis Division ("RAD") referred to the Office of General Counsel the matter in which the Colorado Building and Construction Trades Council Labor Registration Committee (the "Colorado Committee") and the Ray Kogovsek for Congress Committee (the "Kogovsek Committee") violated certain provisions of the FECA, as amended. Specifically, the Colorado Committee violated 2 U.S.C. § 433 by failing to register as a political committee; § 434 by failing to report receipts and disbursements; and § 441a(a)(1)(A) by making a contribution in excess of lawful limitations to the Kogovsek for Congress Committee, a principal campaign committee. Accordingly, the Kogovsek for Congress Committee violated 2 U.S.C. § 441a(f) by accepting the excessive contribution.

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FACTUAL BASIS AND LEGAL ANALYSIS

A. Colorado Building and Construction Trades Council Labor Registration Committee

1. Failure to Register Timely

2 U.S.C. § 433 requires any political committee which receives contributions or makes expenditures exceeding \$1,000 during a calendar year to file a statement of organization with the Commission within 10 days after its organization or 10 days after the date on which it has information which causes the committee to anticipate it will receive contributions or make expenditures in excess of \$1,000.

During the course of normal review, RAD discovered that the Colorado Committee made the following two contributions to federal candidates aggregating \$3,120 during the 1978 calendar year:<sup>1/</sup>

<u>Recipient</u>	<u>Date</u>	<u>Amount</u>
Ray Kogovsek for Congress Committee	06/08/78	\$3,000
Committee for Tim Wirth, Inc.	06/29/78	120

RAD sent a surface violation letter on April 9, 1979 advising the Colorado Committee that it may be a political committee subject to the requirements prescribed by 2 U.S.C. § 433 and § 434. On August 3, 1979 the Commission notified the Colorado Committee of a reason to believe finding that the Committee violated 2 U.S.C. § 433.

Although the Colorado Committee submitted a statement of organization with the Commission in October 1979, the Colorado Committee failed to register in a timely fashion. The Office of General Counsel will make a further recommendation regarding this violation upon receiving a response from the Colorado Committee in connection with the following issue.

2. Failure to Report Receipts and Disbursements as a Political Committee

2 U.S.C. § 434 requires that each treasurer of a political committee file reports of receipts and disbursements. The

<sup>1/</sup> We note however that the Colorado Committee had made a previous contribution of \$1,000 to the Kogovsek Committee on December 29, 1977.

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Commission notified the Colorado Committee of the reporting requirements in a surface violation letter of April 9, 1979. To date, the Committee has failed to file reports disclosing its activities in 1977 and 1978. The Office of General Counsel therefore recommends that the Commission find reason to believe that the Colorado Committee violated 2 U.S.C. § 434.

3. Contribution in Excess of Lawful Limitations

2 U.S.C. § 441a(a)(1)(A) prohibits a political committee from making contributions to any federal candidate or his authorized committees which in the aggregate exceed \$1,000 for any election.<sup>2/</sup> The Colorado Committee made two contributions to the Kogovsek for Congress Committee aggregating \$4,000, thereby exceeding the lawful limitation by \$3,000. The two contributions made toward Kogovsek's primary election are as follows:<sup>3/</sup>

<u>Date</u>	<u>Amount</u>
12/29/77	\$1,000
06/08/78	3,000

Although the Commission did not send a surface violation letter advising of the possible 2 U.S.C. § 441a(a)(1)(A) violation, a reports analyst informed counsel for the Colorado Committee of the excessive contribution.<sup>4/</sup> The Colorado Committee soon thereafter obtained a refund for the excessive amount (\$3,000) from the Kogovsek Committee.

It is important to note that the Kogovsek Committee had use of the excessive \$3,000 for the primary and general elections in 1978. Kogovsek won the general election by a narrow margin of 321 votes. The unlawful contribution therefore might have had an impact upon the outcome of the election.

<sup>2/</sup> Since the Colorado Committee does not claim to be affiliated to any multi-candidate committee, it is subject to the limitations of § 441a(a)(1)(A).

<sup>3/</sup> See pages 2 and 3 of RAD Referral.

<sup>4/</sup> See pages 7 and 10 of RAD Referral.

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Thus, the Office of General Counsel recommends finding reason to believe that the Colorado Committee violated 2 U.S.C. § 441a(a)(1)(A), and approving and sending the attached letter and notification of a reason to believe finding.

B. Ray Kogovsek for Congress Committee

1. Acceptance of Excessive Contribution

2 U.S.C. § 441a(f) makes it unlawful for a candidate or a political committee to accept any contribution in violation of the limitations set forth in the same section. The Kogovsek Committee reported receiving contributions of \$1,000 and \$3,000 from the Colorado Committee for the primary election. As previously discussed, section 441a restricts political committees to contributing a maximum of \$1,000 to any candidate or his authorized committee(s) for any federal election.

On April 9, 1979, RAD sent a surface violation letter notifying the Kogovsek Committee that the Colorado Committee had made an excessive \$3,000 contribution.

The Kogovsek Committee responded on May 25, 1979 stating that it had refunded the excessive contribution to the Colorado Committee. The Commission notified the Kogovsek Committee of a reason to believe finding on June 8, 1979.

Although the Kogovsek Committee initiated compliance actions by securing a loan to make the reimbursement, its acceptance of the excessive contribution is nevertheless in violation of 2 U.S.C. § 441a(f). However, the Office of General Counsel will make a further recommendation regarding this violation at a future date.

RECOMMENDATIONS

1. Find reason to believe that the Colorado Building and Construction Trades Council Labor Registration Committee violated 2 U.S.C. § 434 by failing to report its receipts and disbursements for 1977-78.

2. Find reason to believe that the Colorado Building and Construction Trades Council Labor Registration Committee violated 2 U.S.C. § 441a(a)(1)(A) by making a contribution in excess of lawful limitations.

3. Send the attached letter and notification of reason to believe findings to the Colorado Building and Construction Trades Council Labor Registration Committee.

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**Attachments**

1. Letter to Mr. Anton Zafereo, Treasurer; Colorado Building and Construction Trades Council Labor Registration Committee, with notification of reason to believe findings.
2. RAD Referrals
3. RAD Update

8 1 0 4 0 3 0 0 5 6 6



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Anton Zafereo, Treasurer  
Colorado Building and Construction Trades  
Council Labor Registration Committee  
9 East Costilla Street  
Colorado Springs, Colorado 80903

Re: MUR 1150 Colorado Building  
and Construction Trades Council  
Labor Registration Committee

Dear Mr. Zafereo:

This is to advise you that on 1980, the Federal Election Commission found reason to believe that the Colorado Building and Construction Trades Council Labor Registration Committee violated 2 U.S.C. § 434 by failing to report receipts and disbursements and 2 U.S.C. § 441a(a)(1)(A) by making a contribution to the Ray Kogovsek for Congress Committee in excess of lawful limitations. The enclosed report further explains the Commission's findings regarding these violations.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In absence of any additional information which demonstrates that no further action should be taken against your committee the Commission may proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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Letter to: Anton Zafereo  
Page: Two

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the investigation to be made public. If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter at (202)523-4529.

Sincerely,

cc: Donald MacDonald, Esquire

Enclosures

Procedures  
Notification of Reason to Believe Finding

8 1 0 4 0 3 0 0 5 6 8

FEDERAL ELECTION COMMISSION

NOTIFICATION OF POSSIBLE VIOLATION

DATE: \_\_\_\_\_

MJR NO. 1150  
STAFF MEMBER(S) & TEL. NO.  
Carolyn Weeder  
(202)523-4529

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On January 21, 1980 the Reports Analysis Division ("RAD") referred to the Office of General Counsel the matter in which the Colorado Building and Construction Trades Council Labor Registration Committee (the "Colorado Committee") may have violated 2 U.S.C. § 434 by failing to report its receipts and disbursements and 2 U.S.C. § 441a(a)(1)(A) by making a contribution in excess of lawful limitations.

FACTUAL BASIS AND LEGAL ANALYSIS

Failure to Report Receipts and Disbursements  
as a Political Committee

2 U.S.C. § 434 requires that each treasurer of a political committee file reports of receipts and disbursements. The Commission notified the Colorado Committee of its reporting requirements in a surface violation letter of April 9, 1979. To date, the Committee has failed to file reports disclosing its activities in 1977 and 1978.

Contribution in Excess of Lawful Limitations

2 U.S.C. § 441a(a)(1)(A) prohibits a political committee from making contributions to any federal candidate or his authorized committees which in the aggregate exceed \$1,000 per election cycle. The Committee made two contributions to the Kogovsek for Congress Committee aggregating \$4,000 in an election cycle, thereby exceeding the lawful limitation by

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\$3,000. The two contributions made toward Kogovsek's primary election are as follows:

<u>Election</u>	<u>Date</u>	<u>Amount</u>
Primary	12/29/77	\$1,000
Primary	06/08/78	\$3,000

Although the Commission did not send a surface violation letter advising of the possible 2 U.S.C. § 441a(a)(1)(A) violation, a reports analyst informed counsel retained by the Colorado Committee of the excessive contribution to the Kogovsek Committee. The Colorado Committee soon thereafter obtained a refund for the excessive amount (\$3,000) from the Kogovsek Committee.

DETERMINATIONS

Based on the foregoing analysis, the Federal Election Commission has found:

1. Reason to believe that the Colorado Building and Construction Trades Council Labor Registration Committee violated 2 U.S.C. § 434 by failing to report its receipts and disbursements for 1977-78.

2. Reason to believe that the Colorado Building and Construction Trades Council Labor Registration Committee violated 2 U.S.C. § 441a(a)(1)(A) by making a contribution in excess of lawful limitations.

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**REPORTS ANALYSIS REFERRAL SHEET**

DATE January 21, 1980 ANALYST Kevin Kelly  
 TO: Office of General Counsel TEAM CHIEF Steve Mims  
 THROUGH: STAFF DIRECTOR APP. COMPLIANCE REVIEW cdg  
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

CANDIDATE/COMMITTEE: Colorado Building and Construction Trades Council Labor Registration Committee

TREASURER: Anton Zafereo  
 ADDRESS: 9 East Costilla St.  
 Colorado Springs, CO 80903

1150

AFFILIATE(S): N/A

ALLEGATION(S): Failure to timely register and file reports. Excessive Contribution  
 CITE: 2 U.S.C. 433 and 2 U.S.C. 434 2 U.S.C. 441a  
 ATTACHMENT(S) #2

DATE INITIATED: April 9, 1979

MANNER IN WHICH REVIEW WAS INITIATED:

- Normal Review       Other:  
 Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM N/A TO N/A  
 TOTAL RECEIPTS \$ N/A TOTAL EXPENDITURES \$ N/A  
 CASH ON HAND \$ N/A DEBTS \$ N/A

**HISTORY:**

RESULTS OF REVIEW: ATTACHMENT  
 Excessive Contribution made 6/8/78 #2  
 Surface Violation sent for failure to register 4/9/79 #3  
 Excessive Contribution refunded 5/14/79 #4  
 Reason to Believe Notice sent 8/3/79 #5  
 Committee registers 10/25/79 #6  
 COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT  
 Telecon 5/14/79 #7  
 Telecon 8/16/79 #8

REASON(S) FOR REFERRAL: ATTACHMENT

Presently, there is no minimum threshold for referrals concerning late registrations. In addition, the excessive contribution was made to an election that was decided by only 321 votes. #9

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT

Referral of the Kogovsek Committee

OTHER RELEVANT INFORMATION: ATTACHMENT

To date, the referred committee has not filed any reports of receipts and expenditures. Also, it appears that the Kogovsek for Congress Committee took out a bank loan in order to refund the money to the referred committee. #10

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

SEE REFERRAL FOR RAY KOGOVSEK FOR CONGRESS

Attachment 2  
Part A

Contributions, Ticket Purchases, Loans, Debts, and Transfers for Line  
Numbers 15, 16, 17 and/or 18 of FEC Form 3  
(see instructions on back)

Other amounts contributed for each  
candidate listed

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Name of Candidate or Committee in full		Date (month, day, year)	Amount of each receipt this period
✓ <b>AT</b> S. GUYER FOR CONGRESS			
Full Name, mailing address and ZIP code Colo. Building, Const. Trades Council Labor Registration Comm.		12-21-77	1000.00
Principal place of business 9 E. Costilla Colo. Springs, CO 81003		Occupation None <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$ 1000	
Full Name, mailing address and ZIP code Lawrence Allen 326 Thatcher Bldg., Pueblo, Co. 81003		12-23-77	100.00
Principal place of business s.e.s above		Occupation Attorney <input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$ 100	
Full Name, mailing address and ZIP code David Donley Rt. 3, Box 37 Pueblo, CO 81004		12-19-77	100.00
Principal place of business Same as above		Occupation Dairy Owner <input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$ 100	
Full Name, mailing address and ZIP code James James Denver, Colorado		12-28-77	100.00
Principal place of business Denver, Colorado		Occupation Consultant <input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$ 100	
Full Name, mailing address and ZIP code Charles Brady 1401 Elizabeth Pueblo, Co. 81003		12-12-77	200.00
Principal place of business same as above		Occupation Dentist <input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$ 200	
Full Name, mailing address and ZIP code Stanley G. & Dorothy Childers 327 Grace, Pueblo, CO 81004		11-30-77	100.00
Principal place of business same as above		Occupation Dentist Doctor <input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$ 100.00	
Subtotal of receipts this page (optional) .....			\$ 1600.00
Total this period (last page this line number only) .....			\$

FORM 4470  
 January, 1973  
 Federal Election Commission  
 1225 K Street, N.W.  
 Washington, D.C. 20543

**FINANCIAL REPORT**  
 (Contributions, Transfers, Contributions in-Kind,  
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 16a, 17a, and/or 18a  
 of FEC FORM 3

Page 2 of 4

Line Number 25

Use Separate Schedules for  
 each numbered line

Name of Candidate or Committee in Full			
<b>Ray Rogosvek for Congress</b>			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt in a Period
Rosa Lee Samuels 168 S. Vance Ct. Denver, Colorado 80225	Western National Bank Federal at Alameda Denver, Colorado 80219 Executive Assistant	4/14/78	100.00
Reason for	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Appropriate Year-To-Date \$ 100.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt in a Period
Sheetmetal Workers International Association Political Action League 1750 New York Avenue, N.W. Washington, D.C. 20006	1750 New York Ave. NW Washington, D.C.	4/19/78	500.00
Reason for	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Appropriate Year-To-Date \$ 500.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt in a Period
Drive Political Fund 25 Louisiana Avenue, N.W. Washington, D.C. 20001	25 Louisiana Ave., N.W. Washington, D.C. 20001	4/27/78	500.00
Reason for	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Appropriate Year-To-Date \$ 500.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt in a Period
D. Bonicelli 809 South Main Walsenburg, Colorado 81089	809 S. Main Walsenburg, Colorado 81089	4/28/78	20.00
Reason for	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Appropriate Year-To-Date \$ 160.00	5/28/78	20.00
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt in a Period
Automobile & Truck Dealers Election Action Committee 8400 Eastpark Drive McLean, Virginia 22101	8400 Westpark Drive McLean, Virginia 22101	5/15/78	2,500.00
Reason for	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Appropriate Year-To-Date \$ 2,500.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt in a Period
Carpenter's Legislative Improve- ment Committee 101 Constitution Ave., N.W. Washington, D.C. 20001	101 Constitution Ave. NW Washington, D.C. 20001	5/1/78	500.00
Reason for	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Appropriate Year-To-Date \$ 500.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt in a Period
Colorado Building & Construction Trades Council-Labor Registration Committee 9 East Cortilla Colorado Springs, CO 80903	9 East Cortilla Colorado Springs, CO 80903	6/8/78	3,000.00
Reason for	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Appropriate Year-To-Date \$ 4,000.00		
SUBTOTAL of receipts this page (optional)			5,140.00
TOTAL this period (last page this line number only)			\$

250111036

lines to  
 total

of each Receipt  
 in Period  
 30.00

of each Receipt  
 in Period  
 500.00

of each Receipt  
 in Period  
 125.00

of each Receipt  
 in Period  
 225.00

of each Receipt  
 in Period  
 225.00

of each Receipt  
 in Period  
 225.00

of each Receipt  
 in Period  
 283.45  
 In-kind  
 plane and  
 pilot

013.45

Page 3





FEDERAL ELECTION COMMISSION

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

April 9, 1979

Treasurer  
Colorado Building and Construction Trades  
Council Labor Registration Committee  
Nine East Costilla Street  
Colorado Springs, CO 80903

Dear Sir or Madam:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by Committee for Tim Wirth, Inc. and Ray Kogosvck for Congress indicates that your organization may have made contributions which total in excess of \$1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

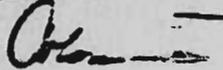
If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed \$1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

91040300575

Please notify the Commission within \_\_\_\_\_  
date on this letter of your decision or \_\_\_\_\_  
questions, please contact Kurt Burkhar, \_\_\_\_\_  
at (800)424-9530. Our local number is (214) \_\_\_\_\_

Sincerely,



Origin: \_\_\_\_\_  
State: \_\_\_\_\_

Certified Mail  
Return Receipts Requested

Enclosures

81040300576

8.1  
OFFICE OF THE ATTORNEY GENERAL  
STATE OF COLORADO  
DENVER, COLORADO 80202  
TELEPHONE (303) 861-7070

RAPID NOTE  
FROM Robert Snow

DATE May 14, 1979

TO FILE/COMPLIANCE TRACKING

2 SVI-78-109

Colorado Building  
Construction Trades Council

MR. DONALD McDONALD (303) 861-7070, ATTORNEY

- called and requested guidance in registration,  
reporting, refunding excessive contributions and  
committee termination. He was advised of the  
mechanics and procedures in all areas.

FORMS/Committee Packet sent Robert Snow

5/14/79

TOPS NO. 5702  
LITHO U.S.A.

**ITEMIZED EXPENDITURES**  
 (Operating, Transfers Out, Contributions In-Kind,  
 Loans, Loan Repayments and Refunds Made)  
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c  
 of FEC FORM 3

(Use Separate Schedules for  
 each numbered line)

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Name of Candidate or Committee on Full			
<b>Ray Kogovsek for Congress</b>			
Full Name, Mailing Address and ZIP Code Colorado Bldg. & Construction Trades Council Labor Registration Comm. 9 E. Costilla, Colorado Springs, Colorado 80903	Particulars of Expenditure Refund-questionable contribution	Date (month, day, year) 5/14/79	Amount of each expend- ture this period 3000
Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Midtown National Bank Midtown Shopping Center Pueblo, CO 81003	Particulars of Expenditure note repayments	Date (month, day, year) 5/04/79 6/11/79	Amount of each expend- ture this period 3500 1098
Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Midtown National Bank Midtown Shopping Center Pueblo, CO 81003	Particulars of Expenditure Note Payments	Date (month, day, year) 6/19/79 6/21/79	Amount of each expend- ture this period 1000 1606
Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expend- ture this period
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expend- ture this period
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expend- ture this period
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expend- ture this period
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
SUBTOTAL of expenditures this page (optional)			\$ 10,204
TOTAL (this period (last page this line number only))			\$ 10,204

REPORTS ANALYSIS REFERRAL SHEET

DATE January 21, 1980 ANALYST Beverly White BW  
TO: Office of General Counsel TEAM CHIEF Suzanne Wilson SW  
THROUGH: STAFF DIRECTOR JSP. COMPLIANCE REVIEW Carroll Bowen CB/AS  
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

CANDIDATE/COMMITTEE: Ray Kogovsek for Congress  
TREASURER: Thomas E. Jagger  
ADDRESS: 127 First National Bank  
Pueblo, CO 81003  
AFFILIATE(S): n/a

1146

ALLEGATION(S): Accepted excessive contribution from unregistered committee CITE: 2 U.S.C. 441(a) ATTACHMENT(S) 2

DATE INITIATED:

MANNER IN WHICH REVIEW WAS INITIATED:

- Normal Review
- Other:
- Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 4/1/78 TO 6/30/78

TOTAL RECEIPTS \$ 15,981 TOTAL EXPENDITURES \$ 14,952

CASH ON HAND \$ 11,456 DEBTS \$ 1,500

HISTORY:

RESULTS OF REVIEW:

- A Surface Violation letter was mailed to the committee on 4/9/79. 3
- A response was received on <sup>5/29</sup> 5/29/79, indicating a refund had been made; 5
- however, an RTB notification was sent in error on 6/8/79. 6
- The committee's July 10 report (received 9/14/79) itemized the refund. 7

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

Penny Harms spoke with the treasurer on April 30, 1979. ATTACHMENT 4

REASON(S) FOR REFERRAL:

The contribution, although refunded, exceeds the Commission threshold for review by OGC. ATTACHMENT

OTHER PENDING ACTIONS INITIATED BY RAD:

NONE ATTACHMENT

OTHER RELEVANT INFORMATION:

not pertinent ATTACHMENT

SEE REFERRAL FOR COLORADO BUILDING AND CONSTRUCTION TRADES COUNCIL

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

Attachment 2  
Part B



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 3, 1979

Treasurer  
Colorado Building and Construction  
Trades Council Labor Registration Committee  
Nine East Costilla Street  
Colorado Springs, CO 80903

Dear Treasurer:

On April 9, 1979, you were notified that you may have made contributions to a political committee which raised problems under 2 U.S.C. 433 and 434.

We received a response from you on May 21, 1979, however, we found your response to be inadequate. Your failure to provide an adequate response gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 433. ✓

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact Beverly Brown, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202) 357-0026. ✓

Sincerely,

*Joan D. Arkin*  
Commissioner

Certified Mail:  
Return Receipt Requested

81040300580

TELECON:

COMMITTEE: COLORADO BUILDING AND CONSTRUCTION TRADES COUNCIL LABOR REGISTRATION COMMITTEE

COMMITTEE CONTACT: MR. JIM FATTOR, ATTORNEY

ANALYST: BEVERLY BROWN

DATE: 8/16/79

CONCERNING: RTB NOTICE : SURFACE VIOLATION 78-109  
Failure to Register

-----  
Mr. Fattor called in response to letter received from the treasurer of the above committee. The letter simply stated that the Commission was in need of additional information and that Mr. Fattor should respond. The treasurer then left town on vacation without identifying the information required by the Commission.

I informed Mr. Fattor that the Colorado Building and Construction Trades Council Labor Registration Committee received a letter from the Commission on 4/9/79. This letter served to inform the committee of the requirements to register as the committee had qualified as a political committee under the ACT.

On 5/14/79 the committee responded after speaking with reports analyst, Rob Snow. The committee indicated that a Statement of Organization would be forthcoming.

On 8/3/79 the commission still had not received the committee's statement of organization and, therefore, a second notice was sent.

I informed Mr. Fattor of the committee's options:

- 1) the committee may register and request a refund of \$3000 (excessive contribution) from Ray Kogosvek.
- 2) the committee may request a refund of \$4000 from Ray Kogosvek and \$120 from Tim Worth.

Mr. Fattor was further informed of the disclosure requirements surrounding registration and reporting of prior activity.

81040300581

# Statement of Organization For a Political Committee

Supporting any candidate for federal office and anticipating contributions or expenditures in excess of \$1,000 in any calendar year in support of such candidate(s).  
(See Reverse Side For Instructions.)

RECEIVED  
FEDERAL ELECTION  
COMMISSION

72 OCT 25 AM 9:59

**Note:** Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

<b>1(a) Name of Committee (in full)</b> <input type="checkbox"/> Check if name or address is changed <b>COLORADO BUILDING &amp; CONSTRUCTION TRADES COUNCIL LABOR REGISTRATION COMMITTEE</b>	<b>2 Identification Number</b> 
<b>(b) Address (number and street)</b> <b>9 East Costilla Street</b>	<b>3 Date</b> <b>October 17, 1979</b>
<b>(c) City, State and ZIP code</b> <b>Colorado Springs, Colorado 80903</b>	<b>4 Is this an amended statement</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <b>IF "YES" FILL IN ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE</b>

**5 Check one:**

(a) This committee has been designated as the principal campaign committee for \_\_\_\_\_ (Name of Candidate) a candidate for \_\_\_\_\_ in the \_\_\_\_\_ Election (Federal office sought) (Year of election) to be held in the State of \_\_\_\_\_ (State in which election is held)

(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

(b) This committee is supporting only one candidate, and is authorized by \_\_\_\_\_ (Name of Candidate) to receive contributions and make expenditures with respect to the \_\_\_\_\_ Election (General, Primary, Runoff, etc) held in \_\_\_\_\_, and will file all reports and statements with the candidate's principal campaign committee, \_\_\_\_\_ (Year of election in State) (Full name of principal campaign committee)

(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (FEC FORM 2a)

(c) This committee supports only one candidate \_\_\_\_\_ (Name of Candidate) but is not an authorized committee.

(d) This committee supports more than one Federal candidate and is not a party committee.

(e) This committee is a \_\_\_\_\_ committee of the \_\_\_\_\_ Party. (National, State, county, city) (Democratic, Republican, etc.)

6 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship
N/A		

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

Corporation   
  Labor organization   
  Membership organization   
  Trade association   
  Cooperative  
 Corporation without capital stock   
  Other (please specify)

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

8104031403345

INTERNATIONAL UNION OF BROTHERHOODS OF AMERICANS TRADES COUNCIL LABOR REGISTRATION COMMITTEE

- .....  Yes  No
- .....  Yes  No
- .....  Yes  No
- .....  Yes  No

List by name, address, office sought, and party affiliation, any candidate for Federal office that this committee is supporting:

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party

List by name, address, office sought, and party affiliation, any candidate(s) for any other public office(s) that this committee is supporting (unless the committee is supporting the entire ticket of a party as indicated in line 9)

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party

If this committee is supporting the entire ticket of a party, give name of party ► DEMOCRAT

10 Identify by name, address and position, the person in possession of committee books and records:

Full name	Mailing address and ZIP code	Title or position
Anton Zafereo	9 East Costilla Street Colorado Springs, CO 80903	

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

81031A9032

Statement of Organization for a Committee

(Page 3)

**COLORADO BUILDING AND CONSTRUCTION TRADES COUNCIL LABOR REGISTRATION COMMITTEE**

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee):

Full name	Mailing address and ZIP code	Title or position
John J. Donlon	1540 Emerson Street Denver, Colorado 80218	
Anton Zafereo	9 East Costilla Street Colorado Springs, CO 80903	

12 Does this committee plan to stay in existence beyond the current calendar year?  Yes  No  
 If "Yes" for how long? ▶

13 In the event of dissolution, what disposition will be made of residual funds? N/A

14 List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

Name of bank, repository, etc.	Mailing address and ZIP code
Central Bank of Colorado Springs	2308 East Pikes Peak Colorado Springs, Colorado

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 43B(a)):

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code
Campaign Report	Sept. 1	Secretary of State	State Services Building
Campaign Report	Oct. 12	"	1525 Sherman Street
Campaign Report	Oct. 27	"	Denver, Colorado 80203
Campaign Report	Dec. 7	"	
Campaign Report	Jan 15	"	

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

*John J. Donlon*  
 (Signature of Treasurer)

12/19/74  
 (Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g or §441j (see instructions)

For further information contact:  Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

Page 13

**DEBTS AND OBLIGATIONS**

Supporting Line Numbers 12 and 13  
 of FEC FORM 3

Page 1 of 1 for  
 Line Number 13

(Use Separate Schedules for  
 each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full				
<b>Ray Kogovsek for Congress Committee</b>				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
The Pueblo Bank & Trust Co. 301 W. 5th Street Pueblo, Colorado 81003	5/10/79			
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		\$ 3,000	\$ None	\$ 3,000
NATURE OF OBLIGATION (Details of Debt)				
Unsecured 90 day note, 11.5% interest, made by Ray Kogovsek for Congress Committee, guaranteed \$1,000 by each person listed in Attachment A				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
Midtown National Bank Midtown Shopping Center Pueblo, Colorado 81003	8/3/78			
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		\$ 7,000	\$ 7,000	\$ none
NATURE OF OBLIGATION (Details of Debt)				
Commercial loan made by candidate for personal and family living expenses - previously listed				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		\$	\$	\$
NATURE OF OBLIGATION (Details of Debt)				
SUBTOTALS this period this page (optional) . . . . .				
		\$	\$	\$
TOTAL this period (last page this line number only) . . . . .				
		\$ 3,000	\$ 7,000	\$ 3,000
Carry outstanding balance only to appropriate line of summary				

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CERTIFIED MAIL

REPORT OF RECEIPTS AND EXPENDITURES

SEP 14 1979

FOR A CANDIDATE OR COMMITTEE SUPPORTING CANDIDATE(S) FOR NOMINATION OR ELECTION TO FEDERAL OFFICE

FEC FORM 3 REVISED January, 1978 Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463

(Except for Candidates or Committees Receiving Federal Matching Funds)

RECEIVED

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with a campaign must maintain separate records with respect to each election.

1979 SEP 18 4 11:52

1 Ray Kogovsek for Congress  
Name of Candidate or Committee (in full)  
127 First National Bank Building  
Address (number and street)  
Pueblo, Colorado 81003  
City, State and ZIP Code

2 I.D. No. CO-A72010  
Candidate/Committee  
3rd Congressional - Colorado  
Office Sought, State/District (if applicable)  
Year of Election 1978

4 Type of Report (check appropriate boxes)  
 April 10 Quarterly Report  
 July 10 Quarterly Report  
 October 10 Quarterly Report  
 January 31 Annual Report  
 Monthly Report  
 Tenth day report preceding  
 Termination Report  
 Amendment for:  
This is a report for  Primary Election  General Election  Primary and General  Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES (Figures may be rounded to nearest dollar.)

6 Covering Period	Column A This Period	Column B Calendar Year-To-Date
4/1/79 Through 6/30/79		
6 Cash on hand January 1, 19		\$ 261
7 Cash on hand at beginning of reporting period	\$ 273	
8 Total receipts (from line 19)	\$13,155	\$ 22,615
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$13,428	\$ 22,876
9 Total expenditures (from line 25)	\$12,806	\$ 22,254
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 622	\$ 622
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$ None	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ 3,000	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.  
10/9/79 (Date) Thomas E. Jagger (Typed Name of Treasurer or Candidate) Thomas E. Jagger (Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441 (see reverse side of form).

For further information, contact: Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463 or call 800/424-9530 Approved by GAO B-187620 (R05-06) Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Page 15

FEDERAL CAMPAIGN COMMISSION  
 1775 K Street, N.W.  
 Washington, D.C. 20003

**FINANCED RECEIPTS**  
 (Contributions, Transfers, Contributions to (Fund, Other Income, Loans, Refunds)  
 Supporting Lines 14a, 15a, 16a, 17a, 18a, and/or 19a of FEC FORM 3

Page 2 of 4 for  
 Line Number 100  
 Also Separate Schedule for each numbered line

Name of Contributor or Committee to Fund		Principal Place of Business	Date (month, day, year)	Amount of each receipt (the Period)
Ray Rogosvok for Congress				
Full Name, Mailing Address and ZIP Code Rosa Lee Samuels 168 S. Vance Ct. Denver, Colorado 80225		Western National Bank Federal at Alameda Denver, Colorado 80219 Executive Assistant	4/14/78	100.00
Reason for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Sheetmetal Workers International Association Political Action League 1750 New York Avenue, N.W. Washington, D.C. 20006		<input type="checkbox"/> Check if Contributor is self-employed Amount Year-To-Date \$ 100.00 Principal Place of Business 1750 New York Ave. NW Washington, D.C. Occupation N/A	4/19/78	500.00
Reason for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Drive Political Fund 25 Louisiana Avenue, N.W. Washington, D.C. 20001		<input type="checkbox"/> Check if Contributor is self-employed Amount Year-To-Date \$ 500.00 Principal Place of Business 25 Louisiana Ave., N.W. Washington, D.C. 20001 Occupation N/A	4/27/78	500.00
Reason for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code D. Donicelli 809 South Main Walcenburg, Colorado 81089		<input type="checkbox"/> Check if Contributor is self-employed Amount Year-To-Date \$ 500.00 Principal Place of Business 809 S. Main Walcenburg, Colorado 81089 Occupation Merchant	4/20/78 5/20/78	20.00 20.00
Reason for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Automobile & Truck Dealers Election Action Committee 8400 Westpark Drive McLean, Virginia 22101		<input type="checkbox"/> Check if Contributor is self-employed Amount Year-To-Date \$ 100.00 Principal Place of Business 8400 Westpark Drive McLean, Virginia 22101 Occupation N/A	5/15/78	2,500.00
Reason for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Carpenter's Legislative Improvement Committee 101 Constitution Ave., N.W. Washington, D.C. 20001		<input type="checkbox"/> Check if Contributor is self-employed Amount Year-To-Date \$ 2,000.00 Principal Place of Business 101 Constitution Ave, NW Washington, D.C. 20001 Occupation N/A	5/1/78	500.00
Reason for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Colorado Building & Construction Trades Council-Labor Registration Committee 9 East Contilla Colorado Springs, CO 80903		<input type="checkbox"/> Check if Contributor is self-employed Amount Year-To-Date \$ 500.00 Principal Place of Business 9 East Contilla Colorado Springs, CO 80903 Occupation N/A	6/8/78	3,000.00
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Amount Year-To-Date \$ 4,000.00				
TOTAL of receipts (the line number only)				7,140.00
TOTAL the period (during the line number only)				8

78011414056

Ref each receipt in Period  
 30.00  
 7  
 Ref each receipt in Period  
 100.00  
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 Ref each receipt in Period  
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Kogosvek 579



FEDERAL ELECTION COMMISSION

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

9 April 1979

Thomas E. Jagger, Treasurer  
Ray Kogosvek for Congress  
127 First National Bank Building  
Pueblo, Colorado 81003

Dear Mr. Jagger:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the July 10 Quarterly Report of Receipts and Expenditures, we noticed an entry indicating that you may have received a contribution which exceeds the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

The Act precludes individuals and political committees, other than multicandidate committees, from making political contributions to a candidate for Federal election in excess of \$1,000 per election. The Act defines a multicandidate committee as one which has been registered for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office. The committee listed as the source of the contribution in question does not presently qualify as a multicandidate committee and we have notified them accordingly. We have recommended that the source committee notify you if it is confirmed that the contribution was in excess of the limits.

The Commission recommends that if you find the contribution you received was in excess of the limits set forth in the Act you return the amount in excess of \$1,000 to the donor. This return should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

81040600588

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Penny Harms (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4172.

Sincerely,

*Orlando B. Potter*

Orlando B. Potter  
Staff Director

Certified Mail  
Return Receipt Requested

81040300589

66 KCCSVEK 45V. 176-165 PH

818 Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).  
 Show to whom and date delivered..... c  
 Show to whom, date, and address of delivery..... c  
 RESTRICTED DELIVERY  
 Show to whom and date delivered:..... c  
 RESTRICTED DELIVERY  
 Show to whom, date, and address of delivery. \$.....  
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
 943252  
 (Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE  Addressee  Authorized agent

4. DATE OF DELIVERY: *April 13, 1979*

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

JAGEER

POSTMARK  
 APR 13 1979  
 CLERK'S OFFICE

★GPO. 1977-0-249-595

MEMORANDUM: FOR FILES

RE: TELECON

FROM: Tom Jagger, Treasurer. to Penny Harms

DATE: April 30, 1979

NAME OF COMMITTEE: RAY KOGOVSEK FOR CONGRESS; CO/3

(303) 545-4412

possible.  
 Mr. Jagger called about a surface violation letter they received on a/ excessive contribution from the Colo. Bldg. & Construction Trades Council. As far as we know, they are unregistered. Mr. Jagger said he has been trying to get in touch with the person on their committee who knew when the \$ came in and all the details, and that that person is now checking into the matter. He said it will probably take a couple more days, but he wanted to let us know they were looking into it. The SV letter was dated April 9. Mr. Jagger will be back in touch with us just as soon as they are able to find out anything.

81040300590

MAY 25 1979  
REGULAR MAIL

LAW OFFICES OF  
THOMAS E. JAYNER  
SUITE 127  
FIRST NATIONAL BANK BUILDING  
FUELLER, COLORADO 81003

RECEIVED  
FEDERAL ELECTION  
COMMISSION

'79 MAY 29 PM 2:50

THOMAS E. JAYNER  
DAVID A. COLE  
JOHN G. BOGREN  
PAUL J. WILLIAMS

TELEPHONE  
303  
RECEIVED  
MAY 30 AM 11:27  
U.S. HOUSE OF REPRESENTATIVES

May 25, 1979

Ms. Penny Harns  
Reports Analyst  
Federal Election Commission  
1325 K. Street N.W.  
Washington, D.C. 20463

Re: Ray Kogovsek for Congress  
Committee  
No. CO 072010

Dear Ms. Harns:

After reviewing your letter of April 9, 1979 relating to receipt of contributions in excess of limits, we thoroughly reviewed the matter and are of the opinion that your interpretation is correct. The Committee has this date refunded \$3,000 in excess contributions to: Colorado Building & Construction Trades Council-Labor Registration Committee, 9 East Costilla, Colorado Springs, Colorado which was not a duly registered multicandidate committee.

Thank you very kindly for your cooperation in this matter.

Very truly yours,  
RAY KOGOVSEK FOR CONGRESS COMMITTEE

*Thomas E. Jayner*  
Thomas E. Jayner  
Treasurer

TEJ:sm

7 8 1 0 4 0 3 0 0 5 9 1  
7 9 0 1 1 5 3 2 7 5

Page 21



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 8, 1979

7/8

Thomas E. Jagger, Treasurer  
Ray Kogosvek for Congress  
127 First National Bank  
Building  
Pueblo, CO 81003

Dear Mr. Jagger:

On April 9, 1979, you were notified that certain entries in the July 10 Quarterly Report of Receipts and Expenditures filed by your committee raised problems under 2 U.S.C. 441a.

As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 441a.

The Commission intends to take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact ~~Penny Harms~~, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202)523-4172.

*Beverly White*

Sincerely,

*Max A. Friedland*  
Commissioner

Certified Mail:  
Return Receipt Requested

Page 22

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**ITEMIZED EXPENDITURES**  
 (Operating, Transfers Out, Contributions In-Kind,  
 Loans, Loan Repayments and Refunds Made)  
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c  
 of FEC FORM 3

221

222

223  
 6/19/79  
 6/21/79  
 8/17/79

Name of Candidate or Committee in Full			
<b>Ray Kogovsek for Congress</b>			
Full Name, Mailing Address and ZIP Code Colorado Bldg. & Construction Trades Council Labor Registration Comm. 9 E. Costilla, Colorado Springs, Colorado 80903	Particulars of Expenditure Refund-questionable contribution	Date (month, day, year) 5/14/79	Amount of each expend- ture this period 3000
Full Name, Mailing Address and ZIP Code Midtown National Bank Midtown Shopping Center Pueblo, CO 81003	Particulars of Expenditure note repayments	Date (month, day, year) 5/04/79 6/11/79	Amount of each expend- ture this period 3500 1098
Full Name, Mailing Address and ZIP Code Midtown National Bank Midtown Shopping Center Pueblo, CO 81003	Particulars of Expenditure Note Payments	Date (month, day, year) 6/19/79 6/21/79	Amount of each expend- ture this period 1000 1606
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expend- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expend- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expend- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expend- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expend- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expend- ture this period
SUBTOTAL of expenditures this page (optional)			\$ 10,204
TOTAL this period (last page this line number only)			\$ 10,204

Page 23

REPORTS ANALYSIS REFERRAL UPDATE

\*ORIGIN: RAD

Weeder

DATE April 10, 1980

ANALYST Kevin Kelly KK

TO: Office of General Counsel  
ATTENTION: Gary Johansen

TEAM CHIEF Steve Mims M

THROUGH: STAFF DIRECTOR [Signature]

COMPLIANCE REVIEW

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

MUR No. 1150

DATE OF ORIGINAL REFERRAL 1/21/80

\*\*PURPOSE: INFORMATION

8  
1  
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4

The Colorado Building and Construction Trades Council Labor Registration Committee filed a termination report covering from their date of registration to December 31, 1979. This report discloses the contribution refund from the Kogosevek for Congress Committee. (See Attachment 1)

ON April 2, 1980 the Colorado committee contacted the Reports Analysis Division in regard to the necessity of filing a quarterly report for 1980. During the conversation the Treasurer, Mr. Anton Zafereo, was informed that the committee is still required to file reports of receipts and expenditures covering the period when they were contributing to federal candidates. (See Telecon, Attachment 2)

OUTCOME: (if applicable)

\*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).  
\*\*INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

Attachment 3

FEC FORM 3  
 REVISED  
 January, 1978  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

**REPORT OF RECEIPTS AND EXPENDITURES  
 FOR A CANDIDATE OR COMMITTEE  
 SUPPORTING CANDIDATE(S) FOR  
 NOMINATION OR ELECTION TO FEDERAL OFFICE**

(Except for Candidates or Committees Receiving Federal Matching Funds)

RECEIVED  
 COLLECTION

Note: Committee authorized by a candidate to receive contributions and make expenditures in connection with a campaign must submit separate reports with respect to each election.

Colorado Building & Construction Trades Council, Labor Registration Committee

1 Name of Candidate or Committee (in full)

2 I.D. No. C00114843

3 Location 1, Build 1, 2860 S. Circle Drive  
 Address (number and street)  
 Colorado Springs, Colorado 80906  
 City, State and ZIP Code

4 Type of Report (check appropriate boxes)

April 10 Quarterly Report  
 July 10 Quarterly Report  
 October 10 Quarterly Report  
 January 31 Annual Report  
 Monthly Report

Tenth day report preceding election (primary, general or convention) on \_\_\_\_\_ in the State of \_\_\_\_\_

Termination Report

Amendment for: \_\_\_\_\_ (which report)

Thirtieth day report following election (primary, general or convention) on \_\_\_\_\_ in the State of \_\_\_\_\_

Primary Election  General Election  Primary and General  Other (special, runoff, etc.)

**SUMMARY OF RECEIPTS AND EXPENDITURES**  
 (Figures may be rounded to nearest dollar.)

5 Covering Period	Column A This Period	Column B Calendar Year-To-Date
Oct 17, 1979 Through Dec 31, 1979		
6 Cash on hand January 1, 1979		\$ none
7 Cash on hand at beginning of reporting period	\$ none	
8 Total receipts (from line 18) (a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 3,000.00 \$ 3,000.00	\$ 3,000.00 \$ 3,000.00
9 Total expenditures (from line 25)	\$ 3,000.00	\$ 3,000.00
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ none	\$ none
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$	
12 Debts and obligations owed to the Committee/Candidate (itemize on Schedule C)	\$ none	
13 Debts and obligations owed by the Committee/Candidate (itemize on Schedule C)	\$ none	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Jan 22, 1980 (Date)

JOHN J. DONLON (Typed Name of Treasurer)

[Signature] (Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441; (see reverse side of form)

For further information, contact: Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463 or call 800/424-9530

Approved by GAO 8-187820 (R0508) Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

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**DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES**

Colorado Building & Const Trades **Page 2, FEC FORM 2**

NAME OF CANDIDATE OR COMMITTEE Council Labor Registration Committee	REPORT COVERING THE PERIOD FROM Oct 17, 1979 TO Dec 31, 1979	
RECEIPTS	Column A This Period	Column B Calendar Year-To-Date
14. Contributions from individuals (including contributions in-kind):		
(a) Itemized (use Schedule A) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Sales and exchanges included above:		
List by name on memo Schedule D IS _____ )		
(d) Subtotal of contributions from individuals .....	\$ .....	\$ .....
15. Transfers from Political Committees:		
(a) Funds from affiliated/authorized committees (Itemize on Schedule A regardless of amount) .....	\$ .....	
(b) Funds from other committees (Itemize on Schedule A regardless of amount) .....	\$ 3,000.00 .....	
(c) Contributions in-kind from political committees (Itemize on Schedule A regardless of amount) .....	\$ .....	
(d) Subtotal of transfers in and contributions in-kind from political committees .....	\$ .....	\$ 3,000.00
16. Other Income:		
(a) Itemized (use Schedule A) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Subtotal of other income .....	\$ .....	\$ .....
17. Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Subtotal of loans and loan repayments received .....	\$ .....	\$ .....
18. Refunds, Rebates, Returns of Deposits:		
(a) Itemized (use Schedule A) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Subtotal of refunds, rebates, returns of deposits .....	\$ .....	\$ .....
19. Total Receipts .....	\$ 3,000.00	\$ 3,000.00
<b>EXPENDITURES</b>		
20. Operating Expenditures:		
(a) Itemized (use Schedule B) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Subtotal of operating expenditures .....	\$ .....	\$ .....
21. Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Subtotal of loans and loan repayments made and contribution refunds .....	\$ .....	\$ .....
22. Transfers Out to Political Committees:		
(a) To affiliated/authorized committees (Itemize on Schedule B regardless of amount) .....	\$ 3,000.00 .....	
(b) To other committees (Itemize on Schedule B regardless of amount) .....	\$ .....	
(c) Contributions in-kind to other committees (Itemize on Schedule B regardless of amount) .....	\$ .....	
(d) Subtotal of transfers out .....	\$ 3,000.00	\$ 3,000.00
23. Independent Expenditures (use Schedule E) .....	\$ .....	\$ .....
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441(d)) (Itemize on Schedule F) .....	\$ .....	\$ .....
25. Total Expenditures .....	\$ 3,000.00	\$ 3,000.00
<b>NET OF RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES</b>		
26. Total Receipts (from line 19) .....	\$ 3,000.00	
27. Transfers In (from line 15(a)) .....	\$ .....	
28. Net Receipts (Subtract line 27 from line 26) .....	\$ 3,000.00	
29. Total Expenditures (from line 25) .....	\$ 3,000.00	
30. Transfers Out (from line 22(a)) .....	\$ .....	
31. Net Expenditures (Subtract line 30 from line 29) .....	\$ 3,000.00	

77515

**SCHEDULE A**  
**REVISED**  
 January, 1979  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20543

**ITEMIZED RECEIPTS**

(Contributions, Transfers, Contribution In-Kind,  
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
 of FEC FORM 3

Page 1 of 1 for  
 Line Number 15

(Use Separate Schedules for  
 each numbered line)

Name of Candidate or Committee in Full			
Colorado Building & Const Trades Council Labor Registration Committee			
Full Name, Mailing Address and ZIP Code Congressman Ray Kogovsek United Bank Bldg Pueblo, Colorado	Principal Place of Business Washington, D. C. Occupation 3rd Dist Congressman	Date (month, day, year) May 24, 1979	Amount of each Receipt this Period \$3,000.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$3,000.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
<b>SUBTOTAL</b> of receipts this page (optional)			\$ 3,000.00
<b>TOTAL</b> this period (last page this line number only)			\$ 3,000.00

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**SCHEDULE B**  
**REVISED**  
 January, 1978  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20003

**ITEMIZED EXPENDITURES**  
 (Operating, Transfer, Out, Contributions In-Kind,  
 Loans, Less Refundations and Refunds Made)  
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c  
 of FEC FORM 3

Page 1 of 1 for  
 Line Number 266  
 (Use Separate Schedules for  
 each numbered line)

Name of Candidate or Committee in Full

**Colorado Building & Const Trades Council Labor Registration Committee**

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Political Education Fund Build & Const Trades Dept 815 16th St N W Room 603 Washington, D C 20006	Return of funds to the Build Trades Dept  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	May 25, 1979	\$3,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this page (optional)			\$ 3,000.00
TOTAL this period (last page this line number only)			\$ 3,000.00

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Colo Bldg & Const Trades Council  
Labor Registration Committee  
Location 1, Building 1  
2860 South Circle Drive  
Colorado Springs, Colo 80906

*Special Delivery*

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RECEIVED  
No. 862938

Federal Election Commission  
1325 K Street N. W.  
Washington, D. C. 20463

*St. Louis*

TELECON FOR FILES

FROM: Kevin Kelly

TO: Tony Zafereo

Phone: (303) 576-6770

DATE: 4/2/80

CITE: COLORADO BLDG & CONSTRUCTION TRADES LABOR REGISTRATION COMMITTEE

I returned Mr. Zafereo's calls of earlier today. He was calling because the committee had received prior notice to file the first quarter report. Mr. Zafereo stated that they had filed a termination report in January and he didn't think that they were required to file anything else. I explained that we had made an error in coding his report, listing it as a Year End report instead of a termination. I said that; until they decide to become active in federal elections again, they need not submit any future reports. However, they were still required to file the reports for 1977-1978. I explained that we had required them to register because of the contributions that they had made to Ray Kogosvek and Tim Wirth. They must file reports of receipts and expenditures covering the period when they were contributing to candidates. Mr. Zafereo said that he had filed all of this information with the secretary of State and would send it to the FEC, on the FEC forms.

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→ 77-78

→ Arnold Mc Arnold



FILL OUT SCHEDULES 1 THROUGH 14 BEFORE FILLING OUT STATEMENTS A THROUGH C

ENTER AMOUNTS IN DOLLARS ONLY  
STATEMENT A—ASSETS AND LIABILITIES

Item	ASSETS	FROM SCH #	Start of Reporting Period (A)		End of Reporting Period (B)		Item	LIABILITIES	FROM SCH #	Start of Reporting Period (C)		End of Reporting Period (D)	
				cts		cts					cts		cts
23.	(a) Cash on hand (Statement C, lines 1)		\$ 50	XX	\$ 100	XX	32.	Accounts Payable		\$ -0-	XX	\$ 161	X
	(b) Cash in banks (Statement C, lines 2)		20,932	XX	23,212	XX	33.	Loans Payable	8		XX		X
24.	Accounts Receivable			XX		XX	34.	Mortgages Payable			XX		X
25.	Loans Receivable	1		XX		XX	35.	Other Liabilities	4		XX		X
26.	U.S. Treasury Securities			XX		XX	36.	TOTAL LIABILITIES		\$ -0-	XX	\$ 161	X
27.	Mortgage Investments			XX		XX	NET ASSETS						
28.	Other Investments	2	12,500	XX	12,500	XX	37.	Net Assets (Item 31 less Item 36)		\$ 39,540	XX	\$ 41,417	X
29.	Fixed Assets	5	6,058	XX	5,766	XX							
30.	Other Assets	3		XX		XX							
31.	TOTAL ASSETS		\$ 39,540	XX	\$ 41,578	XX							

STATEMENT B—RECEIPTS AND DISBURSEMENTS

Item	CASH RECEIPTS	FROM SCH #	(A)		Item	CASH DISBURSEMENTS	FROM SCH #	(B)	
				cts					cts
38.	Dues			XX	55.	Per Capita Tax		\$	X
39.	Per Capita Tax		246,438	XX	56.	Fees, Fines, Assessments, etc.			X
40.	Fees			XX	57.	To Affiliates of Funds Collected on Their Behalf			X
41.	Fines			XX	58.	For Account of Affiliates		1,583	X
42.	Assessments			XX	59.	To Officers:	9		
43.	Work Permits			XX	(a) Gross		\$ 121,507		
44.	On Behalf of Affiliates for Transmittal to Them		1,583	XX	(b) Less Deductions		31,002		90,505 X
45.	Sale of Supplies		5,114	XX	60.	To Employees:	10		
46.	Interest		842	XX	(a) Gross		\$ 16,141		
47.	Dividends			XX	(b) Less Deductions		3,849		12,292 X
48.	Rents			XX	61.	Office and Administrative Expense		51,571	X
49.	Loans Obtained	8		XX	62.	Educational and Publicity Expense		32,020	X
50.	Sale of Investments and Fixed Assets	7	800	XX	63.	Professional Fees		1,080	X
51.	Repayment of Loans Made	1		XX	64.	Benefits	11	12,600	X
52.	From Members for Disbursement on Their Behalf			XX	65.	Loans Made	1		X
53.	From Other Sources	13	5,938	XX	66.	Contributions, Gifts and Grants	12	3,995	X
54.	TOTAL RECEIPTS (Items 38 through 53)		\$ 260,715	XX	67.	Supplies for Resale		3,048	X
					68.	Purchase of Investments and Fixed Assets	6	7,051	X
					69.	Direct Taxes		34,690	X
					70.	Withholding Taxes		6,758	X
					71.	On Behalf of Individual Members			X
					72.	Repayment of Loans Obtained	8	1,192	X
					73.	For Other Purposes	14		X
					74.	TOTAL DISBURSEMENTS (Items 55 through 73)		\$ 258,385	X

STATEMENT C—CASH

Cash at Start of Reporting Period		(A)	Cash at End of Reporting Period		(B)
1.	Cash on Hand	\$ 50	1.	Cash on Hand	\$ 100
2.	Cash in Banks (Checking Accounts and Other Deposits)	20,932	2.	Cash in Banks (Checking Accounts and Other Deposits)	23,212
3.	Total of Lines 1 and 2	20,982			
4.	Total Receipts from Line 54	260,715			
5.	Total of Lines 3 and 4	281,697			
6.	Total Disbursements from Line 74	258,385			
7.	Deduct Line 6 from Line 5	\$ 23,312	3.	Total of Lines 1 and 2	\$ 23,312

If the amount entered in line 7, column (A) does not equal the amount entered in line 3, column (B), there is a discrepancy in your reporting. Correct the discrepancy or explain it in Item 22.

If more space is needed to list items in any of the schedules below, continue the list on additional sheets, using the same column headings used on the schedule and enter the totals on the line provided for additional listings on the schedule.

SCHEDULE 1—LOANS RECEIVABLE

List below outstanding loans to officers, employees, or members which at any time during the reporting period exceeded \$250 and list all loans, regardless of amount, made to business enterprises. (A)	Loans Outstanding at Start of the Period (B)	Loans Made During the Period (C)	Repayments Received During the Period		Balance at the End of the Period (E)
			Cash (D)(1)	Other Than Cash (D)(2)	
1. (Name) _____ (Purpose) _____ (Security) _____ (Terms of Repayment) _____	\$	\$	\$	\$	\$
2. (Name) _____ (Purpose) _____ (Security) _____ (Terms of Repayment) _____					
3. Totals from Additional Listings, if any.					
4. Totals of Loans not Listed above.					
5. Totals of Lines 1 through 4.	\$	\$	\$	\$	\$

Enter the Totals from Line 5 in Item 25, Column A. Item 65, Item 51, Item 22 with Explanation, Item 25, Column B.

ENTER AMOUNTS IN DOLLARS ONLY

**SCHEDULE 2—INVESTMENTS OTHER THAN U.S. TREASURY SECURITIES AND MORTGAGE INVESTMENTS**

Description (A)	Amount (B)
<b>Marketable Securities:</b>	
1. Total Cost	\$
2. Total Book Value	
3. Itemize each Marketable Security holding which is valued at over \$1000 and which is also greater than 20% of the amount given in Line 2.	
(a)	
(b)	
(c)	
(d)	
<b>Other Investments:</b>	
4. Total Cost	12,500
5. Total Book Value	12,500
6. Itemize each Other Investment holding which is valued at over \$1000 and which is also greater than 20% of the amount given in Line 5. Also itemize each subsidiary for which separate reports are attached.	
AFL-CIO	12,500
(a)	
(b)	
(c)	
(d) Total from Additional Listings, if any	
7. Total of Lines 2 and 5.	\$ 12,500
Enter the Total from Line 7 in Item 28, Column B	

**SCHEDULE 3—OTHER ASSETS**

Description (A)	Book Value (B)
1.	\$
2.	
3.	
4.	
5. Total from Additional Listings, if any	
6. Total of Lines 1 through 5.	\$
Enter the Total of Line 6 in Item 30, Column B	

**SCHEDULE 4—OTHER LIABILITIES**

Description (A)	Amount at End of Period (B)
1.	\$
2.	
3.	
4.	
5.	
6.	
7.	
8. Total from Additional Listings, if any	
9. Total of Lines 1 through 8.	\$
Enter the Total from Line 9 in Item 35, Column D	

**SCHEDULE 5—FIXED ASSETS**

Description (A)	Cost or Other Basis (B)	Total Depreciation (if any) or Amount Expensed (C)	Book Value (D)	Fair Market Value (E)
1. Land (Give Location):	\$		\$	\$
2. Totals from Additional Listings, if any				
3. Buildings (Give Location):		\$		
4. Totals from Additional Listings, if any				
5. Automotive Equipment	14,162	13,716	446	446
6. Office Furniture and Equipment	14,594	9,274	5,320	5,320
7. Other Fixed Assets	5,815	5,815	-0-	-0-
8. Totals of Lines 1 through 7.	\$ 34,571	\$ 28,805	\$ 5,766	\$ 5,766
Enter the Total from Line 8, column D in		Item 29, Column B		

**SCHEDULE 6—PURCHASE OF INVESTMENTS AND FIXED ASSETS**

Description of Assets (if land or buildings, give location) (A)	Cost (B)	Book Value (C)	Cash Paid (D)
1. Tennesco File Cabinets (2)	\$ 651	\$ 630	\$ 651
2. Dictaphone Transcriber	397	391	397
3. Telephone Message Unit	2,000	1,944	2,000
4.			
5. Totals from Additional Listings, if any			
6. Totals of Lines 1 through 5.	\$ 3,048	\$ 2,965	\$ 3,048
Enter the Total from Line 6, Column D in		Item 68	

Description of Asset Traded In (A)	Cost (B)	Book Value (C)	Trade-In Allowance (D)
(a)	\$	\$	\$
(b)			

**SCHEDULE 7—SALE OF INVESTMENTS AND FIXED ASSETS**

Description of Assets Sold (if land or building, give location) (A)	Cost (B)	Book Value (C)	Gross Sales Price (D)	Amount Received (E)
1. Vehicle	\$ 4,218	\$ -0-	\$ 800	\$ 800
2.				
3.				
4. Total from Additional Listings, if any				
5. Totals of Lines 1 through 4.	\$ 4,218	\$ -0-	\$ 800	\$ 800
Enter the Total from Line 5, Column E in		Item 50		

**SCHEDULE 8—LOANS PAYABLE**

Source of Loans Payable at any Time During the Reporting Period (A)	Terms for Repayment (B)	Balance at Start of Period (C)	Loans Obtained During Period (D)	Repayment of Loans During Period		Balance at End of Period (F)
				Cash (E)(1)	Other Than Cash (E)(2)	
1.		\$	\$	\$	\$	\$
2.						
3.						
4.						
5. Total from Additional Listings, if any						
6. Totals of Lines 1 through 5.		\$	\$	\$	\$	\$

Enter the Totals from Line 6 in Item 33, Column C      Item 49      Item 72      Item 22 with Explanation      Item 33, Column D

ENTER AMOUNTS IN DOLLARS ONLY

**SCHEDULE 9—LIST OF ALL OFFICERS AND DISBURSEMENTS TO OFFICERS**

Name (Important: List all persons who held office during the period) (A)	Title (B)	Status (C)	Gross Salary (before taxes and other deductions) (D)	Allowances (E)	Other Direct and Indirect Disbursements		Total (H)
					Expenses Including Reimbursed Expenses (F)	Other Disbursements (G)	
1.			\$	\$	\$	\$	\$
2.							
3.							
4.							
5.							
6.							
7.							
8.							
9.							
10. Total from Additional Listings, if any.			108,557		12,950		121,507
11. Totals of Lines 1 through 10.			\$ 108,557	\$	\$ 12,950	\$	\$ 121,507

Code for Column C, "Status": past officer—P; continuing officer—C; new officer during this reporting period—N.  
 Enter the Total of Line 11, Column H in ..... Item 59(a)  
 NOTE: If any officer was not elected at a regular election in accordance with the constitution and bylaws, explain in Item 22.

**SCHEDULE 10—DISBURSEMENTS TO EMPLOYEES**

List below all employees who received more than \$10,000 in gross salary, allowances, and other direct and indirect disbursements from this labor organization and any affiliate.

Name (A)	Position (B)	Name of Affiliated Organization (if applicable) (C)	Gross Salary (before taxes and other deductions) (D)	Allowances (E)	Other Direct and Indirect Disbursements		Total (H)
					Expenses Including Reimbursed Expenses (F)	Other Disbursements (G)	
1. Dorothy Wilburn	BKKPR		\$ 15,181	\$	\$	\$	\$ 15,181
2.							
3.							
4.							
5.							
6. Total from Additional Listings, if any							
7. Total for all employees who, during the reporting period, received \$10,000 or less gross salary, allowances, and other direct and indirect disbursements.			960				960
8. Totals of Lines 1 through 7.			\$ 16,141	\$	\$	\$	\$ 16,141

Enter the Total of Line 8, Column H in ..... Item 60(a)

**SCHEDULE 11—BENEFITS**

Type of Benefit (A)	To Whom Paid (B)	Amount (C)
1.		\$
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10. Total from Additional Listings, if any		12,600
11. Total of Lines 1 through 10.		\$ 12,600

Enter the Total from Line 11 in ..... Item 64

**SCHEDULE 12—CONTRIBUTIONS, GIFTS AND GRANTS**

Type (A)	Amount (B)
1.	\$
2.	
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10. Total from Additional Listings, if any	3,995
11. Total of Lines 1 through 10.	\$ 3,995

Enter the Total from Line 11 in ..... Item 66

**SCHEDULE 13—OTHER RECEIPTS**

Other Sources (A)	Amount (B)
1. Raffle Proceeds	\$ 3,060
2.	2,878
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10. Total from Additional Listings, if any	
11. Total of Lines 1 through 10.	\$ 5,938

Enter the Total from Line 11 in ..... Item 53

**SCHEDULE 14—OTHER DISBURSEMENTS**

Other Purposes (A)	Amount (B)
1. Miscellaneous	\$ 267
2.	925
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10. Total from Additional Listings, if any	
11. Total of Lines 1 through 10.	\$ 1,192

Enter the Total from Line 11 in ..... Item 73

Colorado Building & Construction Trades Council  
1540 Emerson Street  
Denver, Colorado 84-0628373

Schedule 12

Water for Colorado	\$ 50
National Jewish Hospital	150
International Guiding Eyes	100
Colorado AFL-CIO Scholarship Fund	100
American Cander Society	25
Boy Scouts	100
Special Olympics	500
Guide for the Blind	25
Histrdrut Council	125
Labor Registration Committee	<u>2,820</u>
	<u>\$ 3,995</u>

81040300605

Colorado Building & Construction Trades Council  
 1540 Emerson Street  
 Denver, Colorado

84-0628373

<u>Schedule 9</u>	<u>Status</u>	<u>Title</u>	<u>Salary</u>	<u>Expenses</u>	<u>Total</u>
John Donlon		Bus. Mgr.	\$ 32,637	\$ 4,511	\$ 37,148
Leroy Gauthier		Pres.			
George Dragosh		V. Pres.			
David Wilson		R. Secy.			
Robert Elliott		Sgt. of Arms			
Bernard Robinson		Trustee		439	439
Russel Simms		Trustee			
Con Fortunato		Trustee			
Bob Braun		Trustee			
Paul Wishard	C	Bus. Rep.	16,064	2,274	18,338
David Jordan	C	Bus. Rep.	23,683	2,031	25,714
Charles Demoulin	N	Bus. Rep.	6,295		6,295
Anton Zafereo	C	Bus. Rep.	25,624	2,335	27,959
Perry McGinnis	C	Safety Admin.	4,254	1,360	5,614
			<u>\$108,557</u>	<u>\$ 12,950</u>	<u>\$121,507</u>

<u>Schedule 11</u>	<u>Paid to</u>	<u>\$</u>
<u>Type of Benefit</u>		
Health & Pension Benefits	Eighth District Electrical Benefit	2,685
Health Benefit	NEBF	807
Pension	Western States Pension	816
Health & Pension	Colorado Laborers Trust	1,101
Pension & Health	Colorado Brickmasons	3,162
Pension & Health	Oper. Engineers H/W #2	2,899
Health	Carpet & Linoleum Benefit	464
Health & Pension	Colo. Corp. & Millwright Ford	666
		<u>\$ 12,600</u>

81040300606

'80 JUN 4 AM 11:35

DEPARTMENT OF LABOR  
LABOR-MANAGEMENT SERVICES ADMINISTRATION  
OFFICE OF LABOR-MANAGEMENT STANDARDS ENFORCEMENT  
WASHINGTON, D. C. 20216

81040300607

POSTAGE AND FEES PAID  
U. S. DEPARTMENT OF LABOR  
LAB 441

OFFICIAL BUSINESS  
PENALTY FOR PRIVATE USE, \$300

**FIRST CLASS**

Ms. Carolyn Weeder  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

EVOLUTION BY

REPORTS ANALYSIS REFERRAL UPDATE

\*ORIGIN: RAD

DATE May 6, 1980

ANALYST Kevin Kelly KR

TO: Office of General Counsel  
ATTENTION: Carolyn Weeder

TEAM CHIEF Steve Mims

THROUGH: STAFF DIRECTOR <sup>AL for</sup>                     

COMPLIANCE REVIEW PS

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS                     

MUR No. 1150

DATE OF ORIGINAL REFERRAL 1/21/80

\*\*PURPOSE: INFORMATIONAL:

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The Colorado Building and Construction Trades Council Labor Registration Committee received a Non-filer mailgram from the Commission for failure to file the April 15, 1980 report. As a result of receiving this mailgram the committee contacted the Reports Analysis Division inquiring as to the response we required. The committee was informed that they were not validly terminated and that they were required to supply reports covering 1979 to date. (Attachment 1 - Telecon)

OUTCOME: (if applicable)

\*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).  
\*\*INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

TELECON FOR FILES

Phone: (303)861-7070

FROM: Donald McDonald

TO: Pam Brown

DATE: 4/30/80

COMMITTEE: Colorado Building and Construction Trades Labor Registration Committee

RE: Non-filer Mailgram.

---

BACKGROUND:

Yesterday Mr. McDonald called regarding the non-filer mailgram his committee had received. He stated that the committee had terminated and was, therefore, no longer required to file reports. After researching the question and discovering that a MUR was open on this committee, I discussed what advice to give the committee with Carolyn Weeder of the Office of General Counsel. We concurred that the committee should continue to file because 1) the termination was not adequate and 2) the commission will probably find RTB regarding the violations in the MUR.

TODAY:

Mr. McDonald called this evening. I had spoken with Carolyn Weeder about RAD procedures regarding termination reports and the particulars of this committee. I explained that although the committee had attempted to terminate on the Year End 1978 report, the report could not be considered valid since we needed reports for 1978-79. Since the committee was not considered terminated, we needed an April 15 1980 report as well. Mr McDonald said that if we didn't consider it valid, why didn't we inform the committee in writing? I explained that we had sent requests for the missing reports and the best advice I could give him would be to file the back reports and the Q1 1980.

81040300609

**REPORTS ANALYSIS REFERRAL UPDATE**

**\*ORIGIN:** RAD

DATE April 19, 1980

ANALYST Kevin Kelly *KK*

TO: Office of General Counsel  
ATTENTION: Gary Johnson

TEAM CHIEF Steve Mims *SM*

THROUGH: STAFF DIRECTOR *[Signature]*

COMPLIANCE REVIEW \_\_\_\_\_

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *[Signature]*

MUR No. 1150

DATE OF ORIGINAL REFERRAL 1/21/80

**\*\*PURPOSE: INFORMATION**

8  
1  
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The Colorado Building and Construction Trades Council Labor Registration Committee filed a termination report covering from their date of registration to December 31, 1979. This report discloses the contribution refund from the Kogosevek for Congress Committee. (See Attachment 1)

ON April 2, 1980 the Colorado committee contacted the Reports Analysis Division in regard to the necessity of filing a quarterly report for 1980. During the conversation the Treasurer, Mr. Anton Zafereo, was informed that the committee is still required to file reports of receipts and expenditures covering the period when they were contributing to federal candidates. (See Telecon, Attachment 2)

OUTCOME: (if applicable)

\*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).  
\*\*INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

FEC FORM 3  
 REVISED  
 January, 1978  
 Federal Election Commission  
 1225 K Street, N.W.  
 Washington, D.C. 20463

**REPORT OF RECEIPTS AND EXPENDITURES  
 FOR A CANDIDATE OR COMMITTEE  
 SUPPORTING CANDIDATE(S) FOR  
 NOMINATION OR ELECTION TO FEDERAL OFFICE**

(Except for Candidates or Committees Receiving Federal Matching Funds)

RECEIVED  
 COLLECTION  
 80 JAN 28 '80 12:24

Note: Committee authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

Colorado Building & Construction

Trades Council, Labor Registration Committee

2 I.D. No. C00114843

Name of Candidate or Committee (in full)

Candidate/Committee

Location 1, Build 1, 2860 S. Circle Drive

3 Office Sought, State/District (if applicable)

Address (number and street)

Colorado Springs, Colorado 80906

City, State and ZIP Code

Check if address is different than previously reported.

Year of Election \_\_\_\_\_

4 Type of Report (check appropriate boxes)

April 10 Quarterly Report

Tench day report preceding \_\_\_\_\_ election  
 (primary, general or convention)

Termination Report

July 10 Quarterly Report

on \_\_\_\_\_ in the State of \_\_\_\_\_  
 (date)

Amendment for:

October 10 Quarterly Report

Thorough day report following \_\_\_\_\_ election  
 (primary, general or convention)

(which report)

January 31 Annual Report

Monthly Report \_\_\_\_\_

on \_\_\_\_\_ in the State of \_\_\_\_\_  
 (month) (date)

This is a report for

Primary Election

General Election

Primary and General

Other (special, runoff, etc.)

**SUMMARY OF RECEIPTS AND EXPENDITURES**

(Figures may be rounded to nearest dollar.)

5 Covering Period <u>Oct 17, 1979</u> Through <u>Dec 31, 1979</u>	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19 79		\$ none
7 Cash on hand at beginning of reporting period	\$ none	
8 Total receipts (from line 18)	\$ 3,000.00	\$ 3,000.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 3,000.00	\$ 3,000.00
9 Total expenditures (from line 25)	\$ 3,000.00	\$ 3,000.00
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ none	\$ none
11 Value of contributed items on hand to be inventoried (Attach itemized list)	\$ _____	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ none	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ none	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Jan 22, 1980

JOHN J. DONLON

(Date)

(Typed Name of Treasurer)

(Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441, (see reverse side of form)

For further information Contact:

Federal Election Commission  
 1225 K Street, N.W.  
 Washington, D.C. 20463

or call 800/424-9630

Approved by GAO  
 B-187820 (R0908)  
 Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

001040300611  
 00115177?

**DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES**  
**Colorado Building & Coast Trades (Page 2, FEC FORM 3)**

NAME OF CANDIDATE OR COMMITTEE Council Labor Registration Committee	REPORT COVERING THE PERIOD FROM: Oct 17, 1979 TO Dec 31, 1979	
RECEIPTS	Column A This Period	Column B Calendar Year-To-Date
14. Contributions from individuals including contributions in-kind: (a) Itemized (see Schedule A) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Sales and exchanges included above: List by item on separate Schedule D (S .....		
(d) Subtotal of contributions from individuals .....	\$ .....	\$ .....
15. Transfers from Political Committees: (a) Funds from affiliated/authorized committees (itemize on Schedule A regardless of amount) .....	\$ .....	
(b) Funds from other committees (itemize on Schedule A regardless of amount) .....	\$ 3,000.00	
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount) .....	\$ .....	\$ 3,000.00
(d) Subtotal of transfers in and contributions in-kind from political committees .....	\$ .....	\$ .....
16. Other Income (a) Itemized (see Schedule A) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Subtotal of other income .....	\$ .....	\$ .....
17. Loans and Loan Repayments Received: (a) Itemized (see Schedule A) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Subtotal of loans and loan repayments received .....	\$ .....	\$ .....
18. Refunds, Rebates, Returns of Deposits (a) Itemized (see Schedule A) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Subtotal of refunds, rebates, returns of deposits .....	\$ .....	\$ .....
19. Total Receipts .....	\$ 3,000.00	\$ 3,000.00
EXPENDITURES		
20. Operating Expenditures (a) Itemized (see Schedule B) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Subtotal of operating expenditures .....	\$ .....	\$ .....
21. Loans, Loan Repayments, and Contribution Refunds Made (a) Itemized (see Schedule B) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Subtotal of loans and loan repayments made and contribution refunds .....	\$ .....	\$ .....
22. Transfers Out to Political Committees: (a) To affiliated/authorized committees (itemize on Schedule B regardless of amount) .....	\$ 3,000.00	
(b) To other committees (itemize on Schedule B regardless of amount) .....	\$ .....	
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount) .....	\$ .....	
(d) Subtotal of transfers out .....	\$ 3,000.00	\$ 3,000.00
23. Independent Expenditures (see Schedule E) .....	\$ .....	\$ .....
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 6816d) (itemize on Schedule F) .....	\$ .....	\$ .....
25. Total Expenditures .....	\$ 3,000.00	\$ 3,000.00
NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
26. Total Receipts (from line 19) .....	\$ 3,000.00	
27. Transfers In (from line 15(d)) .....	\$ .....	
28. Net Receipts (Subtract line 27 from line 26) .....	\$ 3,000.00	
29. Total Expenditures (from line 25) .....	\$ 3,000.00	
30. Transfers Out (from line 22(d)) .....	\$ .....	
31. Net Expenditures (Subtract line 30 from line 29) .....	\$ 3,000.00	

10407061773

**SCHEDULE A**  
**REVISED**  
 January, 1978  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20543

**ITEMIZED RECEIPTS**  
 (Contributions, Transfers, Contribution in-Kind,  
 Other Income, Loans, Refunds)  
 Supporting Lines 14a, 15a, 15b, 15c, 15a, 17a, and/or 18a  
 of FEC FORM 3

Page 1 of 1 for  
 Line Number 15

(Use Separate Schedules for  
 each numbered line)

Name of Candidate or Committee in Full			
Colorado Building & Const Trades Council Labor Registration Committee			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Congressman Ray Kogovsek United Bank Bldg Pueblo, Colorado	Washington, D. C. Congressman 3rd Dist Congressman	May 24, 1979	\$3,000.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$3,000.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date \$		
<b>SUBTOTAL of receipts this page (optional)</b>			3,000.00
<b>TOTAL this period (last page this line number only)</b>			3,000.00

0010400061771

**SCHEDULE B**  
**REVISED**  
 January, 1978  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

**ITEMIZED EXPENDITURES**  
 (Operating, Transfer Out, Contributions In-Kind,  
 Loans, Loan Repayments and Refunds Made)  
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c  
 of FEC FORM 3

Page 2 of 22a for  
 Line Number 22a  
 Use Separate Schedule for  
 each numbered line

Name of Candidate or Committee in Full			
Colorado Building & Const Trades Council Labor Registration Committee			
Full Name, Mailing Address and ZIP Code	Particular of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Political Education Fund Build & Const Trades Dept 815 16th St N W Room 603 Washington, D C 20006	Return of funds to the Build Trades Dept	May 25, 1979	\$3,000.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particular of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particular of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particular of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particular of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particular of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particular of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particular of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
<b>SUBTOTAL of expenditures this page (optional)</b>			<b>\$ 3,000.00</b>
<b>TOTAL this period (last page this line number only)</b>			<b>\$ 3,000.00</b>

7 8 1 0 1 0 0 3 6 1 4  
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151776

Colo Bldg & Const Trades Council  
Labor Registration Committee  
Location 1, Building 1  
2860 South Circle Drive  
Colorado Springs, Colo 80906

*Special Delivery*

3 40

**CERTIFIED**

**No. 862938**

Federal Election Commission  
1325 K Street N. W.  
Washington, D. C. 20463

*Et. Lavalat*

TELECON FOR FILES

FROM: Kevin Kelly

TO: Tony Zafereo

Phone: (303) 576-6770

DATE: 4/2/80

CITE: COLORADO BLDG & CONSTRUCTION TRADES LABOR REGISTRATION COMMITTEE

---

I returned Mr. Zafereo's calls of earlier today. He was calling because the committee had received prior notice to file the first quarter report. Mr. Zafereo stated that they had filed a termination report in January and he didn't think that they were required to file anything else. I explained that we had made an error in coding his report, listing it as a Year End report instead of a termination. I said that, until they decide to become active in federal elections again, they need not submit any future reports. However, they were still required to file the reports for 1977-1978. I explained that we had required them to register because of the contributions that they had made to Ray Kogosvek and Tim Wirth. They must file reports of receipts and expenditures covering the period when they were contributing to candidates. Mr. Zafereo said that he had filed all of this information with the secretary of State and would send it to the FEC, on the FEC forms.

81040300616

**REPORTS ANALYSIS REFERRAL SHEET**

DATE January 21, 1980 ANALYST Kevin Kelly KK  
 TO: Office of General Counsel TEAM CHIEF Steve Mims SM  
 THROUGH: STAFF DIRECTOR APP. COMPLIANCE REVIEW APP.  
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

CANDIDATE/COMMITTEE: Colorado Building and Construction Trades Council Labor Registration Committee  
 TREASURER: Anton Zafereo  
 ADDRESS: 9 East Costilla St.  
 Colorado Springs, CO 80903  
 AFFILIATE(S): N/A

ALLEGATION(S): Failure to timely register and file reports.  
 Excessive Contribution

CITE: 2 U.S.C. 433 and  
 2 U.S.C. 434  
 2 U.S.C. 441a

ATTACHMENT(S) #2

DATE INITIATED: April 9, 1979

MANNER IN WHICH REVIEW WAS INITIATED:  
 Normal Review     Other:  
 Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM N/A TO N/A  
 TOTAL RECEIPTS \$ N/A TOTAL EXPENDITURES \$ N/A  
 CASH ON HAND \$ N/A DEBTS \$ N/A

**HISTORY:**

RESULTS OF REVIEW:		ATTACHMENT
Excessive Contribution made	6/8/78	#2
Surface Violation sent for failure to register	4/9/79	#3
Excessive Contribution refunded	5/14/79	#4
Reason to Believe Notice sent	8/3/79	#5
Committee registers	10/25/79	#6
COMMUNICATIONS WITH CANDIDATE/COMMITTEE:		ATTACHMENT
Telecon	5/14/79	#7
Telecon	8/16/79	#8

REASON(S) FOR REFERRAL: ATTACHMENT

Presently, there is no minimum threshold for referrals concerning late registrations. In addition, the excessive contribution was made to an election that was decided by only 321 votes. #9

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT

Referral of the Kogosvek Committee

OTHER RELEVANT INFORMATION: ATTACHMENT

To date, the referred committee has not filed any reports of receipts and expenditures. Also, it appears that the Kogosvek for Congress Committee took out a bank loan in order to refund the money to the referred committee. #10

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

SEE REFERRAL FOR RAY KOGOVSEK FOR CONGRESS

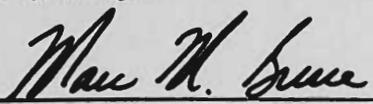
**APPLICATION or NOTICE OF ACTION REGARDING INSPECTION or COPIES OF  
 PUBLIC FINANCIAL DISCLOSURE FORMS SF 278 and SF 278A**

**I. APPLICATION**

1. Applicant's name and address: <b>Marc M. Bruce          Horne &amp; Harris          P.O. Box 706          Athens, Georgia 30603</b>	2. Date: <b>December 21, 1979</b> 3. Occupation: <b>Attorney</b>
---	---

4. If application is for or on behalf of any other person or organization give the other's name: <b>Resources for Education &amp; Management, Inc.</b>	4a. Address of the other person or organization: <b>544 Medlock Road          Decatur, Georgia 30030</b>
---	---

5. Public Financial Disclosure Forms SF 278 or SF 278A requested for the following named individuals	
a. <b>Nick Belluso</b>	d.
b.	e.
c.	f.

6. Applicant's signature:  


**II. NOTICE OF ACTION**

- The Statements you requested are enclosed. See the IMPORTANT NOTICE below.
- Your request does not comply with the requirements of the statute. Please complete Part I of this form and return so we may comply with your request.
- Other

The law requires that a report not be available to any person except upon written application by such person stating his or her name, occupation and address, and the name and address of any other person or organization on whose behalf the report is requested, and that the person be aware of the prohibitions on improper use, set forth below.

**IMPORTANT NOTICE**

Section 205 of the Ethics in Government Act of 1978 provides in part that it is unlawful for any person to obtain or use a report—

- a. for any unlawful purpose;
- b. for any commercial purpose, other than by news and communications media for dissemination to the general public;
- c. for determining or establishing the credit rating of any individual; or
- d. for use, directly or indirectly, in the solicitation of money for any political, charitable, or other purpose.

The Attorney General may bring a civil action against any person who obtains or uses a report for any such prohibited purpose as set forth above. The court may assess against such a person a penalty in any amount not to exceed \$5,000. Such remedy shall be in addition to any other remedy available under statutory or common law.

**PRIVACY ACT STATEMENT**

The Ethics in Government Act of 1978, Public Law 95-521 as amended, authorizes the solicitation of the information requested in this form. Failure to furnish the information will result in this agency's inability to allow access to, or to provide copies of, the financial disclosure forms requested. Otherwise, furnishing the requested information is voluntary. The information may be publicly disclosed pursuant to section 205 (b) of the Act, or as otherwise authorized by law.

8-10403008

FEDERAL ELECTION COMMISSION  
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) 1979-1980

DATE 2JAN80  
 PAGE

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
	COLORADO BUILDING & CONSTRUCTION TRADE COUNCIL LABOR REGISTRATION COMMITTEE CONNECTED ORGANIZATION: BLANK 1979 STATEMENT OF ORGANIZATION					25OCT79		ID# C00114843 5 79FEC/140/3344

Form 1 - Reviewed

6 1 9 0 0 2 0 7 0 1 8

Contributions, Ticket Purchases, Loans,  
Rebates, and Transfers for Line  
Numbers 15, 16, 17 and/or 18 of FEC Form 3  
(see instructions on back)

These amounts are reported for each  
contribution made

81040300620

Name of Candidate or Committee in full		Date (month, day, year)	Amount of each receipt this period
JAY S GUYER FOR S NG 1976			
Full Name, mailing address and ZIP code Colo. Building, Const. Trades Council Labor Registration Comm.		12-21-77	1000.00
Principal place of business 9 E. Castilla Colo. Sprgs, Co 80903	Occupation None <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$ 1000		
Full Name, mailing address and ZIP code Lawrence Allen 324 Thatcher Bldg., Pueblo, Co. 81003		12-23-77	100.00
Principal place of business same as above	Occupation Attorney <input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$ 100		
Full Name, mailing address and ZIP code David Donley Rt. 3, Box 87 Pueblo, Co 81004		12-19-77	100.00
Principal place of business Same as above	Occupation Dairy Owner <input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$ 100		
Full Name, mailing address and ZIP code James James Denver, Colorado		12-28-77	100.00
Principal place of business Denver, Colorado	Occupation Consultant <input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$ 100		
Full Name, mailing address and ZIP code Charles Brady 1401 Elizabeth Pueblo, Co 81003		12-12-77	200.00
Principal place of business same as above	Occupation Dentist <input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$ 200		
Full Name, mailing address and ZIP code Stanley G. & Dorothy Childers 327 Grace, Pueblo, Co 81004		11-30-77	100.00
Principal place of business same as above	Occupation Dental Doctor <input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ..... ▶ \$ 100.00		
Subtotal of receipts this page (optional) .....			\$ 1600.00
Total this period (last page this line number only) .....			\$

FORM 709  
REVISED  
January, 1978  
Federal Election Commission  
1225 K Street, N.W.  
Washington, D.C. 20005

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution in-Kind,  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Page 2 of 4  
Line Number 140

Use Separate Schedule for  
each numbered line!

1st of each Receipt  
in Period  
30.00

2nd of each Receipt  
in Period  
100.00

3rd of each Receipt  
in Period  
125.00

4th of each Receipt  
in Period  
225.00

5th of each Receipt  
in Period  
225.00

6th of each Receipt  
in Period  
203.45

In-kind  
plane and  
pilot  
1013.45

7501141030

Name of Candidate or Committee in Full		Principal Place of Business		Date (month, day, year)	Amount of each Receipt (in Period)
Ray Rogosvek for Congress		Western National Bank Federal at Alameda Denver, Colorado 80219		4/14/78	100.00
Full Name, Mailing Address and ZIP Code Rosa Lee Samuels 168 S. Vance Ct. Denver, Colorado 80225		Occupation Executive Assistant			
Reason for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year-To-Date \$ 100.00			
Full Name, Mailing Address and ZIP Code Sheetmetal Workers International Association Political Action League 1750 New York Avenue, N.W. Washington, D.C. 20006		Principal Place of Business 1750 New York Ave. NW Washington, D.C.		4/19/78	500.00
Reason for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year-To-Date \$ 500.00			
Full Name, Mailing Address and ZIP Code Drive Political Fund 25 Louisiana Avenue, N.W. Washington, D.C. 20001		Principal Place of Business 25 Louisiana Ave., N.W. Washington, D.C. 20001		4/27/78	500.00
Reason for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year-To-Date \$ 500.00			
Full Name, Mailing Address and ZIP Code D. Bonicelli 809 South Main Walsenburg, Colorado 81089		Principal Place of Business 809 S. Main Walsenburg, Colorado 81089		4/28/78	20.00
Reason for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year-To-Date \$ 100.00		5/28/78	20.00
Full Name, Mailing Address and ZIP Code Automobile & Truck Dealers Election Action Committee 8400 Westpark Drive McLean, Virginia 22101		Principal Place of Business 8400 Westpark Drive McLean, Virginia 22101		5/15/78	2,500.00
Reason for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year-To-Date \$ 2,500.00			
Full Name, Mailing Address and ZIP Code Carpenter's Legislative Improve- ment Committee 101 Constitution Ave., N.W. Washington, D.C. 20001		Principal Place of Business 101 Constitution Ave. NW Washington, D.C. 20001		5/1/78	500.00
Reason for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year-To-Date \$ 500.00			
Full Name, Mailing Address and ZIP Code Colorado Building & Construc- tion Trades Council-Labor Registration Committee 9 East Costilla Colorado Springs, CO 80903		Principal Place of Business 9 East Costilla Colorado Springs, CO 80903		6/8/78	3,000.00
Reason for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year-To-Date \$ 4,000.00			
SUBTOTAL of receipts this page (optional)					\$ 7,140.00
TOTAL this period (last page this line number only)					\$



In reply please refer to 2SV1/78-109



**FEDERAL ELECTION COMMISSION**

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

April 9, 1979

**Treasurer**  
Colorado Building and Construction Trades  
Council Labor Registration Committee  
Nine East Costilla Street  
Colorado Springs, CO 80903

Dear Sir or Madam:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by Committee for Tim Wirth, Inc. and Ray Kogovsck for Congress indicates that your organization may have made contributions which total in excess of \$1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

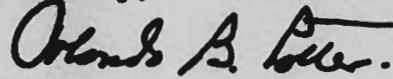
If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed \$1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

01040300623

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact Kurt Burkhardt, in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-4048.

Sincerely,



Orlando B. Potter  
Staff Director

Certified Mail  
Return Receipts Requested

Enclosures

81040300624







FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 3, 1979

Treasurer  
Colorado Building and Construction  
Trades Council Labor Registration Committee  
Nine East Costilla Street  
Colorado Springs, CO 80903

Dear Treasurer:

On April 9, 1979, you were notified that you may have made contributions to a political committee which raised problems under 2 U.S.C. 433 and 434.

We received a response from you on May 21, 1979, however, we found your response to be inadequate. Your failure to provide an adequate response gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 433.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact Beverly Brown, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202) 357-0026.

Sincerely,

*Joan D. Arkin*  
Commissioner

Certified Mail:  
Return Receipt Requested

81040300627

TELECON:

COMMITTEE: COLORADO BUILDING AND CONSTRUCTION TRADES COUNCIL LABOR REGISTRATION  
COMMITTEE

COMMITTEE CONTACT: MR. JIM FATTOR, ATTORNEY

ANALYST: BEVERLY BROWN

DATE: 8/16/79

CONCERNING: RTB NOTICE : SURFACE VIOLATION 78-109  
Failure to Register

-----

Mr. Fattor called in response to letter received from the treasurer of the above committee. The letter simply stated that the Commission was in need of additional information and that Mr. Fattor should respond. The treasurer then left town on vacation without identifying the information required by the Commission.

I informed Mr. Fattor that the Colorado Building and Construction Trades Council Labor Registration Committee received a letter from the Commission on 4/9/79. This letter served to inform the committee of the requirements to register as the committee had qualified as a political committee under the ACT.

On 5/14/79 the committee responded after speaking with reports analyst, Rob Snow. The committee indicated that a Statement of Organization would be forthcoming.

On 8/3/79 the commission still had not received the committee's statement of organization and, therefore, a second notice was sent.

I informed Mr. Fattor of the committee's options:

- 1) the committee may register and request a refund of \$3000 (excessive contribution) from Ray Kogosvek.
- 2) the committee may request a refund of \$4000 from Ray Kogosvek and \$120 from Tim Worth.

Mr. Fattor was further informed of the disclosure requirements surrounding registration and reporting of prior activity.

81049300629

# Statement of Organization For a Political Committee

Supporting any candidate for federal office and anticipating contributions or expenditures in excess of \$1,000 in any calendar year in support of such candidate.  
(See Reverse Side For Instructions.)

RECEIVED  
FEDERAL ELECTION  
COMMISSION

**Note:** Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Committee (In full) <input type="checkbox"/> Check if name or address is changed <b>COLORADO BUILDING &amp; CONSTRUCTION TRADES COUNCIL LABOR REGISTRATION COMMITTEE</b>	2 Identification Number  
1(b) Address (number and street) <b>9 East Costilla Street</b>	3 Date <b>October 17, 1979</b>
1(c) City, State and ZIP code <b>Colorado Springs, Colorado 80903</b>	4 Is this an amended statement <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "YES" FILL IN ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE

5 Check one:

(a) This committee has been designated as the principal campaign committee for \_\_\_\_\_ (Name of Candidate) a candidate for \_\_\_\_\_ in the \_\_\_\_\_ Election (Federal office sought) (Year of election) to be held in the State of \_\_\_\_\_ (State in which election is held)

(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

(b) This committee is supporting only one candidate, and is authorized by \_\_\_\_\_ (Name of Candidate) to receive contributions and make expenditures with respect to the \_\_\_\_\_ Election (General, Primary, Runoff, etc) held in \_\_\_\_\_, and will file all reports and statements with the candidate's principal campaign committee, \_\_\_\_\_ (Year of election in State) \_\_\_\_\_ (Full name of principal campaign committee)

(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (FEC FORM 2a)

(c) This committee supports only one candidate \_\_\_\_\_ (Name of Candidate) but is not an authorized committee.

(d) This committee supports more than one Federal candidate and is not a party committee.

(e) This committee is a \_\_\_\_\_ committee of the \_\_\_\_\_ Party. (National, State, county, city) (Democratic, Republican, etc.)

6 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship
N/A		

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

Corporation     
  Labor organization     
  Membership organization     
  Trade association     
  Cooperative  
 Corporation without capital stock     
  Other (please specify)

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

81040300629 1403345

**UNITED LABOR REGISTRATION COMMITTEE**

.....  Yes  No  
 .....  Yes  No  
 .....  Yes  No  
 .....  Yes  No

List by name, address, office sought, and party affiliation, any candidate for Federal office that this committee is supporting:

Name of candidate(s)	Mailing address and ZIP code	Office sought	Party

List by name, address, office sought, and party affiliation, any candidate(s) for any other public office(s) that this committee is supporting (unless the committee is supporting the entire ticket of a party as indicated in line 9)

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party

If this committee is supporting the entire ticket of a party, give name of party ► **DEMOCRAT**

10 Identify by name, address and position, the person in possession of committee books and records:

Full name	Mailing address and ZIP code	Title or position
Anton Zafereo	9 East Costilla Street Colorado Springs, CO 80903	

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

91031030

Statement of Organization for a Committee

(Page 3)

**COLORADO BUILDING AND CONSTRUCTION TRADES COUNCIL LABOR REGISTRATION COMMITTEE**

List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee):

Full name	Mailing address and ZIP code	Title or position
John J. Donlon	1540 Emerson Street Denver, Colorado 80218	
Anton Zafereo	9 East Costilla Street Colorado Springs, CO 80903	

- 12 Does this committee plan to stay in existence beyond the current calendar year? .....  Yes  No  
 If "Yes" for how long? .....
- 13 In the event of dissolution, what disposition will be made of residual funds? N/A

14 List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

Name of bank, repository, etc.	Mailing address and ZIP code
Central Bank of Colorado Springs	2308 East Pikes Peak Colorado Springs, Colorado

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 43B(a)):

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code
Campaign Report	Sept. 1	Secretary of State	State Services Building
Campaign Report	Oct. 12	"	1525 Sherman Street
Campaign Report	Oct. 27	"	Denver, Colorado 80203
Campaign Report	Dec. 7	"	
Campaign Report	Jan 15	"	

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

*John J. Donlon*  
 (Signature of Treasurer)

12/19/79  
 (Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g or §441j (see instructions)

For further information contact:



Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

**Election Results - 2**

House		Vote Total	Per Cent
1 Bill Alexander (D)*	X	X	X
2 Doug Brandon (D)		62,057	49
Ed Bethune (R)		65,174	51
3 William C. Moors (D)		32,161	21
John Paul Hammerschmidt (R)*		118,967	79
4 Beryl F. Anthony Jr. (D)	X	X	X

**CALIFORNIA**

Governor		Vote Total	Per Cent
Edmund G. Brown Jr. (D)*		3,835,946	56
Evelle J. Younger (R)		2,491,414	36
Theresa F. Dietrich (AM I)		66,105	1
Marilyn Seals (PFP)		69,891	1
Ed Clark (I)		374,047	5

House		Vote Total	Per Cent
1 Harold T. Johnson (D)*		119,359	60
James E. Taylor (R)		80,390	40
2 Norma Berk (D)		98,032	46
Don H. Clauson (R)*		112,135	54
Irv Suttley (PFP)		—	—
3 Robert T. Matsui (D)		104,488	54
Sandy Smoley (R)		90,991	46
4 Vic Fazio (D)		86,618	56
Rex Himo (R)		69,224	44
5 John L. Burton (D)*		105,110	67
Dolores Shore (R)		52,075	33
6 Phillip Burton (D)*		81,140	72
Tom Spina (R)		33,101	28
Raymond O. Hoops (AM I)		—	—
7 George Miller (D)*		109,172	66
Paula Gordon (R)		58,047	34
Malvin E. Stanley (AM I)		—	—
8 Ronald V. Dellums (D)*		94,433	58
Charles V. Hughes (R)		70,090	42
9 Fortney H. (Pete) Stark (D)*		87,865	69
Robert S. Allen (R)		40,942	31
Lawrence J. Phillips (PFP)		—	—
10 Don Edwards (D)*		104,103	72
Rudy Hansen (R)		41,152	28
11 Leo J. Ryan (D)*		92,135	63
David Welch (R)		54,267	37
Nicholas W. Kudrozzoff (AM I)		—	—
12 Kristen Olsen (D)		34,190	22
Paul N. McCloskey Jr. (R)*		115,990	78
Harold Boylan (AM I)		—	—
Adele Fumino (PFP)		—	—
13 Norman Y. Mineta (D)*		99,899	60
Don O'Keefe (R)		68,560	40
Robert Goldsborough (PFP)		—	—
14 John J. McFall (D)*		69,683	44
Norman D. Shumway (R)		87,300	56
George D. Waldron (AM I)		—	—
15 Tony Coelho (D)		74,631	61
Chris Paterakis (R)		49,390	39
16 Leon E. Panetta (D)*		102,932	62
Eric Seastrom (R)		64,704	38
17 John Krebs (D)*		67,246	45
Charles (Chip) Pashayan Jr. (R)		80,644	55
18 Bob Sasse (D)		58,245	41
William Thomas (R)		84,437	59
19 Jerome Zamos (D)		41,508	24
Robert J. Lagomarsino (R)*		127,703	72
Milton Shire Takei (PFP)		6,848	4
20 Pat Leav (D)		62,566	33
Barry M. Goldwater Jr. (R)*		124,451	67
21 James C. Carmann (D)*		72,776	63
G. (Rex) Walsh (R)		43,745	37
Bill Hill (PFP)		—	—

	Vote Total	Per Cent
22 Robert S. Henry (D)	53,536	35
Carlos J. Moorhead (R)*	97,263	65
23 Anthony C. (Tony) Bollenson (D)*	115,109	66
Joseph Barbara (R)	60,046	34
24 Henry A. Wasson (D)*	83,540	67
Howard G. Schaefer (R)	43,012	33
Kevin Casey Peters (PFP)	—	—
25 Edward R. Raybal (D)*	45,188	68
Robert K. Watson (R)	21,681	32
26 John H. Rausstell (R)*	X	X
27 Corey Peck (D)	84,364	49
Robert K. Darnon (R)*	86,904	51
28 Julian C. Dixon (D)	X	X
29 Augustus F. Hawkins (D)*	64,333	85
Uriah J. Fields (R)	11,251	15
30 George E. Daniehon (D)*	65,419	71
Henry Ares (R)	26,090	29
31 Charles H. Wilson (D)*	54,891	68
Don Grimshaw (R)	26,024	32
32 Glenn M. Anderson (D)*	72,893	72
Sonya (Sonny) Mathison (R)	22,714	22
Ida Bader (AM I)	6,270	6
33 Dennis S. Kazorian (D)	61,742	44
Wayne Grisham (R)	78,233	56
34 Mark W. Mansford (D)*	72,636	44
Daniel E. Lungren (R)	89,189	54
Lawrence J. Stafford (AM I)	4,341	3
35 Jim Lloyd (D)*	79,599	54
David Drier (R)	67,730	46
36 George E. Brown Jr. (D)*	80,191	63
Dana Warren Carmody (R)	47,269	37
37 Don Corcoran (D)	59,902	35
Jerry Lewis (R)	106,085	61
Bernard Wohl (AM I)	6,516	4
38 Jerry M. Patterson (D)*	74,426	59
Don Goodale (R)	52,437	41
39 William E. Farris (D)	63,115	36
William E. Donnemeyer (R)	110,513	64
40 Jim McGuy (D)	75,074	34
Robert E. Badham (R)*	144,846	66
41 King Golden Jr. (D)	76,062	41
Bob Wilson (R)*	105,321	59
42 Lionel Van Deerlin (D)*	83,572	74
Lawrence C. Mattera (R)	29,759	26
43 Ruben B. Brooks (D)	69,931	30
Clair W. Burgener (R)*	158,431	70

**COLORADO**

Governor		Vote Total	Per Cent
Richard D. Lamm (D)*		483,506	60
Ted Strickland (R)		317,029	40
Earl F. Dodge (NAT S)		—	—
Sal A. Mander (NEUT)		—	—
Elio Blum (SOC WORK)		—	—
E. L. Roy Peister (TEA)		—	—
Senator			
Floyd K. Haskell (D)*		330,080	41
William L. Armstrong (R)		480,305	59
House			
1 Patricia Schroeder (D)*		87,732	63
Gene Hutcherson (R)		49,892	37
Iris Adley (SOC WORK)		—	—
2 Timothy E. Wirth (D)*		98,887	53
Ed Scott (R)		88,057	47
3 Ray Eggenrich (D)		78,893	50
Harold E. McCormick (R)		88,742	50
Henry E. Blshaw (R)		—	—

	Vote Total	Per Cent
4 Margen Smith (D)	65,291	38
James P. (Jim) Johnson (R)*	103,180	62
5 Gerry Frank (D)	52,911	36
Ken Kramer (R)	91,935	64
L. W. Don Bridges (I)	—	—

**CONNECTICUT**

Governor		Vote Total	Per Cent
Ella T. Grasso (D)*		610,719	59
Ronald A. Sarasin (R)		421,878	41
House			
1 William R. Catter (D)*		101,947	61
Ben F. Andrews Jr. (R)		67,278	39
Donna C. McDonough (USLP)		—	—
2 Christopher J. Dodd (D)*		116,207	70
Thomas H. Connell (R)		51,406	30
3 Robert N. Gisimo (D)*		95,829	60
John G. Pucciano (R)		65,786	40
Jacelle R. Fishman (COM)		—	—
4 Michael G. Margon (D)		59,305	41
Stewart B. McKinney (R)*		81,905	59
5 William R. Ratchford (D)		95,472	53
George C. Guidera (R)		86,714	47
6 Toby Moffett (D)*		119,025	65
Daniel F. MacKinnon (R)		66,551	35

**DELAWARE**

Senator		Vote Total	Per Cent
Joe Biden (D)*		93,926	58
James H. Baxter Jr. (R)		66,636	42
Donald G. Gies (AM)		—	—
House			
Al Gary E. Mindes (D)		64,819	41
Thomas B. Evans Jr. (R)*		91,787	59
James E. Nicks (AM)		—	—

**FLORIDA**

Governor		Vote Total	Per Cent
Robert Graham (D)		1,377,261	56
Jack M. Eckerd (R)		1,095,226	44
House			
1 Earl D. Mutto (D)		81,976	63
Warren Briggs (R)		48,503	37
2 Don Fuqua (D)*		107,979	82
Peter L. W. Brathwaite (R)		24,081	18
3 Charles E. Bennett (D)*		X	X
4 Bill Chappell Jr. (D)*		109,918	74
Tom Boney (R)		40,282	26
5 David R. Best (D)		100,035	48
Richard Kelly (R)*		104,484	52
6 James A. Christison (D)		40,654	21
C. W. Bill Young (R)*		150,694	79
7 Sam Gibbons (D)*		X	X
8 Andy Ireland (D)*		X	X
9 Bill Nelson (D)		81,486	61
Edward J. Gurney (R)		53,219	39
10 L. A. (Skip) Bufalis (R)*		X	X
11 Don Mica (D)		122,370	56
Bill James (R)		98,788	44
12 Edward J. Stock (D)		104,653	62
J. Herbert Burke (R)*		64,793	38
13 William Lehman (D)*		X	X

REGISTERED MAIL

REPORT OF RECEIPTS AND EXPENDITURES FOR A CANDIDATE OF CONGRESS DEBTS AND OBLIGATIONS

FORM 278E  
REVISED  
January, 1978  
Federal Election Commission  
1200 G Street, N.W.  
Washington, D.C. 20463

Supporting Line Numbers 12 and 13  
of FEC FORM 2

Page 1 of 1  
Line Number 13  
1978  
4-11-82

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full				
<b>Ray Kogovsek for Congress Committee</b>				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
The Pueblo Bank & Trust Co. 301 W. 5th Street Pueblo, Colorado 81003	5/10/79			
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		\$ 3,000	\$ None	\$ 3,000
NATURE OF OBLIGATION (Details of Debt)				
Unsecured 90 day note, 11.5% interest, made by Ray Kogovsek for Congress Committee, guaranteed \$1,000 by each person listed in Attachment A				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
Midtown National Bank Midtown Shopping Center Pueblo, Colorado 81003	8/3/78			
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		\$ 7,000	\$ 7,000	\$ none
NATURE OF OBLIGATION (Details of Debt)				
Commercial loan made by candidate for personal and family living expenses - previously listed				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
NATURE OF OBLIGATION (Details of Debt)				
NATURE OF OBLIGATION (Details of Debt)				
SUBTOTALS this period (this page optional) . . . . .		\$	\$	\$
TOTAL this period (last page this line number only) . . . . .		\$ 3,000	\$ 7,000	\$ 3,000
Carry outstanding balance only to appropriate line of summary				

8/19/00 4 01 3, 00 6: 3 3

10

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Ray Kogovsek for Congress ) MUR 1146

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 21, 1980, the Commission decided by a vote of 6-0 to merge MUR 1146 into MUR 1150.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

2/21/80

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary to the Commission

81040300634

Received in Office of the Commission Secretary: 2-15-80, 1:42  
Circulated on 48 hour vote basis: 2-19-80, 11:00

February 15, 1980

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 1146

Please have the attached First GC Report on MUR 1146 distributed to the Commission on a 48 hour tally basis.

Thank you.

81040300635

FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20003

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION 2-15-80

MUR # 1146  
STAFF MEMBER(S) \_\_\_\_\_  
Duane A. Brown

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: Ray Kogovsek for Congress

RELEVANT STATUTE: 2 U.S.C. § 441a(f)

INTERNAL REPORTS CHECKED: Ray Kogovsek for Congress  
Colorado Building and Construction Trades  
Council

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

On January 21, 1980, the Reports Analysis Division referred the following respondents to the Office of the General Counsel. The Ray Kogovsek for Congress Committee (MUR 1146) accepted a contribution of \$3,000 from the Colorado Building and Construction Trades Council-Labor Registration Committee, ("the Labor Committee") (MUR 1150). At the time of the contribution, the Labor Committee was not registered with the Commission.

FACTUAL AND LEGAL ANALYSIS

Upon receiving both matters in the Office of General Counsel, each was assigned a separate MUR number.

Inasmuch as both RAD referrals pertain to violations of the Act committed as a result of the same action, both matters should be considered jointly. Therefore, the Office of General Counsel recommends that MUR 1146 be merged into MUR 1150.

80 FEB 15 P 1:42

COMMUNICATIONS SECTION

6  
5  
6  
0  
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0  
1  
8

RECOMMENDATION

1. Merge MUR 1146 into MUR 1150.

Attachments

Referral

81040300637

**REPORTS ANALYSIS REFERRAL SHEET**

DATE January 21, 1980 ANALYST Beverly White BW  
 TO: Office of General Counsel TEAM CHIEF Suzanne Wilson SW  
 THROUGH: STAFF DIRECTOR JSP. COMPLIANCE REVIEW Carroll Bowen CB/OS  
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

CANDIDATE/COMMITTEE: Ray Kogovsek for Congress  
 TREASURER: Thomas E. Jagger  
 ADDRESS: 127 First National Bank  
Pueblo, CO 81003  
 AFFILIATE(S): n/a

1146

ALLEGATION(S): Accepted excessive contribution from unregistered committee CITE: 2 U.S.C. 441(a) ATTACHMENT(S) 2

DATE INITIATED:

MANNER IN WHICH REVIEW WAS INITIATED:

- Normal Review
- Other:
- Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment I.

PERIOD COVERED FROM 4/1/78 TO 6/30/78

TOTAL RECEIPTS \$ 15,981 TOTAL EXPENDITURES \$ 14,952

CASH ON HAND \$ 11,456 DEBTS \$ 1,500

HISTORY:

RESULTS OF REVIEW:

A Surface Violation letter was mailed to the committee on 4/9/79. ATTACHMENT 3  
 A response was received on 5/29/79, indicating a refund had been made; ATTACHMENT 5  
 however, an RTB notification was sent in error on 6/8/79. ATTACHMENT 6  
 The committee's July 10 report (received 9/14/79) itemized the refund. ATTACHMENT 7

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Penny Harms spoke with the treasurer on April 30, 1979. ATTACHMENT 4

REASON(S) FOR REFERRAL:

ATTACHMENT

The contribution, although refunded, exceeds the Commission threshold for review by OGC.

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

NONE

OTHER RELEVANT INFORMATION:

ATTACHMENT

not pertinent

SEE REFERRAL FOR COLORADO BUILDING AND CONSTRUCTION TRADES COUNCIL

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
RAY KOGOVSEK FOR CONGRESS								ID# C00082701
1977	STATEMENT OF ORGANIZATION					21NOV77	3	77HSE/127/1275
	REQUEST FOR ADDITIONAL INFORMATION					8DEC77	2	77FEC/062/3359
1978	STATEMENT OF ORGANIZATION- AMENDMENT					31JAN78	3	78HSE/129/3564
	48 HOUR CONTRIBUTION NOTICE					31OCT78	1	78HSE/154/0063
	48 HOUR CONTRIBUTION NOTICE					2NOV78	1	78HSE/154/3713
	48 HOUR CONTRIBUTION NOTICE					2NOV78	1	78HSE/154/3822
	48 HOUR CONTRIBUTION NOTICE					6NOV78	1	78HSE/155/0025
	48 HOUR CONTRIBUTION NOTICE					8NOV78	1	78HSE/155/1308
	48 HOUR CONTRIBUTION NOTICE					13NOV78	1	78HSE/155/1050
1977	OCTOBER 10 QUARTERLY	3,382		1,940		15APR77 -30SEP77	6	78HSE/130/0817
	OCTOBER 10 QUARTERLY - AMENDMENT					15APR77 -30AUG77	1	78HSE/129/3529
	OCTOBER 10 QUARTERLY - AMENDMENT	7,282		4,944		15APR77 -30SEP77	5	78HSE/146/0800
	YEAR END REPORT	11,496		6,261		1OCT77 -31DEC77	11	78HSE/129/3479
	REQUEST FOR ADDITIONAL INFORMATION					1OCT77 -31DEC77	3	78FEC/076/3941
	YEAR END REPORT - AMENDMENT					1OCT77 -31DEC77	6	78HSE/142/2007
	YEAR END REPORT - AMENDMENT	11,496		7,062		7OCT77 -31DEC77	3	78HSE/146/0877
1978	APRIL 10 QUARTERLY	14,496		10,646		1JAN78 -31MAR78	10	78HSE/133/2352
	REQUEST FOR ADDITIONAL INFORMATION					1JAN78 -31MAR78	3	78FEC/076/3925
	APRIL 10 QUARTERLY - AMENDMENT					1JAN78 -31MAR78	3	78HSE/141/1044
	REQUEST FOR ADDITIONAL INFORMATION					1JAN78 -31MAR78	3	79FEC/116/5204
	APRIL 10 QUARTERLY - AMENDMENT					1JAN78 -31MAR78	1	79HSE/165/3422
	10 DAY PRE-PRIMARY	10,126		19,555		1JUL78 -28AUG78	15	78HSE/144/2870
	REQUEST FOR ADDITIONAL INFORMATION					1JUL78 -28AUG78	2	79FEC/134/3582
	10 DAY PRE-PRIMARY - AMENDMENT	17,126		26,133		1JUL78 -28AUG78	7	78HSE/146/0906
	REQUEST FOR ADDITIONAL INFORMATION					1JUL78 -28AUG78	5	78FEC/146/1896
	REQUEST FOR ADDITIONAL INFO 2ND					1JUL78 -28AUG78	2	79FEC/134/3580
	10 DAY PRE-PRIMARY - AMENDMENT					1JUL78 -28AUG78	2	79HSE/185/2919
	10 DAY PRE-PRIMARY - AMENDMENT					1JUL78 -28AUG78	4	79HSE/165/2927
	30 DAY POST-PRIMARY	0		101		1OCT78 - 2OCT78	3	78HSE/150/2137
	JULY 10 QUARTERLY	15,981		14,952		1APR78 -30JUN78	13	78HSE/141/4053
	REQUEST FOR ADDITIONAL INFORMATION					1APR78 -30JUN78	3	78FEC/116/0456
	REQUEST FOR ADDITIONAL INFO 2ND					30JUN78	2	79FEC/134/0249
	REQUEST FOR ADDITIONAL INFORMATION					30JUN78	2	79FEC/123/195
	JULY 10 QUARTERLY - AMENDMENT					1APR78 -30JUN78	6	79HSE/165/2921
	JULY 10 QUARTERLY - AMENDMENT					30JUN78	1	79HSE/165/3275
	OCTOBER 10 QUARTERLY		12,681		7,756	13SEP78 -30SEP78	17	78HSE/150/2237
	OCTOBER 10 QUARTERLY - AMENDMENT		15,227		12,635	29AUG78 -30SEP78	16	78HSE/159/3435
	REQUEST FOR ADDITIONAL INFORMATION					29AUG78 -30SEP78	3	79FEC/116/5200
	OCTOBER 10 QUARTERLY - AMENDMENT		15,227		12,635	29AUG78 -30SEP78	22	79HSE/165/3512
	10 DAY PRE-GENERAL		15,104		17,750	1OCT78 -23OCT78	15	78HSE/153/4473
	10 DAY PRE-GENERAL - AMENDMENT		15,105		17,852	1OCT78 -23OCT78	4	78HSE/159/3431
	30 DAY POST-GENERAL		24,124		25,857	24OCT78 -27NOV78	19	78HSE/159/3412
	REQUEST FOR ADDITIONAL INFORMATION					24OCT78 -27NOV78	3	79FEC/130/0309
	YEAR END REPORT		841		1,141	28NOV78 -31DEC78	5	79HSE/162/4864
	TOTAL	66,381	55,297	63,838	57,485		240	TOTAL PAGES

All Reports Reviewed

FEDERAL ELECTION COMMISSION  
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) 1979-1980

DATE 4DEC79  
 PAGE

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
RAY KOSOVSEK FOR CONGRESS			9,460		9,448	1JAN79 -31MAR79		ID# C00082701
	1979 APRIL 10 QUARTERLY		13,155		12,806	1APR79 -30JUN79		9 79HSE/165/1082
	JULY 10 QUARTERLY							14 79HSE/168/1381
	TOTAL	0	22,615	0	22,254			23 TOTAL PAGES

All Reports Reviewed

8 1 0 4 0 3 0 0 6 4 0







FEDERAL ELECTION COMMISSION

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

9 April 1979

Thomas E. Jagger, Treasurer  
Ray Kogosvek for Congress  
127 First National Bank Building  
Pueblo, Colorado 81003

Dear Mr. Jagger:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the July 10 Quarterly Report of Receipts and Expenditures, we noticed an entry indicating that you may have received a contribution which exceeds the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

The Act precludes individuals and political committees, other than multicandidate committees, from making political contributions to a candidate for Federal election in excess of \$1,000 per election. The Act defines a multicandidate committee as one which has been registered for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office. The committee listed as the source of the contribution in question does not presently qualify as a multicandidate committee and we have notified them accordingly. We have recommended that the source committee notify you if it is confirmed that the contribution was in excess of the limits.

The Commission recommends that if you find the contribution you received was in excess of the limits set forth in the Act you return the amount in excess of \$1,000 to the donor. This return should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

81040300643

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Penny Harms (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4172.

Sincerely,

*Orlando B. Potter*

Orlando B. Potter  
Staff Director

Certified Mail  
Return Receipt Requested

81040300644

PS Form 3811, Apr 1977

RECEIVED 456.176-165 FH

SENDER Complete items 1, 2, and 3. Add your address in the RETURN TO space on reverse.

1. The following service is requested (check one):  
 Show to whom and date delivered ..... C  
 Show to whom, date, and address of delivery ..... C  
 RESTRICTED DELIVERY Show to whom and date delivered ..... C  
 RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

3. ARTICLE DESCRIPTION:  
 REGISTERED NO | CERTIFIED NO | INSURED NO  
 | 943-252 | |

(Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE  Addressee  Authorized agent

4. DATE OF DELIVERY: POSTMARK  
 APR 13 1979  
 CLERK'S INITIALS

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

JACER

☆GPO 1977-0-249-595

MEMORANDUM: FOR FILES

RE: TELECON

FROM: Tom Jagger, Treasurer. to Penny Harms

DATE: April 30, 1979

NAME OF COMMITTEE: RAY KOGOVSEK FOR CONGRESS; CO/3

(303) 545-4412

---

Mr. Jagger called about a surface violation letter they received on a/ excessive possible.  
contribution from the Colo. Bldg. & Construction Trades Council. As far as we  
know, they are unregistered. Mr. Jagger said he has been trying to get in touch  
with the person on their committee who knew when the \$ came in and all the details,  
and that that person is now checking into the matter. He said it will probably  
take a couple more days, but he wanted to let us know they were looking into it.  
The SV letter was dated April 9. Mr. Jagger will be back in touch with us just as  
soon as they are able to find out anything.

81049300645

MAY 26 1979  
REGULAR MAIL

LAW OFFICES OF  
THOMAS E. JAGGER  
SUITE 187  
FIRST NATIONAL BANK BUILDING  
PUEBLO, COLORADO 81003

RECEIVED  
FEDERAL ELECTION  
COMMISSION

MAY 29 PM 2:50

THOMAS E. JAGGER  
DAVID A. GALE  
JOHN S. BOGREN  
PAUL J. WILKINSON

TELEPHONE  
AREA CODE 303  
4-4412  
RECEIVED  
REGISTRATION  
MAY 30 AM 11:27  
U.S. HOUSE OF REPRESENTATIVES  
OFFICE OF CLERK

May 25, 1979

Ms. Penny Harms  
Reports Analyst  
Federal Election Commission  
1325 K. Street N.W.  
Washington, D.C. 20463

Re: Ray Kogovsek for Congress  
Committee  
No. CO 072010

Dear Ms. Harms:

After reviewing your letter of April 9, 1979 relating to receipt of contributions in excess of limits, we thoroughly reviewed the matter and are of the opinion that your interpretation is correct. The Committee has this date refunded \$3,000 in excess contributions to: Colorado Building & Construction Trades Council-Labor Registration Committee, 9 East Costilla, Colorado Springs, Colorado which was not a duly registered multicandidate committee.

Thank you very kindly for your cooperation in this matter.

Very truly yours,  
RAY KOGOVSEK FOR CONGRESS COMMITTEE

*Thomas E. Jagger*  
Thomas E. Jagger  
Treasurer

TEJ:sm

81040309646  
7901153275



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

7/8

June 8, 1979

Thomas E. Jagger, Treasurer  
Ray Kogosvek for Congress  
127 First National Bank  
Building  
Pueblo, CO 81003

Dear Mr. Jagger:

On April 9, 1979, you were notified that certain entries in the July 10 Quarterly Report of Receipts and Expenditures filed by your committee raised problems under 2 U.S.C. 441a.

As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 441a.

The Commission intends to take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact ~~Penny Harms~~, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202)523-4172.

*Beverly White*

Sincerely,

*Allen A. Friedland*  
Commissioner

Certified Mail:  
Return Receipt Requested

8104030647

81040300648

*6645-2178-143PM Kozmick*

Post Office 3011 Apr 1977

● SENDER Complete items 1, 2, and 3  
Add your address in the 'RETURN TO' space on reverse

1. The following service is requested (check one)

Show to whom and date delivered ..... C

Show to whom, date, and address of delivery ..... C

RESTRICTED DELIVERY  
Show to whom and date delivered ..... C

RESTRICTED DELIVERY  
Show to whom, date, and address of delivery \$ \_\_\_\_\_  
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

*T. JAGGER*

3. ARTICLE DESCRIPTION:

REGISTERED NO	CERTIFIED NO	INSURED NO.
	<i>418057</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE  Addressee  Authorized agent

4. *X* *Mellor Medina*

DATE OF DELIVERY	POSTMARK
<i>6-11-79</i>	<i>JUN 11 1979</i>

5. ADDRESS (Complete only if requested)

*3025*

6. UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

*Jagger*

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE January 21, 1980 ANALYST Beverly White BW  
TO: Office of General Counsel TEAM CHIEF Suzanne Wilson SW  
THROUGH: STAFF DIRECTOR ASP COMPLIANCE REVIEW Carroll Bowen CB/AS  
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

CANDIDATE/COMMITTEE: Ray Kogovsek for Congress  
TREASURER: Thomas E. Jagger  
ADDRESS: 127 First National Bank  
Pueblo, CO 81003  
AFFILIATE(S): n/a

ALLEGATION(S): Accepted excessive contribution from unregistered committee  
CITE: 2 U.S.C. 441(a)  
ATTACHMENT(S) 2

DATE INITIATED:

MANNER IN WHICH REVIEW WAS INITIATED:

- Normal Review
- Other:
- Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 4/1/78 TO 6/30/78

TOTAL RECEIPTS \$ 15,981 TOTAL EXPENDITURES \$ 14,952

CASH ON HAND \$ 11,456 DEBTS \$ 1,500

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

- A Surface Violation letter was mailed to the committee on 4/9/79. 3
- A response was received on 7/29/79, indicating a refund had been made; 5
- however, an RTB notification was sent in error on 6/8/79. 6
- The committee's July 10 report (received 9/14/79) itemized the refund. 7

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Penny Harms spoke with the treasurer on April 30, 1979. 4

REASON(S) FOR REFERRAL:

ATTACHMENT

The contribution, although refunded, exceeds the Commission threshold for review by OGC.

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

NONE

OTHER RELEVANT INFORMATION:

ATTACHMENT

not pertinent

SEE REFERRAL FOR COLORADO BUILDING AND CONSTRUCTION TRADES COUNCIL

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
RAY KOGOVSEK FOR CONGRESS								
	1977 STATEMENT OF ORGANIZATION					21NOV77	3	ID# C00082701
	REQUEST FOR ADDITIONAL INFORMATION					8DEC77	2	77HSE/127/1275
	1978 STATEMENT OF ORGANIZATION - AMENDMENT					31JAN78	3	77FEC/062/3359
	48 HOUR CONTRIBUTION NOTICE					31OCT78	1	78HSE/129/3884
	48 HOUR CONTRIBUTION NOTICE					2NOV78	1	78HSE/154/0065
	48 HOUR CONTRIBUTION NOTICE					2NOV78	1	78HSE/154/3713
	48 HOUR CONTRIBUTION NOTICE					6NOV78	1	78HSE/154/3822
	48 HOUR CONTRIBUTION NOTICE					8NOV78	1	78HSE/155/0025
	48 HOUR CONTRIBUTION NOTICE					8NOV78	1	78HSE/155/1308
	48 HOUR CONTRIBUTION NOTICE					13NOV78	1	78HSE/155/1850
	1977 OCTOBER 10 QUARTERLY	3,382		1,940		15APR77 -30SEP77	6	78HSE/130/0817
	OCTOBER 10 QUARTERLY - AMENDMENT					15APR77 -30AUG77	1	78HSE/129/3529
	OCTOBER 10 QUARTERLY - AMENDMENT	7,282		4,944		15APR77 -30SEP77	5	78HSE/146/0880
	YEAR END REPORT	11,496		6,261		1OCT77 -31DEC77	11	78HSE/129/3479
	REQUEST FOR ADDITIONAL INFORMATION					1OCT77 -31DEC77	3	78FEC/076/3941
	YEAR END REPORT - AMENDMENT					1OCT77 -31DEC77	6	78HSE/142/2087
	YEAR END REPORT - AMENDMENT	11,496		7,062		7OCT77 -31DEC77	3	78HSE/146/0877
	1978 APRIL 10 QUARTERLY	14,496		10,646		1JAN78 -31MAR78	10	78HSE/133/2352
	REQUEST FOR ADDITIONAL INFORMATION					1JAN78 -31MAR78	3	78FEC/076/3925
	APRIL 10 QUARTERLY - AMENDMENT					1JAN78 -31MAR78	3	78HSE/141/4044
	REQUEST FOR ADDITIONAL INFORMATION					1JAN78 -31MAR78	3	79FEC/116/5204
	APRIL 10 QUARTERLY - AMENDMENT					1JAN78 -31MAR78	1	79HSE/165/3422
	10 DAY PRE-PRIMARY	10,126		19,555		1JUL78 -28AUG78	15	78HSE/144/2870
	REQUEST FOR ADDITIONAL INFORMATION					1JUL78 -28AUG78	2	79FEC/134/3582
	10 DAY PRE-PRIMARY - AMENDMENT	17,126		26,133		1JUL78 -28AUG78	7	78HSE/146/0904
	REQUEST FOR ADDITIONAL INFORMATION					1JUL78 -28AUG78	5	78FEC/116/2894
	REQUEST FOR ADDITIONAL INFO 2ND					1JUL78 -28AUG78	2	79FEC/134/3584
	10 DAY PRE-PRIMARY - AMENDMENT					1JUL78 -28AUG78	2	79HSE/165/2919
	10 DAY PRE-PRIMARY - AMENDMENT					1JUL78 -28AUG78	4	79HSE/165/2927
	30 DAY POST-PRIMARY	0		101		1OCT78 -2OCT78	3	78HSE/150/2137
	JULY 10 QUARTERLY	15,981		14,952		1APR78 -30JUN78	13	78HSE/141/4053
	REQUEST FOR ADDITIONAL INFORMATION					1APR78 -30JUN78	3	78FEC/116/0456
	REQUEST FOR ADDITIONAL INFO 2ND					30JUN78	2	79FEC/134/0249
	REQUEST FOR ADDITIONAL INFORMATION					30JUN78	2	79FEC/123/1954
	JULY 10 QUARTERLY - AMENDMENT					1APR78 -30JUN78	6	79HSE/165/2921
	JULY 10 QUARTERLY - AMENDMENT					30JUN78	1	79HSE/165/3275
	OCTOBER 10 QUARTERLY		12,691		7,756	1SEP78 -30SEP78	17	78HSE/150/2237
	OCTOBER 10 QUARTERLY - AMENDMENT		15,227		12,635	2AUG78 -30SEP78	16	78HSE/159/3435
	REQUEST FOR ADDITIONAL INFORMATION					2AUG78 -30SEP78	3	79FEC/116/5200
	OCTOBER 10 QUARTERLY - AMENDMENT					2AUG78 -30SEP78	22	79HSE/165/3512
	10 DAY PRE-GENERAL		15,104		17,750	1OCT78 -23OCT78	15	78HSE/153/4073
	10 DAY PRE-GENERAL - AMENDMENT		15,105		17,852	1OCT78 -23OCT78	4	78HSE/159/3431
	30 DAY POST-GENERAL		24,124		25,857	2OCT78 -27NOV78	19	78HSE/159/3412
	REQUEST FOR ADDITIONAL INFORMATION					2OCT78 -27NOV78	3	79FEC/130/0307
	YEAR END REPORT		841		1,141	2NOV78 -31DEC78	5	79HSE/162/4864
	TOTAL	66,381	55,297	63,838	57,485		240	TOTAL PAGES

All Reports Reviewed

21 FEDERAL ELECTION COMMISSION  
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) 1979-1980

DATE 4DEC79  
 PAGE 148E

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
RAY KOGOVSEK FOR CONGRESS			9,460		9,448	1JAN79 -31MAR79		ID# C00082701
	1979 APRIL 10 QUARTERLY		13,155		12,806	1APR79 -30JUN79		9 79HSE/145/1002
	JULY 10 QUARTERLY							14 79HSE/148/1301
	TOTAL	0	22,615	0	22,254			23 TOTAL PAGES

All Reports Reviewed



In reply please refer to 45V1/78-165

Kogosvek  
5/9



FEDERAL ELECTION COMMISSION

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

9 April 1979

Thomas E. Jagger, Treasurer  
Ray Kogosvek for Congress  
127 First National Bank Building  
Pueblo, Colorado 81003

Dear Mr. Jagger:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the July 10 Quarterly Report of Receipts and Expenditures, we noticed an entry indicating that you may have received a contribution which exceeds the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

The Act precludes individuals and political committees, other than multicandidate committees, from making political contributions to a candidate for Federal election in excess of \$1,000 per election. The Act defines a multicandidate committee as one which has been registered for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office. The committee listed as the source of the contribution in question does not presently qualify as a multicandidate committee and we have notified them accordingly. We have recommended that the source committee notify you if it is confirmed that the contribution was in excess of the limits.

The Commission recommends that if you find the contribution you received was in excess of the limits set forth in the Act you return the amount in excess of \$1,000 to the donor. This return should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

81040300653

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Penny Harms (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4172.

Sincerely,

*Orlando B. Potter*

Orlando B. Potter  
Staff Director

Certified Mail  
Return Receipt Requested

81040300654

PS Form 3811, Apr. 1977

KECSVEK 45V. 176-165 PH

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse

1. The following service is requested (check one).  
 Show to whom and date delivered..... c  
 Show to whom, date, and address of delivery..... c  
 RESTRICTED DELIVERY  
 Show to whom and date delivered..... c  
 RESTRICTED DELIVERY  
 Show to whom, date, and address of delivery. \$.....  
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
 943252  
 (Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE  Addressee  Authorized agent

4. DATE OF DELIVERY: *April 13, 1979* POSTMARK  
 APR 13 1979  
 CLERK'S INITIALS

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

JACBER

☆GPO. 1977-0-249-595

MEMORANDUM: FOR FILE

RE: TELECON

FROM: Tom Jagger, Treasurer. to Penny Harms

DATE: April 30, 1979

NAME OF COMMITTEE: RAY KOGOVSEK FOR CONGRESS; CO/3

(303) 545-4412

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Mr. Jagger called about a surface violation letter they received on a/ excessive contribution from the Colo. Bldg. & Construction Trades Council. As far as we know, they are unregistered. Mr. Jagger said he has been trying to get in touch with the person on their committee who knew when the \$ came in and all the details, and that that person is now checking into the matter. He said it will probably take a couple more days, but he wanted to let us know they were looking into it. The SV letter was dated April 9. Mr. Jagger will be back in touch with us just as soon as they are able to find out anything. possible.

81010300655

MAY 25 1979  
REGULAR MAIL

LAW OFFICES OF  
THOMAS E. JAGGER  
SUITE 127  
FIRST NATIONAL BANK BUILDING  
FUEBLA, COLORADO 81603

RECEIVED  
FEDERAL ELECTION  
COMMISSION

MAY 29 PM 2:50

THOMAS E. JAGGER  
DAVID A. COLE  
JOHN G. BOONICK  
PAUL J. WILLIAMS

TELEPHONE  
303  
4412  
RECEIVED  
REGISTRATION  
MAY 30 AM 11:27  
U.S. HOUSE OF REPRESENTATIVES  
OFFICE OF CLERK

May 25, 1979

Ms. Penny Barnes  
Reports Analyst  
Federal Election Commission  
1325 K. Street N.W.  
Washington, D.C. 20463

Re: Ray Kogovsek for Congress  
Committee  
No. CO-072010

Dear Ms. Barnes:

After reviewing your letter of April 9, 1979 relating to receipt of contributions in excess of limits, we thoroughly reviewed the matter and are of the opinion that your interpretation is correct. The Committee has this date refunded \$3,000 in excess contributions to: Colorado Building & Construction Trades Council-Labor Registration Committee, 9 East Costilla, Colorado Springs, Colorado which was not a duly registered multicandidate committee.

Thank you very kindly for your cooperation in this matter.

Very truly yours,  
RAY KOGOVSEK FOR CONGRESS COMMITTEE

*Thomas E. Jagger*  
Thomas E. Jagger  
Treasurer

TEJ:sm

81040300656  
79011553275



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 8, 1979

7/8

Thomas E. Jagger, Treasurer  
Ray Kogosvek for Congress  
127 First National Bank  
Building  
Pueblo, CO 81003

Dear Mr. Jagger:

On April 9, 1979, you were notified that certain entries in the July 19 Quarterly Report of Receipts and Expenditures filed by your committee raised problems under 2 U.S.C. 441a.

As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 441a.

The Commission intends to take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact ~~Penny Harms~~, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202)523-4172.

*Beverly White*

Sincerely,

*Mar A. Friedewitz*  
Commissioner

Certified Mail:  
Return Receipt Requested

81040300657

81040300658

*EG 4512 17P-103PW King*

SENDER. Complete Items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).  
 Show to whom and date delivered..... c  
 Show to whom, date, and address of delivery..... c  
 RESTRICTED DELIVERY Show to whom and date delivered..... c  
 RESTRICTED DELIVERY Show to whom, date, and address of delivery. \$\_\_\_\_ (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
*T. JAGGER*

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.  
 | *43857* |

(Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE  Addressee  Authorized agent  
*K. Miller Medina*

DATE OF DELIVERY *6-11-79* POSTMARK  
*3025* JUN 11 1979

ADDRESS (Complete only if requested)

UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

FIRST CLASS MAIL PERMIT NO. 1077 WASHINGTON, D.C. 20540

*Jagger*





FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1150

Date Filmed 9/30/81 Camera No. --- 2

Cameraman JPC