



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20541

THIS IS THE END OF TCR # 1157

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FEDERAL ELECTION COMMISSION

Commissioner's handwritten
comment sheets re: objections

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

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 Murray

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	982636	

(Always obtain signature of addressee or agent.)

I have received the article described above.

SIGNATURE Addressee Authorized agent

T. Kubrick

4. DATE OF DELIVERY: *4/27/81* POSTAGE: _____

5. ADDRESS (Complete only if different from address on article)

6. UNABLE TO DELIVER OCCASION: _____

1157 *Murray*

APR 27 1981



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 21, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald F. Menagh, P.C.
Attorney at Law
386 Park Avenue South
New York, New York 10016

ATTENTION: Stuart Bochner

Re: MUR 1157 - New York City Central
Labor Council Individual Fund

Dear Mr. Menagh:

On April 4, 1979, the Commission found reason to believe that your client had violated 2 U.S.C. § 433 and § 434 by failing to timely register and report as a political committee. However, in that the forms you submitted presently comply with the requirements of sections 433 and 434, the Commission has determined to take no further action and close its file.

The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Carolyn Weeder at (202)523-4529.

Sincerely,

Charles N. Steele
General Counsel

81010295350



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald F. Menagh, P.C.
Attorney at Law
386 Park Avenue South
New York, New York 10016

ATTENTION: Stuart Bochner

Re: MUR 1157 - New York City Central
Labor Council Individual Fund

Dear Mr. Menagh:

On April 4, 1979, the Commission found reason to believe that your client had violated 2 U.S.C. § 433 and § 434 by failing to timely register and report as a political committee. However, in that the forms you submitted presently comply with the requirements of sections 433 and 434, the Commission has determined to take no further action and close its file.

The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Carolyn Weeder at (202)523-4529.

Sincerely,

Charles N. Steele
General Counsel

CS

81040295351

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
New York City Central Labor) MUR 1157
Council Individual Fund)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 21, 1981, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1157:

1. Take no further action with respect to the New York City Central Labor Council Individual Fund's violation of 2 U.S.C. § 433 and § 434 by failing to timely register and report as a political committee.
2. Close the file in this matter.
3. Approve and send the letter as attached to the General Counsel's April 16, 1981 report.

Attest:

4/21/81
Date

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

Received in Office of the Commission Secretary: 4-16-81, 5:48
Circulated on 48 hour vote basis: 4-17-81, 2:00

81040295352

April 16, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1157

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

81040295353

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

April 16, 1981

In the Matter of)
)
New York City Central Labor)
Council Individual Fund)

MUR 1157

81 APR 16 P 5: 48

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

GENERAL COUNSEL'S REPORT

I. Background

On April 4, 1979, the Commission found reason to believe that the New York City Central Labor Council Individual Fund (the "Individual Fund") violated 2 U.S.C. § 433 and § 434 by failing to timely register and report as a political committee. On May 17, 1979, the Individual Fund submitted its statement of organization and reports of receipts and expenditures pursuant to 2 U.S.C. § 433 and § 434. The statement of organization, however, was not complete in that it failed to reflect the Individual Fund's relationship to the AFL-CIO Committee on Political Education Contributions Committee (AFL-CIO COPE PCC), as required by section 433.

The Office of General Counsel therefore sent a letter to the Individual Fund requesting that it amend the form to reflect the relationship. On March 23, 1981, the Individual Fund submitted an amended statement of organization which states that it is affiliated with the AFL-CIO COPE PCC (Attachment 1).

II. Legal Analysis

In view of the fact that the forms submitted by the Individual Fund presently comply with 2 U.S.C. § 433 and § 434, the Office

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of General Counsel recommends that the Commission take no further action in this matter.

III. Recommendations

1. Take no further action with respect to the New York City Central Labor Council Individual Fund's violation of 2 U.S.C. § 433 and § 434 by failing to timely register and report as a political committee.

2. Close the file in this matter.

3. Approve and send the attached letter.

Attachments

- 1. Amended Statement of Organization
- 2. Letter to Respondent's Counsel

16 April 1981
Date



Charles N. Steele
General Counsel

81040295355

Chick
4/8/84

2

STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (In Full) <input type="checkbox"/> Check if name or address is changed. New York City Central Labor Council	2. Date March 23, 1981
(b) Address (Number and Street) 386 Park Avenue South	3. FEC Identification Number MUR 1157
(c) City, State and ZIP Code New York, New York 10016	4. Is this an amended Statement? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

5. TYPE OF COMMITTEE (check one):

(a) This committee is a principal campaign committee. (Complete the candidate information below.)

(b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District
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(c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)

(d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)

(e) This committee is a separate segregated fund.

(f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
AFL-CIO COPE PCC	Washington, D. C.	Affiliated

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

Corporation Corporation w/o Capital Stock Labor Organization Membership Organization Trade Association Cooperative

8. Custodian of Records: Identify by name, address (phone number - optional) and position, the person in possession of committee books and records.

Full Name	Mailing Address and ZIP Code	Title or Position
Harry Avrutin	386 Park Avenue South New York, New York 10016	Treasurer

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

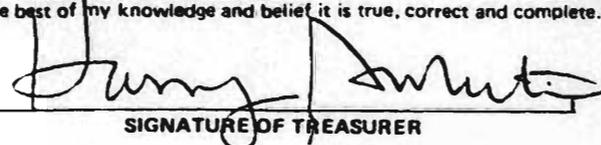
Full Name	Mailing Address and ZIP Code	Title or Position
Harry Avrutin	386 Park Avenue South New York, New York 10016	Treasurer

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Manufacturers Hanover Trust	386 Park Avenue South New York, New York 10016

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

Harry Avrutin
Type or Print Name of Treasurer


SIGNATURE OF TREASURER

4/9/81
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.

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

										FEC FORM 1 (3/80)
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Attachment 1



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald F. Menagh, P.C.
Attorney at Law
386 Park Avenue South
New York, New York 10016

ATTENTION: Stuart Bochner

Re: MUR 1157 - New York City Central
Labor Council Individual Fund

Dear Mr. Menagh:

On April 4, 1979, the Commission found reason to believe that your client had violated 2 U.S.C. § 433 and § 434 by failing to timely register and report as a political committee. However, in that the forms you submitted presently comply with the requirements of sections 433 and 434, the Commission has determined to take no further action and close its file.

The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to Carolyn Weeder at (202)523-4529.

Sincerely,

Charles N. Steele
General Counsel

Attachment 2

81040295357

February 9, 1981

MEMORANDUM TO: Marjorie W. Emons
FROM: Elissa T. Garr
SUBJECT: MUR 1157

Please have the attached Interim InvestReport
distributed to the Commission. Thank you.

81040295359

BEFORE THE FEDERAL ELECTION COMMISSION

January 28, 1981

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
FEB 9 P 1: 38

In the Matter of)
)
New York City Central Labor)
Council Individual Fund)

MUR 1157

INTERIM INVESTIGATIVE REPORT #4

On April 4, 1979 the Commission found reason to believe that the New York City Central Labor Council Individual Fund (the "Individual Fund") violated 2 U.S.C. § 433 and § 434 by failing to timely register and report as a political committee. On May 17, 1979 the Individual Fund submitted its statement of organization and reports of receipts and expenditures pursuant to 2 U.S.C. § 433 and § 434. The submissions, however, were not complete. The Commission therefore sent a letter to the Individual Fund requesting additional information.

On May 27, 1980 the Individual Fund submitted the information required by section 434, however, it failed to amend its statement of organization to reflect its relationship to the AFL-CIO Committee on Political Education Contributions Committee (AFL-CIO COPE PCC), as required by section 433.

Thus, on September 17, 1980, the Commission sent an additional letter to the Individual Fund explaining the requirement of reporting the AFL-CIO COPE PCC as an affiliated committee.

On December 4, 1980, the Individual Fund submitted a response stating that it considers itself a "related organization" to the AFL-CIO COPE PCC and questioned whether this statement is

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sufficient to serve as an amendment to the statement of organization. In that the Individual Fund did not specifically state that it is an "affiliated committee" to the AFL-CIO COPE PCC, as required by statute, the Office of General Counsel sent a letter to the Individual Fund requesting that it formally amend its statement of organization such that it clearly and specifically states that the Individual Fund is an affiliated committee of the AFL-CIO COPE PCC.

The General Counsel's Office will prepare a further report upon receipt of the formal amendment from the Individual Fund.

6 Feb 1981
Date



Charles N. Steele
General Counsel

81010295361



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 3, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald F. Menagh
130 East 40th Street
New York, New York 10016

ATTENTION: Stuart Bochner

Re: MUR 1157 - New York City
Central Labor Council
Individual Fund

Dear Mr. Menagh:

The Commission received your letter of December 4, 1980 regarding the relationship of the New York City Central Labor Council Individual Fund (the "Individual Fund") to the AFL-CIO Committee on Political Education Political Contributions Committee (AFL-CIO COPE PCC). In your letter you ask whether your statement that "the Individual Fund is a 'related organization' to the COPE Committee" is sufficient to serve as an amendment or whether the Commission requires a formal amendment to the Individual Fund's statement of organization.

In response to your question, the Office of General Counsel requests that you formally amend the Individual Fund's statement of organization by marking "Yes" on Item 4 of the enclosed form and by specifically stating that the AFL-CIO COPE PCC is an affiliated committee on Item 6 of the form. As is evident, it is also necessary to complete Items 1, 2 and 3 of the form.

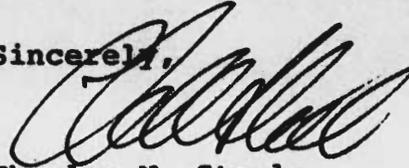
In addition, in light of the fact that the Individual Fund is affiliated to the AFL-CIO COPE PCC, the Commission reminds you that the Individual Fund, the AFL-CIO COPE PCC and all other affiliated committees are collectively subject to the contribution limitations set forth by 2 U.S.C. § 441a (a)(2).

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Donald F. Menagh
Page Two

Your expeditious return of this form will be appreciated.
A self-addressed envelope is also enclosed for your convenience.
If you have any questions, please contact Carolyn Weeder at (202)
523-4529.

Sincerely,



Charles N. Steele
General Counsel

Enclosures

1. Statement of Organization Form
2. Self-Addressed Envelope

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald F. Menagh
130 East 40th Street
New York, New York 10016

ATTENTION: Stuart Bochner

Re: MUR 1157 - New York City
Central Labor Council
Individual Fund

Dear Mr. Menagh:

The Commission received your letter of December 4, 1980 regarding the relationship of the New York City Central Labor Council Individual Fund (the "Individual Fund") to the AFL-CIO Committee on Political Education Political Contributions Committee (AFL-CIO COPE PCC). In your letter you ask whether your statement that "the Individual Fund is a 'related organization' to the COPE Committee" is sufficient to serve as an amendment or whether the Commission requires a formal amendment to the Individual Fund's statement of organization.

In response to your question, the Office of General Counsel requests that you formally amend the Individual Fund's statement of organization by marking "Yes" on Item 4 of the enclosed form and by specifically stating that the AFL-CIO COPE PCC is an affiliated committee on Item 6 of the form. As is evident, it is also necessary to complete Items 1, 2 and 3 of the form.

In addition, in light of the fact that the Individual Fund is affiliated to the AFL-CIO COPE PCC, the Commission reminds you that the Individual Fund, the AFL-CIO COPE PCC and all other affiliated committees are collectively subject to the contribution limitations set forth by 2 U.S.C. § 441a (a)(2).

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Donald F. Menagh
Page Two

Your expeditious return of this form will be appreciated.
A self-addressed envelope is also enclosed for your convenience.
If you have any questions, please contact Carolyn Weeder at
(202)523-4529.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

1. Statement of Organization Form
2. Self-Addressed Envelope

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DONALD F. MENAGH, P.C.
ATTORNEY AT LAW
130 EAST 40TH STREET
NEW YORK, N. Y. 10016
(212) 533-3880

December 4, 1980

Federal Election Commission
325 K Street, NW
Washington, D. C. 20463

Attention: Carolyn Weider

Re: New York City Central Labor Council
Individual Fund

Dear Miss Weider:

During the course of our conversation last week, I indicated to you that I was awaiting a response from AFL-CIO concerning their position regarding the "related committee" status of the above referenced Committee to the AFL-CIO COPE Committee. I have now received the opinion of the AFL-CIO and am in a position to do whatever is necessary to conform the Individual Fund's status to your requirements.

In this regard, I can state on behalf of the Individual Fund that the Individual Fund is a "related organization" to the COPE Committee. Is this statement sufficient to satisfy your needs or do you require a formal amendment to the organizational statement. If you require the latter, please let me know and I will see to its completion.

If you have any further requests, please let me know.

Very truly yours,
DONALD F. MENAGH

By: Stuart Bochner
Stuart Bochner

SB:tk

81040295366

MEUASH, TRAINOR, ROTHFELD & BOCHNER
130 EAST 40TH STREET
NEW YORK, N. Y. 10018



Federal Election Commission
325 K Street, NW
Washington, D. C. 20463

Attn.: Carolyn Weider

01040295367

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RECORDED



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS/MARGARET CHANEY
DATE: NOVEMBER 28, 1980
SUBJECT: MUR 1157 - Interim Investigative Report #3,
dated 11-25-80; Received in OCS 11-26-80,
10:44

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 4:00, November 26, 1980.

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

81040295360

November 25, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1157

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

81040295369

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

November 25, 1980

80 NOV 26 AIO: 44

In the Matter of)
New York City Central Labor) MUR 1157
Council Individual Fund)

INTERIM INVESTIGATIVE REPORT #3

The Reports Analysis Division referred to the Office of General Counsel the matter in which the New York City Central Labor Council Individual Fund (the "Individual Fund") violated 2 U.S.C. § 433 and § 434 by failing to timely register and report as a political committee. The Individual Fund submitted a statement of organization and filed a report of receipts and expenditures in May, 1979. On April 28, 1980, the Commission sent a letter to the Individual Fund requesting submission of specific information which had been omitted from the reports.

The Individual Fund responded to the request for additional information, however, it failed to amend its statement of organization to reflect its relationship to the AFL-CIO COPE PCC as required. The Commission, therefore, sent a letter to the Individual Fund explaining the requirement of reporting the AFL-CIO COPE PCC as an affiliated committee.

To date, the Individual Fund has not submitted a written response to the latest mailing. However, on October 9, 1980, Mr. Stuart Bochner, an attorney of the firm representing the Individual Fund, telephoned to state that a response is in the process of being approved by the AFL-CIO Headquarters.

On November 20, 1980, Mr. Bochner telephoned again to

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apologize for the delay in the transmittal of the response. He explained that the delay was due to the Headquarters' failure to approve the response in a timely fashion. Mr. Bochner did state, however, that the response will amend the Individual Fund's statement of organization to reflect the AFL-CIO COPE PCC as an affiliated committee.

Mr. Bochner stated that he will forward the response to the Commission as soon as he receives formal approval from the AFL-CIO Headquarters. The Office of General Counsel will prepare a report upon receipt of the response.

11/25/80

Date



Kenneth A. Gross
Associate General Counsel

81040295371



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MWE*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *m*
DATE: OCTOBER 16, 1980
SUBJECT: MUR 1157 - Interim Investigative Report #2
dated 10-10-80, signed 10-14-80, received
in OCS on 10-14-80, 5:01

The above-named document was circulated to the Commission on a no-objection basis at 11:00 a.m. on 10-15-80.

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

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RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

80 OCT 14 5:01

October 10, 1980

In the Matter of)
New York Central Labor) MUR 1157
Council Individual Fund)

INTERIM INVESTIGATIVE REPORT #2

The Reports Analysis Division referred to the Office of General Counsel the matter in which the New York City Central Labor Council Individual Fund (the "Individual Fund") violated 2 U.S.C. § 433 and § 434 by failing to timely register and report as a political committee. The Individual Fund submitted a statement of organization and filed a report of receipts and expenditures in May, 1979. On April 28 1980, the Commission sent a letter to the Individual Fund requesting submission of specific information which had been omitted from the reports.

The Individual Fund responded to the request for additional information, however, it failed to amend its statement of organization to reflect its relationship to the AFL-CIO COPE PCC, as required. The Commission, therefore, sent a letter to the Individual Fund explaining the requirement of reporting the AFL-CIO COPE PCC as an affiliated committee.

To date, the Individual Fund has not submitted a written response to the latest mailing. However, on October 9, 1980, Mr. Stuart Bochner, an attorney of the firm representing the Individual Fund,

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(MUR 1157-Interim Investigative Report #2)

-2-

telephoned to state that a response is in the process of being approved which should be received by the Commission the week of October 14, 1980. The General Counsel's Office will submit a further report upon receiving this response.

14 October 1980
Date


Charles N. Steele
General Counsel

81040295374

October 14, 1980

MEMORANDUM TO: Marjorie W. Emons
FROM: Elissa T. Garr
SUBJECT: MUR 1157

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 17, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald F. Menagh, P.C.
Attorney at Law
130 East 40th Street
New York, New York 10016

Re: MUR 1157
New York City Central Labor
Council Individual Fund

Dear Mr. Menagh:

This is to acknowledge the Commission's receipt of your letter of May 27, 1980, regarding MUR 1157. In your letter, you state that you do not view the New York City Central Labor Council Individual Fund (the "Individual Fund") to be affiliated with the AFL-CIO Committee on Political Education Political Contributions Committee (the "AFL-CIO COPE PCC").

Specifically, you contend that the Individual Fund "is not an organization which has been established, financed, maintained or controlled by the AFL-CIO COPE PCC" and that the Individual Fund "itself is not a subsidiary, branch, division, department or local unit of the AFL-CIO." Thus, you do not view it necessary to amend the Individual Fund's statement of organization to reflect this relationship.

However, as the enclosed diagram of the structural organization of the AFL-CIO illustrates, the New York City Central Labor Council is a local central body of the AFL-CIO, represented schematically by the box in the lower right hand corner. These local central bodies are associated with the state central bodies as well as with the national and international organization.

Therefore, given the fact that the Individual Fund is a separate segregated fund of the New York City Central Labor Council, the Individual Fund is affiliated with the AFL-CIO COPE PCC, the separate segregated fund of the international organization.*/

*/ Additionally, Judge Richey of the D.C. District Court has stated by way of dicta that the AFL-CIO and its local committees are automatically treated as one PAC and proof of control is unnecessary. Walther v. FEC, CCH Federal Election Campaign Financing Guide ¶9076, at 50,638 (D.D.C. 1979).

81040295376



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald F. Menagh, P.C.
Attorney at Law
130 East 40th Street
New York, New York 10016

Re: MUR 1157
New York City Central Labor
Council Individual Fund

Dear Mr. Menagh:

This is to acknowledge the Commission's receipt of your letter of May 27, 1980, regarding MUR 1157. In your letter, you state that you do not view the New York City Central Labor Council Individual Fund (the "Individual Fund") to be affiliated with the AFL-CIO Committee on Political Education Political Contributions Committee (the "AFL-CIO COPE PCC").

Specifically, you contend that the Individual Fund "is not an organization which has been established, financed, maintained or controlled by the AFL-CIO COPE PCC" and that the Individual Fund "itself is not a subsidiary, branch, division, department or local unit of the AFL-CIO." Thus, you do not view it necessary to amend the Individual Fund's statement of organization to reflect this relationship.

However, as the enclosed diagram of the structural organization of the AFL-CIO illustrates, the New York City Central Labor Council is a local central body of the AFL-CIO, represented schematically by the box in the lower right hand corner. These local central bodies are associated with the state central bodies as well as with the national and international organization.

Therefore, given the fact that the Individual Fund is a separate segregated fund of the New York City Central Labor Council, the Individual Fund is affiliated with the AFL-CIO COPE PCC, the separate segregated fund of the international organization.*/
* /

* / Additionally, Judge Richey of the D.C. District Court has stated by way of dicta that the AFL-CIO and its local committees are automatically treated as one PAC and proof of control is unnecessary. Walther v. FEC, CCH Federal Election Campaign Financing Guide ¶9076, at 50,638 (D.D.C. 1979).

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Further, 11 C.F.R. § 102.2(b)(1)(ii)(B) requires that political committees established by state or local units to disclose the name and address of each political committee established by their national or international unions. Thus, the regulations require the Individual Fund to report the AFL-CIO COPE PCC as an affiliated committee.

The Commission therefore requests that within ten (10) days of your receipt of this letter the Individual Fund amend its statement of organization to reflect that the AFL-CIO COPE PCC is an affiliated committee. Additionally, the Commission reminds you that the Individual Fund and all other affiliated committees, including the AFL-CIO COPE PCC, are considered as one single political committee for purposes of the contribution limitations prescribed by 2 U.S.C. § 441a(a)(2).

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

Sincerely,

Charles N. Steele
General Counsel

ckw

81040295379

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
New York City Central Labor)
Council Individual Fund)

MUR 1157

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission's executive session on September 9, 1980, do hereby certify that the Commission decided by a vote of 6-0 to send to Mr. Donald Menagh, counsel for the New York City Central Labor Council Individual Fund the letter attached to the General Counsel's August 29, 1980 report on MUR 1157.

Attest:

9/9/80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

81040295380

August 29, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Jane Colgrove
SUBJECT: MUR 1157

Please have the attached General Counsel's Report on
MUR 1157 distributed to the Commission on a 48 hour tally
basis.

Thank you.

81040295381

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
New York City Central Labor) MUR 1157
Council Individual Fund)

GENERAL COUNSEL'S REPORT

80 AUG 29 P 1: 59
RECEIVED
OFFICE OF THE
COMPTROLLER CLERK

I. BACKGROUND

The Reports Analysis Division referred to the Office of General Counsel the matter in which the New York City Central Labor Council Individual Fund (the "Individual Fund") violated 2 U.S.C. § 433 and § 434 by failing to timely register and report as a political committee. The Individual Fund submitted a statement of organization and filed a report of receipts and expenditures in May 1979, however the Individual Fund omitted specific information on its reports. Therefore the Commission approved sending a letter to the Individual Fund on April 28, 1980, requesting submission of the required information. On May 27, 1980, the Individual Fund submitted a response to the Commission's letter. A discussion of the submission follows:

II. LEGAL ANALYSIS

In its letter of April 28, 1980, the Commission requested that the Individual Fund respond to three RFAs which RAD had sent in July, October and December 1979 regarding certain

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disclosure and reporting omissions. Specifically, the omissions are a) failure to notarize an independent expenditure; b) failure to disclose source(s) of cash on hand; and c) failure to note the international AFL-CIO Committee on Political Education Political Contributions Committee ("AFL-CIO COPE PCC"), as an affiliated committee. 1/

In its response (Attachment A), the Individual Fund submitted the required information regarding omissions (a) and (b). However the Individual Fund did not view it necessary to amend its statement of organization with respect to omission (c) in that it does not consider itself to be affiliated with AFL-CIO COPE PCC.

In arguing its position, the Individual Fund contends that it is "not an organization which has been established, financed, maintained or controlled" by the AFL-CIO COPE PCC and that it "is not a subsidiary, branch, division, department or local unit of the AFL-CIO." Thus, the Individual Fund feels it should not reflect this relationship on its statement of organization.

However, as the attached diagram of the structural organization of the AFL-CIO illustrates (Attachment 2), the New York City Central Labor Council is a local central body of the AFL-CIO, represented schematically by the box in the

1/ The Individual Fund only lists the New York City Central Labor Council AFL-CIO as its connected organization.

81040295303

lower right hand corner. These local central bodies are associated with the state central bodies as well as with the national and international organization.

Therefore, given the fact that the Individual Fund is the separate segregated fund of the New York City Central Labor Council, the Individual Fund is affiliated with the AFL-CIO COPE PCC, the separate segregated fund of the international organization. 2/ Thus, the Individual Fund, the AFL-CIO COPE PCC as well as all other committees which are affiliated with the AFL-CIO COPE PCC are considered as one single political committee for purposes of the contribution limitations prescribed by 2 U.S.C. § 441a(a)(2).

Further, 11 C.F.R. § 102.2(b)(1)(ii)(B) requires that political committees established by State or local units to disclose the name and address of each political committee established by their national or international unions. Thus, the regulations require the Individual Fund to report the AFL-CIO COPE PCC as an affiliated committee.

The response received from the Individual Fund's counsel reveals that he does not share this understanding of the structural organization of the AFL-CIO. Although counsel acknowledges that the New York City Central Labor Council

2/ Additionally, Judge Richey of the D.C. District Court has stated by way of dicta that the AFL-CIO and its local committees are automatically treated as one PAC and proof of control is unnecessary. Walther v. FEC, CCH Federal Election Campaign Financing Guide ¶9076, at 50, 638 (D.D.C. 1979).

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is a member of the AFL-CIO, he is apparently unaware that the Individual Fund is in fact affiliated with the AFL-CIO COPE PCC. The Office of General Counsel therefore recommends that the Commission approve and send a letter to the Individual Fund explaining the requirement of the Individual Fund to list the AFL-CIO COPE PCC as an affiliated committee (Attachment 3).

III. RECOMMENDATION

1. Approve and send the attached letter to Mr. Donald Menagh, counsel for the New York City Central Labor Council Individual Fund.

29 August 1980
Date



Charles N. Steele
General Counsel

Attachments

- 1 - Respondent's Submission
- 2 - Chart of the Structural Organization of the AFL-CIO
- 3 - Letter to Respondent's Counsel

81040295305

RECEIVED
@CC #1507
80 MAY 30 AM 11:12

GENERAL COUNSEL
DONALD F. MENABH, P.C.
ATTORNEY AT LAW
130 EAST 40TH STREET
NEW YORK, N. Y. 10016
(212) 533-3880

Weeder

00 MAY 30 P 1:19

May 27, 1980

Federal Election Commission
Washington, D. C. 20463

908236

Attn.: Charles N. Steele
General Counsel

RE: MUR 1157
New York City Central Labor Council
Individual Fund

Dear Mr. Steele:

This is in response to your letter of April 30, 1980 concerning the above referenced Fund.

Please be advised that the following facts and circumstances are applicable to the three items for which you requested additional information in your letter:

1. The New York City Central Labor Council Individual Fund does not bear the required relationship to the AFL-CIO COPE PCC so as to qualify as either an "affiliated committee" or a "connected committee". The New York City Central Labor Council is not an organization which has been established, financed, maintained or controlled by the AFL-CIO COPE PCC. Indeed the New York City Central Labor Council itself is not a subsidiary, branch, division, department or local unit of the AFL-CIO. Rather, it is an organization of participating labor organizations within the New York City area which are themselves affiliated with the AFL-CIO. The New York City Central Labor Council acts as a clearing house and repository for participating unions.

81040295386

ATTACHMENT 1

RECEIVED

80 MAY 30 AM 11:12

-2-

Federal Election Commission:

May 27, 1980

2. The source of the cash on hand at the beginning of the reporting period for the Fund - funds remaining in this organization as a result of prior fund raising activity which predated the application of the Act. These funds were received from individual contributions over the course of many years of political contributions and receipts.

3. The expenditures itemized for Line 23 of FEC Form 3 were not, as your letter indicated, notarized. I will forward to your office another executed copy of this form, sworn to and witnessed by a Notary.

If I can be of any further assistance in this matter, please let me know.

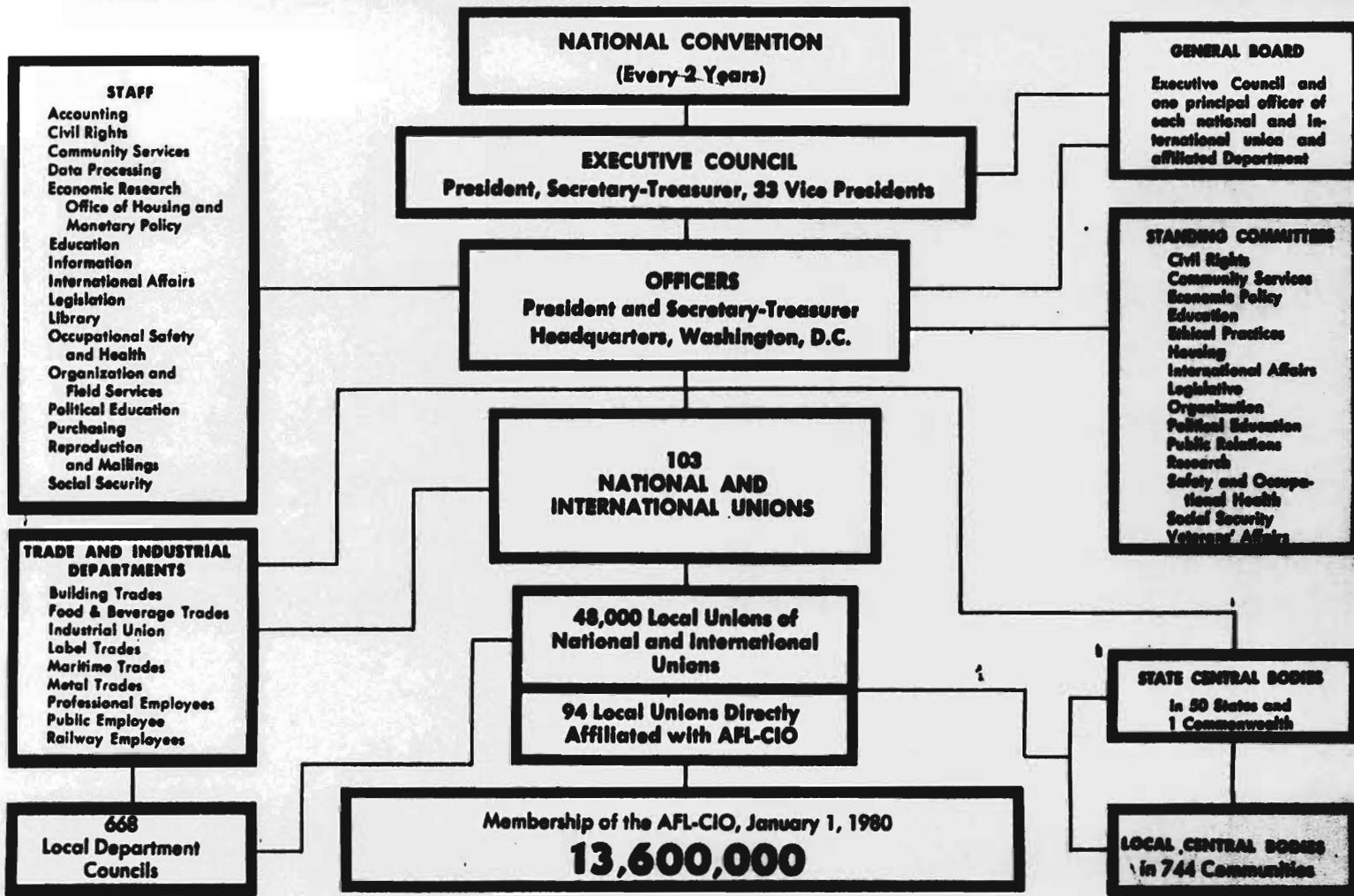
Very truly yours,

Donald F. Menagh
Donald F. Menagh

DFM/er

81040295387

STRUCTURAL ORGANIZATION of the AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS



ATTACHMENT 2





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Donald F. Menagh, P.C.
Attorney at Law
130 East 40th Street
New York, New York 10016

RE: MUR 1157
New York City Central Labor
Council Individual Fund

Dear Mr. Menagh:

This is to acknowledge the Commission's receipt of your letter of May 27, 1980, regarding MUR 1157. In your letter, you state that you do not view the New York City Central Labor Council Individual Fund (the "Individual Fund") to be affiliated with the AFL-CIO Committee on Political Education Political Contributions Committee (the "AFL-CIO COPE PCC").

Specifically, you contend that the Individual Fund "is not an organization which has been established, financed, maintained or controlled by the AFL-CIO COPE PCC" and that the Individual Fund "itself is not a subsidiary, branch, division, department or local unit of the AFL-CIO." Thus, you do not view it necessary to amend the Individual Fund's statement of organization to reflect this relationship.

However, as the enclosed diagram of the structural organization of the AFL-CIO illustrates, the New York City Central Labor Council is a local central body of the AFL-CIO, represented schematically by the box in the lower right hand corner. These local central bodies are associated with the state central bodies as well as with the national and international organization.

Therefore, given the fact that the Individual Fund is a separate segregated fund of the New York City Central Labor Council, the Individual Fund is affiliated with the AFL-CIO COPE PCC, the separate segregated fund of the international organization. 2/

2/ Additionally, Judge Richey of the D.C. District Court has stated by way of dicta that the AFL-CIO and its local committees are automatically treated as one PAC and proof of control is unnecessary. Walther v. FEC, CCH Federal Election Campaign Financing Guide ¶9076, at 50, 638 (D.D.C. 1979).

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Further, 11 C.F.R. § 102.2(b)(1)(ii)(B) requires that political committees established by state or local units to disclose the name and address of each political committee established by their national or international unions. Thus, the regulations require the Individual Fund to report the AFL-CIO COPE PCC as an affiliated committee.

The Commission therefore requests that within ten (10) days of your receipt of this letter the Individual Fund amend its statement of organization to reflect that the AFL-CIO COPE PCC is an affiliated committee. Additionally, the Commission reminds you that the Individual Fund and all other affiliated committees, including the AFL-CIO COPE PCC, are considered as one single political committee for purposes of the contribution limitations prescribed by 2 U.S.C. § 441a(a)(2).

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

Sincerely,

Charles N. Steele
General Counsel

81040295390

June 2, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Jane Colgrove
SUBJECT: MUR 1157

Please have the attached Interim Investigative Report on MUR 1157 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

81040295391

BEFORE THE FEDERAL ELECTION COMMISSION

May , 1980

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 JUN 2 AM: 02

In the Matter of)
)
New York City Central)
Labor Council Individual)
Fund)

MUR 1157

INTERIM INVESTIGATIVE REPORT #1

On April 12, 1979 the Commission found reason to believe that the New York City Central Labor Council Individual Fund ("the Individual Fund") violated 2 U.S.C. §433 and §434 by failing to timely register and report as a political committee. The Individual Fund submitted a statement of organization and filed a report of receipts and expenditures in May 1979, however, the Individual Fund omitted specific information in its reports. On April 28, 1980 the Commission therefore approved sending a letter to the Individual Fund requesting submission of the required information. On May 19, 1980 counsel for respondent telephoned to inform the General Counsel's Office that he is preparing a response which the Commission should be receiving shortly. The General Counsel's Office will prepare a further report upon receipt of the submission.

81040295392

30 May 1980
Date


Charles N. Steele
General Counsel

RECEIVED
GENERAL COUNSEL
DENALD F. MENASH, P.C.

RECEIVED
@cc#1507
'80 MAY 30 AM 11:12

00 MAY 30 P 1:10
ATTORNEY AT LAW
130 EAST 40TH STREET
NEW YORK, N. Y. 10016
(212) 533-3850

May 27, 1980

Federal Election Commission
Washington, D. C. 20463

908236

Attn.: Charles N. Steele
General Counsel

RE: MUR 1157
New York City Central Labor Council
Individual Fund

Dear Mr. Steele:

This is in response to your letter of
April 30, 1980 concerning the above referenced Fund.

Please be advised that the following facts
and circumstances are applicable to the three items
for which you requested additional information in
your letter:

1. The New York City Central Labor Council Individual
Fund does not bear the required relationship to the
AFL-CIO COPE PCC so as to qualify as either an
"affiliated committee" or a "connected committee".
The New York City Central Labor Council is not an
organization which has been established, financed,
maintained or controlled by the AFL-CIO COPE PCC.
Indeed the New York City Central Labor Council itself
is not a subsidiary, branch, division, department or
local unit of the AFL-CIO. Rather, it is an organi-
zation of participating labor organizations within
the New York City area which are themselves affilia-
ted with the AFL-CIO. The New York City Central
Labor Council acts as a clearing house and repository
for participating unions.

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'80 MAY 30 AM 11:12

-2-

Federal Election Commission:

May 27, 1980

2. The source of the cash on hand at the beginning of the reporting period for the Fund - funds remaining in this organization as a result of prior fund raising activity which predated the application of the Act. These funds were received from individual contributions over the course of many years of political contributions and receipts.

3. The expenditures itemized for Line 23 of FEC Form 3 were not, as your letter indicated, notarized. I will forward to your office another executed copy of this form, sworn to and witnessed by a Notary.

If I can be of any further assistance in this matter, please let me know.

Very truly yours,

Donald F. Menagh
Donald F. Menagh

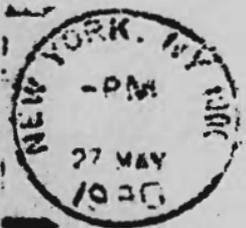
DFM/er

81040295394

DONALD F. MENAGH, P.C.

130 EAST 40TH STREET

NEW YORK, N. Y. 10016



Federal Election Commission

Washington, D. C. 20463

Attn.: Charles N. Steele

Counsel

121211 MW 0627100

RECEIVED



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 30, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Donald F. Menagh, P.C.
130 East 40th Street
New York, New York 10016

Re: MUR 1157
New York City Central
Labor Council Individual
Fund

Dear Mr. Menagh:

On April 4, 1979 the Federal Election Commission ("the Commission") notified your client the New York City Central Labor Council Individual Fund of a reason to believe finding that your client violated the Federal Election Campaign Act of 1971, as amended ("the Act"), specifically 2 U.S.C. § 433 and § 434 for failure to file a statement of organization and to file required reports of receipts and expenditures.

On May 21, 1979, your client submitted the required statement of organization and reporting forms. However, the Commission notified you on three occasions (July 23, 1979, October 19, 1979, and December 19, 1979) that the submissions were insufficient. Specifically, the Commission requested additional information regarding the following reporting and disclosure omissions:

- 1) failure to note the international AFL-CIO COPE PCC, as opposed to the New York City Central Labor Council AFL-CIO, as its affiliated committee;
 - 2) failure to notarize an independent expenditure;
- and,
- 3) failure to disclose source(s) of cash on hand.

Copies of the requests are enclosed.

81040295396

To date, we have received no written response from you in connection with the requests for additional information. Please submit the requested information within 10 days of your receipt of this letter. If you fail to respond, the Office of General Counsel will proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

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, contact Carolyn Weeder, the staff member assigned to this matter at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

Procedures

Copies of Requests for Additional Information

81040295397

PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, SIGNED AND CERTIFIED MAIL

1. The following service is requested (check appropriate box):
 Show to whom and date delivered
 RESTRICTED DELIVERY
 RESTRICTED DELIVERY
 Show to whom, date, and address of recipient (CONSULT POSTMASTER FOR DETAILS)

2. ARTICLE: *Mr. Donald Menagh*
130 East 10th St
New York, New York

3. ARTICLE: *REGISTERED MAIL*
 REGISTERED NO. *041606*
 CERTIFIED NO. *041606*

4. I have received the article described above (check appropriate box):
 Signature Address

5. DATE OF DELIVERY: *5/8/80*

6. ADDRESS (Complete any if necessary):

1157

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1157
New York City Central Labor)
Council Individual Fund)

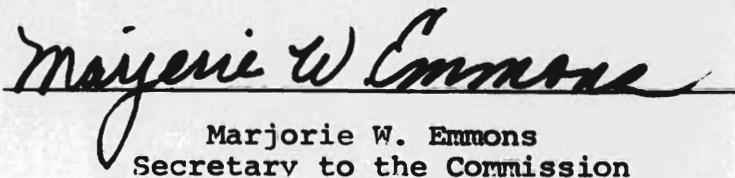
CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 28, 1980, the Commission approved by a vote of 6-0 sending the letter, as attached to the First General Counsel's Report dated April 24, 1980, to the New York City Central Labor Council Individual Fund.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

4/29/80
Date


Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 4-24-80, 10:04
Circulated on 48 hour vote basis: 4-24-80, 4:00

81040295398

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 4-24-80

80 APR 24 11 10 AM '80
STAFF MEMBER(S) 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: New York City Central Labor Council Individual Fund

RELEVANT STATUTE: 2 U.S.C. § 433, § 434

INTERNAL REPORTS CHECKED: FEC Reports filed by: New York City Central Labor Council Individual Fund, Citizens for a Responsive Congress; Sections 3 and 5 of "G" Index for Citizens for a Responsive Congress Committee.

FEDERAL AGENCIES CHECKED: NONE

GENERATION OF MATTER

The Reports Analysis Division (RAD) referred to the Office of General Counsel the matter in which the New York City Central Labor Council Individual Fund (the "Individual Fund"), formerly named the New York City Central Labor Council COPE Committee, an affiliated committee of the AFL-CIO COPE PCC, violated 2 U.S.C. § 433 and § 434 by failing to timely register and report as a political committee.

During the course of normal review, RAD disclosed that the Individual Fund made a contribution of \$2,000 on January 12, 1978 to the Citizens for a Responsive Congress, Senator Robert Garcia's principal campaign committee.

The Citizens for a Responsive Congress Committee returned the \$2,000 contribution to the Individual Fund on January 31, 1978. The Individual Fund subsequently made another contribution of \$2,000 to the same committee on February 6, 1978. The reason for the initial refund is unclear.^{1/}

^{1/} Respondent's counsel has stated that the reason for the refund was to "insure that the check was directed to the proper committee, and to more accurately reflect the source of the contribution" (RAD referral, page 8). Yet, the second check was made to the same committee; and, as far as investigation reveals, the second check did not reveal any further information as to the source of the contribution.

On December 11, 1978 RAD sent the Individual Fund a surface violation letter advising them that they may be considered as a political committee subject to the registration and reporting requirements of 2 U.S.C. § 433 and § 434. RAD additionally notified the Individual Fund of a reason to believe finding on April 12, 1979.

The Individual Fund submitted the required statement of organization and report of receipts and expenditures on May 17, 1979. In July, October and December, 1979, RAD sent the Individual Fund RFAIS with respect to specific reporting errors. To date, the Individual Fund has failed to submit the additional information requested.

ANALYSIS

2 U.S.C. § 433 and § 434 require any political committee which anticipates receiving contributions or making expenditures in an aggregate amount exceeding \$1,000 in connection with federal election activities to register and report with the Commission.

The Individual Fund initially contended that it acted as a conduit and that the \$2,000 contribution was actually the aggregate of individual contributions at \$100 each, and thus it did not need to register and report. However, RAD informed the Individual Fund that it acted as a political committee in making the contributions and therefore was required to register and report as such.

Thus, although untimely, the Individual Fund submitted a statement of organization and filed a report of receipts and expenditures in May 1979 so as to comply with the Act. The report disclosed a list of twenty individuals who made contributions of \$100 each. The Individual Fund has had no further activity since its submission of May 1979.

However, the Individual Fund has failed to respond to the three RFAIS regarding certain disclosure and reporting omissions. They are: 1) failure to note the international AFL-CIO COPE PCC, as opposed to the New York City Central Labor Council AFL-CIO, as its affiliated committee; 2) failure to notarize an independent expenditure; and 3) failure to disclose source(s) of cash on hand.

Although respondent's counsel states in a letter on January 8, 1980 that the requested information will be forthcoming, the Individual Fund has failed to submit the amended forms.

In light of the circumstances presented above, the Office of General Counsel recommends that the Commission approve and send the attached letter to the New York City Central Labor Council Individual Fund requesting submission of the required information.

RECOMMENDATION

1. Approve and send the attached letter to the New York City Central Labor Council Individual Fund.

Attachments

1 - Letter to Mr. Donald F. Menagh, Counsel for New York City Central Labor Council Individual Fund, with enclosures.

2 - RAD Referral

81040295401



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Donald F. Menagh, P.C.
130 East 40th Street
New York, New York 10016

Re: MUR 1157
New York City Central
Labor Council Individual
Fund

Dear Mr. Menagh:

On April 4, 1979 the Federal Election Commission ("the Commission") notified your client the New York City Central Labor Council Individual Fund of a reason to believe finding that your client violated the Federal Election Campaign Act of 1971, as amended ("the Act"), specifically 2 U.S.C. § 433 and § 434 for failure to file a statement of organization and to file required reports of receipts and expenditures.

On May 21, 1979, your client submitted the required statement of organization and reporting forms. However, the Commission notified you on three occasions (July 23, 1979, October 19, 1979, and December 19, 1979) that the submissions were insufficient. Specifically, the Commission requested additional information regarding the following reporting and disclosure omissions:

- 1) failure to note the international AFL-CIO COPE PCC, as opposed to the New York City Central Labor Council AFL-CIO, as its affiliated committee;
- 2) failure to notarize an independent expenditure;
and,
- 3) failure to disclose source(s) of cash on hand.

Copies of the requests are enclosed.

81040295402

Mr.
L.
Ne

To date, we have received no written response from you in connection with the requests for additional information. Please submit the requested information within 10 days of your receipt of this letter. If you fail to respond, the Office of General Counsel will proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

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, contact Carolyn Weeder, the staff member assigned to this matter at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

Procedures

Copies of Requests for Additional Information

81040295403



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 25, 1979

Mr. Harry Avrutin, Treasurer
N.Y.C. CENTRAL LABOR COUNCIL INDIVIDUAL FUND
386 Park Avenue South
New York, NY 10016

Dear Mr. Avrutin:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the January 31 Year End '78 Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Beverly Brown in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

Enc. - Page 1

79031334933
81040295404

April 24, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1157

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

81040295405

TO: N.Y.C. CENTRAL LABOR COUNCIL
INDIVIDUAL FUND

DATE: _____
I.D. NO.: C00109934

REQUEST FOR ADDITIONAL INFORMATION FOR THE January 31 Year End REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 1/1/78 THROUGH 2/28/79, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

- Coverage Dates: ___ omitted or incorrect (See page 3)
- ___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect
- ___ Detailed Summary (Page 2) Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect
- ___ Schedule Totals: ___ disagree with Detailed Summary (Page 2) or ___ omitted
- ___ Date(s): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___
- Full Name(s)/Mailing Address(es): omitted or ___ inadequate for Schedule(s) A Line(s) 14a
- Occupation/Principal Place(s) of Business: omitted or ___ inadequate for Schedule(s) A Line(s) 14a
- ___ Election Designation: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___
- ___ Aggregate Year-to-Date Totals: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___
- ___ Nature or Purpose of Expenditure: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___
- ___ Nature or Purpose of Receipt: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___
- ___ Inadequate Description of: ___ proceeds ___ dates ___ events ___ location of Schedule
- ___ Signature: ___ omitted ___ inadequate
1. CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.
- Other: Please see the attached page.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

N.Y.C. CENTRAL LABOR COUNCIL INDIVIDUAL FUND

2 U.S.C. 434(c) requires reports to be cumulative for the calendar year. Please amend your January 31 Year End report by disclosing the activity from 1/1/78 through 12/31/78. The subsequent April 10 Quarterly report should disclose the activity from 1/1/79 through 3/31/79.

Section 104.10 of the Commission's Regulations requires committees, which have cash on hand at the time of registration, to disclose the source(s) of those funds. Please amend your report to provide the source(s) of the \$224.91 reported on Line 6 of the Summary Page.

On Schedule E for Line 23 of the Detailed Summary Page you disclose and independent expenditure in support of Robert Garcia. Please be advised that Schedule E must be notarized.

For future reporting, please be advised that your committee identification number is: C00109934.

5
7903133493
81040295407

Enc-Page 3



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

OCT 19 1979

Mr. Harry Avrutin, Treasurer
N.Y.C. Central Labor Council
Individual Fund
386 Park Avenue South
New York, New York 10016

Dear Mr. Avrutin:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of your Statement of Organization, we noted that you omitted certain information. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the registration forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Beverly Brown in our Reports Analysis Division on the toll free number (800) 424-9530. Our local number is (202) 357-0026.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 11

Enc. Page 11

79031100979
81040295408

NO: N.Y.C. Central Labor Council Individual
Fund

DATE: OCT 19 1979
I.D. NO.: C00109934

REQUEST FOR ADDITIONAL INFORMATION FOR YOUR STATEMENT OF ORGANIZATION OF A POLITICAL COMMITTEE, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the statement indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required information as indicated below (X):

Signature omitted incorrect
11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

Question 5 - Complete information for: (a) , (b) , (c) , (d) , (e) .
11 CFR 102.2(a)(1) requires the identity of not only the name and address of your committee but the type of committee. Please amend your statement accordingly.

Question 6 - Name(s) of Affiliated Committee(s) and/or Connected Organization (IF NONE, SO STATE)

11 CFR 100.14(c)(2) defines an "Affiliated Committee" as a committee (including a separate segregated fund) established, financed, maintained, or controlled by the same corporation, labor organization, person, or group of persons, including any parent, subsidiary, branch, division, department, or local unit thereof. Please amend your report accordingly.

11 CFR 100.15 defines "Connected Organization" as any organization which is not a political committee but which directly or indirectly establishes, administers, or financially supports the registrant such as corporation (including one without capital stock), a labor organization, a membership organization, a cooperative, or trade association. Please amend your report accordingly.

Name, address, state and party affiliation of individual candidates supported by the committee.

Name, address and position of the committee's custodian of books and accounts.

Name, address and position of principal officers of the committee omitted inadequate.
2 U.S.C. 432(a) requires each political committee to have a Chairman and a Treasurer. 11 CFR 102.7 further stipulates that the Treasurer and Chairman are not to be the same individuals, and that no contributions may be accepted or expenditures made when there is a vacancy in either office. Please amend your statement to identify the appropriate officers.

Name(s), location(s) of bank(s), repository(ies).
2 U.S.C. 433(b)(9) requires a listing of all banks, safety deposit boxes or other repositories used by the committee be disclosed. Please amend your statement to identify all repository(ies) authorized by the candidate for your use.

Other: Please see page 3.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone number is (202) 523-40-18.

Enc. - page 5

OCT 19 1979

Political committees established by the subordinate or local union of a national or international union are required to disclose the name and address of each political committee established by the international or national union.

Your committee identifies New York City Central Labor Council, AFL-CIO as your sponsoring organization. Since this the local of AFL-CIO, you should amend your Statement of Organization to include the name of the international union as well as AFL-CIO COPE POLITICAL CONTRIBUTIONS COMMITTEE, established by the international union.

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Enc page 6



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 19, 1979

Harry Avrutin, Treasurer
N.Y.C. Central Labor Council
Individual Fund
386 Park Avenue South
New York, New York 10016

REFERENCE: January 31 Year End Report, 1978 1-1-78 → 1-31-79

Dear Mr. Avrutin:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated July 25, 1979. That notice requested information essential to full public disclosure of your Federal election financial activity and to assure compliance with provisions of the Federal Election Campaign Act (the Act).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to take legal action to insure compliance with the Act.

If you should have any questions related to this matter, please contact Kevin Kelly on our toll free number (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Thomas J. Hazelhorst
Assistant Staff Director
Reports Analysis Division

81040295411
Enc. - page 7

REPORTS ANALYSIS REFERRAL SHEET

DATE January 30, 1980 ANALYST Kevin Kelly KK
 TO: Office of General Counsel TEAM CHIEF Steve Himm SH
 THROUGH: STAFF DIRECTOR OPR COMPLIANCE REVIEW 02/03
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS MJH

CANDIDATE/COMMITTEE: N.Y.C. Central Labor Council Individual Fund
 TREASURER: Harry Avrutin
 ADDRESS: 386 Park Avenue South
 New York, NY 10016

AFFILIATE(S): N/A

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

DATE INITIATED: 12/11/78

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 1/1/78 TO 2/28/79

TOTAL RECEIPTS \$ 5,000 TOTAL EXPENDITURES \$ 4,587

CASH ON HAND \$ 637 DEBTS \$ 0.00

HISTORY: A review of Citizens for Responsive Govt. (PCC for Robert Garcia NY/21)

RESULTS OF REVIEW: disclosed contribution received from NYC Central Labor Council COPE. 1/12/78 ATTACHMENT #3
 Money was refunded by the Garcia Committee 1/31/78 #4
 A new contribution was made by the referred PAC 2/6/78 #2
 A Surface Violation letter was sent, requesting them to register ad report. 12/11/78 #5
 Letter received from referred PAC noting that their COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
 registration would be forthcoming. 1/11/79 #6
 RTB letter sent. 4/12/79 #7
 Letter received from referred PAC 4/23/79 #8
 Another letter received from the PAC 4/27/79 #9
 Committee registers with FEC 5/21/79 #10

REASON(S) FOR REFERRAL: TELECON 1/11/79 #11
 TELECON 4/27/79 #12

At this time the Commission does not have a threshold for late registrations. All late registrations must be referred.

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT

RFAI sent for failure to note AFL CIO COPE PCC as affiliated committee. 10/19/79 #13
 RFAI sent for reporting errors. 7/25/79 #14
 2nd letter sent for failure to respond to July request 12/19/79 #15

OTHER RELEVANT INFORMATION: ATTACHMENT

To date, no response has been received in answer to recent RFAIs.

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

R.R.-

81040295412

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

(Use Separate Schedules to each numbered line)

OFFICE & CONTACT INFORMATION
 Federal Election Commission
 1325 K Street, N.W.
 Washington, DC 20543

Name of Candidate or Committee in Full

Full Name, Mailing Address and ZIP Code

LAW OPPORTUNITY ACTION
 Voluntary Fund
 1124 15th St. N.W.
 Washington, D.C. 20005

Principal Place of Business

C00002840

Date (month, day, year)

2/3/78

Amount of this Payment

\$ 100.00

Occupation

Check if Contributor is self-employed

Aggregate Year-To-Date \$ 100

Principal Place of Business

Date (month, day, year)

2/6/78

Amount of each this Payment

2,000.00

Occupation

Check if Contributor is self-employed

Aggregate Year-To-Date \$ 2,000

Principal Place of Business

Date (month, day, year)

2/8/78

Amount of each this Payment

500.00

Occupation

C000022400

Check if Contributor is self-employed

Aggregate Year-To-Date \$ 2,000

Principal Place of Business

Date (month, day, year)

2/9/78

Amount of each this Payment

2,000.00

Occupation

C000002840

Check if Contributor is self-employed

Aggregate Year-To-Date \$ 2,000

Principal Place of Business

Date (month, day, year)

2/10/78

Amount of each this Payment

250.00

Occupation

C00005728

Check if Contributor is self-employed

Aggregate Year-To-Date \$ 250

Principal Place of Business

Date (month, day, year)

2/10/78

Amount of each this Payment

2,000.00

Occupation

C00004861

Check if Contributor is self-employed

Aggregate Year-To-Date \$ 2,000

Principal Place of Business

Date (month, day, year)

2/10/78

Amount of each this Payment

1,000.00

Occupation

C00002089

Check if Contributor is self-employed

Aggregate Year-To-Date \$ 1,000

Principal Place of Business

Amount of each this Payment \$ 1,000.00

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Schedule A
 July 1978
 Federal Election Commission
 1225 H Street, N.W.
 Washington, D.C. 20548

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

Page 1 of 4 for
 LINE NUMBER 15 (A)
(Also enclose schedule(s) for each numbered line)

Schedule
 July 1978
 Federal Election
 1225 H Street
 Washington,

Name of Candidate or Committee in full		Date (month, day, year)	Amount of each receipt this period
CITIZENS FOR A RESPONSIVE CONGRESS			
Full Name, mailing address and ZIP code Brooklyn Longshoreman's Political Fund- Action and Education Fund - Federal Campaign Account 343 Court Street Brooklyn, New York 11231		1/12/78	2000.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 2000.00		
Full Name, mailing address and ZIP code District 1199 Political Action Fund 310 West 43rd Street New York, N.Y. 10036		1/12/78	500.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 500.00		
Full Name, mailing address and ZIP code New York Central Labor Council COPE Committee 386 Park Avenue South New York, N.Y. 10016		1/12/78	2000.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 2000.00		
Full Name, mailing address and ZIP code Antonio G. Olivieri / Frances Reese Olivieri		1/12/78	250.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 250.00		
Full Name, mailing address and ZIP code William A. Shea 330 Madison Avenue New York, N.Y.		1/12/78	500.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 500.00		
Full Name, mailing address and ZIP code Gillman Hallenbeck		1/25/78	100.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 100.00		
Total of receipts this page (entered)			\$ 5350.00
Total (do not enter the line number only)			\$

1670
 58
 040295414
 13.00
 10
 63.00

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7 9 1 1 2 1 3 0

SENATOR BOB GARCIA FOR CONGRESS
21st Congressional District
549 East 138th Street
Bronx, New York 10454
Phone: (212) 993-6140

MS-T

January 31, 1978

Honorary Co Chairpersons

Hon. Herman Rodilla
Hon. Carlos Rollam
Bruce Llewellyn
Harry Van Arsdale

Honorary Co Campaign Managers

Hon. Jose Serrano
Hon. Mary Ann Krupsak
Hon. Charles Rangel
Victor GoSaum

Executive Committee in Formation

Hon. Robert Abrams
Hon. Carl McCall
Hon. Angelo Del Toro
Anthony Scotta
Hon. Basil Paterson
Hon. Robert Rodriguez
Hon. Harrison Goldin
Hon. Diana Lacey
Hon. Luis Olmedo
Hon. Jane Trichter
Leon Davis
Hon. Raymon Norat
Hon. Manfred Orenstein
Hon. Fred Samuels
Alfredo Matthews
Hon. Antonio Oliveri
Lillian Roberts
Angie Cabrera
Arlene Wolf
Manuel Sanchez
Barry Feinstein

Cope Comittee

New York City Central
Labor Council AFL-CIO
386 Park Avenue South
New York, New York 10016

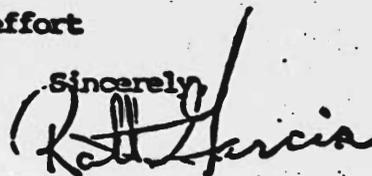
Gentlemen:

Your check in the amount of \$2,000.00 for contribution to my current campaign is sincerely appreciated.

However, because of the confused state of the law governing contributions and, further, to eliminate the possibility of any misunderstanding regarding contributions to a Congressional candidate, I am returning your check to you.

Please understand that I am grateful for your desire to be of assistance and I will continue to value your support for my campaign effort

Sincerely,



Robert Garcia

RG/gwn
Encl:

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R.R. - Page 4

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R.R. - Page 5

CITIZENS FOR A RESPONSIVE CONGRESS		NUMBER
		0021
To return contribution		January 26, 1978 1.952 260
C.O.P.E. Committee of the New York City Central Labor Council		\$2000.00
Two Thousand Dollars and xx/100		DOLLARS
 BANCO DE PONCE 10 ROCKEFELLER PLAZA NEW YORK, N. Y. 10020		
⑆0260⑉0955⑆		⑆0047⑆0000200000⑆

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FEDERAL ELECTION COMMISSION

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

New York Central Labor Council COPE Committee December 11, 1978
386 Park Avenue South
New York, N.Y. 10016

Dear Treasurer:

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 Citizens for A Responsive 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.

81040295417

R.R. - Page 6

-2-

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 James B. Brown, Jr. in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Certified Mail
Return Receipts Requested

Enclosures

8 T O 4 0 2 9 5 4 1 8

R.R. - Page 7

DONALD F. MENAGH, P.C.
ATTORNEY AT LAW
130 EAST 40TH STREET
NEW YORK, N. Y. 10016
(212) 532-3850

79 JAN 11 10 24

January 11, 1979

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

Attn.: James B. Brown, Jr.

Re: New York City Central Labor Council
COPE Committee - 2 SVI/78-155

Dear Mr. Brown:

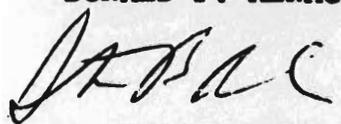
This will confirm our conversation of this morning in which I informed you that the Campaign Committee for Senator Garcia returned to the Central Labor Council COPE Committee the check for \$2,000.00 which is reflected in their report to your office. The purpose of this return was twofold, namely, to insure that the check was directed to the proper committee, and to more accurately reflect the source of the contribution.

As to this latter point, the COPE Committee does not make contributions to Congressional candidates. The source of the \$2,000.00 to Senator Garcia's campaign was a number of individual contributions in the neighborhood of \$60.00 each. The contributions were collected by the Central Labor Council's Individual Contributions Fund and distributed to Senator Garcia in one lump sum.

Based on the foregoing, the Central Labor Council will forward, as soon as reasonably practical, a Statement of Organization on Form FEC-1 and a Receipts and Expenditures Report on Form FEC-3. This latter report will indicate the names and addresses of the individual contributors to the Garcia Campaign.

Very truly yours,

DONALD F. MENAGH

By: 

Stuart Bochner

SB/er

R.R. - Page 8

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FEDERAL ELECTION COMMISSION

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

April 12, 1979

Treasurer
NEW YORK CENTRAL LABOR COUNCIL COPE COMMITTEE
386 Park Avenue South
New York, NY 10016

Dear Treasurer:

On December 11, 1978, you were notified that your committee 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 January 11, 1979, however, we found your response to be inadequate. Specifically, reports filed with the Commission indicate your committee made an additional contribution to Citizens for a Responsive Congress on February 2, 1979. Your failure to provide an adequate response gives the Commission reason to believe that your committee may have committed a violation of 2 U.S.C. 433 and 434.

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) 424-9350. Our local number is 523-4048.

Sincerely,

Commissioner

Certified Mail:
Return Receipt Requested

AD COMPL RESPONSE REC'D
Refer To: 78031274362

78010341022794547230

DONALD F. MENAGH, P.C.
ATTORNEY AT LAW
130 EAST 40TH STREET
NEW YORK, N. Y. 10016
(212) 532-3850

FEDERAL ELECTION
COMMISSION

'79 APR 23 AM 10:10

April 18, 1979

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

RE: New York City Central Labor Council COPE Committee
(2SV2/78-155)

Gentlemen:

This letter is in response to your letter of April 12, 1979 addressed to Treasurer, New York Central Labor Council COPE Committee, with regard to contributions made to the campaign of Senator Garcia for the U. S. Congress.

On January 11, 1979, after speaking with Mr. James Brown, Jr., of your Reports Analysis Division, I wrote to you setting forth the circumstances of the COPE Committee's contribution on behalf of Senator Garcia. That communication stated that the COPE Committee acted as a conduit in transferring individual contributions of less than \$100.00 each to the Citizens for a Responsive Congress, Senator Garcia's Campaign Committee.

Your April 12th letter now indicates that our January 11th response was inadequate. Your letter, however, fails to indicate what additional information is required. The COPE Committee will be happy to provide whatever information is desired by the Commission.

Your letter of April 12th also makes reference to an "additional contribution" on February 2, 1979. Please be advised that the original contribution of \$2,000.00 representing the individual contributions as already indicated, was returned by Senator Garcia with the instruction to remake the contribution directly to his Campaign Committee. Thus, only one \$2,000.00 contribution is at issue.

If I can be of any further assistance, please do not hesitate to contact me. I await your response.

Very truly yours,

Donald F. Menagh
Donald F. Menagh

DFM/er

R.R. - Page 10

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DONALD F. MENAGH, P.C.
ATTORNEY AT LAW
130 EAST 40TH STREET
NEW YORK, N. Y. 10016
(212) 533-3880

April 27, 1979

79 MAY 2 PM 2

FEDERAL ELECTION COMMISSION

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

RE: NEW YORK CITY CENTRAL LABOR COUNCIL, AFL-CIO
COPE COMMITTEE

Dear Ms. Brown:

This will confirm our conversation of this date concerning the above referenced organization.

You advised that, since the Cope Committee made contributions to the Congressional Campaign of Senator Garcia in excess of \$1,000.00, it would be required to register under the Act. I explained that my understanding of previous conversations with your office was that such registration was not necessary. In order to clarify this situation, the Cope Committee will be happy to register under the Act and file all necessary reports and papers. Consequently, you may expect to find Form FEC 1 and 3 forwarded to your office within the next two weeks.

In addition I brought to your attention the fact that the Cope Committee received a Mailgram, dated April 24, 1979, from the Chairman of the Commission advising that quarterly reports due April 10, 1979 were not filed. You indicated that the Cope Committee should not have received such a Mailgram at this time but that, after registration, quarterly reports will be required to be filed. In this regard please also be advised that the Cope Committee made no contributions or received funds reportable under the Act, with the exception of the above mentioned contribution to Senator Garcia.

Thank you very much for your cooperation in this matter.

Very truly yours,

DONALD F. MENAGH

By: *Stuart Bochner*
Stuart Bochner

SB/er

R.R. - Page 11

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RECEIVED
FEDERAL ELECTION
COMMISSION

'79 MAY 21 AM 10:58

May 17, 1979

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

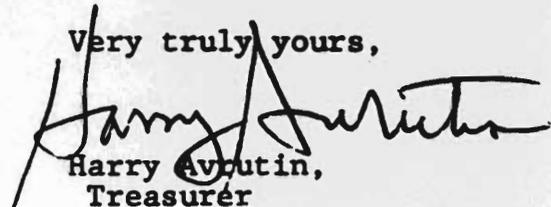
Gentlemen:

Enclosed as requested is the Statement of Organization (FEC-1) form and Report of Receipts and Expenditures (FEC-3) form for the New York City Central Labor Council Individual Fund.

Please be advised that, because of a similarity of names of other organizations, the name of the committee has been changed from the New York City Central Labor Council COPE Fund to the New York City Central Labor Council Individual Fund.

In addition, please note that the Receipts and Expenditures report is complete through February 28, 1979 and that the Fund has neither received nor expended monies since that date.

Very truly yours,


Harry Avoutin,
Treasurer

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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

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

179 MAY 21 10 10 AM '79

1(a) Name of Committee (in full) <input checked="" type="checkbox"/> Check if name or address is changed N.Y.C. CENTRAL LABOR COUNCIL INDIVIDUAL FUND	2 Identification Number
(b) Address (number and street) 386 Park Avenue South	3 Date 5/15/79
(c) City, State and ZIP code New York, New York 10016	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 to be held in the State of _____ (Federal office sought) (Year of election) (State in which election is held)
 (THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR 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(s) held in _____ (General, Primary, Runoff, etc) (Year of election in State) and will file all reports and statements with the candidate's principal campaign committee, _____ (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.)

819040275A728

6 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship
New York City Central Labor Council, AFL-CIO	386 Park Avenue South New York, New York 10016	Connected

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).

Statement of Organization of a Committee
 (Page 2) RECEIVED
FEDERAL ELECTION
COMMISSION

79 MAY 21 AM 10:58

Name of Committee: **N.Y.C. Central Labor Council Individual Fund**

- 7 Area, Scope and Jurisdiction of Committee:
- (a) Will this committee operate in more than one State? Yes No
 - (b) Will it operate on a statewide basis in one State? Yes No
 - (c) Will it primarily support candidates seeking State or local office? Yes No
 - (d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? Yes No

8 (a) 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
Robert Garcia	Citizens For A Responsive Congress 549 East 138th Street Bronx, New York 10454	House of Representatives	Democrat

(b) 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
Hugh Carey	Albany, New York	Governor	Democrat

9 If this committee is supporting the entire ticket of a party, give name of party ▶

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
Harry Avrutin	386 Park Avenue South New York, New York 10016	Treasurer

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).

871203401249754432750

R.R. Page 14

Statement of Organization for a Committee

(Page 3)

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

Name of Committee **N.Y.C. Central Labor Council Individual Fund**

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
Christopher Plunkett	386 Park Avenue South New York, New York 10016	Chairman
Harry Avrutin	386 Park Avenue South New York, New York 10016	Treasurer

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? Contributed to N.Y.C. Central Labor Council COPE

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
Amalgamated Bank of N.Y.	11-15 Union Square New York, New York

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 439(a)):

Report title	Date required	Name and position of recipient	Mailing address and ZIP code

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.

Harry Avrutin
(Signature of Treasurer)

5/18/79
(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 §441 (see instructions)

For further information contact:

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

871900401229754432761

R.R. Page 15

DONALD F. MENAGH, P.C.
ATTORNEY AT LAW
130 EAST 42ND STREET
NEW YORK, N. Y. 10016
(212) 520-0000

RECEIVED
FEDERAL ELECTION

30 JAN 14 AM 10:00

January 8, 1980

Federal Election Commission
Washington, D. C. 20463

Attn.: Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

RE: January 31 Year End Report, 1978

Dear Mr. Haselhorst:

The N.Y.C. Central Labor Council Individual Fund has requested me, as its attorney, to respond to your letter of December 19, 1979. This letter refers to a prior request of July 25, 1979.

Please be advised that this office contacted Miss Brown of the FEC in early August, 1979, concerning the prior request. At that time certain information was given to Miss Brown who indicated that no further response would be necessary.

The foregoing notwithstanding, the Individual Fund will be happy to provide any information requested by the Commission.

In this regard may I suggest that you forward to this office an itemization of the information required. Upon receipt of this itemization, a response will be forthcoming.

Very truly yours,

DONALD F. MENAGH

By:

Stuart Bochner
Stuart Bochner

SB/er

R.R-Page 16

REPORTS ANALYSIS REFERRAL SHEET

DATE January 30, 1980 ANALYST Kevin Kelly KK
 TO: Office of General Counsel TEAM CHIEF Steve Mims SM
 THROUGH: STAFF DIRECTOR AP COMPLIANCE REVIEW 03/03
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS MJH

CANDIDATE/COMMITTEE: N.Y.C. Central Labor Council Individual Fund
 TREASURER: Harry Avrutin
 ADDRESS: 386 Park Avenue South
 New York, NY 10016

AFFILIATE(S): N/A

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

DATE INITIATED: 12/11/78

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 1/1/78 TO 2/28/79
 TOTAL RECEIPTS \$ 5,000 TOTAL EXPENDITURES \$ 4,587
 CASH ON HAND \$ 637 DEBTS \$ 0.00

HISTORY: A review of Citizens for Responsive Govt. (PCC for Robert Garcia NY/21) disclosed contribution received from NYC Central Labor Council COPE. ATTACHMENT #3
 Money was refunded by the Garcia Committee 1/12/78 #4
 A new contribution was made by the referred PAC 1/31/78 #4
 A Surface Violation letter was sent, requesting them to register ad report. 2/6/78 #2
 Letter received from referred PAC noting that their registration would be forthcoming. 12/11/78 #5
 COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT #6
 registration would be forthcoming. 1/11/79 #6
 RTB letter sent. 4/12/79 #7
 Letter received from referred PAC 4/23/79 #8
 Another letter received from the PAC 4/27/79 #9
 Committee registers with FEC 5/21/79 #10
 REASON(S) FOR REFERRAL: ATTACHMENT #11
 TELECON 1/11/79 #11
 TELECON 4/27/79 #12

At this time the Commission does not have a threshold for late registrations. All late registrations must be referred.

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT #13
 RFAI sent for failure to note AFL CIO COPE PCC as affiliated committee. 10/19/79 #13
 RFAI sent for reporting errors. 7/25/79 #14
 2nd letter sent for failure to respond to July request 12/19/79 #15
 OTHER RELEVANT INFORMATION: ATTACHMENT

To date, no response has been received in answer to recent RFAIs.

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

R.R. - 10001

RAD 80L-32
D-621

REPORTS ANALYSIS REFERRAL UPDATE

***ORIGIN:** RAD

DATE March 11, 1980

ANALYST Kevin Kelly *KK*

TO: Office of General Counsel
ATTENTION: Carolyn Heeder

TEAM CHIEF Steve Mims *SM*

THROUGH: STAFF DIRECTOR *B.L. for O.B.P.*

COMPLIANCE REVIEW rs

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *YH*

MUR No. 1157(80)

DATE OF ORIGINAL REFERRAL Jan. 30, 1980

RAD Referral No. 80L-32

****PURPOSE:** Informational

8
1
0
4
7
2
9
5
4
2
9

As noted on the original referral under Other Relevant Information, two RFAIs were sent last July to the referred committee. (Attachments 13 and 14 on the original referral) On December 19, 1979 a second letter was sent. (Attachment 15 on the original referral) The referred committee responded on January 14, 1980, stating that they did not have copies of the original requests. (Update attachment A) During a telephone conversation on January 20, 1980, the attorney for the committee stated that they would forward the information but he needed copies of the original requests. (Update attachment B) Copies of the RFAIs were sent to the attorney. To date, no response has been received.

OUTCOME: (if applicable)

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

DONALD F. MERRICK, P.S.
ATTORNEY AT LAW
200 WEST 42ND STREET
NEW YORK, N. Y. 10018
NEW YORK

RECEIVED
FEDERAL ELECTION
COMMISSION
JAN 19 1980

January 8, 1980

Federal Election Commission
Washington, D. C. 20463

Attn.: Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

RE: January 31 Year End Report, 1978

Dear Mr. Haselhorst:

The N.Y.C. Central Labor Council Individual Fund has requested me, as its attorney, to respond to your letter of December 19, 1979. This letter refers to a prior request of July 25, 1979.

Please be advised that this office contacted Miss Brown of the FEC in early August, 1979, concerning the prior request. At that time certain information was given to Miss Brown who indicated that no further response would be necessary.

The foregoing notwithstanding, the Individual Fund will be happy to provide any information requested by the Commission.

In this regard may I suggest that you forward to this office an itemization of the information required. Upon receipt of this itemization, a response will be forthcoming.

Very truly yours,
DONALD F. MERRICK

By: Stuart Bochner
Stuart Bochner

SB/er

81010195430

001114794

Telecon For Files:

From: Stuart Bochner

To: Kevin Kelly

Date: 1/20/80

Cmte: N.Y.C. Central Labor Council Individual Fund

RE: RTB on July 25 RFAI

Mr. Bochner returned my call of 1/16/80. I wanted to discuss his letter of 1/8/80 which said that the questions posed in the RFAI referred to were answered on the telephone with Ms. Beverly Brown back in early August. I told Mr. Bochner that we had not received anything in writing from them and the matter could not be closed until we received something. He said that he did not have a copy of the request but would be glad to answer in writing if we would forward a copy of the request to him. (I then copied the RFAI and sent it to his attention)

81040295431

REPORTS ANALYSIS REFERRAL SHEET

DATE January 30, 1980 ANALYST Kevin Kelly KK
 TO: Office of General Counsel TEAM CHIEF Steve Mims SM
 THROUGH: STAFF DIRECTOR OPP COMPLIANCE REVIEW col/93
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS NYH

CANDIDATE/COMMITTEE: N.Y.C. Central Labor Council Individual Fund
 TREASURER: Harry Avrutin
 ADDRESS: 386 Park Avenue South
New York, NY 10016

AFFILIATE(S): N/A

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

DATE INITIATED: 12/11/78

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 1/1/78 TO 2/28/79

TOTAL RECEIPTS \$ 5,000 TOTAL EXPENDITURES \$ 4,567

CASH ON HAND \$ 637 DEBTS \$ 0.00

HISTORY: A review of Citizens for Responsive Govt. (PCC for Robert Garcia NY/21) disclosed contribution received from NYC Central Labor Council COPE.

RESULTS OF REVIEW: Money was refunded by the Garcia Committee 1/12/78 ATTACHMENT #3
 A new contribution was made by the referred PAC 1/31/78 #4
 A Surface Violation letter was sent, requesting them to register and report. 2/6/78 #2
 Letter received from referred PAC noting that their registration would be forthcoming. 12/11/78 #5

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
 registration would be forthcoming. 1/11/79 #6
 RTB letter sent. 4/12/79 #7
 Letter received from referred PAC 4/23/79 #8
 Another letter received from the PAC 4/27/79 #9
 Committee registers with FEC 5/21/79 #10

REASON(S) FOR REFERRAL: ATTACHMENT
 TELECON 1/11/79 #11
 TELECON 4/27/79 #12

At this time the Commission does not have a threshold for late registrations. All late registrations must be referred.
 OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT

RFAI sent for failure to note AFL CIO COPE PCC as affiliated committee. 10/19/79 #13
 RFAI sent for reporting errors. 7/25/79 #14
 Letter sent for failure to respond to July request 12/19/79 #15

OTHER RELEVANT INFORMATION: ATTACHMENT
 To date, no response has been received in answer to recent RFAIs.

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
NEW YORK CITY CENTRAL LABOR COUNCIL INDIVIDUAL FUND								IBO C00109934
CONNECTED ORGANIZATION: AFL-CIO; N Y C CENTRAL LABOR COUNCIL								
	1979 MISCELLANEOUS TRANSACTION TO F.E.C.					16JAN79	2	79FEC/117/2224
	REQUEST FOR ADDITIONAL INFORMATION					12APR79	1	79FEC/127/4473
	MISCELLANEOUS TRANSACTION TO F.E.C.					23APR79	2	79FEC/126/0538
	MISCELLANEOUS TRANSACTION FROM F.E.C.					27APR79	2	79FEC/127/4475
	STATEMENT OF ORGANIZATION					21MAY79	6	79FEC/127/4368
	REQUEST FOR ADDITIONAL INFORMATION					19OCT79	4	79FEC/140/0979
	1978 REQUEST FOR ADDITIONAL INFO 2ND					1JAN78 -20FEB79	2	79FEC/142/5352
	1979 JULY 10 QUARTERLY 3A - POSTCARD					1APR79 -30JUN79	2	79FEC/134/1926

*ALL Documents have
 been Reviewed.
 KK.*

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
	NEW YORK CITY CENTRAL LABOR COUNCIL INDIVIDUAL FUND							ID# C00109934
	CONNECTED ORGANIZATION: AFL-CIO; N Y C CENTRAL LABOR COUNCIL							
	1978 REQUEST FOR ADDITIONAL INFORMATION					11DEC78	1	79FEC/098/2443
	1979 REQUEST FOR ADDITIONAL INFORMATION					12APR79	1	79FEC/127/4473
	1977 REQUEST FOR ADDITIONAL INFORMATION					1JAN78 -28FER78	4	79FEC/133/4933
	1978 YEAR END REPORT	5,000		4,587		1JAN78 -28FEB79	10	79FEC/127/4373
	TOTAL	5,000	0	4,587	0		16	TOTAL PAGES

HOUSE A
 FORM 2880
 4-6-78
 Federal Election Commission
 1225 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 2 of 3 to

Line Number 189

(Use Separate Schedules to
 each numbered line)

Name of Candidate or Committee in Full

Full Name, Mailing Address and ZIP Code

LAW COMMUNITY ACTION
 Voluntary Fund
 1124 15th St. N.W.
 Washington, D.C. 20005

Principal Place of Business

C00002840

Occupation

Date (month, day, year)

2/3/78

Amount of this Form

\$ 100.00

Check if Contributor is self-employed

Aggregate Year-To-Date \$ 100

Full Name, Mailing Address and ZIP Code

N.Y.C. Central Labor Council
 Individual Contributions Fund
 300 Park Avenue South
 New York, N.Y.

Principal Place of Business

Occupation

Date (month, day, year)

2/6/78

Amount of each this Form

2,000.00

Check if Contributor is self-employed

Aggregate Year-To-Date \$ 2,000

Full Name, Mailing Address and ZIP Code

District 1199 P A F
 310 W. 43rd. Street
 New York, N.Y. 10036

Principal Place of Business

Occupation

C00022400

Date (month, day, year)

2/8/78

Amount of each this Form

500.00

Check if Contributor is self-employed

Aggregate Year-To-Date \$ 2,500

Full Name, Mailing Address and ZIP Code

1000 W. Oak
 1000 W. Jefferson
 Detroit, Michigan 48203

Principal Place of Business

Occupation

C00002840

Date (month, day, year)

2/9/78

Amount of each this Form

2,000.00

Check if Contributor is self-employed

Aggregate Year-To-Date \$ 2,600

Full Name, Mailing Address and ZIP Code

1000 W. Oak
 1000 W. Jefferson
 Detroit, Michigan 48203

Principal Place of Business

Occupation

C00005728

Date (month, day, year)

2/10/78

Amount of each this Form

250.00

Check if Contributor is self-employed

Aggregate Year-To-Date \$ 2,850

Full Name, Mailing Address and ZIP Code

I.L.W. U.M.W. / Campaign Committee
 1710 Broadway
 New York, N.Y. 10019

Principal Place of Business

Occupation

C00004861

Date (month, day, year)

2/10/78

Amount of each this Form

2,000.00

Check if Contributor is self-employed

Aggregate Year-To-Date \$ 3,000

Full Name, Mailing Address and ZIP Code

OGE COMM - PAC
 1225 K Street, N.W.
 Washington, D.C. 20546

Principal Place of Business

Occupation

C00002089

Date (month, day, year)

2/10/78

Amount of each this Form

1,000.00

Check if Contributor is self-employed

Aggregate Year-To-Date \$ 1,000

Full Name, Mailing Address and ZIP Code

18K
 18K
 18K
 18K
 18K
 18K
 18K

81040295435

\$ 7,000.00

Schedule A
 July 1978
 Federal Election Commission
 1200 G Street, N.W.
 Washington, D.C. 20543

**Itemized Receipts,
 Contributions, Ticket Purchases, Loans,
 Debates, and Transfers for Line
 Numbers 15, 16, 17 and/or 18 of FEC Form 3**
 (See instructions on back)

Page 1 of 4 for
LINE NUMBER 15 (A)

(Use separate schedules for each numbered line)

Schedule
 July 1978
 Federal Election
 1200 G Street
 Washington,

Name of Candidate or Committee in full			
CITIZENS FOR A RESPONSIVE CONGRESS			
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Brooklyn Longshoremen's Political Fund- Action and Education Fund - Federal Campaign Account 349 Court Street Brooklyn, New York 11231		1/12/78	2000.00
Principal place of business		Occupation	
		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-to-date \$ 2000.00	
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
District 1189 Political Action Fund 310 West 43rd Street New York, N.Y. 10035		1/12/78	500.00
Principal place of business		Occupation	
		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-to-date \$ 500.00	
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
New York Central Labor Council COPE Committee 386 Park Avenue South New York, N.Y. 10016		1/12/78	2000.00
Principal place of business		Occupation	
		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-to-date \$ 2000.00	
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Antonio G. Olivieri/Frances Reese Olivieri		1/12/78	250.00
Principal place of business		Occupation	
		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-to-date \$ 250.00	
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
William A. Shea 300 Madison Avenue New York, N.Y.		1/12/78	500.00
Principal place of business		Occupation	
		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-to-date \$ 500.00	
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Gillman Hallenbeck		1/25/78	100.00
Principal place of business		Occupation	
		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-to-date \$ 100.00	
Total of receipts this page (entered)			\$ 5350.00
Total (do not enter this line number only)			\$

1670

10

3-6

4-3-6

5-4-3-6

6-5-4-3-6

7-8-7-1-2-4-3-0

8-7-1-2-4-3-0

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

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

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

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

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

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

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

6-5-4-3-2-1-0-9-8-7-1-2-4-3-0

7-6-5-4-3-2-1-0-9-8-7-1-2-4-3-0

8-7-6-5-4-3-2-1-0-9-8-7-1-2-4-3-0

9-8-7-6-5-4-3-2-1-0-9-8-7-1-2-4-3-0

0-9-8-7-6-5-4-3-2-1-0-9-8-7-1-2-4-3-0

1-0-9-8-7-6-5-4-3-2-1-0-9-8-7-1-2-4-3-0

2-1-0-9-8-7-6-5-4-3-2-1-0-9-8-7-1-2-4-3-0

3-2-1-0-9-8-7-6-5-4-3-2-1-0-9-8-7-1-2-4-3-0

4-3-2-1-0-9-8-7-6-5-4-3-2-1-0-9-8-7-1-2-4-3-0

5-4-3-2-1-0-9-8-7-6-5-4-3-2-1-0-9-8-7-1-2-4-3-0

6-5-4-3-2-1-0-9-8-7-6-5-4-3-2-1-0-9-8-7-1-2-4-3-0

7-6-5-4-3-2-1-0-9-8-7-6-5-4-3-2-1-0-9-8-7-1-2-4-3-0

8-7-6-5-4-3-2-1-0-9-8-7-6-5-4-3-2-1-0-9-8-7-1-2-4-3-0

9-8-7-6-5-4-3-2-1-0-9-8-7-6-5-4-3-2-1-0-9-8-7-1-2-4-3-0

0-9-8-7-6-5-4-3-2-1-0-9-8-7-6-5-4-3-2-1-0-9-8-7-1-2-4-3-0

1-0-9-8-7-6-5-4-3-2-1-0-9-8-7-6-5-4-3-2-1-0-9-8-7-1-2-4-3-0

2-1-0-9-8-7-6-5-4-3-2-1-0-9-8-7-6-5-4-3-2-1-0-9-8-7-1-2-4-3-0

3-2-1-0-9-8-7-6-5-4-3-2-1-0-9-8-7-6-5-4-3-2-1-0-9-8-7-1-2-4-3-0

7 8 7 1 2 4 3 0

SENATOR BOB GARCIA FOR CONGRESS
21st Congressional District
549 East 138th Street
Bronx, New York 10454
Phone: (212) 993-6140

MS-7

January 31, 1978

Honorary Co Chairpersons

Hon. Herman Radtke
Hon. Corrie Pittman
Bruce Llewellyn
Harry Van Arsdale

Honorary Co Campaign Managers

Hon. Jose Serrano
Hon. Mary Ann Krupsak
Hon. Charles Rangel
Victor Gozbaum

Executive Committee in Formation

Hon. Robert Abrams
Hon. Carl McCall
Hon. Angelo Del Toro
Anthony Scotti
Hon. Basil Paterson
Hon. Robert Rodriguez
Hon. Harrison Goldin
Hon. Diana Lacey
Hon. Luis Olmedo
Hon. Jane Trichter
Leon Davis
Hon. Raymon Norat
Hon. Manfred Orenstein
Hon. Fred Samuels
Alfredo Matthews
Hon. Antonio Oliveri
Lillian Roberts
Angie Cabrera
Arlene Wolf
Manuel Sanchez
Barry Feinstein

COPE Committee
New York City Central
Labor Council AFL-CIO
386 Park Avenue South
New York, New York 10016

Gentlemen:

Your check in the amount of \$2,000.00 for contribution to my current campaign is sincerely appreciated.

However, because of the confused state of the law governing contributions and, further, to eliminate the possibility of any misunderstanding regarding contributions to a Congressional candidate, I am returning your check to you.

Please understand that I am grateful for your desire to be of assistance and I will continue to value your support for my campaign effort

Sincerely,



Robert Garcia

RG/gwn
Encls

8 1700 1001 19:50 4: 31 7:

7 9 0 1 1 5 0 1 1 5 2

To return contribution		CITIZENS FOR A RESPONSIVE CONGRESS		NUMBER
				0021
TOTAL OF CHECKS		C.O.P.E. Committee of the		January 26, 1978 1-952
LESS DISCOUNT		New York City Central Labor Council		260
LESS		PAY TO THE ORDER OF		\$2000.00
TOTAL WITH DISCOUNT		Two Thousand Dollars and xx/100		DOLLARS
BALANCE OF CHECK		BANCO DE PONCE		
		10 ROCKEFELLER PLAZA		
		NEW YORK, N. Y. 10020		
		⑆0260⑉0955⑆		⑆0047⑆0000200000⑆



8 1 0 4 0 2 9 5 4 3 8

87 0 0 10 12 9 05 14 3 5 2

Pay to the order of the
Amalgamated Bank of New York
New York City Central Labor
Council C.O.P.E. Committee
02-292512

PAY TO THE ORDER OF
NEW YORK

559

FEB -2 72

PAY TO THE ORDER OF
NEW YORK, N.Y.

NEW YORK 1-13 7 60 FEB 3

AMERICAN EXPRESS
NEW YORK
FEB 2 2 0



FEDERAL ELECTION COMMISSION

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

New York Central Labor Council COPE Committee December 11, 1978
386 Park Avenue South
New York, N.Y. 10016

Dear Treasurer:

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 Citizens for A Responsive 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.

81010295440

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 James B. Brown, Jr. in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Certified Mail
Return Receipts Requested

Enclosures

8-1-0-1-0-2-9-5-4-4-1

81010295442

RAPID NOTE
FROM

Mr. James B. Brown, Jr

DATE 1/11/79

File 212-532-3150

NY Central Labor Council Cope Cate

Spoke with Mr. Stewart Bockner in regards to an unrec. cate making an excess of \$1000 contrib. He indicated that the monies were from vol. contributors and that he will register the cate in question. Also, response to this conversation is forth coming.

SIGNED

Mr. James B. Brown, Jr.

DONALD F. MENAGH, P.C.

ATTORNEY AT LAW
130 EAST 40TH STREET
NEW YORK, N. Y. 10016

(212) 532-3850

79 JAN 11 10 24

January 11, 1979

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

Attn.: James B. Brown, Jr.

Re: New York City Central Labor Council
COPE Committee - 2 SVI/78-155

Dear Mr. Brown:

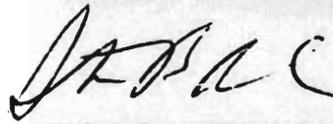
This will confirm our conversation of this morning in which I informed you that the Campaign Committee for Senator Garcia returned to the Central Labor Council COPE Committee the check for \$2,000.00 which is reflected in their report to your office. The purpose of this return was twofold, namely, to insure that the check was directed to the proper committee, and to more accurately reflect the source of the contribution.

As to this latter point, the COPE Committee does not make contributions to Congressional candidates. The source of the \$2,000.00 to Senator Garcia's campaign was a number of individual contributions in the neighborhood of \$60.00 each. The contributions were collected by the Central Labor Council's Individual Contributions Fund and distributed to Senator Garcia in one lump sum.

Based on the foregoing, the Central Labor Council will forward, as soon as reasonably practical, a Statement of Organization on Form FEC-1 and a Receipts and Expenditures Report on Form FEC-3. This latter report will indicate the names and addresses of the individual contributors to the Garcia Campaign.

Very truly yours,

DONALD F. MENAGH

By: 

Stuart Bochner

SB/er

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FEDERAL ELECTION COMMISSION

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

Treasurer
NEW YORK CENTRAL LABOR COUNCIL COPE COMMITTEE
386 Park Avenue South
New York, NY 10016

Dear Treasurer:

On December 11, 1978, you were notified that you have made contributions to a political committee under 2 U.S.C. 433 and 434.

We received a response from you on January 11, 1979. We found your response to be inadequate. Some of the contributions with the Commission indicate your committee's contribution to Citizens for a Responsive Congress. Your failure to provide an adequate response is the reason to believe that your committee may have violated 2 U.S.C. 433 and 434.

The Commission will take no action if you had a reasonable opportunity to respond to the letter. The letter should be mailed to the Commission within 30 days of the date of this letter.

If you have responded to the above information, please contact Beverly Brown, Director, at the address listed to you on our toll free number (800) 425-5523 or (202) 523-4048.

Since

Commissioner

Certified Mail:
Return Receipt Requested



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DONALD F. MENAGH, P.C.
ATTORNEY AT LAW
130 EAST 40TH STREET
NEW YORK, N. Y. 10016
(212) 633-3850

FEDERAL ELECTION COMMISSION

'79 APR 23 AM 10:10

April 18, 1979

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

RE: New York City Central Labor Council COPE Committee
(2SV2/78-155)

Gentlemen:

This letter is in response to your letter of April 12, 1979 addressed to Treasurer, New York Central Labor Council COPE Committee, with regard to contributions made to the campaign of Senator Garcia for the U. S. Congress.

On January 11, 1979, after speaking with Mr. James Brown, Jr., of your Reports Analysis Division, I wrote to you setting forth the circumstances of the COPE Committee's contribution on behalf of Senator Garcia. That communication stated that the COPE Committee acted as a conduit in transferring individual contributions of less than \$100.00 each to the Citizens for a Responsive Congress, Senator Garcia's Campaign Committee.

Your April 12th letter now indicates that our January 11th response was inadequate. Your letter, however, fails to indicate what additional information is required. The COPE Committee will be happy to provide whatever information is desired by the Commission.

Your letter of April 12th also makes reference to an "additional contribution" on February 2, 1979. Please be advised that the original contribution of \$2,000.00 representing the individual contributions as already indicated, was returned by Senator Garcia with the instruction to remake the contribution directly to his Campaign Committee. Thus, only one \$2,000.00 contribution is at issue.

If I can be of any further assistance, please do not hesitate to contact me. I await your response.

Very truly yours,

Donald F. Menagh
Donald F. Menagh

DFM/er

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TELECON

COMMITTEE: NEW YORK CITY CENTRAL LABOR COUNCIL COPE COMMITTEE
ANALYST: BEVERLY BROWN
COMMITTEE CONTACT: MR. BOCHNER, ATTORNEY
DATE: 4/27/79
PHONE NUMBER: (212) - 532-3850

CONCERNING: SURFACE VIOLATION - 2SV2/78-155 FAILURE TO REGISTER AND FILE
TIMELY REPORTS AND STATEMENTS

Background: On 12/11/78 a surface violation notice was sent to the above committee to inform them that they were in violation of 2 U.S.C. 433 & 434. The committee had contributed \$2000 to Senator Garcia's campaign without registering and reporting this activity.

Senator Garcia later returned this contribution and requested that the committee make their check payable to his principal campaign committee. the committee followed his instruction and sent another check on 2/6/78.

Later, the New York City Central Labor Council COPE Committee responded to our surface violation notice by stating that an FEC Form 1 registration statement would be forthcoming.

One month later, the Commission still had not received a statement of Organization from this committee. Therefore, a second notice was sent which stated that the Commission had received an inadequate response from the committee.

On 4/18/79 the Commission received a response from the committee's treasurer. The letter stated that the committee had acted as a conduit in turning over individual contributions to senator Garcia. This response was again inadequate so I attempted to reach the treasurer, Mr. Menagh by phone.

TODAY:

Mr. Bochner returned my call and asked why the committee had received a letter stating that their response was inadequate. I informed Mr. Bochner that the committee had failed to register their committee by sending in an FEC Form 1 Statement of Organization. I also informed Mr. Bochner that the committee would be required to file a report of receipts and expenditures . This report would have to disclose all past activity the committee had had since it's organization. Mr. Bochner stated that the committee was set up mainly to support candidates for state and local elections. He asked if it was permissible to contribute to federal candidates from an account which held funds for state and Local candidates. I informed Mr. Bochner that it was permissible if this account did not also contain labor or corporate funds. He assured me that it did not. I suggested that it is perhaps better to keep a Federal account separate from an account which hold funds for state and local candidates simply because the committee would have to report all activity including that which pertains to State and Local activity.

I asked Mr. Bochner if the committee intended to continue their support of Federal candidates. If not, I informed him, they could do one of two things: 1) request a refund of the \$2000 from Senator Garcia or, 2) register and terminate within the same report. Mr. Bochner stated that the committee may intend to continue their support of Federal candidates.

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DONALD F. MENAGH, P.C.
ATTORNEY AT LAW
130 EAST 40TH STREET
NEW YORK, N. Y. 10016
(212) 532-3850

April 27, 1979

719 MAY - PM 2

FEDERAL ELECTION
COMMISSION

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

RE: NEW YORK CITY CENTRAL LABOR COUNCIL, AFL-CIO
COPE COMMITTEE

Dear Ms. Brown:

This will confirm our conversation of this date concerning the above referenced organization.

You advised that, since the Cope Committee made contributions to the Congressional Campaign of Senator Garcia in excess of \$1,000.00, it would be required to register under the Act. I explained that my understanding of previous conversations with your office was that such registration was not necessary. In order to clarify this situation, the Cope Committee will be happy to register under the Act and file all necessary reports and papers. Consequently, you may expect to find Form FEC 1 and 3 forwarded to your office within the next two weeks.

In addition I brought to your attention the fact that the Cope Committee received a Mailgram, dated April 24, 1979, from the Chairman of the Commission advising that quarterly reports due April 10, 1979 were not filed. You indicated that the Cope Committee should not have received such a Mailgram at this time but that, after registration, quarterly reports will be required to be filed. In this regard please also be advised that the Cope Committee made no contributions or received funds reportable under the Act, with the exception of the above mentioned contribution to Senator Garcia.

Thank you very much for your cooperation in this matter.

Very truly yours,

DONALD F. MENAGH

By: 

Stuart Bochner

SB/er

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RECEIVED
FEDERAL ELECTION
COMMISSION

'79 MAY 21 AM 10:58

May 17, 1979

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

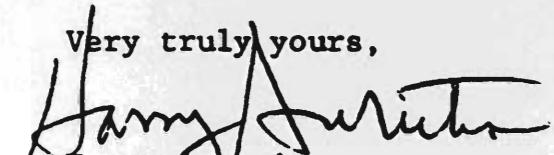
Gentlemen:

Enclosed as requested is the Statement of Organization (FEC-1) form and Report of Receipts and Expenditures (FEC-3) form for the New York City Central Labor Council Individual Fund.

Please be advised that, because of a similarity of names of other organizations, the name of the committee has been changed from the New York City Central Labor Council COPE Fund to the New York City Central Labor Council Individual Fund.

In addition, please note that the Receipts and Expenditures report is complete through February 28, 1979 and that the Fund has neither received nor expended monies since that date.

Very truly yours,


Harry Avcutin,
Treasurer

78703403394343

Statement of Organization For a Political Committee

Supporting any candidate(s) 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

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

1(a) Name of Committee (in full) <input checked="" type="checkbox"/> Check if name or address is changed N.Y.C. CENTRAL LABOR COUNCIL INDIVIDUAL FUND	2 Identification Number
(b) Address (number and street) 386 Park Avenue South	3 Date 5/15/79
(c) City, State and ZIP code New York, New York 10016	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 to be held in the State of _____ (State in which election is held) (Federal office sought) (Year of election)

(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR 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(s) held in _____, and will file all reports and statements with the candidate's principal campaign committee, _____ (General, Primary, Runoff, etc) (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
New York City Central Labor Council, AFL-CIO	386 Park Avenue South New York, New York 10016	Connected

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).

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Statement of Organization of a Committee

(Page 2)

RECEIVED
FEDERAL ELECTION
COMMISSION

U.S. GOVERNMENT PRINTING OFFICE: 1970 O - 354-633

79 MAY 21 AM 10:58

Name of Committee

N.Y.C. Central Labor Council Individual Fund

7 Area, Scope and Jurisdiction of Committee:

- (a) Will this committee operate in more than one State? Yes No
- (b) Will it operate on a statewide basis in one State? Yes No
- (c) Will it primarily support candidates seeking State or local office? Yes No
- (d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? Yes No

8 (a) 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
Robert Garcia	Citizens For A Responsive Congress 549 East 138th Street Bronx, New York 10454	House of Representatives	Democrat

(b) 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
Hugh Carey	Albany, New York	Governor	Democrat

9 If this committee is supporting the entire ticket of a party, give name of party ▶

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
Harry Avrutin	386 Park Avenue South New York, New York 10016	Treasurer

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).

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Statement of Organization of a Committee

(Page 3)

Federal Election Commission
1100 K Street, N.W.
Washington, D.C. 20463

Name of Committee **N.Y.C. Central Labor Council Individual Fund**

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
Christopher Plunkett	386 Park Avenue South New York, New York 10016	Chairman
Harry Avrutin	386 Park Avenue South New York, New York 10016	Treasurer

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? Contributed to N.Y.C. Central Labor Council COPE

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
Amalgamated Bank of N.Y.	11-15 Union Square New York, New York

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 430(a)):

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above where 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.

Harry Avrutin
(Signature of Treasurer)

5/18/79
(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 §441 (see instructions)

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

OCT 19 1979

Mr. Harry Avrutin, Treasurer
N.Y.C. Central Labor Council
Individual Fund
386 Park Avenue South
New York, New York 10016

Dear Mr. Avrutin:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of your Statement of Organization, we noted that you omitted certain information. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the registration forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Beverly Brown in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202) 357-0026.

Sincerely,

Orlando B. Potter
Staff Director

Attachment
FEC Form 11

79031100973
81040295453

Central Labor Council Individual
Fund

DATE: OCT 19 1979

I.D. NO.: C00109934

REQUEST FOR ADDITIONAL INFORMATION FOR YOUR STATEMENT OF ORGANIZATION OF A POLITICAL COMMITTEE, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the statement indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required information as indicated below (X):

Signature omitted incorrect
11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

Question 5 - Complete information for: (a) , (b) , (c) , (d) , (e) .
11 CFR 102.2(a)(1) requires the identity of not only the name and address of your committee but the type of committee. Please amend your statement accordingly.

Question 6 - Name(s) of Affiliated Committee(s) and/or Connected Organization (IF NONE, SO STATE)

11 CFR 100.14(c)(2) defines an "Affiliated Committee" as a committee (including a separate segregated fund) established, financed, maintained, or controlled by the same corporation, labor organization, person, or group of persons, including any parent, subsidiary, branch, division, department, or local unit thereof. Please amend your report accordingly.

11 CFR 100.15 defines "Connected Organization" as any organization which is not a political committee but which directly or indirectly establishes, administers, or financially supports the registrant such as corporation (including one without capital stock), a labor organization, a membership organization, a cooperative, or trade association. Please amend your report accordingly.

Name, address, state and party affiliation of individual candidates supported by the committee.

Name, address and position of the committee's custodian of books and accounts.

Name, address and position of principal officers of the committee omitted inadequate.
2 U.S.C. 432(a) requires each political committee to have a Chairman and a Treasurer. 11 CFR 102.7 further stipulates that the Treasurer and Chairman are not to be the same individuals, and that no contributions may be accepted or expenditures made when there is a vacancy in either office. Please amend your statement to identify the appropriate officers.

Name(s), location(s) of bank(s), repository(ies).
2 U.S.C. 433(b)(9) requires a listing of all banks, safety deposit boxes or other repositories used by the committee be disclosed. Please amend your statement to identify all repository(ies) authorized by the candidate for your use.

Other: Please see page 3.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone number is (202) 523-4018.

FOR ADDITIONAL INFORMATION

OCT 19 1979

Political committees established by the subordinate or local union of a national or international union are required to disclose the name and address of each political committee established by the international or national union.

Your committee identifies New York City Central Labor Council, AFL-CIO as your sponsoring organization. Since this is the local of AFL-CIO, you should amend your Statement of Organization to include the name of the international union as well as AFL-CIO COPE POLITICAL CONTRIBUTIONS COMMITTEE, established by the international union.

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81040295455



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 25, 1979

Mr. Harry Avrutin, Treasurer
N.Y.C. CENTRAL LABOR COUNCIL INDIVIDUAL FUND
386 Park Avenue South
New York, NY 10016

Dear Mr. Avrutin:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the January 31 Year End '78 Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Beverly Brown in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

871903012393549533

N.Y.C. CENTRAL LABOR COUNCIL

DATE: 7/25/79

INDIVIDUAL FUND

I.D. NO.: C00109934

REQUEST FOR ADDITIONAL INFORMATION FOR THE January 31 Year End REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 1/1/78 THROUGH 2/28/79, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

Coverage Dates: omitted or incorrect (See page 3)

Summary Page Line(s): Column(s): Totals: omitted or incorrect

Detailed Summary (Page 2) Line(s): Column(s): Totals: omitted or incorrect

Schedule Totals: disagree with Detailed Summary (Page 2) or omitted

Date(s): omitted or inadequate for Schedule(s) Line(s)

Full Name(s)/Mailing Address(es): omitted or inadequate for Schedule(s) A Line(s) 14a

Occupation/Principal Place(s) of Business: omitted or inadequate for Schedule(s) A Line(s) 14a

Election Designation: omitted or inadequate for Schedule(s) Line(s)

Aggregate Year-to-Date Totals: omitted or inadequate for Schedule(s) Line(s)

Nature or Purpose of Expenditure: omitted or inadequate for Schedule(s) Line(s)

Nature or Purpose of Receipt: omitted or inadequate for Schedule(s) Line(s)

Inadequate Description of: proceeds dates events location of Schedule

Signature: omitted inadequate

1: CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

Other: Please see the attached page.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

ADDITIONAL INFORMATION

CENTRAL LABOR COUNCIL INDIVIDUAL FUND

2 U.S.C. 434(c) requires reports to be cumulative for the calendar year. Please amend your January 31 Year End report by disclosing the activity from 1/1/78 through 12/31/78. The subsequent April 10 Quarterly report should disclose the activity from 1/1/79 through 3/31/79.

Section 104.10 of the Commission's Regulations requires committees, which have cash on hand at the time of registration, to disclose the source(s) of those funds. Please amend your report to provide the source(s) of the \$224.91 reported on Line 6 of the Summary Page.

On Schedule E for Line 23 of the Detailed Summary Page you disclose and independent expenditure in support of Robert Garcia. Please be advised that Schedule E must be notarized.

For future reporting, please be advised that your committee identification number is: C00109934.

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200-099:7



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 19, 1979

Harry Avrutin, Treasurer
N.Y.C. Central Labor Council
Individual Fund
386 Park Avenue South
New York, New York 10016

REFERENCE: January 31 Year End Report, 1978 1-1-79 ->

Dear Mr. Avrutin:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated July 25, 1979. That notice requested information essential to full public disclosure of your Federal election financial activity and to assure compliance with provisions of the Federal Election Campaign Act (the Act).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to take legal action to insure compliance with the Act.

If you should have any questions related to this matter, please contact Kevin Kelly on our toll free number (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Thomas J. Havelhorst
Assistant Staff Director
Reports Analysis Division

81040295459



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1157

Date Filmed 9/30/81 Camera No. --- 2

Cameraman JPC