



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1478

Date Filmed 6/17/83 Camera No. --- 2

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1478

FEDERAL ELECTION COMMISSION

- Internal Memo. - from Suzanne Callahan and Tom Whitehead to Kenneth Gross

- Routing Cards

- Documents relating to conciliation

- Objection Memos

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):

83040400118

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

Signed Maibeth Tausant
 Date 5/9/83



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 3, 1983

Margaret E. McCormick, Esquire
AFL-CIO Legal Department
Room 804
815 - 16th Street, N.W.
Washington, D.C. 20006

Re: MUR 1478

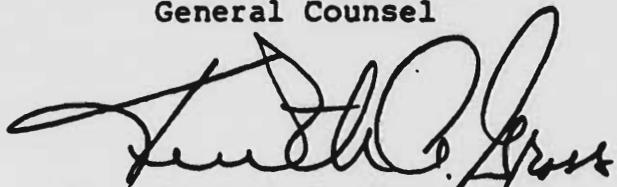
Dear Ms. McCormick:

On April 29, 1983, the Commission accepted the conciliation agreement signed by your clients, the United Paperworkers International Union Political Education Program and the United Paperworkers International Union, and a civil penalty in settlement of violations of 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended and 11 C.F.R. § 102.5(a)(1)(i). Accordingly, the file has been closed in this matter, and it will become a part of the public record within 30 days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Margaret E. McCormick, Esquire
AFL-CIO Legal Department
Room 804
815 - 16th Street, N.W.
Washington, D.C. 20006

Re: MUR 1478

Dear Ms. McCormick:

On April 29, 1983, the Commission accepted the conciliation agreement signed by your clients, the United Paperworkers International Union Political Education Program and the United Paperworkers International Union, and a civil penalty in settlement of violations of 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended and 11 C.F.R. § 102.5(a)(1)(i). Accordingly, the file has been closed in this matter, and it will become a part of the public record within 30 days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

MT
5/2/83

93040400120

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
United Paperworkers)
International Union and the) MUR 1478
United Paperworkers)
International Union Political)
Education Program)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Reason to believe has been found that the United Paperworkers International Union (hereinafter "the Union") and the United Paperworkers International Union Political Education Program (hereinafter "the Program") violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i), and that the Union violated 2 U.S.C. § 441b.

NOW THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(a)(i).

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

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III. Respondents enter voluntarily into this Agreement with the Commission.

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

1. The Program is a political committee registered with the Commission, and is the separate segregated fund of the Union.
2. The Union is an international labor organization.
3. The Program maintains two separate bank accounts, a voluntary account and a non-voluntary account. Local unions transmit voluntary contributions from their members and funds from their general treasury accounts to the Program's accounts on a regular basis. The voluntary account contains voluntary contributions from local unions' members and is used in connection with federal elections. The non-voluntary account contains union treasury funds and is used, in part, in connection with state and local elections.
4. Between December 26, 1979, and March 4, 1983, 25 undesignated transfers from local unions, which in fact represented voluntary contributions totalling \$3,488.80, were deposited into the non-voluntary account while the source of the funds was ascertained. When it was determined that the transfers represented voluntary contributions, amounts equal to the voluntary contributions deposited into the non-voluntary account

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were transferred to the voluntary account. In five instances the transfer to the voluntary account occurred on the same day as the initial deposit of voluntary contributions into the non-voluntary account, and all transfers to the voluntary account occurred within three months of the initial deposit of voluntary contributions into the non-voluntary account.

5. On December 16, 1981, a \$500 contribution was made from the non-voluntary account to the Citizens for David Obey Committee, a federal political committee. On December 7, 1982, a \$500 refund was made by the Citizens for David Obey Committee to the Program.

6. In April of 1981 the Program and the Union sponsored a luncheon in honor of Senator George Mitchell at the Sheraton-Carlton Hotel in Washington, D.C. On May 12, 1981, a disbursement was made from the non-voluntary account to the Sheraton-Carlton Hotel in the amount of \$830.54 in connection with the luncheon.

7. A disbursement of \$1,517.04 was made from the non-voluntary account on January 23, 1980, to the Maine Sunday Telegram, a general circulation newspaper, for the cost of a political advertisement addressed to Union members. The advertisement urged the election of precinct delegates supporting the presidency of Senator Edward Kennedy.

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V. 1. Respondents, the Program and the Union, violated 2 U.S.C. § 441b(a), which prohibits a labor organization from making a contribution or expenditure in connection with any election at which presidential and vice-presidential electors or a Senator or a Representative in Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices, when they commingled union treasury funds and voluntary contributions, as described in Paragraph IV(4) above.

2. Respondents, the Program and the Union, violated 11 C.F.R. § 102.5(a)(1)(i), which prohibits the transfer of funds to a federal account from any other account maintained by an organization for the purpose of financing activity in connection with non-federal elections, when transfers were made from the non-voluntary account to the voluntary account, as described in Paragraph IV(4) above.

3. Respondent, the Union, violated 2 U.S.C. § 441b(a) when it made a contribution to a federal political committee, as described in Paragraph IV(5) above.

4. Respondent, the Union, violated 2 U.S.C. § 441b when it paid the expenses of a luncheon for a federal candidate, as described in Paragraph IV(6) above.

5. Respondent, the Union, violated 2 U.S.C. § 441b(a) when it placed an advertisement in a general circulation newspaper urging the election of precinct delegates, as described

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in Paragraph IV(7) above.

VI. Respondents, the Program and the Union, will pay a civil penalty of One Thousand Seven Hundred and Seventy-Five Dollars (\$1,775) to the United States Treasurer, pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents will no longer transfer funds from the non-voluntary account into the voluntary account.

VIII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended. 2 U.S.C. § 431, et seq.

XI. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

X. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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XI. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

By: *Kenneth A. Gross* *May 2, 1983*
Kenneth A. Gross Date
Associate General Counsel

FOR THE UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL EDUCATION PROGRAM and THE UNITED PAPERWORKERS INTERNATIONAL UNION

Nicholas Vratarić *4/20/83*
Nicholas Vratarić Date
Secretary-Treasurer,
United Paperworkers
International Union

George O'Bea *4/21/83*
George O'Bea Date
Treasurer
United Paperworkers
International Union Political
Education Program

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American Federation of Labor and Congress of Industrial Organizations

515 Sixteenth Street, N.W.
Washington, D.C. 20005



Ms. Marybeth Tarrant
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington D.C. 20463



CERTIFIED
No. 110358
MAIL

RETURN RECEIPT REQUESTED

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 1478
United Paperworkers International)	
Union)	
United Paperworkers International)	
Union Political Education Program)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 29, 1983, the Commission decided by a vote of 6-0 to take the following actions in MUR 1478:

1. Accept the conciliation agreement signed by the respondents.
2. Close the file.
3. Approve the proposed letter as attached to the General Counsel's April 27, 1983 Memorandum to the Commission.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

4-29-83

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

4-27-83, 9:08
4-27-83, 11:00

83040400138



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 12, 1983

Margaret E. McCormick, Esquire
AFL-CIO Legal Department
Room 804
815 - 16th Street, N.W.
Washington, D.C. 20006

Re: MUR 1478

Dear Ms. McCormick:

On March 14, 1983, the Office of General Counsel received the request of your clients, the United Paperworkers International Union Political Education Program and the United Paperworkers International Union, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe; your clients' request pertained to all of the apparent violations involved in the instant matter.

Enclosed is a conciliation agreement which this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it to the Commission within ten days. I will then recommend that the Commission approve the agreement. Should there be no agreement within 30 days, the Office of General Counsel will proceed to a recommendation as to whether there is probable cause to believe violations have occurred.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Maura White, the staff member assigned to this matter, at 202-523-4057.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

83040400129



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Margaret E. McCormick, Esquire
AFL-CIO Legal Department
Room 804
815 - 16th Street, N.W.
Washington, D.C. 20006

Re: MUR 1478

Dear Ms. McCormick:

On March 14, 1983, the Office of General Counsel received the request of your clients, the United Paperworkers International Union Political Education Program and the United Paperworkers International Union, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe; your clients' request pertained to all of the apparent violations involved in the instant matter.

Enclosed is a conciliation agreement which this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it to the Commission within ten days. I will then recommend that the Commission approve the agreement. Should there be no agreement within 30 days, the Office of General Counsel will proceed to a recommendation as to whether there is probable cause to believe violations have occurred.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Maura White, the staff member assigned to this matter, at 202-523-4057.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General

Enclosure
Conciliation Agreement

83040400130

MW 4/11/83

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 1478
United Paperworkers)	
International Union)	
United Paperworkers)	
International Union)	
Political Education)	
Program)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 11, 1983, the Commission approved by a vote of 6-0 the proposed conciliation agreement and letter as submitted with the General Counsel's April 7, 1983 Memorandum to the Commission in the above-captioned matter.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

4-11-83

Date

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

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Received in Office of Commission Secretary:
 Circulated on 48 hour tally basis:

4-7-83, 11:56
 4-7-83, 4:00

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UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL EDUCATION PROGRAM

pep

WAYNE E. GLENN
President

GEORGE H. O'BEA, JR.
Vice President-National Director

NICHOLAS C. VRATARIC
Secretary-Treasurer

March 24, 1983

Ms. Maura White
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: FEC MUR 1478

Dear Maura:

The United Paperworkers International Union and the United Paperworkers International Union Political Education Program ("UPIU PEP") (hereinafter "Respondents") wish to correct certain information provided in Respondents' January 6, 1983 letter that was submitted to the Commission in connection with the above-referenced matter.

Specifically, page two of that letter states that in July of 1982 UPIU PEP ended its practice of depositing undesignated transfers into its non-voluntary account and subsequently transferring funds identified as voluntary contributions to its voluntary account. This statement was made on the basis of information provided at the time by Respondents' Nashville headquarters.

A more detailed review of UPIU PEP's financial records, however, subsequently revealed, as Respondents' March 14, 1983 reply to the Commission's interrogatory indicates, that the practice described above continued until March 4, 1983. The undersigned is advised that this occurred because of a change in UPIU PEP's personnel and a failure to adequately instruct those newly assigned to handling these matters on how to proceed.

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The more detailed review noted above shows also that this practice has now been ended and that, based on the recommendation of the FEC Reports Analysis Division, UPIU PEP is now in the process of establishing an escrow account to be used solely to deposit undesignated transfers in order to determine, within a ten day period, into which of UPIU PEPs accounts (voluntary or non-voluntary) those funds should be deposited.

Sincerely,

Margaret E. McCormick

Margaret E. McCormick
Counsel for Respondents

United Paperworkers International Union and
the United Paperworkers International
Union Political Education Program

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Legal
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Ms. Maura White
Office of the General Counsel
Federal Election Commission
1325 K St., N.W.
7th Floor
Wash., D.C.

BY MESSENGER

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GENERAL COUNSEL
FEDERAL ELECTION COMMISSION

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UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL EDUCATION PROGRAM

DEED

WAYNE E. GLENN
President

GEORGE H. O'BEA, JR.
Vice President-National Director

NICHOLAS C. VRATARIC
Secretary-Treasurer

104:27

March 14, 1983

Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: FEC MUR 1478

Dear Mr. Steele:

Attached is the sworn response of United Paperworkers International Union and the United Paperworkers International Union Political Education Program ("UPIU PEP") (hereinafter "Respondents"), to the written interrogatory which accompanies the Commission's letter dated February 14, 1983.

Accordingly, Respondents now request pre-probable cause conciliation with respect to the alleged violation described above, as well as the other alleged violations referred to in our letter of January 6, 1983.

It continues to be the position of Respondents, however, that the Commission should take no further action with regard to the contributions to nine federal candidates questioned in the Commission's November 19, 1982 letter since, as documented in our January 6, 1983 response, it is clear that those contributions were made from UPIU PEP's voluntary account.

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Please let me know if you have any questions concerning the attached information or our request for pre-probable cause conciliation. I can be reached at 202/637-5397.

Sincerely,

Margaret E. McCormick

Margaret E. McCormick
Counsel for Respondents,
United Paperworkers International Union
and United Paperworkers International
Union Political Education Program

Enclosure

83040400136

State of Tennessee)
) SS.:
County of Davidson)

NICHOLAS C. VRATARIC, being duly sworn, deposes and says:

Deponent is the Secretary-Treasurer of the United Paperworkers International Union, an unincorporated association; Deponent has read the foregoing attached listing of monies transferred in the Political Education Program funds and knows the contents thereof; the same is true to the deponent's own knowledge.

Nicholas C. Vratari
NICHOLAS C. VRATARIC

Sworn to before me this 9th
day of March, 1983.

Donald Sue Alexander
Notary Public

My Commission Expires Oct. 19, 1986

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<u>AMT.</u>	<u>DEP. IN EDUC.</u>	<u>TRANSFERRED TO VOLUN.</u>	<u>ED. CHECK NO.</u>
		<u>1980</u>	
70.00	12/26/79	2/15/80	326
5.00	5/28/80	5/28/80	329
		<u>1981</u>	
100.00	1/21/81	2/20/81	348
35.00	5/07/81	5/07/81	350
100.00	11/03/81	12/09/81	365
93.00	11/03/81	12/09/81	365
587.65	11/03/81	12/09/81	365
49.00	12/09/81	12/09/81	365
		<u>1982</u>	
287.00	2/09/82	2/17/82	1
81.00	2/17/82	2/17/82	1
146.00	2/09/82	3/02/82	102
365.00	3/02/82	3/15/82	103
17.00	6/07/82	6/07/82	107
14.00	6/25/82	6/30/82	108
182.50	6/25/82	6/30/82	109
78.50	6/25/82	8/25/82	119
170.00	8/17/82	9/21/82	126
112.00	6/25/82	9/21/82	127
316.00	8/25/82	10/08/82	131
212.00	9/21/82	10/08/82	132
125.00	10/07/82	10/08/82	133
27.00	11/17/82	12/31/82	156
		<u>1983</u>	
229.65	1/31/83	2/10/83	159
35.00	2/22/83	3/04/83	162
51.50	1/31/83	3/04/83	162

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 7, 1983

Margaret E. McCormick
AFL-CIO Legal Department
Room 804
815 - 16th Street, N.W.
Washington, D.C. 20006

Re: MUR 1478

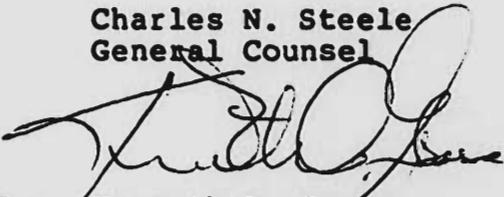
Dear Ms. McCormick:

This is in response to your letter dated March 3, 1983, in which you request a ten day extension of time to respond to the interrogatory issued to your clients, the United Paperworkers International Union and the United Paperworkers International Union Political Education Program. I have reviewed your request and agree to a ten day extension. The response of your clients is due, therefore, on March 14, 1983.

If you have any questions please contact Maura White at 523-4057.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

0304040133



UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL EDUCATION PROGRAM

pep

WAYNE E. GLENN
President

GEORGE H. O'BEA, JR.
Vice President-National Director

NICHOLAS C. VRATARIC
Secretary-Treasurer

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ALL: 42

March 3, 1983

Ms. Maura White
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: FEC MUR 1478

Dear Maura:

In connection with the above-referenced matter, the Commission has requested that my clients, the United Paperworkers International Union and the United Paperworkers International Union Political Education Program, furnish certain information to the General Counsel in response to the written interrogatory contained in the Commission's letter dated February 14, 1983, and received by me on February 17, 1983. That response is presently due on March 4, 1983.

This letter is to request an extension of that date to and including Monday, March 14, 1983. The basis for this request is that the information needed to respond to the Commission's interrogatory must be compiled from records which are located at the International's headquarters in Nashville, Tennessee, before being forwarded to Washington, D.C., for review by the National Director of PEP, Mr. George O'Bea, Jr. This process is already underway but cannot be completed by the present deadline of March 4, 1983.

Please let me know immediately whether the General Counsel's Office will grant this request. As you know, I can be reached at 202-637-5397.

Sincerely,

Margaret E. McCormick

Margaret E. McCormick
Counsel for Respondents

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Ms. Maura White
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 14, 1983

Margaret E. McCormick
AFL-CIO Legal Department
Room 804
815 - 16th Street, N.W.
Washington, D.C. 20006

Re: MUR 1478

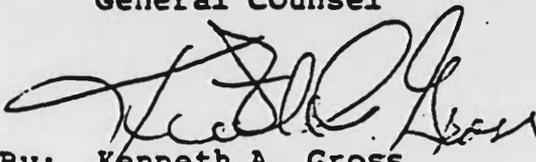
Dear Ms. McCormick:

On November 19, 1982, your clients, the United Paperworkers International Union ("the Union") and the United Paperworkers International Union Political Education Program ("PEP"), were notified that the Commission determined there was reason to believe they violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i), and that reason to believe had been found that the Union violated 2 U.S.C. § 441b with respect to several other issues. Your clients' response was submitted on January 6, 1983. It has been determined that additional information is necessary from your clients. Enclosed is an interrogatory which should be answered by your clients under oath, and submitted to this office within 15 days of your receipt of this letter.

If you have any questions please contact Maura White at 523-4057.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

83040100112



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Margaret E. McCormick
AFL-CIO Legal Department
Room 804
815 - 16th Street, N.W.
Washington, D.C. 20006

Re: MUR 1478

Dear Ms. McCormick:

On November 19, 1982, your clients, the United Paperworkers International Union ("the Union") and the United Paperworkers International Union Political Education Program ("PEP"), were notified that the Commission determined there was reason to believe they violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i), and that reason to believe had been found that the Union violated 2 U.S.C. § 441b with respect to several other issues. Your clients' response was submitted on January 6, 1983. It has been determined that additional information is necessary from your clients. Enclosed is an interrogatory which should be answered by your clients under oath, and submitted to this office within 15 days of your receipt of this letter.

If you have any questions please contact Maura White at 523-4057.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

18
2/10/83

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Interrogatory to the United Paperworkers International
Union Political Education Program (hereinafter "PEP")
and the United Paperworkers International Union
(hereinafter "the Union").

For each occurrence since January 1, 1980, through the present, state the amount of money representing voluntary contributions from local unions' members which was deposited into PEP's non-voluntary account, the date of deposit into PEP's non-voluntary account, and the date of the subsequent deposit/transfer into PEP's voluntary account.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
United Paperworkers International)	MUR 1478
Union; United Paperworkers International)	
Union Political Education Program)	

CERTIFICATION

I, Lena L. Stafford, Recording Secretary for the Federal Election Commission meeting on February 8, 1983, do hereby certify that the Commission decided in a vote of 5-1 to take the following actions with respect to the above-entitled matter:

1. Request from the United Paperworkers International Union Political Education Program and the United Paperworkers International Union the information set forth in Interrogative #1 attached to the General Counsel's Report signed January 28, 1983.

Commissioners Aikens, Harris, McDonald, McGarry, and Reiche voted affirmatively. Commissioner Elliott dissented.

Attest:

2-8-83
Date

Lena L. Stafford
Recording Secretary

83040400145

January 28, 1983

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1478

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

Attachment

cc: White

33040400142

RECEIVED
OFFICE OF THE
SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

83 JAN 28 All: 46

SENSITIVE

In the Matter of)

United Paperworkers International)
Union; United Paperworkers International)
Union Political Education Program)

MUR 1478

GENERAL COUNSEL'S REPORT

On November 16, 1982, the Commission determined that there is reason to believe that the United Paperworkers International Union Political Education Program ("PEP") and the United Paperworkers International Union ("the Union") violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i) by transferring funds from an account containing non-voluntary monies to an account containing voluntary monies. In addition, the Commission determined that the Union violated 2 U.S.C. § 441b in connection with a luncheon for Senator George Mitchell, 2 U.S.C. § 441b(a) by contributing to the Citizens for David Obey Committee, and 2 U.S.C. § 441b(a) in connection with a newspaper advertisement. Notifications of the Commission's findings were mailed to the respondents on November 19, 1982, and both PEP's and the Union's responses were submitted on January 6, 1983, after a 30 day extension of time to respond was granted. 1/

1/ Although not part of the Commission's RTB finding, it was unclear from PEP's reports which of its two accounts, voluntary or non-voluntary, was used to support nine other federal candidates during 1980. The respondents' January 6, 1983, response included documentation which demonstrates that the nine candidates were supported with funds from PEP's voluntary account.

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The response submitted by PEP and the Union admits that commingling of voluntary monies and general treasury funds occurred, but asserts that no further action should be taken because, inter alia, such commingling occurs only on an infrequent basis, and usually within seven to ten days after the deposit of voluntary funds into PEP's non-voluntary account the funds are transferred to PEP's voluntary account. 2/

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The First General Counsel's Report in the instant matter noted that after review of the reason to believe responses, this office would make a recommendation to the Commission as to the need for an audit. Although additional information should be obtained to determine the extent and frequency of commingling, and the circumstances surrounding the luncheon for Senator Mitchell, it is now the General Counsel's position that this

2/ The response states that this practice was ended in July 1982.

information can be obtained through interrogatories. In view of the minimal amount of information necessary to complete the factual record, an audit is neither necessary nor appropriate.

Recommendation

Approve the attached interrogatories and letter.

January 28, 1983
Date

Charles N. Steele
General Counsel

By:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachment
Interrogatories and letter

33040400149



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Margaret E. McCormick
AFL-CIO Legal Department
Room 804
815 - 16th Street, N.W.
Washington, D.C. 20006

Re: MUR 1478

Dear Ms. McCormick:

On November 19, 1982, your clients, the United Paperworkers International Union ("the Union") and the United Paperworkers International Union Political Education Program ("PEP"), were notified that the Commission determined there was reason to believe they violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a) (1)(i), and that reason to believe had been found that the Union violated 2 U.S.C. § 441b with respect to several other issues. Your clients' response was submitted on January 6, 1983. It has been determined that additional information is necessary from your clients. Enclosed are interrogatories which should be answered by your clients under oath, and submitted to this office within 15 days of your receipt of this letter.

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If you have any questions please contact Maura White at 523-4057.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure

Interrogatories to the United Paperworkers International
Union Political Education Program (hereinafter "PEP")
and the United Paperworkers International Union
(hereinafter "the Union").

1. For each occurrence since January 1, 1980, through the present, state the amount of money representing voluntary contributions from local unions' members which was deposited into PEP's non-voluntary account, the date of deposit into PEP's non-voluntary account, and the date of the subsequent deposit/transfer into PEP's voluntary account.

2. With respect to the luncheon sponsored by the Union on behalf of Senator George Mitchell in April of 1981 at the Sheraton-Carlton Hotel:

a. State whether the luncheon was conducted at the request of Senator Mitchell or the Mitchell for Senate Committee.

b. State whether individuals other than union members and their families attended the luncheon. If the answer is yes, state whether Senator Mitchell or the Mitchell for Senate Committee was aware or informed that such individuals would be in attendance.

c. State the purpose of the luncheon, and whether Senator Mitchell's candidacy was endorsed or otherwise supported by the Union or PEP at, or in connection with, the luncheon.

d. State whether contributions to Senator Mitchell's reelection campaign were solicited at, or in connection with, the luncheon.

e. State whether any materials prepared by the Mitchell for Senate Committee or its agents or Senator Mitchell, were distributed at the luncheon. If the answer is yes, describe all materials distributed.

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300# 9289



UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL EDUCATION PROGRAM

WAYNE E. GLENN
President

NICHOLAS C. VRATARIC
Secretary-Treasurer

GEORGE H. O'BEA, JR.
Vice President-National Director

January 6, 1983

Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: FEC MUR 1478

Dear Mr. Steele:

This letter constitutes the response of the United Paperworkers International Union ("UPIU") and the United Paperworkers International Union Political Education Program ("UPIU PEP") (hereinafter "respondents") to the Federal Election Commission's November 19, 1982, notice that the Commission had determined that there is reason to believe that respondents may have violated 2441b(a) of the Federal Election Campaign Act of 1971, as amended, and 11 CFR 102.5(a)(1)(i). Specifically, the Commission's letter alleges that respondents violated the Act by: (1) commingling voluntary and non-voluntary funds; (2) contributing monies from UPIU PEP's non-voluntary fund to a federal candidate(s); and (3) making disbursements from UPIU PEP's non-voluntary account for a luncheon honoring Senator Mitchell of Maine and a newspaper advertisement aimed at UPIU members.

Respondents' response to each of these alleged violations is set out below. Very briefly stated, respondents respectfully request, for the reasons stated in § 1 below, that the Commission take no further action with respect to the allegation that respondents have violated 2 USC §441b(a) and 11 CFR 102.5(a)(1)(i) by temporarily depositing undesignated transfers from UPIU locals into UPIU PEP's non-voluntary account and subsequently transferring those amounts which were determined to represent UPIU members' voluntary contributions to UPIU PEP's Voluntary Fund.

In addition, respondents request that the Commission take no further action with respect to the nine contributions to federal candidates discussed in §2 below, since it is documented that those contributions were made from UPIU PEP's voluntary account and accordingly were lawful under 2 USC 441b.

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1. Alleged Commingling Violation

As stated in the General Counsel's Factual and Legal Analysis respondent UPIU PEP has for some years maintained two separate segregated accounts — a voluntary account into which members' voluntary contributions to PEP are deposited and which is used in connection with federal elections and a non-voluntary account which contains union treasury funds and which is used to make contributions or expenditures for state and local elections and also to make certain disbursements which are specifically exempted from the FECA's definition of "contribution and expenditure" under 2 USC 441b(b)(2)(A)-(C).

UPIU local unions transmit voluntary contributions from their members and funds from their general accounts to both of these accounts on a regular basis. Infrequently, a local forgets to indicate whether the funds that it has transmitted to UPIU PEP represent voluntary contributions from UPIU members or a transfer of non-voluntary funds from the local itself. On those rare occasions, the UPIU PEP has in the past temporarily deposited such funds into PEP's non-voluntary account while ascertaining the source of the funds. As soon as that information was provided, usually within a week to 10 days, those funds which were determined to represent voluntary contributions from a local's members were immediately transferred into PEP's voluntary account. This practice was ended in July of 1982 when respondents were advised by the FEC's Report Analysis Division that funds may not, even in the circumstance just outlined, be transferred from its non-voluntary account into its voluntary account.

In essence, then, what UPIU PEP was doing was to follow the procedure outlined in 11 CFR 103.3(b)(1) for determining the legality of contributions, except that, the questioned contributions were temporarily deposited into PEP's non-voluntary account instead of its voluntary account as suggested by that regulation. It is submitted that since the temporary deposit of what are subsequently determined to be treasury money contributions into a voluntary separate segregated fund pursuant to §103.3(b)(1) does not constitute commingling in violation of 2 USC §441b(a) or 11 CFR §102.5(a)(1)(i), then the temporary deposit of undesignated funds subsequently determined to be voluntary contributions into a political committee's separate segregated non-voluntary account for the purpose of determining the legality of the funds should not be held to violate those provisions. The contrary result places form over substance, since in both instances voluntary and non-voluntary funds may be commingled for the short period of time it takes to discover the source of the contributions.

Indeed, the Commission has permitted the temporary commingling of voluntary contributions and treasury monies funds under other circumstances. For example, Commission has permitted combined payments of dues and voluntary political contributions to be deposited into a single transmittal account designed to separate the two types of funds in a timely manner. See FEC A.O. 1978-42, 1978-98, 1979-19, 1981-4. Similarly, in a recent advisory opinion, the Commission concluded that an organization's use of a single "Trust" account to both separate

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combined corporate dues payments and corporate contributions for state and local elections as well as to separate individual political contributions from dues payments would not violate §441b of the Act. FEC A.O. 1982-55.

Section 103.3(b)(1) of the FEC regulations and the advisory opinions cited above reflect a Commission policy in favor of permitting temporary commingling of treasury monies and voluntary political contributions where the purpose of that commingling is: "to insure that no contributions prohibited under the Act are forwarded to [an organization's] Federal account...". FEC Advisory Opinion 1982-55 at 4.

Since respondents' purpose in temporarily depositing undesignated funds into UPIU PEP's non-voluntary account was to ascertain whether or not the funds could lawfully be deposited into PEP's voluntary account, this action was consistent with the Commission policy described above. For this reason, respondents submit that UPIU PEP's practice should not be labelled a violation of the Act or the regulations. Accordingly, respondents respectfully request that the Commission take no further action with respect to this allegation.

2. Alleged Contributions to Federal Candidates from UPIU PEP's Non-voluntary Account.

The General Counsel's Factual and Legal Analysis states that a \$500.00 contribution to the Citizens for David Obey Committee was made from UPIU PEP's non-voluntary account. In addition, that document states that UPIU PEP's reports do not indicate which of the committee's two accounts was used to make contributions totalling \$5,400 to 9 federal candidates. These contributions were reported on Schedule B for line 21, page two of UPIU PEP's October 1980 quarterly report.

Taking the latter allegation first, the nine contributions in question were made from PEP's voluntary account. An amendment to UPIU PEP's 1980 October Quarterly report to this effect is attached hereto, as are xerox copies of the checks used to make those contributions.* You will note that each of those checks is drawn on the UPIU PEP Voluntary Fund account. See attachments 1 and 2.

Owing to an administrative error, Respondent's December 16, 1981 contribution in the amount of \$500.00 to the Citizens for David Obey Committee was made from UPIU PEP's non-voluntary account. At the direction of the Commission, PEP has requested and has received a full refund of the subject contribution from the Citizens for David Obey Committee. See attachment 3. In addition, new procedures are being implemented to insure that errors of this nature do not occur in the future.

3. Mitchell Luncheon

In April 1981, respondents sponsored a luncheon in honor of Senator George Mitchell of Maine. The luncheon was held at the Sheraton-Carlton Hotel in

*/ The contributions in question include: \$600.00 to the Cranston for Senate Dinner Committee, California, 8/1/80; \$400 to the Steve Soren for Congress, Iowa-2nd C.D., 8/19/80; \$400 to the Goyke for Congress Committee, Wisc. - 6CD, 8/19/80; \$500 to the Campaign Committee of Sen. Warren Magnuson, Washington, 8/19/80; \$1000 to the Birch Bayh for Senator Committee, Indiana, 9/10/80; \$1000 to the Durkin for U.S. Senate, New Hampshire, 9/10/80; \$500.00 to Dale Evans for Congress Committee, Indiana, 9/10/80; \$500.00 to the Baldus for Congress Committee.

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Washington, D.C. at a cost of \$830.34. The bill for the luncheon's expenses was subsequently transmitted to the UPIU headquarters in Nashville where, due to a misunderstanding of the FEC regulations pertaining to partisan communications (11 CRF 114.3), the bill was paid from UPIU PEP's non-voluntary account instead of, as should have been, out of the voluntary account.

Respondents' action in paying the Mitchell luncheon expenses from PEP's non-voluntary account was the result of a good faith mistake and not of an intent to violate the provisions of 2 USC 441b. Respondents have already undertaken, with the assistance of counsel, to develop guidelines based on the FEC regulations for UPIU PEP staff so as to ensure that a mistake of this nature does not occur again.

4. Maine Sunday Telegram Advertisement

As reflected in UPIU PEP's 1980 April Quarterly Report, sometime in January 1980, respondents purchased an advertisement in the Maine Sunday Telegram which was addressed to UPIU's Maine members and urged those members to elect precinct delegates at the Maine Democratic Party local caucuses. The advertisement cost \$1517.04, which amount was paid from UPIU PEP's non-voluntary account based on the mistaken but good faith belief that since the communication was addressed to UPIU members, it constituted an exempt internal communication pursuant to 2 US.C §441b(b)(2)(A) and hence could be financed out of treasury funds. Respondents now understand that the advertisement either should not have been placed in a newspaper of general circulation or alternatively, should have been paid for out of voluntary funds.

Respectfully submitted,

Margaret E. McCormick

Margaret E. McCormick
Attorney for Respondents

03040100153

SCHEDULE B

ITEMIZED DISBURSEMENTS

VOLUNTARY FUND

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

United Paperworkers International Union Political Education Program

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Cranston for Senate Dinner Committee 2019A Webster St. San Francisco, CA 94115	Re-election of Sen. Alan Cranston, California Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/1/80	600.00
B. Full Name, Mailing Address and ZIP Code Steve Sovern for Congress P. O. Box 529 Marion, IA 52302	Election to Senate, 2nd District, Iowa Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/19/80	400.00
C. Full Name, Mailing Address and ZIP Code Goyke for Congress P. O. Box 1114 Oshkosh, WI 54902	6th Congressional District, Wisconsin Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/19/80	400.00
D. Full Name, Mailing Address and ZIP Code Campaign Committee for Sen. Warren Magnuson P. O. Box 21407 Seattle, WA 98111	Re-election, state of Washington Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/19/80	500.00
E. Full Name, Mailing Address and ZIP Code Birch Bayh for Senator Committee P. O. Box 44491 Indianapolis, IN 46204	Re-election, state of Indiana Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/10/80	1,000.00
F. Full Name, Mailing Address and ZIP Code Durkin for U.S. Senate P. O. Box 1016 Manchester, NH 03105	Re-election, state of New Hampshire Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/10/80	1,000.00
G. Full Name, Mailing Address and ZIP Code Dave Evans for Congress Committee P. O. Box 41709B Indianapolis, IN 46241	Re-election, state of Indiana Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/10/80	500.00
H. Full Name, Mailing Address and ZIP Code Baldus for Congress Committee P. O. Box 41 Menominee, WI 54751	Al Baldus, 3rd Dist. Wisconsin Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/11/80	500.00
I. Full Name, Mailing Address and ZIP Code Wolpe for Congress Committee 246 E. Kilgore Kalamazoo, MI 49001	Re-election, state of Michigan Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/23/80	500.00
SUBTOTAL of Disbursements This Page (optional)			5,400.00
TOTAL This Period (last page this line number only)			

UNITED PAPER WORKERS INTERNATIONAL UNION
POLITICAL EDUCATION PROGRAM-VOLUNTARY FUND
163-83 HORACE HARDING EXPRESSWAY
FLUSHING, N.Y. 11365

134

PAY TO THE ORDER OF

PAID

Sept 10 1980

SEP 1 780

PAY \$100000 CTS DOLLARS

The *Amalgamated Bank of the City of New York*
1115 UNION SQUARE, NEW YORK, NEW YORK 10003
1-337

⑆0260⑉0337⑆ 01019801⑆

⑈0000⑈00000⑈

UNITED PAPER WORKERS INTERNATIONAL UNION
POLITICAL EDUCATION PROGRAM-VOLUNTARY FUND
163-83 HORACE HARDING EXPRESSWAY
FLUSHING, N.Y. 11365

136

PAY TO THE ORDER OF

PAID

Sept 10 1980

SEP 1 780

PAY \$100000 CTS DOLLARS

The *Amalgamated Bank of the City of New York*
1115 UNION SQUARE, NEW YORK, NEW YORK 10003
1-337

⑆0260⑉0337⑆ 01019801⑆

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UNITED PAPER WORKERS INTERNATIONAL UNION
POLITICAL EDUCATION PROGRAM-VOLUNTARY FUND
163-83 HORACE HARDING EXPRESSWAY
FLUSHING, N.Y. 11365

137

PAY TO THE ORDER OF

PAID

Sept 10 1980

SEP 2 360

PAY \$50000 CTS DOLLARS

The *Amalgamated Bank of the City of New York*
1115 UNION SQUARE, NEW YORK, NEW YORK 10003
1-337

⑆0260⑉0337⑆ 01019801⑆

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UNITED PAPER WORKERS INTERNATIONAL UNION
POLITICAL EDUCATION PROGRAM-VOLUNTARY FUND
163-83 HORACE HARDING EXPRESSWAY
FLUSHING, N.Y. 11365

138

PAY TO THE ORDER OF

PAID

Sept 10 1980

SEP 2 980

PAY \$50000 CTS DOLLARS

The *Amalgamated Bank of the City of New York*
1115 UNION SQUARE, NEW YORK, NEW YORK 10003
1-337

⑆0260⑉0337⑆ 01019801⑆

⑈00000⑈50000⑈

UNITED PAPER WORKERS INTERNATIONAL UNION
POLITICAL EDUCATION PROGRAM-VOLUNTARY FUND
163-83 HORACE HARDING EXPRESSWAY
FLUSHING, N.Y. 11365

139

PAY TO THE ORDER OF

PAID

Sept 23 1980

SEP 2 980

PAY \$50000 CTS DOLLARS

The *Amalgamated Bank of the City of New York*
1115 UNION SQUARE, NEW YORK, NEW YORK 10003
1-337

⑆0260⑉0337⑆ 01019801⑆

⑈00000⑈50000⑈

P.O. Box 411
Indanapolis, IN

P.O. Box 1514
MacArthur, TX

P.O. Box 41104
Indanapolis, IN

P.O. Box 21
MacArthur, TX

Volpe for Congress Comm
246 E. Kellogg
Kalamazoo, MI 49001

UNITED PAPER WORKERS INTERNATIONAL UNION
POLITICAL EDUCATION PROGRAM-VOLUNTARY FUND
163-63 HORACE HARDING EXPRESSWAY
FLUSHING, N.Y. 11365

130

August 1 1980

1-337-60

212 A Webster St.
San Francisco, CA

PAY TO THE
ORDER OF

Cranston, Rhode Island

600.00

PAID

PAYED 600 00 CTS

DOLLARS

AUG 2 580

The International Union of Paper Workers
11-18 UNION SQUARE NEW YORK, NEW YORK 10003

⑆0260⑉0337⑆ 06019801⑆

⑆0000060000⑆

UNITED PAPER WORKERS INTERNATIONAL UNION
POLITICAL EDUCATION PROGRAM-VOLUNTARY FUND
163-63 HORACE HARDING EXPRESSWAY
FLUSHING, N.Y. 11365

132

August 1982

1-337-60

Opp. North, No 10
C.O. 1502 117 59902
Chestnut St. Phila

PAY TO THE
ORDER OF

St. Louis, Missouri

\$700.00

PAID

PAYED 700 00 CTS

DOLLARS

SEP 1 080

The International Union of Paper Workers
11-18 UNION SQUARE NEW YORK, NEW YORK 10003

⑆0260⑉0337⑆ 06019801⑆

⑆0000040000⑆

UNITED PAPER WORKERS INTERNATIONAL UNION
POLITICAL EDUCATION PROGRAM-VOLUNTARY FUND
163-63 HORACE HARDING EXPRESSWAY
FLUSHING, N.Y. 11365

131

August 1982

1-337-60

Chicago for...
P.O. Box 5282
Washington DC

PAY TO THE
ORDER OF

Washington, D.C.

\$700.00

PAID

PAYED 700 00 CTS

DOLLARS

SEP 1 580

The International Union of Paper Workers
11-18 UNION SQUARE NEW YORK, NEW YORK 10003

⑆0260⑉0337⑆ 06019801⑆

⑆0000040000⑆

UNITED PAPER WORKERS INTERNATIONAL UNION
POLITICAL EDUCATION PROGRAM-VOLUNTARY FUND
163-63 HORACE HARDING EXPRESSWAY
FLUSHING, N.Y. 11365

133

August 1982

1-337-60

Washington DC
P.O. Box 5282

PAY TO THE
ORDER OF

Washington, D.C.

\$500.00

PAID

PAYED 500 00 CTS

DOLLARS

SEP 0 80

The International Union of Paper Workers
11-18 UNION SQUARE NEW YORK, NEW YORK 10003

⑆0260⑉0337⑆ 06019801⑆

⑆0000050000⑆

JOHN SLABY, Phillips
Chairperson

Citizens for
Dave Obey
Committee

P. O. Box 1322
Wausau, Wisconsin 54401

December 7, 1982

Mr. George O'Bea, Vice President
United Paperworkers International Union - PEP
Room 304
815 16th Street N.W.
Washington, D.C. 20006

Dear Mr. O'Bea:

Enclosed please find a check in the amount of \$500 which represents a refund of the United Paperworkers International Union PEP's December 16, 1981 contribution to the Citizens for Dave Obey Committee.

Yours truly,

John F. Spencer
John F. Spencer
Treasurer

enc.

33040400159

CP:CP 9/11/82

CITIZENS FOR DAVE OBEY COMMITTEE
CAMPAIGN FUND
812 N. 9TH AVE.
WAUSAU, WIS. 54401

1609

Dec. 7 19 82

79-1181/789

PAY TO THE ORDER OF UPIU-PEP

\$ 500.00

Five hundred dollars and no/100-----DOLLARS

PEOPLES STATE BANK



WAUSAU,
WISCONSIN

MEMO

John F. Spencer

⑆075911616⑆

110⑆998⑆

33040400160



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 9, 1982

Margaret E. McCormick
AFL-CIO Legal Department
Room 804
815 - 16th Street, N.W.
Washington, D.C. 20006

Re: MUR 1478

Dear Ms. McCormick:

This is in response to your letter dated December 6, 1982, requesting a 30 day extension of time to respond to the Commission's reason to believe findings against your clients, the United Paperworkers International Union Political Education Program and the United Paperworkers International Union. I have reviewed your request and agree to a 30 day extension. The responses of your clients are due, therefore, on January 6, 1983.

If you have any questions please contact Maura White at 523-4057.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in cursive script, which appears to read "Kenneth A. Gross", is written over the typed name.

By: Kenneth A. Gross
Associate General Counsel

33040400151

MAILGRAM SERVICE CENTER
MIDDLETOWN, VA. 22645

Western Union Mailgram



4-022548A337 12/03/82 ICS IPMMOZC MTN WSHB
00825 6092342900 MOORESTOWN NJ 12-03 0800P EST

2 DEC 7 P12:08

MAURA WHITE
OFFICE OF THE GENRAL COUNSEL
FEDERAL ELECTION COMMITTEE
1325 K ST NORTHWEST
WASHINGTON DC 20463

DUPE OF TELEPHONED TELEGRAM
1-006865I337 12-03 1145 TLX UIU NAS NASHVILLE TN 12-03 1145A EST

I WANT TO NOTIFY YOU THAT MARGARET E. MCCORMICK
IS HEREBY DESIGNATED AS THE UNITED PAPERWORKERS INTERNATIONAL UNION
POLITICAL EDUCATION PROGRAM, IS COUNSEL IN F.E.C.
MUR 1478 . SHE IS AUTHORIZED TO RECEIVE ANY NOTIFICATIONS OR
COMMUNICATIONS FROM THE COMMISSION AND TO ACT ON THE COMMITTEE'S
BEHALF BEFORE THE COMMISSION. HER ADDRESS IS ROOM 804 AFL-CIO
LEGAL DEPARTMENT, 815 16TH ST. NW , WASHINGTON DC. HER
TELEPHONE NUMBER IS 202-6375397.
NICHOLAS C. VRATARIC, SECRETARY-TREASURER
UNITED PAPERWORKERS INTERNATIONAL UNION
DSA

22:21 EST

MGHCOMP

63



RECEIVED AT

02 DEC 7

MAILGRAM
Postal Charge
PAD
Western Union

Western Union **Mailgram**



THIS MAILGRAM MESSAGE WAS TRANSMITTED ELECTRONICALLY BY WESTERN UNION TO A POST OFFICE NEAR YOU FOR DELIVERY

83040



6cc# 9049

American Federation of Labor and Congress of Industrial Organizations



815 Sixteenth Street, N.W.
Washington, D.C. 20006
(202) 637-5000

EXECUTIVE COUNCIL

LANE KIRKLAND PRESIDENT THOMAS R. DONAHUE SECRETARY-TREASURER

John H. Lyons
S. Frank Rafferty
Albert Shanker
Edward T. Hanley
J. C. Turner
Kenneth T. Slaylock
William H. Wynn
Wayne E. Glenn
Joyce D. Miller
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Richard I. Kilroy

Thomas W. Gleason
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John J. Sweeney
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Vincent R. Sombrotto

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David J. Fitzmaurice
Wm. W. Winpisinger
John DeConcini
William Konyha
Douglas A. Fraser
Barbara Hutchinson
Gerald W. McEntee

December 6, 1982

Ms. Maura White
Office of the General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Re: FEC MUR 1478

Dear Maura:

As the attached statement indicates, I have just been designated as the counsel for the United Paperworkers International Union and the United Paperworkers International Union Political Education Program (hereinafter "respondents") in the above-referenced matter. Respondents' reply to the Federal Election Commission's November 19, 1982 notice that the Commission has determined that there is reason to believe that respondents have violated the Federal Election Campaign Act of 1971, as amended, is presently due on December 7, 1982. This letter is to request an extension of that date to and including Thursday, January 6, 1983. The basis for this request is that due to the number and nature of the alleged violations cited in the Commission's reason-to-believe notice, it will be necessary for me to review a substantial number of documents (including the Political Education Program's 1980 and 1981 FEC reports and amendments thereto) prior to preparing a response. All of these documents are presently located in Nashville, Tennessee, and must be sent to Washington before such review can begin. It would thus be impossible for me to meet the present deadline for respondents' reply to the Commission's reason-to-believe notice.

Please notify me immediately whether the General Counsel will grant this request. I can be reached at 637-5397.

Sincerely,

Margaret E. McCormick

Margaret E. McCormick

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21100 54:02



pep

UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL EDUCATION PROGRAM

WAYNE E. GLENN
President

GEORGE H. O'BEA, JR.
Vice President-National Director

NICHOLAS C. VRATARIC
Secretary-Treasurer

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: Margaret E. McCormick, Esq.

ADDRESS: Room 804, AFL-CIO, 815 Sixteenth Street, N.W.
Washington, D.C. 20006

TELEPHONE: 202/637-5397 (office) 301/656-9612 (home)

The above-named individual is hereby designated as Counsel for the United Paperworkers International Union and the United Paperworkers International Union Political Education Program in F.E.C. MUR 1478. Ms. McCormick is authorized to receive any notifications and other communications from the Commission and to act on behalf of the United Paperworkers International Union and its Political Education Program (PEP) before the Commission.

Dec-6-1982
Date

George O'Bea Jr.
Signature

NAME: George H. O'Bea, Jr.

ADDRESS: 815 16th Street, N.W.
Washington, D.C. 20006

HOME PHONE: 703/860-8399

BUSINESS PHONE: 202/783-5238

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 19, 1982

Wayne E. Glenn, President
United Paperworkers International Union
702 Church Street
P.O. Box 1475
Nashville, Tennessee 37202

Re: MUR 1478

Dear Mr. Glenn:

On November 16, 1982, the Federal Election Commission determined that there is reason to believe that the United Paperworkers International Union violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), and 11 C.F.R. § 102.5(a)(1)(i). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against the Union, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel,

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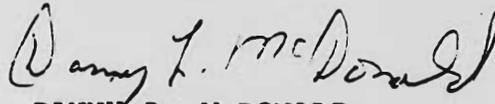
Letter to Wayne E. Glenn
Page 2

and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be 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.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Maura White, the staff member assigned to this matter, at 202-523-4057.

Sincerely,



DANNY L. McDONALD
Vice Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT United Paperworkers International
Union

MUR 1478
STAFF MEMBER
& TEL. NO.
White
202-523-4057

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

SUMMARY OF ALLEGATIONS

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This matter involves the commingling of voluntary and non-voluntary funds by the United Paperworkers International Union Political Education Program ("PEP") and the United Paperworkers International Union ("U.P.I.U.") in violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i), a contribution to a federal candidate by the U.P.I.U. in violation of 2 U.S.C. § 441b(a), and a violation of 2 U.S.C. § 441b(a) by the U.P.I.U. in connection with an advertisement in the Maine Sunday Telegram.

FACTUAL AND LEGAL ANALYSIS

1. The Facts

(a) Commingling of Voluntary and Non-Voluntary Funds

The 1980 October Quarterly Report of PEP disclosed a contribution to the Committee on Political Education, AFL-CIO,

on September 26, 1980, which totalled \$25,000. 1/ A Request for Additional Information ("RFAI"), questioning whether this constituted an excessive contribution, was mailed to PEP on August 26, 1981, and a second notice was sent on September 18, 1981. In a response dated September 23, 1981, PEP's treasurer stated that the contribution was made through secretarial error from PEP's funds, instead of the union's general fund, and that the \$25,000 would be reimbursed to PEP from the union's general fund.

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A telephone conversation was initiated by a staff member of the Reports Analysis Division on October 6, 1981, to inform the treasurer that the transfer of funds described in his September 23, 1981, letter was impermissible, since voluntary and non-voluntary dollars would be commingled. The treasurer stated that voluntary and non-voluntary dollars would not be commingled in that the transfer from the union's general account to PEP would be deposited in their educational/treasury ("non-voluntary") account. He explained that PEP maintains two bank accounts, a non-voluntary account and a voluntary account, and that voluntary contributions from local unions' members are deposited into the voluntary account.

1/ The \$25,000 contribution to the AFL-CIO COPE was not reported by the AFL-CIO's registered political committee as being received and appears to have been designated to a non-Federal educational account.

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An additional amendment to the October Quarterly Report, dated October 7, 1981, confirmed the existence of the voluntary and non-voluntary accounts maintained by PEP. 2/ The response explained that the two funds are kept in separate bank accounts, and copies of blank checks evidencing the existence of the two accounts were submitted. The letter also stated that any money which is received but which is not clearly spelled out as voluntary money is automatically put into the educational account ("non-voluntary"), and the two accounts are not commingled. (But see below).

On October 15, 1981, PEP's treasurer was informed by telephone by staff of the Reports Analysis Division that it would not be necessary to continue reporting the activity of the non-voluntary account, and that the 1981 Year End Report should not include this activity. On November 4, 1981, an RFAI was sent on the amended October Quarterly Report to obtain more specific information on the usage of the non-voluntary account. In addition, RFAI's were sent on the 1980 July Quarterly, 30 Day Post-General and amended Year End Reports to request the proper categorization of receipts. Responses were not received and,

2/ According to the treasurer, the amendment "shows a deletion of the \$25,000 contribution issued to COPE." The treasurer further explained that while "the Union Executive Board voted to make a contribution of \$25,000 to COPE out of the Union's General Fund for educational purposes," the check was erroneously "issued on the UPIU Political Education Program from its Educational Account (non-voluntary)." Included with the response was a copy of a \$25,000 check, dated September 25, 1981, drawn on the account of the United Paperworkers International Union ("U.P.I.U."), and payable to the Political Education Program.

therefore, a second notice was mailed on November 27, 1981, for all four reports.

PEP submitted additional amendments for the 1980 July Quarterly, October Quarterly, 30 Day Post-General and Year End Reports on February 16, 1982. The receipt of non-voluntary funds was reported separately on Line 17 ("other receipts"), and supporting Schedule B's for Line 21 ("contributions to federal candidates and other political committees") were amended to show which disbursements were made from the non-voluntary account and voluntary account. However, PEP did not specifically note on Schedule B for Line 21, Page 2 of the October Quarterly Report, which account was used to make contributions to nine federal candidates totalling \$5,400. ^{3/} Furthermore, PEP did not clarify whether other reports disclosed activity from both accounts.

The three reports filed by PEP during 1981, the Mid-Year Report (1/1/81 - 6/30/81), October 15 Report (6/30/81 - 9/30/81), and the Year-End Report (10/1/81 - 12/31/81), included the activity of both of PEP's accounts. The Year-End Report also disclosed a \$500 contribution to the Citizens for David Obey Committee (candidate for U.S. Congress, 7th District of Wisconsin) from PEP's non-voluntary account, dated December 16,

^{3/} A letter accompanying the 1980 October Quarterly amendment stated that with respect to the filing, the receipts had been separated according to the two funds and that "[a]ll funds deposited in both accounts have been deposited and disbursed in accordance with the FEC regulations."

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1981. 4/

The 1982 April Quarterly Report disclosed receipts and disbursements of the non-voluntary account, including a discrepancy between the beginning cash figure of this report and the ending cash figure of the Year End Report. On June 30, 1982, RFAI's were sent to PEP regarding its 1981-82 reports which, among other things, advised the committee to delete the non-voluntary account from its reports, and to request a full refund from the Citizens for David Obey Committee because the contribution to that committee appeared to have been made from PEP's non-voluntary account.

On July 9, 1982, a representative of PEP called to seek clarification regarding the RFAI's. During the conversation, the representative stated that the contribution to the Citizens for David Obey Committee was erroneously made from the non-voluntary fund, and that the discrepancy between cash-on-hand figures was a result of PEP's accounting system for depositing transfers from local unions. With respect to the latter point, the representative explained that undesignated transfers from local unions are deposited into the non-voluntary account. A transfer to the voluntary account is made if it is subsequently determined that the funds were intended to be designated for the voluntary account. In addition, the representative stated that rather

4/ The Citizens for David Obey Committee reported the receipt of a \$500 contribution from PEP on December 22, 1981.

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than requesting a refund of \$500 from the Citizens for David Obey Committee, PEP would prefer to transfer \$500 from the voluntary to the non-voluntary account.

Staff of the Reports Analysis Division initiated a follow-up conversation with PEP representatives on July 12, 1982, in order to suggest procedures for rectifying the problems, and recommended that an escrow account be established for the purpose of depositing undesignated transfers from local unions which would provide PEP with a ten day period to determine into which account (i.e., voluntary or non-voluntary) the funds should be deposited. PEP was also advised that instead of transferring \$500 from the voluntary to the non-voluntary account, it should seek a refund of the contribution directly from the Citizens for David Obey Committee.

Amendments to the 1981-82 reports were received at the Commission on July 20, 1982. As suggested in the RFAI's, the non-voluntary account activity was deleted from PEP's reports. After deleting the activity of this account, PEP's 1981 July Quarterly Report no longer reflects a disbursement (\$830.54) to the Sheraton-Carlton Hotel on May 21, 1981, for a "luncheon for Sen. George Mitchell, Maine," thereby suggesting that this disbursement was made from PEP's non-voluntary account.

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(b) Disbursements related to Senator Kennedy's Presidential bid.

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The 1980 April Quarterly and July Quarterly Reports of PEP reported five disbursements apparently related to Senator Kennedy's Presidential campaign. One of the disbursements, dated January 8, 1980, is reported as a direct \$2,000 contribution to the Kennedy for President Committee. The other disbursements were reported as follows: \$1,517.04 on January 23, 1980, to "Maine Sunday Telegram, Kennedy Campaign Headquarters, 13 Columbia Street, Augusta, Maine," for "cost of political ad in support of Kennedy sent to our members"; \$500 on February 22, 1980, to "UPIU Local 75 Labor Committee for Kennedy" for "support for Ted Kennedy"; \$3,000 on April 22, 1980, to the U.A.W. International Union for "New Hampshire Labor for Kennedy Literature"; and, \$237 on April 16, 1980, to Bronwal Printing for "Kennedy Four Point Brochure for our members in Illinois."

On June 17, 1981, the Reports Analysis Division mailed an RFAI to PEP which notified them that the five disbursements discussed above, when aggregated, appeared to exceed the limits of 2 U.S.C. § 441a. The RFAI noted that some of the "expenditures appear to be made on behalf of Senator Kennedy's Presidential Campaign as contributions in-kind advocating the election of a clearly identified candidate." By letter dated June 25, 1981, the treasurer

of PEP responded to the RFAI and described in greater detail the purpose of four of the disbursements and suggested that they constitute communication costs which are exempt from the definition of contribution and expenditure pursuant to 11 C.F.R. § 114.1(a). With respect to the disbursement to the U.A.W. International Union, the treasurer stated that several unions jointly printed some literature for distribution to their respective members, and that it was not given to any committee. The disbursement to Bronwal Printing was explained as "the printing of a letter sent to U.P.I.U. members only in Illinois," and the disbursement to the Maine Sunday Telegram as "an advertisement taken out addressed to U.P.I.U. members urging them to elect precinct delegates." Finally, the disbursement to U.P.I.U. Local 75 was described as being "strictly used for transporting our (U.P.I.U.) members to the polls." On October 14, 1981, the director of PEP informed a staff member of the Reports Analysis Division by telephone that the communication costs disclosed in PEP's reports had been paid for with non-voluntary funds. An amendment to PEP's July 15, 1980, Quarterly Report (filed on February 16, 1982), however, lists the disbursement to Bronwal Printing (\$237) as having been made from PEP's voluntary account. 5/

5/ The amendment reported the \$3,000 disbursement to the U.A.W. International Union on April 22, 1980, as having been drawn on the non-voluntary account.

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2. The law applicable

A political committee which finances activity in connection with both federal and non-federal elections may establish a separate federal account into which only funds subject to the prohibitions and limitations of the Act may be deposited. All disbursements, contributions, expenditures and transfers by the committee in connection with any federal election shall be made from its federal account. No transfers may be made to such federal account from any other account maintained by such organization for the purpose of financing activity in connection with non-federal elections. 11 C.F.R. § 102.5(a)(1)(i).

Pursuant to 2 U.S.C. § 441b(a), a labor organization may not make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or a Representative in Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices.

For purposes of 2 U.S.C. § 441b(a), the term "contribution or expenditure" is defined at 2 U.S.C. § 441b(b)(2) and 11 C.F.R. § 114.1(a)(1) to include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money or anything of value to any candidate, campaign committee, political party or committee, organization, or any other person in

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connection with a federal election. The term "contribution or expenditure" does not include communications by a labor organization to its members on any subject. 2 U.S.C. § 441b(b) (2) (A) and 11 C.F.R. § 114.1(a) (2) (i).

Section 431(9) (B) (iii) of Title 2, United States Code, provides that the term "expenditure" does not include any communication by any membership organization to its members if such membership organization is not organized primarily for the purpose of influencing the nomination for election, or election, of any individual to Federal office, except that the costs incurred by a membership organization (including a labor organization) directly attributable to a communication expressly advocating the election or defeat of a clearly identified candidate (other than a communication devoted to subjects other than the express advocacy of the election or defeat of a clearly identified candidate), shall, if such costs exceed \$2,000 for any election, be reported to the Commission in accordance with 2 U.S.C. § 434(a) (4) (A) (i).

As set forth at 11 C.F.R. § 114.3(a), a labor organization may make partisan communications in connection with a federal election to its members and their families. The manner in which partisan communications may be made includes, but is not limited to, the distribution of printed material of a partisan nature

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by a labor organization to its members and their families, provided that the material is produced at the expense of the labor organization or its separate segregated fund, and that the material constitutes a communication of the views of the labor organization and is not simply the republication or reproduction in whole or in part, of any broadcast transcript or tape or any written, graphic, or other form of campaign materials prepared by the candidate, his or her campaign committees, or their authorized agents. 11 C.F.R. § 114.3(c) (1) (i) and (ii).

Partisan communications may also include a labor organization's transportation of its members and their families to the polls. 11 C.F.R. § 114.3(c) (4).

The term "contribution" is defined at 2 U.S.C. § 431(8) (A) to include any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. The term "expenditure" is defined at 2 U.S.C. § 431(9) (A) to include any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for federal office.

As set forth at 2 U.S.C. § 441a(a) (2) (A) no multicandidate political committee shall made contributions to any candidate and his authorized political committees with respect to any election for federal office which, in the aggregate, exceed \$5,000.

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3. Application of the law to the commingling problem.

The first issue involved herein, concerning the commingling of funds, arises from the fact that PEP maintains two accounts -- a voluntary account, which is used to finance federal elections, and a non-voluntary account which appears to be used in substantial part to support state and local candidates. While PEP may maintain two separate accounts, PEP may not transfer funds from its non-voluntary account into its voluntary account. PEP, however, uses its non-voluntary account as an informal "escrow" account to hold funds from local unions' members which are undesignated; if it is subsequently determined that the funds represent voluntary contributions, they are transferred to the voluntary account. Such activity constitutes the commingling of union and voluntary funds and the impermissible transference of funds, in violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i). As PEP has been reporting the activity of both of its accounts since at least 1980, this commingling would seem to have commenced sometime prior to 1980, and appears to be current practice as well. Hence, the General Counsel recommends that the Commission find reason to believe that the U.P.I.U. and PEP have violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i).

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4. Application of the law to the disbursements to candidates from the non-voluntary account

The information available thus far indicates that the non-voluntary account of PEP was used to contribute to at least one federal candidate, David Obey. Which of PEP's two accounts was used to support nine other federal candidates is not known. PEP has acknowledged that its non-voluntary account was the source of the funds which were contributed to the Obey campaign. Although PEP has offered to transfer an amount equal to the Obey contribution from its voluntary account to its non-voluntary account, it is not clear whether such has occurred. (PEP has not reported a refund from Citizens for David Obey). It is the position of the General Counsel that the refund of the contribution or the transfer of funds between PEP's two accounts, would serve only to mitigate the violation. In that the non-voluntary account is comprised of union funds and such funds were contributed to the Obey campaign, there is reason to believe, in the General Counsel's view, that the U.P.I.U. violated 2 U.S.C. § 441b(a).

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With regard to the disbursement from the non-voluntary fund for a luncheon for Senator Mitchell, the Commission determined that there is reason to believe that the U.P.I.U. violated 2 U.S.C. § 441b by making a contribution in connection with a federal election. Although the Mitchell for Senate Committee did not report the receipt of an in-kind contribution from PEP, Senator Mitchell was an announced candidate at the time of the luncheon.

5. Application of the law to the \$25,000 transfers.

As to the initial transfer of \$25,000 to the AFL-CIO COPE from PEP, such a transfer appears to have been permissible as the \$25,000 was drawn on the non-voluntary account of PEP and did not go to the separate segregated fund of the AFL-CIO. The subsequent reimbursement made by the U.P.I.U. to PEP also appears to have been permissible since the funds were deposited into PEP's non-voluntary account.

6. Application of the law to the disbursements in connection with the presidential campaign of Senator Kennedy

Although contradictory information has been provided by PEP, PEP appears to have made disbursements from both its voluntary and non-voluntary account in connection with Senator Kennedy's presidential bid. In the General Counsel's view, the disbursements from PEP's voluntary account were permissible, and one of the three disbursements from the non-voluntary account was not.

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As discussed above, PEP used its voluntary account to make a direct contribution to the Kennedy campaign (\$2,000) and to pay (\$237) for the distribution of pro-Kennedy literature to U.P.I.U. members. The General Counsel's position as to the permissibility of these disbursements, reflects the apparent fact that PEP's \$5,000 contribution limitation to the 1980 Kennedy campaign had not been exceeded and that only funds subject to the limitations and prohibitions of the Act were used for these disbursements. 6/ While it is clear that PEP made a "contribution" pursuant to 2 U.S.C. § 431(8)(A) of \$2,000 and such counts against its contribution limitation, there is no evidence at this juncture that there was any coordination with the Kennedy campaign regarding the \$237 disbursement and that it is therefore subject to limitation as an in-kind contribution. In any event, PEP's contribution limitation would still not have been exceeded. Nor is there any evidence at this juncture that the \$237 disbursement involved "express advocacy" such that it would have to be reported by PEP on Schedule E rather than Schedule B. The disbursement was in fact reported.

With respect to the three disbursements relating to Senator Kennedy's candidacy which were made from PEP's non-voluntary

6/ PEP was a qualified multicandidate committee at the time the contribution involved herein was made.

The FEC "G" Index of the Kennedy for President Committee lists the receipt of only a \$2,000 contribution from PEP, and a review of PEP's reports did not reveal any other contributions to the Kennedy for President Committee.

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account containing union funds, PEP claims that the disbursements were used to finance communications to U.P.I.U. members and that they therefore are not subject to the limitations of 2 U.S.C. § 441b(a). While the disbursements to the U.A.W. International Union and to U.P.I.U. Local #75 appear to have been for exempt partisan communications pursuant to 2 U.S.C. § 441b(b) (2) (A) and 11 C.F.R. § 114.3(a) 7/, it is the view of the General Counsel that there is reason to believe that the third disbursement at issue, apparently to the Maine Sunday Telegram, involves a violation of 2 U.S.C. § 441b(a) by the U.P.I.U.

Two factors are involved herein -- whether the disbursement to the Maine Sunday Telegram is in fact "in connection with any primary election or political convention or caucus held to select candidates" under 2 U.S.C. § 441b(a), and, if so, whether it should be considered exempt from the definition of expenditure pursuant to 2 U.S.C. § 441b(b) (2) (A). The disbursement to the Maine Sunday Telegram apparently financed an ad which urged the election of precinct delegates supporting Senator Kennedy. 8/

7/ These disbursements were for the distribution of pro-Kennedy literature to U.P.I.U. members, and the transportation of U.P.I.U. members to the polls.

8/ PEP's initial reporting of this disbursement listed the purpose as the "cost of a political ad in support of Kennedy sent to our members." It was the June 25, 1981, letter from the treasurer that described this as "an advertisement taken out addressed to U.P.I.U. members urging them to elect precinct delegates."

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In Maine the Democratic Party is structured such that precinct delegates, upon election at the local caucuses, proceed to the state convention where they elect delegates to the national nominating convention. ^{9/} The term "primary election" is defined at 11 C.F.R. § 100.2(c) (3) to include "an election which is held to select delegates to a national nominating convention." Since the precinct delegate elections select delegates to the state democratic convention in Maine which, in turn, will select delegates to the national nominating convention which has authority to nominate a presidential candidate, the U.P.I.U.'s payment for an ad urging the election of precinct delegates is a payment made "in connection with any primary election or political convention or caucus held to select candidate," in the General Counsel's view. See Advisory Opinion 1979-7, 1 Federal Election Campaign Financing Guide (CCH) ¶ 5396, at 10,408 (1979) (payments by corporation or labor organization for an "Affirmative Action Program" in selecting delegates to the national nominating convention would be prohibited); Advisory Opinion 1980-28, 1 Federal Election Campaign Financing Guide (CCH), ¶ 5477 at 10,538 (1980) (payment by local party committee for newspaper advertising which advocates the selection of certain delegates to attend the Republican National Convention is an expenditure under the Act.)

^{9/} Democratic caucuses are held during February of a presidential election year in Maine. The Democratic Party does not conduct a presidential preference primary in Maine.

As to the second factor, it is the position of the General Counsel that the expenditure is subject to the prohibitions of the Act and does not involve an exempt communication by the U.P.I.U. to its members. General treasury monies may be used to finance partisan communications, but such communications may only reach union members and their families. Although the instant ad may have been aimed at union members, it reached beyond membership to the general public as the ad was placed in a general circulation newspaper. Thus, the expenditure does not appear to fall within the exemption of 2 U.S.C. § 441b(b) (2) (A). See Advisory Opinion 1978-102, 1 Federal Election Financing Guide (CCH), ¶ 5397, at 10,410 (1979). Accordingly, the General Counsel recommends that the Commission find reason to believe that the U.P.I.U. violated 2 U.S.C. § 441b(a) by making an expenditure in connection with a federal election. 10/

10/ PEP's initial reporting of this expenditure suggested a connection with the Kennedy campaign; however, information subsequently provided does not indicate that an an-kind contribution is involved.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 19, 1982

Nicholas C. Vrataric, Secretary-Treasurer
United Paperworkers International Union
Political Education Program
702 Church Street
P.O. Box 1475
Nashville, Tennessee 37202

Re: MUR 1478

Dear Mr. Vrataric:

On November 16, 1982, the Commission determined that there is reason to believe that your committee, the United Paperworkers International Union Political Education Program, violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), and 11 C.F.R. § 102.5(a)(1)(i). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any

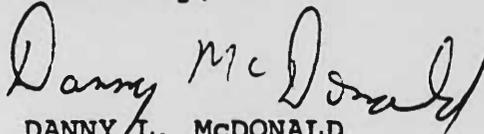
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notifications and other communications from the Commission.

The investigation now being conducted will be 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.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Maura White, the staff member assigned to this matter, at 202-523-4057.

Sincerely,



DANNY L. McDONALD
Vice Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT United Paperworkers International
Union Political Education Program

MUR 1478
STAFF MEMBER
& TEL. NO.
White
202-523-4057

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

SUMMARY OF ALLEGATIONS

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This matter involves the commingling of voluntary and non-voluntary funds by the United Paperworkers International Union Political Education Program ("PEP") and the United Paperworkers International Union ("U.P.I.U.") in violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i), a contribution to a federal candidate by the U.P.I.U. in violation of 2 U.S.C. § 441b(a), and a violation of 2 U.S.C. § 441b(a) by the U.P.I.U. in connection with an advertisement in the Maine Sunday Telegram.

FACTUAL AND LEGAL ANALYSIS

1. The Facts

(a) Commingling of Voluntary and Non-Voluntary Funds

The 1980 October Quarterly Report of PEP disclosed a contribution to the Committee on Political Education, AFL-CIO,

on September 26, 1980, which totalled \$25,000. 1/ A Request for Additional Information ("RFAI"), questioning whether this constituted an excessive contribution, was mailed to PEP on August 26, 1981, and a second notice was sent on September 18, 1981. In a response dated September 23, 1981, PEP's treasurer stated that the contribution was made through secretarial error from PEP's funds, instead of the union's general fund, and that the \$25,000 would be reimbursed to PEP from the union's general fund.

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A telephone conversation was initiated by a staff member of the Reports Analysis Division on October 6, 1981, to inform the treasurer that the transfer of funds described in his September 23, 1981, letter was impermissible, since voluntary and non-voluntary dollars would be commingled. The treasurer stated that voluntary and non-voluntary dollars would not be commingled in that the transfer from the union's general account to PEP would be deposited in their educational/treasury ("non-voluntary") account. He explained that PEP maintains two bank accounts, a non-voluntary account and a voluntary account, and that voluntary contributions from local unions' members are deposited into the voluntary account.

1/ The \$25,000 contribution to the AFL-CIO COPE was not reported by the AFL-CIO's registered political committee as being received and appears to have been designated to a non-Federal educational account.

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An additional amendment to the October Quarterly Report, dated October 7, 1981, confirmed the existence of the voluntary and non-voluntary accounts maintained by PEP. 2/ The response explained that the two funds are kept in separate bank accounts, and copies of blank checks evidencing the existence of the two accounts were submitted. The letter also stated that any money which is received but which is not clearly spelled out as voluntary money is automatically put into the educational account ("non-voluntary"), and the two accounts are not commingled. (But see below).

On October 15, 1981, PEP's treasurer was informed by telephone by staff of the Reports Analysis Division that it would not be necessary to continue reporting the activity of the non-voluntary account, and that the 1981 Year End Report should not include this activity. On November 4, 1981, an RFAI was sent on the amended October Quarterly Report to obtain more specific information on the usage of the non-voluntary account. In addition, RFAI's were sent on the 1980 July Quarterly, 30 Day Post-General and amended Year End Reports to request the proper categorization of receipts. Responses were not received and,

2/ According to the treasurer, the amendment "shows a deletion of the \$25,000 contribution issued to COPE." The treasurer further explained that while "the Union Executive Board voted to make a contribution of \$25,000 to COPE out of the Union's General Fund for educational purposes," the check was erroneously "issued on the UPIU Political Education Program from its Educational Account (non-voluntary)." Included with the response was a copy of a \$25,000 check, dated September 25, 1981, drawn on the account of the United Paperworkers International Union ("U.P.I.U."), and payable to the Political Education Program.

therefore, a second notice was mailed on November 27, 1981, for all four reports.

PEP submitted additional amendments for the 1980 July Quarterly, October Quarterly, 30 Day Post-General and Year End Reports on February 16, 1982. The receipt of non-voluntary funds was reported separately on Line 17 ("other receipts"), and supporting Schedule B's for Line 21 ("contributions to federal candidates and other political committees") were amended to show which disbursements were made from the non-voluntary account and voluntary account. However, PEP did not specifically note on Schedule B for Line 21, Page 2 of the October Quarterly Report, which account was used to make contributions to nine federal candidates totalling \$5,400. ^{3/} Furthermore, PEP did not clarify whether other reports disclosed activity from both accounts.

The three reports filed by PEP during 1981, the Mid-Year Report (1/1/81 - 6/30/81), October 15 Report (6/30/81 - 9/30/81), and the Year-End Report (10/1/81 - 12/31/81), included the activity of both of PEP's accounts. The Year-End Report also disclosed a \$500 contribution to the Citizens for David Obey Committee (candidate for U.S. Congress, 7th District of Wisconsin) from PEP's non-voluntary account, dated December 16,

^{3/} A letter accompanying the 1980 October Quarterly amendment stated that with respect to the filing, the receipts had been separated according to the two funds and that "[a]ll funds deposited in both accounts have been deposited and disbursed in accordance with the FEC regulations."

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1981. 4/

The 1982 April Quarterly Report disclosed receipts and disbursements of the non-voluntary account, including a discrepancy between the beginning cash figure of this report and the ending cash figure of the Year End Report. On June 30, 1982, RFAI's were sent to PEP regarding its 1981-82 reports which, among other things, advised the committee to delete the non-voluntary account from its reports, and to request a full refund from the Citizens for David Obey Committee because the contribution to that committee appeared to have been made from PEP's non-voluntary account.

On July 9, 1982, a representative of PEP called to seek clarification regarding the RFAI's. During the conversation, the representative stated that the contribution to the Citizens for David Obey Committee was erroneously made from the non-voluntary fund, and that the discrepancy between cash-on-hand figures was a result of PEP's accounting system for depositing transfers from local unions. With respect to the latter point, the representative explained that undesignated transfers from local unions are deposited into the non-voluntary account. A transfer to the voluntary account is made if it is subsequently determined that the funds were intended to be designated for the voluntary account. In addition, the representative stated that rather

4/ The Citizens for David Obey Committee reported the receipt of a \$500 contribution from PEP on December 22, 1981.

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than requesting a refund of \$500 from the Citizens for David Obey Committee, PEP would prefer to transfer \$500 from the voluntary to the non-voluntary account.

Staff of the Reports Analysis Division initiated a follow-up conversation with PEP representatives on July 12, 1982, in order to suggest procedures for rectifying the problems, and recommended that an escrow account be established for the purpose of depositing undesignated transfers from local unions which would provide PEP with a ten day period to determine into which account (i.e., voluntary or non-voluntary) the funds should be deposited. PEP was also advised that instead of transferring \$500 from the voluntary to the non-voluntary account, it should seek a refund of the contribution directly from the Citizens for David Obey Committee.

Amendments to the 1981-82 reports were received at the Commission on July 20, 1982. As suggested in the RFAI's, the non-voluntary account activity was deleted from PEP's reports. After deleting the activity of this account, PEP's 1981 July Quarterly Report no longer reflects a disbursement (\$830.54) to the Sheraton-Carlton Hotel on May 21, 1981, for a "luncheon for Sen. George Mitchell, Maine," thereby suggesting that this disbursement was made from PEP's non-voluntary account.

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(b) Disbursements related to Senator Kennedy's Presidential bid.

The 1980 April Quarterly and July Quarterly Reports of PEP reported five disbursements apparently related to Senator Kennedy's Presidential campaign. One of the disbursements, dated January 8, 1980, is reported as a direct \$2,000 contribution to the Kennedy for President Committee. The other disbursements were reported as follows: \$1,517.04 on January 23, 1980, to "Maine Sunday Telegram, Kennedy Campaign Headquarters, 13 Columbia Street, Augusta, Maine," for "cost of political ad in support of Kennedy sent to our members"; \$500 on February 22, 1980, to "UPIU Local 75 Labor Committee for Kennedy" for "support for Ted Kennedy"; \$3,000 on April 22, 1980, to the U.A.W. International Union for "New Hampshire Labor for Kennedy Literature"; and, \$237 on April 16, 1980, to Bronwal Printing for "Kennedy Four Point Brochure for our members in Illinois."

On June 17, 1981, the Reports Analysis Division mailed an RFAI to PEP which notified them that the five disbursements discussed above, when aggregated, appeared to exceed the limits of 2 U.S.C. § 441a. The RFAI noted that some of the "expenditures appear to be made on behalf of Senator Kennedy's Presidential Campaign as contributions in-kind advocating the election of a clearly identified candidate." By letter dated June 25, 1981, the treasurer

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of PEP responded to the RFAI and described in greater detail the purpose of four of the disbursements and suggested that they constitute communication costs which are exempt from the definition of contribution and expenditure pursuant to 11 C.F.R. § 114.1(a). With respect to the disbursement to the U.A.W. International Union, the treasurer stated that several unions jointly printed some literature for distribution to their respective members, and that it was not given to any committee. The disbursement to Bronwal Printing was explained as "the printing of a letter sent to U.P.I.U. members only in Illinois," and the disbursement to the Maine Sunday Telegram as "an advertisement taken out addressed to U.P.I.U. members urging them to elect precinct delegates." Finally, the disbursement to U.P.I.U. Local 75 was described as being "strictly used for transporting our (U.P.I.U.) members to the polls." On October 14, 1981, the director of PEP informed a staff member of the Reports Analysis Division by telephone that the communication costs disclosed in PEP's reports had been paid for with non-voluntary funds. An amendment to PEP's July 15, 1980, Quarterly Report (filed on February 16, 1982), however, lists the disbursement to Bronwal Printing (\$237) as having been made from PEP's voluntary account. 5/

5/ The amendment reported the \$3,000 disbursement to the U.A.W. International Union on April 22, 1980, as having been drawn on the non-voluntary account.

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2. The law applicable

A political committee which finances activity in connection with both federal and non-federal elections may establish a separate federal account into which only funds subject to the prohibitions and limitations of the Act may be deposited. All disbursements, contributions, expenditures and transfers by the committee in connection with any federal election shall be made from its federal account. No transfers may be made to such federal account from any other account maintained by such organization for the purpose of financing activity in connection with non-federal elections. 11 C.F.R. § 102.5(a)(1)(i).

Pursuant to 2 U.S.C. § 441b(a), a labor organization may not make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or a Representative in Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices.

For purposes of 2 U.S.C. § 441b(a), the term "contribution or expenditure" is defined at 2 U.S.C. § 441b(b)(2) and 11 C.F.R. § 114.1(a)(1) to include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money or anything of value to any candidate, campaign committee, political party or committee, organization, or any other person in

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connection with a federal election. The term "contribution or expenditure" does not include communications by a labor organization to its members on any subject. 2 U.S.C. § 441b(b) (2)(A) and 11 C.F.R. § 114.1(a)(2)(i).

Section 431(9)(B)(iii) of Title 2, United States Code, provides that the term "expenditure" does not include any communication by any membership organization to its members if such membership organization is not organized primarily for the purpose of influencing the nomination for election, or election, of any individual to Federal office, except that the costs incurred by a membership organization (including a labor organization) directly attributable to a communication expressly advocating the election or defeat of a clearly identified candidate (other than a communication devoted to subjects other than the express advocacy of the election or defeat of a clearly identified candidate), shall, if such costs exceed \$2,000 for any election, be reported to the Commission in accordance with 2 U.S.C. § 434(a)(4)(A)(i).

As set forth at 11 C.F.R. § 114.3(a), a labor organization may make partisan communications in connection with a federal election to its members and their families. The manner in which partisan communications may be made includes, but is not limited to, the distribution of printed material of a partisan nature

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by a labor organization to its members and their families, provided that the material is produced at the expense of the labor organization or its separate segregated fund, and that the material constitutes a communication of the views of the labor organization and is not simply the republication or reproduction in whole or in part, of any broadcast transcript or tape or any written, graphic, or other form of campaign materials prepared by the candidate, his or her campaign committees, or their authorized agents. 11 C.F.R. § 114.3(c)(1)(i) and (ii).

Partisan communications may also include a labor organization's transportation of its members and their families to the polls. 11 C.F.R. § 114.3(c)(4).

The term "contribution" is defined at 2 U.S.C. § 431(8)(A) to include any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. The term "expenditure" is defined at 2 U.S.C. § 431(9)(A) to include any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for federal office.

As set forth at 2 U.S.C. § 441a(a)(2)(A) no multicandidate political committee shall made contributions to any candidate and his authorized political committees with respect to any election for federal office which, in the aggregate, exceed \$5,000.

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3. Application of the law to the commingling problem.

The first issue involved herein, concerning the commingling of funds, arises from the fact that PEP maintains two accounts -- a voluntary account, which is used to finance federal elections, and a non-voluntary account which appears to be used in substantial part to support state and local candidates. While PEP may maintain two separate accounts, PEP may not transfer funds from its non-voluntary account into its voluntary account. PEP, however, uses its non-voluntary account as an informal "escrow" account to hold funds from local unions' members which are undesignated; if it is subsequently determined that the funds represent voluntary contributions, they are transferred to the voluntary account. Such activity constitutes the commingling of union and voluntary funds and the impermissible transference of funds, in violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i). As PEP has been reporting the activity of both of its accounts since at least 1980, this commingling would seem to have commenced sometime prior to 1980, and appears to be current practice as well. Hence, the General Counsel recommends that the Commission find reason to believe that the U.P.I.U. and PEP have violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i).

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4. Application of the law to the disbursements to candidates from the non-voluntary account

The information available thus far indicates that the non-voluntary account of PEP was used to contribute to at least one federal candidate, David Obey. Which of PEP's two accounts was used to support nine other federal candidates is not known. PEP has acknowledged that its non-voluntary account was the source of the funds which were contributed to the Obey campaign. Although PEP has offered to transfer an amount equal to the Obey contribution from its voluntary account to its non-voluntary account, it is not clear whether such has occurred. (PEP has not reported a refund from Citizens for David Obey). It is the position of the General Counsel that the refund of the contribution or the transfer of funds between PEP's two accounts, would serve only to mitigate the violation. In that the non-voluntary account is comprised of union funds and such funds were contributed to the Obey campaign, there is reason to believe, in the General Counsel's view, that the U.P.I.U. violated 2 U.S.C. § 441b(a).

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With regard to the disbursement from the non-voluntary fund for a luncheon for Senator Mitchell, the Commission determined that there is reason to believe that the U.P.I.U. violated 2 U.S.C. § 441b by making a contribution in connection with a federal election. Although the Mitchell for Senate Committee did not report the receipt of an in-kind contribution from PEP, Senator Mitchell was an announced candidate at the time of the luncheon.

5. Application of the law to the \$25,000 transfers.

As to the initial transfer of \$25,000 to the AFL-CIO COPE from PEP, such a transfer appears to have been permissible as the \$25,000 was drawn on the non-voluntary account of PEP and did not go to the separate segregated fund of the AFL-CIO. The subsequent reimbursement made by the U.P.I.U. to PEP also appears to have been permissible since the funds were deposited into PEP's non-voluntary account.

6. Application of the law to the disbursements in connection with the presidential campaign of Senator Kennedy

Although contradictory information has been provided by PEP, PEP appears to have made disbursements from both its voluntary and non-voluntary account in connection with Senator Kennedy's presidential bid. In the General Counsel's view, the disbursements from PEP's voluntary account were permissible, and one of the three disbursements from the non-voluntary account was not.

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As discussed above, PEP used its voluntary account to make a direct contribution to the Kennedy campaign (\$2,000) and to pay (\$237) for the distribution of pro-Kennedy literature to U.P.I.U. members. The General Counsel's position as to the permissibility of these disbursements, reflects the apparent fact that PEP's \$5,000 contribution limitation to the 1980 Kennedy campaign had not been exceeded and that only funds subject to the limitations and prohibitions of the Act were used for these disbursements. 6/ While it is clear that PEP made a "contribution" pursuant to 2 U.S.C. § 431(8)(A) of \$2,000 and such counts against its contribution limitation, there is no evidence at this juncture that there was any coordination with the Kennedy campaign regarding the \$237 disbursement and that it is therefore subject to limitation as an in-kind contribution. In any event, PEP's contribution limitation would still not have been exceeded. Nor is there any evidence at this juncture that the \$237 disbursement involved "express advocacy" such that it would have to be reported by PEP on Schedule E rather than Schedule B. The disbursement was in fact reported.

With respect to the three disbursements relating to Senator Kennedy's candidacy which were made from PEP's non-voluntary

6/ PEP was a qualified multicandidate committee at the time the contribution involved herein was made.

The FEC "G" Index of the Kennedy for President Committee lists the receipt of only a \$2,000 contribution from PEP, and a review of PEP's reports did not reveal any other contributions to the Kennedy for President Committee.

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account containing union funds, PEP claims that the disbursements were used to finance communications to U.P.I.U. members and that they therefore are not subject to the limitations of 2 U.S.C. § 441b(a). While the disbursements to the U.A.W. International Union and to U.P.I.U. Local #75 appear to have been for exempt partisan communications pursuant to 2 U.S.C. § 441b(b)(2)(A) and 11 C.F.R. § 114.3(a) 7/, it is the view of the General Counsel that there is reason to believe that the third disbursement at issue, apparently to the Maine Sunday Telegram, involves a violation of 2 U.S.C. § 441b(a) by the U.P.I.U.

Two factors are involved herein -- whether the disbursement to the Maine Sunday Telegram is in fact "in connection with any primary election or political convention or caucus held to select candidates" under 2 U.S.C. § 441b(a), and, if so, whether it should be considered exempt from the definition of expenditure pursuant to 2 U.S.C. § 441b(b)(2)(A). The disbursement to the Maine Sunday Telegram apparently financed an ad which urged the election of precinct delegates supporting Senator Kennedy. 8/

7/ These disbursements were for the distribution of pro-Kennedy literature to U.P.I.U. members, and the transportation of U.P.I.U. members to the polls.

8/ PEP's initial reporting of this disbursement listed the purpose as the "cost of a political ad in support of Kennedy sent to our members." It was the June 25, 1981, letter from the treasurer that described this as "an advertisement taken out addressed to U.P.I.U. members urging them to elect precinct delegates."

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In Maine the Democratic Party is structured such that precinct delegates, upon election at the local caucuses, proceed to the state convention where they elect delegates to the national nominating convention. ^{9/} The term "primary election" is defined at 11 C.F.R. § 100.2(c) (3) to include "an election which is held to select delegates to a national nominating convention." Since the precinct delegate elections select delegates to the state democratic convention in Maine which, in turn, will select delegates to the national nominating convention which has authority to nominate a presidential candidate, the U.P.I.U.'s payment for an ad urging the election of precinct delegates is a payment made "in connection with any primary election or political convention or caucus held to select candidate," in the General Counsel's view. See Advisory Opinion 1979-7, 1 Federal Election Campaign Financing Guide (CCH) ¶ 5396, at 10,408 (1979) (payments by corporation or labor organization for an "Affirmative Action Program" in selecting delegates to the national nominating convention would be prohibited); Advisory Opinion 1980-28, 1 Federal Election Campaign Financing Guide (CCH), ¶ 5477 at 10,538 (1980) (payment by local party committee for newspaper advertising which advocates the selection of certain delegates to attend the Republican National Convention is an expenditure under the Act.)

^{9/} Democratic caucuses are held during February of a presidential election year in Maine. The Democratic Party does not conduct a presidential preference primary in Maine.

As to the second factor, it is the position of the General Counsel that the expenditure is subject to the prohibitions of the Act and does not involve an exempt communication by the U.P.I.U. to its members. General treasury monies may be used to finance partisan communications, but such communications may only reach union members and their families. Although the instant ad may have been aimed at union members, it reached beyond membership to the general public as the ad was placed in a general circulation newspaper. Thus, the expenditure does not appear to fall within the exemption of 2 U.S.C. § 441b(b) (2) (A). See Advisory Opinion 1978-102, 1 Federal Election Financing Guide (CCH), § 5397, at 10,410 (1979). Accordingly, the General Counsel recommends that the Commission find reason to believe that the U.P.I.U. violated 2 U.S.C. § 441b(a) by making an expenditure in connection with a federal election. 10/

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10/ PEP's initial reporting of this expenditure suggested a connection with the Kennedy campaign; however, information subsequently provided does not indicate that an an-kind contribution is involved.

*Corrected
Reid 11-18-82*

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
United Paperworkers International)	
Union Political Education Program)	MUR 1478
United Paperworkers International)	
Union)	

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on November 16, 1982, do hereby certify that the Commission took the following actions in MUR 1478:

1. Decided by a vote of 5-0 to find reason to believe that the United Paperworkers International Union violated 2 U.S.C. §441b in connection with the luncheon for Senator Mitchell.

2. Decided by a vote of 5-0 to -
 - a) Find reason to believe the United Paperworkers International Union and the United Paperworkers International Union Political Education Program violated 2 U.S.C. §441b(a) and 11 C.F.R. §102.5(a)(1)(i) by transferring funds from an account containing non-voluntary monies to an account containing voluntary monies.

 - b) Find reason to believe the United Paperworkers International Union violated 2 U.S.C. §441b(a) by contributing to the Citizens for Obey Committee.

(CONTINUED)

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- c) Find reason to believe that the United Paperworkers International Union violated 2 U.S.C. §441b(a) in connection with its advertisement in the Maine Sunday Telegram.
- d) Send appropriate letters pursuant to these findings.

Commissioners Aikens, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decisions; Commissioner Elliott was not present at the time of the votes.

Attest:

11/16/82

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

33040400207



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS / JAN SAVAGE *mwe JS*

DATE: NOVEMBER 9, 1982

SUBJECT: OBJECTION - MUR 1478 First General
Counsel's Report dated November 4, 1982

You were notified previously of an objection by
Commissioner Harris.

Commissioner Aikens submitted an additional objection
on November 9, 1982 at 12:15.

This matter will be discussed in executive session
on November 16, 1982.

83040400208



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE, GENERAL COUNSEL
FROM: MARJORIE W. ~~EMMONS~~ JODY RANSOM *JR*
DATE: NOVEMBER 8, 1982
SUBJECT: OBJECTION - MJR 1478 First General Counsel's
Report dated November 4, 1982; Received in
OCS, 11-4-82, 2:20

The above-named document was circulated to the Commission on
November 5, 1982 at 2:00.

Commissioner Harris submitted an objection at 11:03, November 8,
1982.

This matter will be placed on the agenda for the Executive
Session of Tuesday, November 16, 1982. A copy of Commissioner
Harris' vote sheet with comments is attached.

Attachment:
vote sheet

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48-HOUR BALLOT

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

82 NOV 8 All: 03

Date & Time Transmitted: FRIDAY, 11-5-82, 2:00

COMMISSIONER: MCGARRY, AIKENS, McDONALD, ELLIOTT, REICHE, HARRIS

RETURN TO COMMISSION SECRETARY BY TUESDAY, NOVEMBER 9, 1982, 2:00

SUBJECT: MUR 1478 First General Counsel's Report
dated November 4, 1982

- () I approve the recommendation in the attached report.
- (V) I object to the recommendation.

COMMENTS: I think an audit would be a better way
to proceed.

Date: 11-8-82 Signature: Thomas E. Harris

ALL BALLOTS MUST BE SIGNED AND DATED. PLEASE RETURN ONLY THE BALLOT TO THE
COMMISSION SECRETARY. PLEASE RETURN THE BALLOT NO LATER THAN THE DATE AND
TIME SHOWN ABOVE.

From the Office of the Commission Secretary

83040400210

8

November 4, 1982

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: MUR 1478

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

Thank you.

Attachment

cc: White

33040400211

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

82 NOV 4 P 2: 20

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 11-4-82

MUR 1478
STAFF White

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

RESPONDENTS' NAMES: United Paperworkers International Union
Political Education Program; United
Paperworkers International Union

RELEVANT STATUTE: 2 U.S.C. § 441b(a)
2 U.S.C. § 441b(b) (2) (A)

INTERNAL REPORTS CHECKED: Public records

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

The United Paperworkers International Union Political Education Program ("PEP") was referred to the Office of General Counsel by the Reports Analysis Division for an apparent violation of 2 U.S.C. § 441b(a) resulting from the commingling of voluntary and non-voluntary funds. Another matter involving disbursements from PEP's non-voluntary account was also incorporated into this matter during Executive Session on September 29, 1982. (Attachments 1 and 2).

FACTUAL AND LEGAL ANALYSIS

1. The Facts

(a) Commingling of Voluntary and Non-Voluntary Funds

The 1980 October Quarterly Report of PEP disclosed a contribution to the Committee on Political Education, AFL-CIO,

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on September 26, 1980, which totalled \$25,000. 1/ A Request for Additional Information ("RFAI"), questioning whether this constituted an excessive contribution, was mailed to PEP on August 26, 1981, and a second notice was sent on September 18, 1981. In a response dated September 23, 1981, PEP's treasurer stated that the contribution was made through secretarial error from PEP's funds, instead of the union's general fund, and that the \$25,000 would be reimbursed to PEP from the union's general fund.

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A telephone conversation was initiated by a staff member of the Reports Analysis Division on October 6, 1981, to inform the treasurer that the transfer of funds described in his September 23, 1981, letter was impermissible, since voluntary and non-voluntary dollars would be commingled. The treasurer stated that voluntary and non-voluntary dollars would not be commingled in that the transfer from the union's general account to PEP would be deposited in their educational/treasury ("non-voluntary") account. He explained that PEP maintains two bank accounts, a non-voluntary account and a voluntary account, and that voluntary contributions from local unions' members are deposited into the voluntary account.

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PEP submitted additional amendments for the 1980 July Quarterly, October Quarterly, 30 Day Post-General and Year End Reports on February 16, 1982. The receipt of non-voluntary funds was reported separately on Line 17 ("other receipts"), and supporting Schedule B's for Line 21 ("contributions to federal candidates and other political committees") were amended to show which disbursements were made from the non-voluntary account and voluntary account. However, PEP did not specifically note on Schedule B for Line 21, Page 2 of the October Quarterly Report, which account was used to make contributions to nine federal candidates totalling \$5,400. ^{3/} Furthermore, PEP did not clarify whether other reports disclosed activity from both accounts.

The three reports filed by PEP during 1981, the Mid-Year Report (1/1/81 - 6/30/81), October 15 Report (6/30/81 - 9/30/81), and the Year-End Report (10/1/81 - 12/31/81), included the activity of both of PEP's accounts. The Year-End Report also disclosed a \$500 contribution to the Citizens for David Obey Committee (candidate for U.S. Congress, 7th District of Wisconsin) from PEP's non-voluntary account, dated December 16,

^{3/} A letter accompanying the 1980 October Quarterly amendment stated that with respect to the filing, the receipts had been separated according to the two funds and that "[a]ll funds deposited in both accounts have been deposited and disbursed in accordance with the FEC regulations."

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The 1982 April Quarterly Report disclosed receipts and disbursements of the non-voluntary account, including a discrepancy between the beginning cash figure of this report and the ending cash figure of the Year End Report. On June 30, 1982, RFAI's were sent to PEP regarding its 1981-82 reports which, among other things, advised the committee to delete the non-voluntary account from its reports, and to request a full refund from the Citizens for David Obey Committee because the contribution to that committee appeared to have been made from PEP's non-voluntary account.

On July 9, 1982, a representative of PEP called to seek clarification regarding the RFAI's. During the conversation, the representative stated that the contribution to the Citizens for David Obey Committee was erroneously made from the non-voluntary fund, and that the discrepancy between cash-on-hand figures was a result of PEP's accounting system for depositing transfers from local unions. With respect to the latter point, the representative explained that undesignated transfers from local unions are deposited into the non-voluntary account. A transfer to the voluntary account is made if it is subsequently determined that the funds were intended to be designated for the voluntary account. In addition, the representative stated that rather

4/ The Citizens for David Obey Committee reported the receipt of a \$500 contribution from PEP on December 22, 1981.

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than requesting a refund of \$500 from the Citizens for David Obey Committee, PEP would prefer to transfer \$500 from the voluntary to the non-voluntary account.

Staff of the Reports Analysis Division initiated a follow-up conversation with PEP representatives on July 12, 1982, in order to suggest procedures for rectifying the problems, and recommended that an escrow account be established for the purpose of depositing undesignated transfers from local unions which would provide PEP with a ten day period to determine into which account (i.e., voluntary or non-voluntary) the funds should be deposited. PEP was also advised that instead of transferring \$500 from the voluntary to the non-voluntary account, it should seek a refund of the contribution directly from the Citizens for David Obey Committee.

Amendments to the 1981-82 reports were received at the Commission on July 20, 1982. As suggested in the RFAI's, the non-voluntary account activity was deleted from PEP's reports. After deleting the activity of this account, PEP's 1981 July Quarterly Report no longer reflects a disbursement (\$830.54) to the Sheraton-Carlton Hotel on May 21, 1981, for a "luncheon for Sen. George Mitchell, Maine," thereby suggesting that this disbursement was made from PEP's non-voluntary account.

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(b) Disbursements related to Senator Kennedy's Presidential bid.

The 1980 April Quarterly and July Quarterly Reports of PEP reported five disbursements apparently related to Senator Kennedy's Presidential campaign. One of the disbursements, dated January 8, 1980, is reported as a direct \$2,000 contribution to the Kennedy for President Committee. The other disbursements were reported as follows: \$1,517.04 on January 23, 1980, to "Maine Sunday Telegram, Kennedy Campaign Headquarters, 13 Columbia Street, Augusta, Maine," for "cost of political ad in support of Kennedy sent to our members"; \$500 on February 22, 1980, to "UPIU Local 75 Labor Committee for Kennedy" for "support for Ted Kennedy"; \$3,000 on April 22, 1980, to the U.A.W. International Union for "New Hampshire Labor for Kennedy Literature"; and, \$237 on April 16, 1980, to Bronwal Printing for "Kennedy Four Point Brochure for our members in Illinois."

On June 17, 1981, the Reports Analysis Division mailed an RFAI to PEP which notified them that the five disbursements discussed above, when aggregated, appeared to exceed the limits of 2 U.S.C. § 441a. The RFAI noted that some of the "expenditures appear to be made on behalf of Senator Kennedy's Presidential Campaign as contributions in-kind advocating the election of a clearly identified candidate." By letter dated June 25, 1981, the treasurer

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of PEP responded to the RFAI and described in greater detail the purpose of four of the disbursements and suggested that they constitute communication costs which are exempt from the definition of contribution and expenditure pursuant to 11 C.F.R. § 114.1(a). With respect to the disbursement to the U.A.W. International Union, the treasurer stated that several unions jointly printed some literature for distribution to their respective members, and that it was not given to any committee. The disbursement to Bronwal Printing was explained as "the printing of a letter sent to U.P.I.U. members only in Illinois," and the disbursement to the Maine Sunday Telegram as "an advertisement taken out addressed to U.P.I.U. members urging them to elect precinct delegates." Finally, the disbursement to U.P.I.U. Local 75 was described as being "strictly used for transporting our (U.P.I.U.) members to the polls." On October 14, 1981, the director of PEP informed a staff member of the Reports Analysis Division by telephone that the communication costs disclosed in PEP's reports had been paid for with non-voluntary funds. An amendment to PEP's July 15, 1980, Quarterly Report (filed on February 16, 1982), however, lists the disbursement to Bronwal Printing (\$237) as having been made from PEP's voluntary account. 5/

5/ The amendment reported the \$3,000 disbursement to the U.A.W. International Union on April 22, 1980, as having been drawn on the non-voluntary account.

2. The law applicable

A political committee which finances activity in connection with both federal and non-federal elections may establish a separate federal account into which only funds subject to the prohibitions and limitations of the Act may be deposited. All disbursements, contributions, expenditures and transfers by the committee in connection with any federal election shall be made from its federal account. No transfers may be made to such federal account from any other account maintained by such organization for the purpose of financing activity in connection with non-federal elections. 11 C.F.R. § 102.5(a)(1)(i).

Pursuant to 2 U.S.C. § 441b(a), a labor organization may not make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or a Representative in Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices.

For purposes of 2 U.S.C. § 441b(a), the term "contribution or expenditure" is defined at 2 U.S.C. § 441b(b)(2) and 11 C.F.R. § 114.1(a)(1) to include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money or anything of value to any candidate, campaign committee, political party or committee, organization, or any other person in

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connection with a federal election. The term "contribution or expenditure" does not include communications by a labor organization to its members on any subject. 2 U.S.C. § 441b(b) (2) (A) and 11 C.F.R. § 114.1(a) (2) (i).

Section 431(9) (B) (iii) of Title 2, United States Code, provides that the term "expenditure" does not include any communication by any membership organization to its members if such membership organization is not organized primarily for the purpose of influencing the nomination for election, or election, of any individual to Federal office, except that the costs incurred by a membership organization (including a labor organization) directly attributable to a communication expressly advocating the election or defeat of a clearly identified candidate (other than a communication devoted to subjects other than the express advocacy of the election or defeat of a clearly identified candidate), shall, if such costs exceed \$2,000 for any election, be reported to the Commission in accordance with 2 U.S.C. § 434(a) (4) (A) (i).

As set forth at 11 C.F.R. § 114.3(a), a labor organization may make partisan communications in connection with a federal election to its members and their families. The manner in which partisan communications may be made includes, but is not limited to, the distribution of printed material of a partisan nature

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by a labor organization to its members and their families, provided that the material is produced at the expense of the labor organization or its separate segregated fund, and that the material constitutes a communication of the views of the labor organization and is not simply the republication or reproduction in whole or in part, of any broadcast transcript or tape or any written, graphic, or other form of campaign materials prepared by the candidate, his or her campaign committees, or their authorized agents. 11 C.F.R. § 114.3(c) (1) (i) and (ii). Partisan communications may also include a labor organization's transportation of its members and their families to the polls. 11 C.F.R. § 114.3(c) (4).

The term "contribution" is defined at 2 U.S.C. § 431(8) (A) to include any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. The term "expenditure" is defined at 2 U.S.C. § 431(9) (A) to include any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for federal office.

As set forth at 2 U.S.C. § 441a(a) (2) (A) no multicandidate political committee shall made contributions to any candidate and his authorized political committees with respect to any election for federal office which, in the aggregate, exceed \$5,000.

3. Application of the law to the commingling problem.

The first issue involved herein, concerning the commingling of funds, arises from the fact that PEP maintains two accounts -- a voluntary account, which is used to finance federal elections, and a non-voluntary account which appears to be used in substantial part to support state and local candidates. While PEP may maintain two separate accounts, PEP may not transfer funds from its non-voluntary account into its voluntary account. PEP, however, uses its non-voluntary account as an informal "escrow" account to hold funds from local unions' members which are undesignated; if it is subsequently determined that the funds represent voluntary contributions, they are transferred to the voluntary account. Such activity constitutes the commingling of union and voluntary funds and the impermissible transference of funds, in violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i). As PEP has been reporting the activity of both of its accounts since at least 1980, this commingling would seem to have commenced sometime prior to 1980, and appears to be current practice as well. Hence, the General Counsel recommends that the Commission find reason to believe that the U.P.I.U. and PEP have violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i).

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4. Application of the law to the disbursements to candidates from the non-voluntary account

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The information available thus far indicates that the non-voluntary account of PEP was used to contribute to at least one federal candidate, David Obey. Which of PEP's two accounts was used to support nine other federal candidates is not known. PEP has acknowledged that its non-voluntary account was the source of the funds which were contributed to the Obey campaign. Although PEP has offered to transfer an amount equal to the Obey contribution from its voluntary account to its non-voluntary account, it is not clear whether such has occurred. (PEP has not reported a refund from Citizens for David Obey). It is the position of the General Counsel that the refund of the contribution or the transfer of funds between PEP's two accounts, would serve only to mitigate the violation. In that the non-voluntary account is comprised of union funds and such funds were contributed to the Obey campaign, there is reason to believe, in the General Counsel's view, that the U.P.I.U. violated 2 U.S.C. § 441b(a). Because we have no indication that the Obey campaign knew that it accepted funds from a non-voluntary account of PEP, we are not making any recommendation at this time regarding the Obey campaign committee.

There is insufficient evidence, in the General Counsel's view, to make a reason to believe finding at this time concerning

the disbursement from the non-voluntary fund for a luncheon for Senator Mitchell. While the expense was incurred several months after the Senator announced his intention to seek reelection, the Mitchell for Senate Committee did not report the receipt of an in-kind contribution from PEP, thereby suggesting that the event may have been unrelated to the Senator's reelection campaign. See Advisory Opinion 1980-89, 1 Federal Election Campaign Financing Guide (CCH), ¶ 5537, at 10,644 (1980), and opinions cited therein.

5. Application of the law to the \$25,000 transfers.

As to the initial transfer of \$25,000 to the AFL-CIO COPE from PEP, such a transfer appears to have been permissible as the \$25,000 was drawn on the non-voluntary account of PEP and did not go to the separate segregated fund of the AFL-CIO. The subsequent reimbursement made by the U.P.I.U. to PEP also appears to have been permissible since the funds were deposited into PEP's non-voluntary account.

6. Application of the law to the disbursements in connection with the presidential campaign of Senator Kennedy

Although contradictory information has been provided by PEP, PEP appears to have made disbursements from both its voluntary and non-voluntary account in connection with Senator Kennedy's presidential bid. In the General Counsel's view, the disbursements from PEP's voluntary account were permissible, and one of the three disbursements from the non-voluntary account was not.

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As discussed above, PEP used its voluntary account to make a direct contribution to the Kennedy campaign (\$2,000) and to pay (\$237) for the distribution of pro-Kennedy literature to U.P.I.U. members. The General Counsel's position as to the permissibility of these disbursements, reflects the apparent fact that PEP's \$5,000 contribution limitation to the 1980 Kennedy campaign had not been exceeded and that only funds subject to the limitations and prohibitions of the Act were used for these disbursements. 6/ While it is clear that PEP made a "contribution" pursuant to 2 U.S.C. § 431(8) (A) of \$2,000 and such counts against its contribution limitation, there is no evidence at this juncture that there was any coordination with the Kennedy campaign regarding the \$237 disbursement and that it is therefore subject to limitation as an in-kind contribution. In any event, PEP's contribution limitation would still not have been exceeded. Nor is there any evidence at this juncture that the \$237 disbursement involved "express advocacy" such that it would have to be reported by PEP on Schedule E rather than Schedule B. The disbursement was in fact reported.

With respect to the three disbursements relating to Senator Kennedy's candidacy which were made from PEP's non-voluntary

6/ PEP was a qualified multicandidate committee at the time the contribution involved herein was made.

The FEC "G" Index of the Kennedy for President Committee lists the receipt of only a \$2,000 contribution from PEP, and a review of PEP's reports did not reveal any other contributions to the Kennedy for President Committee.

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account containing union funds, PEP claims that the disbursements were used to finance communications to U.P.I.U. members and that they therefore are not subject to the limitations of 2 U.S.C. § 441b(a). While the disbursements to the U.A.W. International Union and to U.P.I.U. Local #75 appear to have been for exempt partisan communications pursuant to 2 U.S.C. § 441b(b)(2)(A) and 11 C.F.R. § 114.3(a) 7/, it is the view of the General Counsel that there is reason to believe that the third disbursement at issue, apparently to the Maine Sunday Telegram, involves a violation of 2 U.S.C. § 441b(a) by the U.P.I.U.

Two factors are involved herein -- whether the disbursement to the Maine Sunday Telegram is in fact "in connection with any primary election or political convention or caucus held to select candidates" under 2 U.S.C. § 441b(a), and, if so, whether it should be considered exempt from the definition of expenditure pursuant to 2 U.S.C. § 441b(b)(2)(A). The disbursement to the Maine Sunday Telegram apparently financed an ad which urged the election of precinct delegates supporting Senator Kennedy. 8/

7/ These disbursements were for the distribution of pro-Kennedy literature to U.P.I.U. members, and the transportation of U.P.I.U. members to the polls.

8/ PEP's initial reporting of this disbursement listed the purpose as the "cost of a political ad in support of Kennedy sent to our members." It was the June 25, 1981, letter from the treasurer that described this as "an advertisement taken out addressed to U.P.I.U. members urging them to elect precinct delegates."

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In Maine the Democratic Party is structured such that precinct delegates, upon election at the local caucuses, proceed to the state convention where they elect delegates to the national nominating convention. ^{9/} The term "primary election" is defined at 11 C.F.R. § 100.2(c)(3) to include "an election which is held to select delegates to a national nominating convention." Since the precinct delegate elections select delegates to the state democratic convention in Maine which, in turn, will select delegates to the national nominating convention which has authority to nominate a presidential candidate, the U.P.I.U.'s payment for an ad urging the election of precinct delegates is a payment made "in connection with any primary election or political convention or caucus held to select candidate," in the General Counsel's view. See Advisory Opinion 1979-7, 1 Federal Election Campaign Financing Guide (CCH) ¶ 5396, at 10,408 (1979) (payments by corporation or labor organization for an "Affirmative Action Program" in selecting delegates to the national nominating convention would be prohibited); Advisory Opinion 1980-28, 1 Federal Election Campaign Financing Guide (CCH), ¶ 5477 at 10,538 (1980) (payment by local party committee for newspaper advertising which advocates the selection of certain delegates to attend the Republican National Convention is an expenditure under the Act.)

^{9/} Democratic caucuses are held during February of a presidential election year in Maine. The Democratic Party does not conduct a presidential preference primary in Maine.

As to the second factor, it is the position of the General Counsel that the expenditure is subject to the prohibitions of the Act and does not involve an exempt communication by the U.P.I.U. to its members. General treasury monies may be used to finance partisan communications, but such communications may only reach union members and their families. Although the instant ad may have been aimed at union members, it reached beyond membership to the general public as the ad was placed in a general circulation newspaper. Thus, the expenditure does not appear to fall within the exemption of 2 U.S.C. § 441b(b) (2) (A). See Advisory Opinion 1978-102, 1 Federal Election Financing Guide (CCH), ¶ 5397, at 10,410 (1979). Accordingly, the General Counsel recommends that the Commission find reason to believe that the U.P.I.U. violated 2 U.S.C. § 441b(a) by making an expenditure in connection with a federal election. 10/

During Executive Session on September 29, 1982, several members of the Commission expressed an interest in conducting an audit of PEP. While we agree that an audit may ultimately prove necessary to resolve some of the issues in this matter (e.g., the extent of the commingling problem), at this time it is possible that respondents may be able to provide a thorough, documented response which will obviate the need for an audit. Accordingly,

10/ PEP's initial reporting of this expenditure suggested a connection with the Kennedy campaign; however, information subsequently provided does not indicate that an an-kind contribution is involved.

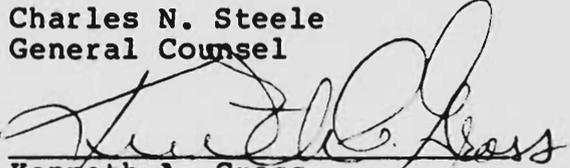
we made no recommendation at this time to conduct an audit. If, after having been given time to respond to the recommended reason to believe findings, the respondents have not provided an adequate response, our office will promptly make a recommendation as to the need for an audit.

RECOMMENDATIONS

1. Find reason to believe the United Paperworkers International Union and the United Paperworkers International Union Political Education Program violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i) by transferring funds from an account containing non-voluntary monies to an account containing voluntary monies.
2. Find reason to believe the United Paperworkers International Union violated 2 U.S.C. § 441b(a) by contributing to the Citizens for David Obey Committee.
3. Find reason to believe that the United Paperworkers International Union violated 2 U.S.C. § 441b(a) in connection with its advertisement in the Maine Sunday Telegram.
4. Send the attached letters.

Charles N. Steele
General Counsel

By:


Kenneth A. Gross
Associate General Counsel

November 4, 1982
Date

Attachments

- 1 - RAD Referral
- 2 - Request for Guidance
- 3 - Letters and Notifications(2)

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ATTACHMENT 1: RAD REFERRAL
(The attachments to the RAD Referral
(1-22) are available for review in
the Office of General Counsel)

DATE: July 30, 1982ANALYST: Mike Tangney

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

I. COMMITTEE: United Paperworkers International Union
 Political Education Program ("PEP") C00002394
 Nicholas Vrataric, Treasurer
 702 Church Street P.O. Box 1475
 Nashville, Tennessee 37202

II. RELEVANT STATUTE: 2 U.S.C. 441b(a); 11 C.F.R. 114.2(c),
 11 C.F.R. 114.5(b)

III. BACKGROUND:

Commingling of Treasury and Voluntary Dollars

PEP's 1980 October Quarterly Report disclosed a contribution to the Committee on Political Education, AFL-CIO, which totalled \$25,000. ^{1/} A Request for Additional Information ("RFAI"), questioning whether this constituted an excessive contribution, was mailed on August 26, 1981 (Attachment 2). A second notice was sent on September 18, 1981 (Attachment 3). In a response dated September 23, 1981, the treasurer stated that the contribution was made through secretarial error from PEP's funds, instead of the union's general fund, and that the \$25,000 would be reimbursed to PEP from the union's general fund (Attachment 4).

A telephone conversation was initiated by the Analyst on October 6, 1981, to inform the treasurer that the transfer of funds described in the letter would violate the Act, since voluntary and non-voluntary dollars would be commingled. The treasurer stated that voluntary and non-voluntary dollars would not be commingled, since the transfer from the union's general account back to PEP would be deposited in their educational/treasury ("non-voluntary") account. In addition, he stated that PEP maintains two bank accounts: a non-voluntary account and a voluntary account. The Analyst requested further written clarification regarding the questioned transfer and the flow of contributions to and from each account (Attachment 5).

^{1/} The \$25,000 contribution to the AFL-CIO COPE was not reported as being received and appears to have been designated to a non-Federal educational account.

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REPORTS ANALYSIS REFERRAL
UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL
EDUCATION PROGRAM
PAGE TWO

An additional amendment to the October Quarterly Report, dated October 7, 1981, confirmed the existence of the voluntary and non-voluntary accounts maintained by PEP (Attachment 6). Based upon a review of the amendment, a telephone call was made by the Analyst on October 15, 1981, to inform the treasurer that it would not be necessary to continue reporting the non-voluntary account activity, and that the 1981 Year End Report should not include this activity (Attachment 7).

On November 4, 1981, an RFAI was sent on the amended October Quarterly Report, to obtain more specific information on the usage of the non-voluntary account (Attachment 8). In addition, RFAI's were sent on the 1980 July Quarterly, 30 Day Post-General and amended Year End Reports to request for the proper categorization of receipts (Attachment 9). Responses were not received and therefore a second notice was mailed on November 27, 1981 for all four (4) reports (Attachment 10).

The Analyst initiated a telephone conversation on February 4, 1982, to determine if the RFAI's and the second notice had been received. The treasurer stated that he did not know if the letters had been received, and asked that additional copies be provided (Attachment 11). The additional copies were mailed on February 4, 1982. A notice was also included which requested that, if the amendments could not be supplied within one week, a letter explaining the efforts being made to comply and the approximate date of the responses should be provided (Attachment 12).

The Analyst initiated a telephone call on February 10, 1982, to determine if the copies of the RFAI's had been received. The secretary to the treasurer stated that they had been received and that it was her understanding that the amendments would be filed within a short period of time (Attachment 13).

PEP submitted additional amendments for the 1980 July Quarterly, October Quarterly, 30 Day Post-General and Year End Reports on February 16, 1982 (Attachment 14). Additional clarification as to the usage of the non-voluntary account and voluntary account was provided. The receipt of non-voluntary funds was reported separately on Line 17, and supporting Schedule B for Line 21 was amended to show which disbursements were made from the non-voluntary account and voluntary account.^{2/} However, PEP did

^{2/} Disbursements for non-Federal purposes should actually be reported on Line 27 of FEC Form 3X.

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REPORTS ANALYSIS REFERRAL
UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL
EDUCATION PROGRAM
PAGE THREE

not specifically note on Schedule B for Line 21, Page 2 of the October Quarterly Report, which account was used for contributions to Federal candidates (See Attachment 14, Page 9). Furthermore, PEP did not clarify whether other reports disclosed activity from the two accounts.

Similar problems have continued on the 1981-82 reports filed by PEP. The 1981 Mid-Year Report disclosed a total of \$27,302.81 received during the reporting period, but failed to properly list the receipts on the Detailed Summary Page. As a result of this omission, the source and/or categorization of the receipts could not be ascertained (Attachment 15). In addition, the October Quarterly and Year End Reports disclosed receipts from PEP's non-voluntary account (Attachments 16 and 17, respectively). The Year End Report also disclosed disbursements made from the non-voluntary account, which included a \$500 contribution to the Citizens for David Obey Committee (candidate for U.S. Congress, 7th District of Wisconsin).

The 1982 April Quarterly Report disclosed receipts and disbursements of the non-voluntary account, inadequate categorization of receipts, and a discrepancy between the beginning cash figure of this report and the ending cash figure of the Year End Report (Attachment 18).

On June 30, 1982, RFAI's were sent to PEP regarding these matters (Attachment 19). The RFAI's advised the committee to delete the non-voluntary account from its reports, since it is only necessary to disclose the activity relating to the voluntary account. In addition, the RFAI for the 1981 Year End Report advised PEP to request a full refund from the Citizens for David Obey Committee, because the contribution to that committee appeared to have been made from PEP's non-voluntary account (a prohibited contribution).

On July 9, 1982, a representative of PEP called to seek clarification regarding the RFAI's (Attachment 20). During the conversation, the Analyst was informed that: a) the contribution to the Citizens for Obey Committee was erroneously made from the non-voluntary fund; b) the \$27,302.81 received during the Mid Year reporting period represented individual contributions, none of which aggregated in excess of \$200; and c) the activity regarding the non-voluntary account represented actual transfers of funds. With respect to the latter point, the representative explained that undesignated transfers from local unions are deposited into the non-voluntary account. A transfer to the voluntary account is made if it is subsequently determined that the funds were intended to be

REPORTS ANALYSIS REFERRAL
UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL
EDUCATION PROGRAM
PAGE FOUR

designated for the voluntary account. In addition, the representative stated that, rather than requesting a refund of \$500 from the Citizens for David Obey Committee, PEP would prefer to transfer \$500 from the voluntary to the non-voluntary account.

The Analyst initiated a follow-up conversation on July 12, 1982, in order to suggest procedures for rectifying the problems (Attachment 21). The Analyst recommended that an escrow account be established for the purpose of depositing undesignated transfers from local unions. This procedure would provide PEP with a ten (10) day period to determine in which account (i.e., voluntary or non-voluntary) the funds should be deposited.^{3/} PEP was also advised that, instead of transferring \$500 from the voluntary to the non-voluntary account, it should seek a refund of the contribution directly from the Citizens for David Obey Committee.

Amendments to the 1981-82 reports were received at the Commission on July 20, 1982 (Attachment 22). As suggested in the RFAI's, the non-voluntary account activity was deleted from PEP's reports.

IV. OTHER PENDING ACTIONS INITIATED BY RAD:

There are no outstanding Requests for Additional Information or matters requiring to be referred at this time.

^{3/} The suggested procedure, which was utilized by the Kennedy for President Committee, was based upon 11 C.F.R. 103.3(b)(1) & (2), which require that a political committee determine the legality of contributions received. Those which cannot be determined to be legal are required to be refunded within a reasonable time.

ATTACHMENT 2: REQUEST FOR GUIDANCE

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RECEIVED
OFFICE OF THE
COMMISSIONER SECRETARY

Thomas



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20541

82 SEP 27 P 4: 55

SUBMITTED LATE

SENSITIVE

September 27, 1982

MEMORANDUM

EXECUTIVE SESSION

TO: The Commission

SEP 28 1982

FROM: Charles N. Steele
General Counsel *CNS*

SUBJECT: Errata - RAD Referral 82L-11, United Paper
Workers International Union Political Education
Program

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Footnote #1 of the above-referenced matter is in error. A RAD Request for Guidance concerning this committee, dated September 22, 1981, raised the possibility that certain expenditures may have been excessive contributions. It is also possible that the reported expenditures--or at least some of them--were permissible internal communication costs. Subsequent to making the request for guidance, RAD notified us on November 25, 1981 that the committee was going to be recommended for a 438(b) audit, and the request for guidance was held pending review of that document. On June 24, 1982, we were notified that an audit referral was not forthcoming and that a RAD Referral would be made. Footnote #1 concerning the RAD Referral should reflect that. The questions raised in the original RAD Request for Guidance should be incorporated into the recommendation to open a MUR as to this committee.

Attachments



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 22, 1981

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL, OFFICE OF GENERAL COUNSEL

THROUGH: B. ALLEN CLUTTER
STAFF DIRECTOR

FROM: *[Signature]* JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT: REQUEST FOR GUIDANCE - CLARIFICATION OF PARTISAN COMMUNICATION
TO MEMBERS

This memorandum is to request guidance in the following situation. The United Paperworkers International Union Political Education Program (UPIUEP) reported four disbursements indicating support for Senator Kennedy's Presidential Campaign and one direct contribution to the Kennedy for President Committee. An RFAI was sent to the committee on June 17, 1981, advising the committee of a possible 441(a) violation, and requesting clarification as to the nature of the expenditures. (see attachment 1)

The committee responded on June 25, 1981, stating that four of the questioned expenditures were communications to their membership made in accordance with 11 C.F.R. 114.1(a)(2)(ii)(sic). (see attachment 2)

While separate segregated funds do not appear to be prohibited from paying for partisan communications to their membership (see 11 C.F.R. 114.3(c)(1)(i)), would such payments be considered activity exempt from the definition of expenditure (see 2 U.S.C. 431(9)(B)(iii) and 11 C.F.R. 100.8(b)(4)) or would such payments be considered activity subject to the limitations of 2 U.S.C. 441(a)? It is noted that two of the four disbursements appear to be either in-kind contributions or independent expenditures rather than possible communications costs.

Your prompt attention to this matter is appreciated. If you need further information, please call Mike Tangney at 357-0026.

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816-7
cc: KAG



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 17, 1981

Nicholas C. Vrataric, Treasurer
United Paperworkers
International Union Political
Education Program
16303 Horace Harding Expwy.
Flushing, NY 11365

Identification No: C00002394

Reference: April Quarterly Report (1/1/80-3/31/80) and July Quarterly
Report (3/31/80-6/30/80)

Dear Mr. Vrataric:

This letter is prompted by the Commission's preliminary review of your April Quarterly and July Quarterly Reports. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Schedule B of your report (pertinent portion attached) discloses contributions which appear to exceed the limits set forth in 2 U.S. C. 441a. The Act precludes multicandidate committees from making contributions to a candidate for Federal office in excess of \$5,000 per election. Some of your expenditures appear to be made on behalf of Senator Kennedy's Presidential Campaign as contributions in-kind advocating the election of a clearly identified candidate. This activity may be subject to your committee's limitations. If you have made excessive contributions, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$5,000. (Any refund itemized on Schedule A should be reported on Line 16 of the Detailed Summary Page of your next report.)

If you find the contributions in question were disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the excessive contribution, prompt action by you to obtain a refund will be taken into consideration by the Commission. The recipient of the excessive contribution is also being informed of this matter.

II(3)

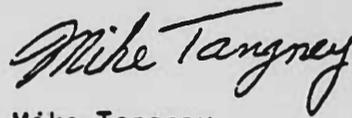
33040400239

Nicholas C. Vratario
United Paperworkers
International Union Political
Education Program

2

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,



Mike Tangney
Reports Analyst
Reports Analysis Division

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Commission

20463

Loans, Loan Repayments and Refunds Made) Reporting Lines 20a, 21a, and 22a, 21b, and 22b, and 2 of FEC FORM 3

(Use Separate Schedules for each numbered line)

Candidate or Committee in Full

United Paperworkers International Union Political Education Program

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Kennedy For President 2550 M Street, N.W. Washington, DC 20037	Ted Kennedy's campaign for the Presidency Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	1/8/80	\$ 2,000.00
Phillip Burton For Congress P. O. Box 4200 San Francisco, CA 94101	Phillip Burton's campaign to be re-elected to the House of Rep., 6th District, Calif Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	1/16/80	500.00
Wenstrom Volunteer Committee c/o Neal Peterson 1730 M St., N.W. Suite 907 Washington, DC 20036	Gene Wenstrom's campaign to be elected to 7th Congressional District, Minnesota Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	1/17/80	250.00
Maine Sunday Telegram Kennedy Campaign Headquarters 14 Columbia Street Augusta, ME 04330	Cost of political ad in support of Kennedy sent to our members Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	1/23/80	1,517.04
Durkin for US Senate Committee Washington, DC	Support of John Durkin to be reelected Senator of New Hampshire Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	1/30/80	1,000.00
Bonker for Congress Committee P. O. Box 361 Olympia, WA 98507	Don Bonker's re-election to Congress, State of Washington Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	2/4/80	400.00
UPIU Local 75 Labor Committee for Kennedy, 112 Pleasant St. Berlin, NH 03570	Support for Ted Kennedy Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	2/22/80	500.00
Musto for Congress Committee c/o Michael Sincavage, Treas.	Raphael Musto's campaign to be elected to 11th Congressional District of Pennsylvania Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	2/27/80	100.00

SUBTOTAL of expenditures this page (optional) \$ 6,267.04

TOTAL this period (last page this line number only) \$

II(S)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committees.

Name of Committee (in Full)

United Paperworkers International Union Political Education Program

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Hillenbrand for Indiana Committee P.O. Box 1980 Batesville, IN 47006	Elect John Hillenbrand Governor of Indiana Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/21/80	\$ 250.00
B. Full Name, Mailing Address and ZIP Code U.A.W. International Union 1757 N. Street, N.W. Washington, DC 20036	Purpose of Disbursement New Hampshire Labor for Kennedy Literature Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/22/80	3,000.00
C. Full Name, Mailing Address and ZIP Code Bronwal Printing 7333 North Oak Park Ave. Niles, IL 60648	Purpose of Disbursement Kennedy Four Point Brochure for our members in Illinois Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/16/80	237.00
D. Full Name, Mailing Address and ZIP Code Edgar for Congress Committee 107 Woodlawn Ave. Brookall, PA 19008	Purpose of Disbursement Re-election of Congressman Edgar, Pennsylvania Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/1/80	250.00
E. Full Name, Mailing Address and ZIP Code Williams for Congress Committee Box 1980 Helena, MT 59601	Purpose of Disbursement Re-election of Congressman Pat Williams, Montana Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/6/80	250.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			-
TOTAL This Period (last page this line number only)			\$3,987.00



UNITED PAPERWORKERS INTERNATIONAL UNION

POLITICAL EDUCATION PROGRAM

01 JUL All: 35
Attachment 2

International Headquarters: 163-03 Horace Harding Expressway, Flushing, New York 11365

Telephone: 212-762-6000

WAYNE E. GLENN
President

GEORGE H. O'BEA, JR.
Vice President - PEP Director

NICHOLAS C. VRATARIC
Secretary-Treasurer

6/1/81

June 25, 1981

3X-A-QZ

3-1-80 - 6-30-80

Federal Election Commission
1325 K Street
Washington, DC 20463

Att: Mike Tangney, Reports Analyst
Identification No: C00002394

Gentlemen:

We have your letter of June 17th concerning our April and July Quarterly Reports for 1980.

Four of the disbursements you have circled were not fully explained. In accordance with Section 114.1, part (a), (2), subsection (ii), which says the term contribution and expenditures does not include communications by a labor organization to its members.

Therefore, please be advised of the following:

U.A.W. International Union, 4/22/80, several unions got together to jointly have some literature printed for distribution to their respective members only. This was not given to any committee.

Bronwal Printing, 4/16/80, was the printing of a letter sent to U.P.I.U. members only in Illinois.

Maine Sunday Telegram, 1/23/80, was an advertisement taken out addressed to U.P.I.U. members urging them to elect precinct delegates.

UPIU Local 75, 2/22/80, also was strictly used for transporting our (U.P.I.U.) members to the polls.

Hoping this explanation will clear the matter up, I am

Very truly,

Nicholas C. Vrataric,
Secretary-Treasurer

NCV:sg

cc: President W. Glenn
Vice President G. O'Bea

II(7)

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Handwritten notes and signatures at the bottom of the page.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 25, 1981

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: B. ALLEN CLUTTER *BAC*
STAFF DIRECTOR

FROM: JOHN D. GIBSON *J.D.G.*
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT: REQUEST FOR GUIDANCE DATED SEPTEMBER 22, 1981-CLARIFICATION OF
PARTISAN COMMUNICATIONS -UPDATE

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This memorandum is to provide additional information to the above-referenced Request for Guidance. On October 14, 1981, a telephone conversation occurred between Mr George H. O'Bea, Jr., the director of the United Paperworkers International Union Political Education Program (PEP) and Michael Tangney of the Reports Analysis Division. Mr. O'Bea stated that the communications costs that were disclosed in PEP's report had been made with non-voluntary funds. Subsequent conversations with PEP officers have confirmed that both voluntary and non-voluntary accounts have been included in reports of receipts and disbursements filed with the Commission.

PEP will be referred to the Audit Division for exceeding the non-compliance standards contained in the RAD Review and Referral Procedures. It is anticipated that a 438(b) audit will be considered by the Commission on December 16, 1981.



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

June 24, 1982

MEMORANDUM

TO : CHARLES N. STEELE
GENERAL COUNSEL

THROUGH : B. ALLEN CLUTTER *BAE*
STAFF DIRECTOR

FROM : JOHN D. GIBSON *JDG*
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT : UPDATE # 2 REGARDING REQUEST FOR GUIDANCE (81G-7)
CLARIFICATION OF PARTISAN COMMUNICATIONS

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On November 25, 1981, the Reports Analysis Division provided your office with additional information regarding a Request for Guidance on partisan communications made by the United Paperworkers International Union Political Education Program (copy attached). Although, at that point in time, we had anticipated an audit referral of the committee, further examination revealed that the requisite threshold had not been met as established in the RAD Review and Referral Procedures, and therefore an audit referral was not prepared. In addition, further information was being requested from the committee in an attempt to resolve some outstanding matters.

If you have any questions, please contact Mike Tangney or Michael Filler at 357-0026.

Attachment

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ATTACHMENT 3: LETTERS AND NOTIFICATIONS

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT United Paperworkers International
Union Political Education Program

MUR 1478
STAFF MEMBER
& TEL. NO.
White
202-523-4057

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

SUMMARY OF ALLEGATIONS

This matter involves the commingling of voluntary and non-voluntary funds by the United Paperworkers International Union Political Education Program ("PEP") and the United Paperworkers International Union ("U.P.I.U.") in violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i), a contribution to a federal candidate by the U.P.I.U. in violation of 2 U.S.C. § 441b(a), and a violation of 2 U.S.C. § 441b(a) by the U.P.I.U. in connection with an advertisement in the Maine Sunday Telegram.

FACTUAL AND LEGAL ANALYSIS

1. The Facts

(a) Commingling of Voluntary and Non-Voluntary Funds

The 1980 October Quarterly Report of PEP disclosed a contribution to the Committee on Political Education, AFL-CIO,

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on September 26, 1980, which totalled \$25,000. 1/ A Request for Additional Information ("RFAI"), questioning whether this constituted an excessive contribution, was mailed to PEP on August 26, 1981, and a second notice was sent on September 18, 1981. In a response dated September 23, 1981, PEP's treasurer stated that the contribution was made through secretarial error from PEP's funds, instead of the union's general fund, and that the \$25,000 would be reimbursed to PEP from the union's general fund.

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A telephone conversation was initiated by a staff member of the Reports Analysis Division on October 6, 1981, to inform the treasurer that the transfer of funds described in his September 23, 1981, letter was impermissible, since voluntary and non-voluntary dollars would be commingled. The treasurer stated that voluntary and non-voluntary dollars would not be commingled in that the transfer from the union's general account to PEP would be deposited in their educational/treasury ("non-voluntary") account. He explained that PEP maintains two bank accounts, a non-voluntary account and a voluntary account, and that voluntary contributions from local unions' members are deposited into the voluntary account.

1/ The \$25,000 contribution to the AFL-CIO COPE was not reported by the AFL-CIO's registered political committee as being received and appears to have been designated to a non-Federal educational account.

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An additional amendment to the October Quarterly Report, dated October 7, 1981, confirmed the existence of the voluntary and non-voluntary accounts maintained by PEP. 2/ The response explained that the two funds are kept in separate bank accounts, and copies of blank checks evidencing the existence of the two accounts were submitted. The letter also stated that any money which is received but which is not clearly spelled out as voluntary money is automatically put into the educational account ("non-voluntary"), and the two accounts are not commingled. (But see below).

On October 15, 1981, PEP's treasurer was informed by telephone by staff of the Reports Analysis Division that it would not be necessary to continue reporting the activity of the non-voluntary account, and that the 1981 Year End Report should not include this activity. On November 4, 1981, an RFAI was sent on the amended October Quarterly Report to obtain more specific information on the usage of the non-voluntary account. In addition, RFAI's were sent on the 1980 July Quarterly, 30 Day Post-General and amended Year End Reports to request the proper categorization of receipts. Responses were not received and,

2/ According to the treasurer, the amendment "shows a deletion of the \$25,000 contribution issued to COPE." The treasurer further explained that while "the Union Executive Board voted to make a contribution of \$25,000 to COPE out of the Union's General Fund for educational purposes," the check was erroneously "issued on the UPIU Political Education Program from its Educational Account (non-voluntary)." Included with the response was a copy of a \$25,000 check, dated September 25, 1981, drawn on the account of the United Paperworkers International Union ("U.P.I.U."), and payable to the Political Education Program.

III (3)

therefore, a second notice was mailed on November 27, 1981, for all four reports.

PEP submitted additional amendments for the 1980 July Quarterly, October Quarterly, 30 Day Post-General and Year End Reports on February 16, 1982. The receipt of non-voluntary funds was reported separately on Line 17 ("other receipts"), and supporting Schedule B's for Line 21 ("contributions to federal candidates and other political committees") were amended to show which disbursements were made from the non-voluntary account and voluntary account. However, PEP did not specifically note on Schedule B for Line 21, Page 2 of the October Quarterly Report, which account was used to make contributions to nine federal candidates totalling \$5,400. ^{3/} Furthermore, PEP did not clarify whether other reports disclosed activity from both accounts.

The three reports filed by PEP during 1981, the Mid-Year Report (1/1/81 - 6/30/81), October 15 Report (6/30/81 - 9/30/81), and the Year-End Report (10/1/81 - 12/31/81), included the activity of both of PEP's accounts. The Year-End Report also disclosed a \$500 contribution to the Citizens for David Obey Committee (candidate for U.S. Congress, 7th District of Wisconsin) from PEP's non-voluntary account, dated December 16,

^{3/} A letter accompanying the 1980 October Quarterly amendment stated that with respect to the filing, the receipts had been separated according to the two funds and that "[a]ll funds deposited in both accounts have been deposited and disbursed in accordance with the FEC regulations."

III (4)

1981. 4/

The 1982 April Quarterly Report disclosed receipts and disbursements of the non-voluntary account, including a discrepancy between the beginning cash figure of this report, and the ending cash figure of the Year End Report. On June 30, 1982, RFAI's were sent to PEP regarding its 1981-82 reports which, among other things, advised the committee to delete the non-voluntary account from its reports, and to request a full refund from the Citizens for David Obey Committee because the contribution to that committee appeared to have been made from PEP's non-voluntary account.

On July 9, 1982, a representative of PEP called to seek clarification regarding the RFAI's. During the conversation, the representative stated that the contribution to the Citizens for David Obey Committee was erroneously made from the non-voluntary fund, and that the discrepancy between cash-on-hand figures was a result of PEP's accounting system for depositing transfers from local unions. With respect to the latter point, the representative explained that undesignated transfers from local unions are deposited into the non-voluntary account. A transfer to the voluntary account is made if it is subsequently determined that the funds were intended to be designated for the voluntary account. In addition, the representative stated that rather

4/ The Citizens for David Obey Committee reported the receipt of a \$500 contribution from PEP on December 22, 1981.

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III (5)

than requesting a refund of \$500 from the Citizens for David Obey Committee, PEP would prefer to transfer \$500 from the voluntary to the non-voluntary account.

Staff of the Reports Analysis Division initiated a follow-up conversation with PEP representatives on July 12, 1982, in order to suggest procedures for rectifying the problems, and recommended that an escrow account be established for the purpose of depositing undesignated transfers from local unions which would provide PEP with a ten day period to determine into which account (i.e., voluntary or non-voluntary) the funds should be deposited. PEP was also advised that instead of transferring \$500 from the voluntary to the non-voluntary account, it should seek a refund of the contribution directly from the Citizens for David Obey Committee.

Amendments to the 1981-82 reports were received at the Commission on July 20, 1982. As suggested in the RFAI's, the non-voluntary account activity was deleted from PEP's reports. After deleting the activity of this account, PEP's 1981 July Quarterly Report no longer reflects a disbursement (\$830.54) to the Sheraton-Carlton Hotel on May 21, 1981, for a "luncheon for Sen. George Mitchell, Maine," thereby suggesting that this disbursement was made from PEP's non-voluntary account.

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(b) Disbursements related to Senator Kennedy's Presidential bid.

The 1980 April Quarterly and July Quarterly Reports of PEP reported five disbursements apparently related to Senator Kennedy's Presidential campaign. One of the disbursements, dated January 8, 1980, is reported as a direct \$2,000 contribution to the Kennedy for President Committee. The other disbursements were reported as follows: \$1,517.04 on January 23, 1980, to "Maine Sunday Telegram, Kennedy Campaign Headquarters, 13 Columbia Street, Augusta, Maine," for "cost of political ad in support of Kennedy sent to our members"; \$500 on February 22, 1980, to "UPIU Local 75 Labor Committee for Kennedy" for "support for Ted Kennedy"; \$3,000 on April 22, 1980, to the U.A.W. International Union for "New Hampshire Labor for Kennedy Literature"; and, \$237 on April 16, 1980, to Bronwal Printing for "Kennedy Four Point Brochure for our members in Illinois."

On June 17, 1981, the Reports Analysis Division mailed an RFAI to PEP which notified them that the five disbursements discussed above, when aggregated, appeared to exceed the limits of 2 U.S.C. § 441a. The RFAI noted that some of the "expenditures appear to be made on behalf of Senator Kennedy's Presidential Campaign as contributions in-kind advocating the election of a clearly identified candidate." By letter dated June 25, 1981, the treasurer

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of PEP responded to the RFAI and described in greater detail the purpose of four of the disbursements and suggested that they constitute communication costs which are exempt from the definition of contribution and expenditure pursuant to 11 C.F.R. § 114.1(a). With respect to the disbursement to the U.A.W. International Union, the treasurer stated that several unions jointly printed some literature for distribution to their respective members, and that it was not given to any committee. The disbursement to Bronwal Printing was explained as "the printing of a letter sent to U.P.I.U. members only in Illinois," and the disbursement to the Maine Sunday Telegram as "an advertisement taken out addressed to U.P.I.U. members urging them to elect precinct delegates." Finally, the disbursement to U.P.I.U. Local 75 was described as being "strictly used for transporting our (U.P.I.U.) members to the polls." On October 14, 1981, the director of PEP informed a staff member of the Reports Analysis Division by telephone that the communication costs disclosed in PEP's reports had been paid for with non-voluntary funds. An amendment to PEP's July 15, 1980, Quarterly Report (filed on February 16, 1982), however, lists the disbursement to Bronwal Printing (\$237) as having been made from PEP's voluntary account. 5/

5/ The amendment reported the \$3,000 disbursement to the U.A.W. International Union on April 22, 1980, as having been drawn on the non-voluntary account.

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III(8)

2. The law applicable

A political committee which finances activity in connection with both federal and non-federal elections may establish a separate federal account into which only funds subject to the prohibitions and limitations of the Act may be deposited. All disbursements, contributions, expenditures and transfers by the committee in connection with any federal election shall be made from its federal account. No transfers may be made to such federal account from any other account maintained by such organization for the purpose of financing activity in connection with non-federal elections. 11 C.F.R. § 102.5(a)(1)(i).

Pursuant to 2 U.S.C. § 441b(a), a labor organization may not make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or a Representative in Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices.

For purposes of 2 U.S.C. § 441b(a), the term "contribution or expenditure" is defined at 2 U.S.C. § 441b(b)(2) and 11 C.F.R. § 114.1(a)(1) to include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money or anything of value to any candidate, campaign committee, political party or committee, organization, or any other person in

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connection with a federal election. The term "contribution or expenditure" does not include communications by a labor organization to its members on any subject. 2 U.S.C. § 441b(b) (2) (A) and 11 C.F.R. § 114.1(a) (2) (i).

Section 431(9)(B)(iii) of Title 2, United States Code, provides that the term "expenditure" does not include any communication by any membership organization to its members if such membership organization is not organized primarily for the purpose of influencing the nomination for election, or election, of any individual to Federal office, except that the costs incurred by a membership organization (including a labor organization) directly attributable to a communication expressly advocating the election or defeat of a clearly identified candidate (other than a communication devoted to subjects other than the express advocacy of the election or defeat of a clearly identified candidate), shall, if such costs exceed \$2,000 for any election, be reported to the Commission in accordance with 2 U.S.C. § 434(a)(4)(A)(i).

As set forth at 11 C.F.R. § 114.3(a), a labor organization may make partisan communications in connection with a federal election to its members and their families. The manner in which partisan communications may be made includes, but is not limited to, the distribution of printed material of a partisan nature

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III(10)

by a labor organization to its members and their families, provided that the material is produced at the expense of the labor organization or its separate segregated fund, and that the material constitutes a communication of the views of the labor organization and is not simply the republication or reproduction in whole or in part, of any broadcast transcript or tape or any written, graphic, or other form of campaign materials prepared by the candidate, his or her campaign committees, or their authorized agents. 11 C.F.R. § 114.3(c)(1)(i) and (ii).

Partisan communications may also include a labor organization's transportation of its members and their families to the polls. 11 C.F.R. § 114.3(c)(4).

The term "contribution" is defined at 2 U.S.C. § 431(8)(A) to include any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. The term "expenditure" is defined at 2 U.S.C. § 431(9)(A) to include any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for federal office.

As set forth at 2 U.S.C. § 441a(a)(2)(A) no multicandidate political committee shall make contributions to any candidate and his authorized political committees with respect to any election for federal office which, in the aggregate, exceed \$5,000.

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3. Application of the law to the commingling problem.

The first issue involved herein, concerning the commingling of funds, arises from the fact that PEP maintains two accounts -- a voluntary account, which is used to finance federal elections, and a non-voluntary account which appears to be used in substantial part to support state and local candidates. While PEP may maintain two separate accounts, PEP may not transfer funds from its non-voluntary account into its voluntary account. PEP, however, uses its non-voluntary account as an informal "escrow" account to hold funds from local unions' members which are undesignated; if it is subsequently determined that the funds represent voluntary contributions, they are transferred to the voluntary account. Such activity constitutes the commingling of union and voluntary funds and the impermissible transference of funds, in violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i). As PEP has been reporting the activity of both of its accounts since at least 1980, this commingling would seem to have commenced sometime prior to 1980, and appears to be current practice as well. Hence, the General Counsel recommends that the Commission find reason to believe that the U.P.I.U. and PEP have violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i).

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4. Application of the law to the disbursements to candidates from the non-voluntary account

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The information available thus far indicates that the non-voluntary account of PEP was used to contribute to at least one federal candidate, David Obey. Which of PEP's two accounts was used to support nine other federal candidates is not known. PEP has acknowledged that its non-voluntary account was the source of the funds which were contributed to the Obey campaign. Although PEP has offered to transfer an amount equal to the Obey contribution from its voluntary account to its non-voluntary account, it is not clear whether such has occurred. (PEP has not reported a refund from Citizens for David Obey). It is the position of the General Counsel that the refund of the contribution or the transfer of funds between PEP's two accounts, would serve only to mitigate the violation. In that the non-voluntary account is comprised of union funds and such funds were contributed to the Obey campaign, there is reason to believe, in the General Counsel's view, that the U.P.I.U. violated 2 U.S.C. § 441b(a).

There is insufficient evidence, in the General Counsel's view, to make a reason to believe finding at this time concerning

the disbursement from the non-voluntary fund for a luncheon for Senator Mitchell. While the expense was incurred several months after the Senator announced his intention to seek reelection, the Mitchell for Senate Committee did not report the receipt of an in-kind contribution from PEP, thereby suggesting that the event may have been unrelated to the Senator's reelection campaign. See Advisory Opinion 1980-89, 1 Federal Election Campaign Financing Guide (CCH), ¶ 5537, at 10,644 (1980), and opinions cited therein.

5. Application of the law to the \$25,000 transfers.

As to the initial transfer of \$25,000 to the AFL-CIO COPE from PEP, such a transfer appears to have been permissible as the \$25,000 was drawn on the non-voluntary account of PEP and did not go to the separate segregated fund of the AFL-CIO. The subsequent reimbursement made by the U.P.I.U. to PEP also appears to have been permissible since the funds were deposited into PEP's non-voluntary account.

6. Application of the law to the disbursements in connection with the presidential campaign of Senator Kennedy

Although contradictory information has been provided by PEP, PEP appears to have made disbursements from both its voluntary and non-voluntary account in connection with Senator Kennedy's presidential bid. In the General Counsel's view, the disbursements from PEP's voluntary account were permissible, and one of the three disbursements from the non-voluntary account was not.

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account containing union funds, PEP claims that the disbursements were used to finance communications to U.P.I.U. members and that they therefore are not subject to the limitations of 2 U.S.C. § 441b(a). While the disbursements to the U.A.W. International Union and to U.P.I.U. Local #75 appear to have been for exempt partisan communications pursuant to 2 U.S.C. § 441b(b)(2)(A) and 11 C.F.R. § 114.3(a) 7/, it is the view of the General Counsel that there is reason to believe that the third disbursement at issue, apparently to the Maine Sunday Telegram, involves a violation of 2 U.S.C. § 441b(a) by the U.P.I.U.

Two factors are involved herein -- whether the disbursement to the Maine Sunday Telegram is in fact "in connection with any primary election or political convention or caucus held to select candidates" under 2 U.S.C. § 441b(a), and, if so, whether it should be considered exempt from the definition of expenditure pursuant to 2 U.S.C. § 441b(b)(2)(A). The disbursement to the Maine Sunday Telegram apparently financed an ad which urged the election of precinct delegates supporting Senator Kennedy. 8/

7/ These disbursements were for the distribution of pro-Kennedy literature to U.P.I.U. members, and the transportation of U.P.I.U. members to the polls.

8/ PEP's initial reporting of this disbursement listed the purpose as the "cost of a political ad in support of Kennedy sent to our members." It was the June 25, 1981, letter from the treasurer that described this as "an advertisement taken out addressed to U.P.I.U. members urging them to elect precinct delegates."

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In Maine the Democratic Party is structured such that precinct delegates, upon election at the local caucuses, proceed to the state convention where they elect delegates to the national nominating convention. ^{9/} The term "primary election" is defined at 11 C.F.R. § 100.2(c) (3) to include "an election which is held to select delegates to a national nominating convention." Since the precinct delegate elections select delegates to the state democratic convention in Maine which, in turn, will select delegates to the national nominating convention which has authority to nominate a presidential candidate, the U.P.I.U.'s payment for an ad urging the election of precinct delegates is a payment made "in connection with any primary election or political convention or caucus held to select candidate," in the General Counsel's view. See Advisory Opinion 1979-7, 1 Federal Election Campaign Financing Guide (CCH) ¶ 5396, at 10,408 (1979) (payments by corporation or labor organization for an "Affirmative Action Program" in selecting delegates to the national nominating convention would be prohibited); Advisory Opinion 1980-28, 1 Federal Election Campaign Financing Guide (CCH), ¶ 5477 at 10,538 (1980) (payment by local party committee for newspaper advertising which advocates the selection of certain delegates to attend the Republican National Convention is an expenditure under the Act.)

^{9/} Democratic caucuses are held during February of a presidential election year in Maine. The Democratic Party does not conduct a presidential preference primary in Maine.

III (17)

As to the second factor, it is the position of the General Counsel that the expenditure is subject to the prohibitions of the Act and does not involve an exempt communication by the U.P.I.U. to its members. General treasury monies may be used to finance partisan communications, but such communications may only reach union members and their families. Although the instant ad may have been aimed at union members, it reached beyond membership to the general public as the ad was placed in a general circulation newspaper. Thus, the expenditure does not appear to fall within the exemption of 2 U.S.C. § 441b(b) (2) (A). See Advisory Opinion 1978-102, 1 Federal Election Financing Guide (CCH), ¶ 5397, at 10,410 (1979). Accordingly, the General Counsel recommends that the Commission find reason to believe that the U.P.I.U. violated 2 U.S.C. § 441b(a) by making an expenditure in connection with a federal election. 10/

RECOMMENDATIONS

1. Find reason to believe the UPIU and PEP violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a) (1) (i) by transferring funds from an account containing non-voluntary monies to an account containing voluntary monies.
2. Find reason to believe the UPIU violated 2 U.S.C. § 441b(a) by contributing to the Citizens for David Obey Committee.
3. Find reason to believe the UPIU violated 2 U.S.C. § 441b(a) in connection with its advertisement in the Maine Sunday Telegram.

10/ PEP's initial reporting of this expenditure suggested a connection with the Kennedy campaign; however, information subsequently provided does not indicate that an an-kind contribution is involved.

III (13)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Nicholas C. Vrataric, Secretary-Treasurer
United Paperworkers International Union
Political Education Program
702 Church Street
P.O. Box 1475
Nashville, Tennessee 37202

Re: MUR 1478

Dear Mr. Vrataric:

On , 1982, the Commission determined that there is reason to believe that your committee, the United Paperworkers International Union Political Education Program, violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), and 11 C.F.R. § 102.5(a)(1)(i). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desire. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any

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Letter to Nicholas C. Vratovic
Page 2

notifications and other communications from the Commission.

The investigation now being conducted will be 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.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Maura White, the staff member assigned to this matter, at 202-523-4057.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT United Paperworkers International
Union

MUR 1478
STAFF MEMBER
& TEL. NO.
White
202-523-4057

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

SUMMARY OF ALLEGATIONS

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This matter involves the commingling of voluntary and non-voluntary funds by the United Paperworkers International Union Political Education Program ("PEP") and the United Paperworkers International Union ("U.P.I.U.") in violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i), a contribution to a federal candidate by the U.P.I.U. in violation of 2 U.S.C. § 441b(a), and a violation of 2 U.S.C. § 441b(a) by the U.P.I.U. in connection with an advertisement in the Maine Sunday Telegram.

FACTUAL AND LEGAL ANALYSIS

1. The Facts

(a) Commingling of Voluntary and Non-Voluntary Funds

The 1980 October Quarterly Report of PEP disclosed a contribution to the Committee on Political Education, AFL-CIO,

on September 26, 1980, which totalled \$25,000. 1/ A Request for Additional Information ("RFAI"), questioning whether this constituted an excessive contribution, was mailed to PEP on August 26, 1981, and a second notice was sent on September 18, 1981. In a response dated September 23, 1981, PEP's treasurer stated that the contribution was made through secretarial error from PEP's funds, instead of the union's general fund, and that the \$25,000 would be reimbursed to PEP from the union's general fund.

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A telephone conversation was initiated by a staff member of the Reports Analysis Division on October 6, 1981, to inform the treasurer that the transfer of funds described in his September 23, 1981, letter was impermissible, since voluntary and non-voluntary dollars would be commingled. The treasurer stated that voluntary and non-voluntary dollars would not be commingled in that the transfer from the union's general account to PEP would be deposited in their educational/treasury ("non-voluntary") account. He explained that PEP maintains two bank accounts, a non-voluntary account and a voluntary account, and that voluntary contributions from local unions' members are deposited into the voluntary account.

1/ The \$25,000 contribution to the AFL-CIO COPE was not reported by the AFL-CIO's registered political committee as being received and appears to have been designated to a non-Federal educational account.

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An additional amendment to the October Quarterly Report, dated October 7, 1981, confirmed the existence of the voluntary and non-voluntary accounts maintained by PEP. 2/ The response explained that the two funds are kept in separate bank accounts, and copies of blank checks evidencing the existence of the two accounts were submitted. The letter also stated that any money which is received but which is not clearly spelled out as voluntary money is automatically put into the educational account ("non-voluntary"), and the two accounts are not commingled. (But see below).

On October 15, 1981, PEP's treasurer was informed by telephone by staff of the Reports Analysis Division that it would not be necessary to continue reporting the activity of the non-voluntary account, and that the 1981 Year End Report should not include this activity. On November 4, 1981, an RFAI was sent on the amended October Quarterly Report to obtain more specific information on the usage of the non-voluntary account. In addition, RFAI's were sent on the 1980 July Quarterly, 30 Day Post-General and amended Year End Reports to request the proper categorization of receipts. Responses were not received and,

2/ According to the treasurer, the amendment "shows a deletion of the \$25,000 contribution issued to COPE." The treasurer further explained that while "the Union Executive Board voted to make a contribution of \$25,000 to COPE out of the Union's General Fund for educational purposes," the check was erroneously "issued on the UPIU Political Education Program from its Educational Account (non-voluntary)." Included with the response was a copy of a \$25,000 check, dated September 25, 1981, drawn on the account of the United Paperworkers International Union ("U.P.I.U."), and payable to the Political Education Program.

therefore, a second notice was mailed on November 27, 1981, for all four reports.

PEP submitted additional amendments for the 1980 July Quarterly, October Quarterly, 30 Day Post-General and Year End Reports on February 16, 1982. The receipt of non-voluntary funds was reported separately on Line 17 ("other receipts"), and supporting Schedule B's for Line 21 ("contributions to federal candidates and other political committees") were amended to show which disbursements were made from the non-voluntary account and voluntary account. However, PEP did not specifically note on Schedule B for Line 21, Page 2 of the October Quarterly Report, which account was used to make contributions to nine federal candidates totalling \$5,400. 3/ Furthermore, PEP did not clarify whether other reports disclosed activity from both accounts.

The three reports filed by PEP during 1981, the Mid-Year Report (1/1/81 - 6/30/81), October 15 Report (6/30/81 - 9/30/81), and the Year-End Report (10/1/81 - 12/31/81), included the activity of both of PEP's accounts. The Year-End Report also disclosed a \$500 contribution to the Citizens for David Obey Committee (candidate for U.S. Congress, 7th District of Wisconsin) from PEP's non-voluntary account, dated December 16,

3/ A letter accompanying the 1980 October Quarterly amendment stated that with respect to the filing, the receipts had been separated according to the two funds and that "[a]ll funds deposited in both accounts have been deposited and disbursed in accordance with the FEC regulations."

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1981. 4/

The 1982 April Quarterly Report disclosed receipts and disbursements of the non-voluntary account, including a discrepancy between the beginning cash figure of this report and the ending cash figure of the Year End Report. On June 30, 1982, RFAI's were sent to PEP regarding its 1981-82 reports which, among other things, advised the committee to delete the non-voluntary account from its reports, and to request a full refund from the Citizens for David Obey Committee because the contribution to that committee appeared to have been made from PEP's non-voluntary account.

On July 9, 1982, a representative of PEP called to seek clarification regarding the RFAI's. During the conversation, the representative stated that the contribution to the Citizens for David Obey Committee was erroneously made from the non-voluntary fund, and that the discrepancy between cash-on-hand figures was a result of PEP's accounting system for depositing transfers from local unions. With respect to the latter point, the representative explained that undesignated transfers from local unions are deposited into the non-voluntary account. A transfer to the voluntary account is made if it is subsequently determined that the funds were intended to be designated for the voluntary account. In addition, the representative stated that rather

4/ The Citizens for David Obey Committee reported the receipt of a \$500 contribution from PEP on December 22, 1981.

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than requesting a refund of \$500 from the Citizens for David Obey Committee, PEP would prefer to transfer \$500 from the voluntary to the non-voluntary account.

Staff of the Reports Analysis Division initiated a follow-up conversation with PEP representatives on July 12, 1982, in order to suggest procedures for rectifying the problems, and recommended that an escrow account be established for the purpose of depositing undesignated transfers from local unions which would provide PEP with a ten day period to determine into which account (i.e., voluntary or non-voluntary) the funds should be deposited. PEP was also advised that instead of transferring \$500 from the voluntary to the non-voluntary account, it should seek a refund of the contribution directly from the Citizens for David Obey Committee.

Amendments to the 1981-82 reports were received at the Commission on July 20, 1982. As suggested in the RFAI's, the non-voluntary account activity was deleted from PEP's reports. After deleting the activity of this account, PEP's 1981 July Quarterly Report no longer reflects a disbursement (\$830.54) to the Sheraton-Carlton Hotel on May 21, 1981, for a "luncheon for Sen. George Mitchell, Maine," thereby suggesting that this disbursement was made from PEP's non-voluntary account.

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(b) Disbursements related to Senator Kennedy's Presidential bid.

The 1980 April Quarterly and July Quarterly Reports of PEP reported five disbursements apparently related to Senator Kennedy's Presidential campaign. One of the disbursements, dated January 8, 1980, is reported as a direct \$2,000 contribution to the Kennedy for President Committee. The other disbursements were reported as follows: \$1,517.04 on January 23, 1980, to "Maine Sunday Telegram, Kennedy Campaign Headquarters, 13 Columbia Street, Augusta, Maine," for "cost of political ad in support of Kennedy sent to our members"; \$500 on February 22, 1980, to "UPIU Local 75 Labor Committee for Kennedy" for "support for Ted Kennedy"; \$3,000 on April 22, 1980, to the U.A.W. International Union for "New Hampshire Labor for Kennedy Literature"; and, \$237 on April 16, 1980, to Bronwal Printing for "Kennedy Four Point Brochure for our members in Illinois."

On June 17, 1981, the Reports Analysis Division mailed an RFAI to PEP which notified them that the five disbursements discussed above, when aggregated, appeared to exceed the limits of 2 U.S.C. § 441a. The RFAI noted that some of the "expenditures appear to be made on behalf of Senator Kennedy's Presidential Campaign as contributions in-kind advocating the election of a clearly identified candidate." By letter dated June 25, 1981, the treasurer

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of PEP responded to the RFAI and described in greater detail the purpose of four of the disbursements and suggested that they constitute communication costs which are exempt from the definition of contribution and expenditure pursuant to 11 C.F.R. § 114.1(a). With respect to the disbursement to the U.A.W. International Union, the treasurer stated that several unions jointly printed some literature for distribution to their respective members, and that it was not given to any committee. The disbursement to Bronwal Printing was explained as "the printing of a letter sent to U.P.I.U. members only in Illinois," and the disbursement to the Maine Sunday Telegram as "an advertisement taken out addressed to U.P.I.U. members urging them to elect precinct delegates." Finally, the disbursement to U.P.I.U. Local 75 was described as being "strictly used for transporting our (U.P.I.U.) members to the polls." On October 14, 1981, the director of PEP informed a staff member of the Reports Analysis Division by telephone that the communication costs disclosed in PEP's reports had been paid for with non-voluntary funds. An amendment to PEP's July 15, 1980, Quarterly Report (filed on February 16, 1982), however, lists the disbursement to Bronwal Printing (\$237) as having been made from PEP's voluntary account. 5/

5/ The amendment reported the \$3,000 disbursement to the U.A.W. International Union on April 22, 1980, as having been drawn on the non-voluntary account.

2. The law applicable

A political committee which finances activity in connection with both federal and non-federal elections may establish a separate federal account into which only funds subject to the prohibitions and limitations of the Act may be deposited. All disbursements, contributions, expenditures and transfers by the committee in connection with any federal election shall be made from its federal account. No transfers may be made to such federal account from any other account maintained by such organization for the purpose of financing activity in connection with non-federal elections. 11 C.F.R. § 102.5(a)(1)(i).

Pursuant to 2 U.S.C. § 441b(a), a labor organization may not make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or a Representative in Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices.

For purposes of 2 U.S.C. § 441b(a), the term "contribution or expenditure" is defined at 2 U.S.C. § 441b(b)(2) and 11 C.F.R. § 114.1(a)(1) to include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money or anything of value to any candidate, campaign committee, political party or committee, organization, or any other person in

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connection with a federal election. The term "contribution or expenditure" does not include communications by a labor organization to its members on any subject. 2 U.S.C. § 441b(b) (2)(A) and 11 C.F.R. § 114.1(a)(2)(i).

Section 431(9)(B)(iii) of Title 2, United States Code, provides that the term "expenditure" does not include any communication by any membership organization to its members if such membership organization is not organized primarily for the purpose of influencing the nomination for election, or election, of any individual to Federal office, except that the costs incurred by a membership organization (including a labor organization) directly attributable to a communication expressly advocating the election or defeat of a clearly identified candidate (other than a communication devoted to subjects other than the express advocacy of the election or defeat of a clearly identified candidate), shall, if such costs exceed \$2,000 for any election, be reported to the Commission in accordance with 2 U.S.C. § 434(a)(4)(A)(i).

As set forth at 11 C.F.R. § 114.3(a), a labor organization may make partisan communications in connection with a federal election to its members and their families. The manner in which partisan communications may be made includes, but is not limited to, the distribution of printed material of a partisan nature

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by a labor organization to its members and their families, provided that the material is produced at the expense of the labor organization or its separate segregated fund, and that the material constitutes a communication of the views of the labor organization and is not simply the republication or reproduction in whole or in part, of any broadcast transcript or tape or any written, graphic, or other form of campaign materials prepared by the candidate, his or her campaign committees, or their authorized agents. 11 C.F.R. § 114.3(c)(1)(i) and (ii).

Partisan communications may also include a labor organization's transportation of its members and their families to the polls. 11 C.F.R. § 114.3(c)(4).

The term "contribution" is defined at 2 U.S.C. § 431(8)(A) to include any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. The term "expenditure" is defined at 2 U.S.C. § 431(9)(A) to include any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for federal office.

As set forth at 2 U.S.C. § 441a(a)(2)(A) no multicandidate political committee shall made contributions to any candidate and his authorized political committees with respect to any election for federal office which, in the aggregate, exceed \$5,000.

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3. Application of the law to the commingling problem.

The first issue involved herein, concerning the commingling of funds, arises from the fact that PEP maintains two accounts -- a voluntary account, which is used to finance federal elections, and a non-voluntary account which appears to be used in substantial part to support state and local candidates. While PEP may maintain two separate accounts, PEP may not transfer funds from its non-voluntary account into its voluntary account. PEP, however, uses its non-voluntary account as an informal "escrow" account to hold funds from local unions' members which are undesignated; if it is subsequently determined that the funds represent voluntary contributions, they are transferred to the voluntary account. Such activity constitutes the commingling of union and voluntary funds and the impermissible transference of funds, in violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i). As PEP has been reporting the activity of both of its accounts since at least 1980, this commingling would seem to have commenced sometime prior to 1980, and appears to be current practice as well. Hence, the General Counsel recommends that the Commission find reason to believe that the U.P.I.U. and PEP have violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i).

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4. Application of the law to the disbursements to candidates from the non-voluntary account

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The information available thus far indicates that the non-voluntary account of PEP was used to contribute to at least one federal candidate, David Obey. Which of PEP's two accounts was used to support nine other federal candidates is not known. PEP has acknowledged that its non-voluntary account was the source of the funds which were contributed to the Obey campaign. Although PEP has offered to transfer an amount equal to the Obey contribution from its voluntary account to its non-voluntary account, it is not clear whether such has occurred. (PEP has not reported a refund from Citizens for David Obey). It is the position of the General Counsel that the refund of the contribution or the transfer of funds between PEP's two accounts, would serve only to mitigate the violation. In that the non-voluntary account is comprised of union funds and such funds were contributed to the Obey campaign, there is reason to believe, in the General Counsel's view, that the U.P.I.U. violated 2 U.S.C. § 441b(a).

There is insufficient evidence, in the General Counsel's view, to make a reason to believe finding at this time concerning

the disbursement from the non-voluntary fund for a luncheon for Senator Mitchell. While the expense was incurred several months after the Senator announced his intention to seek reelection, the Mitchell for Senate Committee did not report the receipt of an in-kind contribution from PEP, thereby suggesting that the event may have been unrelated to the Senator's reelection campaign. See Advisory Opinion 1980-89, 1 Federal Election Campaign Financing Guide (CCH), ¶ 5537, at 10,644 (1980), and opinions cited therein.

5. Application of the law to the \$25,000 transfers.

As to the initial transfer of \$25,000 to the AFL-CIO COPE from PEP, such a transfer appears to have been permissible as the \$25,000 was drawn on the non-voluntary account of PEP and did not go to the separate segregated fund of the AFL-CIO. The subsequent reimbursement made by the U.P.I.U. to PEP also appears to have been permissible since the funds were deposited into PEP's non-voluntary account.

6. Application of the law to the disbursements in connection with the presidential campaign of Senator Kennedy

Although contradictory information has been provided by PEP, PEP appears to have made disbursements from both its voluntary and non-voluntary account in connection with Senator Kennedy's presidential bid. In the General Counsel's view, the disbursements from PEP's voluntary account were permissible, and one of the three disbursements from the non-voluntary account was not.

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As discussed above, PEP used its voluntary account to make a direct contribution to the Kennedy campaign (\$2,000) and to pay (\$237) for the distribution of pro-Kennedy literature to U.P.I.U. members. The General Counsel's position as to the permissibility of these disbursements, reflects the apparent fact that PEP's \$5,000 contribution limitation to the 1980 Kennedy campaign had not been exceeded and that only funds subject to the limitations and prohibitions of the Act were used for these disbursements. 6/ While it is clear that PEP made a "contribution" pursuant to 2 U.S.C. § 431(8)(A) of \$2,000 and such counts against its contribution limitation, there is no evidence at this juncture that there was any coordination with the Kennedy campaign regarding the \$237 disbursement and that it is therefore subject to limitation as an in-kind contribution. In any event, PEP's contribution limitation would still not have been exceeded. Nor is there any evidence at this juncture that the \$237 disbursement involved "express advocacy" such that it would have to be reported by PEP on Schedule E rather than Schedule B. The disbursement was in fact reported.

With respect to the three disbursements relating to Senator Kennedy's candidacy which were made from PEP's non-voluntary

6/ PEP was a qualified multicandidate committee at the time the contribution involved herein was made.

The FEC "G" Index of the Kennedy for President Committee lists the receipt of only a \$2,000 contribution from PEP, and a review of PEP's reports did not reveal any other contributions to the Kennedy for President Committee.

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account containing union funds, PEP claims that the disbursements were used to finance communications to U.P.I.U. members and that they therefore are not subject to the limitations of 2 U.S.C. § 441b(a). While the disbursements to the U.A.W. International Union and to U.P.I.U. Local #75 appear to have been for exempt partisan communications pursuant to 2 U.S.C. § 441b(b)(2)(A) and 11 C.F.R. § 114.3(a) 7/, it is the view of the General Counsel that there is reason to believe that the third disbursement at issue, apparently to the Maine Sunday Telegram, involves a violation of 2 U.S.C. § 441b(a) by the U.P.I.U.

Two factors are involved herein -- whether the disbursement to the Maine Sunday Telegram is in fact "in connection with any primary election or political convention or caucus held to select candidates" under 2 U.S.C. § 441b(a), and, if so, whether it should be considered exempt from the definition of expenditure pursuant to 2 U.S.C. § 441b(b)(2)(A). The disbursement to the Maine Sunday Telegram apparently financed an ad which urged the election of precinct delegates supporting Senator Kennedy. 8/

7/ These disbursements were for the distribution of pro-Kennedy literature to U.P.I.U. members, and the transportation of U.P.I.U. members to the polls.

8/ PEP's initial reporting of this disbursement listed the purpose as the "cost of a political ad in support of Kennedy sent to our members." It was the June 25, 1981, letter from the treasurer that described this as "an advertisement taken out addressed to U.P.I.U. members urging them to elect precinct delegates."

As to the second factor, it is the position of the General Counsel that the expenditure is subject to the prohibitions of the Act and does not involve an exempt communication by the U.P.I.U. to its members. General treasury monies may be used to finance partisan communications, but such communications may only reach union members and their families. Although the instant ad may have been aimed at union members, it reached beyond membership to the general public as the ad was placed in a general circulation newspaper. Thus, the expenditure does not appear to fall within the exemption of 2 U.S.C. § 441b(b) (2) (A). See Advisory Opinion 1978-102, 1 Federal Election Financing Guide (CCH), ¶ 5397, at 10,410 (1979). Accordingly, the General Counsel recommends that the Commission find reason to believe that the U.P.I.U. violated 2 U.S.C. § 441b(a) by making an expenditure in connection with a federal election. 10/

RECOMMENDATIONS

1. Find reason to believe the UPIU and PEP violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a) (1) (i) by transferring funds from an account containing non-voluntary monies to an account containing voluntary monies.
2. Find reason to believe the UPIU violated 2 U.S.C. § 441b(a) by contributing to the Citizens for David Obey Committee.
3. Find reason to believe the UPIU violated 2 U.S.C. § 441b(a) in connection with its advertisement in the Maine Sunday Telegram.

10/ PEP's initial reporting of this expenditure suggested a connection with the Kennedy campaign; however, information subsequently provided does not indicate that an an-kind contribution is involved.

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III(38)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Wayne E. Glenn, President
United Paperworkers International Union
702 Church Street
P.O. Box 1475
Nashville, Tennessee 37202

Re: MUR 1478

Dear Mr. Glenn:

On , 1982, the Federal Election Commission determined that there is reason to believe that the United Paperworkers International Union violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), and 11 C.F.R. § 102.5(a)(1)(i). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against the Union, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desire. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel

Letter to Wayne E. Glenn
Page 2

to receive any notifications and other communications from the Commission.

The investigation now being conducted will be 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.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Maura White, the staff member assigned to this matter, at 202-523-4057.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

83040400286

III(40)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
United Paper Workers International) RAD 82L-11
Union Political Education Program)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on September 29, 1982, do hereby certify that the Commission decided by a vote of 6-0 to open a Matter Under Review with respect to the above-captioned matter.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision.

Attest:

9-30-82

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

83040100237

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

82 SEP 27 P 4: 55

SUBMITTED LATE

SENSITIVE

September 27, 1982

MEMORANDUM

EXECUTIVE SESSION

TO: The Commission

SEP 28 1982

FROM: Charles N. Steele
General Counsel *CNS*

SUBJECT: Errata - RAD Referral 82L-11, United Paper
Workers International Union Political Education
Program

03040400238

Footnote #1 of the above-referenced matter is in error. A RAD Request for Guidance concerning this committee, dated September 22, 1981, raised the possibility that certain expenditures may have been excessive contributions. It is also possible that the reported expenditures--or at least some of them--were permissible internal communication costs. Subsequent to making the request for guidance, RAD notified us on November 25, 1981 that the committee was going to be recommended for a 438(b) audit, and the request for guidance was held pending review of that document. On June 24, 1982, we were notified that an audit referral was not forthcoming and that a RAD Referral would be made. Footnote #1 concerning the RAD Referral should reflect that. The questions raised in the original RAD Request for Guidance should be incorporated into the recommendation to open a MUR as to this committee.

Attachments



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 22, 1981

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL, OFFICE OF GENERAL COUNSEL

THROUGH: B. ALLEN CLUTTER
STAFF DIRECTOR

FROM: *John D. Gibson*
JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT: REQUEST FOR GUIDANCE - CLARIFICATION OF PARTISAN COMMUNICATION
TO MEMBERS

This memorandum is to request guidance in the following situation. The United Paperworkers International Union Political Education Program (UPIUEP) reported four disbursements indicating support for Senator Kennedy's Presidential Campaign and one direct contribution to the Kennedy for President Committee. An RFAI was sent to the committee on June 17, 1981, advising the committee of a possible 441(a) violation, and requesting clarification as to the nature of the expenditures. (see attachment 1)

The committee responded on June 25, 1981, stating that four of the questioned expenditures were communications to their membership made in accordance with 11 C.F.R. 114.1(a)(2)(ii)(sic). (see attachment 2)

While separate segregated funds do not appear to be prohibited from paying for partisan communications to their membership (see 11 C.F.R. 114.3(c)(1)(i)), would such payments be considered activity exempt from the definition of expenditure (see 2 U.S.C. 431(9)(B)(iii) and 11 C.F.R. 100.8(b)(4)) or would such payments be considered activity subject to the limitations of 2 U.S.C. 441(a)? It is noted that two of the four disbursements appear to be either in-kind contributions or independent expenditures rather than possible communications costs.

Your prompt attention to this matter is appreciated. If you need further information, please call Mike Tangney at 357-0026.

63040400235



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 17, 1981

Nicholas C. Vratovic, Treasurer
United Paperworkers
International Union Political
Education Program
16303 Horace Harding Expwy.
Flushing, NY 11365

Identification No: C00002394

Reference: April Quarterly Report (1/1/80-3/31/80) and July Quarterly
Report (3/31/80-6/30/80)

Dear Mr. Vratovic:

This letter is prompted by the Commission's preliminary review of your April Quarterly and July Quarterly Reports. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Schedule B of your report (pertinent portion attached) discloses contributions which appear to exceed the limits set forth in 2 U.S. C. 441a. The Act precludes multicandidate committees from making contributions to a candidate for Federal office in excess of \$5,000 per election. Some of your expenditures appear to be made on behalf of Senator Kennedy's Presidential Campaign as contributions in-kind advocating the election of a clearly identified candidate. This activity may be subject to your committee's limitations. If you have made excessive contributions, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$5,000. (Any refund itemized on Schedule A should be reported on Line 16 of the Detailed Summary Page of your next report.)

If you find the contributions in question were disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the excessive contribution, prompt action by you to obtain a refund will be taken into consideration by the Commission. The recipient of the excessive contribution is also being informed of this matter.

83040400290

Nicholas C. Vrataric
United Paperworkers
International Union Political
Education Program

2

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,



Mike Tangney
Reports Analyst
Reports Analysis Division

83040400291

Candidate or Committee in Full

United Paperworkers International Union Political Education Program

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Kennedy For President 2550 M Street, N.W. Washington, DC 20037	Ted Kennedy's campaign for the Presidency	1/8/80	\$ 2,000.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Phillip Burton For Congress P. O. Box 4200 San Francisco, CA 94101	Phillip Burton's campaign to be re-elected to the House of Rep., 6th District, Calif	1/16/80	500.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Wenstrom Volunteer Committee c/o Neal Peterson 1730 M St., N.W. Suite 907 Washington, DC 20036	Gene Wenstrom's campaign to be elected to 7th Congressional District of Minnesota	1/17/80	250.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Maine Sunday Telegram Kennedy Campaign Headquarters 14 Columbia Street Augusta, ME 04330	Cost of political ad in support of Kennedy sent to our members	1/23/80	1,517.04
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Durkin for US Senate Committee Washington, DC	Support of John Durkin to be reelected Senator of New Hampshire	1/30/80	1,000.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Bonker for Congress Committee P. O. Box 361 Olympia, WA 98507	Don Bonker's re-election to Congress, State of Washington	2/4/80	400.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
UPIU Local 75 Labor Committee for Kennedy, 112 Pleasant St. Berlin, NH 03570	Support for Ted Kennedy	2/22/80	500.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Musto for Congress Committee c/o Michael Sincavage, Treas.	Raphael Musto's campaign to be elected to 11th Congressional District of Pennsylvania	2/27/80	100.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		

SUBTOTAL of expenditures this page (optional) \$ 6,267.04

TOTAL this period (last page this line number only) \$

0
7
9
5
3
0
0
3

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

United Paperworkers International Union Political Education Program

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Hillenbrand for Indiana Committee P.O. Box 1980 Batesville, IN 47006	Elect John Hillenbrand Governor of Indiana Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/21/80	\$ 250.00
B. Full Name, Mailing Address and ZIP Code U.A.W. International Union 1757 N. Street, N.W. Washington, DC 20036	New Hampshire Labor for Kennedy Literature Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/22/80	3,000.00
C. Full Name, Mailing Address and ZIP Code Bronwal Printing 7333 North Oak Park Ave. Niles, IL 60648	Kennedy Four Point Brochure for our members in Illinois Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/16/80	237.00
D. Full Name, Mailing Address and ZIP Code Edgar for Congress Committee 107 Woodlawn Ave. Broomall, PA 19008	Re-election of Congressman Edgar, Pennsylvania Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/1/80	250.00
E. Full Name, Mailing Address and ZIP Code Williams for Congress Committee Box 1980 Helena, MT 59601	Re-election of Congressman Pat Williams, Montana Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/6/80	250.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)	-
TOTAL This Period (last page this line number only)	\$3,987.00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 25, 1981

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: B. ALLEN CLUTTER *BAC*
STAFF DIRECTOR

FROM: JOHN D. GIBSON *J.D.G.*
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT: REQUEST FOR GUIDANCE DATED SEPTEMBER 22, 1981-CLARIFICATION OF
PARTISAN COMMUNICATIONS -UPDATE

This memorandum is to provide additional information to the above-referenced Request for Guidance. On October 14, 1981, a telephone conversation occurred between Mr George H. O'Bea, Jr., the director of the United Paperworkers International Union Political Education Program (PEP) and Michael Tangney of the Reports Analysis Division. Mr. O'Bea stated that the communications costs that were disclosed in PEP's report had been made with non-voluntary funds. Subsequent conversations with PEP officers have confirmed that both voluntary and non-voluntary accounts have been included in reports of receipts and disbursements filed with the Commission.

PEP will be referred to the Audit Division for exceeding the non-compliance standards contained in the RAD Review and Referral Procedures. It is anticipated that a 438(b) audit will be considered by the Commission on December 16, 1981.

33040400295



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 24, 1982

MEMORANDUM

TO : CHARLES N. STEELE
GENERAL COUNSEL

THROUGH : B. ALLEN CLUTTER *ae*
STAFF DIRECTOR

FROM : JOHN D. GIBSON *gd*
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT : UPDATE # 2 REGARDING REQUEST FOR GUIDANCE (81G-7)
CLARIFICATION OF PARTISAN COMMUNICATIONS

On November 25, 1981, the Reports Analysis Division provided your office with additional information regarding a Request for Guidance on partisan communications made by the United Paperworkers International Union Political Education Program (copy attached). Although, at that point in time, we had anticipated an audit referral of the committee, further examination revealed that the requisite threshold had not been met as established in the RAD Review and Referral Procedures, and therefore an audit referral was not prepared. In addition, further information was being requested from the committee in an attempt to resolve some outstanding matters.

If you have any questions, please contact Mike Tangney or Michael Filler at 357-0026.

Attachment

33040400296



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 25, 1981

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: B. ALLEN CLUTTER
STAFF DIRECTOR

FROM: JOHN D. GIBSON *JD*
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT: REQUEST FOR GUIDANCE DATED SEPTEMBER 22, 1981-CLARIFICATION OF
PARTISAN COMMUNICATIONS -UPDATE

This memorandum is to provide additional information to the above-referenced Request for Guidance. On October 14, 1981, a telephone conversation occurred between Mr George H. O'Bea, Jr., the director of the United Paperworkers International Union Political Education Program (PEP) and Michael Tangney of the Reports Analysis Division. Mr. O'Bea stated that the communications costs that were disclosed in PEP's report had been made with non-voluntary funds. Subsequent conversations with PEP officers have confirmed that both voluntary and non-voluntary accounts have been included in reports of receipts and disbursements filed with the Commission.

PEP will be referred to the Audit Division for exceeding the non-compliance standards contained in the RAD Review and Referral Procedures. It is anticipated that a 438(b) audit will be considered by the Commission on December 16, 1981.

8304040027

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
United Paper Workers International) RAD 82L-11
Union Political Education Program)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on September 29, 1982, do hereby certify that the Commission decided by a vote of 6-0 to open a Matter Under Review with respect to the above-captioned matter.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision.

Attest:

9-30-82
Date

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

33040400298



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 2, 1982

MEMORANDUM

TO: Charles N. Steele
General Counsel

FROM: B. Allen Clutter *BA*
Staff Director

SUBJECT: Referral of The United Paperworkers International
Union Political Education Program

Attached is a RAD referral of the United Paperworkers International Union Political Education Program. Due to the nature and complexity of the problems, I would like for the Commission to consider auditing the committee pursuant to 2 U.S.C. §437g.

cc: Commission
Robert J. Costa, ASD Audit

Attachment

83040400299



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 30, 1982

MEMORANDUM

TO : CHARLES N. STEELE, GENERAL COUNSEL
 THROUGH : B. ALLEN CLUTTER, STAFF DIRECTOR *AC*
 FROM : JOHN D. GIBSON, ASSISTANT STAFF DIRECTOR-RAD *JG*
 SUBJECT : REFERRAL OF THE UNITED PAPERWORKERS INTERNATIONAL
 UNION POLITICAL EDUCATION PROGRAM

This is a referral of the United Paperworkers International Union Political Education Program ("PEP"). PEP may have commingled voluntary and treasury funds which, according to the Review and Referral Procedures (Chart #22), requires further examination.

A request for Guidance (#81G-7) was also submitted to the Office of General Counsel on September 22, 1981 and updated on November 25, 1981 and June 24, 1982. This request questioned whether partisan communications costs made by PEP to its membership would be considered activity exempt from the definition of expenditure, or whether such payments would be considered activity subject to the limitations of 2 U.S.C. 441a.

If you have any questions regarding this matter, please contact Mike Tangney at 357-0026.

000400300

DATE: July 30, 1982ANALYST: Mike Tangney

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

I. COMMITTEE: United Paperworkers International Union
 Political Education Program ("PEP") C00002394
 Nicholas Vrataric, Treasurer
 702 Church Street P.O. Box 1475
 Nashville, Tennessee 37202

II. RELEVANT STATUTE: 2 U.S.C. 441b(a); 11 C.F.R. 114.2(c),
 11 C.F.R. 114.5(b)

III. BACKGROUND:

Commingling of Treasury and Voluntary Dollars

PEP's 1980 October Quarterly Report disclosed a contribution to the Committee on Political Education, AFL-CIO, which totalled \$25,000. 1/ A Request for Additional Information ("RFAI"), questioning whether this constituted an excessive contribution, was mailed on August 26, 1981 (Attachment 2). A second notice was sent on September 18, 1981 (Attachment 3). In a response dated September 23, 1981, the treasurer stated that the contribution was made through secretarial error from PEP's funds, instead of the union's general fund, and that the \$25,000 would be reimbursed to PEP from the union's general fund (Attachment 4).

A telephone conversation was initiated by the Analyst on October 6, 1981, to inform the treasurer that the transfer of funds described in the letter would violate the Act, since voluntary and non-voluntary dollars would be commingled. The treasurer stated that voluntary and non-voluntary dollars would not be commingled, since the transfer from the union's general account back to PEP would be deposited in their educational/treasury ("non-voluntary") account. In addition, he stated that PEP maintains two bank accounts: a non-voluntary account and a voluntary account. The Analyst requested further written clarification regarding the questioned transfer and the flow of contributions to and from each account (Attachment 5).

1/ The \$25,000 contribution to the AFL-CIO COPE was not reported as being received and appears to have been designated to a non-Federal educational account.

3304040301

REPORTS ANALYSIS REFERRAL
UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL
EDUCATION PROGRAM
PAGE TWO

An additional amendment to the October Quarterly Report, dated October 7, 1981, confirmed the existence of the voluntary and non-voluntary accounts maintained by PEP (Attachment 6). Based upon a review of the amendment, a telephone call was made by the Analyst on October 15, 1981, to inform the treasurer that it would not be necessary to continue reporting the non-voluntary account activity, and that the 1981 Year End Report should not include this activity (Attachment 7).

On November 4, 1981, an RFAI was sent on the amended October Quarterly Report, to obtain more specific information on the usage of the non-voluntary account (Attachment 8). In addition, RFAI's were sent on the 1980 July Quarterly, 30 Day Post-General and amended Year End Reports to request for the proper categorization of receipts (Attachment 9). Responses were not received and therefore a second notice was mailed on November 27, 1981 for all four (4) reports (Attachment 10).

The Analyst initiated a telephone conversation on February 4, 1982, to determine if the RFAI's and the second notice had been received. The treasurer stated that he did not know if the letters had been received, and asked that additional copies be provided (Attachment 11). The additional copies were mailed on February 4, 1982. A notice was also included which requested that, if the amendments could not be supplied within one week, a letter explaining the efforts being made to comply and the approximate date of the responses should be provided (Attachment 12).

The Analyst initiated a telephone call on February 10, 1982, to determine if the copies of the RFAI's had been received. The secretary to the treasurer stated that they had been received and that it was her understanding that the amendments would be filed within a short period of time (Attachment 13).

PEP submitted additional amendments for the 1980 July Quarterly, October Quarterly, 30 Day Post-General and Year End Reports on February 16, 1982 (Attachment 14). Additional clarification as to the usage of the non-voluntary account and voluntary account was provided. The receipt of non-voluntary funds was reported separately on Line 17, and supporting Schedule B for Line 21 was amended to show which disbursements were made from the non-voluntary account and voluntary account.^{2/} However, PEP did

^{2/} Disbursements for non-Federal purposes should actually be reported on Line 27 of FEC Form 3X.

33040302

REPORTS ANALYSIS REFERRAL
UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL
EDUCATION PROGRAM
PAGE THREE

not specifically note on Schedule B for Line 21, Page 2 of the October Quarterly Report, which account was used for contributions to Federal candidates (See Attachment 14, Page 9). Furthermore, PEP did not clarify whether other reports disclosed activity from the two accounts.

Similar problems have continued on the 1981-82 reports filed by PEP. The 1981 Mid-Year Report disclosed a total of \$27,302.81 received during the reporting period, but failed to properly list the receipts on the Detailed Summary Page. As a result of this omission, the source and/or categorization of the receipts could not be ascertained (Attachment 15). In addition, the October Quarterly and Year End Reports disclosed receipts from PEP's non-voluntary account (Attachments 16 and 17, respectively). The Year End Report also disclosed disbursements made from the non-voluntary account, which included a \$500 contribution to the Citizens for David Obey Committee (candidate for U.S. Congress, 7th District of Wisconsin).

The 1982 April Quarterly Report disclosed receipts and disbursements of the non-voluntary account, inadequate categorization of receipts, and a discrepancy between the beginning cash figure of this report and the ending cash figure of the Year End Report (Attachment 18).

On June 30, 1982, RFAI's were sent to PEP regarding these matters (Attachment 19). The RFAI's advised the committee to delete the non-voluntary account from its reports, since it is only necessary to disclose the activity relating to the voluntary account. In addition, the RFAI for the 1981 Year End Report advised PEP to request a full refund from the Citizens for David Obey Committee, because the contribution to that committee appeared to have been made from PEP's non-voluntary account (a prohibited contribution).

On July 9, 1982, a representative of PEP called to seek clarification regarding the RFAI's (Attachment 20). During the conversation, the Analyst was informed that: a) the contribution to the Citizens for Obey Committee was erroneously made from the non-voluntary fund; b) the \$27,302.81 received during the Mid Year reporting period represented individual contributions, none of which aggregated in excess of \$200; and c) the activity regarding the non-voluntary account represented actual transfers of funds. With respect to the latter point, the representative explained that undesignated transfers from local unions are deposited into the non-voluntary account. A transfer to the voluntary account is made if it is subsequently determined that the funds were intended to be

330404030

REPORTS ANALYSIS REFERRAL
UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL
EDUCATION PROGRAM
PAGE FOUR

designated for the voluntary account. In addition, the representative stated that, rather than requesting a refund of \$500 from the Citizens for David Obey Committee, PEP would prefer to transfer \$500 from the voluntary to the non-voluntary account.

The Analyst initiated a follow-up conversation on July 12, 1982, in order to suggest procedures for rectifying the problems (Attachment 21). The Analyst recommended that an escrow account be established for the purpose of depositing undesignated transfers from local unions. This procedure would provide PEP with a ten (10) day period to determine in which account (i.e., voluntary or non-voluntary) the funds should be deposited.^{3/} PEP was also advised that, instead of transferring \$500 from the voluntary to the non-voluntary account, it should seek a refund of the contribution directly from the Citizens for David Obey Committee.

Amendments to the 1981-82 reports were received at the Commission on July 20, 1982 (Attachment 22). As suggested in the RFAI's, the non-voluntary account activity was deleted from PEP's reports.

IV. OTHER PENDING ACTIONS INITIATED BY RAD:

There are no outstanding Requests for Additional Information or matters requiring to be referred at this time.

^{3/} The suggested procedure, which was utilized by the Kennedy for President Committee, was based upon 11 C.F.R. 103.3(b)(1) & (2), which require that a political committee determine the legality of contributions received. Those which cannot be determined to be legal are required to be refunded within a reasonable time.

3304050

83040400303

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (79-80)

DATE 28JUL82
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL EDUCATION PROGRAM CONNECTED ORGANIZATION: PAPERWORKERS INT'L UNION; UNITED				NON-PARTY QUALIFIED		ID #C00002394
1979	APRIL QUARTERLY	8,436	8,474	1JAN79 -31MAR79	5	79FEC/123/1510
	JULY QUARTERLY	22,163	2,500	1APR79 -30JUN79	5	79FEC/131/0003
	OCTOBER QUARTERLY	7,955	4,000	1JUL79 -30SEP79	5	79FEC/137/5673
	YEAR-END	5,739	4,350	1OCT79 -31DEC79	5	80FEC/145/0410
1980	MISCELLANEOUS REPORT			29OCT80 TO FEC	5	80FEC/180/0951
	APRIL QUARTERLY	8,140	6,512	1JAN80 -31MAR80	6	80FEC/155/1967
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN80 -31MAR80	1	81FEC/198/1528
	REQUEST FOR ADDITIONAL INFORMATION			1JAN80 -31MAR80	1	81FEC/197/4001
	JULY QUARTERLY	19,932	3,987	31MAR80 -30JUN80	5	80FEC/160/1627
	JULY QUARTERLY - AMENDMENT	-	-	31MAR80 -30JUN80	6	81FEC/198/1499
	JULY QUARTERLY - AMENDMENT	19,932	3,987	31MAR80 -30JUN80	5	82FEC/224/0044
	REQUEST FOR ADDITIONAL INFORMATION			31MAR80 -30JUN80	4	81FEC/197/2126
	REQUEST FOR ADDITIONAL INFORMATION			31MAR80 -30JUN80	1	81FEC/208/5396
	REQUEST FOR ADDITIONAL INFORMATION 2ND			31MAR80 -30JUN80	1	81FEC/210/1780
	OCTOBER QUARTERLY	16,656	36,174	1JUL80 -30SEP80	8	80FEC/167/5133
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL80 -30SEP80	3	81FEC/206/3774
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL80 -30SEP80	4	81FEC/206/4806
	OCTOBER QUARTERLY - AMENDMENT	16,656	11,174	1JUL80 -30SEP80	10	81FEC/207/1469
	OCTOBER QUARTERLY - AMENDMENT	16,656	36,174	1JUL80 -30SEP80	7	82FEC/224/0029
	REQUEST FOR ADDITIONAL INFORMATION			1JUL80 -30SEP80	3	81FEC/205/0529
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL80 -30SEP80	4	81FEC/206/0688
	REQUEST FOR ADDITIONAL INFORMATION			1JUL80 -30SEP80	2	81FEC/208/5398
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL80 -30SEP80	1	81FEC/210/1778
	PRE-GENERAL	-	3,520	1OCT80 -15OCT80	5	80FEC/180/0791
	POST-GENERAL	3,484	6,469	16OCT80 -24NOV80	7	80FEC/181/3765
	POST-GENERAL - AMENDMENT	3,484	6,469	16OCT80 -24NOV80	5	82FEC/224/0039
	REQUEST FOR ADDITIONAL INFORMATION			16OCT80 -24NOV80	1	81FEC/209/1050
	REQUEST FOR ADDITIONAL INFORMATION 2ND			16OCT80 -24NOV80	1	81FEC/210/1782
	YEAR-END	5,047	6,469	16OCT80 -31DEC80	6	81FEC/189/3261
	YEAR-END - AMENDMENT	1,563	0	25NOV80 -31DEC80	4	81FEC/196/4052
	YEAR-END - AMENDMENT	1,563	0	25NOV80 -31DEC80	3	82FEC/224/0036
	REQUEST FOR ADDITIONAL INFORMATION			16OCT80 -31DEC80	2	81FEC/195/4337
	REQUEST FOR ADDITIONAL INFORMATION 2ND			16OCT80 -31DEC80	3	81FEC/197/0439
	REQUEST FOR ADDITIONAL INFORMATION			25NOV80 -31DEC80	1	81FEC/208/5397
	REQUEST FOR ADDITIONAL INFORMATION 2ND			25NOV80 -31DEC80	5	81FEC/210/1278
TOTAL		94,068	0 75,986	0	140	TOTAL PAGES

All reports have been reviewed

Ending Cash \$29,186
 Debts \$0

Amended
(MAR 82)

3 3 0 4 0 4 0 0 3 0 8

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

DATE 28JUL82
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
UNITED PAPERWORKERS INTERNATIONAL UNION CONNECTED ORGANIZATION: PAPERWORKERS INT'L UNION; UNITED				NON-PARTY QUALIFIED	ID #C00002394	
1981	STATEMENT OF ORGANIZATION - AMENDMENT			15JUL81	2	81FEC/201/1505
	MID-YEAR REPORT	27,302	14,373	1JAN81 -30JUN81	7	81FEC/201/1498
	MID-YEAR REPORT - AMENDMENT	13,773	10,500	1JAN81 -30JUN81	4	82FEC/238/4593
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -30JUN81	2	82FEC/234/2581
	OCTOBER QUARTERLY	31,633	5,050	1JAN81 -30SEP81	6	81FEC/208/4288
	OCTOBER QUARTERLY - AMENDMENT	5,697	1,000	1JUL81 -30SEP81	4	82FEC/238/4589
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -30SEP81	2	82FEC/234/2584
	YEAR-END	7,443	13,811	16OCT81 -31DEC81	6	82FEC/214/0785
	YEAR-END - AMENDMENT	6,016	12,000	1OCT81 -31DEC81	4	82FEC/238/4585
	REQUEST FOR ADDITIONAL INFORMATION			16OCT81 -31DEC81	3	82FEC/234/2587
1982	APRIL QUARTERLY	12,677	4,043	1JAN82 -30MAR82	6	82FEC/229/2903
	APRIL QUARTERLY - AMENDMENT	8,522	1,500	1JAN82 -30MAR82	5	82FEC/238/4580
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -30MAR82	2	82FEC/234/2591
	JULY QUARTERLY	14,049	7,000	1APR82 -30JUN82	6	82FEC/238/4090
	TOTAL	48,057	0 32,000	0	59	TOTAL PAGES

All reports prior to the July Quarterly Report
 have been reviewed
 Ending Cash \$28,507
 Debts \$0

AMENDED
 CHIEF



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

26 August 1981

60432
Attachment 2

Nicholas C. Vrataric, Treasurer
United Paperworkers
International Union Political
Education Program
16303 Horace Harding Expressway
Flushing, NY 11365

1091

Identification No: C00002394

Reference: October Quarterly Report (7/1/80 - 9/30/80)

Q3

Dear Mr. Vrataric:

This letter is prompted by the Commission's preliminary review of your October Quarterly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Schedule B of your report (pertinent portion attached) discloses a contribution which appears to exceed the limits set forth in 2 U.S.C. 441a. The Act precludes a committee from making contributions to another political committee in excess of \$5,000 per calendar year. If you have made an excessive contribution, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$5,000. (Any refund itemized on Schedule A should be reported on Line 16 of the Detailed Summary Page of your next report.)

If you find the contribution in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the excessive contribution, prompt action by you to obtain a refund will be taken into consideration by the Commission. The recipient of the excessive contribution is also being informed of this matter.

88310043024050550279

LAD
9/12
9-3

5-31-81

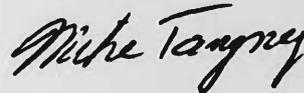
Nicholas C. Vrataric
United Paperworkers
International Union Political
Education Program

2

Attachment 2 (10/22)

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,



Mike Tangney
Reports Analyst
Reports Analysis Division

6 85 10 04 0 24 0 50 0 50 3. 0

Attachment 2 (2003)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

United Paperworkers International Union Political Education Program

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Citizens for Governor Teasdale Comm. P. O. 1025 Jefferson City, MO 65102	Re-election of Governor Teasdale of Missouri Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/8/80	300.00
Hillenbrand for Governor Comm. P. O. Box 1980 Batesville, IN 47006	Election to Governor of Indiana Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/10/80	250.00
UPIU Jackets raffled at our Convention for P.E.P.	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/16/80	420.00
AFL-CIO 815 16th St. N.W. Washington, DC 20006	Purchase of watches raffled at our Convention Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/16/80	147.00
Idaho State Cope Committee 225 North 16th St. Boise, ID 83706	Fight "Right-to-Work" Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/18/80	500.00
UPIU Mailing to our members in Alabama in support of the reelection of Senator Donald Stewart in Alabama L342 C00116541	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/18/80	1,857.30
Committee on Political Education, AFL-CIO 815 Sixteenth St. N.W. Washington, DC 20006 C00003206	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/26/80	25,000.00
Thompson's People 3131 Princeton Pike Lawrenceville, N.J. 08648 C00001693	Re-election of Frank Thompson Congress, 4th District, New Jersey Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	7/15/80	500.00
UPIU Members attending the Democratic Convention in New York City	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	7/31/80	300.00
SUBTOTAL of Disbursements This Page (optional)			29,274.30
TOTAL This Period (last page this line number only)			



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

80

600/22
Attachment 3

September 18, 1981

Nicholas C. Vrataric, Treasurer
United Paperworkers
International Union Political
Education Program
16303 Horace Harding Expressway
Flushing, NY 11365

RUE

Identification No: C00002394

Reference: October Quarterly Report (7/1/80-9/30/80)

Q3

Dear Mr. Vrataric:

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 August 26, 1981. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

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

Sincerely,

John D. Gibson
Acting Assist. Staff Director
Reports Analysis Division

Enclosure

83040400510
81032060688

9/22/81 1923 /mg/25



UNITED PAPERWORKERS INTERNATIONAL UNION

International Headquarters, 702 Church Street, P. O. Box 1475, Nashville, Tennessee 37202
Telephone: 615-254-6666

WAYNE E. GLENN
President

NICHOLAS C. VRATARIC
Secretary-Treasurer

Attachment 4
(PAGE 1)

September 23, 1981

Federal Election Commission
Washington, D. C. 20463

Re: October Quarterly Report
(7/1/80 - 9/30/80)

Gentlemen:

Please be advised that your letter of August 6th addressed to Flushing, New York was just received. Our International office has moved from Flushing, New York to the above address.

The \$25,000 contribution was, through secretarial error, made from our PEP Program instead of the Union's General Fund. We are therefore reimbursing the PEP Program in the said amount to cover such contribution.

We therefore wish to amend our itemized disbursement by making a complete deletion of the said contribution and amending the sub total of disbursements to \$4,274.30.

Very truly,

Nicholas C. Vratarić

Nicholas C. Vratarić
Secretary Treasurer

NCV:fa
opeiu:153

03040400311

PAYEE

CHECK NO

DATE

No. 17268

CHECK AMOUNT

POLITICAL EDUCATION PROGRAM

17268

09/25/81

INVOICE NUMBER	DATE	DESCRIPTION	AMOUNT
	09/24/81	CONTRIBUTIONS	25,000.00
		** TOTAL **	25,000.00

75

DETACH THIS STUB AND RETAIN FOR YOUR RECORDS

UNITED PAPERWORKERS INTERNATIONAL UNION

No. 17268

782 CHURCH STREET

P.O. BOX 1475

MEMPHIS, TENNESSEE 37203

DATE 09/25/81

07-120

241

POLITICAL EDUCATION PROGRAM

PAYEE \$25,000.00

AMOUNT

\$25,000.00



FIRST AMERICAN BANK
MEMPHIS, TENNESSEE

GENERAL FUND

PRESIDENT

TREASURER

⑈ 17268 ⑆ ⑆ 064101291 ⑆

⑈ 900 043 ⑆

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

ATTACHMENT 6
(PAGE 3)

AMENDED REPORT

(Summary Page)

1100710 01:00

<p>1. Name of Committee (in Full) United Paperworkers International Union Political Education Program</p> <hr/> <p>Address (Number and Street) 702 Church Street - P.O. BOX 1475 Nashville TN 11365</p> <hr/> <p>City, State and ZIP Code</p> <hr/> <p><input type="checkbox"/> Check if address is different than previously reported.</p>	<p>4. TYPE OF REPORT (check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input checked="" type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only) <input type="checkbox"/> Monthly Report for _____ <input type="checkbox"/> Twelfth day report preceding _____ <small>(Type of Election)</small> election on _____ in the State of _____ <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____ <input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input type="checkbox"/> NO</p>
<p>2. FEC Identification Number C 0000 2394</p>	
<p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)</p>	

33040400310

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>7/1/80</u> Through <u>9/30/80</u>		
6. (a) Cash on Hand January 1, 19⁸⁰		\$ 36,073.31
(b) Cash on Hand at Beginning of Reporting Period	\$ 53,646.76	
(c) Total Receipts (from Line 18)	\$ 16,656.26	\$ 44,729.07
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 70,303.02	\$ 80,802.38
7. Total Disbursements (from Line 28)	\$ 11,174.30	\$ 21,673.66
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ...	\$ 59,128.72	\$ 58,128.72
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) ... included in line 8	\$ 25,000.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

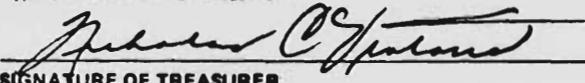
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information, contact:

Nicholas C. Vrataric, Secretary-Treasurer

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Type or Print Name of Treasurer


SIGNATURE OF TREASURER

10/08/80
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

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**AMENDED
DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)**

**ATTACHMENT 6
(PAGE 4)**

Name of Committee (in Full) United Paperworkers International Union Political Education Program	Report Covering the Period: From: 7/1/80 To: 9/30/80	
	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees (Memo Entry Unitemized \$ _____)		
(b) Political Party Committees		
(c) Other Political Committees	16,656.26	44,729.07
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)		
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.)		
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)		
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	-0-	-0-
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	11,174.30	21,673.66
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
22. INDEPENDENT EXPENDITURES (Use Schedule E)		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)		
24. LOAN REPAYMENTS MADE		
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)		
27. OTHER DISBURSEMENTS		
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	11,174.30	21,673.66
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d	16,656.26	44,729.07
30. TOTAL CONTRIBUTION REFUNDS from Line 26d	16,656.26	44,729.07
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)		
32. TOTAL OPERATING EXPENDITURES from Line 19		
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)		

33040400314

SCHEDULE B

**AMENDED
ITEMIZED DISBURSEMENTS**

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

3304040031

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Citizens for Governor Teasdale Comm. P.O. 1025 Jefferson City, MO 65102	Re-election of Governor Teasdale of Missouri Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/8/80	300.00
B. Full Name, Mailing Address and ZIP Code Hillenbrand for Governor Comm. P.O. Box 1980 Batesville, IN 47006	Purpose of Disbursement Election to Governor of Indiana Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/10/80	250.00
C. Full Name, Mailing Address and ZIP Code UPIU Jackets raffled at our Convention for P.E.P.	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/16/80	420.00
D. Full Name, Mailing Address and ZIP Code AFL-CIO 815 16th St. N.W. Washington, DC 20006	Purpose of Disbursement Purchase of watches raffled at our Convention Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/16/80	147.00
E. Full Name, Mailing Address and ZIP Code Idaho State COPE Committee 225 North 16th St. Boise, ID 83706	Purpose of Disbursement Fight "Right-to-Work" Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/18/80	500.00
F. Full Name, Mailing Address and ZIP Code UPIU Mailing to our members in Alabama in support of the re-election of Senator Donald Stewart in Alabama	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/18/80	1,857.30
G. Full Name, Mailing Address and ZIP Code Thompson's People 3131 Princeton Pike Lawrenceville, NJ 08648	Purpose of Disbursement Re-election of Frank Thompson Congress, 4th District, New Jersey Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	7/15/80	500.00
H. Full Name, Mailing Address and ZIP Code UPIU Members attending the Democratic Convention in New York City	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	7/31/81	300.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

SUBTOTAL of Disbursements This Page (optional) 4,274.30

TOTAL This Period (last page this line number only)

SCHEDULE B

**AMENDED
ITEMIZED DISBURSEMENTS**

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)
United Paperworkers International Union Political Education Program

03040400015

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
American Federation of Teachers 11 Dupont Circle, N.W.	Reception for Labor Delegates at the Democratic Convention Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/30/80	\$1,000.00
B. Full Name, Mailing Address and ZIP Code Ravenel Election Committee P.O. 5157 N. Charleston, SC 29406	Purpose of Disbursement Election to Congress South Carolina Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/24/80	500.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			1,500.00
TOTAL This Period (last page this line number only)			11,174.30

UNITED PAPER WORKERS INTERNATIONAL UNION
POLITICAL EDUCATION PROGRAM
163-03 HORACE HARDING EXPRESSWAY
FLUSHING, N. Y. 11365

361

PAY TO THE
ORDER OF

19 1,337.²⁰

DOLLARS

The Amalgamated Bank of New York
118 UNION SQUARE
NEW YORK, N. Y.

⑆000000337⑆ 010000705⑆

EX-A

8 3 0 4 0 4 0 5 1 7

Attachment
(PAGE B)

UNITED PAPER WORKERS INTERNATIONAL UNION
POLITICAL EDUCATION PROGRAM-VOLUNTARY FUND
163-03 BROADWAY, FLOOR 5500
NEW YORK, N.Y. 10013

Pay to the order of

The Developmental Bank of New York

163-03 BROADWAY, FLOOR 5500, NEW YORK, N.Y. 10013

⑆0210⑆0337⑆ 06019801⑆

164

1 3/2/70

10013

EX-B

8 3 0 4 0 4 0 5 1 8

Attachment 6
(Page 9)

PAYEE

POLITICAL EDUCATION PROGRAM

CHECK NO. 17268

DATE 09/25/81

No. 17268
CHECK AMOUNT

INVOICE NUMBER	DATE	DESCRIPTION	AMOUNT
09/24/81		CONTRIBUTIONS 1980	25,000.00
		** TOTAL **	25,000.00

DETACH THIS STUB AND RETAIN FOR YOUR RECORDS

UNITED PAPERWORKERS INTERNATIONAL UNION No. 17268
 702 CHURCH STREET
 P.O. BOX 1476
 NASHVILLE, TENNESSEE 37203
 DATE 09/25/81

PAY TO THE ORDER OF
 POLITICAL EDUCATION PROGRAM
 PAY \$25,000.00

FIRST AMERICAN BANK
 TULLAHOMA, TENNESSEE
 GENERAL FUND

AMOUNT \$25,000.00

09-129
041

PRESIDENT
 THE TREASURER

⑆ 17268 ⑆ ⑆ 064101291⑆

⑆ 900 043 ⑆

EX-9

3 1 9 0 0 4 0 4 0 3 8

Attachment 7

TELECON

ANALYST Mike Tanney
initiated call? Yes

TELECON WITH: Nicholas Vrataric
initiated call? _____

Candidate/Committee: United Paperworkers International Union Political
Education Program

DATE: 10/15/81

SUBJECT(S): Committee letter dated October 7, 1981

I informed Mr Vrataric that based upon a review of their amended report, that it would no longer be necessary to report the activity of the educational/treasury fund on their FEC reports. He agreed that on the 1981 Year End Report that the cash on hand would be reduced to reflect this.

83040400320

Attachment 8
(PAGE 1)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

4 November 1981

Nicholas C. Vratovic, Treasurer
United Paperworkers
International Union Political
Education Program
702 Church Street, P.O. Box 1475
Nashville, TN 37202

Identification No: C00002394

Reference: October Quarterly Amendment (7/1/80 - 9/30/80)

Dear Mr. Vratovic:

This letter is prompted by the Commission's preliminary review of your October Quarterly Amendment. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Your report discloses contributions received on Line 11(d), Column A, of the Detailed Summary Page. However, you have not provided complete figures for Lines 11a, b, and c. Please refer to the instructions on the reporting form for further guidance. Additionally, please provide Schedule A's itemizing these receipts, where appropriate, according to the disclosure requirements of 2 U.S.C. 434(b).

-In response to a Request for Additional Information on your original October Quarterly Report, you noted that the United Paperworkers International Union Political Education Program consisted of two funds (i.e., a non-voluntary account and a voluntary account). Please clarify for the public record whether any of the funds deposited into the non-voluntary account have been used to finance political activity in connection with Federal elections. In addition, please explain if the funds deposited in the non-voluntary account have been disclosed on your reports of receipts and disbursements. If so, please note the report(s) and amount(s) of such activity.

MT

83040400321

Nicholas C. Vratovic
United Paperworkers
International Union Political
Education Program

2

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,



Mike Tangney
Reports Analyst
Reports Analysis Division

83040400311



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

November 27, 1981

Nicholas C. Vrataric, Treasurer
United Paperworkers
International Union
702 Church Street
P.O. Box 1475
Nashville, TN 37202

Identification No: C00002394

Reference: July Quarterly (3/31/80 - 6/30/80), October Quarterly
(7/1/80 - 9/30/80), 30 Day Post-General (10/16/80 -
11/24/80) and Year End Amended (11/25/80 - 12/31/80) Reports

Dear Mr. Vrataric:

This letter is to inform you that as of this date, the Commission has not received your response to our requests for additional information dated November 4, 1981. Those notices requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). Copies of our original requests are enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

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

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

33040400324

10

TELECON

Attachment II

ANALYST Mike Tagney
initiated call? Yes

TELECON WITH: Nicholas Vratovic
initiated call? _____

Candidate/Committee: United Paperworkers International Union Political
Education Program

DATE: February 4, 1982

SUBJECT(S): No response to Requests For Additional Information

I telephoned Mr Vratovic in order to determine if the RFAIs and Second Notice which were sent on November 4, 1981 and November 27, 1981 had been received. His secretary stated that he was in an executive board meeting and would be busy the remainder of the week but that she would discuss this with him and one of them would return the call. Mr. Vratovic returned the call and stated that he did not know if the letters had been received. He asked that additional copies of the RFAIs be sent. Copies were mailed on February 4, 1982.

33040100322

FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

Attachment
12

February 4, 1982

Dear Mr. Vrataric:

Attached are the letters sent to your committee on November 4 and 27, 1981. As the time limit for responding to these matters has passed, amendments should be filed as soon as possible. If, however, you are not able to supply the requested amendments within one week of this notice, a letter explaining your efforts, including an approximate date of response, would be most appreciated.

Should you have any questions, please don't hesitate to contact me at 202-357-0026 or 800-424-9530.

Sincerely,

Michael Tangney
Michael Tangney

83040400326

TELECON

ANALYST Mike Tangney
initiated call? Yes

TELECON WITH: Nicholas Vrataric
initiated call? _____

Candidate/Committee: United Paperworkers International Union Political
Education Program

DATE: 10/6/81

SUBJECT(S): Response to the October Quarterly RFAI

I telephoned Mr. Vrataric to explain that the funds transferred from the union's general fund to the Political Education Program should be reported as a receipt on their Year End Report and informed him that there could be some difficulty since the transfer was made with non-voluntary dollars.*Mr. Vrataric stated that there should not really be any problem since the money transferred from the general fund was made to the educational/treasury fund (Fund A) which is composed of non-voluntary contributions received from local unions out of their general funds. He clarified this by stating that the Political Education Program had two checking accounts with the Amalgamated Bank of New York, the educational/treasury fund (Fund A), and the voluntary fund (Fund B). Fund A is distinguishable from Fund B in that the local unions only forward voluntary contributions to Fund B. I asked Mr Vrataric to again amend the October Quarterly Report by explaining in greater detail the questioned transfer as well as the structure and flow of contributions to the two checking accounts in order to clarify the matter.

*/ The difficulty mentioned referred to commingling treasury and voluntary funds, which is prohibited by the Act.

63040400327



Attachment 6
(PAGE 1)

UNITED PAPERWORKERS INTERNATIONAL UNION

International Headquarters: 702 Church Street, P.O. Box 1475, Nashville, Tennessee 37202
Telephone: 615-254-6666

WAYNE E. GLENN
President

NICHOLAS C. VRATARIC
Secretary-Treasurer

October 7, 1981

CERTIFIED MAIL NO. 854765

Federal Election Commission
1325 K Street
Washington DC 20463

Attention: Mike Tangney
Reports Analyst

Dear Mr. Tangney:

Pursuant to your request, we are submitting herewith an Amended October Quarterly Report (7/1/80 - 9/30/80). The Amendment shows a deletion of the \$25,000.00 contribution issued to COPE as shown on Page 1, Line "G" of the Itemized Disbursements.

As stated previously, the Union Executive Board voted to make a contribution of \$25,000.00 to COPE out of the Union's General Fund for educational purposes. In error, this check was issued on the UPIU Political Education Program from its Educational Account (non-voluntary).

Attached hereto as Exhibit "C", you will find a photocopy of a check on the Union's General Treasury reimbursing the Educational Account for the said \$25,000.00.

The UPIU Political Education Program consists of two funds which are kept in separate bank accounts. All money which is received for educational purposes (non-voluntary) is deposited into our checking account No. 01-000705 as shown on a copy of the check attached hereto as Exhibit "A". The second account, which is No. 01019801 is the Political Education Program Voluntary Fund to which all voluntary money is deposited and disbursed in accordance with the Federal Election laws. Attached also is a photocopy of a check from that account shown as Exhibit "B".

83040100328



0100713 P1:00

Federal Election Commission
Attention: Mike Tangney

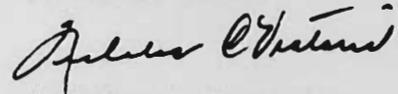
Page 2
October 7, 1981

Any money which we receive which is not clearly spelled out as voluntary money is automatically put into the Educational Account, and the two accounts are not co-mingled.

Please be advised that our Vice President George O'Bea, who is Director of our Political Education Program, has an office in the AFL-CIO Building. His telephone number is (202) 783-5239. If there is any further information you need, you may wish to contact him since he is at a local address.

Hoping this will clarify the matter, I am

Sincerely yours,



Nicholas C. Vrataric
Secretary-Treasurer

NCV/dsa
Enclosures

cc: Vice President O'Bea

33040400329

TELECON

ATTACHMENT 13
ANALYST Mike Tangney
initiated call? Yes

TELECON WITH: UPIUPEP Represenative
initiated call? _____

Candidate/Committee: United Paperworkers International Union Political
Education Program

DATE: February 10, 1982

SUBJECT(S): Receipt of copies of RFAIs

I telephoned Mr. Vrataric to see if he had received the copies of the Requests For Additional Information. His secretary stated that they had arrived but that he was on another line and would return the call. During the afternoon I again telephoned and was informed by the secretary that Mr Vrataric was out of the building and had discussed with her what would be required to amend the reports. She stated that Mr. Vrataric felt that it would not be too difficult to amend the reports and that the amendments would be filed within a short period of time.

03040400330



RECEIVED
ATTACHMENT
14 (PAGE 1)

UNITED PAPERWORKERS INTERNATIONAL UNION

International Headquarters: 702 Church Street, P.O. Box 1475, Nashville, Tennessee 37202
Telephone: 615-254-6666

WAYNE E. GLENN
President

NICHOLAS C. VRATARIC
Secretary-Treasurer

February 10, 1982

CERTIFIED MAIL NO. 854755

Federal Election Commission
1325 K Street
Washington DC 20463

Attention: Mike Tangney, Reports Analyst
Reports Analysis Division

Gentlemen:

Thank you for sending the copies of the November 4th letters as I requested recently by telephone. The Amended Reports are enclosed herewith.

In answer to your letter concerning the July Quarterly Report (3/31/80 to 6/30/80), the Amended Report shows the Voluntary and Non-Voluntary contribution totals separately as requested. No other itemization is required according to my understanding of the directions.

With regard to the October Quarterly Amendment (7/1/80 to 9/30/80), again the receipts have been separated according to the two funds. All funds deposited in both accounts have been deposited and disbursed in accordance with the FEC regulations. Disbursement of all funds has been divided according to Voluntary and Non-Voluntary.

The Amended Reports for the 30-Day Post-General Report (10/16/80 to 11/24/80) and Year End Amendment (11/25/80 to 12/31/80) also have been categorized according to Voluntary and Non-Voluntary receipts.

These Amended Reports should correct the reports as requested.

Yours very truly,
Nicholas C. Vratarić
Nicholas C. Vratarić
Secretary-Treasurer

NCV/dsa
Enclosures

330400331



REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

RECEIVED

(Summary Page)

82 FEB 16 P12: 59

<p>1. Name of Committee (in Full) United Paperworkers International Union</p> <hr/> <p>Address (Number and Street) 702 Church St. - P.O. BOX 1475</p> <hr/> <p>City, State and ZIP Code Nashville TN 37202</p> <p><input type="checkbox"/> Check if address is different than previously reported.</p>	<p>4. TYPE OF REPORT (check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report <input checked="" type="checkbox"/> July 15 Quarterly Report AMENDED <input type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only) <input type="checkbox"/> Monthly Report for _____ <input type="checkbox"/> Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____ <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____ <input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input type="checkbox"/> NO</p>
<p>2. FEC Identification Number C 0000 2394</p>	
<p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)</p>	

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>3/31/80</u> Through <u>6/30/80</u>		
6. (a) Cash on Hand January 1, 19_____		\$ 36,073.31
(b) Cash on Hand at Beginning of Reporting Period	\$ 37,701.05	
(c) Total Receipts (from Line 18)	\$ 19,932.71	\$ 28,072.81
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 57,633.76	\$ 64,146.12
7. Total Disbursements (from Line 28)	\$ 3,987.00	\$ 10,499.36
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 53,646.76	\$ 53,646.76
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Nicholas C. Vrataric, Secretary-Treasurer

Type or Print Name of Treasurer

Nicholas C. Vrataric

2/10/82

SIGNATURE OF TREASURER

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

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FEC FORM 3X (3/80)

35040400333

SCHEDULE B

ITEMIZED DISBURSEMENTS

NON-VOLUNTARY

Page 1 of 2 for
 LINE NUMBER _____
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

AMENDED

ATTACHMENT 19

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL EDUCATION PROGRAM

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Hillenbrand for Indiana Committee P.O. Box 1980 Batesville IN 47006	Elect John Hillenbrand Governor of Indiana Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/21/80	\$ 250.00
B. Full Name, Mailing Address and ZIP Code U.A.W. International Union 1757 North Street, NW Washington DC 20036	New Hampshire Labor for Kennedy Literature Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/22/80	\$ 3,000.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			\$ 3,250.00
TOTAL This Period (last page this line number only)			

VOLUNTARY

AMENDED

Attached
ENCLOS

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL EDUCATION PROGRAM

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bronwal Printing 7333 North Oak Park Avenue Niles IL 60648	Kennedy Four Pint Brochure for our Members in Illinois Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/16/80	\$ 237.00
B. Full Name, Mailing Address and ZIP Code Edgar for Congress Committee 107 Woodlawn Avenue Broomall PA 19008	Re-election of Congressman Edgar, Pennsylvania Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/1/80	\$ 250.00
C. Full Name, Mailing Address and ZIP Code Williams for Congress Committee Box 1980 Helena MT 59601	Re-election of Congressman Pat Williams, Montana Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/6/80	\$ 250.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			\$ 737.00
TOTAL This Period (last page this line number only)			\$ 3,987.00

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

82 FEB 16 P12: 58

(Summary Page)

1. Name of Committee (in Full)
United Paperworkers International Union

Address (Number and Street)
702 Church - P.O. BOX 1475

City, State and ZIP Code
NASHVILLE TN 37202

Check if address is different than previously reported.

2. FEC Identification Number
C 0000 2394

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report AMENDED
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for _____
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

ATTACHMENT H
(PAGE 6)

SUMMARY

5. Covering Period 7/1/80 Through 9/30/80

6. (a) Cash on Hand January 1, 19____

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))

9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

	Column A This Period	Column B Calendar Year-to-Date
		\$ 36,073.31
	\$ 53,646.76	
	\$ 16,656.26	\$ 44,729.07
	\$ 70,303.02	\$ 80,802.38
	\$ 36,174.30	\$ 46,673.66
	\$ 34,128.72	\$ 34,128.72
	\$	
	\$	

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

For further information, contact:

Nicholas C. Vratovic, Secretary-Treasurer

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Type or Print Name of Treasurer

Nicholas C. Vratovic

2/10/82

SIGNATURE OF TREASURER

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

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FEC FORM 3X (3/80)

03040100336

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)**

RECEIVED
Attachment 14 (Page 7)
82 FEB 16 P12: 58

Name of Committee (in Full) United Paperworkers International Union Political Education Program	Report Covering the Period: From: 7/1/80 To: 9/30/80	
	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	8,356.26	
(Memo Entry Unitemized \$ _____)		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)		
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.) <u>Educational</u>	8,300.00	
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)	16,656.26	44,729.07
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES		
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	36,174.30	46,673.66
22. INDEPENDENT EXPENDITURES (Use Schedule E)		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)		
24. LOAN REPAYMENTS MADE		
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)		
27. OTHER DISBURSEMENTS		
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	36,174.30	46,673.66
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d	16,656.26	44,729.07
30. TOTAL CONTRIBUTION REFUNDS from Line 26d		
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)	16,656.26	44,729.07
32. TOTAL OPERATING EXPENDITURES from Line 19		
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)		

6304010037

SCHEDULE B

ITEMIZED DISBURSEMENTS

NON-VOLUNTARY FUND

Attachment 14/2001

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)
UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL EDUCATION PROGRAM

3
3
0
0
4
0
4
0
3
0
0

A. Full Name, Mailing Address and ZIP Code Citizens for Governor Teasdale Comm. P.O. Box 1025 Jefferson City MO 65102	Purpose of Disbursement Re-election of Governor Teasdale of Missouri	Date (month, day, year) 8/8/80	Amount of Each Disbursement This Period 300.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

B. Full Name, Mailing Address and ZIP Code Hillenbrand for Governor Comm. P.O. Box 1980 Batesville IN 47006	Purpose of Disbursement Election to Governor of Indiana	Date (month, day, year) 9/10/80	Amount of Each Disbursement This Period 250.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

C. Full Name, Mailing Address and ZIP Code Charles Kelly 4231 Wayne Road Mantua OH 44255	Purpose of Disbursement UPIU jackets raffled at Convention for P.E.P.	Date (month, day, year) 9/16/80	Amount of Each Disbursement This Period 420.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

D. Full Name, Mailing Address and ZIP Code AFL-CIO 815 16th St. N.W. Washington DC 20006	Purpose of Disbursement Purchase of watches raffled at our Convention	Date (month, day, year) 9/16/80	Amount of Each Disbursement This Period 147.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

E. Full Name, Mailing Address and ZIP Code Idaho State Cope Committee 225 North 16th St. Boise ID 83706	Purpose of Disbursement Fight "Right-to-Work"	Date (month, day, year) 9/18/80	Amount of Each Disbursement This Period 500.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

F. Full Name, Mailing Address and ZIP Code Committee on Political Education AFL-CIO 815 16th St. N.W. Washington DC 20006	Purpose of Disbursement Contribution	Date (month, day, year) 9/26/80	Amount of Each Disbursement This Period 25,000.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

G. Full Name, Mailing Address and ZIP Code American Federation of Teachers 11 Dupont Circle, N.W. Washington DC 20006	Purpose of Disbursement Reception for Labor Delegates at Democratic Convention	Date (month, day, year) 9/30/80	Amount of Each Disbursement This Period 1,000.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

SUBTOTAL of Disbursements This Page (optional)	27,617.00
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TOTAL This Period (last page this line number only)	
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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 2 of 3 for
 LINE NUMBER _____
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

Attachment 14 (Page 9)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)			
United Paperworkers International Union Political Education Program			
A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Cranston for Senate Dinner Committee 2019A Webster St. San Francisco, CA 94115	Re-election of Sen. Alan Cranston, California Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/1/80	600.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Steve Sovern for Congress P. O. Box 529 Marion, IA 52302	Election to Senate, 2nd District, Iowa Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/19/80	400.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Goyke for Congress P. O. Box 1114 Oshkosh, WI 54902	6th Congressional District, Wisconsin Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/19/80	400.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Campaign Committee for Sen. Warren Magnuson P. O. Box 21407 Seattle, WA 98111	Re-election, state of Washington Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/19/80	500.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Birch Bayh for Senator Committee P. O. Box 44491 Indianapolis, IN 46204	Re-election, state of Indiana Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/10/80	1,000.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Durkin for U.S. Senate P. O. Box 1016 Manchester, NH 03105	Re-election, state of New Hampshire Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/10/80	1,000.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Dave Evans for Congress Committee P. O. Box 41709B Indianapolis, IN 46241	Re-election, state of Indiana Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/10/80	500.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Baldus for Congress Committee P. O. Box 41 Menominee, WI 54751	Al Baldus, 3rd Dist. Wisconsin Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/11/80	500.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Wolpe for Congress Committee 246 E. Kilgore Kalamazoo, MI 49001	Re-election, state of Michigan Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/23/80	500.00
SUBTOTAL of Disbursements This Page (optional)			5,400.00
TOTAL This Period (last page this line number only)			

33040100339

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

VOLUNTARY FUND

Attachment #12/18/80

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL EDUCATION PROGRAM

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Thompson's People 3131 Princeton Pike Lawrenceville NJ 08648	Re-election of Frank Thompson Congress, 4th District Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	7/15/80	500.00
B. Full Name, Mailing Address and ZIP Code Thomas Carney, Vice President UPIU Local 620 703 French Street Erie PA 16501	Purpose of Disbursement Democratic Convention in New York City Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	7/31/80	100.00
C. Full Name, Mailing Address and ZIP Code Ron Clarren UPIU Local 1034 212 Washington Sturgis MI 49091	Purpose of Disbursement Democratic Convention in New York City Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	7/31/80	200.00
D. Full Name, Mailing Address and ZIP Code Ravenel Election Committee P.O. Box 5157 N. Charleston SC 29406	Purpose of Disbursement Election to Congress South Carolina Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/24/80	500.00
E. Full Name, Mailing Address and ZIP Code UPIU General Fund Flushing NY 11365	Purpose of Disbursement To reimburse for Alabama membership mailing - Senator Donald Stewart Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/18/80	1,857.30
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements (this Page (optional)			3,157.30
TOTAL This Period (last page this line number only)			36,174.30

33040400340

REPORT OF RECEIPTS AND DISBURSEMENTS
For Political Committee Other Than an Authorized Committee

(Summary Page)

RECEIVED

82 FEB 16 12:58
ATTENDED

1. Name of Committee (in Full)
United Paperworkers International Union
Political Education Program

Address (Number and Street)
702 Church Street
P.O. BOX 1475

City, State and ZIP Code
Nashville, Tennessee 37202

Check if address is different than previously reported.

2. FEC Identification Number

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for _____
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

Thirtieth day report following the General Election on _____ in the State of _____

Termination Report

(b) Is this Report an Amendment?
 YES NO

*ATTACHMENT 14
(PAGE 11)*

83040400311

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>10/16/80</u> Through <u>11/24/80</u>		
6. (a) Cash on Hand January 1, 19 <u>80</u>		\$ 36,073.31
(b) Cash on Hand at Beginning of Reporting Period	\$ 30,608.72	
(c) Total Receipts (from Line 18)	\$ 3,484.04	\$ 48,213.11
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 34,092.76	\$ 84,286.42
7. Total Disbursements (from Line 28)	\$ 6,469.66	\$ 56,663.32
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 27,623.10	\$ 27,623.10
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Nicholas C. Vrataric, Secretary-Treasurer

Type or Print Name of Treasurer

Nicholas C. Vrataric
SIGNATURE OF TREASURER

2/10/82

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

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FEC FORM 3X (3/80)

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)**

RECEIVED
Attachment IV
AMENDED
92 FEB 16 12:58 12/

Name of Committee (in Full)
UNITED PAPERWORKERS INTERNATIONAL UNION
POLITICAL EDUCATION PROGRAM

Report Covering the Period:
From: **10/16** To: **11/24/80**

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	2,264.04	
(Memo Entry Unitarized \$ _____)		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)		
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.) (EDUCATIONAL)	1,220.00	
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)	3,484.04	48,213.11
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES		
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	6,469.66	56,663.32
22. INDEPENDENT EXPENDITURES (Use Schedule E)		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)		
24. LOAN REPAYMENTS MADE		
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)		
27. OTHER DISBURSEMENTS		
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	6,469.66	56,663.32
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d		48,213.11
30. TOTAL CONTRIBUTION REFUNDS from Line 26d		
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)		48,213.11
32. TOTAL OPERATING EXPENDITURES from Line 19		
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)		

83040400342

SCHEDULE B

ITEMIZED DISBURSEMENTS

VOLUNTARY

Attachment (Page 10)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

United Paperworkers International Union Political Education Program

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Wolpe for Congress Committee 246 E. Kilgore Kalamazoo, MI 49001	Re-election efforts Michigan	10/17/80	\$420.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Wolpe for Congress Committee 246 E. Kilgore Kalamazoo, MI 49001	Re-election efforts Michigan	10/24/80	330.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Claude Leach Campaign P. O. Box 129 DeRidder, LA 70634	Re-election to Congress Louisiana	10/24/80	500.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Democratic National Committee	Contribution	10/16/80	1,000.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Charles Schumer for Congress Com. 2946 Avenue X Brooklyn, NY 11235	Brooklyn, New York	10/29/80	500.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Committee to Elect Polly Baca Barragan to Congress 161 W. 84th Ave. Thornton, CO 80229	Colorado	10/28/80	500.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Citizens for Dave Obey Committee P. O. Box 1322 Wausau, WI 54401	Wisconsin	10/29/80	500.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Sen. John Glenn Camp. Committee P.O. Box 1824 Washington, DC 20013	Washington, DC	10/29/80	1,000.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Luken for Congress Committee c/o H. Margetich, Marina Towers 501 Slaters Lane Alexandria, VA 22314	Ohio	10/31/80	500.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

SUBTOTAL of Disbursements This Page (optional) 5,250.00

TOTAL This Period (last page this line number only)

0004010031

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 2 of 2 for
 LINE NUMBER _____
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

NON-VOLUNTARY

Attachment 1/1/80

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

United Paperworkers International Union Political Education Program

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Ohio Democratic Party-Supreme Court Campaign 2312 Kroger Bldg. Cincinnati, OH 45202	Re-election of F.Celebrezze C. Brown & L. Grey Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/16/80	\$ 300.00
B. Full Name, Mailing Address and ZIP Code Committee to Elect Ciro Delle Donne 813 Scott St.N. Wilmington, DE 19805	Purpose of Disbursement State Representative Delaware Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/16/80	100.00
C. Full Name, Mailing Address and ZIP Code Saxon Paper	Purpose of Disbursement Purchase of paper for P.E.P. leaflets Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/17/80	119.66
D. Full Name, Mailing Address and ZIP Code Committee to Reelect Rudy Chmura 71 Chauncey Dr. Springfield, MA 01129	Purpose of Disbursement State Representative Massachusetts Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/24/80	200.00
E. Full Name, Mailing Address and ZIP Code Citizens for Gallen Committee P. O. Box 1495 Concord, NH 03301	Purpose of Disbursement Governor, New Hampshire Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/29/80	500.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			1,219.66
TOTAL This Period (last page this line number only)			6,469.66

3304010031

REPORT OF RECEIPTS AND DISBURSEMENTS
For Political Committee Other Than an Authorized Committee

RECEIVED

(Summary Page)

02 FEB 16 12:58

1. Name of Committee (in Full)
United Paperworkers International Union

Address (Number and Street)
702 Church - P.O. BOX 1475

City, State and ZIP Code
Nashville TN 37202

Check if address is different than previously reported.

2. FEC Identification Number
C 0000 2394

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report

July 15 Quarterly Report

October 15 Quarterly Report

January 31 Year End Report AMENDED

July 31 Mid Year Report (Non-election Year Only)

Monthly Report for _____

Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

Thirtieth day report following the General Election on _____ in the State of _____

Termination Report

(b) Is this Report an Amendment?
 YES NO

**ATTACHMENT M
(PAGE 15)**

33040100348

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	11/25/80 Through 12/31/80		
6. (a) Cash on Hand January 1, 19__		\$ 36,073.31
(b) Cash on Hand at Beginning of Reporting Period	\$ 27,623.10	
(c) Total Receipts (from Line 18)	\$ 1,563.10	\$ 49,776.21
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 29,186.20	\$ 85,849.52
7. Total Disbursements (from Line 28)	\$ -0-	\$ 56,663.32
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 29,186.20	\$ 29,186.20
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Nicholas C. Vratovic, Secretary-Treasurer
Type or Print Name of Treasurer

Nicholas C. Vratovic
SIGNATURE OF TREASURER

2/10/82
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

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FEC FORM 3X (3/80)



UNITED PAPERWORKERS INTERNATIONAL UNION

POLITICAL EDUCATION PROGRAM

RECEIVED

21 JUL 21 12:10

International Headquarters: 163-03 Horace Harding Expressway, Flushing, New York 11365
Telephone: 212-762-6000

WAYNE E. GLENN
President

GEORGE H. O'BEA, JR.
Vice President - PEP Director

NICHOLAS C. VRATARIC
Secretary-Treasurer

*Attachment 15
(PAGE 1)*

July 15, 1981

Federal Election Commission
1325 K Street
Washington, DC 20463

Dear Sirs:

Enclosed please find our July 31 Mid Year Report for the period of January 1, 1981 through June 30, 1981.

Very truly,

Nicholas C. Vrataric,
Secretary-Treasurer

NCV:sg
opeiu:153
afl-cio
Enc.

cc: Secretary of the Senate
119 D Street N.E.
Washington, DC 20002

Office of the Secretary of State
State Office Building
Augusta, ME 04333

Clerk of the House
1036 Longworth Building
Washington, DC 20515

Office of the Secretary of State
180 State Office Building
St. Paul, MN 55155

Office of the Secretary of State
P.O. Box 1467
Sacramento, CA 95807

Office of the Secretary of State
Box 12887
Austin, TX 78711

Office of the Secretary of State
State House, Rm 205
Boise, ID 83720

State Board of Elections
101 Ninth St. Office Bldg.
Richmond, VA 23219

Office of the Secretary of State
State House, Rm. 201
Indianapolis, IN 46204

State Elections Board
125 S. Webster St.
Madison, WI 53702

3 300 400 4:00 1314570 3



REPORT OF RECEIPTS AND DISBURSEMENTS
 For a Political Committee Other Than an Authorized Committee
 (Summary Page)

RECEIVED
 81 JUL 21 P12:10
 Attached 15/2/81

1. Name of Committee (in Full)
**United Paperworkers International Union
 Political Education Program**

Address (Number and Street)
**163-03 Horace Harding Expressway
 Flushing, NY 11365**

City, State and ZIP Code

Check if address is different than previously reported.

2. FEC Identification Number
C 0000 2394

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only) **7-1-81**
 Monthly Report for _____
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>1/1/81</u> Through <u>6/30/81</u>		
6. (a) Cash on Hand January 1, 1981			\$ 29,186.20
(b) Cash on Hand at Beginning of Reporting Period		\$ 29,186.20	
(c) Total Receipts (from Line 18)		\$ 27,302.81	\$ 27,302.81
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)		\$ 56,489.01	\$ 56,489.01
7. Total Disbursements (from Line 28)		\$ 14,373.04	\$ 14,373.04
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))		\$ 42,115.97	\$ 42,115.97
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$	

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

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

Nicholas C. Vrataric, Sec.-Treas.
 Type or Print Name of Treasurer

Nicholas C. Vrataric
 SIGNATURE OF TREASURER

7/15/81
 Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

<i>[Handwritten]</i>							
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FEC FORM 3X (3/80)
revised mt

0 6 0 4 0 1 0 0 3 4 9 8

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)**

Attachment 15 (Page 3)

Name of Committee (in Full)
**United Paperworkers International Union Political
Education Program**

Report Covering the Period:
From: **1/1/81** To: **6/30/81**

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		0
(Memo Entry Unitemized \$ _____)		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)	27,302.81	27,302.81
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.)		
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)	27,302.81	27,302.81
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	542.50	542.50
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	12,830.54	12,830.54
22. INDEPENDENT EXPENDITURES (Use Schedule E)		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)		
24. LOAN REPAYMENTS MADE		
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)		
27. OTHER DISBURSEMENTS	1,000.00	1,000.00
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	14,373.04	14,373.04
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d	27,302.81	27,302.81
30. TOTAL CONTRIBUTION REFUNDS from Line 26d		
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)	27,302.81	27,302.81
32. TOTAL OPERATING EXPENDITURES from Line 19		
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)		

3 3801 403 1000131499

Attachment 15 (Page 4)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

United Paperworkers International Union Political Education Program

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Charles Kelly 4231 Wayne Rd. Mantua, OH 44255	Purchase of UPIU Jackets for raffling Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/12/81	542.50
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)	542.50
TOTAL This Period (last page this line number only)	

3 38014003420001315500 C

SCHEDULE B

ITEMIZED DISBURSEMENTS

Attachment 15 (PAGE 5)

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Name of Committee (in Full)

United Paperworkers International Union Political Education Program

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0110
35
34K
42

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Wenstrom Volunteer Committee Box 1077 Elbow Lake, MN 56531	aid in repaying campaign debts, 7th Dis., Minn. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2/6/81	500.00
B. Full Name, Mailing Address and ZIP Code Birch Bayh for Senator Committee P. O. Box 44491 Indianapolis, IN 46204	aid in repaying campaign debts, state of Indiana Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2/12/81	1,000.00
C. Full Name, Mailing Address and ZIP Code Dave Evans for Congress P. O. Box 41709B Indianapolis Int'l Airport Indianapolis, IN 46241	aid in repaying campaign debts, State of Indiana Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/30/81	500.00
D. Full Name, Mailing Address and ZIP Code Phillip Burton Campaign Committee P. O. Box 4200 San Francisco, CA 94101	Congressman, 6th District state of California Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/21/81	500.00
E. Full Name, Mailing Address and ZIP Code Goyke for Congress Committee Box 1114 Oshkosh, WI 54902	aid in repaying campaign debts, 6th Dis, Wisconsin Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/27/81	500.00
F. Full Name, Mailing Address and ZIP Code Senate Democratic Leadership Circle 444 North Capitol Street Washington, DC 20001	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/4/81	7,500.00
G. Full Name, Mailing Address and ZIP Code United Labor Legislative Committee P. O. Box 12727 Austin, TX 78711	aid ULLC in current legislative session Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2/2/81	500.00
H. Full Name, Mailing Address and ZIP Code Concerned Seniors for Better Gvmt. 1346 Connecticut Ave, N.W. Room 1213 Washington, DC 20036	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2/12/81	1,000.00
I. Full Name, Mailing Address and ZIP Code Sheraton-Carlton Hotel 923 16th St. N.W. Washington, DC	Luncheon for Sen. George Mitchell, Maine Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/12/81	830.54

SUBTOTAL of Disbursements This Page (optional) 12,830.54

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Attachment 15 (page 6)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

United Paperworkers International Union Political Education Program

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Lechner for Lt. Governor 1000 Potomac St, Suite 204 Washington, DC 20007	State of Virginia Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/2/81	500.00
B. Full Name, Mailing Address and ZIP Code Idaho State AFL-CIO Right-to-Work Defense Fund 225 North 16th St. Boise, ID 83706	Purpose of Disbursement aid in fighting Right-to-Work bill Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2/2/81	500.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			1,000.00
TOTAL This Period (last page this line number only)			14,373.04

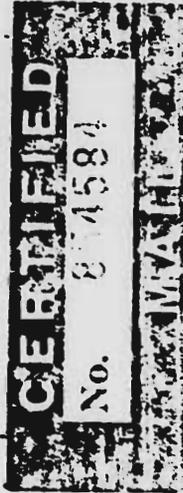
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UNITED PAPERWORKERS INTERNATIONAL UNION
 POLITICAL EDUCATION PROGRAM

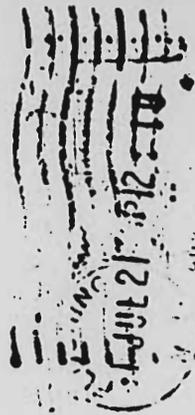
163-03 Horace Harding Expressway, Flushing, New York 11365

P E P



Federal Election Commission
 1325 K Street
 Washington, DC 20463

CERTIFIED MAIL
 (Return Receipt Requested)



ATTACHMENT 15
 (PAGE 7)

1-112 Attachment 16 (PAGE 2)

10-29-81

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)
United Paperworkers International Union
Political Education Program

Address (Number and Street)
702 Church Street - P.O. Box 1475

City, State and ZIP Code
Nashville, Tennessee 37202

Check if address is different than previously reported.

2. FEC Identification Number
C 0000 2394

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

- (a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report **Q3**
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for _____
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>1/1/81</u> Through <u>9/30/81</u>		
6. (a) Cash on Hand January 1, 19 <u>81</u>		\$ 29,186.20
(b) Cash on Hand at Beginning of Reporting Period	\$ 42,115.97	
(c) Total Receipts (from Line 18)	\$ 31,633.43	\$ 58,936.24
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 73,749.40	\$ 88,122.44
7. Total Disbursements (from Line 28)	\$ 5,050.00	\$ 19,423.04
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 68,699.40	\$ 68,699.40
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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

For further information, contact:

Nicholas C. Vrataric, Secretary-Treasurer
Type or Print Name of Treasurer

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Nicholas C. Vrataric
SIGNATURE OF TREASURER

10-15-81
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

11/1/81	11/1/81	11/1/81	11/1/81	11/1/81	11/1/81	11/1/81	11/1/81	11/1/81	11/1/81
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FEC FORM 3X (3/80)

831004302708045289

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Attachment 16 (PAGE 3)

DATE: 8/11/81 TIME: 5:57

Name of Committee (in Full)
**United Paperworkers International Union Political
Education Program**

Report Covering the Period:
From: **6/30/81** To: **9/30/81**

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unitemized \$ _____)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

**16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES
AND OTHER POLITICAL COMMITTEES**

17. OTHER RECEIPTS (Dividends, Interest, etc.) Educational

18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17).

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

**21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND
OTHER POLITICAL COMMITTEES**

22. INDEPENDENT EXPENDITURES (Use Schedule E)

**23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES
(2 U.S.C. §441a(d)) (Use Schedule F)**

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)

27. OTHER DISBURSEMENTS

28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27).

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d

30. TOTAL CONTRIBUTION REFUNDS from Line 26d

31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
	5,697.43	5,697.43
	5,697.43	5,697.43
	25,936.00	25,936.00
	31,633.43	31,633.43
	1,000.00	1,000.00
	4,050.00	4,050.00
	5,050.00	5,050.00
	31,633.43	31,633.43
	31,633.43	31,633.43

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22 c.o.

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for
 LINE NUMBER 21
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

ATTACHMENT 16 (PAGE 4)

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Name of Committee (in Full)

United Paperworkers International Union Political Education Program

21

831043024080432971

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
"Riegle for Senate in '82" c/o Glenn B. Goss, Director - Region IX 5610 Crawfordsville Road- Suite 2302 Indianapolis, IN 46224	Riegle Senate Campaign Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/31/81	1,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement <i>CO0089920</i> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) 1,000.00

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Attachment 14 (PAGE 5)

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Name of Committee (in Full)

United Paperworkers International Union Political Education Program

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Mark A. Scott, President UPIU Local No. 1736 525 Gounory Street North Tonawanda, NY 14120	Campaign for 20th District Niagra County Legis. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	7/14/81	500.00
Gary Moon, UPIU Local No. 1161 Route 1, Box 268 Rogersville, AL 35652	Campaign for Alabama House District 1 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	7/14/81	500.00
Phillip Keller, President Local 1237 93 Roe Avenue Newark, OH	Campaign for City Council Newark, Ohio Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/25/81	200.00
Marshall A. Smith, Vice President Benjamin Fox Pavilion - Suite 426 Jenkintown, PA 19046	Delaware County AFL-CIO COPE Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/28/81	300.00
Marshall A. Smith, Vice President Benjamin Fox Pavilion - Suite 426 Jenkintown, PA 19046	Louis M. Wade for State Representative Committee Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/28/81	300.00
Davidson County Democratic Women Fund Raiser Nashville, Tennessee	Democratic Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/11/81	150.00
Mr. James Hawkins P.O. Box 193 Wadsworth, OH 44281	Democratic Campaign Fund Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/22/81	100.00
Christopher J. Jackman, Director Region II - 7800 River Road North Bergen, NJ 07047	Race for Speaker of House in New Jersey Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15/81	1,000.00
Democratic Legislative Campaign Committee 226 West State Street Trenton, New Jersey	Governor's Campaign in New Jersey Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15/81	1,000.00
SUBTOTAL of Disbursements This Page (optional)			4,050.00
TOTAL This Period (last page this line number only)			5,050.00

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17

Attachment 14
(PAGE 4)

 <p>FROM _____ UNITED PAPERWORKERS INTERNATIONAL UNION AFL CIO CLC 702 CHURCH STREET P.O. BOX 1475 NASHVILLE, TENNESSEE 37202</p>
<p>To Attn: <u>Mike Tangney</u>, Reports Analyst FEDERAL ELECTION COMMISSION 1325 K Street WASHINGTON DC 20463</p>
FIRST CLASS MAIL

Return Receipt Requested

CERTIFIED
 No. 854766
MAIL

RECEIVED

UNITED PAPERWORKERS INTERNATIONAL UNION 32



POLITICAL EDUCATION PROGRAM

Attachment 17 (PAGE 1)

International Headquarters: 702 Church Street, Nashville, TN 37202

Telephone: (615) 254-6666

PEP

WAYNE E. GLENN
President

GEORGE H. O'NEA, JR.
Vice President - PEP Director

NICHOLAS C. VRATARIC
Secretary-Treasurer

January 22, 1982

CERTIFIED MAIL NO. 854742

Federal Election Commission
1325 K Street
Washington DC 20463

Dear Sirs:

Enclosed please find our October 15, 1981 Quarterly Report for the period October 16, 1981 through December 31, 1981.

Yours truly,

Nicholas C. Vrataric
Secretary-Treasurer

NCV/dsa
Enclosure

cc: Secretary of the Senate
119 D Street N.E.
Washington, DC 20003

State Elections Board
125 South Webster Street
Madison WI 53702

Clerk of the House
1036 Longworth Building
Washington, DC 20515

Division of Public Records
Office of the Secretary of State
1701-1703 McCormack Bldg.
One Ashburton Place
Boston MA 02108

Office of the Secretary of State
904 Capitol Hill Building
Nashville TN 37219

State Administrative Board
of Election Laws
P.O. Box 231
Annapolis MD 21404

State Board of Elections
101 Ninth Street Office Bldg.
Richmond VA 23219

88 33 00 34 20 14 10 08 73 88 33

Survival
MT



SCHEDULE B

ITEMIZED DISBURSEMENTS

VOLUNTARY FUND

Attachment 17 (PAGE 5)

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Name of Committee (in Full)

UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL EDUCATION PROGRAM

83040410799
 33032140799

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Metzenbaum for Senate 406 New Jersey Avenue, SE Washington DC 20003	Re-election to Senate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/17/81 <i>C00114700</i>	1,000.00 <i>1,000.00</i>
Committee to Re-elect Senator P.O. Box 1400 Kennedy Boston MA 02205	Re-election to Senate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/18/81 <i>C00140202</i>	1,000.00 <i>1,000.00</i>
Committee to Re-elect Senator P.O. Box 1400 Kennedy Boston MA 02205	Re-election to Senate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/25/81 <i>C00140202</i>	4,000.00 <i>4,000.00</i>
Friends of Jim Sasser 116 South 12th Street Nashville TN 37206	Senate Campaign Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/25/81 <i>C00055436</i>	5,000.00 <i>5,000.00</i>
Citizens for Sarbanes P.O. Box 10644 Baltimore, Maryland	Senate Campaign Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/25/81 <i>C00021111</i>	1,000.00 <i>1,000.00</i>
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			12,000.00
TOTAL This Period (last page this line number only)			13,811.47

ATTACHMENT 17
(PAGE 6)

8 2 0 3 2 1 4 0 7 9 0

Return Receipt Requested

CERTIFIED
No. 854742
MAIL



FROM
UNITED PAPERWORKERS INTERNATIONAL UNION
AFL CIO CLC
702 CHURCH STREET
P.O. BOX 1475
NASHVILLE, TENNESSEE 37202

To

Federal Election Commission
1325 K Street
Washington DC 20463

FIRST CLASS MAIL



2 9 9 0 0 4 0 4 0 3 8

02 JAN 26 P 1:32

RECEIVED

RECEIVED

02 APR 21 11:22



UNITED PAPERWORKERS INTERNATIONAL UNION

International Headquarters: 702 Church Street, P.O. Box 1475, Nashville, Tennessee 37202
Telephone: 615-254-6666

WAYNE E. GLENN
President

NICHOLAS C. VRATARIC
Secretary-Treasurer

ATTACHMENT 18

April 15, 1982

(PAGE 1)

CERTIFIED MAIL NO. 854595

Federal Election Commission
1325 K Street
Washington DC 20463

Dear Sirs:

Enclosed please find our April 15, 1982 Quarterly Report for the period January 1, 1982 through March 30, 1982.

Yours truly,

Nicholas C. Vratarić
Secretary-Treasurer

NCV/dsa
Enclosure

cc: Secretary of the Senate
119 D Street N.E.
Washington DC 20003

Office of the Secretary of State
State House Room 201
Indianapolis IN 46204

Clerk of the House
1036 Longworth Building
Washington DC 20515

Office of the Secretary of State
Election Division
State Office Building
Augusta ME 04333

Office of the Secretary of State
904 Capitol Hill Building
Nashville TN 37219

Commission of Campaign
Finances and Practices
Capitol Station
Helena MT 59601

State Elections Board
125 South Webster Street
Madison WI 53702

Bureau of Elections
North Office Building, Room 305
Harrisburg PA 17120

38 32 00 43 02 42 00 02 39 50 63



SCHEDULE B

ITEMIZED DISBURSEMENTS

VOLUNTARY FUND

Attachment 18/PAGE 4

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL EDUCATION PROGRAM

08-02-00 43 02 12 09 02 59 0.6

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Citizens for David Obey Committee P.O. Box 1322 Wausau WI 54401	House; 7th District; Wisconsin Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	COO0 3/2/82	17830 \$500.00
Kostmayer for Congress P.O. Box 1982 Solebury PA 18963	House; 8th District; Pennsylvania Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	COO0 3/2/82	37754 \$500.00
Melcher for Senate Committee Box 1154 Helena MT 59624	Senate Campaign Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	COO0 3/29/82	44372 \$500.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			\$1500.00
TOTAL This Period (last page this line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

NON-VOLUNTARY FUND

Attachment 18/PAGE 5

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL EDUCATION PROGRAM

38 32 00 43 02 12 00 02 30 7 17

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Kelly Press, Inc. 5788 Second St. NE Washington DC 20011	5,000 PEP Certificates for Local Union Contrib. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	1/11/82	\$593.80
Erwin W. Barton Chili & Hot Dog Supper P.O. Box 99 Pasadena TX 77501	Texas House of Representatives Campaign Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	1/11/82	\$100.00
Friends of Fulton P.O. Box 2544 Nashville TN 37219	Reception tickets for 1/21/82 (Mayor & Mrs. Fulton) Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	1/11/82	\$750.00
Stephen North for District Attorney P.O. Box 2509 Nashville TN 37219	Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/25/82	\$500.00
Citizens for Brennan P.O. Box 1982 Augusta ME 04330	Campaign for Governor Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/25/82	\$500.00
Harry E. Vangorden, Treasurer RR # 1 - Box 184 Flat Rock IN 47234	John Myers for County Council; 2nd District Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/30/82	\$100.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			\$2543.80
TOTAL This Period (last page this line number only)			\$4043.80

Attachment 18
(PAGE 0)

8 2 0 3 2 2 9 2 9 0 8

Return Receipt Requested.

CERTIFIED MAIL
No. 854595



FROM
UNITED PAPERWORKERS INTERNATIONAL UNION
AFL CIO CLC
702 CHURCH STREET
P. O. BOX 1475
NASHVILLE, TENNESSEE 37202

TO FEDERAL ELECTION COMMISSION

1325 K STREET

WASHINGTON DC 20463

FIRST CLASS MAIL



1 2 0 0 0 4 0 4 0 0 8

Attachment 19
(PAGE 1)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

30 June 1982

Nicholas C. Vrataric, Treasurer
United Paperworkers International Union
Political Education Program
702 Church Street, P.O. Box 1475
Nashville, TN 37202

Identification Number: C0002394

Reference: Mid-Year Report (1/1/81 - 6/30/81) MY

Dear Mr. Vrataric:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

-Please provide the total for Line 11a, Columns A and B of the Detailed Summary Page. (2 U.S.C. 434(b))

-You have previously noted that the United Paperworkers International Union Political Education Program consisted of two funds (i.e. a non-voluntary account and a voluntary account). Your report discloses \$27,302 in total receipts on Line 18. Please clarify if any of these receipts represent funds from the non-voluntary account. If so, please amend your report by deleting the educational/non-voluntary account activity, since only the receipts and disbursements of your separate segregated fund need be disclosed.

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11/2 7/2/82

-Your report disclosed contributions both to Federal and non-Federal candidates/committees on a Schedule B for Line 21. For future filings you should note that contributions to non-Federal candidates/committees which exceed \$200 in the aggregate should be itemized on a separate Schedule B for Line 27. (2 U.S.C. 434(b)(6)(B)(v))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,



Mike Tangney
Reports Analyst
Reports Analysis Division

820492492532

Attachment 19
(PAGE 3)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

30 June 1982

Nicholas C. Vrataric, Treasurer
United Paperworkers International Union
Political Education Program
702 Church Street, P.O. Box 1475
Nashville, TN 37202

Identification Number: C00002394

Reference: October Quarterly Report (1/1/81 - 9/30/81)

Dear Mr. Vrataric:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

-You have previously noted that the United Paperworkers International Union Political Education Program consisted of two accounts (i.e. a non-voluntary account and a voluntary account). Your report discloses \$25,936 in receipts on Line 17 of the Detailed Summary Page from the Educational Fund, which is a non-voluntary account. Please amend your report by deleting the educational/non-voluntary account activity, since only the receipts and disbursements of your separate segregated fund need be disclosed.

-The coverage dates of this report overlap with your previous report. Please be advised that the coverage dates for this report should begin immediately after the ending coverage date of your last report.

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WJO
7/1/82
7-6

ATTACHMENT 19
(PAGE 4)

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mike Tangney

Mike Tangney
Reports Analyst
Reports Analysis Division

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

Attachment 19
(PAGE 5)



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

30 June 1982

Nicholas C. Vrataric, Treasurer
United Paperworkers International Union
Political Education Program
702 Church Street, P.O. Box 1475
Nashville, TN 37202

Identification Number: C00002394

Reference: Year-End Report (10/16/81 - 12/31/81)

Dear Mr. Vrataric:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

8283239237

-Schedule B of your report discloses a contribution(s) made from a non-voluntary fund of your committee. You are advised that contributions from labor organizations are prohibited by the Act, unless made from a separate segregated fund established by the labor organization. (2 U.S.C. 441b(a)) If you have made a prohibited contribution, the Commission recommends that you notify the recipient and request a full refund. Please inform the Commission, in writing, of the refund and provide a photocopy of your refund request sent to the recipient. In addition, any refund of funds prohibited by the Act should not be deposited into the account of your separate segregated fund, nor should such activity be disclosed on your reports of receipts and disbursements.

If you find the contribution(s) in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal or audit steps concerning the prohibited contribution(s), prompt action by you to recover the amount will be taken into consideration by the Commission.

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been

WV
7/2/82 FC 2-6

provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

-You have previously noted that the United Paperworkers International Union Political Education Program consisted of two accounts (i.e. a non-voluntary account and voluntary account). Your report lists \$1,327 in receipts on Line 17 of the Detailed Summary Page from the Educational Fund, which is a non-voluntary account. In addition, Schedule B discloses \$1,811.47 in disbursements made from the Educational Fund. Please amend your report by deleting the educational/non-voluntary account activity, since only receipts and disbursements of your separate segregated fund need be disclosed.

-Please be advised that the coverage dates for this report should begin immediately after the ending coverage date of your last report.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,



Mike Tangney
Reports Analyst
Reports Analysis Division

82842392338



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

ATTACHMENT 19
(PAGE 8)

30 June 1982

Nicholas C. Vrataric, Treasurer
United Paperworkers International
Political Education Program
702 Church Street, P.O. Box 1475
Nashville, TN 37202

Identification Number: C00002394

Reference: April 15 Quarterly Report (1/1/82 - 3/30/82) 91

Dear Mr. Vrataric:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The beginning cash balance of this report should equal the ending balance of your Year-End report. Please clarify this discrepancy and amend any subsequent report(s) which may be affected by this correction.

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 C.F.R. 104.3(a)(2))

-You have previously noted that the United Paperworkers International Union Political Education Program consisted of two accounts (i.e., a non-voluntary account and a voluntary account). Your report discloses \$4,842.35 in receipts on Line 17 of the Detailed Summary Page from the Educational Fund, which is a non-voluntary account. In addition, Schedule B discloses \$2,543.80 in disbursements made from the non-voluntary fund. Please amend your report by deleting the educational/non-voluntary account activity, since only the receipts and disbursements of your separate segregated fund need be disclosed.

628439231

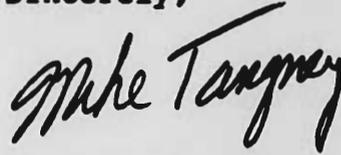
WP
7/1/82
K 7-6

ATTACHMENT 19
(PAGE 9)

-Please provide the Column B totals for the Detailed Summary Page. (2 U.S.C. 434(b))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,



Mike Tangney
Reports Analyst
Reports Analysis Division

832040243902382

TELECON

ANALYST Mike Tangney

TELECON WITH: Donna Alexander

Candidate/Committee: United Paperworkers International Union Political Education Program ("PEP")

DATE: 7/9/82

SUBJECT(S): Requests For Additional Information dated 6/30/82

Donna Alexander telephoned to seek clarification regarding the Requests For Additional Information sent to the committee for the Mid Year, October Quarterly, Year End and 1982 April Quarterly Report. Since PEP did not disclose a sum on the memo entry for Line 11(a) or provide Schedule A for their reports, I informed her of the necessity of amending their reports by providing the sum of unitimized contributions, since she stated that they had not received any contributions from individuals aggregating in excess of \$200. On the Mid Year Report totals were not provided for Line 11(a), Column A and B of the Detailed Summary Page. I explained their reports should be amended to reflect these figures. For the Year End Report she stated that the \$500 contribution to the Citizens For David Obey was made through error from the non-voluntary educational fund. As an alternative to requesting a refund of the contribution, she suggested that \$500 be transferred from the voluntary fund to the non-voluntary educational fund. For the April Quarterly Report, a discrepancy was found between the beginning cash on hand and the ending cash on hand of the Year End Report. Ms. Alexander stated that this was the result of the PEPs accounting system for depositing transfers from local unions. When it is not possible to determine the account for which the transfer from the local unions was designated, the funds are deposited into the non-voluntary educational fund. If a determination is made that the funds are to be designated to the voluntary account, they are then transferred from the non-voluntary educational fund.

8304010031

TELECON

ANALYST Mike Tangney

TELECON WITH: Nicholas Vrataric, Treasurer and Donna Alexander

Candidate/Committee: United Paperworkers International Union Political Education Program ("PEP")

DATE: 7/12/82

SUBJECT(S): Follow up to conversation of 7/9/82

I informed Ms. Alexander that a refund should be obtained from the Citizens For David Obey and that the committee should not transfer funds from the non-voluntary educational fund to the voluntary fund. I suggested that an escrow account be established to hold transfers from local unions for a ten day period. This would enable the PEP to determine the legality of the funds in accordance with 11 C.F.R. 103.3(b)(1)(2). In addition I informed her that if they choose to establish an escrow account, their Statement of Organization should be amended to reflect this. Ms. Alexander asked that I also inform Mr. Vrataric, the committees treasurer, of the need for an escrow account. In response to this information, Mr. Vrataric stated that the non-voluntary educational fund was currently being used as an escrow account and expressed concern that opening a new account would require altering their bookkeeping methods and be of additional cost to the committee, since such an account would often have a zero balance. I explained that funds should not be transferred from the non-voluntary educational fund to the voluntary fund and that an escrow account would be a viable method to avoid this type of transfer. Mr. Vrataric stated that he would make a determination on the matter after further consideration.

3304010053



UNITED PAPERWORKERS INTERNATIONAL UNION

International Headquarters: 702 Church Street, P.O. Box 1475, Nashville, Tennessee 37202
Telephone: 615-254-6666

WAYNE E. GLENN
President

NICHOLAS C. VRATARIC
Secretary-Treasurer

CERTIFIED MAIL NO. 854894

July 14, 1982

*ATTACHMENT
22
(PAGE 1)*

Mike Tangney, Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street
Washington DC 20463

REFERENCE: MID-YEAR REPORT (1/1/81-6/30/81) & Your letter dated 6-30-82
OCTOBER QUARTERLY REPORT (7/1/81-9/30/81) & 6/30/82 Letter
YEAR-END REPORT (10/16/81-12/31/81) & Your letter dated 6-30-82
APRIL 15 QUARTERLY REPORT (1/1/82-3/30/82) & letter dated 6/30/82

Dear Mike:

Enclosed herewith you will find four Amended Reports in accordance with the reference listing above. We have amended these Reports as requested in your letters of June 30th. These four Reports cover the Voluntary Fund only as specified by your instructions.

This should answer your questions and clear up any confusion in the future.

Yours truly,

Nicholas C. Vratavic
Secretary-Treasurer

NCV/dsa
Enclosures

83040100335



REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

RECEIVED
82 JUL 20 AIO: 47

(Summary Page)

Attachment (Page 2)

1. Name of Committee (in Full)
**UNITED PAPERWORKERS INTERNATIONAL UNION
POLITICAL EDUCATION PROGRAM**

Address (Number and Street)
**P.O. BOX 1475
702 CHURCH STREET**

City, State and ZIP Code
NASHVILLE TN 37202

Check if address is different than previously reported.

2. FEC Identification Number
C 0000 2394

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only) **AMENDED**
 Monthly Report for _____
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

6304040033

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>1/1/81</u> Through <u>6/30/81</u>		
6. (a) Cash on Hand January 1, 19 <u>81</u>		\$ 19,497.72
(b) Cash on Hand at Beginning of Reporting Period	\$ 19,497.72	
(c) Total Receipts (from Line 18)	\$ 13,773.81	\$ 13,773.81
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 33,271.53	\$ 33,271.53
7. Total Disbursements (from Line 28)	\$ 10,500.00	\$ 10,500.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	...	\$ 22,771.53	\$ 22,771.53
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

NICHOLAS C. VRATARIC, SECRETARY-TREASURER
Type or Print Name of Treasurer

Nicholas C. Vratarić
SIGNATURE OF TREASURER

7/13/82
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

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REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

82 JUL 20 10:47
REC'D

(Summary Page)

Attachment 2 of 10

1. Name of Committee (in Full)
**UNITED PAPERWORKERS INTERNATIONAL UNION
POLITICAL EDUCATION PROGRAM**

Address (Number and Street)
**P.O. BOX 1475
702 CHURCH STREET**

City, State and ZIP Code
NASHVILLE TN 37202

Check if address is different than previously reported.

2. FEC Identification Number
C 0000 2394

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report **AMENDED**
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for _____
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

33040400537

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>7/1/81</u> Through <u>9/30/81</u>		
6. (a) Cash on Hand January 1, 19 <u>81</u>		\$ 19,497.72
(b) Cash on Hand at Beginning of Reporting Period	\$ 22,771.53	
(c) Total Receipts (from Line 18)	\$ 5,697.43	\$ 19,471.24
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 28,468.96	\$ 38,968.96
7. Total Disbursements (from Line 28)	\$ 1,000.00	\$ 11,500.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 27,468.96	\$ 27,468.96
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

NICHOLAS C. VRATARIC, SECRETARY-TREASURER
Type or Print Name of Treasurer

Nicholas C. Vratarić
SIGNATURE OF TREASURER

7/13/81
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

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FEC FORM 3X (3/80)

Attachment 22 (1982)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL EDUCATION PROGRAM

83040400339

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
"Riegle for Senate in '82" c/o Glenn B. Goss, Vice President 5610 Crawfordsville Road Indianapolis IN	Senate Campaign	8/31/81	\$1,000.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			\$1,000.00
TOTAL This Period (last page this line number only)			\$1,000.00

RECEIVED

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

82 JUL 20 10:46

(Summary Page)

1. Name of Committee (in Full)
UNITED PAPERWORKERS INTERNATIONAL UNION
POLITICAL EDUCATION PROGRAM

Address (Number and Street)
P.O. BOX 1475
702 CHURCH STREET

City, State and ZIP Code
NASHVILLE TN 37202

Check if address is different than previously reported.

2. FEC Identification Number
C 0000 2394

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report AMENDED
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for _____
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

Attachment 22
(PAGE 8)

000040400390

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	10/1/81 Through 12/31/81		
6. (a) Cash on Hand January 1, 1981		\$ 19,497.72
(b) Cash on Hand at Beginning of Reporting Period	\$ 27,468.96	
(c) Total Receipts (from Line 18)	\$ 6,016.27	\$ 25,487.51
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 33,485.23	\$ 44,985.23
7. Total Disbursements (from Line 28)	\$ 12,000.00	\$ 23,500.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 21,485.23	\$ 21,485.23
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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

For further information, contact:

NICHOLAS C. VRATARIC, SECRETARY-TREASURER
Type or Print Name of Treasurer

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Nicholas C. Vratavic
SIGNATURE OF TREASURER

7/13/82
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

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FEC FORM 3X (3/80)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Attachment 2 (me)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
Name of Committee (in Full)			
UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL EDUCATION PROGRAM			
A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Metzenbaum for Senate 406 New Jersey Avenue, SE Washington DC 20003	Re-election to Senate	11/17/81	\$1,000.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Committee to Re-elect Senator Kennedy P.O. BOX 1400 Boston MA 02205	Re-election to Senate	11/18/81	\$1,000.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Friends of Jim Sasser 116 South 12th Street Nashville TN 37206	Senate Campaign	11/25/81	\$5,000.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Committee to Re-elect Senate Kenneth P.O. BOX 1400 Boston MA 02205	Re-election to Senate	11/25/81	\$4,000.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Citizens for Sarbanes P.O. BOX 10644 Baltimore MD	Senate Campaign	11/25/81	\$1,000.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			\$12,000.00
TOTAL This Period (last page this line number only)			\$12,000.00

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REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

82 JUL 20 10 AIO: 48

1. Name of Committee (in Full)
**UNITED PAPERWORKERS INTERNATIONAL UNION
POLITICAL EDUCATION PROGRAM**

Address (Number and Street)
**P.O. BOX 1475
702 CHURCH STREET**

City, State and ZIP Code
NASHVILLE TN 37202

Check if address is different than previously reported.

2. FEC Identification Number
C 0000 2394

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report **AMENDED**
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for _____
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

**Attachment 2
(PAGE 11)**

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>January 1</u> Through <u>March 30, 1982</u>		
6. (a) Cash on Hand January 1, 1982		\$ 21,485.23
(b) Cash on Hand at Beginning of Reporting Period	\$ 21,485.23	
(c) Total Receipts (from Line 18)	\$ 8,522.40	\$ 8,522.40
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 30,007.63	\$ 30,007.63
7. Total Disbursements (from Line 28)	\$ 1,500.00	\$ 1,500.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ...	\$ 28,507.63	\$ 28,507.63
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

NICHOLAS C. VRATARIC, SECRETARY-TREASURER

Type or Print Name of Treasurer

Nicholas C. Vratarić
SIGNATURE OF TREASURER

7/13/82
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

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FEC FORM 3X (3/80)

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**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)**

Attorney
RECEIVED 20 AIO: 46

Name of Committee (in Full)	Report Covering the Period:	
	From: 1/1/81	To: 3/30/82
	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL EDUCATION PROGRAM		
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	\$ 8,522.40	\$ 8,522.40
(Memo Entry Unitemized \$ <u>8,522.40</u>)		
(b) Political Party Committees	0	0
(c) Other Political Committees	0	0
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)	\$ 8,522.40	\$ 8,522.40
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.)		
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)	\$ 8,522.40	\$ 8,522.40
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES		
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	\$ 1,500.00	\$ 1,500.00
22. INDEPENDENT EXPENDITURES (Use Schedule E)		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)		
24. LOAN REPAYMENTS MADE		
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)		
27. OTHER DISBURSEMENTS		
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	\$ 1,500.00	\$ 1,500.00
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d	\$ 8,522.40	\$ 8,522.40
30. TOTAL CONTRIBUTION REFUNDS from Line 26d		
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)	\$ 8,522.40	\$ 8,522.40
32. TOTAL OPERATING EXPENDITURES from Line 19		
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)		

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SCHEDULE B

ITEMIZED DISBURSEMENTS

AMENDED 1/18/82

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

UNITED PAPERWORKERS INTERNATIONAL UNION POLITICAL EDUCATION PROGRAM

35040100375

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Citizens for David Obey Committee P.O. BOX 1322 Wausau WI 54401	House; 7th District Wisconsin Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/2/82	\$500.00
B. Full Name, Mailing Address and ZIP Code Kostmayer for Congress P.O. BOX 1982 Solebury PA 18963	Purpose of Disbursement House; 8th District; Pennsylvania Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/2/82	\$500.00
C. Full Name, Mailing Address and ZIP Code Melcher for Senate Committee Box 1154 Helena MT 59624	Purpose of Disbursement Senate Campaign - Montana Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/29/82	\$500.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			\$1,500.00
TOTAL This Period (last page this line number only)			\$1,500.00



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1478

Date Filmed 6/17/83 Camera No. --- 2

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