



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1636

Date Filmed 8/3/84 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

All routing slips

12 Day Report and Comment sheets

Documents relating to conciliation including
original pages 2 + 3 of General Counsel's
Report

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

- | | | | |
|-------------------------------------|--|--------------------------|--|
| <input type="checkbox"/> | (1) Classified Information | <input type="checkbox"/> | (6) Personal privacy |
| <input type="checkbox"/> | (2) Internal rules and practices | <input type="checkbox"/> | (7) Investigatory files |
| <input checked="" type="checkbox"/> | (3) Exempted by other statute 2 U.S.C. § 437g
(a)(4) (b)(1) | <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 M. Tansut
date 7/30/84

34040471611



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 27, 1984

Robert Hart, General Counsel
United Transportation Union
14600 Detroit Avenue
Cleveland, Ohio 44107-4250

RE: MUR 1636
Transportation Political
Education League
Thomas J. McGuire, Treasurer

Dear Mr. Hart:

On July 26, 1984, the Commission accepted the conciliation agreement signed by you on behalf of your clients, and a civil penalty, in settlement of violations of 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty 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

84040471612

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Transportation Political) MUR 1636
Education League)
Thomas J. McGuire, Treasurer)

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. The Commission found reason to believe that the Transportation Political Education League ("T-PEL") and its treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(B) by failing to timely file reports.

NOW, THEREFORE, the Commission and 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.

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

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

1. Respondent, T-PEL, is a political committee within the meaning of 2 U.S.C. § 431(4)(B).

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2. On March 12, 1984, T-PEL filed a statement of organization amendment naming Thomas J. McGuire as treasurer.

3. Pursuant to 2 U.S.C. § 434(a)(4)(B), a political committee filing monthly reports is required, through its treasurer, to file such reports no later than the 20th day after the last day of the month. In addition, in lieu of filing the reports otherwise due in November and December of any year in which a regularly scheduled general election is held, a pre-general election report is required to be filed 12 days before the election, a post-general election report is required to be filed 30 days after the election, and a year end report is required to be filed no later than January 31 of the following calendar year.

4. T-PEL's 1982 June Monthly report was required to be filed on June 20, 1982. T-PEL filed its 1982 June Monthly report on June 28, 1982, which was 8 days late.

5. T-PEL's 1982 July Monthly report was required to be filed on July 20, 1982. T-PEL filed its 1982 July Monthly report on July 30, 1982, which was 10 days late.

6. T-PEL's 1982 August Monthly report was required to be filed on August 20, 1982. T-PEL filed its 1982 August Monthly report on September 24, 1982, which was 35 days late.

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7. T-PEL's 1982 September Monthly report was required to be filed on September 20, 1982. T-PEL filed its 1982 September Monthly report on September 28, 1982, which was 8 days late.

8. T-PEL's 1982 October Monthly report was required to be filed on October 20, 1982. T-PEL filed its 1982 October Monthly report on November 2, 1982, which was 13 days late.

9. T-PEL's 1982 12 Day Pre-General Election report was required to be filed on October 21, 1982. T-PEL's 1982 12 Day Pre-General Election report was filed on December 29, 1982, which was 69 days late.

10. T-PEL's 1982 30 Day Post-General Election report was required to be filed on December 2, 1982. T-PEL's 1982 30 Day Post-General Election report was filed on February 16, 1983, which was 76 days late.

11. T-PEL's 1982 Year End report was required to be filed on January 31, 1983. T-PEL's 1982 Year End report was filed on February 28, 1983, which was 28 days late.

12. T-PEL's 1983 February Monthly report was required to be filed on February 20, 1983. T-PEL's 1983 February Monthly report was filed on April 7, 1983, which was 46 days late.

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13. T-PEL's 1983 March Monthly report was required to be filed on March 20, 1983. T-PEL's 1983 March Monthly report was filed on April 21, 1983, which was 32 days late.

14. T-PEL's 1983 April Monthly report was required to be filed on April 20, 1983. T-PEL's 1983 April Monthly report was filed on May 10, 1983, which was 20 days late.

15. T-PEL's 1983 May Monthly report was required to be filed on May 20, 1983. T-PEL's 1983 May Monthly report was filed on June 7, 1983, which was 18 days late.

16. T-PEL's 1983 June Monthly report was required to be filed on June 20, 1983. T-PEL's 1983 June Monthly report was filed on June 27, 1983, which was 7 days late.

17. T-PEL's 1983 July Monthly report was required to be filed on July 20, 1983. T-PEL's 1983 July Monthly report was filed on September 9, 1983, which was 51 days late.

18. T-PEL's 1983 August Monthly report was required to be filed on August 20, 1983. T-PEL's 1983 August Monthly report was filed on September 14, 1983, which was 25 days late.

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19. T-PEL's 1983 September Monthly report was required to be filed on September 20, 1983. T-PEL's 1983 September Monthly report was filed on October 7, 1983, which was 17 days late.

20. T-PEL's 1983 November Monthly report was required to be filed on November 20, 1983. T-PEL's 1983 November Monthly report was filed on November 23, 1983, which was 3 days late.

21. T-PEL's 1984 February Monthly report was required to be filed on February 20, 1984. T-PEL's 1984 February Monthly report was filed on February 22, 1984, which was 2 days late.

V. Respondents' failure to comply with the reporting requirements of 2 U.S.C. S 434(a)(4)(B) is a violation of this section.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Two Thousand Dollars (\$2,000), pursuant to 2 U.S.C. S 437g(a)(5)(A).

VII. 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. S 431, et seq.

VIII. The commission, on request of anyone filing a complaint under 2 U.S.C. S 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

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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.

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

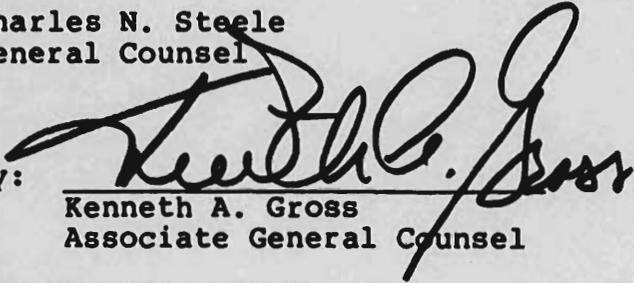
X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

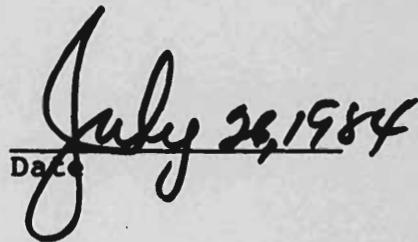
XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

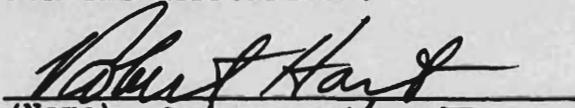
Charles N. Steele
General Counsel

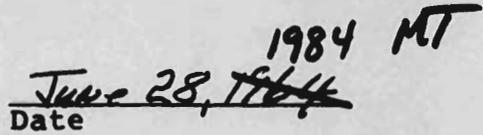
By:


Kenneth A. Gross
Associate General Counsel


Date

FOR THE RESPONDENTS:


(Name) Robert Hart
(Position) General Counsel


Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 6, 1984

MEMORANDUM TO: The File - MUR 1636
FROM: Marybeth Tarrant *MT*
SUBJECT: Signing Date of Conciliation Agreement

On July 6, 1984, I telephoned Robert Hart, General Counsel of the United Transportation Union, informing him of the fact that he dated his signing of the conciliation agreement as June 28, 1964, instead of June 28, 1984. In response, Mr. Hart requested that I change the date so that it reads June 28, 1984. I have made such a change on the original agreement and have so initialed.

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MEMORANDUM

TO: CHERYL THOMAS

TO: JOAN HARRIS

FROM: JOAN HARRIS

FROM: CHERYL THOMAS

CHECK NO. 8387 (a copy of which is attached) RELATING

TO MUR 1636 AND NAME Transportation Political Education League

WAS RECEIVED ON 7/2/84 + Thomas J. McGuire, Treas. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

BUDGET CLEARING ACCCOUNT (#95F3875.16)

CIVIL PENALTIES ACCOUNT (#95-1099.160)

OTHER _____

SIGNATURE Cheryl R. Thomas DATE 7-2-84

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FRED A. HARDIN, NATIONAL CHAIRMAN
J. R. (JIM) SNYDER, NAT'L VICE CHM.
THOMAS J. MC GUINE, NAT'L SEC'Y.-TREAS.

**TRANSPORTATION POLITICAL
EDUCATION LEAGUE**

8387

14800 DETROIT AVENUE
CLEVELAND, OHIO 44107

8-4
410

June 28, 19 84

PAY
TO THE
ORDER OF

"TREASURER OF THE UNITED STATES"

\$ 2,000.00

Exactly Two Thousand Dollars and no cents-----DOLLARS

CENTRAL NATIONAL BANK, CLEVELAND, OHIO

A copy of TPFL's report filed with the appropriate supervisory officer is
available for purchase from the Superintendent of Documents, U. S. Printing
Office, Washington, D. C. 20482

FOR MUR 1636

Thomas J. McGuire
NATIONAL SECY.-TREAS.
Fred A. Hardin
NATIONAL CHAIRMAN

⑈008387⑈ ⑆041000043⑆001⑆ 225578⑈

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1636
Transportation Political)
Education League)
Thomas J. McGuire, Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 26, 1984, the Commission decided by a vote of 5-0 to take the following actions in MUR 1636:

1. Accept the conciliation agreement attached to the General Counsel's Report signed July 23, 1984.
2. Close the file.
3. Send the letter attached to the General Counsel's Report signed July 23, 1984.

Commissioners Aikens, Elliott, Harris, McDonald and McGarry voted affirmatively in this matter; Commissioner Reiche did not cast a vote.

Attest:

7-26-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

7-23-84, 3:52
7-24-84, 11:00

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Transportation Political) MUR 1636
Education League)
Thomas J. McGuire, Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of June 5, 1984, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1636:

1. Find reason to believe that T-PEL and Thomas J. McGuire, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) by failing to file 10 1983/1984 reports in a timely manner.
2. Enter into pre-probable cause conciliation with T-PEL and Thomas J. McGuire.
3. Approve the conciliation agreement attached to the General Counsel's report dated May 24, 1984.
4. Approve the letter attached to the General Counsel's report dated May 24, 1984.

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

Attest:

6-5-84
Date

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

34040471623



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
 FROM: Office of General Counsel *CJ*
 DATE: May 24, 1984
 SUBJECT: MUR 1636 - General Counsel's Report

The attached is submitted as an Agenda document
 for the Commission Meeting of _____
 Open Session _____
 Closed Session _____

CIRCULATIONS

48 Hour Tally Vote
 Sensitive
 Non-Sensitive
 24 Hour No Objection
 Sensitive
 Non-Sensitive
 Information
 Sensitive
 Non-Sensitive

Other

DISTRIBUTION

Compliance
 Audit Matters
 Litigation
 Closed MUR Letters
 Status Sheets
 Advisory Opinions

Other (see distribution below)

34040471624

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

In the Matter of)	
)	
Transportation Political)	MUR 1636
Education League)	
Thomas J. McGuire, Treasurer)	

34 MAY 24 P 2: 50

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On February 28, 1984, the Commission found reason to believe that the Transportation Political Education League ("T-PEL") and John H. Shephard 1/, as treasurer, had violated 2 U.S.C. § 434(a) (4) (B) by failing to file 8 1982 reports in a timely manner. The reports ranged between 8 and 76 calendar days late. A letter notifying the respondents of the Commission's finding was sent on February 29, 1984. As no response was received, this office contacted T-PEL on March 29, 1984. According to a T-PEL staff member, Judy Brazeal, the Commission's letter was never received by the committee. Ms. Brazeal attributed this to the change in treasurers.

On April 3, 1984, this office sent a copy of the reason to believe notification to Ms. Brazeal. As still no response was received, Ms. Brazeal was contacted again on April 30, 1984. According to Ms. Brazeal, respondents' failure to respond was due to the fact that Mr. McGuire, the present treasurer, had been out of town. She added that T-PEL did not have anything else to say besides what was stated in their initial response, which had been

1/ On March 12, 1984, T-PEL filed a statement of organization amendment naming Thomas J. McGuire as treasurer.

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directed to the Reports Analysis Division. This office suggested to Ms. Brazeal that respondents might still wish to send in a response of some kind. On May 11, 1984, this office received a request for pre-probable cause conciliation from respondents' designated counsel. See Attachment 1.

II. ADDITIONAL FINDING

With regard to the 1983/1984 election cycle, T-PEL has filed the following reports late: 1983 February Monthly (46 days late), 1983 March Monthly (32 days late), 1983 April Monthly (20 days late), 1983 May Monthly (18 days late), 1983 June Monthly (7 days late), 1983 July Monthly (51 days late), 1983 August Monthly (25 days late), 1983 September Monthly (17 days late), 1983 November Monthly (3 days late), and 1984 February Monthly (2 days late).

Pursuant to 2 U.S.C. § 434(a)(4)(B), a political committee filing monthly reports is required, through its treasurer, to file such reports no later than the 20th day after the last day of the month. As T-PEL has filed 10 reports late during the 1983/1984 election cycle, the Office of General Counsel recommends that the Commission find reason to believe that T-PEL and Thomas McGuire, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

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IV. RECOMMENDATIONS

1. Find reason to believe that T-PEL and Thomas J. McGuire, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) by failing to file 10 1983/1984 reports in a timely manner.
2. Enter into pre-probable cause conciliation with T-PEL and Thomas J. McGuire.

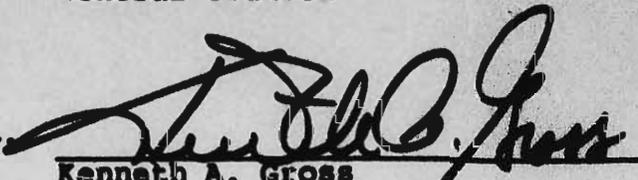
2/ On May 21, 1984, a staff member spoke to Robert Hart, counsel for the Respondents, regarding the late 1983/1984 reports. This Office indicated its intent to make reason to believe recommendations concerning those reports. Mr. Hart indicated that he wanted the pre-probable cause conciliation request to apply to both the 1981/1982 and 1983/1984 reports.

11

3. Approve the attached conciliation agreement.
4. Approve the attached letter.

Charles N. Steele
General Counsel

May 24, 1984
Date

By: 
Kenneth A. Gross
Associate General Counsel

Attachments

1. Response from T-PEL
2. Proposed Letter
3. Proposed Conciliation Agreement

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Attachment 1

TRANSPORTATION POLITICAL EDUCATION LEAGUE

14800 DETROIT AVENUE B2:42 CLEVELAND, OHIO 44107-4350

FRED A. HARDIN, National Chairman
J. R. (JIM) SNYDER, National Vice Chairman
THOMAS J. MCGUIRE, National Sec. & Treas.

A copy of our report filed with the appropriate
supervisory officer is available for purchase
from the Superintendent of Documents, U.S.
Printing Office, Washington, D. C. 20402



May 3, 1984

Federal Election Commission
Attn: Kenneth A. Gross,
Associate General Counsel
Washington, DC 20463

Re: MUR 1636

Dear Mr. Gross:

This has reference to your letter of April 3, 1984 addressed to Judy Brazeal (copy attached) concerning the Commission's correspondence in connection with the above matter.

Enclosed with his letter is the executed statement of designation of counsel signed by Thomas J. McGuire designating the undersigned to correspond on this matter. Ms. Brazeal correctly advised you on March 29, 1984 that we had been unable to locate a copy of the correspondence dated February 29, 1984 addressed to John H. Shepherd concerning this matter.

It is noted that in the General Counsel's Factual and Legal Analysis a listing is made of the monthly reports in 1982 that were filed late. In the footnote on page 2 of the analysis also states that for 1983 the February Monthly, March Monthly, April Monthly, May Monthly, June Monthly, July Monthly, August Monthly, September Monthly, November Monthly, December Monthly and Year End were also filed late. It is our belief that as far as the footnote is concerned the November and December Monthly and Year End Reports were not filed late. They were postmarked within the filing period and we of course have registered receipts to verify this. We do not dispute that the other reports for the year 1983 were late filed. In previous correspondence from this Committee, by Mr. Shepherd, then Treasurer of the Committee, advised that he was not aware that these reports had not been filed on time and that steps had been taken to bring about their timely filing. These steps were initiated after the September, 1983 Monthly Report was filed to assure timely filing for the future.

The Committee feels that it has taken proper steps to see that the reports are timely filed and we have no other explanation that we can offer. In the February 29 letter it is advised as follows:

"In the absence of any additional information which demonstrates that no further action should be taken against you and the 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)."

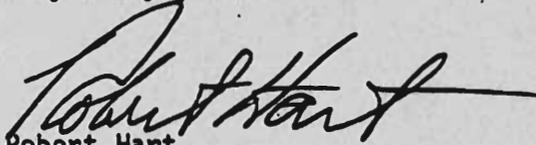
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Federal Election Commission
Attn: Kenneth A. Gross
Page two
May 3, 1984

2

We certainly have no desire to have a finding made against us and would certainly be willing to enter into a settlement through conciliation of this matter.

Very truly yours,



Robert Hart
General Counsel

Enclosures

cc: Mr. T. J. McGuire, NS&T-TPEL
Ms. Judy Brazeal, Manager
Legislative and Education Dept.

34040471630



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 24, 1984

Robert Hart, General Counsel
United Transportation Union
14600 Detroit Avenue
Cleveland, Ohio 44107

Re: MUR 1636
Transportation Political
Education League
Thomas J. McGuire, Treasurer

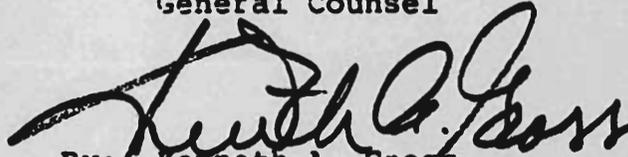
Dear Mr. Hart:

This letter is to confirm your conversation of May 21, 1984, with Marybeth Tarrant of this Office. During that conversation, you were informed of this Office's intent to make reason to believe recommendations to the Commission regarding the late filing of reports during the 1983/1984 election cycle. In response, you indicated that you wanted your pre-probable cause conciliation request on behalf of your clients to apply to both the 1981/1982 and 1983/1984 reports, which is what this Office will recommend to the Commission.

Should you have any questions, please call Ms. Tarrant at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

84040471631



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

**Robert Hart, General Counsel
United Transportation Union
14600 Detroit Avenue
Cleveland, Ohio 44107**

**Re: MUR 1636
Transportation Political
Education League
Thomas J. McGuire, Treasurer**

Dear Mr. Hart:

This letter is to confirm your conversation of May 21, 1984, with Marybeth Tarrant of this Office. During that conversation, you were informed of this Office's intent to make reasonable recommendations to the Commission regarding the late filing of reports during the 1983/1984 election cycle. In response, you indicated that you wanted your pre-probable cause conciliation request on behalf of your clients to apply to both the 1981/1982 and 1983/1984 reports, which is what this Office will recommend to the Commission.

Should you have any questions, please call Ms. Tarrant at (202)523-4000.

Sincerely,

**Charles N. Steele
General Counsel**

**By: Kenneth A. Gross
Associate General Counsel**

84040471632



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/SUSAN M. TEIR *SMT*

DATE: MAY 15, 1984

SUBJECT: MUR 1636 - COMPREHENSIVE INVESTIGATIVE
REPORT #1 signed May 11, 1984

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 4:00 on May 14, 1984.

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

84040471633



FEDERAL ELECTION COMMISSION
 WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
 FROM: Office of General Counsel *Col*
 DATE: May 14, 1984
 SUBJECT: MUR 1636 - Comprehensive Investigative Report #1

The attached is submitted as an Agenda document
 for the Commission Meeting of _____
 Open Session _____
 Closed Session _____

CIRCULATIONS

DISTRIBUTION

48 Hour Tally Vote	[]	Compliance	[x]
Sensitive	[]	Audit Matters	[]
Non-Sensitive	[]	Litigation	[]
24 Hour No Objection	[X]	Closed MUR Letters	[]
Sensitive	[X]	Status Sheets	[]
Non-Sensitive	[]	Advisory Opinions	[]
Information	[]	Other (see distribution below)	[]
Sensitive	[]		
Non-Sensitive	[]		
Other	[]		

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

84 MAY 14 9:17

In the Matter of)
)
Transportation Political Education)
League)
Thomas J. McGuire, Treasurer)

MUR 1636

COMPREHENSIVE INVESTIGATIVE REPORT # 1

On February 28, 1984, the Commission found reason to believe that the Transportation Political Education League ("T-PEL") and John H. Shephard */, as treasurer, had violated 2 U.S.C. § 434(a) (4)(B) by failing to file eight 1982 reports in a timely manner. A letter notifying the respondents of the Commission's finding was sent on February 29, 1984. As no response was received, this office contacted T-PEL on March 29, 1984. According to T-PEL staff member Judy Brazil, the Commission's letter was never received by the committee. Ms. Brazil attributed this to the change in treasurers.

On April 3, 1984, this office sent a copy of the reason to believe notification to Ms. Brazil. As still no response was received, Ms. Brazil was contacted again on April 30, 1984. According to Ms. Brazil, respondents' failure to respond was due to the fact that Mr. McGuire, the present treasurer, had been out of town. She added that T-PEL did not have anything else to say besides what was stated in their initial response, which had been directed to the

*/ On March 12, 1984, T-PEL filed a statement of organization amendment naming Thomas J. McGuire as treasurer.

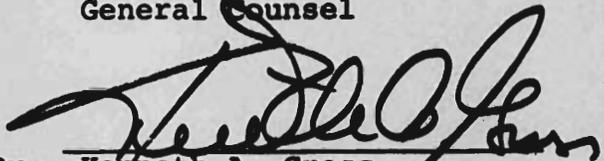
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Reports Analysis Division. This office suggested to Ms. Brazil that respondents might still wish to send in a response of some kind.

As of this date, no response has been received. This office is presently preparing a brief in this matter which will be circulated to the Commission shortly.

May 11, 1964
Date

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

84040471636



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 9, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTN: MARYBETH TARRANT

FROM: SHAWN WOODHEAD
COMPLIANCE BRANCH, RAD

SUBJECT: MUR 1636 - TRANSPORTATION POLITICAL EDUCATION LEAGUE

Please review the attached Request for Additional Information (RAFI) which is to be sent to the Transportation Political Education League for the 1984 February Monthly Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by noon on Friday, May 11th. Thank you.

COMMENTS:

Attachment

34040471637



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Thomas J. McGuire, Treasurer
Transportation Political
Education League
14600 Detroit Avenue
Cleveland, OH 44107

Identification Number: C00001636

Reference: February Monthly Report (1/1/84-1/31/84)

Dear Mr. McGuire:

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 amount of itemized receipts from individuals listed on Schedule A plus the \$69,839.37 unitemized amount reported on Schedule A does not equal the amount reported on Line 11(a) of the Detailed Summary Page (\$72,302.07). Please amend your report to clarify this apparent discrepancy.

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) 523-4048.

Sincerely,

Anthony Raymond
Reports Analyst
Reports Analysis Division

34040471638

44-3125

TRANSPORTATION POLITICAL EDUCATION LEAGUE

14800 DETROIT AVENUE B2:42 CLEVELAND, OHIO 44107-4200

FRED A. HARDIN, National Chairman
J. R. (JIM) SNYDER, National Vice Chairman
THOMAS J. McGUIRE, National Sec. & Treas.

A copy of our report filed with the appropriate supervisory officer is available for purchase from the Superintendent of Documents, U.S. Printing Office, Washington, D. C. 20402



May 3, 1984

Federal Election Commission
Attn: Kenneth A. Gross,
Associate General Counsel
Washington, DC 20463

Re: MUR 1636

Dear Mr. Gross:

This has reference to your letter of April 3, 1984 addressed to Judy Brazeal (copy attached) concerning the Commission's correspondence in connection with the above matter.

Enclosed with his letter is the executed statement of designation of counsel signed by Thomas J. McGuire designating the undersigned to correspond on this matter. Ms. Brazeal correctly advised you on March 29, 1984 that we had been unable to locate a copy of the correspondence dated February 29, 1984 addressed to John H. Shepherd concerning this matter.

It is noted that in the General Counsel's Factual and Legal Analysis a listing is made of the monthly reports in 1982 that were filed late. In the footnote on page 2 of the analysis also states that for 1983 the February Monthly, March Monthly, April Monthly, May Monthly, June Monthly, July Monthly, August Monthly, September Monthly, November Monthly, December Monthly and Year End were also filed late. It is our belief that as far as the footnote is concerned the November and December Monthly and Year End Reports were not filed late. They were postmarked within the filing period and we of course have registered receipts to verify this. We do not dispute that the other reports for the year 1983 were late filed. In previous correspondence from this Committee, by Mr. Shepherd, then Treasurer of the Committee, advised that he was not aware that these reports had not been filed on time and that steps had been taken to bring about their timely filing. These steps were initiated after the September, 1983 Monthly Report was filed to assure timely filing for the future.

The Committee feels that it has taken proper steps to see that the reports are timely filed and we have no other explanation that we can offer. In the February 29 letter it is advised as follows:

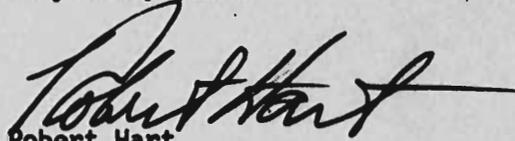
"In the absence of any additional information which demonstrates that no further action should be taken against you and the Committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this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

34040471639

Federal Election Commission
Attn: Kenneth A. Gross
Page two
May 3, 1984

We certainly have no desire to have a finding made against us and would certainly be willing to enter into a settlement through conciliation of this matter.

Very truly yours,



Robert Hart
General Counsel

Enclosures

cc: Mr. T. J. McGuire, NS&T-TPEL
Ms. Judy Brazeal, Manager
Legislative and Education Dept.

84040471640



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 3, 1984

Judy Brazil
Transportation Political Education League
14600 Detroit Avenue
Cleveland, Ohio 44107

Re: MUR 1636

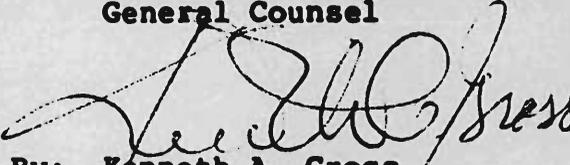
Dear Ms. Brazil:

Pursuant to your telephone conversation of March 29, 1984, with Marybeth Tarrant of this office, enclosed is a copy of the Commission's correspondence dated February 29, 1984, addressed to John H. Shepherd, Treasurer of the Transportation Political Education League ("T-PEL"). It is our understanding that T-PEL did not receive that letter. In addition, we note that Mr. Shepherd is no longer treasurer and that Thomas J. McGuire is the new treasurer. However, as Mr. Shepherd was treasurer at the time of the Commission's consideration of this matter (T-PEL's Statement of Organization amendment was not filed until March 12, 1984), the reason to believe finding with regard to the treasurer was made against him.

Please respond to this notification within 15 days of your receipt of this letter. In the absence of any additional information which demonstrates that no further action should be taken against T-PEL and Mr. Shepherd, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure

84040471641

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1636

NAME OF COUNSEL: Robert Hart, General Counsel

ADDRESS: c/o United Transportation Union

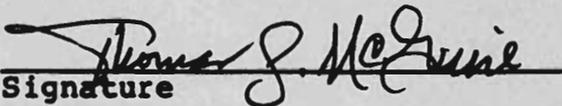
14600 Detroit Avenue

Cleveland, Ohio 44107

TELEPHONE: (216) 228-9400

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

April 30, 1984
Date


Signature

RESPONDENT'S NAME: Transportation Political Education League

ADDRESS: 14600 Detroit Avenue

Cleveland, Ohio 44107

HOME PHONE: (216) 777-7469

BUSINESS PHONE: (216) 228-9400

34040471642

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1636

NAME OF COUNSEL: Robert Hart, General Counsel

ADDRESS: c/o United Transportation Union

14600 Detroit Avenue

Cleveland, Ohio 44107

TELEPHONE: (216) 228-9400

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

April 30, 1984
Date

Thomas J. McGuire
Signature

RESPONDENT'S NAME: Transportation Political Education League

ADDRESS: 14600 Detroit Avenue

Cleveland, Ohio 44107

HOME PHONE: (216) 777-7469

BUSINESS PHONE: (216) 228-9400

34040471643

United States Postage
Postage and Fees Paid

PERMIT NO. 4250 CLEVELAND, OHIO 44107-4250

840404716

Federal Election Commission
Attn: Kenneth A. Gross,
Associate General Counsel
Washington, DC 20463

RECEIVED AT THE FEC

CLEVELAND OHIO
MAY 7 1984

U.S. POSTAGE
AIR MAIL
\$20

3016347



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 3, 1984

Judy Brazil
Transportation Political Education League
14600 Detroit Avenue
Cleveland, Ohio 44107

Re: MUR 1636

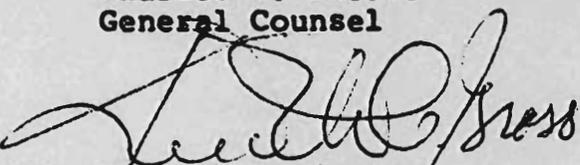
Dear Ms. Brazil:

Pursuant to your telephone conversation of March 29, 1984, with Marybeth Tarrant of this office, enclosed is a copy of the Commission's correspondence dated February 29, 1984, addressed to John H. Shepherd, Treasurer of the Transportation Political Education League ("T-PEL"). It is our understanding that T-PEL did not receive that letter. In addition, we note that Mr. Shepherd is no longer treasurer and that Thomas J. McGuire is the new treasurer. However, as Mr. Shepherd was treasurer at the time of the Commission's consideration of this matter (T-PEL's Statement of Organization amendment was not filed until March 12, 1984), the reason to believe finding with regard to the treasurer was made against him.

Please respond to this notification within 15 days of your receipt of this letter. In the absence of any additional information which demonstrates that no further action should be taken against T-PEL and Mr. Shepherd, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure

84040471645



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 29, 1984

John H. Shepherd, Treasurer
Transportation Political Education League
14600 Detroit Avenue
Cleveland, Ohio 44107

Re: MUR 1636

Dear Mr. Shepherd:

On February 28, 1984, the Federal Election Commission determined that there is reason to believe that the Transportation Political Education League ("the Committee") and you, as treasurer of the Committee, have violated 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by not timely filing reports. 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 and the Committee. 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 you and the 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 and the Committee 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 notifications and other communications from the Commission.

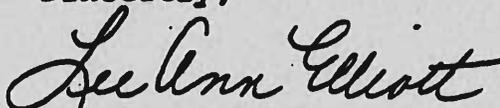
34040471646

Letter to John H. Shepherd
Page 2

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 and the Committee 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 Marybeth Tarrant, the staff member assigned to this matter, at 202-523-4057.

Sincerely,



Lee Ann Elliott,
Chairman

Enclosures

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

34040471647

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1636
STAFF MEMBER(S) & TEL. NO.
Marybeth Tarrant

RESPONDENTS Transportation Political Education League
John H. Shepherd, Treasurer

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

The Transportation Political Education League ("T-PEL") and John H. Shepherd, as treasurer, failed to file eight 1982 reports in a timely manner in violation of 2 U.S.C. § 434(a)(4)(B). The reports ranged between 8 and 76 calendar days late as demonstrated by the following chart:

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
June Monthly (5/1/82-5/31/82)	06/20/82	06/28/82
July Monthly (6/1/82-6/30/82)	07/20/82	07/30/82
August Monthly (7/1/82-7/31/82)	08/20/82	09/24/82
September Monthly (8/1/82-8/31/82)	09/20/82	09/28/82
October Monthly (9/1/82-9/30/82)	10/20/82	11/02/82
12 Day Pre-General (10/1/82-10/13/82)	10/21/82	12/29/82
30 Day Post-General (10/14/82-11/22/82)	12/02/82	02/16/83
Year End (11/23/82-12/31/82)	01/31/83	02/28/83

FACTUAL BASIS AND LEGAL ANALYSIS

A Request for Additional Information was sent by the Reports Analysis Division on August 31, 1983, requesting that T-PEL provide an explanation concerning the late filing of reports. A Second Notice was sent on September 22, 1983, for failure to

34040471648

respond to the first notice. T-PEL's response, received on September 29, 1983, stated that the treasurer had been unaware that the reports had been consistently late, and that a reduction in the number of employees assigned to prepare the reports accounted for the late filing. The letter further stated that steps had been taken to remedy the situation (additional employees will be assigned).

Pursuant to 2 U.S.C. § 434(a)(4)(B), a political committee filing monthly reports is required, through its treasurer, to file such reports no later than the 20th day after the last day of the month. In addition, in lieu of filing the reports otherwise due in November and December of any year in which a regularly scheduled general election is held, a pre-general election report is required to be filed 12 days before the election, a post-general election report is required to be filed 30 days after the election, and a year end report is required to be filed no later than January 31 of the following calendar year.

In view of the fact that the committee has continually failed to file its reports in a timely manner */, and that its financial activity during the 1981-82 election cycle was substantial (\$1,472,222 in total receipts and \$1,348,236 in total disbursements), we recommend that the Commission open a MUR and find reason to believe that reporting violations occurred.

*/ For the Commission's information, T-PEL filed the following 1983 reports late: February Monthly (46 days late), March Monthly (32 days late), April Monthly (28 days late), May Monthly (21 days late), June Monthly (7 days late), July Monthly (55 days late), August Monthly (27 days late), September Monthly (21 days late), November Monthly (3 days late), December Monthly (2 days late), Year End (2 days late).

34040471649

The explanation offered by the committee with respect to its late filing is an insufficient defense in light of the number of reports involved.

34040471650



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Judy Brazil
Transportation Political Education League
14600 Detroit Avenue
Cleveland, Ohio 44107

Re: MUR 1636

Dear Ms. Brazil:

Pursuant to your telephone conversation of March 29, 1984, with Marybeth Tarrant of this office, enclosed is a copy of the Commission's correspondence dated February 29, 1984, addressed to John H. Shepherd, Treasurer of the Transportation Political Education League ("T-PEL"). It is our understanding that T-PEL did not receive that letter. In addition, we note that Mr. Shepherd is no longer treasurer and that Thomas J. McGuire is the new treasurer. However, as Mr. Shepherd was treasurer at the time of the Commission's consideration of this matter (T-PEL's Statement of Organization amendment was not filed until March 12, 1984), the reason to believe finding with regard to the treasurer was made against him.

Please respond to this notification within 15 days of your receipt of this letter. In the absence of any additional information which demonstrates that no further action should be taken against T-PEL and Mr. Shepherd, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure

MT
4/2/84

34040471651



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 28, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTN: MARYBETH TARRANT

FROM: SHAWN WOODHEAD
COMPLIANCE BRANCH, RAD

SUBJECT: TRANSPORTATION POLITICAL EDUCATION LEAGUE - MUR 1636

Please review the attached Request for Additional Information (RAI) which is to be sent to the Transportation Political Education League for the 1983 October Monthly, November Monthly, December Monthly and Year End Reports. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by noon on Friday, March 30, 1984. Thank you.

COMMENTS:

Attachment

84040471652



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

John H. Shepherd, Treasurer
Transportation Political Education League
14600 Detroit Avenue
Cleveland, OH 44107

Identification Number: C00001636

Reference: October Monthly (9/1/83-9/30/83) November Monthly
(10/1/83-10/31/83) December Monthly (11/1/83-
11/30/83) and Year End (12/1/83-12/31/83) Reports

Dear Mr. Shepherd:

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:

-On Schedule A supporting Line 11a of the Detailed Summary Page, your report disclosed contributions from individuals which omit dates. Please amend your report by supplying the omitted information.

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) 523-4048.

Sincerely,

Anthony Raymond
Reports Analyst
Reports Analysis Division

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3



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 29, 1984

John H. Shepherd, Treasurer
Transportation Political Education League
14600 Detroit Avenue
Cleveland, Ohio 44107

Re: MUR 1636

Dear Mr. Shepherd:

On February 28, 1984, the Federal Election Commission determined that there is reason to believe that the Transportation Political Education League ("the Committee") and you, as treasurer of the Committee, have violated 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by not timely filing reports. 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 and the Committee. 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 you and the 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 and the Committee 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 notifications and other communications from the Commission.

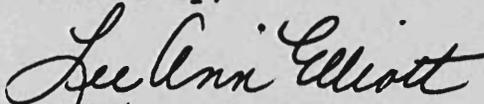
34040471654

Letter to John H. Shepherd
Page 2

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 and the Committee 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 Marybeth Tarrant, the staff member assigned to this matter, at 202-523-4057.

Sincerely,



Lee Ann Elliott,
Chairman

Enclosures

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

34040471655

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1636
STAFF MEMBER(S) & TEL. NO.
Marybeth Tarrant

RESPONDENTS Transportation Political Education League
John H. Shepherd, Treasurer

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

The Transportation Political Education League ("T-PEL") and John H. Shepherd, as treasurer, failed to file eight 1982 reports in a timely manner in violation of 2 U.S.C. § 434(a)(4)(B). The reports ranged between 8 and 76 calendar days late as demonstrated by the following chart:

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
June Monthly (5/1/82-5/31/82)	06/20/82	06/28/82
July Monthly (6/1/82-6/30/82)	07/20/82	07/30/82
August Monthly (7/1/82-7/31/82)	08/20/82	09/24/82
September Monthly (8/1/82-8/31/82)	09/20/82	09/28/82
October Monthly (9/1/82-9/30/82)	10/20/82	11/02/82
12 Day Pre-General (10/1/82-10/13/82)	10/21/82	12/29/82
30 Day Post-General (10/14/82-11/22/82)	12/02/82	02/16/83
Year End (11/23/82-12/31/82)	01/31/83	02/28/83

FACTUAL BASIS AND LEGAL ANALYSIS

A Request for Additional Information was sent by the Reports Analysis Division on August 31, 1983, requesting that T-PEL provide an explanation concerning the late filing of reports. A Second Notice was sent on September 22, 1983, for failure to

84040471656

respond to the first notice. T-PEL's response, received on September 29, 1983, stated that the treasurer had been unaware that the reports had been consistently late, and that a reduction in the number of employees assigned to prepare the reports accounted for the late filing. The letter further stated that steps had been taken to remedy the situation (additional employees will be assigned).

Pursuant to 2 U.S.C. § 434(a)(4)(B), a political committee filing monthly reports is required, through its treasurer, to file such reports no later than the 20th day after the last day of the month. In addition, in lieu of filing the reports otherwise due in November and December of any year in which a regularly scheduled general election is held, a pre-general election report is required to be filed 12 days before the election, a post-general election report is required to be filed 30 days after the election, and a year end report is required to be filed no later than January 31 of the following calendar year.

In view of the fact that the committee has continually failed to file its reports in a timely manner */ , and that its financial activity during the 1981-82 election cycle was substantial (\$1,472,222 in total receipts and \$1,348,236 in total disbursements), we recommend that the Commission open a MUR and find reason to believe that reporting violations occurred.

*/ For the Commission's information, T-PEL filed the following 1983 reports late: February Monthly (46 days late), March Monthly (32 days late), April Monthly (28 days late), May Monthly (21 days late), June Monthly (7 days late), July Monthly (55 days late), August Monthly (27 days late), September Monthly (21 days late), November Monthly (3 days late), December Monthly (2 days late), Year End (2 days late).

84040471657

The explanation offered by the committee with respect to its late filing is an insufficient defense in light of the number of reports involved.

84040471658



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

84 FEB 29 A 9: 30

February 29, 1984

MEMORANDUM TO: The Commission
FROM: Charles N. Steele
General Counsel
By: Kenneth A. Gross
Associate General Counsel
SUBJECT: RAD Referral 84NF-13

SENSITIVE

On February 28, 1984 the Commission approved the recommendation that the subject RAD Referral be made a MUR. Therefore, all documents which had previously been identified as RAD Referral 84NF-13 should now become MUR # 1636.

Attachment
Copy of Certification

34040471659

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Transportation Political) RAD Referral #84NF-13
)
Education League)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 28, 1984, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral #84NF-13:

1. Open a MUR.
2. Find reason to believe that the Transportation Political Education League and John H. Shephard, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).
3. Approve the letter and analysis as attached to the First General Counsel's Report dated February 23, 1984.

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

Attest:

2-28-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

2-23-84, 3:13
2-24-84, 2:00

34040471660

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Transportation Political) RAD Referral #84NF-13
Education League)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 28, 1984, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral #84NF-13:

1. Open a MUR.
2. Find reason to believe that the Transportation Political Education League and John H. Shephard, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).
3. Approve the letter and analysis as attached to the First General Counsel's Report dated February 23, 1984.

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

Attest:

2-28-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

2-23-84, 3:13
2-24-84, 2:00

34040471661



FEDERAL ELECTION COMMISSION
 WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
 FROM: Office of General Counsel *WJ*
 DATE: February 23, 1984
 SUBJECT: RAD Referral 84NF-13: First General Counsel's Report

The attached is submitted as an Agenda document
 for the Commission Meeting of _____
 Open Session _____
 Closed Session _____

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Sensitive	<input checked="" type="checkbox"/>	Audit Matters	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Litigation	<input type="checkbox"/>
24 Hour No Objection	<input type="checkbox"/>	Closed MUR Letters	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>	Status Sheets	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Advisory Opinions	<input type="checkbox"/>
Information	<input type="checkbox"/>	Other (see distribution below)	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>		
Non-Sensitive	<input type="checkbox"/>		
Other	<input type="checkbox"/>		

34040471662

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 2/23/84-2:30

84 FEB 23 P 3:13
HAD Referral # 84NF-13
STAFF NUMBER
Marybeth Tarrant

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENTS' NAMES: Transportation Political Education League and
John H. Shepherd, Treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(B)

INTERNAL REPORTS CHECKED: Reports for 1981-82 election cycle

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by
the Reports Analysis Division.

SUMMARY OF ALLEGATIONS

The Transportation Political Education League ("T-PEL") and
John H. Shepherd, as treasurer, failed to file eight 1982 reports
in a timely manner in violation of 2 U.S.C. § 434(a)(4)(B). The
reports ranged between 8 and 76 calendar days late as
demonstrated by the following chart:

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
June Monthly (5/1/82-5/31/82)	06/20/82	06/28/82
July Monthly (6/1/82-6/30/82)	07/20/82	07/30/82
August Monthly (7/1/82-7/31/82)	08/20/82	09/24/82
September Monthly (8/1/82-8/31/82)	09/20/82	09/28/82
October Monthly (9/1/82-9/30/82)	10/20/82	11/02/82
12 Day Pre-General (10/1/82-10/13/82)	10/21/82	12/29/82
30 Day Post-General (10/14/82-11/22/82)	12/02/82	02/16/83
Year End (11/23/82-12/31/82)	01/31/83	02/28/83

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SENSITIVE

FACTUAL AND LEGAL ANALYSIS

A Request for Additional Information was sent by the Reports Analysis Division on August 31, 1983, requesting that T-PEL provide an explanation concerning the late filing of reports. A Second Notice was sent on September 22, 1983, for failure to respond to the first notice. T-PEL's response, received on September 29, 1983, stated that the treasurer had been unaware that the reports had been consistently late, and that a reduction in the number of employees assigned to prepare the reports accounted for the late filing. The letter further stated that steps had been taken to remedy the situation (additional employees will be assigned).

Pursuant to 2 U.S.C. § 434(a)(4)(B), a political committee filing monthly reports is required, through its treasurer, to file such reports no later than the 20th day after the last day of the month. In addition, in lieu of filing the reports otherwise due in November and December of any year in which a regularly scheduled general election is held, a pre-general election report is required to be filed 12 days before the election, a post-general election report is required to be filed 30 days after the election, and a year end report is required to be filed no later than January 31 of the following calendar year.

84040471664

In view of the fact that the committee has continually failed to file its reports in a timely manner */, and that its financial activity during the 1981-82 election cycle was substantial (\$1,472,222 in total receipts and \$1,348,236 in total disbursements), we recommend that the Commission open a MUR and find reason to believe that reporting violations occurred.

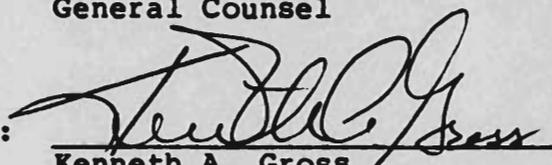
The explanation offered by the committee with respect to its late filing is an insufficient defense in light of the number of reports involved.

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Transportation Political Education League and John H. Shepherd, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).
3. Approve the attached letter and analysis.

Charles N. Steele
General Counsel

By:


Kenneth A. Gross
Associate General Counsel

February 23, 1984
Date

Attachments

1. RAD Referral
2. Proposed letter and analysis

*/ For the Commission's information, T-PEL filed the following 1983 reports late: February Monthly (46 days late), March Monthly (32 days late), April Monthly (28 days late), May Monthly (21 days late), June Monthly (7 days late), July Monthly (55 days late), August Monthly (27 days late), September Monthly (21 days late), November Monthly (3 days late), December Monthly (2 days late), Year End (2 days late).

34040471665

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 13 January 1984ANALYST: Pamela Brown

I. COMMITTEE: Transportation Political Education
League (C00001636)
John H. Shepherd, Treasurer
14600 Detroit Avenue
Cleveland, OH 44107

II. RELEVANT STATUTE: 2 U.S.C. 434(a)(4)(B)
11 CFR 104.5(c)(3)

III. BACKGROUND:

Failure to File Timely Reports

The Transportation Political Education League ("T-PEL") failed to file eight (8) reports during the 1981-82 election cycle in a timely manner. The reports ranged between 8 and 76 calendar days late (see chart below and Attachments 2a-h).

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
June Monthly (5/1/82-5/31/82)	6/20/82	6/28/82
July Monthly (6/1/82-6/30/82)	7/20/82	7/30/82
August Monthly (7/1/82-7/31/82)	8/20/82	9/24/82
September Monthly (8/1/82-8/31/82)	9/20/82	9/28/82
October Monthly (9/1/82-9/30/82)	10/20/82	11/2/82
12 Day Pre-General (10/1/82-10/13/82)	10/21/82	12/29/82
30 Day Post-General */ (10/14/82-11/22/82)	12/2/82	2/16/83
Year End (11/23/82-12/31/82)	1/31/83	2/28/83

*/ T-PEL was notified on February 8, 1983 that the 30 Day Post-General Election Report had not been received by the Commission. (Attachment 3).

84040471666

A Request for Additional Information was sent on August 31, 1983 requesting that T-PEL provide an explanation concerning the late filing of reports (Attachment 4). A Second Notice was sent on September 22, 1983 for failure to respond to the first notice (Attachment 3). T-PEL's response, received on September 29, 1983, stated that the treasurer had been unaware that the reports had been consistently late, and that a reduction in the number of employees assigned to prepare the reports accounted for the late filing. The letter further stated that steps had been taken to remedy the situation (additional employees will be assigned) (Attachment 5).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

84040471667

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
TRANSPORTATION POLITICAL EDUCATION LEAGUE CONNECTED ORGANIZATION: TRANSPORTATION UNION; UNITED				NON-PARTY QUALIFIED		ID #C00001636
1981	FEBRUARY MONTHLY	52,698	29,387	1JAN81 -31JAN81	11	81FEC/191/4267
	FEBRUARY MONTHLY - AMENDMENT	52,698	29,387	1JAN81 -31JAN81	1	82FEC/225/5368
	MARCH MONTHLY	45,132	35,119	1FEB81 -28FEB81	13	81FEC/193/8777
	MARCH MONTHLY - AMENDMENT	45,132	35,119	1FEB81 -28FEB81	1	82FEC/225/5366
	APRIL MONTHLY	56,168	28,155	1MAR81 -31MAR81	13	81FEC/195/0017
	APRIL MONTHLY - AMENDMENT	56,168	28,155	1MAR81 -31MAR81	1	82FEC/225/5364
	MAY MONTHLY	50,586	38,290	1APR81 -30APR81	17	81FEC/196/0491
	JUNE MONTHLY	47,651	46,849	1MAY81 -31MAY81	14	81FEC/197/35
	JULY MONTHLY	53,004	34,290	1JUN81 -30JUN81	11	81FEC/201/2101
	AUGUST MONTHLY	51,807	34,229	1JUL81 -31JUL81	12	81FEC/205/1237
	SEPTEMBER MONTHLY	49,728	4,686	1AUG81 -31AUG81	10	81FEC/206/3097
	OCTOBER MONTHLY	55,797	24,978	1SEP81 -30SEP81	16	81FEC/208/2048
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP81 -30SEP81	1	82FEC/238/4846
	REQUEST FOR ADDITIONAL INFORMATION			1SEP81 -30SEP81	1	82FEC/238/0609
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1SEP81 -30SEP81	2	82FEC/231/5314
	NOVEMBER MONTHLY	53,927	30,426	1OCT81 -31OCT81	22	81FEC/210/1460
	NOVEMBER MONTHLY - AMENDMENT	-	-	1OCT81 -31OCT81	1	82FEC/238/4847
	REQUEST FOR ADDITIONAL INFORMATION			1OCT81 -31OCT81	1	82FEC/238/0611
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT81 -31OCT81	1	82FEC/232/0693
	DECEMBER MONTHLY	52,244	18,570	1NOV81 -30NOV81	17	81FEC/211/4425
	DECEMBER MONTHLY - AMENDMENT	-	-	1NOV81 -30NOV81	1	82FEC/238/4845
	REQUEST FOR ADDITIONAL INFORMATION			1NOV81 -30NOV81	1	82FEC/238/0607
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1NOV81 -30NOV81	1	82FEC/232/0692
	YEAR-END	56,401	11,543	1DEC81 -31DEC81	14	82FEC/223/1191
	YEAR-END - AMENDMENT	-	-	1DEC81 -31DEC81	6	82FEC/232/1014
	REQUEST FOR ADDITIONAL INFORMATION			1DEC81 -31DEC81	1	82FEC/238/0268
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1DEC81 -31DEC81	1	82FEC/232/0695
	COMP ADJUST AMEND	0	0	1JAN81 -31MAR81	2	81FEC/196/0498
1982	FEBRUARY MONTHLY	56,124	23,170	1JAN82 -31JAN82	9	82FEC/224/31
	MARCH MONTHLY	56,886	25,620	1FEB82 -28FEB82	12	82FEC/225/46
	APRIL MONTHLY	55,733	80,682	1MAR82 -31MAR82	19	82FEC/230/0452
	MAY MONTHLY	55,619	51,455	1APR82 -30APR82	27	82FEC/232/0589
	JUNE MONTHLY	53,845	78,265	1MAY82 -31MAY82	26	82FEC/234/2988
	JUNE MONTHLY - AMENDMENT	-	-	1MAY82 -31MAY82	1	83FEC/284/0503
	REQUEST FOR ADDITIONAL INFORMATION			1MAY82 -31MAY82	1	83FEC/282/3030
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1MAY82 -31MAY82	3	83FEC/283/4091
	JULY MONTHLY	60,395	167,062	1JUN82 -30JUN82	40	82FEC/239/5244
	JULY MONTHLY - AMENDMENT	-	-	1JUN82 -30JUN82	1	83FEC/284/0504
	REQUEST FOR ADDITIONAL INFORMATION			1JUN82 -30JUN82	1	83FEC/282/3031
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUN82 -30JUN82	1	83FEC/283/4359
	AUGUST MONTHLY	155,041	61,058	1JUL82 -31JUL82	28	82FEC/244/2613
	AUGUST MONTHLY - AMENDMENT	-	-	1JUL82 -31JUL82	1	83FEC/284/0505
	1'ST LETTER INFORMATIONAL NOTICE			1JUL82 -31JUL82	1	82FEC/266/0848
	REQUEST FOR ADDITIONAL INFORMATION			1JUL82 -31JUL82	1	83FEC/282/3032

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	REQUEST FOR ADDITIONAL INFORMATION 2ND SEPTEMBER MONTHLY	113,813	176,280	1JUL82 -31JUL82 1AUG82 -31AUG82	1 49	83FEC/283/4360 82FEC/244/4747
	SEPTEMBER MONTHLY - AMENDMENT	-	-	1AUG82 -31AUG82	1	83FEC/284/0506
	1'ST LETTER INFORMATIONAL NOTICE			1AUG82 -31AUG82	1	82FEC/260/0850
	REQUEST FOR ADDITIONAL INFORMATION			1AUG82 -31AUG82	1	83FEC/282/3033
	REQUEST FOR ADDITIONAL INFORMATION 2ND OCTOBER MONTHLY	62,904	103,308	1AUG82 -31AUG82 1SEP82 -30SEP82	1 55	83FEC/283/4361 82FEC/253/3414
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP82 -30SEP82	1	83FEC/284/0507
	1'ST LETTER INFORMATIONAL NOTICE			1SEP82 -30SEP82	1	82FEC/259/4228
	REQUEST FOR ADDITIONAL INFORMATION			1SEP82 -30SEP82	1	83FEC/282/3034
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1SEP82 -30SEP82	1	83FEC/283/4362
	PRE-GENERAL	0	123,796	1OCT82 -13OCT82	42	83FEC/260/3111
	PRE-GENERAL - AMENDMENT	-	-	1OCT82 -13OCT82	1	83FEC/284/0508
	REQUEST FOR ADDITIONAL INFORMATION			1OCT82 -13OCT82	1	83FEC/282/3035
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT82 -13OCT82	1	83FEC/283/4363
	POST-GENERAL	55,169	97,893	14OCT82 -22NOV82	54	83FEC/266/2667
	POST-GENERAL - AMENDMENT	-	-	14OCT82 -22NOV82	3	83FEC/270/3674
	POST-GENERAL - AMENDMENT	-	-	14OCT82 -22NOV82	1	83FEC/284/0509
	REQUEST FOR ADDITIONAL INFORMATION			14OCT82 -22NOV82	2	83FEC/267/3119
	REQUEST FOR ADDITIONAL INFORMATION 2ND			14OCT82 -22NOV82	3	83FEC/269/0316
	REQUEST FOR ADDITIONAL INFORMATION			14OCT82 -22NOV82	1	83FEC/282/3036
	REQUEST FOR ADDITIONAL INFORMATION 2ND			14OCT82 -22NOV82	1	83FEC/283/4364
	YEAR-END	121,550	23,125	23NOV82 -31DEC82	25	83FEC/267/1180
	YEAR-END - AMENDMENT	-	-	23NOV82 -31DEC82	3	83FEC/284/0285
	REQUEST FOR ADDITIONAL INFORMATION			23NOV82 -31DEC82	2	83FEC/282/2750
	REQUEST FOR ADDITIONAL INFORMATION 2ND			23NOV82 -31DEC82	1	83FEC/283/4365
1983	MISCELLANEOUS REPORT			8FEB83 FROM FEC	1	83FEC/266/0303
	TOTAL	1,472,222	0 1,348,236		0	620 TOTAL PAGES

All reports received basic review.

Ending Cash: \$233,895 (12-31-82)
 Debts: -0-

8 4 0 4 0 4 7 1 6 7 0
 FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 29DEC83
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
TRANSPORTATION POLITICAL EDUCATION LEAGUE CONNECTED ORGANIZATION: TRANSPORTATION UNION; UNITED				NON-PARTY QUALIFIED		ID #C00001636
1983	FEBRUARY MONTHLY	44,579	30,530	1JAN83 -31JAN83	12	83FEC/269/1841
	MARCH MONTHLY	50,841	23,260	1FEB83 -28FEB83	11	83FEC/270/4218
	APRIL MONTHLY	77,708	47,886	1MAR83 -31MAR83	14	83FEC/272/0884
	MAY MONTHLY	67,455	43,210	1APR83 -30APR83	14	83FEC/273/1561
	JUNE MONTHLY	58,832	43,890	1MAY83 -31MAY83	15	83FEC/274/1817
	JULY MONTHLY	68,044	45,114	1JUN83 -30JUN83	19	83FEC/282/4868
	AUGUST MONTHLY	55,746	13,000	1JUL83 -31JUL83	8	83FEC/283/0738
	SEPTEMBER MONTHLY	71,229	67,852	1AUG83 -31AUG83	22	83FEC/284/324
	OCTOBER MONTHLY	68,073	85,430	1SEP83 -30SEP83	32	83FEC/285/3982
	NOVEMBER MONTHLY	65,772	61,915	1OCT83 -31OCT83	29	83FEC/288/0540
	DECEMBER MONTHLY	65,368	60,345	1NOV83 -30NOV83	30	83FEC/289/3738
	TOTAL	693,647	0 522,432	0	206	TOTAL PAGES

No reports have been reviewed.

Ending Cash: \$405,111.99 (11-30-83)
 Debts: -0-

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

FORM 1 P 1: 03

(Summary Page)

Attachment 2a

<p>1. Name of Committee (in Full) Transportation Political Education League</p> <hr/> <p>Address (Number and Street) 14600 Detroit Avenue</p> <hr/> <p>City, State and ZIP Code Cleveland, Ohio 44107</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 type="checkbox"/> July 15 Quarterly Report <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 checked="" type="checkbox"/> Monthly Report for <u>May, 1982</u> <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 C00001636</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>5/1/82</u> Through <u>5/31/82</u>		
6. (a) Cash on Hand January 1, 19<u>82</u>		\$ 398,526.93
(b) Cash on Hand at Beginning of Reporting Period	\$ 441,964.23	
(c) Total Receipts (from Line 18)	\$ 53,845.80	\$ 278,210.10
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 495,810.03	\$ 676,737.03
7. Total Disbursements (from Line 28)	\$ 78,265.00	\$ 259,192.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 417,545.03	\$ 417,545.03
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ None	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ None	

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 202-623-4068

John H. Shepherd

Type or Print Name of Treasurer

John H. Shepherd
SIGNATURE OF TREASURER

June 25, 1982

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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0203112908

RECEIVED

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

82 AUG 3 12:13

(Summary Page)

Attachment 2b

1. Name of Committee (in Full)
Transportation Political Education League

Address (Number and Street)
14600 Detroit Avenue

City, State and ZIP Code
Cleveland, Ohio 44107

Check if address is different than previously reported.

2. FEC Identification Number
C00001636

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 June, 1982
 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

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SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>6/1/82</u> Through <u>6/30/82</u>		
6. (a) Cash on Hand January 1, 19 <u>82</u>?		\$398,526.93
(b) Cash on Hand at Beginning of Reporting Period	\$417,545.03	
(c) Total Receipts (from Line 18)	\$ 60,395.60	\$338,605.70
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$477,940.63	\$737,132.63
7. Total Disbursements (from Line 28)	\$167,062.66	\$426,254.66
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	...	\$310,877.97	\$310,877.97
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ None	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ None	

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
Tel Free 800-424-9530
Local 202-623-4088

John H. Shepherd
Type or Print Name of Treasurer
John H. Shepherd
SIGNATURE OF TREASURER

July 29, 1982
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 2a 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 SEP 24 P12:40

(Summary Page)

Attachment 2c

1. Name of Committee (in Full)
Transportation Political Education League

Address (Number and Street)
14600 Detroit Avenue

City, State and ZIP Code
Cleveland, Ohio 44107

Check if address is different than previously reported.

2. FEC Identification Number
C00001636

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 July, 1982
 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

34040471673
02032113613

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>7/1/82</u> Through <u>7/31/82</u>		
6. (a) Cash on Hand January 1, 19 <u>82</u>		\$ 398,526.00
(b) Cash on Hand at Beginning of Reporting Period	\$ 310,877.97	
(c) Total Receipts (from Line 18)	\$ 155,041.55	\$ 493,647.25
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 465,919.52	\$ 892,174.18
7. Total Disbursements (from Line 28)	\$ 61,058.00	\$ 487,312.66
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 404,861.52	\$ 404,861.52
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ None	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ None	

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:

John H. Shepherd
Type or Print Name of Treasurer

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

John H. Shepherd
SIGNATURE OF TREASURER

September 17, 1982
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 3 (1982)

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

SEP 28 11:04

(Summary Page)

Attachment 2d

1. Name of Committee (in Full)
Transportation Political Education League

Address (Number and Street)
600 Detroit Avenue

City, State and ZIP Code
Cleveland, Ohio 44107

Check if address is different than previously reported.

2. FEC Identification Number
001636

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 **AUGUST, 1982**
 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

5. Covering Period **8/1/82** Through **8/31/82**

6. (a) Cash on Hand January 1, 19**82**

7. (b) Cash on Hand at Beginning of Reporting Period

8. (c) Total Receipts (from Line 18)

9. (d) Subtotal (add lines 6(b) and 8(c) for Column A and lines 6(a) and 8(c) for Column B)

10. Total Disbursements (from Line 28)

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

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

13. 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
6(a)		\$ 398,526.93
7(b)	\$ 404,861.52	
8(c)	\$ 113,813.85	\$ 607,461.10
9(d)	\$ 518,675.37	\$1,005,988.03
10	\$ 176,280.00	\$ 663,592.66
11	\$ 342,395.37	\$ 342,395.37
12	\$ None	
13	\$ None	

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 800-424-9630
Local 202-673-4068

John H. Shepherd
Type or Print Name of Treasurer

John H. Shepherd
SIGNATURE OF TREASURER

September 24, 1982
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

(Summary Page)

2 NOV 5 1982
Attachment 2e P12:31

<p>1. Name of Committee (in Full) <u>Transportation Political Education League</u></p> <hr/> <p>Address (Number and Street) <u>14600 Detroit Avenue</u></p> <hr/> <p>City, State and ZIP Code <u>Cleveland, Ohio 44107</u></p> <p><input type="checkbox"/> Check if address is different than previously reported.</p> <hr/> <p>2. FEC Identification Number <u>C00001636</u></p> <hr/> <p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)</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 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 checked="" type="checkbox"/> Monthly Report for <u>September, 1982</u> <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>
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	Column A This Period	Column B Calendar Year-to-Date
SUMMARY		
5. Covering Period <u>9/1/82</u> Through <u>9/30/82</u>		
6. (a) Cash on Hand January 1, 19<u>82</u>		\$ 398,526.95
(b) Cash on Hand at Beginning of Reporting Period	\$ 342,395.37	
(c) Total Receipts (from Line 1B)	\$ 62,904.23	\$ 670,365.33
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 405,299.60	\$ 1,068,892.26
7. Total Disbursements (from Line 2B)	\$ 103,308.50	\$ 766,901.16
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ...	\$ 301,991.10	\$ 301,991.10
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ None	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ None	

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

John H. Shepherd

Type or Print Name of Treasurer

John H. Shepherd
SIGNATURE OF TREASURER

October 29, 1982

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)

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

83 JAN 3 12:30

(Summary Page)

Attachment 2f

<p>1. Name of Committee (in Full) Transportation Political Education League</p> <hr/> <p>Address (Number and Street) 14600 Detroit Avenue</p> <hr/> <p>City, State and ZIP Code Cleveland, Ohio 44107</p> <p><input type="checkbox"/> Check if address is different than previously reported.</p> <p>2. FEC Identification Number C00001636</p> <p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)</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 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 _____</p> <p><input checked="" type="checkbox"/> Pre-Election Report <input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input type="checkbox"/> NO</p>
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SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>10/1/82</u> Through <u>10/13/82</u>		
6. (a) Cash on Hand January 1, 19 <u>82</u>		\$ 398,526.93
(b) Cash on Hand at Beginning of Reporting Period	\$ 301,991.10	
(c) Total Receipts (from Line 18)	\$ None	\$ 670,365.33
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 301,991.10	\$ 1,068,892.26
7. Total Disbursements (from Line 28)	\$ 123,796.60	\$ 890,697.76
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 178,194.50	\$ 178,194.50
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ None	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ None	

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:

John H. Shepherd

Federal Election Commission
Toll Free 800-424-9630
Local 202-623-4088

Type or Print Name of Treasurer

John H. Shepherd
SIGNATURE OF TREASURER

December 22, 1982

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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REPORT OF RECEIPTS AND DISBURSEMENTS
 For a Political Committee Other Than an Authorized Committee **83 FEB 28** **At: 20**

(Summary Page)

Attachment 2h

34040471678
06032571197

1. Name of Committee (in Full)
Transportation Political Education League
Address (Number and Street)
14600 DETROIT AVE
City, State and ZIP Code
CLEVELAND, OHIO 44107
 Check if address is different than previously reported.

2. FEC Identification Number
C00001636

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

4. TYPE OF REPORT (check appropriate boxes)

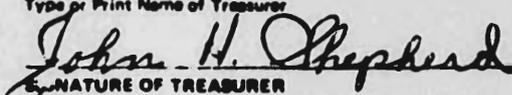
(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for _____
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report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

(b) Is this Report an Amendment?
 YES NO

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>11/23/82</u> Through <u>12/31/82</u>			
6. (a) Cash on Hand January 1, 1982		\$398,526.93
(b) Cash on Hand at Beginning of Reporting Period	\$ 135,469.77	
(c) Total Receipts (from Line 18)	\$ 121,550.41	\$847,084.81
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 257,020.18	\$1,245,611.74
7. Total Disbursements (from Line 28)	\$ 23,125.00	\$1,011,716.56
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 233,895.18	\$233,895.18
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ N	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ N	

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 202-623-4068

John H. Shepherd
 Type or Print Name of Treasurer

 SIGNATURE OF TREASURER

2/15/83
 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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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachment 3

8 February 1983

NSP

John H. Shepherd, Treasurer
Transportation Political Education League
14600 Detroit Avenue
Cleveland, OH 44107

Identification Number: C00001636

Dear Mr. Shepherd:

It has come to the attention of the Federal Election Commission that you have failed to file the 30 Day Post-General Election Report of Receipts and Expenditures as required by the Federal Election Campaign Act. Prior notice was sent to you advising you that this report (covering the period from the closing date of your last report or from the date of registration, whichever is later, through November 22, 1982) was due on December 2, 1982.

It is important for your report to be available on a timely basis for the public record. The report should be filed immediately with the Federal Election Commission, 1325 K Street, N.W., Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file the 30 Day Post-General Election Report may result in audit or legal enforcement action.

If you have any questions regarding this matter, please contact Pamela Brown on our toll-free number (800) 424-9530. Our local number is (202) 357-0026.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

03032660303



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

EQ-2

August 31, 1983

John H. Shepherd, Treasurer
Transportation Political Education
League
14600 Detroit Avenue
Cleveland, OH 44107

Identification Number: C00001636

Reference: 1981-82 Election Cycle Reports

Dear Mr. Shepherd:

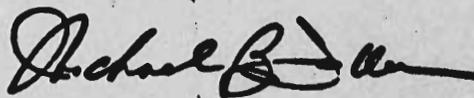
This letter is prompted by the Commission's review of the reports filed by your committee for the 1981-82 election cycle. A review of the reports listed below indicates that your committee repeatedly failed to file reports in a timely manner. Timely filing is a specific requirement of the Federal Election Campaign Act and essential to fulfilling the public disclosure concept embodied in the law. The Commission views late filing as a serious violation of the Act.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
June Monthly (5/1/82-5/31/82)	6/20/82	6/28/82
July Monthly (6/1/82-6/30/82)	7/20/82	7/30/82
August Monthly (7/1/82-7/31/82)	8/20/82	9/24/82
September Monthly (8/1/82-8/31/82)	9/20/82	9/28/82
October Monthly (9/1/82-9/30/82)	10/20/82	11/2/82
12 Day Pre-General (10/1/82-10/13/82)	10/21/82	12/29/82
30 Day Post-General (10/14/82-11/22/82)	12/2/82	2/16/83
Year End (11/23/82-12/31/82)	1/31/83	2/28/83

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This communication affords you the opportunity to present the reasons behind the late tenders noted above. Your response should be filed with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 within fifteen (15) days of the date of this letter. The Commission will consider your response to this notice before taking action in this matter. If you need assistance or have any questions regarding this matter, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,



Michael B. Filler
Chief
Party/Non-Party Branch
Reports Analysis Division

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

80-3

September 22, 1983

John E. Shepherd, Treasurer
Transportation Political Education
League
14600 Detroit Avenue
Cleveland, OH 44107

Identification Number: C00001636

Reference: 1981-82 Election Cycle Reports

Dear Mr. Shepherd:

This letter is to inform you that as of September 21, 1983, the Commission has not received your response to our request dated August 31, 1983. That notice requested information explaining why your committee has repeatedly failed to meet reporting deadlines. 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 enforcement action.

If you should have any questions related to this matter, please contact Michael B. Filler 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

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01032934001

RECEIVED

83 SEP 29 12

TRANSPORTATION POLITICAL EDUCATION LEAGUE

14000 DETROIT AVENUE • CLEVELAND, OHIO 44107

FRED A. HARDY, National Chairman
J. R. (JIM) SNYDER, National Vice Chairman
JOHN H. SHEPHERD, National Sec. & Treas.

A copy of our report filed with the appropriate
supervisory officer is available for purchase
from the Superintendent of Documents, U.S.
Printing Office, Washington, D. C. 20540



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September 27, 1983

Mr. Michael B. Filler, Chief
Party/Non-Party Branch
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Re: Transportation Political Education League
Identification Number: C00001636
1981-82 Election Cycle Reports

Dear Mr. Filler:

This has reference to your letter of August 31, 1983, received September 6, 1983, concerning the Commission's review of reports filed by the Transportation Political Education League for the 1981-82 election cycle. I note that a timely filing is a specific requirement of the Federal Election Campaign Act and that the Commission views the late filing as a serious violation of the Act. I also note that the Commission affords the Transportation Political Education League an opportunity to present reasons behind the late tenders set forth in your letter.

Your letter arrived during my vacation from the office which accounts for the delay in responding to you. As General Secretary and Treasurer of the United Transportation Union I am responsible for the filing of many reports to state and federal agencies. This necessitates that I assign various staff members the responsibility of preparing reports for my signature. I was not aware that these reports had been filed on a consistently late basis until I received your letter. The unit in the office which had been assigned the responsibility of preparing these reports for my signature and filing contained four employees four years ago, these employees were responsible for performing the work of this unit including among other things the filing of the appropriate Election Commission reports. A decline in the membership of the United Transportation Union resulted in there being a reduction in the number of employees in the International office. This has resulted in the unit in question being reduced from four employees to one employee. In addition to the reduction to one employee, new duties were assigned to that

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M. B. Filler

September 27, 1983

employee which has resulted in that employee being unable to prepare the reports for filing in a timely manner. An additional employee has been assigned to this unit, and if necessary, additional employees will be assigned to the unit. In the future I expect the reports to be prepared and filed on time. I have been advised that the Transportation Political Education League may elect to file reports quarterly, rather than monthly, in order to cut down the time spent on these reports. I recognize the seriousness of this situation, however, I assure you that steps have been taken to correct the same. It has never been the purpose of the Transportation Political Education League to in any way avoid the public disclosure concepts embodied by the Federal Election Campaign Act. I think you will find by examining your records that this committee has been audited on at least three occasions by the Federal Election Commission and has complied with the suggestions made by the Commission auditors to improve the reporting efforts of the Transportation Political Education League. I am not making an effort to avoid the responsibility for the failure to file the reports bearing my signature, however, you must understand that in addition to being Treasurer of the Political Education League I am General Secretary and Treasurer of the United Transportation Union and United Transportation Union Insurance Association, and as a result, I cannot personally perform every function, but must rely on subordinates.

In conclusion, I must state that our late filings were not intentional or in any way designed for the purpose of evading the disclosure requirements of the Act. I assure you that steps are being taken to prevent a recurrence of the events cited in your letter. I request that the Commission take no further action on this matter pending subsequent compliance with the time requirements of the Commission in the filing of reports.

Sincerely yours,

John H. Shepherd

National Secretary & Treasurer

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR #

1636

Date Filmed

8/3/84

Camera No. --- 2

Cameraman

JRL

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