



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1645

Date Filmed 3/18/85 Camera No. --- 3

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FEDERAL ELECTION COMMISSION

Routing cards and slips ; 12 Day Report and
Comments; Conciliation reports and correspondence

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):

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

Signed George [Signature]
date 3/14/85

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1645
Committee to Re-elect)
Congressman William D. Ford)
and Theodore Monolidis, Treasurer,)
et. al.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 23, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 1645:

1. Accept the conciliation agreement with Committee to Re-Elect Congressman William D. Ford and Theodore Monolidis, as treasurer, submitted with the General Counsel's Report signed January 17, 1985.
2. Approve the letters attached to the General Counsel's Report signed January 17, 1985.
3. Close the file.

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

Attest:

1-23-85
Date

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

Received in Office of Commission Secretary: 1-17-85, 4:31
Circulated on 48 hour tally basis: 1-18-85, 2:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mitchell J. Notis, Esquire
Deputy General Counsel
American Federation of Government Employees
1325 Massachusetts Avenue, N.W.
Washington, D.C. 20005

RE: MUR 1645
American Federation of Government
Employees Political Action
Committee; James Lynch, Jr.,
Treasurer

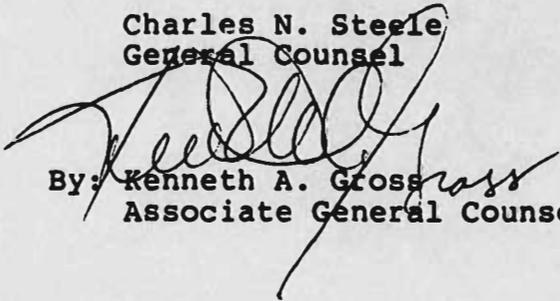
Dear Mr. Notis:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact George Demougeot the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 30, 1985

Michael Ernest Avakian, Esquire
Martha M. Poindexter, Esquire
Center on National Labor Policy
Suite 400
5211 Port Royal Road
Springfield, Virginia 22151

RE: MUR 1645

Dear Mr. Avakian and Ms. Poindexter:

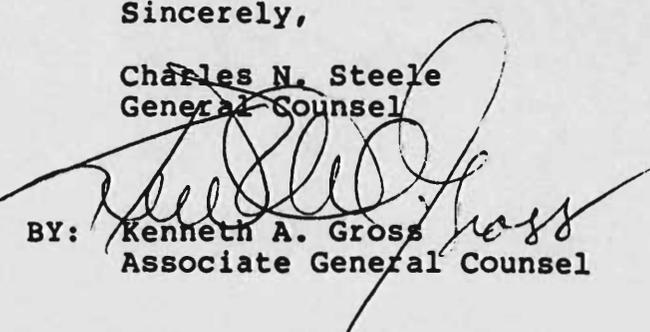
This is in reference to the complaint you filed with the Commission on March 16, 1984, concerning the Committee to Re-elect Congressman William D. Ford and others.

The Commission determined there was reason to believe that the Committee to Re-elect Congressman William D. Ford had violated 2 U.S.C. § 441a(f), and the American Federation of Government Employees Political Action Committee, and the American Federation of Government Employees Committee on Federal Employees Political Education had violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended. On January 23, 1985, a conciliation agreement signed by the Committee to Re-elect Congressman William D. Ford was accepted by the Commission, thereby concluding the matter. Copies of these agreements are enclosed for your information.

The file number of this matter is MUR 1645. If you have any questions, please contact George Demougeot, 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
Conciliation Agreements

85040514641



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 30, 1985

J. Steven Hart, Esquire
William & Jensen
1101 Connecticut Avenue, N.W.
Washington, D.C. 20036

RE: MUR 1645
Committee to Re-elect
Congressman William D. Ford
Theodore Monolidis, Treasurer

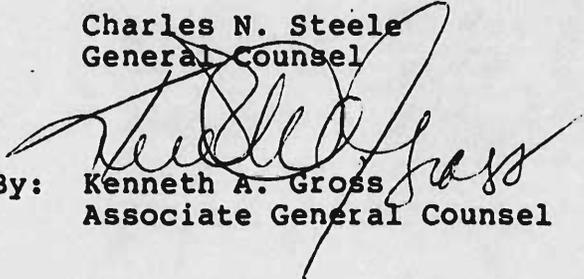
Dear Mr. Hart:

On January 23 , 1985, the Commission accepted the conciliation agreement signed by you in settlement of a violation of 2 U.S.C. § 441a(f), 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

85040514642

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee to Re-elect) MUR 1645
Congressman William D. Ford)
Theodore Monolidis, Treasurer)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by James E. Antosh. The Commission found reason to believe that the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis as treasurer ("Respondent") violated 2 U.S.C. § 441a(f) in 1982 by accepting contributions which exceeded \$5,000 for a single election.

NOW, THEREFORE, the Commission and Respondent, 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 Respondent, 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

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

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

1. Respondent Committee to Re-elect Congressman William D. Ford was the principal campaign committee of William D. Ford in 1981-1982.

2. Theodore Monolidis is the treasurer of the Committee to Re-elect Congressman William D. Ford.

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3. American Federation of Government Employees Committee on Federal Employee Political Education ("AFGE-COFEPE") is a separate segregated fund of a labor organization, the American Federation of Government Employees.

4. AFGE-COFEPE made a contribution \$2,500 to the Committee to Re-elect Congressman William D. Ford on June 15, 1981.

5. American Federation of Government Employees Political Action Committee ("AFGE-PAC") is a separate segregated fund of a labor organization, the American Federation of Government Employees.

6. AFGE-PAC made contributions of \$3,125 to the Committee to Re-elect Congressman William D. Ford on March 10, and April 8, 1982.

7. The Michigan primary was held on August 3, 1982.

8. Respondent contends that contributions made by AFGE-PAC and AFGE-COFEPE to the committee to Re-elect Congressman William D. Ford did not exceed \$10,000 and were intended by AFGE-PAC and AFGE-COFEPE to be divided between the 1982 primary and 1982 general elections.

9. 2 U.S.C. § 441a(a)(2)(A) limits to \$5,000 the contributions which a multicandidate committee may make to a candidate for federal office with respect to any election.

10. 2 U.S.C. § 441a(a)(5) provides that all contributions made by political committees established or financed or maintained or controlled by a labor

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organization, including any parent, subsidiary, branch, division, department, or local unit of such labor organization, are to be considered to have been made by a single committee.

11. Respondent contends that it was unaware of the affiliation between AFGE-PAC and AFGE-COFEPE.

12. Respondent refunded the excess contribution upon notification of complaint and realization that AFGE-PAC and AFGE-COFEPE were affiliated.

13. AFGE-PAC and AFGE-COFEPE in 1982, as affiliated multicandidate committees, shared a \$5,000 contribution limitation per recipient with respect to any election.

14. 2 U.S.C. § 441a(f) prohibits knowing acceptance by a political committee or an officer of a political committee of contributions which exceed the limitations established by 2 U.S.C. § 441a(a) (2) (A).

15. The Committee to Re-elect Congressman William D. Ford received contributions totalling \$5,625 from AFGE-PAC and AFGE-COFEPE. Respondent contends that the \$2,500 contribution it received on April 8, 1982, from AFGE-PAC was to be for the Ford general election campaign. However, AFGE-PAC failed to communicate this designation in writing. Had the contribution been designated in writing for the general election no violation of the Federal Election Campaign Act would have occurred.

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V. By accepting contributions for the 1982 primary election campaign in excess of the \$5,000 limitation established by 2 U.S.C. § 441a(a)(2)(A), the Committee to Re-elect William D. Ford and Theodore Monolidis as treasurer of the Committee to Re-elect William D. Ford, violated 2 U.S.C. § 441a(f).

VI. Respondent contends that it did not knowingly and willfully commit a violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VII. Respondent shall pay a civil penalty to the Treasurer of the United States in the amount of One Hundred and Fifty Dollars (\$150), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

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

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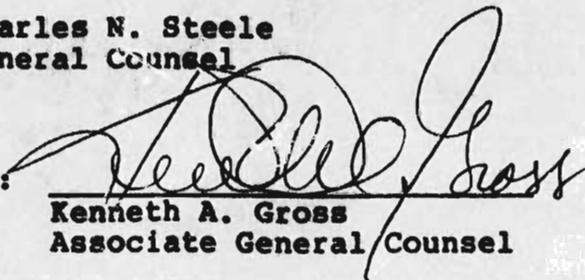
XI. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XII. 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

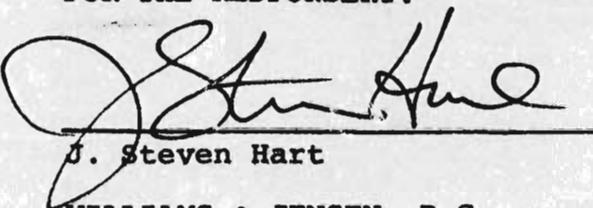
BY:


Kenneth A. Gross
Associate General Counsel

Date

January 9, 1985

FOR THE RESPONDENT:


J. Steven Hart

Date

1/10/85

WILLIAMS & JENSEN, P.C.
1101 Connecticut Avenue, N. W.
Suite 500
Washington, D. C. 20036
(202) 659-8201

Attorneys for the Respondent

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mitchell J. Notis, Esquire
Deputy General Counsel
American Federation of Government Employees
1325 Massachusetts Avenue, N.W.
Washington, D.C. 20005

RE: MUR 1645
American Federation of Government
Employees Political Action
Committee; James Lynch, Jr.,
Treasurer

Dear Mr. Notis:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact George Demougeot the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

GD
1/29/85

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Michael Ernest Avakian, Esquire
Martha M. Poindexter, Esquire
Center on National Labor Policy
Suite 400
5211 Port Royal Road
Springfield, Virginia 22151

RE: MUR 1645

Dear Mr. Avakian and Ms. Poindexter:

This is in reference to the complaint you filed with the Commission on March 16, 1984, concerning the Committee to Re-elect Congressman William D. Ford and others.

The Commission determined there was reason to believe that the Committee to Re-elect Congressman William D. Ford had violated 2 U.S.C. § 441a(f), and the American Federation of Government Employees Political Action Committee, and the American Federation of Government Employees Committee on Federal Employees Political Education had violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended. On , 1985, a conciliation agreement signed by the Committee to Re-elect Congressman William D. Ford was accepted by the Commission, thereby concluding the matter. Copies of these agreements are enclosed for your information.

The file number of this matter is MUR 1645. If you have any questions, please contact George Demougeot, 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
Conciliation Agreements

CS
1/28/85

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ACC# 6496

Committee to Re-Elect

CONGRESSMAN WILLIAM D. FORD

3476 CITY NATIONAL BANK BUILDING / DETROIT, MICHIGAN 48226

Telephone: 861-5870



THEODORE MONOLIDIS
TREASURER

January 15, 1985

5 JAN 23 9:29

Williams & Jensen
ATTN: J. Steven Hart
1101 Connecticut Avenue, N.W.
Washington, D.C. 20036

Re: MUR1645

Dear Steve:

You will please find enclosed our remittance, in the sum of \$150.00, in payment of the penalty owing on the above account.

Very truly yours,

Theodore Monolidis
THEODORE MONOLIDIS

TM:rs
Enc.

5 JAN 23 3:29

85040514650

WILLIAMS & JENSEN
A PROFESSIONAL CORPORATION
LAWYERS

1101 CONNECTICUT AVENUE, N. W.
WASHINGTON, D. C. 20036

TELEPHONE
(202) 659-8201

PAUL ARNESON
GEORGE D. BAKER
WILLIAM T. BRACK
PAUL T. CLARK
ANN S. COSTELLO
WINFIELD P. CRIGLER
JUNE E. EDMONDSON
JOHN P. FORD
ROBERT E. GLENNON
J. STEVEN HART
ROBERT E. JENSEN
JOHN J. MEMACKIN, JR.
GEORGE G. OLSEN
CLIFTON PETER ROSE
MARY LYNNE WHALEN
J. D. WILLIAMS

January 22, 1985

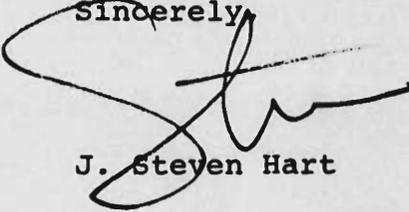
George Demougeot, Esquire
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Dear George:

RE: MUR 1645

Please find enclosed a remittance from the
Committee to Re-Elect Congressman William D. Ford,
in the amount of \$150, in payment of the civil
penalty owing on the above referenced account.
Please contact me if you have any questions.

Sincerely,


J. Steven Hart

JSH/ajb
Enclosures

Final!

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5 JAN 23 4 9:29

8 5 0 1 0 5 1 4 1 3
MEMORANDUM

TO: CHERYL THOMAS
FROM: JOAN HARRIS

TO: JOAN HARRIS
FROM: CHERYL THOMAS

CHECK NO. 2425 (a copy of which is attached) RELATING
TO MUR 1645 AND NAME Comte to Re-Elect
Congressman William D. Ford
WAS RECEIVED ON January 23, 1985. PLEASE INDICATE THE ACCOUNT INTO
WHICH IT SHOULD BE DEPOSITED:

/ / BUDGET CLEARING ACCOUNT (#95F3875.16)
/ CIVIL PENALTIES ACCOUNT (#95-1099.160)
/ / OTHER _____

SIGNATURE C. Thomas DATE 1/24/85

8 5 0 4 0 5 1 4 6 5 0

2425

74-207
724

January 15, 19 85

COMMITTEE TO RE-ELECT
CONGRESSMAN WILLIAM D. FORD
3476 PENOBSCOT BLDG.
DETROIT, MICH. 48226

PAY
TO THE
ORDER OF

Federal Election Commission

\$ 150.00

One Hundred, Fifty and 00/100-----DOLLARS



TAYLOR, MICHIGAN 48180

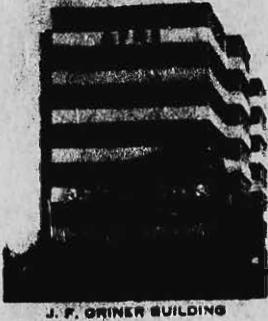
FOR MUR1645 - AFTE Excess Contrib.

CIVIL PENALTY received

#002425# 1:072402076:

31-0857-0r

Spencer M. ...



AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES

AFFILIATED WITH THE AFL-CIO

KENNETH T. BLAYLOCK
NATIONAL PRESIDENT

JOHN N. STURDIVANT
EXECUTIVE VICE PRESIDENT

NICHOLAS J. NOLAN
NATIONAL SEC. TREAS.

1325 MASSACHUSETTS AVE., N.W. · WASHINGTON, D. C. 20005
Telephone: (202) 737-8700



IN REPLY PLEASE REFER TO:

8n/PAC

*MUR 1645
Demougeot*

January 11, 1985

George Demougeot, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1645

Dear Mr. Demougeot:

Pursuant to the Conciliation Agreement which was signed by Kenneth A. Gross on January 3, 1985 and which I received just the other day, please find enclosed a check for \$200 payable to the Treasurer of the United States. I assume that our sending this check to you completes our obligation under paragraph VI of the Conciliation Agreement. If somehow this is not correct, please notify me at once.

I have enjoyed working with you and I hope you have had a pleasant holiday.

Very truly yours,

Mitchell J. Notis
Mitchell J. Notis
Deputy General Counsel

Enclosure

cc: NVP Lynch
J. McMichael
B. Reid

85040514654

TO: CHERYL THOMAS

TO: JOAN HARRIS

GCC# 6406

FROM: JOAN HARRIS

FROM: CHERYL THOMAS

CHECK NO. 175 (a copy of which is attached) RELATING

TO MUR 1645 AND NAME American Federation of Government Employees

WAS RECEIVED ON January 14, 1985. PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

BUDGET CLEARING ACCOUNT (\$95F3875.16)

CIVIL PENALTIES ACCOUNT (\$95-1099.160)

OTHER _____

SIGNATURE

Cheyl R. Thomas

DATE

1/14/85

AMERICAN PAC-BANK

NS&T BANK

Henry Reid
James A. Smith



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 3, 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *AD*
SENIOR COMPLIANCE ANALYST
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1645: AMERICAN FEDERATION OF GOVERNMENT
EMPLOYEES' PAC (AFGEPAC)

Please review the attached Request for Additional Information which is to be sent to the AFGE PAC for the 1984 November 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 12:00 noon on Monday, January 7, 1985. Thank you.

COMMENTS:

OK
GS
1/3/84

Attachment

85040514656



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 4, 1985

Mitchell J. Notis, Esquire
Deputy General Counsel
American Federation of Government Employees
1325 Massachusetts Avenue, N.W.
Washington, D.C. 20005

RE: MUR 1645
American Federation of
Government Employees Political
Action Committee; James Lynch,
Jr., Treasurer

Dear Mr. Notis:

On January 2, 1985, the Commission accepted the conciliation agreement signed by you in settlement of a violation of 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your clients, and it will become a part of the public record within thirty days after this matter has been closed with respect to all other respondents involved. 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 within 10 days.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

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

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
American Federation of)
Government Employees) MUR 1645
Political Action Committee)
James Lynch, Jr. as treasurer)

CONCILIATION AGREEMENT

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This matter was initiated by a signed, sworn, and notarized complaint by James E. Antosh. The Commission found reason to believe that the American Federation of Government Employees Political Action Committee ("AFGE-PAC"), American Federation of Government Employees Committee and Federal Employees Political Education ("AFGE-COFEPE"), and James Lynch, Jr., as treasurer ("Respondent") violated 2 U.S.C. § 441a(a)(2)(A) by making contributions to the Committee to Re-elect Congressman William D. Ford which, when aggregated with contributions to the same committee by committees affiliated with Respondent AFGE-PAC, exceeded \$5,000 for a single election.

NOW, THEREFORE, the Commission and Respondent, 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 Respondent, 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

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

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

1. Respondent AFGE-PAC is a separate segregated fund of a labor organization, the American Federation of Government Employees.

2. James Lynch, Jr. is the treasurer of the AFGE-PAC.

3. American Federation of Government Employees Committee on Federal Employee Political Education ("AFGE-COFEPE") is a separate segregated fund of a labor organization, the American Federation of Government Employees.

4. AFGE-COFEPE made a contribution \$2,500 to the Committee to Re-elect Congressman William D. Ford on June 15, 1981.

5. AFGE-PAC made contributions totalling \$3,125 to the Committee to Re-elect Congressman William D. Ford on March 10, 1982 and April 8, 1982.

6. 11 CFR §110.1(a) in part provides that contributions not designated in writing by a contributor for a particular election are attributable to the primary election if made on or before the date of the primary election.

7. AFGE-PAC contends that the \$2,500 contribution it made on April 8, 1982 to the Committee to Re-elect Congressman William Ford, to be for the Ford general election campaign, yet failed to designate this in writing. Had the contribution been designated in writing for the general election no violation of the Federal Election Campaign Act would have occurred.

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8. As neither AFGE-PAC nor AFGE-COFEPE designated the election for which their contributions to the Committee to Re-elect Congressman William Ford were intended, pursuant to 11 C.F.R. § 110.1(a)(2), all of their contributions are considered to have been made for the 1982 primary election.

9. The aggregated contributions made by AFGE-PAC and AFGE-COFEPE to the Committee to Re-elect Congressman William D. Ford for the 1982 primary election totalled \$5,625.

10. 2 U.S.C. § 441a(a)(2)(A) limits to \$5,000 the contributions which a multicandidate committee may make to a candidate for federal office with respect to any election.

11. 2 U.S.C. § 441a(a)(5) provides that all contributions made by political committees established or financed or maintained or controlled by a labor organization, including any parent, subsidiary, branch, division, department, or local unit of such labor organization, are to be considered to have been made by a single committee.

12. As affiliated multicandidate committees, AFGE-PAC and AFGE-COFEPE in 1982 shared a \$5,000 contribution limitation.

V. By making contributions to the Committee to Re-elect Congressman William D. Ford which, pursuant to 11 C.F.R. § 110.1(a)(2) are all considered as being for the 1982 primary election (due to AFGE-PAC's failure to check the proper box on

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the Schedule B it filed) and which, when aggregated totalled \$5,625, AFGE-PAC, and James Lynch, Jr., as treasurer of AFGE-PAC, and AFGE-COFEPE violated 2 U.S.C. § 441a(a)(2)(A).

VI. Respondent shall pay a civil penalty to the Treasurer of the United States in the amount of Two Hundred Dollars (\$200), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

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.

8 5 0 4 0 5 1 4 6 6 1

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

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
Kenneth A. Gross
Associate General Counsel

Date

January 3, 1985

FOR THE RESPONDENT:

Mitchell J. Notis
Mitchell J. Notis
Deputy General Counsel
Counsel for Respondents
1325 Mass. Ave., N.W.
Washington, D.C. 20005
(202) 737-8700, Ext. 311.

Date

11/16/84

85040514662



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 12, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD
SENIOR COMPLIANCE ANALYST
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1645: AMERICAN FEDERATION OF GOVERNMENT
EMPLOYEES PAC (AFGE PAC)

Please review the attached Request for Additional Information which is to be sent to the AFGE PAC for the 1984 12 Day Pre-General 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 12:00 noon on Friday, December 14, 1984. Thank you.

COMMENTS:

Attachment

85040514653



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

James H. Lynch Jr., Treasurer
American Federation of Government
Employee's Political Action
Committee
1325 Massachusetts Avenue
Washington, DC 20005

Identification Number: C00009936

Reference: 12 Day Pre-General Report (10/1/84-10/20/84)

Dear Mr. Lynch:

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:

-According to 11 CFR 104.3(b)(3)(B), the terms "voter registration" and "get-out-the-vote" are not adequate to describe the purpose of expenditures. Please provide a statement or description which clarifies such expenditures. In addition, if any of the voter registration or get-out-the-vote activities referenced House or Senate candidates, they should be allocated accordingly, unless merely incidental to the overall activity. If a portion or all of these expenditures were made on behalf of Federal candidates, they should be reported on Schedule B or E for Line 21 or 22 of the Detailed Summary Page, as appropriate.

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,

Alva E. Smith
Reports Analyst
Reports Analysis Division

8504051466A



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 5, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *AW*
SENIOR COMPLIANCE ANALYST
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1645: AMERICAN FEDERATION OF GOVERNMENT
EMPLOYEES' POLITICAL ACTION COMMITTEE (AFGE PAC)

Please review the attached Request for Additional Information which is to be sent to the AFGE PAC for the 1984 October 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 12:00 noon on Friday, December 7, 1984. Thank you.

COMMENTS:

Attachment

85040514665



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

James H. Lynch Jr., Treasurer
American Federation of Government
Employees' Political Action
Committee
1325 Massachusetts Avenue
Washington, DC 20005

Identification Number: C00009936

Reference: October Monthly Report (9/1/84-9/30/84)

Dear Mr. Lynch:

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:

-According to 11 CFR 104.3(b)(3)(B), the terms "voter registration" and "get-out-the-vote" are not adequate to describe the purpose of expenditures. Please provide a statement or description which clarifies such expenditures. In addition, if any of the voter registration or get-out-the-vote activities referenced House or Senate candidates, they should be allocated accordingly, unless merely incidental to the overall activity. If a portion or all of these expenditures were made on behalf of Federal candidates, they should be reported on Schedule B or E for Line 21 or 22 of the Detailed Summary Page, as appropriate.

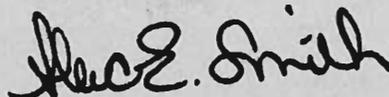
-2 U.S.C. §434(b)(6)(B)(iii) requires that the supporting schedule for disclosing independent expenditures be signed by the treasurer and certified by a notary public. This is to attest to the fact that the expenditures were not made in cooperation, consultation, or consent with, or at the request or suggestion of any candidate, or any authorized committee or agent of such committee. Please amend Schedule E accordingly.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission

85040514666

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,



Alva E. Smith
Reports Analyst
Reports Analysis Division

85040514667



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 3, 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *SW*
SENIOR COMPLIANCE ANALYST
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1645: AMERICAN FEDERATION OF GOVERNMENT
EMPLOYEES' PAC (AFGE PAC)

Please review the attached Request for Additional Information which is to be sent to the AFGE PAC for the 1984 November 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 12:00 noon on Monday, January 7, 1985. Thank you.

COMMENTS:

Attachment

85040514668



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

James H. Lynch Jr., Treasurer
American Federation of Government
Employee's Political Action Committee
1325 Massachusetts Avenue
Washington, DC 20005

Identification Number: C00009936

Reference: November Monthly Report (10/21/84-10/31/84)

Dear Mr. Lynch:

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:

-According to 11 CFR 104.3(b)(3)(B), the terms "voter registration" and "get-out-the-vote" are not adequate to describe the purpose of expenditures. Please provide a statement or description which clarifies such expenditures. In addition, if any of the voter registration or get-out-the-vote activities referenced House or Senate candidates, they should be allocated accordingly, unless merely incidental to the overall activity. If a portion or all of these expenditures were made on behalf of Federal candidates, they should be reported on Schedule B or E for Line 21 or 22 of the Detailed Summary Page, as appropriate.

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,

Alva E. Smith
Reports Analyst
Reports Analysis Division

85040514669



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 12, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *AD*
SENIOR COMPLIANCE ANALYST
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1645: AMERICAN FEDERATION OF GOVERNMENT
EMPLOYEES PAC (AFGE PAC)

Please review the attached Request for Additional Information which is to be sent to the AFGE PAC for the 1984 12 Day Pre-General 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 12:00 noon on Friday, December 14, 1984. Thank you.

COMMENTS:

OK
AD
12/12/84

Attachment

85040514670



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

James H. Lynch Jr., Treasurer
American Federation of Government
Employee's Political Action
Committee
1325 Massachusetts Avenue
Washington, DC 20005

Identification Number: C00009936

Reference: 12 Day Pre-General Report (10/1/84-10/20/84)

Dear Mr. Lynch:

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:

-According to 11 CFR 104.3(b)(3)(B), the terms "voter registration" and "get-out-the-vote" are not adequate to describe the purpose of expenditures. Please provide a statement or description which clarifies such expenditures. In addition, if any of the voter registration or get-out-the-vote activities referenced House or Senate candidates, they should be allocated accordingly, unless merely incidental to the overall activity. If a portion or all of these expenditures were made on behalf of Federal candidates, they should be reported on Schedule B or E for Line 21 or 22 of the Detailed Summary Page, as appropriate.

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,

Alva E. Smith
Reports Analyst
Reports Analysis Division

85040514671



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 5, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *AW*
SENIOR COMPLIANCE ANALYST
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1645: AMERICAN FEDERATION OF GOVERNMENT
EMPLOYEES' POLITICAL ACTION COMMITTEE (AFGE PAC)

Please review the attached Request for Additional Information which is to be sent to the AFGE PAC for the 1984 October 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 12:00 noon on Friday, December 7, 1984. Thank you.

COMMENTS:

OK
12/7/84

Attachment

85040514672



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

James H. Lynch Jr., Treasurer
American Federation of Government
Employees' Political Action
Committee
1325 Massachusetts Avenue
Washington, DC 20005

Identification Number: C00009936

Reference: October Monthly Report (9/1/84-9/30/84)

Dear Mr. Lynch:

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:

-According to 11 CFR 104.3(b)(3)(B), the terms "voter registration" and "get-out-the-vote" are not adequate to describe the purpose of expenditures. Please provide a statement or description which clarifies such expenditures. In addition, if any of the voter registration or get-out-the-vote activities referenced House or Senate candidates, they should be allocated accordingly, unless merely incidental to the overall activity. If a portion or all of these expenditures were made on behalf of Federal candidates, they should be reported on Schedule B or E for Line 21 or 22 of the Detailed Summary Page, as appropriate.

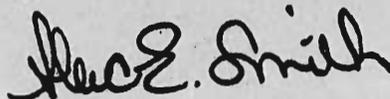
-2 U.S.C. §434(b)(6)(B)(iii) requires that the supporting schedule for disclosing independent expenditures be signed by the treasurer and certified by a notary public. This is to attest to the fact that the expenditures were not made in cooperation, consultation, or consent with, or at the request or suggestion of any candidate, or any authorized committee or agent of such committee. Please amend Schedule E accordingly.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission

85040514673

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,



Alva E. Smith
Reports Analyst
Reports Analysis Division

85040514674



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 17, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *SW*
SENIOR COMPLIANCE ANALYST
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1645 - COMMITTEE TO RE-ELECT CONGRESSMAN
WILLIAM D. FORD

Please review the attached Request for Additional Information which is to be sent to the Committee to Re-Elect Congressman William D. Ford for the 1984 Amended April Quarterly and July Quarterly 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 10:00 a.m. on Tuesday, August 21, 1984. Thank you.

COMMENTS:

OK
GD 8/20/84

Attachment

85040514675



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 17, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *SW*
SENIOR COMPLIANCE ANALYST
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1645 - COMMITTEE TO RE-ELECT CONGRESSMAN
WILLIAM D. FORD

Please review the attached Request for Additional Information which is to be sent to the Committee to Re-Elect Congressman William D. Ford for the 1984 Amended April Quarterly and July Quarterly 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 10:00 a.m. on Tuesday, August 21, 1984. Thank you.

COMMENTS:

85040514676

Attachment



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Theodore Monolidis, Treasurer
Committee to Re-Elect
Congressman William D. Ford
3476 City National Bank Building
Detroit, MI 48226

Identification Number: C00002063

Reference: April Quarterly Amendment (1/1/84-3/31/84) and July
Quarterly (4/1/84-6/30/84) Reports

Dear Mr. Monolidis:

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:

-You must provide the occupation and name of employer for each contributor required to be itemized on Schedule A. Please amend your report by supplying the omitted information.

With respect to the occupation and name of employer of the contributor, your committee may demonstrate "best efforts" to obtain the required information. This demonstration should describe your committee's procedures for requesting the information. You may also supply a copy of the solicitation and a statement that all solicitations request the required information. See 11 CFR 104.3(a)(4)(i) and 11 CFR 104.7.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 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,

Gregory Swanson
Reports Analyst
Reports Analysis Division

85040514677



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 15, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *SW*
SENIOR COMPLIANCE ANALYST
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1645 - AMERICAN FEDERATION OF GOVERNMENT
EMPLOYEES' POLITICAL ACTION COMMITTEE (AFGE PAC)

Please review the attached Requests for Additional Information which are to be sent to the AFGE PAC for the 1984 June Monthly Amendment and July Monthly Reports. If no response or an inadequate response are received for either RFAI, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 10:00 a.m. on Friday, August 17, 1984. Thank you.

COMMENTS:

OK
GD
8/17/84

85040514678

Attachment



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 15, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD
SENIOR COMPLIANCE ANALYST
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1645 - AMERICAN FEDERATION OF GOVERNMENT
EMPLOYEES' POLITICAL ACTION COMMITTEE (AFGE PAC)

Please review the attached Requests for Additional Information which are to be sent to the AFGE PAC for the 1984 June Monthly Amendment and July Monthly Reports. If no response or an inadequate response are received for either RFAI, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 10:00 a.m. on Friday, August 17, 1984. Thank you.

COMMENTS:

Attachment

85040514679



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

James H. Lynch Jr., Treasurer
American Federation of Government
Employees' Political Action
Committee
1325 Massachusetts Avenue
Washington, DC 20005

Identification Number: C00009936

Reference: June Monthly Amendment Report (5/1/84-5/31/84)

Dear Mr. Lynch:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 22 of the Detailed Summary Page of your original June Monthly report discloses a total of \$3,436.05 in independent expenditures. The sum of the entries itemized on Schedule E of your amended June Monthly report, however, indicates the total to be \$23,741.66. Please amend your report to clarify the 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,

Alva E. Smith
Reports Analyst
Reports Analysis Division

85040514680



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

James H. Lynch Jr., Treasurer
American Federation of Government
Employees' Political Action
Committee
1325 Massachusetts Avenue
Washington, DC 20005

Identification Number: C00009936

Reference: July Monthly Report (6/1/84-6/30/84)

Dear Mr. Lynch:

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:

-Please provide a Schedule E to support the entry of \$20,305.60 reported on Line 22 of the Detailed Summary Page. Each independent expenditure made by your committee, which aggregates in excess of \$200 in a calendar year to a payee, must be itemized on Schedule E. Additionally, Schedule E must be notarized. 2 U.S.C. §434(b)(6)(B)(iii) and 11 CFR 104.3(b)(3)(vii)(B).

If this financial activity was already disclosed on your previous report, please amend this report by including only the financial transactions that occurred between June 1, 1984 and June 30, 1984.

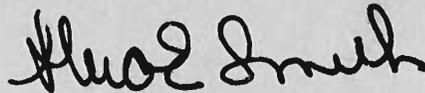
-Line 21 of the Detailed Summary Page of your report discloses a total of \$15,000 in contributions to Federal Candidates and other political committees. The sum of the entries itemized on Schedule B, however, indicates the total to be \$14,750. Please amend your report to clarify the discrepancy.

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

85040514681

assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Alva E. Smith
Reports Analyst
Reports Analysis Division

85040514692



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 3, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTN: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *SW*
COMPLIANCE BRANCH, RAD

SUBJECT: MUR 1645 - AMERICAN FEDERATION OF STATE, COUNTY AND
MUNICIPAL EMPLOYEES P.E.O.P.L.E. QUALIFIED (AFSCME
P.E.O.P.L.E. QUALIFIED)

Please review the attached Requests for Additional Information (RFAIs) which are to be sent to AFSCME P.E.O.P.L.E. Qualified for the 1984 February and March Monthly Reports. If no response or an inadequate response is received for either RFAI, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by noon on Friday, July 6th. Thank you.

COMMENTS:

Comte is not part of MUR.

*GD
7/5/84*

Attachments

85040514683



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

William Lucy, Treasurer
American Federation of State
County and Municipal Employees
P.E.O.P.L.E. Qualified
525 L Street, NW
Washington, DC 20036

Identification Number: C00011114

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

Dear Mr. Lucy:

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:

- 1 - Please provide a Schedule A to support the entry on Line 12 of the Detailed Summary Page. All transfers from affiliates received by your committee must be itemized on Schedule A, regardless of the amount. (2 U.S.C. 434(b)(3)(D))

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,

Mike Tangney
Reports Analyst
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

William Lucy, Treasurer
American Federation of State
County and Municipal Employees
P.E.O.P.L.E. Qualified
1625 L Street, NW
Washington, DC 20036

Identification Number: C00011114

Reference: March Monthly Report (2/1/84-2/29/84)

Dear Mr. Lucy:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 CFR 104.3(a)(2))

-The calculations for Schedule B supporting Line 21 appear to be incorrect. FEC calculations disclose the amount of contributions to be \$69,025. Please amend this and any other reports that require corrected totals.

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,

Mike Tangney
Reports Analyst
Reports Analysis Division

85040514685



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 3, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTN: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *SW*
COMPLIANCE BRANCH, RAD

SUBJECT: MUR 1645 - AMERICAN FEDERATION OF STATE, COUNTY AND
MUNICIPAL EMPLOYEES P.E.O.P.L.E. QUALIFIED (AFSCME
P.E.O.P.L.E. QUALIFIED)

Please review the attached Requests for Additional Information (RFAIs) which are to be sent to AFSCME P.E.O.P.L.E. Qualified for the 1984 February and March Monthly Reports. If no response or an inadequate response is received for either RFAI, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by noon on Friday, July 6th. Thank you.

COMMENTS:

Attachments

85040514686



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

William Lucy, Treasurer
American Federation of State
County and Municipal Employees
P.E.O.P.L.E. Qualified
1625 L Street, NW
Washington, DC 20036

Identification Number: C00011114

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

Dear Mr. Lucy:

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:

-Please provide a Schedule A to support the entry on Line 12 of the Detailed Summary Page. All transfers from affiliates received by your committee must be itemized on Schedule A, regardless of the amount. (2 U.S.C. 434(b)(3)(D))

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,

Mike Tangney
Reports Analyst
Reports Analysis Division

85040514687



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

William Lucy, Treasurer
American Federation of State
County and Municipal Employees
P.E.O.P.L.E. Qualified
1625 L Street, NW
Washington, DC 20036

Identification Number: C00011114

Reference: March Monthly Report (2/1/84-2/29/84)

Dear Mr. Lucy:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. (11 CFR 104.3(a)(2))

-The calculations for Schedule B supporting Line 21 appear to be incorrect. FEC calculations disclose the amount of contributions to be \$69,025. Please amend this and any other reports that require corrected totals.

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,

Mike Tangney
Reports Analyst
Reports Analysis Division

85040514688



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 4, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTN: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *SW*
COMPLIANCE BRANCH, RAD

SUBJECT: MUR 1645 - AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES
POLITICAL ACTION COMMITTEE (AFGE PAC)

Please review the attached Request for Additional Information (RAI) which is to be sent to AFGE PAC for the 1984 April 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 the close of business on Wednesday, June 6th. Thank you.

COMMENTS:

OK

GD
6/6/84

Attachment

85040514689



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

James H. Lynch Jr., Treasurer
American Federation of Government
Employees Political Action
Committee
1325 Massachusetts Avenue, NW
Washington, DC 20005

Identification Number: C00009936

Reference: April Monthly Report (3/1/84-3/31/84)

Dear Mr. Lynch:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The beginning cash balance of this report should equal the ending balance of your March Monthly report. Please clarify this discrepancy and amend any subsequent report(s) which may be affected by this correction.

-Your calculations for Line 21 appear to be incorrect. FEC calculations disclose this amount to be \$37,620. Please provide the omitted or corrected total(s) on the Summary and Detailed Summary Pages. (11 CFR 104.3)

-Schedule B of your report discloses a \$5,000 transfer to the Eleanor Roosevelt Fund. Please clarify the nature of this transfer. For future reporting, please provide the full mailing address for each transfer.

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, .

Alva E. Smith
Reports Analyst
Reports Analysis Division

85040514690



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 4, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTN: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *SW*
COMPLIANCE BRANCH, RAD

SUBJECT: MUR 1645 - AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES
POLITICAL ACTION COMMITTEE (AFGE PAC)

Please review the attached Request for Additional Information (RAI) which is to be sent to AFGE PAC for the 1984 April 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 the close of business on Wednesday, June 6th.
Thank you.

COMMENTS:

Attachment

85040514691



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

James H. Lynch Jr., Treasurer
American Federation of Government
Employees Political Action
Committee
1325 Massachusetts Avenue, NW
Washington, DC 20005

Identification Number: C00009936

Reference: April Monthly Report (3/1/84-3/31/84)

Dear Mr. Lynch:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The beginning cash balance of this report should equal the ending balance of your March Monthly report. Please clarify this discrepancy and amend any subsequent report(s) which may be affected by this correction.

-Your calculations for Line 21 appear to be incorrect. FEC calculations disclose this amount to be \$37,620. Please provide the omitted or corrected total(s) on the Summary and Detailed Summary Pages. (11 CFR 104.3)

-Schedule B of your report discloses a \$5,000 transfer to the Eleanor Roosevelt Fund. Please clarify the nature of this transfer. For future reporting, please provide the full mailing address for each transfer.

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, .

Alva E. Smith
Reports Analyst
Reports Analysis Division

85040514692



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 24, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTN: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *HW*
COMPLIANCE BRANCH, RAD

SUBJECT: MUR 1645 - AMERICAN FEDERATION OF GOVERNMENT EMPLOYEE'S
POLITICAL ACTION COMMITTEE (AFGE PAC)

Please review the attached Informational Notice (IN) which is to be sent to AFGE PAC for the 1984 March Monthly Report. Any comments which you may have should be forwarded to RAD by the close of business on Tuesday, May 29th. Thank you.

COMMENTS:

Typo in address. Should read "Employees"

GD 5/25/84

Attachment

85040514693



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 24, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTN: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *HW*
COMPLIANCE BRANCH, RAD

SUBJECT: MUR 1645 - AMERICAN FEDERATION OF GOVERNMENT EMPLOYEE'S
POLITICAL ACTION COMMITTEE (AFGE PAC)

Please review the attached Informational Notice (IN) which is to be sent to AFGE PAC for the 1984 March Monthly Report. Any comments which you may have should be forwarded to RAD by the close of business on Tuesday, May 29th. Thank you.

COMMENTS:

Attachment

85040514694



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

James H. Lynch Jr., Treasurer
American Federation of Government
Employee's Political Action
Committee
1325 Massachusetts Avenue
Washington, DC 20005

Identification Number: C00009936

Reference: March Monthly Report (2/1/84-2/29/84)

Dear Mr. Lynch:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The beginning cash balance of this report should equal the ending balance of your February Monthly Amended report. Please clarify this discrepancy and amend any subsequent report(s) which may be affected by this correction.

Any amendment or clarification should be filed with the Federal Election Commission. 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,

Alva E. Smith
Reports Analyst
Reports Analysis Division

85040514695



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 24, 1984

Clifton Peter Rose, Esquire
Williams & Jensen
1101 Connecticut Avenue, N.W.
Washington, D.C. 20036

RE: MUR 1645
Congressman William D. Ford;
Committee to Re-elect
Congressman William D. Ford
and its treasurer,
Theodore Monolidis

Dear Mr. Rose:

The Federal Election Commission notified your clients on March 23, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your clients' explanation of this matter which was dated April 16, 1984.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on May 21, 1984, determined that there is reason to believe that the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Act. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

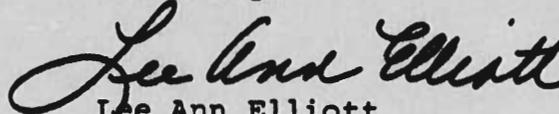
The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your clients, the Office of General must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

85040514696

Clifton Peter Rose, Esquire
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosures
Procedures

85040514697



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Clifton Peter Rose, Esquire
Williams & Jensen
1101 Connecticut Avenue, N.W.
Washington, D.C. 20036

RE: MUR 1645
Congressman William D. Ford;
Committee to Re-elect
Congressman William D. Ford
and its treasurer,
Theodore Monolidis

Dear Mr. Rose:

The Federal Election Commission notified your clients on March 23, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your clients' explanation of this matter which was dated April 16, 1984.

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The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your clients, the Office of General must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

85040514693

Clifton Peter Rose, Esquire
Page 2

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Sincerely,

Enclosures
Procedures

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 24, 1984

Mitchell J. Notis, Esquire
Acting Deputy General Counsel
American Federation of Government Employees
1325 Massachusetts Avenue, N.W.
Washington, D.C. 20005

RE: MUR 1645
American Federation of
Government Employees Political
Action Committee;
James Lynch, Jr., Treasurer

Dear Mr. Notis:

The Federal Election Commission notified your clients on March 23, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your clients' explanation of this matter which was dated April 25, 1984.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on May 21, 1984, determined that there is reason to believe that the American Federation of Government Employees Political Action Committee and James Lynch, Jr., as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

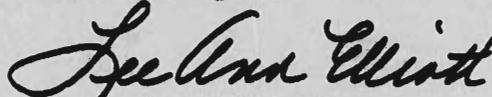
The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your clients, the Office of General must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

85040514700

Mitchell J. Notis, Esquire
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosures
Procedures

85040514701



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mitchell J. Notis, Esquire
Acting Deputy General Counsel
American Federation of Government Employees
1325 Massachusetts Avenue, N.W.
Washington, D.C. 20005

RE: MUR 1645
American Federation of
Government Employees Political
Action Committee;
James Lynch, Jr., Treasurer

Dear Mr. Notis:

The Federal Election Commission notified your clients on March 23, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your clients' explanation of this matter which was dated April 25, 1984.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on , 1984, determined that there is reason to believe that the American Federation of Government Employees Political Action Committee and James Lynch, Jr., as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your clients, the Office of General must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

85040514702

Mitchell J. Notis, Esquire
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures
Procedures.

85040514703



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 24, 1984

J.D. Gleason, Treasurer
American Federation of Government
Employees' Committee on Federal Employee
Political Education
1325 Massachusetts Avenue, N.W.
Washington, D.C. 20005

RE: MUR 1645

Dear Mr. Gleason:

The Federal Election Commission notified the American Federation of Government Employees' Committee on Federal Employee Political Education ("AFGE's COFEPE") and you, as treasurer, on March 23, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on May 21, 1984, determined that there is reason to believe that AFGE's COFEPE and you, as treasurer, have violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, it appears that AFGE's COFEPE made an excessive contribution to the Committee to Re-elect Congressman William D. Ford during the 1982 Michigan primary election.

As of this date, we have received no response from you in connection with this matter.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against the committee and you, as treasurer, the Office of General must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

85040514704

J.D. Gleason, Treasurer
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,


Lee Ann Elliott
Chairman

Enclosures
Procedures

85040514705



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

J.D. Gleason, Treasurer
American Federation of Government
Employees' Committee on Federal Employee
Political Education
1325 Massachusetts Avenue, N.W.
Washington, D.C. 20005

RE: MUR 1645

Dear Mr. Gleason:

The Federal Election Commission notified the American Federation of Government Employees' Committee on Federal Employee Political Education ("AFGE's COFEPE") and you, as treasurer, on March 23, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on [redacted], 1984, determined that there is reason to believe that AFGE's COFEPE and you, as treasurer, have violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, it appears that AFGE's COFEPE made an excessive contribution to the Committee to Re-elect Congressman William D. Ford during the 1982 Michigan primary election.

As of this date, we have received no response from you in connection with this matter.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against the committee and you, as treasurer, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

85040514706

J.D. Gleason, Treasurer
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures
Procedures

85040514707

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1645
William D. Ford)
Committee to Re-elect Congressman)
William D. Ford and its treasurer,)
Theodore Monolidis, et. al.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 21, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1645:

1. Find reason to believe that the American Federation of Government Employees' Committee on Federal Employee Political Education and its treasurer, J.D. Gleason, violated 2 U.S.C. § 441a(a)(2)(A).
2. Find reason to believe that the American Federation of Government Employees' Political Action Committee and its treasurer, James H. Lynch, Jr., violated 2 U.S.C. § 441a(a)(2)(A).
3. Find reason to believe that the Committee to Re-elect Congressman William D. Ford and its treasurer, Theodore Monolidis, violated 2 U.S.C. § 441a(f).

(Continued)

8 5 0 4 0 5 1 4 7 0 9

Certification
MUR 1645
First General Counsel's Report
Dated May 17, 1984

Page 2

4. Approve the letters as attached to the First General Counsel's Report dated May 17, 1984.

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

Attest:

5/22/84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

85040514709

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

5-17-84, 9:42
5-17-84, 4:00

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1645
William D. Ford)
Committee to Re-elect Congressman)
William D. Ford and its treasurer,)
Theodore Monolidis, et. al.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 21, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1645:

1. Find reason to believe that the American Federation of Government Employees' Committee on Federal Employee Political Education and its treasurer, J.D. Gleason, violated 2 U.S.C. § 441a(a)(2)(A).
2. Find reason to believe that the American Federation of Government Employees' Political Action Committee and its treasurer, James H. Lynch, Jr., violated 2 U.S.C. § 441a(a)(2)(A).
3. Find reason to believe that the Committee to Re-elect Congressman William D. Ford and its treasurer, Theodore Monolidis, violated 2 U.S.C. § 441a(f).

(Continued)

85040514710

Certification
MUR 1645

Page 2

First General Counsel's Report
Dated May 17, 1984

4. Approve the letters as attached to the First General Counsel's Report dated May 17, 1984.

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

Attest:

5/22/84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

85040514711

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

5-17-84, 9:42
5-17-84, 4:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
 FROM: Office of General Counsel *CJ*
 DATE: May 17, 1984
 SUBJECT: MUR 1645 - First General Counsel's Report

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

85040514712

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)

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

5/17/84-9:45

MUR # 164584 MAY 17 A 9: 42
DATE COMPLAINT RECEIVED
BY OGC 3/16/84
DATE OF NOTIFICATION TO
RESPONDENT 3/23/84
STAFF MEMBER
GEORGE DEMOUGEOT

COMPLAINANT'S NAME: James Edward Antosh

RESPONDENTS' NAME: William D. Ford
Committee to Re-elect Congressman
William D. Ford and its treasurer,
Theodore Monolidis
American Federation of Government
Employees' Committee on Federal
Employee Political Education and its
treasurer, J.D. Gleason
American Federation of Government
Employees' Political Action Committee
and its treasurer, James H. Lynch, Jr.

SENSITIVE

RELEVANT STATUTE: 2 U.S.C. § 441a(a)(2)(A)
2 U.S.C. § 441a(f)
11 C.F.R. § 104.14(d)
11 C.F.R. § 110.1(a)(2)(ii)(A)

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

FACTUAL AND LEGAL ANALYSIS

Complainant alleges that the American Federation of Government Employees' Committee on Federal Employee Political Education ("AFGE's COFEPE") and the American Federation of Government Employees' Political Action Committee ("AFGE's PAC") violated 2 U.S.C. § 441a(a)(2)(A) by making excessive contributions to the Committee to Re-elect Congressman William D. Ford during the 1982 Michigan primary election. Complainant further alleges that Congressman William D. Ford, the Committee

85040514713

to Re-elect Congressman William D. Ford ("the Ford Committee") and its treasurer violated 2 U.S.C. § 441a(f) for receipt of contributions in excess of limitations at 2 U.S.C. §441a(a)(2)(A) from AFGE's COFEPE and AFGE's PAC. Those contributions were made in the following manner:

<u>Date Received</u>	<u>Amount</u>	<u>Contributor</u>
6/25/81	\$2,500	AFGEs' COFEPE
3/18/82	\$ 625	AFGEs' PAC
6/22/82	<u>\$2,500</u>	AFGEs' PAC
Total =	\$5,625	

85040514714
Complainant states that FEC reports show that AFGE's COFEPE and AFGE's PAC failed to designate whether the contributions were intended for the primary or general election. Since the contributions were made well in advance of the August 3, 1982, primary election, the complainant contends that the contributions were attributable to the primary election. 11 C.F.R. § 110.1(a)(2)(ii)(A).

Counsel for the respondents all counter that the excessive contribution was unintentional and due to an inadvertent error in not checking off the appropriate box on the Schedule B. Neither the primary or general election designation box was checked by the Ford Committee when it reported receipt of the June 25, 1981, \$2,500 contribution. The Ford Committee checked the primary box designation when reporting the March 18, 1982, \$625 contribution and the June 22, 1982, \$2,500 contribution. Neither AFGE's COFEPE nor AFGE's PAC deny that they are affiliated political

committees pursuant to 2 U.S.C. § 441a(a)(5). Upon notification of the complaint, the treasurer for the Ford Committee refunded the \$625 in question to AFGE's PAC.

Inasmuch as the contributions were not designated for a particular election by AFGE's COFEPE or by AFGE's PAC, but were made prior to the primary election they are attributable to the primary election. Accordingly, it is recommended that the Commission find reason to believe that AFGE's COFEPE and AFGE's PAC violated 2 U.S.C. § 441a(a)(2)(A) and that the Ford Committee violated 2 U.S.C. § 441a(f).

RECOMMENDATIONS

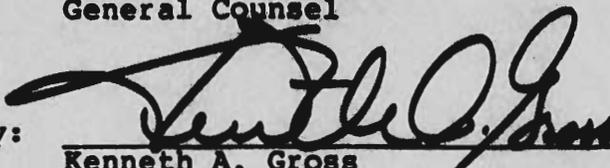
1. Find reason to believe that the American Federation of Government Employees' Committee on Federal Employee Political Education and its treasurer, J.D. Gleason, violated 2 U.S.C. § 441a(a)(2)(A).
2. Find reason to believe that the American Federation of Government Employees' Political Action Committee and its treasurer, James H. Lynch, Jr., violated 2 U.S.C. § 441a(a)(2)(A).
3. Find reason to believe that the Committee to Re-elect Congressman William D. Ford and its treasurer, Theodore Monolidis, violated 2 U.S.C. § 441a(f).

85040514713

4. Approve the attached letters.

May 16, 1984
Date

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

Attachments

- I. Proposed letters (3)
- II. Response to complaint from AFGE's PAC
- III. Response to complaint from the Committee to Re-elect William D. Ford
- IV. Response to complaint from Congressman William D. Ford

85040514716



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Clifton Peter Rose, Esquire
Williams & Jensen
1101 Connecticut Avenue, N.W.
Washington, D.C. 20036

RE: MUR 1645
Congressman William D. Ford;
Committee to Re-elect
Congressman William D. Ford
and its treasurer,
Theodore Monolidis

Dear Mr. Rose:

The Federal Election Commission notified your clients on March 23, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your clients' explanation of this matter which was dated April 16, 1984.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on , 1984, determined that there is reason to believe that the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Act. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your clients, the Office of General must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

Attachment I
Page 1

85040514717

Clifton Peter Rose, Esquire
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures
Procedures

85040514718

Attachment I
Page 2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

J.D. Gleason, Treasurer
American Federation of Government
Employees' Committee on Federal Employee
Political Education
1325 Massachusetts Avenue, N.W.
Washington, D.C. 20005

RE: MUR 1645

Dear Mr. Gleason:

The Federal Election Commission notified the American Federation of Government Employees' Committee on Federal Employee Political Education ("AFGE's COFEPE") and you, as treasurer, on March 23, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on [redacted], 1984, determined that there is reason to believe that AFGE's COFEPE and you, as treasurer, have violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, it appears that AFGE's COFEPE made an excessive contribution to the Committee to Re-elect Congressman William D. Ford during the 1982 Michigan primary election.

As of this date, we have received no response from you in connection with this matter.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against the committee and you, as treasurer, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

Attachment I
Page 3

85040514719

J.D. Gleason, Treasurer
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures
Procedures

85040514720

Attachment I
Page 4



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mitchell J. Notis, Esquire
Acting Deputy General Counsel
American Federation of Government Employees
1325 Massachusetts Avenue, N.W.
Washington, D.C. 20005

RE: MUR 1645
American Federation of
Government Employees Political
Action Committee;
James Lynch, Jr., Treasurer

Dear Mr. Notis:

The Federal Election Commission notified your clients on March 23, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your clients' explanation of this matter which was dated April 25, 1984.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on , 1984, determined that there is reason to believe that the American Federation of Government Employees Political Action Committee and James Lynch, Jr., as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your clients, the Office of General must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

Attachment I
Page 5

85040514721

Mitchell J. Notis, Esquire
Page 2

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures
Procedures

85040514722

Attachment I
Page 6



AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES

AFFILIATED WITH THE AFL-CIO

KENNETH T. BLAYLOCK
NATIONAL PRESIDENT

JOHN N. STURDIVANT
EXECUTIVE VICE PRESIDENT

NICHOLAS J. NOLAN
NATIONAL SEC. TREAS.



1325 MASSACHUSETTS AVE., N.W. WASHINGTON, D. C. 20005
Telephone: (202) 737-8700

IN REPLY PLEASE REFER TO:

8n/PAC

April 25, 1984

*MUR 1645
Demougeot*

George Demougeot, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1645

Dear Mr. Demougeot:

This response is submitted on behalf of the American Federation of Government Employees - PAC [AFGE-PAC], and James H. Lynch, Jr., the Treasurer of AFGE-PAC, respondents in the above referenced MUR. The MUR alleges that AFGE-PAC contributed \$625 above the limits set in 11 CFR Section 110.2, to the election committee of Congressman William Ford.

As you know, the AFGE-PAC is entitled to contribute, to committees such as the Ford Committee, \$10,000 per election cycle (\$5,000 for a primary election and \$5,000 for a general election). 11 CFR Section 110.2. If these limitations were violated at all in this case, the technical violation is due solely to the failure of AFGE-PAC to check the correct box on the Schedule B submitted in relation to the Ford contributions.

The following contributions were made in relation to Congressman Ford's reelection in the 1981-1982 election cycle:

- (1) 6/15/81 - \$2,500
- (2) 3/10/82 - \$ 625
- (3) 4/8/82 - \$2,500.

Although the total is greater than \$5,000, it is substantially less than the \$10,000 limitation set for the general election cycle.

*Attachment II
Page 7*

85040514723

George Demougeot, Esquire
April 25, 1984
Page Two

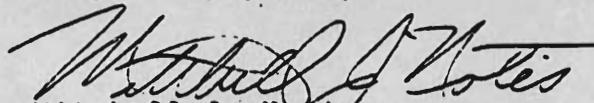
25 P1:49

Due to apparent inadvertant error none of the boxes on Schedule B indicating which election these contributions were for (primary or general election) were checked off. If AFGE-PAC had simply checked the correct box on Schedule B, indicating its intention to divide the contributions between the primary and general elections, this matter would not have arisen. As I have stated, this technical violation was unintentional, and, we claim, de minimis.

I would also note that even though none of the respondents in this matter believe that any violation has occurred, the Ford Committee has chosen to refund to AFGE-PAC the amount alleged to be in excess of legal contribution limits. A copy of this letter and check is enclosed.

For all of the foresaid reasons, respondents AFGE-PAC and James Lynch, Jr. urge you to dismiss the pending Complaint.

Very truly yours,


Mitchell J. Notis
Acting Deputy General Counsel

85040514724

Attachment II
Page 8

Committee to Re-Elect
CONGRESSMAN WILLIAM D. FORD

659-8201

Lawyer

3476 CITY NATIONAL BANK BUILDING / DETROIT, MICHIGAN 48226

Telephone: 961-5870



THEODORE MONOLIDIS
TREASURER

APR 25 11:49

April 2, 1984

RECEIVED
FORD

American Federation of Government
Employees-PAC
1325 Massachusetts Ave., N.W., #703
Washington, D.C. 20005

Gentlemen:

We have received notice from the Federal Election Commission that your contribution to this Committee, in the sum of \$2,500.00 received on June 22, 1982, was in excess of the allowable legal limitation.

Accordingly, there is enclosed our remittance, in the sum of \$625.00, representing reimbursement of the excess funds received.

Very truly yours,

Theodore Monolidis
THEODORE MONOLIDIS
Treasurer

85040514725

COMMITTEE TO RE-ELECT
CONGRESSMAN WILLIAM D. FORD
3476 PENOBSCOT BLDG.
DETROIT, MICH. 48226

1753

April 2, 1984

74-207
724

PAY TO THE ORDER OF American Federation of Government Employees-PAC \$ 625.00

Six Hundred, Twenty-Five and 00/100-----DOLLARS



TAYLOR, MICHIGAN 48180

Attachment #
Page 9

For reimbursement of excess funds received in 1982

Theodore Monolidis

CONGRESSMAN WILLIAM D. FORD

34 APR 5 12:24

CC# 5038

3476 CITY NATIONAL BANK BUILDING / DETROIT, MICHIGAN 48226

Telephone: 981-5870



THEODORE MONOLIDIS
TREASURER

April 2, 1984

*MUR 1645
Democrat*

APR 5 1984
12:08

Federal Election Commission
Washington, D.C. 20463

Re: MUR 1645

Gentlemen:

This letter constitutes the response, of this Committee, to the above captioned Complaint filed with your office.

Prior to the filing of the Complaint we were unaware that more than the allowable amount had been received from the American Federation of Government Employees PAC. The Complaint correctly identifies the contributions received, resulting in the receipt of \$625.00 in excess of the allowable limit.

Reimbursement of the excess amount has been forwarded to said committee and a copy of our forwarding letter and check are attached hereto.

The acceptance of the excessive amount was not made knowingly or with any intent to violate the Federal Election Campaign Act of 1971, as amended, but was due through inadvertence.

The sum of \$2,500.00 received on 6/25/81 was entered in our records as COFEPE. The other two contributions dated 3/18/82 and 6/22/82, totalling \$3,125.00, were entered in our records as being received from AFGE-PAC. We were inadvertently recording these as separate organizations, but now realize that they are one and the same organization.

We believe that under the circumstances herein recited, and reimbursement having been made, that no further action should be taken against this Committee.

Respectfully submitted,

Theodore Monolidis
THEODORE MONOLIDIS
Treasurer

Attachment III

Page 10

Subscribed and sworn to before me
this 2nd day of April, 1984.

My Commission expires: 8-25-84

85040514726

CONGRESSMAN WILLIAM D. FORD

3476 CITY NATIONAL BANK BUILDING / DETROIT, MICHIGAN 48226

Telephone: 961-5870

THEODORE MONOLIDIS
TREASURER

April 2, 1984

American Federation of Government
Employees-PAC
1325 Massachusetts Ave., N.W., #703
Washington, D.C. 20005

Gentlemen:

We have received notice from the Federal Election Commission that your contribution to this Committee, in the sum of \$2,500.00 received on June 22, 1982, was in excess of the allowable legal limitation.

Accordingly, there is enclosed our remittance, in the sum of \$625.00, representing reimbursement of the excess funds received.

Very truly yours,

Theodore Monolidis
THEODORE MONOLIDIS
Treasurer

85040514727

COMMITTEE TO RE-ELECT
CONGRESSMAN WILLIAM D. FORD
3476 PENOBSCOT BLDG.
DETROIT, MICH. 48226

1753

April 2, 1984

74-207
724

PAY TO THE ORDER OF American Federation of Government Employees-PAC \$ 625.00

Six Hundred, Twenty-Five and 00/100-----DOLLARS



TAYLOR, MICHIGAN 48180

For reimbursement of excess funds received in 1982

Attachment III
Page 11

Theodore Monolidis

001753 10724070761

31085700

WILLIAMS & JENSEN
A PROFESSIONAL CORPORATION
LAWYERS

1101 CONNECTICUT AVENUE, N.W.
WASHINGTON, D. C. 20036

April 16, 1984

TELEPHONE
(202) 699-8801

PAUL ARNESON
GEORGE D. BAKER
WILLIAM T. BRACK
WILLIAM H. CABLE
PAUL T. CLARK
ANN S. COSTELLO
WINFIELD P. CRIGLER
JUNE E. EDMONDSON
JOHN P. FORD
ROBERT E. GLENNON
J. STEVEN HART
ROBERT E. JENSEN
JOHN J. MEMACKIN, JR.
GEORGE G. OLSEN
CLIFTON PETER ROSE
MARY LYNNE WHALEN
J. D. WILLIAMS

16 #4: 14

MUR 1645
Demougeot

George Demougeot, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: MUR 1645

Dear George:

I am submitting this response on behalf of Congressman William Ford, his campaign committee and treasurer. They have been named as Respondents in the above MUR.

While I cannot help but harbor a grudging admiration for the dogged thoroughness with which the attorneys for the Center on National Labor Policy have digested Congressman Ford's FEC reports, I cannot discern any violation of the Federal Election Campaign Act from their research. AFGE was entitled to contribute \$10,000 to Congressman Ford in the 1981-1982 election cycle. They contributed \$5625 in total. Their only failing was apparently not indicating in their FEC reports which amounts were intended for the primary election and which amounts were intended for the general. Moreover, the treasurer of Congressman Ford's principal campaign committee has, in perhaps a superabundance of caution, refunded \$625 to AFGE.

The Commission cannot predicate a finding of a violation on the mere failure to check a box on the Itemized Schedules of Contributions and Receipts in view of the unquestionable legality of the total amounts contributed. We respectfully urge that the Complaint be dismissed.

Sincerely,



Clifton Peter Rose

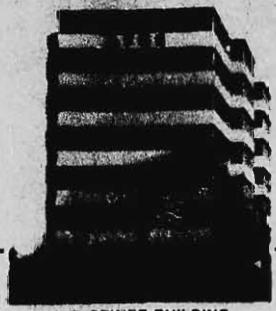
/cds

Attachment II

Page 12

85040514728

BCC # 2064



J. F. GRINER BUILDING

AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES

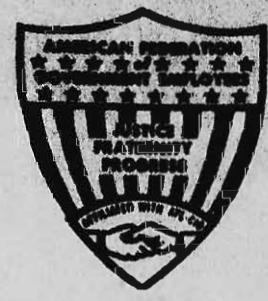
AFFILIATED WITH THE AFL-CIO

KENNETH T. BLAYLOCK
NATIONAL PRESIDENT

JOHN N. STURDIVANT
EXECUTIVE VICE PRESIDENT

NICHOLAS J. NOLAN
NATIONAL SEC. - TREAS.

1325 MASSACHUSETTS AVE., N.W. · WASHINGTON, D. C. 20005
Telephone: (202) 737-8700



IN REPLY PLEASE REFER TO:

8n/PAC

April 25, 1984

*MUR 1645
Demougeot*

George Demougeot, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1645

Dear Mr. Demougeot:

This response is submitted on behalf of the American Federation of Government Employees - PAC [AFGE-PAC], and James H. Lynch, Jr., the Treasurer of AFGE-PAC, respondents in the above referenced MUR. The MUR alleges that AFGE-PAC contributed \$625 above the limits set in 11 CFR Section 110.2, to the election committee of Congressman William Ford.

As you know, the AFGE-PAC is entitled to contribute, to committees such as the Ford Committee, \$10,000 per election cycle (\$5,000 for a primary election and \$5,000 for a general election). 11 CFR Section 110.2. If these limitations were violated at all in this case, the technical violation is due solely to the failure of AFGE-PAC to check the correct box on the Schedule B submitted in relation to the Ford contributions.

The following contributions were made in relation to Congressman Ford's reelection in the 1981-1982 election cycle:

- (1) 6/15/81 - \$2,500
- (2) 3/10/82 - \$ 625
- (3) 4/8/82 - \$2,500.

Although the total is greater than \$5,000, it is substantially less than the \$10,000 limitation set for the general election cycle.

85040514729

APR 25 1984
P 1:4

George Demougeot, Esquire
April 25, 1984
Page Two

CENTRAL COUNSEL

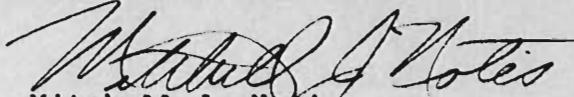
4 APR 25 P 1:49

Due to apparent inadvertant error none of the boxes on Schedule B indicating which election these contributions were for (primary or general election) were checked off. If AFGE-PAC had simply checked the correct box on Schedule B, indicating its intention to divide the contributions between the primary and general elections, this matter would not have arisen. As I have stated, this technical violation was unintentional, and, we claim, de minimis.

I would also note that even though none of the respondents in this matter believe that any violation has occurred, the Ford Committee has chosen to refund to AFGE-PAC the amount alleged to be in excess of legal contribution limits. A copy of this letter and check is enclosed.

For all of the foresaid reasons, respondents AFGE-PAC and James Lynch, Jr. urge you to dismiss the pending Complaint.

Very truly yours,


Mitchell J. Notis
Acting Deputy General Counsel

85040514730

Committee to Re-Elect

Peter Rose
659-8201
Lawyer

CONGRESSMAN WILLIAM D. FORD

3476 CITY NATIONAL BANK BUILDING / DETROIT, MICHIGAN 48226

Telephone: 861-6878

THEODORE MONOLIDIS
TREASURER

APR 25 11:49

April 2, 1984

RECEIVED
FORD

American Federation of Government
Employees-PAC
1325 Massachusetts Ave., N.W., #703
Washington, D.C. 20005

Gentlemen:

We have received notice from the Federal Election Commission that your contribution to this Committee, in the sum of \$2,500.00 received on June 22, 1982, was in excess of the allowable legal limitation.

Accordingly, there is enclosed our remittance, in the sum of \$625.00, representing reimbursement of the excess funds received.

Very truly yours,

Theodore Monolidis
THEODORE MONOLIDIS
Treasurer

85040514731

COMMITTEE TO RE-ELECT
CONGRESSMAN WILLIAM D. FORD
3476 PENOBSCOT BLDG.
DETROIT, MICH. 48226

1753

April 2, 1984

74-207
724

PAY TO THE ORDER OF American Federation of Government Employees-PAC \$ 625.00

Six Hundred, Twenty-Five and 00/100-----DOLLARS

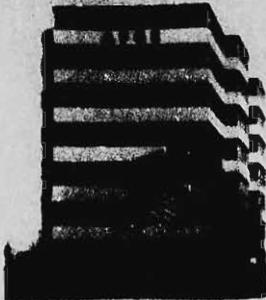


TAYLOR, MICHIGAN 48160

For reimbursement of excess funds received in 1982

Theodore Monolidis

⑆001753⑆ ⑆072402076⑆ 31⑆0857⑆0⑆



J. P. GRINER BUILDING

AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES

AFFILIATED WITH THE AFL-CIO

KENNETH T. BLAYLOCK
NATIONAL PRESIDENT

JOHN N. STURDIVANT
EXECUTIVE VICE PRESIDENT

NICHOLAS J. NOLAN
NATIONAL SEC.-TREAS.

1325 MASSACHUSETTS AVE., N.W. WASHINGTON, D. C. 20005
Telephone: (202) 737-8700



IN REPLY PLEASE REFER TO:

8n/PAC

April 25, 1984

George Demougeot, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1645

Dear Mr. Demougeot:

Although I have been authorized by James H. Lynch in his capacity as treasurer of AFGE-PAC to represent him and AFGE-PAC, respondents in the above referenced MUR, Mr. Lynch is presently out of the country and will not return for perhaps several weeks. As soon as he returns I will have him execute the "Statement of Designation of Counsel" which you have sent us.

If there is anyone else here at AFGE who could execute the designation or if you have a problem with our inability to reach Mr. Lynch, please contact me as soon as possible.

Thank you for your cooperation in this matter.

Very truly yours,

Mitchell J. Novis
Mitchell J. Novis
Acting Deputy General Counsel

APR 25 1984

85040514732

85040514733

**AMERICAN FEDERATION
OF GOVERNMENT EMPLOYEES**

1325 Massachusetts Ave., N.W. • Washington, D. C. 20005



George Demougeot, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

GCC# 3149

WILLIAMS & JENSEN

A PROFESSIONAL CORPORATION

LAWYERS

1101 CONNECTICUT AVENUE, N. W.

WASHINGTON, D. C. 20036

TELEPHONE
(202) 698-9201

April 16, 1984

APR 16 P4:14

MUR 1645
Demougeot

PAUL ARNESON
GEORGE D. BAKER
WILLIAM T. BRACK
WILLIAM H. CABLE
PAUL T. CLARK
ANN B. COSTELLO
WINFIELD P. CRIGLER
JUNE E. EDMONDSON
JOHN P. FORD
ROBERT E. GLENNON
J. STEVEN HART
ROBERT E. JENSEN
JOHN J. MCMACKIN, JR.
GEORGE G. OLSEN
CLIFTON PETER ROSE
MARY LYNNE WHALEN
J. D. WILLIAMS

George Demougeot, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: MUR 1645

Dear George:

I am submitting this response on behalf of Congressman William Ford, his campaign committee and treasurer. They have been named as Respondents in the above MUR.

While I cannot help but harbor a grudging admiration for the dogged thoroughness with which the attorneys for the Center on National Labor Policy have digested Congressman Ford's FEC reports, I cannot discern any violation of the Federal Election Campaign Act from their research. AFGE was entitled to contribute \$10,000 to Congressman Ford in the 1981-1982 election cycle. They contributed \$5625 in total. Their only failing was apparently not indicating in their FEC reports which amounts were intended for the primary election and which amounts were intended for the general. Moreover, the treasurer of Congressman Ford's principal campaign committee has, in perhaps a superabundance of caution, refunded \$625 to AFGE.

The Commission cannot predicate a finding of a violation on the mere failure to check a box on the Itemized Schedules of Contributions and Receipts in view of the unquestionable legality of the total amounts contributed. We respectfully urge that the Complaint be dismissed.

Sincerely,

Clifton Peter Rose

/cfs

85040514734

WILLIAMS & JENSEN
A PROFESSIONAL CORPORATION

LAWYERS

101 CONNECTICUT AVENUE, N.W.
WASHINGTON, D.C. 20036

85040514735

George Demougeot, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Committee to Re-Elect

RECEIVED AT THE FEC

6007 5028

CONGRESSMAN WILLIAM D. FORD 84 APR 5 12: 24

3476 CITY NATIONAL BANK BUILDING / DETROIT, MICHIGAN 48226

Telephone: 961-5870



THEODORE MONOLIDIS
TREASURER

April 2, 1984

MUR 1645
Demougeot

14 APR 5 13: 08

Federal Election Commission
Washington, D.C. 20463

Re: MUR 1645

Gentlemen:

This letter constitutes the response, of this Committee, to the above captioned Complaint filed with your office.

Prior to the filing of the Complaint we were unaware that more than the allowable amount had been received from the American Federation of Government Employees PAC. The Complaint correctly identifies the contributions received, resulting in the receipt of \$625.00 in excess of the allowable limit.

Reimbursement of the excess amount has been forwarded to said committee and a copy of our forwarding letter and check are attached hereto.

The acceptance of the excessive amount was not made knowingly or with any intent to violate the Federal Election Campaign Act of 1971, as amended, but was due through inadvertence.

The sum of \$2,500.00 received on 6/25/81 was entered in our records as COFEPE. The other two contributions dated 3/18/82 and 6/22/82, totalling \$3,125.00, were entered in our records as being received from AFGE-PAC. We were inadvertently recording these as separate organizations, but now realize that they are one and the same organization.

We believe that under the circumstances herein recited, and reimbursement having been made, that no further action should be taken against this Committee.

Respectfully submitted,

Theodore Monolidis
THEODORE MONOLIDIS
Treasurer

Subscribed and sworn to before me this 2nd day of April, 1984.

Rita C. Sanchez
Rita C. Sanchez

My Commission expires: 8-25-84

85040514736

Committee to Re-Elect

COPY

CONGRESSMAN WILLIAM D. FORD

3476 CITY NATIONAL BANK BUILDING / DETROIT, MICHIGAN 48226

Telephone: 981-5870

THEODORE MONOLIDIS
TREASURER

April 2, 1984

American Federation of Government
Employees-PAC
1325 Massachusetts Ave., N.W., #703
Washington, D.C. 20005

Gentlemen:

We have received notice from the Federal Election Commission that your contribution to this Committee, in the sum of \$2,500.00 received on June 22, 1982, was in excess of the allowable legal limitation.

Accordingly, there is enclosed our remittance, in the sum of \$625.00, representing reimbursement of the excess funds received.

Very truly yours,

Theodore Monolidis
THEODORE MONOLIDIS
Treasurer

85040514737

COMMITTEE TO RE-ELECT
CONGRESSMAN WILLIAM D. FORD
3476 PENOBSCOT BLDG.
DETROIT, MICH. 48226

1753

April 2, 1984

74-207
724

PAY TO THE ORDER OF American Federation of Government Employees-PAC \$ 625.00

Six Hundred, Twenty-Five and 00/100-----DOLLARS



TAYLOR, MICHIGAN 48160

FOR reimbursement of excess funds received in 1982

Theodore Monolidis

⑆001753⑆ ⑆072602076⑆

310085700⑆

Committee to Re-Elect

Congressman William D. Ford

478 CITY NATIONAL BANK BUILDING
DETROIT, MICHIGAN 48226

850405147



Federal Election Commission
Washington, D.C. 20463



STATEMENT OF DESIGNATION OF COUNSEL

MUR 1645

NAME OF COUNSEL: Clifton Peter Rose

ADDRESS: Williams and Jensen

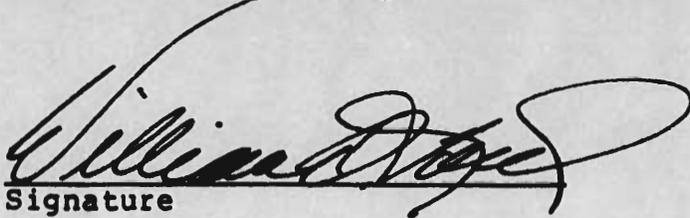
1101 Connecticut Avenue

Washington, D. C. 20036

TELEPHONE: 659-8201

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
and on behalf of the Committee to Re-elect Congressman William D. Ford
communications from the Commission and to act on my behalf/before
the Commission.

4/6/84
Date


Signature

RESPONDENT'S NAME: William D. Ford

ADDRESS: 309 Cannon House Office Building

Washington, D.C. 20515

HOME PHONE: _____

BUSINESS PHONE: 225-6261

CLIFTON PETER ROSE
ATTORNEY AT LAW

WILLIAMS & JENSEN
A PROFESSIONAL CORPORATION
1101 CONNECTICUT AVENUE, N. W.
WASHINGTON, D. C. 20036

(202) 659-8201

85040514739



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Clifton Peter Rose, Esquire
Williams & Jensen
1101-Connecticut Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1645

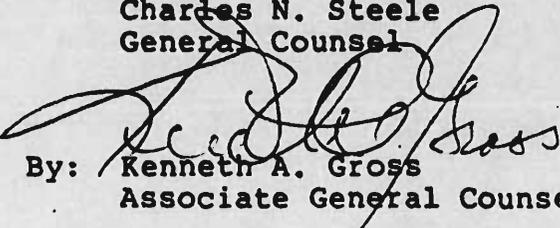
Dear Mr. Rose:

Your letter of April 9, 1984, has been received. In this letter you have requested an extension of time of one week in which to respond to the complaint filed in above-cited matter.

Due to the circumstances cited in your letter, you have been granted the extension, making your response due on or before April 16, 1984.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

85040514740

Conf 2065

WILLIAMS & JENSEN
A PROFESSIONAL CORPORATION
LAWYERS

1101 CONNECTICUT AVENUE, N.W.
WASHINGTON, D.C. 20036

TELEPHONE
(202) 690-8201

PAUL ARNESON
GEORGE D. BAKER
WILLIAM T. BRACK
WILLIAM H. CABLE
PAUL T. CLARK
ANN S. COSTELLO
WINFIELD P. CRIGLER
JUNE E. EDMONDSON
JOHN R. FORD
ROBERT E. GLENNON
J. STEVEN HART
ROBERT E. JENSEN
JOHN J. McMACKIN, JR.
GEORGE G. OLSEN
CLIFTON PETER ROSE
MARY LYNNE WHALEN
J. D. WILLIAMS

APR 9 AM 11:17

April 9, 1984

MUR 1645
Demougeot

George Demougeot, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: MUR 1645

Dear Mr. Demougeot:

I enclosed an original executed Statement of Designation of Counsel in the above MUR. I will be representing both Congressman Ford and the campaign committee.

Because I only received the pertinent papers on Friday, I would like a week extension in which to file my reply on behalf of both respondents. I will respond on or before April 16, 1984.

If you have any questions, please do not hesitate to call.

Sincerely,
Clifton Peter Rose
Clifton Peter Rose

/tls
Enclosure

85040514741

Conf 2065

WILLIAMS & JENSEN
A PROFESSIONAL CORPORATION
LAWYERS
1101 CONNECTICUT AVENUE, N.W.
WASHINGTON, D. C. 20036

PAUL ARNESON
GEORGE D. BAKER
WILLIAM T. BRACK
WILLIAM H. CABLE
PAUL T. CLARK
ANN S. COSTELLO
WINFIELD P. CRIGLER
JUNE E. EDMONDSON
JOHN P. FORD
ROBERT E. GLENNON
J. STEVEN HART
ROBERT E. JENSEN
JOHN J. McMACKIN, JR.
GEORGE G. OLSEN
CLIFTON PETER ROSE
MARY LYNNE WHALEN
J. D. WILLIAMS

TELEPHONE
(202) 550-8201

APR 9 AM 11:17

April 9, 1984

*MUR 1645
Demougeot*

George Demougeot, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: MUR 1645

Dear Mr. Demougeot:

I enclosed an original executed Statement of Designation of Counsel in the above MUR. I will be representing both Congressman Ford and the campaign committee.

Because I only received the pertinent papers on Friday, I would like a week extension in which to file my reply on behalf of both respondents. I will respond on or before April 16, 1984.

If you have any questions, please do not hesitate to call.

Sincerely,
Clifton Peter Rose
Clifton Peter Rose

/t/s

Enclosure

85040514742

WILLIAMS & JENSEN
A PROFESSIONAL CORPORATION

LAWYERS

1101 CONNECTICUT AVENUE, N.W.

WASHINGTON, D.C. 20036

George Demougeot, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

85040514



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 9, 1984

Mitchell J. Notis, Esquire
Acting Deputy General Counsel
American Federation of Government Employees
1325 Massachusetts Avenue, N.W.
Washington, D.C. 20005

RE: MUR 1645

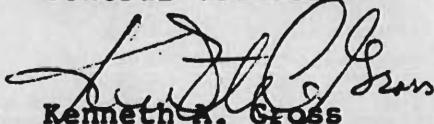
Dear Mr. Notis:

Your letter of April 4, 1984, has been received. In this letter you have requested an extension of time of two weeks in which to respond to the complaint filed in the above-cited matter.

Under our procedures, your response to the complaint would be due on April 11, 1984. In light, however, of the matters outlined in your letter, you have been granted the extension, making your response due on or before April 25, 1984.

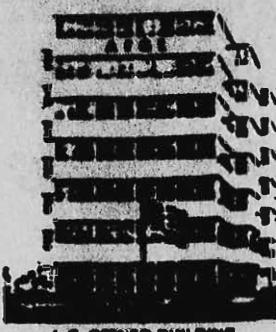
Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Cross
Associate General Counsel

85040514744

BCC # 2018



AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES

AFFILIATED WITH THE AFL-CIO

KENNETH T. BLAYLOCK
NATIONAL PRESIDENT

JOHN H. STURDIVANT
EXECUTIVE VICE PRESIDENT

NICHOLAS J. NOLAN
NATIONAL SEC. TREAS.

1325 MASSACHUSETTS AVE., N.W. WASHINGTON, D. C. 20005
Telephone: (202) 737-8700



IN REPLY PLEASE REFER TO:

HAND DELIVERED

8n/FEC

April 4, 1984

*MUR 1645
Demougeot*

George Demougeot, Esquire
Federal Election Commission
Office of the General Counsel
1325 K Street, N.W.
Seventh Floor
Washington, D.C. 20463

Re: MUR 1645

Dear Mr. Demougeot:

As I informed you in our telephone conversation today, I am representing James Lynch, Jr. and the AFGE PAC in the above-captioned action. In the week since I received the letter from Mr. Gross of your office informing me of the complaint in this case, I have been extremely busy with various cases of mine which are pending in federal court. Specifically, virtually all of my time last week was spent in attempting to obtain a temporary restraining order in the case of AFGE, et al. v. O'Connor, (D.D.C., Case No. 84-0972). My litigation workload and various aspects of the AFGE, et al. v. O'Connor case make it likely that I will be exceedingly busy for the next ten days.

AFGE PAC's response to your letter of March 23, 1984 is currently due on approximately April 11, 1984. Due to the current heavy workload described above, I respectfully request that you grant AFGE PAC an extension of time of two weeks in which to file such a response (i.e. on or before April 25, 1984).

Your telephonic response to this request for extension of time would be appreciated. Thank you for your prompt attention to this matter.

Very truly yours,

Mitchell J. Notis
Mitchell J. Notis
Acting Deputy General Counsel

8 5 0 4 0 5 1 4 7 4 5



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mitchell J. Notis, Esquire
Acting Deputy General Counsel
American Federation of Government Employees
1325 Massachusetts Avenue, N.W.
Washington, D.C. 20005

RE: MUR 1645

Dear Mr. Notis:

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Under our procedures, your response to the complaint would be due on April 11, 1984. In light, however, of the matters outlined in your letter, you have been granted the extension, making your response due on or before April 25, 1984.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

GD 4/6/84

85040514746

BCC # 2018



J. P. GARNER BUILDING

AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES

AFFILIATED WITH THE AFL-CIO

KENNETH T. BLAYLOCK
NATIONAL PRESIDENT

JOHN N. STURDIVANT
EXECUTIVE VICE PRESIDENT

NICHOLAS J. NOLAN
NATIONAL SEC. TREAS.

4 P12:10



1325 MASSACHUSETTS AVE., N.W. • WASHINGTON, D. C. 20005
Telephone: (202) 737-8700

IN REPLY PLEASE REFER TO:

HAND DELIVERED

8n/FEC

April 4, 1984

*MUR 1645
Demougeot*

George Demougeot, Esquire
Federal Election Commission
Office of the General Counsel
1325 K Street, N.W.
Seventh Floor
Washington, D.C. 20463

Re: MUR 1645

Dear Mr. Demougeot:

As I informed you in our telephone conversation today, I am representing James Lynch, Jr. and the AFGE PAC in the above-captioned action. In the week since I received the letter from Mr. Gross of your office informing me of the complaint in this case, I have been extremely busy with various cases of mine which are pending in federal court. Specifically, virtually all of my time last week was spent in attempting to obtain a temporary restraining order in the case of AFGE, et al. v. O'Connor, (D.D.C., Case No. 84-0972). My litigation workload and various aspects of the AFGE, et al. v. O'Connor case make it likely that I will be exceedingly busy for the next ten days.

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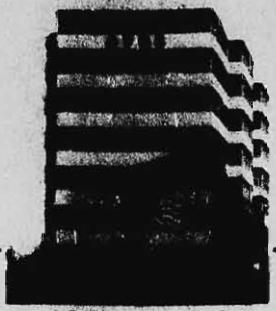
Your telephonic response to this request for extension of time would be appreciated. Thank you for your prompt attention to this matter.

Very truly yours,

Mitchell J. Nolan
Mitchell J. Nolan
Acting Deputy General Counsel

85040514747

BCC # 2018



AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES

AFFILIATED WITH THE AFL-CIO

KENNETH T. BLAYLOCK
NATIONAL PRESIDENT

JOHN N. STURDIVANT
EXECUTIVE VICE PRESIDENT

NICHOLAS J. NOLAN
NATIONAL SEC. TREAS.

1325 MASSACHUSETTS AVE., N.W. · WASHINGTON, D. C. 20005
Telephone: (202) 737-8700



IN REPLY PLEASE REFER TO:

J. P. GRINER BUILDING

HAND DELIVERED

8n/FEC

April 4, 1984

*MUR 1645
Demougeot*

George Demougeot, Esquire
Federal Election Commission
Office of the General Counsel
1325 K Street, N.W.
Seventh Floor
Washington, D.C. 20463

Re: MUR 1645

Dear Mr. Demougeot:

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Your telephonic response to this request for extension of time would be appreciated. Thank you for your prompt attention to this matter.

Very truly yours,

Mitchell J. Notis
Mitchell J. Notis
Acting Deputy General Counsel

85040514748

**AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES**

AFFILIATED WITH THE AFL-CIO



1325 Massachusetts Avenue, N.W.

Washington, D. C. 20005

®

8 5 0 4 0 5 1

George DeMougeot, Esquire
Federal Election Commission
Office of the General Counsel
1325 K Street, N.W.
Seventh Floor
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 23, 1984

Michael Ernest Avakian
Martha M. Poindexter
Center on National Labor Policy
Suite 400
5211 Port Royal Road
Springfield, VA 22151

Dear Mr. Avakian & Ms. Poindexter:

This letter is to acknowledge receipt of your client's complaint which we received on March 16, 1984, against Congressman William D. Ford, Theodore Monolidis, Committee to Re-elect Congressman William D. Ford, J. D. Gleason, American Federation of Government Employees' Committee on Federal Employee Political Education, James H. Lynch, Jr. and American Federation of Government Employees' Political Action Committee which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your client's complaint. Should you have or receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Cheryl Thomas at (202) 523-4073.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross

By Kenneth A. Gross
Associate General Counsel

Enclosure

85040514750

85040514751

MAR 11 45 DEPT OF JUSTICE

2001 April 11, 1984

SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

- 1. The following service is requested (check one).
 - Show to whom and date delivered
 - Show to whom, date, and address of delivery
- 2. RESTRICTED DELIVERY..... (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

3. ARTICLE ADDRESSED TO:
Michael Ernest Avallian
Martha M. Poindexter
Ctr on Natl Labor Policy
Suite 400
6211 Port Royal Rd Springfield Va 22151

4. TYPE OF SERVICE:	ARTICLE NUMBER
<input type="checkbox"/> REGISTERED	943127
<input checked="" type="checkbox"/> CERTIFIED	
<input type="checkbox"/> EXPRESS MAIL	

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY	POSTMARK (Date or city and state)
3/26/84	1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:	7b. EMPLOYEE'S INITIALS

3/26/84



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 23, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable William D. Ford
239 Cannon House Office Building
Washington, D.C. 20515

Re: MUR 1645

Dear Congressman Ford:

This letter is to notify you that on March 16, 1984 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1645. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against you in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

If you 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.

85040514752

If you have any questions, please contact George Demougeot the staff member assigned to this matter at (202) 523-4060. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

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

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

85040514753



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 23, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Theodore Monolidis, Treasurer
Committee to Re-elect Congressman
William D. Ford
3476 CNB Building
Detroit, Michigan 48226

Re: MUR 1645

Dear Mr. Monolidis:

This letter is to notify you that on March 16, 1984 the Federal Election Commission received a complaint which alleges that the committee and you, individually and as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1645. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, individually and as treasurer, in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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

85040514754

If you have any questions, please contact George Demougeot the staff member assigned to this matter at (202) 523-4060. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross

By Kenneth A. Gross
Associate General Counsel

85040514753

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Counsel Statement

Domestic

• GENERAL: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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

- Show to whom and date delivered
- Show to whom, date, and address of delivery

2. RESTRICTED DELIVERY (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$ _____

3. ARTICLE ADDRESSEE TO: *Members, Manalidis, Th. Comm. Hec. to Re-Elect Congressman Wm Ford*
 3476 CNB Bldg
 Detroit, Michigan 48226

4. TYPE OF SERVICE: REGISTERED INSURED CERTIFIED COB EXPRESS MAIL

ARTICLE NUMBER
943137

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE: Addressee Addressee's agent
Kenneth A. Gross

5. DATE OF DELIVERY
3-29-74

6. ADDRESSEE'S ADDRESS (only if registered)
3476 Renard St

7. UNABLE TO DELIVER BECAUSE: _____

EMPLOYEE'S INITIALS

3/29/74 mul 1675 • GPO: 1965 O75-000



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 23, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. D. Gleason, Treasurer
American Federation of Government
Employees' Committee on Federal
Employee Political Education
1325 Massachusetts Avenue N.W.
Washington, D.C. 20005

Re: MUR 1645

Dear Mr. Gleason:

This letter is to notify you that on March 16, 1984 the Federal Election Commission received a complaint which alleges that the committee and you, individually and as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1645. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, individually and as treasurer, in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

If you 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.

85040514756

If you have any questions, please contact George Demougeot the staff member assigned to this matter at (202) 523-4060. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross

By Kenneth A. Gross
Associate General Counsel

8 5 0 4 0 5 1 4 7 5 7

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Counsel Statement

MUR 11.45 Demougeot

1. SERVICE: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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

Show to whom and date delivered

Show to whom, date, and address of delivery

2. RESTRICTED DELIVERY

(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

3. ARTICLE ADDRESSED TO: J. D. Gleason, Jr.
American Federation of Government Employees
Political Education Committee, One Federal Building
1305 Mass Ave NW # 703
Washington, DC 20005

4. TYPE OF SERVICE:

REGISTERED INSURED

CERTIFIED COO

EXPRESS MAIL

ARTICLE NUMBER: 943136

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE: *George Demougeot*

6. DATE OF DELIVERY: 3-27-84

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

EMPLOYEE'S INITIALS

1984 MAR 27

1-800-375-5037

4 GPO: 1983-578-503



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 23, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James H. Lynch, Jr., Treasurer
American Federation of Government
Employees' Political Action
Committee
1325 Massachusetts Avenue N.W.
Washington, D.C. 20005

Re: MUR 1645

Dear Mr. Lynch:

This letter is to notify you that on March 16, 1984 the Federal Election Commission received a complaint which alleges that the committee and you, individually and as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1645. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, individually and as treasurer, in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

If you 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.

85040514758

If you have any questions, please contact George Demougout the staff member assigned to this matter at (202) 523-4060. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross

By Kenneth A. Gross
Associate General Counsel

85040514759

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Counsel Statement

MUR 1645 Demougout

SEARCH Complete Steps 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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

- Show to whom and date delivered
- Show to whom, date, and address of delivery

2. RESTRICTED DELIVERY

(No additional delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

3. ARTICLE ADDRESS TO:

JAMES H. LUNCH, Jr., Tr.
American Federation of Government
Employees Political Action Committee
1705 MONTGOMERY AVE N.W.
WASHINGTON, DC 20005

4. TYPE OF SERVICE:

- REGISTERED
- CERTIFIED
- EXPRESS MAIL

INSURED O.C.D.

ARTICLE NUMBER 943135

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ADDRESS DATE OF DELIVERY

George Demougout

3-28-84

6. ADDRESSEE'S ADDRESS (only if requested)

7. UNABLE TO DELIVER BECAUSE:

WASHINGTON, DC 20005

POSTMARK (may be on reverse side)

WASHINGTON, DC 20005

APR 1 1984

U.S. MAIL

U.S. POSTAL SERVICE

• 49: 105070-000

GCC#1579

Grant Bond

24 MAR 16 AM 10

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

James Edward Antosh)
13 Gilpin)
Shawnee, Oklahoma 74801,)
Complainant,)

v.)

Complaint)
MUR No. 1645)

William D. Ford; Committee to)
Re-elect Congressman William D.)
Ford; the separate segregated)
funds of the American Federation)
of Government Employees, the)
American Federation of)
Government Employees' Committee)
on Federal Employee Political)
Education and the American)
Federation of Government)
Employees' - Political Action)
Committee; and all the)
Committees' treasurers,)
Respondents.)

85040514760

I. INTRODUCTION

1. Pursuant to 2 U.S.C. §437g(a)(1) James Edward Antosh brings this complaint against candidate for federal public office, William D. Ford, Committee to Re-elect Congressman William D. Ford, the separate segregated funds ("SSFs") of the American Federation of Government Employees ("AFGE"), the American Federation of Government Employees' Committee on Federal Employee Political Education ("AFGE's COFEPE") and the American Federation of Government Employees'- Political Action Committee ("AFGE-PAC"), and all the Committees' treasurers individually and in their capacities as treasurers for the making and receiving of excessive contributions in violation of 2 U.S.C. §441a(f) and 2 U.S.C. §441a(a)(2)(A).

II. PARTIES

2. Complainant is James Edward Antosh who resides at 13 Gilpin, Shawnee, Oklahoma 74801. He is a citizen of the United States, over the age of 18 years and a registered voter of the State of Oklahoma.

Respondents are:

- a. William D. Ford, 3476 CNB Building, Detroit, Michigan 48226.
- b. Theodore Monolidis, individually and in his capacity as treasurer of Committee to Re-elect Congressman William D. Ford, 3476 CNB Building, Detroit, Michigan 48226.

85040514761

85040514762

- c. Committee to Re-elect Congressman William D. Ford,
 - 3476 CNB Building, Detroit, Michigan 48226.
 - 3476 Penobscot Building, Detroit, Michigan 48226
 - 1919 Pennsylvania Avenue, N.W., Suite 800
Washington, D.C. 20006.

- d. J. D. Gleason, individually and in his capacity as treasurer of the American Federation of Government Employees' Committee on Federal Employee Political Education, 1325 Massachusetts Avenue, N.W., #703, Washington, D.C. 20005.

- e. The American Federation of Government Employees' Committee on Federal Employee Political Education, 1325 Massachusetts Avenue, N.W., #703, Washington, D.C. 20005.

- f. James H. Lynch Jr. individually and in his capacity as treasurer of the American Federation of Government Employees' Political Action Committee, 1325 Massachusetts Avenue, Washington, D.C. 20005.

- g. The American Federation of Government Employees' Political Action Committee, 1325 Massachusetts Avenue, N.W., Washington, D.C. 20005.

III. LIABILITY

3. Liability may be imposed upon the candidate, William D. Ford, Committee to Re-elect Congressman William D. Ford, AFGE's

COFEPE and AFGE-PAC, pursuant to 2 U.S.C. §441a(a) which establishes the \$5,000.00 (FIVE THOUSAND DOLLARS) maximum contribution ceiling and 2 U.S.C. §441a(f) which proscribes a candidate or political committee from accepting any contributions in excess of \$5,000.00 (FIVE THOUSAND DOLLARS).

4. Liability may be imposed on the treasurers, personally and in their capacities as treasurers pursuant to 11 C.F.R. §104.14(d).

5. For purposes of this complaint, contributions made by the SSFs of AFGE, AFGE's COFEPE and AFGE-PAC, are treated as contributions made from a single committee in accordance with 2 U.S.C. §441a(a)(5) as implemented through 11 C.F.R. §100.5(g)(1)(B).

IV. OVERVIEW

6. Based on complainant's information and belief, Respondents have contributed or received an aggregate in excess of \$5,000.00 (FIVE THOUSAND DOLLARS) for the 1982 federal primary election in which William D. Ford was a candidate for public office. Complainant bases his belief on review of the Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" which William D. Ford; Committee to Re-elect Congressman William D. Ford and its treasurer; AFGE's COFEPE and its treasurer; and AFGE-PAC and its treasurer filed for the 1982 federal primary election.

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7. For the 1982 federal primary election, excessive funds were contributed to William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer by AFGE's COFEPE and its treasurer and AFGE-PAC and its treasurer. The 1982 Michigan Congressional primary election was held on August 3, 1982.

8. These unlawful contributions constitute a violation of the Federal Election Campaign Act, 2 U.S.C. §441a(a)(2)(A) which provides that a multicandidate political committee may not contribute more than \$5,000.00 (FIVE THOUSAND DOLLARS) to any candidate and his authorized political committee with respect to any election for federal office and §441a(f) which prohibits a candidate from receiving illegal contributions.

**V. VIOLATIONS OF THE F.E.C.A.
BY
COMMITTEE TO RE-ELECT CONGRESSMAN WILLIAM D. FORD
IN THE
1982 FEDERAL PRIMARY ELECTION**

9. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable amendments, which Respondents filed with the Federal Election Commission, Complainant believes that candidate for public office, William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal primary election from AFGE's COFEPE and AFGE-PAC in the amount of \$5,625.00 (FIVE

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THOUSAND SIX HUNDRED TWENTY FIVE DOLLARS).

10. Candidate William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer, for the 1982 federal primary election, accepted contributions from AFGE's COFEPE and AFGE-PAC in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>Contributor</u>	<u>F.E.C. Microfilm Location</u>
6/25/81	\$2,500.00	AFGE' COFEPE	#82012141941
3/18/82	\$ 625.00	AFGE-PAC	#81012020656
6/22/82	<u>\$2,500.00</u>	AFGE-PAC	#82012201209
Total =	\$5,625.00		

11. A running total of contributions from AFGE's COFEPE and AFGE-PAC would have put on notice William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer that they had received \$3,125.00 (THREE THOUSAND ONE HUNDRED TWENTY FIVE DOLLARS) on March 18, 1982. On that date, William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer were only permitted to accept an additional contribution of \$1,875.00 (ONE THOUSAND EIGHT HUNDRED SEVENTY FIVE DOLLARS). In violation of 2 U.S.C. §441a(f), they accepted additional contributions and thereby exceeded the maximum \$5,000.00 (FIVE THOUSAND DOLLARS) the statute permits them to accept.

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**VI. VIOLATIONS OF THE F.E.C.A.
BY
AFGE'S COFEPE and AFGE-PAC
IN THE
1982 FEDERAL PRIMARY ELECTION**

12. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable amendments, which Respondents filed with the Federal Election Commission, the Complainant believes that AFGE's COFEPE and AFGE-PAC for the 1982 federal primary election contributed to candidate William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer a total of \$5,625.00 (FIVE THOUSAND SIX HUNDRED TWENTY FIVE DOLLARS).

13. AFGE's COFEPE and AFGE-PAC contributed the following amounts:

- a. On June 15, 1981, AFGE's COFEPE contributed \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS). (See F.E.C. Microfilm #81032004062.)
- b. On March 10, 1982, AFGE-PAC contributed \$625.00 (SIX HUNDRED TWENTY FIVE DOLLARS). (See F.E.C. Microfilm #82032294271.)
- c. On April 8, 1982, AFGE-PAC contributed \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS). (See F.E.C. Microfilm #82032313870.)

14. A running total of contributions made to William D. Ford,

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Committee to Re-elect Congressman William D. Ford and its treasurer would have put on notice AFGE's COFEPE and AFGE-PAC that as of March 10, 1982, they had contributed \$3,125.00 (THREE THOUSAND ONE HUNDRED TWENTY FIVE DOLLARS) and that they could only contribute an additional \$1,875.00 (ONE THOUSAND EIGHT HUNDRED SEVENTY FIVE DOLLARS) if they wished to meet the mandates of the law. In violation of 2 U.S.C. §441a(a)(2)(A), a \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS) contribution was made to William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer. This amount exceeded the statutory monetary ceiling by \$625.00 (SIX HUNDRED TWENTY FIVE DOLLARS).

15. AFGE's COFEPE and its treasurer failed to accurately report the \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS) contribution of June 15, 1981 made to William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer. In violation of 11 C.F.R. §104.14(d), AFGE's COFEPE and its treasurer failed to designate whether the contribution was intended for the primary or the general election. (See F.E.C. Microfilm #81032004062.)

However, the contribution was made more than thirteen months before the Michigan Congressional primary election which was held on August 3, 1982. This indicates that the \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS) contribution of July 15, 1981 was intended by AFGE's COFEPE for the primary election.

16. AFGE-PAC and its treasurer failed to accurately report

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the \$625.00 (SIX HUNDRED TWENTY FIVE DOLLARS) contribution of March 10, 1982 and the \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS) contribution of April 8, 1982 made to William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer. In violation of 11 C.F.R. §104.14(d), AFGE-PAC and its treasurer failed to designate whether the contributions were intended for the primary or the general election. (See F.E.C. Microfilm #s 82032294271 and 82032313870.) However, the contributions were made approximately four and five months respectively before the Michigan Congressional primary election which was held on August 3, 1982. This indicates that the contributions were intended by AFGE-PAC for the primary election.

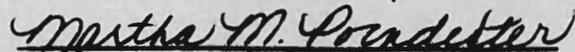
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VII. CONCLUSION

17. As documented above, Respondents have violated the spirit and letter of the Federal Election Campaign Act.

18. Complainant requests that an investigation into this complaint be undertaken, that Respondents be ordered to return the accepted excess contributions and that civil sanctions be imposed on the Respondents.


Michael Ernest Avakian
Center on National Labor Policy


Martha M. Poindexter
Martha M. Poindexter
Center on National Labor Policy
5211 Port Royal Road, Suite 400
North Springfield, VA 22151
(703) 321-9180

Attorneys for Complainant

March 16, 1984

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VERIFICATION OF CITIZEN COMPLAINANT

Shawnee)
)
State of Oklahoma) ss.

Pursuant to 2 U.S.C. §437g(a)(1), I, James Edward Antosh, being first duly sworn, say that I have read the foregoing complaint and know the contents thereof, and that the same is true on information and belief. This complaint was not filed at the request or suggestion of any candidate. I am a citizen of the United States, over the age of 18 years and a registered voter of the State of Oklahoma.

James Edward Antosh

Subscribed and sworn to before me this 29th day of February 1984.

Denise K. Almon
Notary Public

My Commission expires:

Sept. 17, 1986

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DESIGNATION OF COUNSEL

I, James Edward Antosh, a complainant to the attached complaint designate the attorney(s) identified below as complainant's attorney(s) of record. The Federal Election Commission shall direct all written and oral communications in connection with this matter to my designated counsel.

Feb. 29, 1984
Date

James Edward Antosh
Complainant

DESIGNATED COUNSEL

Michael Ernest Avakian
Martha M. Poindexter
Center on National Labor Policy
Suite 400
5211 Port Royal Road
Springfield, Virginia 22151

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EAGLE-A
Trojan Board

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

James Edward Antosh)
13 Gilpin)
Shawnee, Oklahoma 74801,)
Complainant,)

v.)

William D. Ford; Committee to)
Re-elect Congressman William D.)
Ford; the separate segregated)
funds of the American Federation)
of Government Employees, the)
American Federation of)
Government Employees' Committee)
on Federal Employee Political)
Education and the American)
Federation of Government)
Employees' - Political Action)
Committee; and all the)
Committees' treasurers,)

Respondents.)

Complaint
MUR No. 1645

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I. INTRODUCTION

1. Pursuant to 2 U.S.C. §437g(a)(1) James Edward Antosh brings this complaint against candidate for federal public office, William D. Ford, Committee to Re-elect Congressman William D. Ford, the separate segregated funds ("SSFs") of the American Federation of Government Employees ("AFGE"), the American Federation of Government Employees' Committee on Federal Employee Political Education ("AFGE's COFEPE") and the American Federation of Government Employees'- Political Action Committee ("AFGE-PAC"), and all the Committees' treasurers individually and in their capacities as treasurers for the making and receiving of excessive contributions in violation of 2 U.S.C. §441a(f) and 2 U.S.C. §441a(a)(2)(A).

II. PARTIES

2. Complainant is James Edward Antosh who resides at 13 Gilpin, Shawnee, Oklahoma 74801. He is a citizen of the United States, over the age of 18 years and a registered voter of the State of Oklahoma.

Respondents are:

- a. William D. Ford, 3476 CNB Building, Detroit, Michigan 48226.
- b. Theodore Monolidis, individually and in his capacity as treasurer of Committee to Re-elect Congressman William D. Ford, 3476 CNB Building, Detroit, Michigan 48226.

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- c. Committee to Re-elect Congressman William D. Ford,
 - 3476 CNB Building, Detroit, Michigan 48226.
 - 3476 Penobscot Building, Detroit, Michigan 48226
 - 1919 Pennsylvania Avenue, N.W., Suite 800
Washington, D.C. 20006.

- d. J. D. Gleason, individually and in his capacity as treasurer of the American Federation of Government Employees' Committee on Federal Employee Political Education, 1325 Massachusetts Avenue, N.W., #703, Washington, D.C. 20005.

- e. The American Federation of Government Employees' Committee on Federal Employee Political Education, 1325 Massachusetts Avenue, N.W., #703, Washington, D.C. 20005.

- f. James H. Lynch Jr. individually and in his capacity as treasurer of the American Federation of Government Employees' Political Action Committee, 1325 Massachusetts Avenue, Washington, D.C. 20005.

- g. The American Federation of Government Employees' Political Action Committee, 1325 Massachusetts Avenue, N.W., Washington, D.C. 20005.

III. LIABILITY

3. Liability may be imposed upon the candidate, William D. Ford, Committee to Re-elect Congressman William D. Ford, AFGE's

COFEPE and AFGE-PAC, pursuant to 2 U.S.C. §441a(a) which establishes the \$5,000.00 (FIVE THOUSAND DOLLARS) maximum contribution ceiling and 2 U.S.C. §441a(f) which proscribes a candidate or political committee from accepting any contributions in excess of \$5,000.00 (FIVE THOUSAND DOLLARS).

4. Liability may be imposed on the treasurers, personally and in their capacities as treasurers pursuant to 11 C.F.R. §104.14(d).

5. For purposes of this complaint, contributions made by the SSFs of AFGE, AFGE's COFEPE and AFGE-PAC, are treated as contributions made from a single committee in accordance with 2 U.S.C. §441a(a)(5) as implemented through 11 C.F.R. §100.5(g)(1)(B).

IV. OVERVIEW

6. Based on complainant's information and belief, Respondents have contributed or received an aggregate in excess of \$5,000.00 (FIVE THOUSAND DOLLARS) for the 1982 federal primary election in which William D. Ford was a candidate for public office. Complainant bases his belief on review of the Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" which William D. Ford; Committee to Re-elect Congressman William D. Ford and its treasurer; AFGE's COFEPE and its treasurer; and AFGE-PAC and its treasurer filed for the 1982 federal primary election.

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7. For the 1982 federal primary election, excessive funds were contributed to William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer by AFGE's COFEPE and its treasurer and AFGE-PAC and its treasurer. The 1982 Michigan Congressional primary election was held on August 3, 1982.

8. These unlawful contributions constitute a violation of the Federal Election Campaign Act, 2 U.S.C. §441a(a)(2)(A) which provides that a multicandidate political committee may not contribute more than \$5,000.00 (FIVE THOUSAND DOLLARS) to any candidate and his authorized political committee with respect to any election for federal office and §441a(f) which prohibits a candidate from receiving illegal contributions.

**V. VIOLATIONS OF THE F.E.C.A.
BY
COMMITTEE TO RE-ELECT CONGRESSMAN WILLIAM D. FORD
IN THE
1982 FEDERAL PRIMARY ELECTION**

9. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable amendments, which Respondents filed with the Federal Election Commission, Complainant believes that candidate for public office, William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal primary election from AFGE's COFEPE and AFGE-PAC in the amount of \$5,625.00 (FIVE

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THOUSAND SIX HUNDRED TWENTY FIVE DOLLARS).

10. Candidate William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer, for the 1982 federal primary election, accepted contributions from AFGE's COFEPE and AFGE-PAC in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>Contributor</u>	<u>F.E.C. Microfilm Location</u>
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6/22/82	<u>\$2,500.00</u>	AFGE-PAC	#82012201209
Total =	\$5,625.00		

11. A running total of contributions from AFGE's COFEPE and AFGE-PAC would have put on notice William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer that they had received \$3,125.00 (THREE THOUSAND ONE HUNDRED TWENTY FIVE DOLLARS) on March 18, 1982. On that date, William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer were only permitted to accept an additional contribution of \$1,875.00 (ONE THOUSAND EIGHT HUNDRED SEVENTY FIVE DOLLARS). In violation of 2 U.S.C. §441a(f), they accepted additional contributions and thereby exceeded the maximum \$5,000.00 (FIVE THOUSAND DOLLARS) the statute permits them to accept.

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**VI. VIOLATIONS OF THE F.E.C.A.
BY
AFGE'S COFEPE and AFGE-PAC
IN THE
1982 FEDERAL PRIMARY ELECTION**

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14. A running total of contributions made to William D. Ford,

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Committee to Re-elect Congressman William D. Ford, and its treasurer would have put on notice AFGE's COFEPE and AFGE-PAC that as of March 10, 1982, they had contributed \$3,125.00 (THREE THOUSAND ONE HUNDRED TWENTY FIVE DOLLARS) and that they could only contribute an additional \$1,875.00 (ONE THOUSAND EIGHT HUNDRED SEVENTY FIVE DOLLARS) if they wished to meet the mandates of the law. In violation of 2 U.S.C. §441a(a)(2)(A), a \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS) contribution was made to William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer. This amount exceeded the statutory monetary ceiling by \$625.00 (SIX HUNDRED TWENTY FIVE DOLLARS).

15. AFGE's COFEPE and its treasurer failed to accurately report the \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS) contribution of June 15, 1981 made to William D. Ford, Committee to Re-elect Congressman William D. Ford and its treasurer. In violation of 11 C.F.R. §104.14(d), AFGE's COFEPE and its treasurer failed to designate whether the contribution was intended for the primary or the general election. (See F.E.C. Microfilm #81032004062.)

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16. AFGE-PAC and its treasurer failed to accurately report

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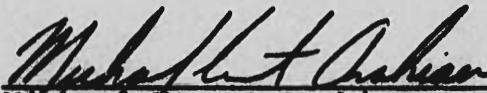
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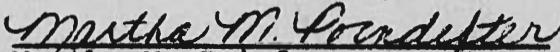
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VII. CONCLUSION

17. As documented above, Respondents have violated the spirit and letter of the Federal Election Campaign Act.

18. Complainant requests that an investigation into this complaint be undertaken, that Respondents be ordered to return the accepted excess contributions and that civil sanctions be imposed on the Respondents.


Michael Ernest Avakian
Center on National Labor Policy


Martha M. Poindexter
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5211 Port Royal Road, Suite 400
North Springfield, VA 22151
(703) 321-9180

Attorneys for Complainant

March 16, 1984

85040514781

VERIFICATION OF CITIZEN COMPLAINANT

Shawnee)
)
State of Oklahoma) ss.

Pursuant to 2 U.S.C. §437g(a)(1), I, James Edward Antosh, being first duly sworn, say that I have read the foregoing complaint and know the contents thereof, and that the same is true on information and belief. This complaint was not filed at the request or suggestion of any candidate. I am a citizen of the United States, over the age of 18 years and a registered voter of the State of Oklahoma.

James Edward Antosh

Subscribed and sworn to before me this 29th day of February 1984.

Denise K. Almon
Notary Public

My Commission expires:

Sept. 17, 1986

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DESIGNATION OF COUNSEL

I, James Edward Antosh, a complainant to the attached complaint designate the attorney(s) identified below as complainant's attorney(s) of record. The Federal Election Commission shall direct all written and oral communications in connection with this matter to my designated counsel.

Feb. 29, 1984
Date

James Edward Antosh
Complainant

DESIGNATED COUNSEL

Michael Ernest Avakian
Martha M. Poindexter
Center on National Labor Policy
Suite 400
5211 Port Royal Road
Springfield, Virginia 22151

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FEDERAL ELECTION COMMISSION

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

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THIS IS THE BEGINNING OF MUR # 1645

Date Filmed 3/18/85 Camera No. --- 3

Cameraman JRL