



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1657

Date Filmed 1/2/85 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

Routing slip

Commissioner's Objections Sheet

12 Day Report

RFAI notices

Comment sheets

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

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

Signed Marty Romney
date 12/12/84

84040493823

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

American Federation of Labor-Congress)
Industrial Organizations Committee)
on Political Education and Political)
Contributions Committee and its)
treasurer, Thomas R. Donahue,)
et. al.)

MUR 1657

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 4, 1984, the Commission decided by a vote of 5-0 to take the following actions in MUR 1657:

1. Take no further action against the American Federation of Labor-Congress of Industrial Organizations Committee on Political Education and Political Contributions Committee and its treasurer, Thomas R. Donahue, and the Political Education Fund of the Building and Construction Trades Department and its treasurer, Joseph F. Maloney with respect to 2 U.S.C. § 441a(a)(2)(A).
2. Find reason to believe that the Political Education Fund of the Building and Construction Trades Department and its treasurer, Joseph F. Maloney, violated 11 C.F.R. § 104.14(d), but take no further action.
3. Take no further action against Local 1814 International Longshoremans Association AFL-CIO Political Action and Education Fund, and its treasurer, Joseph Randazzo with respect to 2 U.S.C. § 441a(a)(2)(A).

(Continued)

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4. Find reason to believe that the Local 1814 International Longshoremen Association AFL-CIO Political Action and Education Fund, and its treasurer, Joseph Randazzo violated 11 C.F.R. § 104.14(d), but take no further action.
5. Approve and authorize the sending of the letters attached to the General Counsel's Report signed November 29, 1984.
6. Close the file.

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

Attest:

12-5-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

11-30-84, 9:41
11-30-84, 2:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 21, 1984

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

Re: MUR 1657

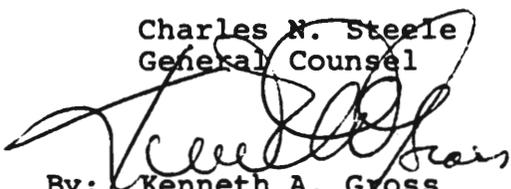
Dear Mr. Avakian and Ms. Poindexter:

By letter dated December 7, 1984, you were notified of the Commission's determination in this matter. However, due to an inadvertent error the date on which the Commission decided to close the file was not included. The appropriate sentence of paragraph two of the December 7 letter should read, "After an investigation was conducted, the Commission concluded on December 4, 1984, to take no further action."

If you have any questions, please contact George Demougeot, 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

December 7, 1984

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

RE: MUR 1657

Dear Mr. Avakian and Ms. Poindexter:

This is in reference to the complaint you filed with the Commission on March 30, 1984, concerning alleged excessive contributions accepted by the Committee to Re-elect Congressman Leo C. Zeferetti.

Based on your complaint, the Commission determined there was no reason to believe that the Committee to Re-elect Congressman Leo C. Zeferetti violated any provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Commission found there was reason to believe that the American Federation of Labor-Congress of Industrial Organizations Committee on Political Education and Political Contributions Committee, the Political Education Fund of the Building and Construction Trades Department and Local 1814 International Longshoremans Association AFL-CIO Political Action and Education Fund violated 2 U.S.C. § 441a(2)(A), a provision of the Act. The Commission also found reason to believe that the Political Education Fund of the Building and Construction Trades Department and Local 1814 International Longshoremans Association AFL-CIO Political Action and Education Fund violated 11 C.F.R. § 104.14(d). After an investigation was conducted, the Commission concluded on 1984, to take no further action in this matter. Accordingly, the file in this matter, numbered MUR 1657, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

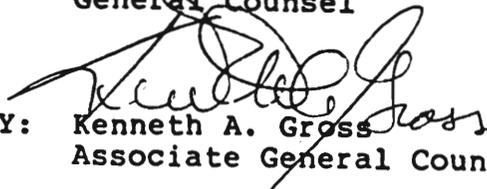
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Michael Ernest Avakian, Esquire
Martha M. Poindexter, Esquire
Page 2

If you have any questions, please contact Martha Romney, 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
General Counsel's Report

84040493828



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 7, 1984

Robert D. Kurnick, Esquire
Political Education Fund of the Building
and Construction Trades Department
815 16th Street, N.W., Suite 603
Washington, D.C. 20006-4189

RE: MUR 1657
Political Education Fund of the Building
and Construction Trades Department and
Joseph F. Maloney, as treasurer

Dear Mr. Kurnick:

The Commission in connection with the above referenced MUR found reason to believe on July 10, 1984, that your client had violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and on December 4, 1984, found reason to believe that your client had violated 11 C.F.R. § 104.14(d). However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file.

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

If you have any questions, please direct them to Martha Romney, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

A handwritten signature in cursive script that reads "Lee Ann Elliott".

Lee Ann Elliott
Chairman

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 7, 1984

Anthony Thomas Scotto, Esquire
Bogucci, DeChiara & Scotto
26 Court Street
Brooklyn, New York 11424

RE: MUR 1657
Local 1814 International
Longshoremans Association AFL-CIO
Political Action and Education Fund
and Joseph Randazzo, as treasurer

Dear Mr. Scotto:

The Commission in connection with the above referenced MUR found reason to believe on July 10, 1984, that your client had violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and on December 4, 1984, found reason to believe that your client had violated 11 C.F.R. § 104.14(d). However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file.

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

If you have any questions, please direct them to Martha Romney, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Lee Ann Elliott
Chairman

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 7, 1984

Margaret E. McCormick, Esquire
American Federation of Labor-Congress
of Industrial Organization Committee
915 16th Street, N.W.
Washington, D.C. 20006-4189

RE: MUR 1657
American Federation of Labor-Congress of
Industrial Organizations Committee on
Political Education and Political
Contributions Committee and Thomas R.
Donahue, as treasurer

Dear Ms. McCormick:

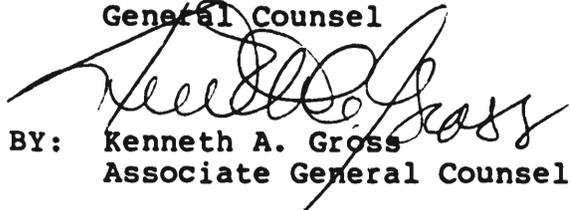
On July 10, 1984, the Commission found reason to believe that your client had violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file.

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

If you have any questions, please direct them to Martha Romney, 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
General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 7, 1984

Eileen P. Deering, Treasurer
Committee to Re-elect Congressman
Leo C. Zeferetti
11 Jamaica Walk
Breezy Point, New York 11692

RE: MUR 1657
Committee to Re-elect Congressman
Leo C. Zeferetti

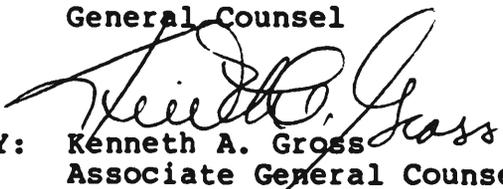
Dear Ms. Deering:

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 Martha Romney, 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
General Counsel's Report

cc: Leo C. Zeferetti

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SENSITIVE

RECEIVED
OFFICE OF THE FEC
SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 American Federation of Labor-Congress)
 Industrial Organizations Committee on)
 Political Education and Political)
 Contributions Committee and)
 its treasurer, Thomas R. Donahue)
 Political Education Fund of the)
 Building and Construction Trades)
 Department and its treasurer,)
 Joseph F. Maloney)
 Local 1814 International Longshoremans)
 Association AFL-CIO Political Action)
 and Education Fund and its treasurer,)
 Joseph Randazzo)

24 NOV 30 A 9: 41

MUR 1657

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter was generated by a complaint filed by James Edward Antosh alleging violations of the Federal Election Campaign Act of 1971, as amended, by the Committee to Re-Elect Congressman Leo C. Zeferetti and its treasurer, Eileen P. Deering ("Zeferetti Committee"), by the American Federation of Labor-Congress of Industrial Organizations Committee on Political Education and Political Contributions Committee and its treasurer, Thomas P. Donahue ("AFL-CIO COPE-PCC"), by the Political Education Fund of the Building and Construction Trades Department, and its treasurer, Joseph F. Maloney ("P.E.F.-B.C.T.D."), and by Local 1814 International Longshoremans Association AFL-CIO Political Action and Education Fund and its treasurer, Joseph Randazzo ("Local 1814 ILA AFL-CIO P.A.E.F."). The Commission found reason to believe that AFL-CIO COPE-PCC, P.E.F.-B.C.T.D., and Local 1814 ILA AFL-CIO P.A.E.F.

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violated 2 U.S.C. § 441a(a)(2)(A) and no reason to believe that the Zeferetti Committee violated 2 U.S.C. § 441a(f).

Contributions of AFL-CIO COPE PCC & P.E.F.-B.C.T.D.

According to a review of reports filed with the Commission AFL-CIO COPE PCC and P.E.F.-B.C.T.D. made the following contributions for the 1982 federal general election to the Zeferetti Committee.

<u>CONTRIBUTOR</u>	<u>AMOUNT</u>	<u>DATE REPORTED GIVEN</u>	<u>ELECTION REPORTED BY CONTRIBUTOR</u>	<u>DATE REPORTED RECEIVED</u>	<u>ELECTION REPORTED BY RECIPIENT</u>
P.E.F.-B.C.T.D.	\$2,500	3/23/82	General	3/31/82	Primary
AFL-CIO COPE-PCC	\$2,500	9/21/82	General	10/17/82	General
AFL-CIO COPE-PCC	\$1,000	10/28/82	General	10/27/82	General
P.E.F.-B.C.T.D.	\$ 500	2/10/83	General	3/4/83	General
Total	\$6,500				

The primary election was held on September 14, 1982.

In response to the complaint, AFL-CIO COPE-PCC and P.E.F.-B.C.T.D. state that the Respondents' 1982 contribution records reflect that the \$2,500 contribution was contributed by the P.E.F.-B.C.T.D. on March 23, 1982, prior to the 1982 primary. Further, Respondents state that although P.E.F.-B.C.T.D. reported this amount in its FEC reports as a contribution for the general election, the AFL-CIO COPE-PCC recorded the P.E.F.-B.C.T.D. contribution as a contribution for the primary election in its internal contributions ledger. On that basis AFL-CIO COPE-PCC made two additional contributions and P.E.F.-B.C.T.D. made one additional contribution for the 1982 general election to the Zeferetti Committee. P.E.F.-B.C.T.D. amended its March 1982 FEC

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reports to designate the \$2,500 contribution for the primary election.

In response to the reason to believe notification (Attachment I) AFL-CIO COPE-PCC and P.E.F.-B.C.T.D. explain that the \$2,500 was used to buy tickets to a fundraiser held by the Zeferetti Committee on March 25, 1982. A copy of an internal ledger and a receipt were submitted with the response. Further, AFL-CIO COPE-PCC and P.E.F.-B.C.T.D. state that the purpose of the fundraiser was to raise contributions for Congressman Zeferetti's 1982 primary election campaign. An affidavit by Leo C. Zeferetti was submitted by AFL-CIO COPE-PCC and P.E.F.-B.C.T.D. to substantiate this.

Thus, even though the \$2,500 contribution was designated in the report of P.E.F.-B.C.T.D. as for the general election, Respondents have now produced contemporaneous evidence showing that the contribution was intended for the primary election. Thus, it appears that AFL-CIO COPE-PCC and P.E.F.-B.C.T.D. did not make an excessive contribution to the Zeferetti Committee. Accordingly, the Office of General Counsel recommends that the Commission take no further action against AFL-CIO COPE-PCC and P.E.F.-B.C.T.D. with regard to the 2 U.S.C. § 441a(a)(2)(A) violation.

However, P.E.F.-B.C.T.D. checked the wrong box by marking the general election box for a primary election contribution. The incorrect checking has now been corrected. Thus, we recommend that the Commission find reason to believe that P.E.F.-B.C.T.D.

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violated 11 C.F.R. § 104.14(d), but take no further action.

Contributions of Local 1814 ILA AFL-CIO P.A.E.F.

According to a review of reports filed with the Commission, Local 1814 ILA AFL-CIO P.A.E.F. made the following contributions to the Zeferetti Committee.

<u>CONTRIBUTOR</u>	<u>AMOUNT</u>	<u>DATE REPORTED GIVEN</u>	<u>ELECTION REPORTED BY CONTRIBUTOR</u>	<u>DATE REPORTED RECEIVED</u>	<u>ELECTION REPORTED BY RECIPIENT</u>
Local 1814 ILA AFL-CIO P.A.E.F.	\$3,500	3/17/82	General	3/25/82	Primary
Local 1814 ILA AFL-CIO P.A.E.F.	\$5,000	10/13/82	General	10/14/82	General
Total	\$8,500				

The primary election was held on September 14, 1984.

In response to the complaint, Local 1814 ILA AFL-CIO P.A.E.F. states that on March 17, 1982, a \$3,500 contribution was made to the Zeferetti Committee. However, when the contribution was reported in the monthly report filed on April 15, 1982, Local 1814 ILA AFL-CIO P.A.E.F. states that it erroneously checked the general election box. The check stub submitted with the response indicates that the \$3,500 was for seven tickets to the Gala Celebrity Reception for Congressman Leo C. Zeferetti. No further information was provided about the reception, however. On October 13, 1982, a \$5,000 contribution was made to the Zeferetti Committee. This contribution was intended for the general election and the general election box was checked in the report.

In response to the reason to believe notification Local 1814 ILA AFL-CIO P.A.E.F. reiterates its position that the \$3,500

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contribution was intended for the primary election. Local 1814 ILA AFL-CIO P.A.E.F. filed an amended report on April 24, 1984, in which it changed the report to designate the contribution for the primary election. Local 1814 ILA AFL-CIO P.A.E.F. states that the contribution was for tickets to a reception held on March 25, 1982. A copy of the check stub submitted by the respondent indicates that seven tickets were purchased to a Gala Celebrity Reception for Congressman Zeferetti. Leo C. Zeferetti in his affidavit states that in March of 1982 his campaign committee conducted a series of receptions in order to raise funds for the primary election campaign. The fundraising events included a reception on March 25, 1982, in Brooklyn, New York.

Accordingly, even though the \$3,500 contribution was designated in the report of Local 1814 ILA AFL-CIO P.A.E.F. as for the general election, there is contemporaneous evidence showing that the contribution was intended for the primary election. Thus, it appears that Local 1814 ILA AFL-CIO P.A.E.F. did not make an excessive contribution to the Zeferetti Committee. Accordingly, the Office of General Counsel recommends that the Commission take no further action against Local 1814 ILA AFL-CIO P.A.E.F with respect to the 2 U.S.C. § 441a(a)(2)(A) violation.

However, Local 1814 ILA AFL-CIO P.A.E.F. checked the wrong box by marking the general election box for a primary election contribution. The incorrect checking has now been corrected. Thus, we recommend that the Commission find reason to believe that Local 1814 ILA AFL-CIO P.A.E.F. violated 11 C.F.R. § 104.14(d), but take no further action.

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RECOMMENDATIONS

1. Take no further action against the American Federation of Labor-Congress of Industrial Organizations Committee on Political Education and Political Contributions Committee and its treasurer, Thomas R. Donahue, and the Political Education Fund of the Building and Construction Trades Department and its treasurer, Joseph F. Maloney with respect to 2 U.S.C. § 441a(a) (2) (A).
2. Find reason to believe that the Political Education Fund of the Building and Construction Trades Department and its treasurer, Joseph F. Maloney, violated 11 C.F.R. § 104.14(d), but take no further action.
3. Take no further action against Local 1814 International Longshoremans Association AFL-CIO Political Action and Education Fund, and its treasurer, Joseph Randazzo with respect to 2 U.S.C. § 441a(a) (2) (A).
4. Find reason to believe that the Local 1814 International Longshoremans Association AFL-CIO Political Action and Education Fund, and its treasurer, Joseph Randazzo violated 11 C.F.R. § 104.14(d), but take no further action.
5. Approve and authorize the sending of the attached letters.
6. Close the file.

Charles N. Steele
General Counsel

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Nov. 29, 1954
Date

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

Attachments:

1. Response from AFL-CIO COPE-PCC and P.E.F.-B.C.T.D.
2. Response from Local 1814 ILA AFL-CIO P.A.E.F.
3. Letters

American Federation of Labor and Congress of Industrial Organizations



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

EXECUTIVE COUNCIL

LANE KIRKLAND PRESIDENT	THOMAS R. DONAHUE SECRETARY-TREASURER
John H. Lyons S. Frank Raftery Glenn E. Watts Angelo Fosco Lloyd McBride Wm. W. Winpisinger Wayne E. Glenn John J. Sweeney Barbara Hutchinson Gerald W. McEntee Patrick J. Campbell	Thomas W. Gleason Murray H. Finley Sel C. Chaikin Charles H. Pillard Kenneth T. Blylock William H. Wynn Robert F. Goss Frank Drozak Richard I. Kilroy William H. Bywater Kenneth J. Brown
	Frederick O'Neal Albert Shanker Edward T. Hanley J. C. Turner Alvin E. Heaps John DeConcini Joyce D. Miller James E. Hatfield Vincent R. Sombrotto Marvin J. Boede Owen Bieber

ATTACHMENT I ①

July 31, 1984

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

RE: FEC MUR 1657

Dear Mr. Steele:

This letter constitutes the response of Thomas R. Donahue, the AFL-CIO Committee on Political Education Political Contributions Committee ("AFL-CIO COPE/PCC"), Joseph F. Maloney, and the Political Educational Fund of the Building and Construction Trades Department ("PEF-BCTD") (hereinafter "respondents") to the Commission's letter dated July 18, 1984, stating that the Commission has determined that there is "reason to believe" that respondents have violated 2 U.S.C. 441a(a)(2)(A) by contributing in the aggregate \$6,500 to the Committee To Re-Elect Congressman Leo C. Zeferetti ("Zeferetti Committee") for the 1982 general election.

As stated in our initial response in this matter (dated May 11, 1984) \$2,500 of the amount in question is attributable to a March 23, 1982 PEF-BCTD contribution made prior to Congressman Zeferetti's 1982 primary election. This contribution was reported as a general election contribution in PEF-BCTD's March 1982 FEC report. This report reflects the Committee's internal voucher which is marked "general election" (see attachment A). However, that voucher also shows that the \$2,500 contributed by PEF-BCTD was used to buy tickets to a fundraiser held by the Zeferetti Committee on March 25, 1982. The purpose of that fundraiser was to raise contributions for Congressman Zeferetti's 1982 primary election campaign. (See Zeferetti affidavit, attachment B.) Accordingly, most of the contributions made in the form of ticket purchases for that fundraiser, including PEF-BCTD's contribution, were treated by the Zeferetti Committee as primary contributions, were used for the primary election expenses, and were reported as primary election contributions on the Committee's FEC reports. In sum, notwithstanding that fact that PEF-BCTD's voucher and FEC report listed the Committee's March 23, 1982 contribution as being for the general election, that contribution in fact was used to buy tickets to a primary election fundraiser and was treated by the candidate who

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the primary election.*/

In light of the fact that PEF-BCTD's March 23, 1982 contribution was made prior to Congressman Zeferetti's primary election, was used to buy tickets to a fundraising event which the Zeferetti Committee held to raise funds for the Congressman's primary election campaign and was treated as a contribution for the primary election by the Zeferetti Committee and the fact that PEF-BCTD has amended its March 1982 FEC Report to designate that contribution for the 1982 primary election, respondents respectfully request that the Commission take no further action in this matter. Should the Commission decide to proceed further respondents request that this matter be handled through voluntary informal conciliation at this stage of the Commission's proceedings.

Sincerely,

Margaret E. McCormick

Margaret E. McCormick,
Counsel for Thomas R. Donahue
and AFL-CIO Committee On
Political Education Political
Contributions Committee

Robert D. Kurnick

Robert D. Kurnick,
Counsel for Joseph F. Maloney
and Political Educational Fund
of the Building and Construction
Trades Department

*/ As noted in our initial response, the AFL-CIO COPE/PCC recorded PEF-BCTD's March 23, 1982 contribution to the Zeferetti Committee in its internal contribution ledger as a contribution for the 1982 primary election and on that basis made two additional contributions in the amounts of \$2,500 and \$1,000 respectively to the Zeferetti Committee for the general election. Respondents can offer no explanation for the discrepancy between COPE/PCC's contribution ledger and PEF-BCTD's voucher for the March 23rd contribution. PEF-BCTD's normal practice prior to making any contribution is to notify COPE/PCC of the Committee's intention to contribute to a particular candidate and of the amount and for which election the contribution will be made. It is clear that this procedure was followed in the case of PEF-BCTD's March 23, 1982 contribution to the Zeferetti Committee. However, it is not clear why PEF-BCTD's voucher for that contribution is marked "general election" while COPE/PCC's internal contribution ledger has that contribution recorded as being for the primary election.

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PLEASE FILL OUT THE ENTIRE FORM BEFORE RETURNING IT TO PAM

Full Name of Candidate Leo C. Zeferretti

Primary Primary Deficit General General Deficit Campaign Yr. 82

Campaign Committee Committee to Re-Elect Leo Zeferretti

Address 11 Jamaica Walk C.D. 15th State New York

Breezy Point, NY Zip Code 11697 Amount of Check \$ 2,500

Treasurer Eileen Deering Particulars of Expenditure: Contribution
Tickets

*****Authorizing Signature***** *Rob*

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A reservation will be made for each contribution of \$500.00 to the Gala
Celebrity Reception for Congressman Leo C. Zeferetti to be held at La
Mer Caterers on Thursday, March 25, 1982.

Enclosed is my contribution of \$...2,500..... Please make
.....reservations for me..

I am unable to attend, but enclose a contribution of \$.....

NOTE: The Federal Election Campaign Act as amended requires that we report
the following information:

NAMEDaniel J. Mundy.....

ADDRESS ...7816 Hanover Parkway.....

CITY/STATE/ZIP ...Greenbelt, Md. 20770.....

PRINCIPAL PLACE OF BUSINESS ..815 16th St., NW, Wash. DC

Make checks payable to:
Committee to Re-elect Congressman Zeferetti—Eileen P. Deering, Treasurer

(A copy of our report is filed with the Federal Election Commission, Washington,
D. C. 20453).

NO CORPORATE CHECKS PERMITTED BY LAW
PERSONAL CHECKS, PLEASE  178

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

James Edward Antosh)
)
 Complainant,)
)
 v.)
)
 Leo C. Zeferetti; Committee to Re-elect)
 Congressman Leo C. Zeferetti; the American)
 Federation of Labor and Congress of Industrial)
 Organizations Committee on Political Education)
 Political Contributions Committee and its)
 affiliated separate segregated fund, the)
 Political Education Fund of the Building and)
 Construction Trades Department; Local 1814)
 International Longshoremen's Association)
 AFL-CIO Political Action & Education Fund,)
 and all the Committees' treasurers,)
)
 Respondents.)

MUR No. 1657

AFFIDAVIT OF LEO C. ZEFERETTI

DISTRICT OF COLUMBIA: ss

LEO C. ZEFERETTI, being first duly sworn, upon oath, deposes and says that:

1. In 1982 I was a Democratic candidate for Congress from the fourteenth congressional district of New York. I was a candidate in both the primary and general elections.

2. In approximately March of 1982 my campaign committee conducted a series of receptions in order to raise funds for the primary election campaign. These fundraising events included a reception on March 25, 1982 in Brooklyn, New York.

3. The Political Education Fund of the Building and Construction Trades Department purchased several tickets to that March 25 reception.

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4. That reception was conducted specifically to raise money for my primary election campaign. Most of the funds raised at that event, including the contribution made by the Political Education Fund, were reported to the Federal Election Commission as contributions for the primary campaign and were used for the primary campaign.

Further the affiant sayeth not.

Leo C. Zeferetti
Leo C. Zeferetti

Signed and sworn before me this 1st day of August 1984.

Richard A. Weiss
Notary Public

My Commission Expires July 31, 1985

84040493844

ATTACHMENT II ⑥
BOGUCKI, DI CHIARA & SCOTTO
ATTORNEYS AT LAW
26 COURT STREET
BROOKLYN, NEW YORK 11242

RECEIVED AT THE FEC
GCC#4344
84 AUG 16 AM: 58

ROBERT H. BOGUCKI
GERALD J. DICHIARA
ANTHONY THOMAS SCOTTO

TELEPHONE
(212) 875-7702
(212) 875-4904

TINA PELUSO

August 13, 1984

Certified Mail - RRR
Thomas E. Harris
Vice Chairman
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1657
Local 1814, ILA Political Action and
Education Fund

Dear Vice Chairman Harris:

This letter is submitted in response to your letter of July 18th and in accordance with an extension of time granted by the Office of General Counsel.

Please direct your attention to the Fund's report for the month of March, 1982, in which the Zeferetti contribution in question was reported. The one other contribution to a federal candidate reported on the itemized disbursement schedule for line 21 of the report is to the Re-Elect Congressman Schumer Committee. Please note that this contribution was specifically reported as having been made for the general election. The enclosed copy of the contribution to the Schumer Committee clearly indicates that the contribution is for the general election.

Unlike the contribution to the Schumer Committee, the March, 1982 contribution to the Zeferetti Committee, for tickets to a reception held on March 25, 1982, was not designated for either the general or primary election. (A copy of the March, 1982 contribution to the Zeferetti Committee is enclosed.) However, the contribution was noted on the Fund's report to the FEC as having been for the general election. We submit that due to a clerical error the Zeferetti contribution was reported incorrectly.

FEC regulation 11 CFR 110.2 (a) (1) provides that a contribution not designated in writing for a particular election shall be deemed made for a primary if made on or before the date of the election. The Zeferetti contribution, made prior to the September 22, 1982 primary elections, was not designated for a particular election. The Fund's records indicate this. Regrettably, the Zeferetti contribution was not reported in accordance with the Fund's records.

Yours truly,



Anthony Thomas Scotto

ATS/jm
Enclosures

84040493845

LOCAL 1814 POLITICAL ACTION
AND EDUCATION FUND
INTERNATIONAL LONGSHOREMEN'S ASSOC. AFL-CIO
343 COURT ST.
BROOKLYN, N.Y. 11231

No. 1741

1-337/210

March 29 19 82

PAY TO THE ORDER OF Re-elect Congressman Schumer Committee \$ 2,500.00

Two Thousand Five Hundred and no cents ----- DOLLARS

The Amalgamated Bank of New York
6187 11-15 UNION SQUARE NEW YORK, NEW YORK 10003



①026003379① 01004764①

LOCAL 1814 POLITICAL ACTION AND EDUCATION FUND
INTERNATIONAL LONGSHOREMEN'S ASSOC AFL-CIO

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN FULL PAYMENT OF ITEMS DESCRIBED
BELOW AND THE PAYEE ACCEPTS IT AS SUCH. NO RECEIPT REQUIRED.

DATE	DESCRIPTION	AMOUNT
3/29/82	Contribution 1718 East 26th Street Brooklyn; N.Y. 11229 Federal - House of Reps. - General	2,500.00

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LOCAL 1814 POLITICAL ACTION
AND EDUCATION FUND
INTERNATIONAL LONGSHOREMEN'S ASSOC. AFL-CIO
343 COURT ST.
BROOKLYN, N.Y. 11231

No 1733

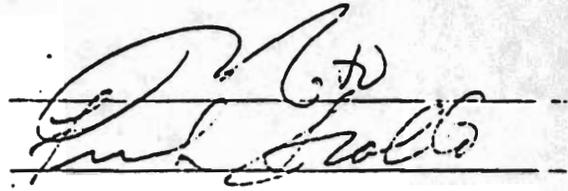
1-337/33

March 17 19 82

PAY TO THE ORDER OF Committee to Re-elect Congressman Zeferetti \$ 3,500.00

Three Thousand Five Hundred and no cents ----- DOLLARS

The Amalgamated Bank of New York
6187 11-15 UNION SQUARE NEW YORK, NEW YORK 10003



⑆026003379⑆ 01004764⑈

LOCAL 1814 POLITICAL ACT AND ED FUND
INTNL LONGSHOREMEN'S ASSOC AFL-CIO

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN FULL PAYMENT OF ITEMS DESCRIBED
BELOW AND THE PAYEE ACCEPTS IT AS SUCH. NO RECEIPT REQUIRED.

DATE	DESCRIPTION	AMOUNT
3/17/82	Seven tickets to the Gala Celebrity Reception for Congressman Leo C. Zeferetti Zeferetti Reception Fund c/o Eileen P. Deering 11 Jamaica Walk Breezy Point, New York 11697 House of Reps - FEDERAL -	3,500.00

4 0 4 0 4 9 3 8 4 7



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Margaret E. McCormick, Esquire
American Federation of Labor-Congress
of Industrial Organization Committee
915 16th Street, N.W.
Washington, D.C. 20006-4189

RE: MUR 1657
American Federation of Labor-Congress of
Industrial Organizations Committee on
Political Education and Political
Contributions Committee and Thomas R.
Donahue, as treasurer

Dear Ms. McCormick:

On July 10, 1984, the Commission found reason to believe that your client had violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file.

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

If you have any questions, please direct them to Martha Romney, 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
General Counsel's Report

84040493848



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert D. Kurnick, Esquire
Political Education Fund of the Building
and Construction Trades Department
815 16th Street, N.W., Suite 603
Washington, D.C. 20006-4189

RE: MUR 1657
Political Education Fund of the Building
and Construction Trades Department and
Joseph F. Maloney, as treasurer

Dear Mr. Kurnick:

The Commission in connection with the above referenced MUR found reason to believe on July 10, 1984, that your client had violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and on December , 1984, found reason to believe that your client had violated 11 C.F.R. § 104.14(d). However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file.

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

If you have any questions, please direct them to Martha Romney, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Anthony Thomas Scotto, Esquire
Bogucci, DeChiara & Scotto
26 Court Street
Brooklyn, New York 11424

RE: MUR 1657
Local 1814 International
Longshoremans Association AFL-CIO
Political Action and Education Fund
and Joseph Randazzo, as treasurer

Dear Mr. Scotto:

The Commission in connection with the above referenced MUR found reason to believe on July 10, 1984, that your client had violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and on December , 1984, found reason to believe that your client had violated 11 C.F.R. § 104.14(d). However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file.

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

If you have any questions, please direct them to Martha Romney, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Enclosure
General Counsel's Report

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(12)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Eileen P. Deering, Treasurer
Committee to Re-elect Congressman
Leo C. Zeferetti
11 Jamaica Walk
Breezy Point, New York 11692

RE: MUR 1657
Committee to Re-elect Congressman
Leo C. Zeferetti

Dear Ms. Deering:

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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 Martha Romney, 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
General Counsel's Report

cc: Leo C. Zeferetti



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 1657

Dear Mr. Avakian and Ms. Poindexter:

This is in reference to the complaint you filed with the Commission on March 30, 1984, concerning alleged excessive contributions accepted by the Committee to Re-elect Congressman Leo C. Zeferetti.

Based on your complaint, the Commission determined there was no reason to believe that the Committee to Re-elect Congressman Leo C. Zeferetti violated any provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Commission found there was reason to believe that the American Federation of Labor-Congress of Industrial Organizations Committee on Political Education and Political Contributions Committee, the Political Education Fund of the Building and Construction Trades Department and Local 1814 International Longshoremans Association AFL-CIO Political Action and Education Fund violated 2 U.S.C. § 441a(2)(A), a provision of the Act. The Commission also found reason to believe that the Political Education Fund of the Building and Construction Trades Department and Local 1814 International Longshoremans Association AFL-CIO Political Action and Education Fund violated 11 C.F.R. § 104.14(d). After an investigation was conducted, the Commission concluded on 1984, to take no further action in this matter. Accordingly, the file in this matter, numbered MUR 1657, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

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14

Michael Ernest Avakian, Esquire
Martha M. Poindexter, Esquire
Page 2

If you have any questions, please contact Martha Romney, 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
General Counsel's Report

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BOGUCKI, DI CHIARA & SCOTTO
ATTORNEYS AT LAW
26 COURT STREET
BROOKLYN, NEW YORK 11242

RECEIVED AT THE FEC
GCC#4344
84 AUG 16 AM: 58

ROBERT H. BOGUCKI
GERALD J. DI CHIARA
ANTHONY THOMAS SCOTTO

TELEPHONE
(212) 875-7782
(212) 875-4584

TINA PELUSO

August 13, 1984

Certified Mail - RRR
Thomas E. Harris
Vice Chairman
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1657
Local 1814, ILA Political Action and
Education Fund

Dear Vice Chairman Harris:

This letter is submitted in response to your letter of July 18th and in accordance with an extension of time granted by the Office of General Counsel.

Please direct your attention to the Fund's report for the month of March, 1982, in which the Zeferetti contribution in question was reported. The one other contribution to a federal candidate reported on the itemized disbursement schedule for line 21 of the report is to the Re-Elect Congressman Schumer Committee. Please note that this contribution was specifically reported as having been made for the general election. The enclosed copy of the contribution to the Schumer Committee clearly indicates that the contribution is for the general election.

Unlike the contribution to the Schumer Committee, the March, 1982 contribution to the Zeferetti Committee, for tickets to a reception held on March 25, 1982, was not designated for either the general or primary election. (A copy of the March, 1982 contribution to the Zeferetti Committee is enclosed.) However, the contribution was noted on the Fund's report to the FEC as having been for the general election. We submit that due to a clerical error the Zeferetti contribution was reported incorrectly.

FEC regulation 11 CFR 110.2 (a) (1) provides that a contribution not designated in writing for a particular election shall be deemed made for a primary if made on or before the date of the election. The Zeferetti contribution, made prior to the September 22, 1982 primary elections, was not designated for a particular election. The Fund's records indicate this. Regrettably, the Zeferetti contribution was not reported in accordance with the Fund's records.

Yours truly,



Anthony Thomas Scotto

ATS/jm
Enclosures

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AUG 16 P 2: 16



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463.

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cut*
DATE: June 20, 1984
SUBJECT: MUR 1657 - First General Counsel's Report

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

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

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SENSITIVE

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

84 JUN 20 A 9: 17

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL MUR 1657
BY OGC TO THE COMMISSION: DATE COMPLAINT RECEIVED BY OGC
6/20/84 - 4-30-84
9:15 DATE OF NOTIFICATION TO RESPONDENT:
4-30-84
STAFF MEMBER: Marty Romney

COMPLAINANT'S NAME: James Edward Antosh

RESPONDENTS' NAMES: Leo C. Zeferetti
Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer, Eileen P. Deering
American Federation of Labor-Congress of Industrial Organizations Committee on Political Education and Political Contributions Committee and its treasurer, Thomas R. Donahue
Political Education Fund of the Building and Construction Trades Department, and its treasurer, Joseph F. Maloney
Local 1814 International Longshoremans Association AFL-CIO Political Action and Education Fund and its treasurer, Joseph Randazzo

RELEVANT STATUTES: 2 U.S.C. §441a(a)(2)(A)
2 U.S.C. § 441a(f)
2 U.S.C. § 441a(a)(5)
11 C.F.R. § 110.1(a)(2)

INTERNAL REPORTS CHECKED: Reports submitted by respondent committees

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

1. Complainant alleges that the following political action committees violated 2 U.S.C. § 441a(a)(2)(A) by making excessive contributions to the Committee to Re-elect Congressman Leo C. Zeferetti (the "Zeferetti Committee") during the 1982 general election:

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- a) American Federation of Labor-Congress of Industrial Organization Committee on Political Education and Political Contributions Committee ("AFL-CIO COPE-PCC") and its affiliate Political Education Fund of the Building and Construction Trades Department ("P.E.F.-B.C.T.D.");
- b) Local 1814 International Longshoremans Association American Federation of Labor-Congress of Industrial Organizations Political Action and Education Fund, ("Local 1814 ILA AFL-CIO P.A.E.F.").

2. Complainant alleges that Leo C. Zeferetti and the Committee to Re-elect Congressman Leo C. Zeferetti ("the Zeferetti Committee") violated 2 U.S.C. § 441a(f) for the receipt of contributions in excess of limitations at 2 U.S.C. § 441a(a)(2)(A) from the above-named committees.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(2)(A) states that no multicandidate political committee shall make contributions to any candidate and his authorized political committees with respect to any federal election which in the aggregate, exceed \$5,000. 2 U.S.C. § 441a(f) prohibits receipt of contributions which violate this section.

2 U.S.C. § 441a(a)(5) makes it clear that for purposes of the contribution limits, all contributions made by political committees established by a union or any local of such union are considered to have been made by a single political committee.

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11 C.F.R. § 110.1(a)(2) 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 and for the general election if made after the date of the primary election.

Contributions of AFL-CIO COPE PCC & P.E.F.-B.C.T.D.

According to a complaint filed by James Edward Antosh, the Committee to Re-elect Congressman Leo C. Zeferetti received the following contributions for the 1982 federal general election totalling \$6,000, \$1,000 in excess of limitations at 2 U.S.C. § 441a(a)(2)(A):

<u>CONTRIBUTOR</u>	<u>AMOUNT</u>	<u>DATE REPORTED GIVEN</u>	<u>ELECTION REPORTED BY CONTRIBUTION</u>	<u>DATE REPORTED RECEIVED</u>	<u>ELECTION REPORTED BY RECIPIENT</u>
P.E.F.-B.C.T.D.	\$2,500	3/23/82	General	3/31/82	Primary
AFL-CIO COPE-PCC	\$2,500	9/21/82	General	10/17/82	General
AFL-CIO COPE-PCC	\$1,000	10/28/82	General	10/27/82	General
*P.E.F.-B.C.T.D.	\$ 500	2/10/83	General	3/4/83	General
Total	\$6,500				

Complainant asserts that a running total of the amount of contributions from AFL-CIO COPE-PCC and P.E.F.-B.C.T.D. would have put the Zeferetti Committee on notice that it had received \$5,000 by October 17, 1982. On that date, the Zeferetti Committee could no longer lawfully accept contributions from AFL-CIO COPE-PCC or P.E.F.-B.C.T.D. Complainant alleges that an additional \$1,000 contribution was accepted in violation of 2 U.S.C. § 441a(f).

*/ A review of reports filed with the Commission also reveals that this additional contribution was made.

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Furthermore, Complainant asserts that the Zeferetti Committee failed to accurately report the March 23, 1982, \$2,500 contribution. This contribution was reported by P.E.F.-B.C.T.D. as a contribution for the general election but reported by the Zeferetti Committee as a contribution for the primary election.

In response to the complaint, AFL-CIO COPE-PCC and P.E.F.-B.C.T.D. state that the Respondents' 1982 contribution records reflect that the \$2,500 contribution was contributed by the P.E.F.-B.C.T.D. on March 23, 1982, prior to the 1982 primary. Further, Respondents state that although P.E.F.-B.C.T.D. reported this amount in its FEC reports as a contribution for the general election, the AFL-CIO COPE-PCC recorded the P.E.F.-B.C.T.D. contribution as a contribution for the primary election in its internal contributions ledger. The internal contributions ledger was not submitted. On that basis AFL-CIO COPE-PCC made two additional contributions and P.E.F.-B.C.T.D. made one additional contribution for the 1982 general election to the Zeferetti Committee. P.E.F.-B.C.T.D. amended its March 1982 FEC report to designate the \$2,500 contribution for the primary election.

In response to the complaint, the candidate responds that records of the Zeferetti Committee correctly document that the contributions received from AFL-CIO COPE-PCC and P.E.F.-B.C.T.D. which totalled \$6,000 were allocated \$2,500 for the primary and \$3,500 for the general election, which would comply with the maximum ceiling of \$5,000 per election.

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The March 1982 contribution was made prior to the September 1982 primary election, but was designated by P.E.F.-B.C.T.D. in its reports filed with the Commission as being for the general election. Respondents have produced no contemporaneous evidence to substantiate that the March 23 \$2,500 contribution was for the primary election even though they mention an internal contribution ledger. Thus, it appears that AFL-CIO COPE PCC and P.E.F.-B.C.T.D. made contributions to the Zeferetti Committee in excess of the limitations at 2 U.S.C. § 441a(a) (2) (A). Accordingly, the Office of General Counsel recommends that the Commission find reason to believe the Zeferetti Committee violated 2 U.S.C. § 441a(f) and AFL-CIO COPE-PCC and P.E.F.-B.C.T.D. violated 2 U.S.C. § 441a(a) (2) (A).

Contributions Of Local 1814 ILA AFL-CIO P.A.E.F.

The Complainant also asserts that the Zeferetti Committee received contributions exceeding the limit of 2 U.S.C. § 441a(a) (2) (A) from Local 1814 ILA AFL-CIO P.A.E.F. The contributions made to the Zeferetti Committee from Local 1814 ILA AFL-CIO P.A.E.F. are as follows:

<u>CONTRIBUTOR</u>	<u>AMOUNT</u>	<u>DATE REPORTED GIVEN</u>	<u>ELECTION REPORTED BY CONTRIBUTION</u>	<u>DATE REPORTED RECEIVED</u>	<u>ELECTION REPORTED BY RECIPIENT</u>
Local 1814 AFL-CIO P.A.E.F.	\$3,500	3/17/82	General	3/25/82	Primary
Local 1814 ILA AFL-CIO P.A.E.F.	<u>\$5,000</u>	10/13/82	General	10/14/92	General
Total	\$8,500				

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Complainant asserts that a running total of the amount of contributions from Local 1814 ILA AFL-CIO P.A.E.F. would have put the Zeferetti Committee on notice that it had received \$3,500 in March 25, 1982, and was only permitted to accept an additional contribution of \$1,500. According to the Complainant, the Zeferetti Committee accepted an additional \$5,000 contribution, exceeding the statutory limit by \$3,500.

Furthermore, Complainant asserts that the Zeferetti Committee failed to accurately report the March 17, 1982, \$3,500 contribution. This contribution was reported by Local 1814 ILA AFL-CIO P.A.E.F. as a contribution for the general election. The Zeferetti Committee reported it as a contribution for the primary election.

In response to the complaint, Local 1814 ILA AFL-CIO P.A.E.F. states that on March 17, 1982, a \$3,500 contribution was made to the Zeferetti Committee. However, when the contribution was reported in the monthly report filed on April 15, 1982, Local 1814 ILA AFL-CIO P.A.E.F. states that it erroneously checked the general election box. The check stub submitted with the response indicates that the \$3,500 was for seven tickets to the Gala Celebrity Reception for Congressman Leo C. Zeferetti. No further information was provided about the reception, however. On October 13, 1982, a \$5,000 contribution was made to the Zeferetti Committee. This contribution was intended for the general election and the general election box was checked in the report. Local 1814 ILA AFL-CIO P.A.E.F. further states that as

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the March 1982 contribution was made prior to the primary election, it should be considered a primary contribution.

In response to the complaint, the Zeferetti Committee responds that its records correctly document that the contributions received from Local 1814 ILA AFL-CIO P.A.E.F., which totaled \$8,500, were allocated \$3,500 for the primary and \$5,000 for the general election.

The \$3,500 March 1982 contribution was made prior to the September 1982 primary election. However, Local 1814 ILA AFL-CIO P.A.E.F. in its report designated this contribution for the general election. Thus, Local 1814 ILA AFL-CIO P.A.E.F. made contributions to the Zeferetti Committee in excess of the limitations at 2 U.S.C. § 441a(a)(2)(A). Accordingly, the Office of General Counsel recommends that the Commission find reason to believe the Zeferetti Committee violated 2 U.S.C. § 441a(f) and Local 1814 ILA AFL-CIO P.A.E.F. violated 2 U.S.C. § 441a(a)(2)(A).

RECOMMENDATIONS

1. Find reason to believe that the American Federation of Labor-Congress of Industrial Organization Committee on Political Education and Political Contributions Committee and its treasurer, Thomas R. Donahue, violated 2 U.S.C. § 441a(a)(2)(A) by making an excessive contribution to the Committee to Re-Elect Congressman Leo C. Zeferetti.

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2. Find reason to believe that the Political Education Fund of the Building and Construction Trades Department and its treasurer, Joseph F. Maloney, violated 2 U.S.C.

§ 441a(a)(2)(A) by making an excessive contribution to the Committee to Re-Elect Congressman Leo C. Zeferetti.

3. Find reason to believe that the Committee to Re-Elect Congressman Leo C. Zeferetti and its treasurer, Eileen P. Deering violated 2 U.S.C. § 441a(f) by accepting excessive contributions from American Federation of Labor-Congress of Industrial Organization Committee on Political Education and Political Contributions Committee and the Political Education Fund of the Building and Construction Trades Department.

4. Find reason to believe that Local 1814 International Longshoremans Association AFL-CIO Political Action & Education Fund, and its treasurer, Joseph Randazzo, violated 2 U.S.C. § 441a(a)(2)(A) by making an excessive contribution to the Committee to Re-Elect Congressman Leo C. Zeferetti.

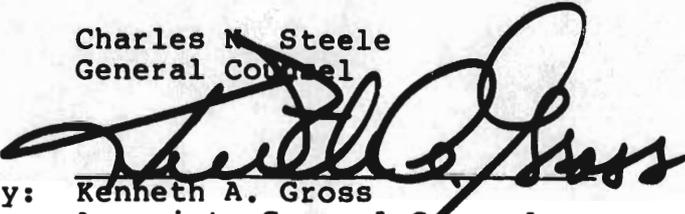
5. Find reason to believe that the Committee to Re-Elect Congressman Leo C. Zeferetti and its treasurer, Eileen P. Deering violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from Local 1814 International Longshoremans Association AFL-CIO Political Action & Education Fund.

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6. Approve and authorize the sending of the attached letters.

Charles N. Steele
General Counsel

June 18, 1984
Date


By: Kenneth A. Gross
Associate General Counsel

Attachments

1. Response from Zeferetti Committee
2. Response from AFL-CIO COPE-PCC and P.E.F.-B.C.T.D.
3. Response from Local 1814 ILA AFL-CIO P.A.E.F.
4. Letters

84040493864

Attachment I

THE FEC
GCC# 2281
94 APR 27 AIO: 10

APR 27 11:00

April 19, 1984

Federal Election Commission
Washington, DC 20463

Attn: Kenneth A. Gross

Re: MUR 1657
Committee to Re-Elect
Congressman Zeferetti

Dear Mr. Gross:

In regard to the complaints made in the above mentioned documents, my records indicate that:

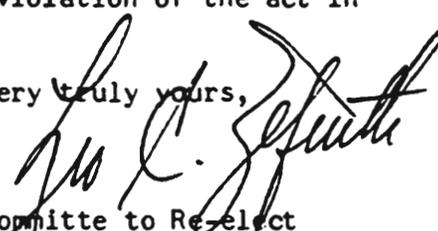
1) Contributions received from AFL-CIO COPE-PCC AND PEF-BCTD which totaled \$6,000 were allocated \$2,500 for the primary and \$3,500 for the general election which would comply with the maximum ceiling of \$5,000 per election.

and

2) Contributions received from Local 1814 ILA-AFL-CIO PAEF which totaled \$8,500 were allocated \$3,500 for the primary and \$5,000 for the general election which would comply with the maximum ceiling of \$5,000 per election.

Therefore, according to my records we are not in violation of the act in regards to receiving excess contributions.

Very truly yours,


Committee to Re-elect
Congressman Leo C. Zeferetti

84040493865

SCHEDULE A

ITEMIZED RECEIPTS

2

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

Name of Committee (in Full)

Committee To Re-Elect Congressman Leo C. Zeferetti

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Dist. 2 MEBA PAC John F. Brady 650 4th Avenue Brooklyn, NY 11232		3/25/82	\$500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$500.00	
B. Full Name, Mailing Address and ZIP Code Int'l Union of Operating Engineers PAC - 265 W. 14th Street New York, NY 10011		3/31/82	\$500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$500.00	
C. Full Name, Mailing Address and ZIP Code Bldg. & Construction Trades PAC 7816 Hanover Pkwy. Greenbelt, Maryland 20770		3/31/82	\$2500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$2500.00	
D. Full Name, Mailing Address and ZIP Code Chemical Bank PAC 277 Park Avenue - 17th Floor New York, New York 10172		3/30/82	\$150.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$150.00	
E. Full Name, Mailing Address and ZIP Code General Dynamics PAC 8801 Bel Air Place Potomac Falls, MD 20854		3/30/82	\$150.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$150.00	
F. Full Name, Mailing Address and ZIP Code Chain Drug Stores PAC 1600 Cortland Road Alexandria, VA 22306		3/31/82	\$150.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$150.00	
G. Full Name, Mailing Address and ZIP Code Federal Express PAC Suite 1100 1015 18th Street NW Washington, DC		3/30/82	\$150.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$150.00	

SUBTOTAL of Receipts This Page (optional) \$4100.00

TOTAL This Period (last page this line number only)

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SCHEDULE A

ITEMIZED RECEIPT

3

Page 1 of 2 for
 LINE NUMBER 11C
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

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

Name of Committee (in Full)

Committee To Re-Elect Congressman Leo C. Zeferetti

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Retail Wholesale Dept. Stores Union AFL/CIO Cope Acct. 101 W. 31st Street New York, New York 10001		3/25/82	\$1000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date—\$ 1000.00
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Brotherhood of Railway & Airline Clerks PAC 94 Franklin Avenue Valhalla, NY 10595		3/25/82	\$1000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date—\$ 1000.00
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Machinest Non Partisan Gen'l Fund 1300 Connecticut Avenue N.W. Washington, D.C. 20036		3/25/82	\$500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date—\$ 500.00
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Seafarers Int. PAC 675 4th Avenue Brooklyn, NY 11232		3/25/82	\$2500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date—\$ 2500.00
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date—\$
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
United Technologies PAC 1125 15th Street N.W. Suite 500 Washington, DC 20005		3/25/82	\$300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date—\$ 300.00
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Local 1814 ILA PAC 343 Court Street Brooklyn, NY 11231		3/25/82	\$3500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date—\$ 3500.00
SUBTOTAL of Receipts This Page (optional)			\$8,800.00
TOTAL This Period (last page this line number only)			

G C C H 2135

American Federation of Labor and Congress of Industrial Organizations



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

EXECUTIVE COUNCIL

LANE KIRKLAND PRESIDENT

THOMAS R. DONAHUE SECRETARY-TREASURER

John H. Lyons
S. Frank Rattery
Glenn E. Watts
Angelo Fosco
Lloyd McBride
Wm. W. Winpisinger
Wayne E. Glenn
John J. Sweeney
Barbara Hutchinson
Gerald W. McEntee
Patrick J. Campbell

Thomas W. Gleason
Murray H. Finley
Sol C. Chaikin
Charles H. Pillard
Kenneth T. Blaylock
William H. Wynn
Robert F. Goss
Frank Drozak
Richard I. Kilroy
William H. Bywater
Kenneth J. Brown

Frederick O'Neal
Albert Shanker
Edward T. Hanley
J. C. Turner
Alvin E. Heape
John DeConcini
Joyce D. Miller
James E. Hatfield
Vincent R. Sombrotto
Marvin J. Boede
Owen Bieber

Attachment II (4)

May 11, 1984

*MUR 1657 =
Demouget*
11:17
10:3:17

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

Re: FEC MUR 1657

Dear Mr. Steele:

This letter constitutes the response of Thomas R. Donahue, the AFL-CIO Committee on Political Education Political Contributions Committee ("COPE-PCC"), Joseph F. Maloney, and the Political Educational Fund of the Building and Construction Trades Department ("PEF-BCTD") (hereinafter "respondents") to your letter dated April 5, 1984 stating that the Commission has received a complaint alleging that respondents may have violated the Federal Election Campaign Act of 1971, as amended ("the Act").

The complaint, which the Commission has numbered MUR 1657, alleges that respondents violated §441a(a)(2)(A) of the Act by making contributions totalling \$6,000 to the Committee to Re-Elect Congressman Zeferetti ("Zeferetti Committee") for the 1982 general election.

Respondents' 1982 contribution records reflect that \$2,500 of the \$6,000 which the complaint alleges was contributed for the general election, was contributed by the PEF-BCTD on March 23, 1982, prior to the 1982 primary. Although PEF-BCTD reported this amount as a contribution for the general election, the Zeferetti Committee, as shown by its report to the Commission, concluded that the contribution was made for the primary election. The AFL-CIO COPE PCC also recorded the PEF-BCTD contribution as a contribution for the primary election in its internal contributions ledger and on that basis made two additional contributions in the amounts of \$2,500 and \$1,000 respectively to the Zeferetti Committee for the general election. Subsequently, PEF-BCTD contributed \$500 for the Zeferetti Committee's 1982 general election deficit on 2/10/83.

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In light of the fact that PEF-BCTD's March 23, 1982 contribution was given prior to the primary election and was accepted by the candidate as a contribution for that election, PEF-BCTD has amended its March 1982 FEC report to designate that contribution for the primary and thus accurately reflect the manner in which the contribution was treated by the candidate. A copy of that amendment is attached hereto.

Since this matter involves a discrepancy between reports of PEF-BCTD and the candidate committee, and since that discrepancy has been corrected, respondents respectfully request that the Commission take no further action in this matter. Should the Commission decide to proceed further, respondents request that this matter be handled through voluntary informal conciliation at this stage in the Commission's proceedings.

Sincerely,

Margaret E. McCormick

Margaret E. McCormick
Counsel for respondents
Thomas R. Donahue and AFL-CIO
COPE-PCC

Robert D. Kurnick

Robert D. Kurnick
Counsel for respondents
Joseph F. Maloney and PEF-BCTD

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REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)
 Political Educational Fund of the
 Building & Construction Trades Department

Address (Number and Street)

815 16th Street, N.W., Suite 603

City, State and ZIP Code

Washington, D.C. 20006

Check here if address is different than previously reported.

2. FEC Identification Number

C 0000 3160

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

4. TYPE OF REPORT (Check appropriate boxes)

(a) April 15 Quarterly Report October 15 Quarterly Report

July 15 Quarterly Report January 31 Year End Report

July 31 Mid Year Report (Non-Election Year Only)

Monthly Report for March 1982

Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

Thirtieth day report following the General Election

on _____ in the State of _____

Termination Report

(b) Is this Report an Amendment?

YES NO

SUMMARY

5. Covering Period 3/1/82 through 3/31/82

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

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1B)

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

7. Total Disbursements (from Line 2B)

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

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

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

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

		\$ 82,664.23
\$	75,642.96	
\$	274.69	\$ 953.42
\$	75,917.65	\$ 83,617.65
\$	16,200.00	\$ 23,900.00
\$	59,717.65	\$ 59,717.65
\$		
\$		

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

Joseph F. Maloney

Type or Print Name of Treasurer

Joseph F. Maloney

SIGNATURE OF TREASURER

May 7, 1984

Date

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4068

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

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

FEC FORM 3X (3/80)

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7

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

Name of Committee (in Full)

Political Educational Fund of the Building and Construction Trades Department

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Dorgan for Congress Committee P.O. Box 6238, N.W. Station Washington, D.C. 20015 Walter Fiedler, Treasurer	Tickets Byron L. Dorgan, ND at lg Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/23/82	500.00
B. Full Name, Mailing Address and ZIP Code Committee to Re-Elect Congressman Zeferetti 11 Jamaica Walk Breezy Point, NJ 11697 Eileen Deering, Treasurer	Tickets Leo Zeferetti, 15, NY Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/23/82	2,500.00
C. Full Name, Mailing Address and ZIP Code Democratic Congressional Dinner Committee P.O. Box 2884 Washington, D.C. 20013 Aidan Kirwan, Treasurer	Tickets Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/30/82	2,000.00
D. Full Name, Mailing Address and ZIP Code Re-Elect Hollenbeck to Congress Committee P.O. Box 2671 Washington, D.C. 20013 Michael Missal, Treasurer	Tickets Harold Hollenbeck, 9, NJ Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/30/82	200.00
E. Full Name, Mailing Address and ZIP Code Fithian for U.S. Senate 1911 Rhode Island Avenue McLean, VA 22101 William G. Davis, Treasurer	Tickets Floyd Fithian, 2, IN Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/30/82	500.00
F. Full Name, Mailing Address and ZIP Code Jerry Apodaca for U.S. Senate Comm. c/o Isabelle Tapia 5113 Chowan Avenue Alexandria, VA 22312 Dorothy I. Cline, Treasurer	Tickets Jerry Apodaca, NM Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/30/82	100.00
G. Full Name, Mailing Address and ZIP Code Friends of Tom Bevill P.O. Box 1453 Jasper, Alabama 35501 Dick Wright, Treasurer	Tickets Tom Bevill, 4, AL Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/30/82	250.00
H. Full Name, Mailing Address and ZIP Code Parren J. Mitchell Campaign Comm. P.O. Box 9047 Washington, D.C. 20003 Anthony Robinson, Treasurer	Tickets Parren J. Mitchell, 7, MD Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/30/82	100.00
I. Full Name, Mailing Address and ZIP Code Young for Congress Committee P.O. Box 23286 Washington, D.C. 20004 Clarence G. Tremeyer, Treasurer	Tickets Robert A. Young, 2, MO Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/30/82	500.00
SUBTOTAL of Disbursements This Page (optional)			6,650.00
TOTAL This Period (last page this line number only)			

7
3
3
4
0
4
0
4
0
3

Attachment III (B)
BOGUCKI, DI CHIARA & SCOTTO

ATTORNEYS AT LAW

26 COURT STREET

BROOKLYN, NEW YORK 11242

Call 2255
04 APR 24 12:34

ROBERT H. BOGUCKI
GERALD J. DI CHIARA
ANTHONY THOMAS SCOTTO

TELEPHONE
(212) 875-7762
(212) 875-4864

TINA PELUSO

MUR 1657
Nemougeat

APR 24 11:29

April 16, 1984

Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1657

Dear Mr. Steele:

We represent 1814, International Longshoremen's Association, AFL-CIO Political Action and Education Fund (1814) in the above-numbered matter. (See enclosed Designation of Counsel.)

A review of the facts in connection with the contributions to the 1982 campaigns of Congressman Leo C. Zeferetti indicate the following:

1. On March 17, 1982 a contribution of \$3,500 was made to the Committee to Re-elect Congressman Zeferetti. (See attached Exhibit "A.")

This contribution was not designated for either the primary or general election. However, when the contribution was reported in the monthly report filed on April 15, 1982, the general election box designation was marked in error.

2. On October 13, 1982 a contribution of \$5,000 was made to the Committee to Re-elect Congressman Zeferetti. (See attached Exhibit "B.")

This contribution is clearly marked and intended for the general election.

It is submitted that the March, 1982 contribution, clearly not

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designated for a particular election but made prior to September, 1982 primary, must be regarded as made for the primary election. That being the case, 1814 is not in violation of the Federal Election Campaign Act.

If you have any questions, please call me.

Yours truly,



Anthony Thomas Scotto

ATS/jm

Enclosures

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LOCAL 1014 POLITICAL ACTION
AND EDUCATION FUND
INTERNATIONAL LONGSHOREMEN'S ASSOC. AFL-CIO
343 COURT ST.
BROOKLYN, N.Y. 11231

No. 1733

1-337/240

March 17 19 82

PAY TO THE ORDER OF Committee to Re-elect Congressman Zeferetti \$ 3,500.00

Three Thousand Five Hundred and no cents ----- DOLLARS

The Amalgamated Bank of New York
6187 11-15 UNION SQUARE NEW YORK, NEW YORK 10003

Paul Gold

⑆026003379⑆ 01004764⑈

LOC 1014 POLITICAL ACT AND ED FUND
INTNL LONGSHOREMEN'S ASSOC AFL-CIO

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN FULL PAYMENT OF ITEMS DESCRIBED
BELOW AND THE PAYEE ACCEPTS IT AS SUCH. NO RECEIPT REQUIRED.

DATE	DESCRIPTION	AMOUNT
3/17/82	Seven tickets to the Gala Celebrity Reception for Congressman Leo C. Zeferetti Zeferetti Reception Fund c/o Eileen P. Deering 11 Jamaica Walk Breezy Point, New York 11697 House of Reps - FEDERAL -	3,500.00

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LOCAL 1814 POLITICAL ACTION
AND EDUCATION FUND
INTERNATIONAL LONGSHOREMEN'S ASSOC. AFL-CIO
343 COURT ST.
BROOKLYN, N.Y. 11231

No. 2072
1-33770

October 13 1982

PAY TO THE ORDER OF Committee to Re-elect Congressman Zeferetti \$ 5,000.00
Five Thousand and no cents-----
DOLLARS

The Amalgamated Bank of New York
LTD. 5187 11-15 UNION SQUARE NEW YORK, NEW YORK 10003

[Handwritten signature]
cc: *[Handwritten initials]*

⑆026003379⑆ 01004764⑆

LOCAL POLITICAL ACTION AND EDUCATION FUND
INTERNATIONAL LONGSHOREMEN'S ASSOC. AFL-CIO

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN FULL PAYMENT OF ITEMS DESCRIBED
BELOW AND THE PAYEE ACCEPTS IT AS SUCH. NO RECEIPT REQUIRED.

DATE	DESCRIPTION	AMOUNT
10/13/82	contribution 155 Lamport Blvd. Staten Island, New York 10305 Federal - General	5,000.00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Eileen P. Deering, Treasurer
Committee to Re-Elect Congressman Leo C. Zeferetti
11 Jamaica Walk
Breezy Point, New York 11692

RE: MUR 1657
Committee to Re-Elect
Congressman Leo C. Zeferetti

Dear Ms. Deering:

On April 5, 1984, the Commission notified the Committee to Re-Elect Congressman Leo C. Zeferetti and you, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was forwarded to you at that time. We acknowledge receipt of Leo C. Zeferetti's explanation of this matter which was dated April 19, 1984.

Upon further review of the allegations contained in the complaint and information supplied by Mr. Zeferetti, the Commission, on , 1984, determined that there is reason to believe that the Committee to Re-Elect Congressman Leo C. Zeferetti and you, as treasurer, have violated 2 U.S.C. § 441a(f), a provision of the Act. Specifically, the Commission found that you accepted contributions for the 1982 federal general election from the American Federation on Labor-Congress of Industrial Organizations Committee on Political Education and Political Contributions Committee and from the Political Education Fund of the Building and Construction Trades Department in the amount of \$6,500, which is \$1,500 in excess of the limitations at 2 U.S.C. § 441a(a)(2)(A). Also, the Commission found that you accepted contributions for the 1982 federal general election from Local 1814 International Longshoremans Association AFL-CIO Political Action and Education Fund in the amount of \$8,500, which is \$3,500 in excess of the limitations at 2 U.S.C. § 441a(a)(2)(A).

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. If you have any contemporaneous evidence which would show that

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13

Eileen P. Deering, Treasurer
Page 2

the March 23, 1982, contribution from the Political Education Fund of the Building and Construction Trades Department is designated for the primary election, please submit it.

If you have any contemporaneous evidence which would show that the March 17, 1982, contribution from Local 1814 International Longshoremans Association Fund is for the primary election, please submit it. It appears that this contribution may have been for tickets to a reception for Congressman Leo C. Zeferetti. When was this reception held and what was its purpose? 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 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.

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 client wishes the matter to be made public. If you have any questions, please contact Marty Romney, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures
Procedures

84040493877



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

14

Margaret E. McCormick, Esquire
American Federation of Labor-Congress of Industrial
Organizations Committee on Political Education and
Political Contributions Committee
915 16th Street, N.W.
Washington, D.C. 20006-4189

RE: MUR 1657
American Federation of
Labor-Congress of Industrial
Organizations Committee on
Political Education and
Political Contributions
Committee

Dear Ms. McCormick:

On April 5, 1984, the Commission notified your client of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was forwarded to your client at that time. We acknowledge receipt of your explanation of this matter which was dated May 11, 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 your clients violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, the Commission found that the American Federation on Labor-Congress of Industrial Organizations Committee on Political Education and Political Contributions Committee contributed \$6,500 for the 1982 general election to the Committee to Re-Elect Congressman Leo C. Zeferetti which is \$1,500 in excess of the contribution limitations.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. If you have any contemporaneous evidence which would show that the March 23, 1982, contribution which you made to the Zeferetti Committee is for the primary election, please submit it. Please submit any such response within ten days of your receipt of this notification.

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15

Margaret E. McCormick, Esquire
Page 2

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 client, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

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

Sincerely,

Enclosures
Procedures

84040493879



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

16

Robert D. Kurnick, Esquire
Political Education Fund of the Building
and Construction Trades Department
815 16th Street, N.W., Suite 603
Washington, D.C. 20006-4189

RE: MUR 1657
Political Education Fund of
the Building and Construction
Trades Department

Dear Mr. Kurnick:

On April 5, 1984, the Commission notified your client of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was forwarded to your client at that time. We acknowledge receipt of your explanation of this matter which was dated May 11, 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 your clients violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, the Commission found that the American Federation on Labor-Congress of Industrial Organizations Committee on Political Education and Political Contributions Committee contributed \$6,500 for the 1982 general election to the Committee to Re-Elect Congressman Leo C. Zeferetti which is \$1,500 in excess of the contribution limitations.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. If you have any contemporaneous evidence which would show that the March 23, 1982, contribution which you made to the Zeferetti Committee is for the primary election, please submit it. Please submit any such response within ten days of your receipt of this notification.

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Robert D. Kurnick, Esquire
Page 2

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 client, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

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

Sincerely,

Enclosures
Procedures

8404049388



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

18

Anthony Thomas Scotto, Esquire
Bogucci, DeChiara & Scotto
26 Court Street
Brooklyn, New York 11424

RE: MUR 1657
Local 1814, International
Longshoremans Association,
AFL-CIO Political Action
Education Fund

Dear Mr. Scotto:

On April 5, 1984, the Commission notified the Local 1814, International Longshoremans Association, AFL-CIO Political Action Education Fund and you, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was forwarded to your client at that time. We acknowledge receipt of your 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 your client violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, the Commission found that Local 1814, International Longshoremans Association, AFL-CIO Political Action Education Fund contributed \$8,500 for the 1982 general election to the Committee to Re-Elect Congressman Leo C. Zeferetti, which is \$3,500 in excess of the contribution limitations.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. If you have any contemporaneous evidence which would show that the March 17, 1982, contribution which you made to the Zeferetti Committee is for the primary election, please submit it. It appears that this contribution may have been for tickets to a reception for Congressman Leo C. Zeferetti. When was this reception held and what was its purpose? Please submit any such response within ten days of your receipt of this notification.

84040493892

Anthony Thomas Scotto, Esquire
Page 2

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.

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 client wishes the matter to be made public. If you have any questions, please contact Marty Romney, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures
Procedures

84040493883

GCC #4233

American Federation of Labor and Congress of Industrial Organizations



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

EXECUTIVE COUNCIL

LANE KIRKLAND PRESIDENT	THOMAS R. DONAHUE SECRETARY-TREASURER
John H. Lyons S. Frank Raftery Glenn E. Watts Angelo Fosco Lloyd McBride Wm. W. Winplinger Wayne E. Glenn John J. Sweeney Barbara Hutchinson Gerald W. McEntee Patrick J. Campbell	Thomas W. Gleason Murray H. Finley Sol C. Chaikin Charles H. Piffard Kenneth T. Blaylock William H. Wynn Robert F. Goss Frank Drozak Richard I. Kilroy William H. Bywater Kenneth J. Brown
	Frederick O'Neal Albert Shanker Edward T. Hanley J. C. Turner Alvin E. Heaps John DeConcini Joyce D. Miller James E. Hatfield Vincent R. Sombrotto Marvin J. Boede Owen Bieber

July 31, 1984

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

RE: FEC MUR 1657

Dear Mr. Steele:

This letter constitutes the response of Thomas R. Donahue, the AFL-CIO Committee on Political Education Political Contributions Committee ("AFL-CIO COPE/PCC"), Joseph F. Maloney, and the Political Educational Fund of the Building and Construction Trades Department ("PEF-BCTD") (hereinafter "respondents") to the Commission's letter dated July 18, 1984, stating that the Commission has determined that there is "reason to believe" that respondents have violated 2 U.S.C. 441a(a)(2)(A) by contributing in the aggregate \$6,500 to the Committee To Re-Elect Congressman Leo C. Zeferetti ("Zeferetti Committee") for the 1982 general election.

As stated in our initial response in this matter (dated May 11, 1984) \$2,500 of the amount in question is attributable to a March 23, 1982 PEF-BCTD contribution made prior to Congressman Zeferetti's 1982 primary election. This contribution was reported as a general election contribution in PEF-BCTD's March 1982 FEC report. This report reflects the Committee's internal voucher which is marked "general election" (see attachment A). However, that voucher also shows that the \$2,500 contributed by PEF-BCTD was used to buy tickets to a fundraiser held by the Zeferetti Committee on March 25, 1982. The purpose of that fundraiser was to raise contributions for Congressman Zeferetti's 1982 primary election campaign. (See Zeferetti affidavit, attachment B.) Accordingly, most of the contributions made in the form of ticket purchases for that fundraiser, including PEF-BCTD's contribution, were treated by the Zeferetti Committee as primary contributions, were used for the primary election expenses, and were reported as primary election contributions on the Committee's FEC reports. In sum, notwithstanding that fact that PEF-BCTD's voucher and FEC report listed the Committee's March 23, 1982 contribution as being for the general election, that contribution in fact was used to buy tickets to a primary election fundraiser and was treated by the candidate who

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AUG 1 1984

the primary election.*/

In light of the fact that PEF-BCTD's March 23, 1982 contribution was made prior to Congressman Zeferetti's primary election, was used to buy tickets to a fundraising event which the Zeferetti Committee held to raise funds for the Congressman's primary election campaign and was treated as a contribution for the primary election by the Zeferetti Committee and the fact that PEF-BCTD has amended its March 1982 FEC Report to designate that contribution for the 1982 primary election, respondents respectfully request that the Commission take no further action in this matter. Should the Commission decide to proceed further respondents request that this matter be handled through voluntary informal conciliation at this stage of the Commission's proceedings.

Sincerely,

Margaret E. McCormick

Margaret E. McCormick,
Counsel for Thomas R. Donahue
and AFL-CIO Committee On
Political Education Political
Contributions Committee

Robert D. Kurnick

Robert D. Kurnick,
Counsel for Joseph F. Maloney
and Political Educational Fund
of the Building and Construction
Trades Department

*/ As noted in our initial response, the AFL-CIO COPE/PCC recorded PEF-BCTD's March 23, 1982 contribution to the Zeferetti Committee in its internal contribution ledger as a contribution for the 1982 primary election and on that basis made two additional contributions in the amounts of \$2,500 and \$1,000 respectively to the Zeferetti Committee for the general election. Respondents can offer no explanation for the discrepancy between COPE/PCC's contribution ledger and PEF-BCTD's voucher for the March 23rd contribution. PEF-BCTD's normal practice prior to making any contribution is to notify COPE/PCC of the Committee's intention to contribute to a particular candidate and of the amount and for which election the contribution will be made. It is clear that this procedure was followed in the case of PEF-BCTD's March 23, 1982 contribution to the Zeferetti Committee. However, it is not clear why PEF-BCTD's voucher for that contribution is marked "general election" while COPE/PCC's internal contribution ledger has that contribution recorded as being for the primary election.

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PLEASE FILL OUT THE ENTIRE FORM BEFORE RETURNING IT TO PAM

Full Name of Candidate Leo C. Zeferretti

Primary Primary Deficit General General Deficit Campaign Yr. 82

Campaign Committee Committee to Re-Elect Leo Zeferretti

Address 11 Jamaica Walk C.D. 15th State New York

Breezy Point, NY Zip Code 11697 Amount of Check \$ 2,500

Treasurer Eileen Deering Particulars of Expenditure: Contribution
Tickets

*****Authorizing Signature***** *Rob*

84040493086

A reservation will be made for each contribution of \$500.00 to the Gala
Celebrity Reception for Congressman Leo C. Zeferetti to be held at La
Mer Caterers on Thursday, March 25, 1982.

Enclosed is my contribution of \$...2,500..... Please make
.....reservations for me.

I am unable to attend, but enclose a contribution of \$.....

NOTE: The Federal Election Campaign Act as amended requires that we report
the following information:

NAMEDaniel J. Mundy.....

ADDRESS ...7816 Hanover Parkway.....

CITY/STATE/ZIP ...Greenbelt, Md. 20770.....

PRINCIPAL PLACE OF BUSINESS ..815 16th St., NW, Wash. DC

Make checks payable to:

Committee to Re-elect Congressman Zeferetti—Eileen P. Deering, Treasurer

(A copy of our report is filed with the Federal Election Commission, Washington,
D. C. 20453).

NO CORPORATE CHECKS PERMITTED BY LAW
PERSONAL CHECKS, PLEASE

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

James Edward Antosh)
)
 Complainant,)

v.)

Leo C. Zeferetti; Committee to Re-elect)
Congressman Leo C. Zeferetti; the American)
Federation of Labor and Congress of Industrial)
Organizations Committee on Political Education)
Political Contributions Committee and its)
affiliated separate segregated fund, the)
Political Education Fund of the Building and)
Construction Trades Department; Local 1814)
International Longshoremen's Association)
AFL-CIO Political Action & Education Fund,)
and all the Committees' treasurers,)

MUR No. 1657

Respondents.)

AFFIDAVIT OF LEO C. ZEFERETTI

DISTRICT OF COLUMBIA: ss

LEO C. ZEFERETTI, being first duly sworn, upon oath, deposes and says that:

1. In 1982 I was a Democratic candidate for Congress from the fourteenth congressional district of New York. I was a candidate in both the primary and general elections.

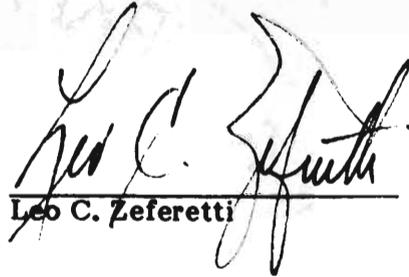
2. In approximately March of 1982 my campaign committee conducted a series of receptions in order to raise funds for the primary election campaign. These fundraising events included a reception on March 25, 1982 in Brooklyn, New York.

3. The Political Education Fund of the Building and Construction Trades Department purchased several tickets to that March 25 reception.

84040493887

4. That reception was conducted specifically to raise money for my primary election campaign. Most of the funds raised at that event, including the contribution made by the Political Education Fund, were reported to the Federal Election Commission as contributions for the primary campaign and were used for the primary campaign.

Further the affiant sayeth not.


Leo C. Zeferetti

Signed and sworn before me this 1st day of August 1984.


Notary Public

My Commission Expires July 31, 1986

84040493888

BOGUCKI, DI CHIARA & SCOTTO

ATTORNEYS AT LAW

26 COURT STREET

BROOKLYN, NEW YORK 11242

ROBERT H. BOGUCKI
GERALD J. DICHIARA
ANTHONY THOMAS SCOTTO

TINA PELUSO

84 JUL 30 P 1: 09

TELEPHONE
(212) 878-7762
(212) 878-4664

July 27, 1984

Marty Romney
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1657
Local 1814, International Longshoremen's
Association, AFL-CIO Political Action
Education Fund

Dear Ms. Romney:

Reference is made to a letter, dated July 18, 1984, from Thomas E. Harris, Vice Chairman, to Anthony Thomas Scotto, Esq., a member of this firm, with respect to the above-captioned matter.

Mr. Harris's letter requests that certain information be furnished to your office within ten days of receipt of the July 18th notification. However, Mr. Scotto is on vacation for two weeks, and I would, therefore, request that our office be granted an extension of time until August 15, 1984, within which to reply.

I endeavored to reach you by telephone on this date, but was advised that you would not return to the office until July 30.

If there is any difficulty in granting the extension of time within which to reply, until August 15, 1984, would you please advise this office immediately?

Sincerely,

BOGUCKI, DICHIARA & SCOTTO

By: 
Robert H. Bogucki

RHB/jm

84040493889



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 2, 1984

Robert H. Bogucki, Esquire
Bogucki, DiChiara & Scotto
26 Court Street
Brooklyn, New York 11242

Re: MUR 1657
Local 1814, ILA, AFL-CIO PAEF

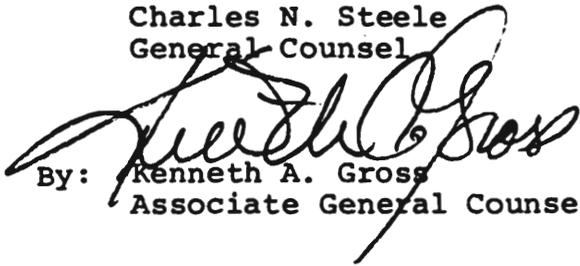
Dear Mr. Bogucki:

This is to inform you that the Office of General Counsel has determined to grant you your requested extension until August 15, 1984, in which to submit a response on behalf of Local 1814, International Longshoremans Association, AFL-CIO Political Action Education Fund, in the above referenced matter.

If you have any questions, please direct them to Martha Romney, the staff member assigned to this matter at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

84040493890

6-CC-4198
RECEIVED AT THE FEC

BOGUCKI, DI CHIARA & SCOTTO
ATTORNEYS AT LAW
26 COURT STREET
BROOKLYN, NEW YORK 11242

84 JUL 30 P 1: 00

ROBERT H. BOGUCKI
GERALD J. DI CHIARA
ANTHONY THOMAS SCOTTO

TELEPHONE
(212) 876-7792
(212) 876-4664

TINA PELUSO

July 27, 1984

Marty Romney
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1657
Local 1814, International Longshoremans
Association, AFL-CIO Political Action
Education Fund

Dear Ms. Romney:

Reference is made to a letter, dated July 18, 1984, from Thomas E. Harris, Vice Chairman, to Anthony Thomas Scotto, Esq., a member of this firm, with respect to the above-captioned matter.

Mr. Harris's letter requests that certain information be furnished to your office within ten days of receipt of the July 18th notification. However, Mr. Scotto is on vacation for two weeks, and I would, therefore, request that our office be granted an extension of time until August 15, 1984, within which to reply.

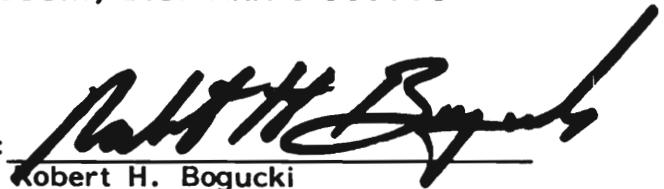
I endeavored to reach you by telephone on this date, but was advised that you would not return to the office until July 30.

If there is any difficulty in granting the extension of time within which to reply until August 15, 1984, would you please advise this office immediately?

Sincerely,

BOGUCKI, DiCHIARA & SCOTTO

By:


Robert H. Bogucki

RHB/jm

84040493891

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee to Re-elect) MUR 1657
Congressman Leo C.)
Zeferetti, et al.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of July 10, 1984, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1657:

1. Find reason to believe that the American Federation of Labor-Congress of Industrial Organization Committee on Political Education and Political Contributions Committee and its treasurer, Thomas R. Donahue, violated 2 U.S.C. § 441a(a)(2)(A) by making an excessive contribution to the Committee to Re-elect Congressman Leo C. Zeferetti.
2. Find reason to believe that the Political Education Fund of the Building and Construction Trades Department and its treasurer, Joseph F. Maloney, violated 2 U.S.C. § 441a(a)(2)(A) by making an excessive contribution to the Committee to Re-Elect Congressman Leo C. Zeferetti.

(Continued)

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- 84040493893
3. Find no reason to believe that the Committee to Re-Elect Congressman Leo C. Zeferetti and its treasurer, Eileen P. Deering violated 2 U.S.C. § 441a(f) by accepting excessive contributions from American Federation of Labor-Congress of Industrial Organization Committee on Political Education and Political Contributions Committee and the Political Education Fund of the Building and Construction Trades Department.
 4. Find reason to believe that Local 1814 International Longshoremans Association AFL-CIO Political Action & Education Fund, and its treasurer, Joseph Randazzo, violated 2 U.S.C. § 441a(a)(2)(A) by making an excessive contribution to the Committee to Re-Elect Congressman Leo C. Zeferetti.
 5. Find no reason to believe that the Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer, Eileen P. Deering violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from Local 1814 International Longshoremans Association AFL-CIO Political Action & Education Fund.
 6. Direct the General Counsel to send appropriate letters pursuant to the actions taken this date.

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

Attest:

7-12-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 18, 1984

Eileen P. Deering, Treasurer
Committee to Re-Elect Congressman Leo O. Zeferetti
11 Jamaica Walk
Breezy Point, New York 11692

Re: MUR 1657
Committee to Re-Elect Congressman
Leo C. Zeferetti

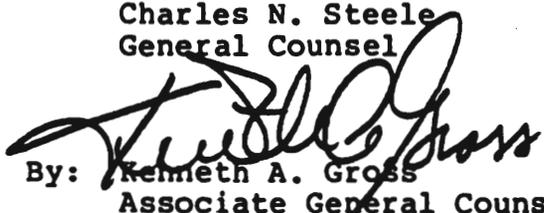
Dear Ms. Deering:

On April 5, 1984, the Commission notified the Committee to Re-Elect Congressman Leo C. Zeferetti and you, as treasurer of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on July 10, 1984, determined that on the basis of the information in the complaint and information provided by Mr. Zeferetti, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosures
Procedure

cc: Congressman Leo C. Zeferetti

84040493694



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 18, 1984

Anthony Thomas Scotto, Esquire
Bogucci, DeChiara & Scotto
26 Court Street
Brooklyn, New York 11424

RE: MUR 1657
Local 1814, International
Longshoremans Association,
AFL-CIO Political Action
Education Fund

Dear Mr. Scotto:

On April 5, 1984, the Commission notified the Local 1814, International Longshoremans Association, AFL-CIO Political Action Education Fund and you, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was forwarded to your client at that time. We acknowledge receipt of your 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 July 10, 1984, determined that there is reason to believe that your client violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, the Commission found that Local 1814, International Longshoremans Association, AFL-CIO Political Action Education Fund contributed \$8,500 for the 1982 general election to the Committee to Re-Elect Congressman Leo C. Zeferetti, which is \$3,500 in excess of the contribution limitations.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. If you have any contemporaneous evidence which would show that the March 17, 1982, contribution which you made to the Zeferetti Committee is for the primary election, please submit it. It appears that this contribution may have been for tickets to a reception for Congressman Leo C. Zeferetti. When was this reception held and what was its purpose? Please submit any such response within ten days of your receipt of this notification.

84040493895

Anthony Thomas Scotto, Esquire
Page 2

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.

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 client wishes the matter to be made public. If you have any questions, please contact Marty Romney, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Thomas E. Harris

Thomas E. Harris
Vice Chairman

Enclosures
Procedures

84040493896



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 18, 1984

Robert D. Kurnick, Esquire
Political Education Fund of the Building
and Construction Trades Department
815 16th Street, N.W., Suite 603
Washington, D.C. 20006-4189

RE: MUR 1657
Political Education Fund of
the Building and Construction
Trades Department

Dear Mr. Kurnick:

On April 5, 1984, the Commission notified your client of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was forwarded to your client at that time. We acknowledge receipt of your explanation of this matter which was dated May 11, 1984.

Upon further review of the allegations contained in the complaint and information supplied by you the Commission, on July 10, 1984, determined that there is reason to believe that your clients violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, the Commission found that the American Federation on Labor-Congress of Industrial Organizations Committee on Political Education and Political Contributions Committee contributed \$6,500 for the 1982 general election to the Committee to Re-Elect Congressman Leo C. Zeferetti which is \$1,500 in excess of the contribution limitations.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. If you have any contemporaneous evidence which would show that the March 23, 1982, contribution which you made to the Zeferetti Committee is for the primary election, please submit it. Please submit any such response within ten days of your receipt of this notification.

84040493897

Robert D. Kurnick, Esquire
Page 2

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 client, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

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

Sincerely,

Thomas E. Harris

Thomas E. Harris
Vice Chairman

Enclosures
Procedures

84040493898



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 18, 1984

Margaret E. McCormick, Esquire
American Federation of Labor-Congress of Industrial
Organizations Committee on Political Education and
Political Contributions Committee
915 16th Street, N.W.
Washington, D.C. 20006-4189

RE: MUR 1657
American Federation of
Labor-Congress of Industrial
Organizations Committee on
Political Education and
Political Contributions
Committee

Dear Ms. McCormick:

On April 5, 1984, the Commission notified your client of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was forwarded to your client at that time. We acknowledge receipt of your explanation of this matter which was dated May 11, 1984.

Upon further review of the allegations contained in the complaint and information supplied by you the Commission, on July 10, 1984, determined that there is reason to believe that your clients violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, the Commission found that the American Federation on Labor-Congress of Industrial Organizations Committee on Political Education and Political Contributions Committee contributed \$6,500 for the 1982 general election to the Committee to Re-Elect Congressman Leo C. Zeferetti which is \$1,500 in excess of the contribution limitations.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. If you have any contemporaneous evidence which would show that the March 23, 1982, contribution which you made to the Zeferetti Committee is for the primary election, please submit it. Please submit any such response within ten days of your receipt of this notification.

84040493899

Margaret E. McCormick, Esquire
Page 2

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 client, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

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

Sincerely,

Thomas E. Harris

Thomas E. Harris
Vice Chairman

Enclosures
Procedures

84040493900

LOCAL 1814 POLITICAL ACTION
AND EDUCATION FUND
INTERNATIONAL LONGSHOREMEN'S ASSOC. AFL-CIO
343 COURT ST.
BROOKLYN, N.Y. 11231

No 1733

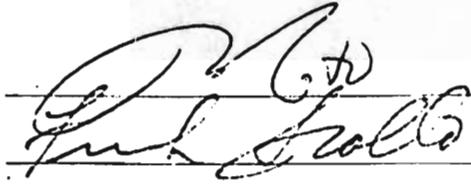
1-337/260

March 17 1982

PAY TO THE ORDER OF Committee to Re-elect Congressman Zeferetti \$ 3,500.00

Three Thousand Five Hundred and no cents ----- DOLLARS

The Amalgamated Bank of New York
11-16 UNION SQUARE NEW YORK, NEW YORK 10003



⑆026003379⑆ 01004764⑈

LOC 1814 POLITICAL ACT AND ED FUND
INTNL. LONGSHOREMEN'S ASSOC AFL-CIO

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN FULL PAYMENT OF ITEMS DESCRIBED
BELOW AND THE PAYEE ACCEPTS IT AS SUCH. NO RECEIPT REQUIRED.

DATE	DESCRIPTION	AMOUNT
03/17/82	Seven tickets to the Gala Celebrity Reception for Congressman Leo C. Zeferetti Zeferetti Reception Fund c/o Eileen P. Deering 11 Jamaica Walk Breezy Point, New York 11697 House of Reps - FEDERAL -	3,500.00

404049390

LOCAL 1814 POLITICAL ACTION
AND EDUCATION FUND
INTERNATIONAL LONGSHOREMEN'S ASSOC. AFL-CIO
343 COURT ST.
BROOKLYN, N.Y. 11231

No 1741

1-337/240

March 29 19 82

PAY TO THE ORDER OF Re-elect Congressman Schumer Committee \$ 2,500.00

Two Thousand Five Hundred and no cents ----- DOLLARS

The Amalgamated Bank of New York
8187 11-15 UNION SQUARE NEW YORK, NEW YORK 10003



⑆026003379⑆ 01004764⑈

LOC 1814 POLITICAL ACT AND ED FUND
INTNL LONGSHOREMEN'S ASSOC AFL-CIO

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN FULL PAYMENT OF ITEMS DESCRIBED
BELOW AND THE PAYEE ACCEPTS IT AS SUCH. NO RECEIPT REQUIRED.

DATE	DESCRIPTION	AMOUNT
3/29/82	Contribution 1718 East 26th Street Brooklyn, N.Y. 11229 Federal - House of Reps. - General	2,500.00

4040493902



600# 3135

American Federation of Labor and Congress of Industrial Organizations



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

EXECUTIVE COUNCIL

LANE KIRKLAND PRESIDENT

John H. Lyons
B. Frank Raftery
Glenn E. Watts
Angelo Fosco
Lloyd McBride
Wm. W. Winplinger
Wayne E. Glenn
John J. Sweeney
Barbara Hutchinson
Gerald W. McEntee
Patrick J. Campbell

THOMAS R. DONAHUE

Thomas W. Gleason
Murray H. Finley
Sol C. Chelkin
Charles H. Pillard
Kenneth T. Blaylock
William H. Wynn
Robert F. Goss
Frank Drozak
Richard I. Kilroy
William H. Bywater
Kenneth J. Brown

SECRETARY-TREASURER

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Edward T. Hanley
J. C. Turner
Alvin E. Heaps
John DeConcini
Joyce D. Miller
James E. Hatfield
Vincent R. Sombrotto
Marvin J. Boede
Owen Bieber

May 11, 1984

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

94 MAY 11 2 3: 17
RECEIVED
GENERAL COUNSEL

Re: FEC MUR 1657

Dear Mr. Steele:

This letter constitutes the response of Thomas R. Donahue, the AFL-CIO Committee on Political Education Political Contributions Committee ("COPE-PCC"), Joseph F. Maloney, and the Political Educational Fund of the Building and Construction Trades Department ("PEF-BCTD") (hereinafter "respondents") to your letter dated April 5, 1984 stating that the Commission has received a complaint alleging that respondents may have violated the Federal Election Campaign Act of 1971, as amended ("the Act").

The complaint, which the Commission has numbered MUR 1657, alleges that respondents violated §441a(a)(2)(A) of the Act by making contributions totalling \$6,000 to the Committee to Re-Elect Congressman Zeferetti ("Zeferetti Committee") for the 1982 general election.

Respondents' 1982 contribution records reflect that \$2,500 of the \$6,000 which the complaint alleges was contributed for the general election, was contributed by the PEF-BCTD on March 23, 1982, prior to the 1982 primary. Although PEF-BCTD reported this amount as a contribution for the general election, the Zeferetti Committee, as shown by its report to the Commission, concluded that the contribution was made for the primary election. The AFL-CIO COPE PCC also recorded the PEF-BCTD contribution as a contribution for the primary election in its internal contributions ledger and on that basis made two additional contributions in the amounts of \$2,500 and \$1,000 respectively to the Zeferetti Committee for the general election. Subsequently, PEF-BCTD contributed \$500 for the Zeferetti Committee's 1982 general election deficit on 2/10/83.

84060493903

In light of the fact that PEF-BCTD's March 23, 1982 contribution was given prior to the primary election and was accepted by the candidate as a contribution for that election, PEF-BCTD has amended its March 1982 FEC report to designate that contribution for the primary and thus accurately reflect the manner in which the contribution was treated by the candidate. A copy of that amendment is attached hereto.

Since this matter involves a discrepancy between reports of PEF-BCTD and the candidate committee, and since that discrepancy has been corrected, respondents respectfully request that the Commission take no further action in this matter. Should the Commission decide to proceed further, respondents request that this matter be handled through voluntary informal conciliation at this stage in the Commission's proceedings.

Sincerely,

Margaret E. McCormick

Margaret E. McCormick
Counsel for respondents
Thomas R. Donahue and AFL-CIO
COPE-PCC

Robert D. Kurnick

Robert D. Kurnick
Counsel for respondents
Joseph F. Maloney and PEF-BCTD

84040493904

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

(Summary Page)

<p>ALIGN AREA</p> <p>1. Name of Committee (In Full) Political Educational Fund of the Building & Construction Trades Department</p> <hr/> <p>Address (Number and Street) 815 16th Street, N.W., Suite 603</p> <hr/> <p>City, State and ZIP Code Washington, D.C. 20006</p> <hr/> <p><input type="checkbox"/> Check here if address is different than previously reported.</p> <p>2. FEC Identification Number C 0000 3160</p> <hr/> <p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)</p>	<p>ALIGN AREA</p> <p>4. TYPE OF REPORT (Check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non-Election Year Only) <input checked="" type="checkbox"/> Monthly Report for <u>March 1982</u> <input type="checkbox"/> Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____ <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____ <input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p>
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SUMMARY

5. Covering Period 3/1/82 through 3/31/82

6. (a) Cash on hand January 1, 1982

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

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

7. Total Disbursements (from Line 28)

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

9. Debts and Obligations Owed TO The Committee

(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee

(Itemize all on Schedule C or Schedule D)

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
		\$ 82,664.23
	\$ 75,642.96	
	\$ 274.69	\$ 953.42
	\$ 75,917.65	\$ 83,617.65
	\$ 16,200.00	\$ 23,900.00
	\$ 59,717.65	\$ 59,717.65
	\$	
	\$	

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

Joseph F. Maloney
Type or Print Name of Treasurer

Joseph F. Maloney
SIGNATURE OF TREASURER

May 7, 1984
Date

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

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

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

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FEC FORM 3X (3/80)

84040493903

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

Name of Committee (in Full)

Political Educational Fund of the Building and Construction Trades Department

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Dorgan for Congress Committee P.O. Box 6238, N.W. Station Washington, D.C. 20015 Walter Fiedler, Treasurer	Tickets Byron L. Dorgan, ND at lg Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/23/82	500.00
Committee to Re-Elect Congressman Zeferetti 11 Jamaica Walk Breezy Point, NJ 11697 Eileen Deering, Treasurer	Tickets Leo Zeferetti, 15, NY Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/23/82	2,500.00
Democratic Congressional Dinner Committee P.O. Box 2884 Washington, D.C. 20013 Aidan Kirwan, Treasurer	Tickets Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/30/82	2,000.00
Re-Elect Hollenbeck to Congress Committee P.O. Box 2671 Washington, D.C. 20013 Michael Missal, Treasurer	Tickets Harold Hollenbeck, 9, NJ Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/30/82	200.00
Fithian for U.S. Senate 1911 Rhode Island Avenue McLean, VA 22101 William G. Davis, Treasurer	Tickets Floyd Fithian, 2, IN Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/30/82	500.00
Jerry Apodaca for U.S. Senate Comm. c/o Isabelle Tapia 5113 Chowan Avenue Alexandria, VA 22312 Dorothy I. Cline, Treasurer	Tickets Jerry Apodaca, NM Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/30/82	100.00
Friends of Tom Bevill P.O. Box 1453 Jasper, Alabama 35501 Dick Wright, Treasurer	Tickets Tom Bevill, 4, AL Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/30/82	250.00
Parren J. Mitchell Campaign Comm. P.O. Box 9047 Washington, D.C. 20003 Anthony Robinson, Treasurer	Tickets Parren J. Mitchell, 7, MD Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/30/82	100.00
Young for Congress Committee P.O. Box 23286 Washington, D.C. 20004 Clarence G. Tremeyer, Treasurer	Tickets Robert A. Young, 2, MO Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/30/82	500.00
SUBTOTAL of Disbursements This Page (optional)			6,650.00
TOTAL This Period (last page this line number only)			

84040493906



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 25, 1984

Margaret E. McCormick, Esquire
AFL-CIO Committee on Political Education
Political Contributions Committee
815 Sixteenth Street, N.W.
Washington, D.C. 20006

Re: MUR 1657

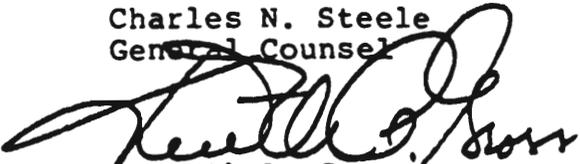
Dear Ms. McCormick:

Your letter of April 16, 1984, has been received. In this letter you have requested an extension of time of three weeks in which to respond to the complaint filed in the above-cited matter.

Due to the circumstances cited in your letter, you have been granted the extension, making your response due on or before May 11, 1984.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

84040493907

GCC# 2157

American Federation of Labor and Congress of Industrial Organizations



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

EXECUTIVE COUNCIL

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	Frederick O'Neal Albert Shanker Edward T. Hanley J. C. Turner Arvin E. Heaps John DeConcini Joyce D. Miller James E. Hatfield Vincent R. Sombrotto Marvin J. Boede Owen Bieber

April 16, 1984

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

*MUR 1657
Demougeot*

1117 P2:50

Re: FEC MUR 1657

Dear Mr. Steele:

The purpose of this letter is to request an extension of time from April 21, 1984 until May 11, 1984, for respondents Thomas R. Donahue and AFL-CIO Committee on Political Education Political Contributions Committee (hereinafter "respondents") to respond to the complaint in the above-referenced matter.

The reason for this request is that due to a longstanding commitment I must be out of the city on business for most of the next two weeks and will therefore be unable to do the necessary preparation to respond to the complaint in this matter and that in FEC MUR 1655, which is due on the same date, without the requested extension.

Accordingly, I respectfully request an extension of time in which to file the reply of respondents Thomas R. Donahue and AFL-CIO COPE Political Contributions Committee from April 21, 1984 until May 11, 1984.

Respectfully,

Margaret E. McCormick

Margaret E. McCormick
Counsel for Thomas R. Donahue and
AFL-CIO COPE Political Contributions
Committee

84040493908

BOGUCKI, DI CHIARA & SCOTTO
ATTORNEYS AT LAW
26 COURT STREET
BROOKLYN, NEW YORK 11242

ROBERT M. BOGUCKI
GERALD J. DI CHIARA
ANTHONY THOMAS SCOTTO

TINA PELUSO

TELEPHONE
(212) 878-7762
(212) 878-4864

Cath
04 APR 24 12:34
2255

MUR 1657
Demougeat

24
P 1:29

April 16, 1984

Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1657

Dear Mr. Steele:

We represent 1814, International Longshoremen's Association, AFL-CIO Political Action and Education Fund (1814) in the above-numbered matter. (See enclosed Designation of Counsel.)

A review of the facts in connection with the contributions to the 1982 campaigns of Congressman Leo C. Zeferetti indicate the following:

1. On March 17, 1982 a contribution of \$3,500 was made to the Committee to Re-elect Congressman Zeferetti. (See attached Exhibit "A.")

This contribution was not designated for either the primary or general election. However, when the contribution was reported in the monthly report filed on April 15, 1982, the general election box designation was marked in error.

2. On October 13, 1982 a contribution of \$5,000 was made to the Committee to Re-elect Congressman Zeferetti. (See attached Exhibit "B.")

This contribution is clearly marked and intended for the general election.

It is submitted that the March, 1982 contribution, clearly not

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designated for a particular election but made prior to September, 1982 primary, must be regarded as made for the primary election. That being the case, 1814 is not in violation of the Federal Election Campaign Act.

If you have any questions, please call me.

Yours truly,



Anthony Thomas Scotto

ATS/jm

Enclosures

84040495910

STATEMENT OF DESIGNATION OF COUNSEL

Re: MUR 1657

NAME OF COUNSEL: **BOGUCKI, DI CHIARA & SCOTTO**

ADDRESS: 26 Court Street
Brooklyn, New York 11242

TELEPHONE: (212) 875-7762

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

4-17-84

Date

Joseph Randazzo
Signature

NAME: Joseph Randazzo, Treasurer
Local 1814 International Longshoremen's Association AFL-CIO Political Action &
ADDRESS: Education Fund

343 Court Street
Brooklyn, New York 11231
HOME PHONE

BUSINESS PHONE: (212) 834-7800

184040493911

LOCAL 1814 POLITICAL ACTION
AND EDUCATION FUND
INTERNATIONAL LONGSHOREMEN'S ASSOC. AFL-CIO
343 COURT ST.
BROOKLYN, N.Y. 11231

No 1733

1-337/260

March 17 19 82

PAY TO THE ORDER OF Committee to Re-elect Congressman Zeferetti \$ 3,500.00

Three Thousand Five Hundred and no cents----- DOLLARS

The Amalgamated Bank of New York
11-15 UNION SQUARE NEW YORK, NEW YORK 10003

[Handwritten Signature]

⑆026003379⑆ 01004764⑈

LOG 1814 POLITICAL ACT AND ED FUND
INTNL. LONGSHOREMEN'S ASSOC AFL-CIO

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN FULL PAYMENT OF ITEMS DESCRIBED
BELOW AND THE PAYEE ACCEPTS IT AS SUCH. NO RECEIPT REQUIRED.

DATE	DESCRIPTION	AMOUNT
3/17/82	<p>Seven tickets to the Gala Celebrity Reception for Congressman Leo C. Zeferetti</p> <p>Zefere.ti Reception Fund c/o Eileen P. Deering 11 Jamaica Walk Breezy Point, New York 11697</p> <p>House of Reps - FEDERAL -</p>	3,500.00

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LOCAL UNION POLITICAL ACTION
 AND EDUCATION FUND
 INTERNATIONAL LONGSHOREMEN'S ASSOC. AFL-CIO
 343 COURT ST.
 BROOKLYN, N.Y. 11231

1-337-19

October 13 1982

PAY TO THE ORDER OF Committee to Re-elect Congressman Zeferetti \$ 5,000.00
 Five Thousand and no cents-----
 ----- DOLLARS

The Inalgramated Bank of New York
 E.E.O.C. 5187 11-15 UNION SQUARE NEW YORK, NEW YORK 10003

[Handwritten signature]

⑆026003379⑆ 01004764⑈

LOCAL UNION POLITICAL ACTION AND EDUCATION FUND
 INTERNATIONAL LONGSHOREMEN'S ASSOCIATION AFL-CIO

DETACH AND RETAIN THIS STATEMENT
 THE ATTACHED CHECK IS IN FULL PAYMENT OF ITEMS DESCRIBED
 BELOW AND THE PAYEE ACCEPTS IT AS SUCH. NO RECEIPT REQUIRED.

DATE	DESCRIPTION	AMOUNT
10/13/82	contribution 155 Lamport Blvd. Staten Island, New York 10305 Federal - General	5,000.00

3
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RECEIVED AT THE FCC
GCC# 2281
84 APR 27 A10:10

APR 27 11:00

April 19, 1984

Federal Election Commission
Washington, DC 20463

Attn: Kenneth A. Gross

Re: MUR 1657
Committee to Re-Elect
Congressman Zeferetti

Dear Mr. Gross:

In regard to the complaints made in the above mentioned documents, my records indicate that:

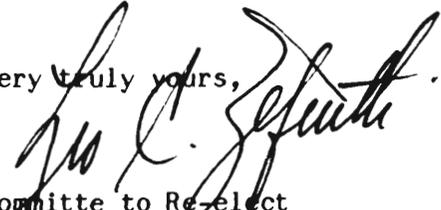
1) Contributions received from AFL-CIO COPE-PCC AND PEF-BCTD which totaled \$6,000 were allocated \$2,500 for the primary and \$3,500 for the general election which would comply with the maximum ceiling of \$5,000 per election.

and

2) Contributions received from Local 1814 ILA-AFL-CIO PAEF which totaled \$8,500 were allocated \$3,500 for the primary and \$5,000 for the general election which would comply with the maximum ceiling of \$5,000 per election.

Therefore, according to my records we are not in violation of the act in regards to receiving excess contributions.

Very truly yours,



Committee to Re-elect
Congressman Leo C. Zeferetti

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SCHEDULE A

ITEMIZED RECEIPTS

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

Name of Committee (in Full)			
Committee To Re-Elect Congressman Leo C. Zeferetti			
A. Full Name, Mailing Address and ZIP Code Dist. 2 MEBA PAC John F. Brady 650 4th Avenue Brooklyn, NY 11232	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation	3/25/82	\$500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$500.00		
B. Full Name, Mailing Address and ZIP Code Int'l Union of Operating Engineers PAC - 265 W. 14th Street New York, NY 10011	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	3/31/82	\$500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$500.00		
C. Full Name, Mailing Address and ZIP Code Bldg. & Construction Trades PAC 7816 Hanover Pkwy. Greenbelt, Maryland 20770	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	3/31/82	\$2500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$2500.00		
D. Full Name, Mailing Address and ZIP Code Chemical Bank PAC 277 Park Avenue - 17th Floor New York, New York 10172	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	3/30/82	\$150.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 150.00		
E. Full Name, Mailing Address and ZIP Code General Dynamics PAC 8801 Bel Air Place Potomac Falls, MD 20854	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	3/30/82	\$150.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$150.00		
F. Full Name, Mailing Address and ZIP Code Chain Drug Stores PAC 1600 Cortland Road Alexandria, VA 22306	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	3/31/82	\$150.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$150.00		
G. Full Name, Mailing Address and ZIP Code Federal Express PAC Suite 1100 1015 18th Street NW Washington, DC	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	3/30/82	\$150.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$150.00		
SUBTOTAL of Receipts This Page (optional)			\$4100.00
TOTAL This Period (last page this line number only)			

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SCHEDULE A

ITEMIZED RECEIPTS

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

Name of Committee (in Full)
Committee To Re-Elect Congressman Leo C. Zeferetti

84040493916

A. Full Name, Mailing Address and ZIP Code Retail Wholesale Dept. Stores Union AFL/CIO Cope Acct. 101 W. 31st Street New York, New York 10001	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period \$1000.00
	Occupation	3/25/82	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 1000.00		

B. Full Name, Mailing Address and ZIP Code Brotherhood of Railway & Airline Clerks PAC 94 Franklin Avenue Valhalla, NY 10595	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$1000.00
	Occupation	3/25/82	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 1000.00		

C. Full Name, Mailing Address and ZIP Code Machinest Non Partisan Gen'l Fund 1300 Connecticut Avenue N.W. Washington, D.C. 20036	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$500.00
	Occupation	3/25/82	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 500.00		

D. Full Name, Mailing Address and ZIP Code Seafarers Int. PAC 675 4th Avenue Brooklyn, NY 11232	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$2500.00
	Occupation	3/25/82	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 2500.00		

E. Full Name, Mailing Address and ZIP Code (Empty)	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		

F. Full Name, Mailing Address and ZIP Code United Technologies PAC 1125 15th Street N.W. Suite 500 Washington, DC 20005	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$300.00
	Occupation	3/25/82	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 300.00		

G. Full Name, Mailing Address and ZIP Code Local 1814 ILA PAC 343 Court Street Brooklyn, NY 11231	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$3500.00
	Occupation	3/25/82	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 3500.00		

SUBTOTAL of Receipts This Page (optional) \$8,800.00

TOTAL This Period (last page this line number only)

STATEMENT OF DESIGNATION OF COUNSEL

Re: MUR 1657

NAME OF COUNSEL: BOGUCKI, DI CHIARA & SCOTTO

ADDRESS: 26 Court Street
Brooklyn, New York 11242

TELEPHONE: (212) 875-7762

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

4-17-84

Date

Joseph Randazzo
Signature

NAME: Joseph Randazzo, Treasurer
Local 1814 International Longshoremen's Association AFL-CIO Political Action &
ADDRESS: Education Fund

343 Court Street
Brooklyn, New York 11231

HOME PHONE

BUSINESS PHONE: (212) 834-7800

84040493917

LAW OFFICES

84 APR 23 8:54

600 # 2034

SHERMAN, DUNN, COHEN, LEIFER & COUNTS, P. C.

1125 FIFTEENTH STREET, N. W.
SUITE 801
WASHINGTON, D. C. 20005

LOUIS SHERMAN (RET.)
THOMAS X. DUNN (RET.)
LAURENCE J. COHEN
ELIHU I. LEIFER
JOHN P. COUNTS
TERRY R. YELLIG
RICHARD M. RESNICK
ROBERT D. KURNICK
VICTORIA L. BOR
D. WILLIAM HEINE, JR.
MARY E. VOGEL

AREA CODE 202
785-9300

April 20, 1984

Demougeot
MUR 1655
MUR 1657

MEMBER OF CALIFORNIA BAR

Mr. George Demougeot
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20465

Re: FEC MUR 1655
FEC MUR 1657

Dear Mr. Demougeot:

I am enclosing statements of Designation of Counsel on behalf of Joseph F. Maloney and the Political Education Fund of the Building and Construction Trades Department.

Thank you for your assistance in this matter.

Sincerely,

SHERMAN, DUNN, COHEN, LEIFER & COUNTS, P.C.

Robert D. Kurnick
Robert D. Kurnick

RDK:ljl

Enclosures

84040493918

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1657

NAME OF COUNSEL: Robert D. Kurnick, Esquire

ADDRESS: Sherman, Dunn, Cohen, Leifer & Counts
1125 - 15th Street, N.W. Suite 801
Washington, D.C. 20005

TELEPHONE: (202) 785-9300

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

April 6, 1984
Date

Joseph F. Maloney
Signature

RESPONDENT'S NAME: Joseph F. Maloney, Sec.-Treas.

ADDRESS: Building & Construction Trades
Department, AFL-CIO
815- 16th Street, N.W. Suite 603
Washington, D.C. 20006

HOME PHONE: _____

BUSINESS PHONE: (202) 347-1461

84040493919

GC 2158

American Federation of Labor and Congress of Industrial Organizations



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

EXECUTIVE COUNCIL

LANE KIRKLAND PRESIDENT	THOMAS R. DONAHUE SECRETARY-TREASURER
John H. Lyons S. Frank Raftery Glenn E. Watts Angelo Fosco Lloyd McBride Wm. W. Winplinger Wayne E. Glenn John J. Sweeney Barbara Hutchinson Gerald W. McEntee Patrick J. Campbell	Thomas W. Gleason Murray H. Finley Sol C. Chalkin Charles H. Pillard Kenneth T. Blaylock William H. Wynn Robert F. Goss Frank Drozak Richard I. Kilroy William H. Bywater Kenneth J. Brown
	Frederick O'Neal Albert Shanker Edward T. Hanley J. C. Turner Alvin E. Heaps John DeConcini Joyce D. Miller James E. Hatfield Vincent R. Sombrotto Marvin J. Boede Owen Bieber

April 16, 1984

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

Re: FEC MUR 1657

Dear Mr. Steele:

Pursuant to 11 C.F.R. 111.23, the AFL-CIO Committee on Political Education Political Contributions Committee and I hereby designate Margaret E. McCormick as our counsel with respect to the above-referenced matter.

Ms. McCormick is authorized to receive any notifications and other communications from the Commission in connection with this matter and to act on our behalf before the Federal Election Commission.

Ms. McCormick's address is: AFL-CIO Legal Department, 815 16th Street, N.W., Washington, D.C. 20006. Her telephone numbers are: (office) 202/637-5397; (home) 301/656-9612.

Sincerely,

Thomas R. Donahue
Secretary-Treasurer

84040493920

4 APR 17 8 2: 59

REC'D
Caf 2803

84 APR 23 9:39

LAW OFFICES
SHERMAN, DUNN, COHEN, LEIFER & COUNTS, P. C.

1125 FIFTEENTH STREET, N. W.
SUITE 801
WASHINGTON, D. C. 20005

LOUIS SHERMAN (RET.)
THOMAS X. DUNN (RET.)
LAURENCE J. COHEN
ELIHU I. LEIFER
JOHN P. COUNTS
TERRY R. YELIG
RICHARD M. RESNICK
ROBERT D. KURNICK
VICTORIA L. BOR
D. WILLIAM HEINE, JR.
MARY E. VOGEL

AREA CODE 202
785-9300

MURP 1655
1657
ALL: 2
Hemougeat

April 20, 1984

*MEMBER OF CALIFORNIA BAR

Mr. Charles N. Steele, General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20465

Re: FEC MUR 1655
FEC MUR 1657

Dear Mr. Steele:

This office represents Joseph F. Maloney and the Political Education Fund of the Building and Construction Trades Department, which are respondents in the above-captioned Matters Under Review. I am writing to request an extension of time to May 11, 1984, to respond to the complaints in these cases.

Because of several prior commitments I will be unable to prepare a response before May 11. Specifically, during this period I must prepare and file a brief with the NLRB and shortly thereafter prepare and file a brief in the United States Court of Appeals for the Third Circuit. In addition, early next week I must travel out of town to attend previously scheduled depositions which cannot be postponed. Consequently, it will be impossible to prepare an adequate response before May 11.

Accordingly, I am requesting an extension of time until that date, in which to file a response in these cases.

Sincerely,

SHERMAN, DUNN, COHEN, LEIFER & COUNTS, P.C.

Robert D. Kurnick
Robert D. Kurnick

RDK:ljl

84040493921

GCC# 2157

American Federation of Labor and Congress of Industrial Organizations



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

EXECUTIVE COUNCIL

LANE KIRKLAND PRESIDENT	THOMAS R. DONAHUE SECRETARY-TREASURER
John H. Lyons S. Frank Raftery Glenn E. Watts Angelo Fosco Lloyd McBride Wm. W. Wimpelinger Wayne E. Glenn John J. Sweeney Barbara Hutchinson Gerald W. McEntee Patrick J. Campbell	Thomas W. Gleason Murray H. Finley Sol C. Chalkin Charles H. Pillard Kenneth T. Blaylock William H. Wynn Robert F. Goss Frank Drozak Richard I. Kilroy William H. Bywater Kenneth J. Brown Frederick O'Neal Albert Shanker Edward T. Hanley J. C. Turner Alvin E. Heaps John DeConcini Joyce D. Miller James E. Hatfield Vincent R. Sombrotto Marvin J. Boede Owen Bieber

April 16, 1984

*MUR 1657
Demougeat*

14 APR 17 4:25 PM

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

Re: FEC MUR 1657

Dear Mr. Steele:

The purpose of this letter is to request an extension of time from April 21, 1984 until May 11, 1984, for respondents Thomas R. Donahue and AFL-CIO Committee on Political Education Political Contributions Committee (hereinafter "respondents") to respond to the complaint in the above-referenced matter.

The reason for this request is that due to a longstanding commitment I must be out of the city on business for most of the next two weeks and will therefore be unable to do the necessary preparation to respond to the complaint in this matter and that in FEC MUR 1655, which is due on the same date, without the requested extension.

Accordingly, I respectfully request an extension of time in which to file the reply of respondents Thomas R. Donahue and AFL-CIO COPE Political Contributions Committee from April 21, 1984 until May 11, 1984.

Respectfully,

Margaret E. McCormick

Margaret E. McCormick
Counsel for Thomas R. Donahue and
AFL-CIO COPE Political Contributions
Committee

34040493922

MUR 1657



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 2, 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 the complaint of your client, James E. Antosh, which we received on March 30, 1984, against Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti, AFL-CIO COPE PCC, the Political Education Fund of the Building and Construction Trades Department and Local 1814 International Longshoremans Association AFL-CIO Political Action & Education Fund 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) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

Enclosure

84040493923

84040493924

MUR 1167 Deponent

PS Form 3811, July 1983

• 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: Michael E. Avakian
Martha M. Poindexter
Ctr. on Nat. Labor Policy
Apt. 400
1111 Port Royal Road
Springfield VA 22151

4. TYPE OF SERVICE:

<input type="checkbox"/> REGISTERED	<input type="checkbox"/> INSURED	ARTICLE NUMBER 943243
<input checked="" type="checkbox"/> CERTIFIED	<input type="checkbox"/> COO	
<input type="checkbox"/> EXPRESS MAIL		

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
4/5/84

6. ADDRESSEE'S ADDRESS (only if registered)

7. UNABLE TO DELIVER BECAUSE:

POSTMARK
only to be on reverse side

APR 11 1984

To: EMPLOYEE'S INITIALS

POSTAGE REQUIRED

4/2/84



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 5, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Joseph Randazzo, Treasurer
Local 1814 International Longshoremans
Association AFL-CIO Political Action
& Education Fund
343 Court Street
Brooklyn, New York 11231

Re: MUR 1657

Dear Mr. Randazzo:

This letter is to notify you that on March 30, 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 1657. 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.

84040493925

If you have any questions, please contact George Demougéot the staff member assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

[Handwritten Signature]
By Kenneth A. Gross
Associate General Counsel

84040493926

Enclosures

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

MAR 16 57

PS Form 3811, July 1982

● **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:** Mr. Joseph Randazzo,
Local 1814 International Longshoremen's
Assoc. AFL-CIO Political Action F
Education Fund
343 Court St
Brooklyn, N.Y. 11231

4. **TYPE OF SERVICE:**

<input type="checkbox"/> REGISTERED	<input type="checkbox"/> INSURED	ARTICLE NUMBER 943332
<input type="checkbox"/> CERTIFIED	<input type="checkbox"/> COD	
<input type="checkbox"/> EXPRESS MAIL		
(Always obtain signature of addressee or agent)		

I have received the article described above.

SIGNATURE: Addressee Authorized Agent

[Handwritten Signature]

5. **DATE OF DELIVERY** _____

POSTMARK
(Use on return only)

6. **ADDRESSEE'S ADDRESS** (only if return required)

7. **UNABLE TO DELIVER BECAUSE:**

7a. **EMPLOYEE'S INITIALS**

* GPO: 1983-378-088

Demougéot



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 5, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Joseph F. Maloney, Treasurer
Political Education Fund of the
Building and Construction
Trades Department
815 Sixteenth Street, N.W.
Suite 603
Washington, D.C. 20006-4189

Re: MUR 1657

Dear Mr. Maloney:

This letter is to notify you that on March 30, 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 1657. 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.

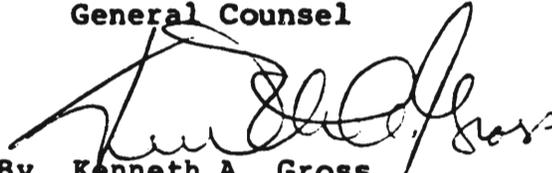
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

84040493927

If you have any questions, please contact George Demougeot the staff member assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosures

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

MUR 1257

PS Form 3811, July 1982

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

(CONSULT POSTER 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 other receipt fee.)

TOTAL \$

3. **ARTICLE ADDRESSED TO:** Mr Joseph Maloney
Political Education Fund of the
Construction Trades Department
815 16th St. N.W. Suite 603
Wash DC 20006-4189

4. **TYPE OF SERVICE:**

REGISTERED INSURED

CERTIFIED COO

EXPRESS MAIL

ARTICLE NUMBER
943331

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

Michael Maloney

5. **DATE OF DELIVERY**
4-6-84

6. **ADDRESSEE'S ADDRESS** (if not requested)

815 Wash. DC. suite 603

7. **UNABLE TO DELIVER BECAUSE:**

7a. **REASON FOR UNDELIVERABLE**

Demougeot

© GPO: 1982-379-003

84040493928



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 5, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas R. Donahue, Treasurer
American Federation of Labor-Congress
of Industrial Organizations Committee
on Political Education and Political
Contributions Committee
815 Sixteenth Street N.W.
Washington, D.C. 20006

Re: MUR 1657

Dear Mr. Donahue:

This letter is to notify you that on March 30, 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 1657. 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.

84040493929

If you have any questions, please contact George Demougout, the staff member assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

[Handwritten Signature]
By Kenneth A. Gross
Associate General Counsel

Enclosures

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

MUR 11657

PS Form 3811, July 1982

• **SHRINK:** 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: Mr. Thomas Donahue, Jr.
AFL-CIO COPE & PCC
815 16th STREET NW
Washington DC 20006

4. TYPE OF SERVICE:	ARTICLE NUMBER
<input type="checkbox"/> REGISTERED <input type="checkbox"/> INSURED	943330
<input checked="" type="checkbox"/> CERTIFIED <input type="checkbox"/> COD	
<input type="checkbox"/> EXPRESS MAIL	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

[Signature]

5. DATE OF DELIVERY

4-6-89

6. ADDRESSEE'S ADDRESS (only if requested)

815 Wash. D.C. 20006

7. UNABLE TO DELIVER BECAUSE:

EMPLOYEE'S INITIALS

[Initials]

POSTMARK
APR 9 1989

* GPO: 1982-379-503

Demougout

8404049330



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 5, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Eileen P. Deering, Treasurer
Committee to Re-elect Congressman
Leo C. Zeferetti
11 Jamaica Walk
Breezy Point, New York 11697

Re: MUR 1657

Dear Ms. Deering:

This letter is to notify you that on March 30, 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 1657. 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.

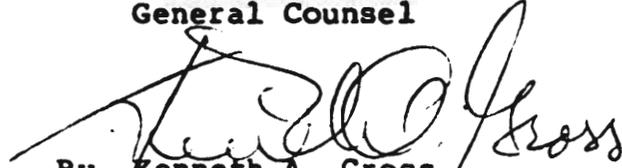
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

840404931

If you have any questions, please contact George Demougeot, the staff member assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosures

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

84040493932



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 5, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Joan DeFrance, Treasurer
Committee to Re-Elect Congressman
Leo C. Zeferetti
11 Jamaica Walk
Breezy Point, New York 11697

Re: MUR 1657

Dear Ms. DeFrance:

This letter is to notify you that on March 30, 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 1657. 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.

84040493933

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

PS Form 3811, Dec. 1989

© SENDER: Complete items 1, 2, 3, and 4. Add return 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:
 FEDERAL ELECTION COMMISSION
 WASHINGTON D.C. 20463

4. TYPE OF SERVICE: ARTICLE NUMBER
 REGISTERED INSURED 097406600
 CERTIFIED COD
 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

6. ADDRESSEE'S ADDRESS (Only if requested)

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

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 5, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Leo C. Zeferetti
11 Jamaica Walk
Breezy Point, New York 11697

Re: MUR 1657

Dear Zeferetti:

This letter is to notify you that on March 30, 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 1657. 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.

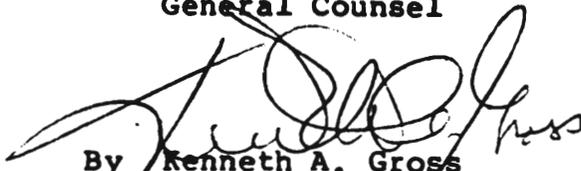
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

84040493935

If you have any questions, please contact George Demougeot, the staff member assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



By Kenneth A. Gross
Associate General Counsel

Enclosures

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

84040493936

GCC#1983

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

31 MAR 30 A 9:27

GENERAL COUNSEL

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

v.)

Complaint
MUR No. 1657

Leo C. Zeferetti; Committee to)
Re-elect Congressman Leo C.)
Zeferetti; the American)
Federation of Labor-Congress of)
Industrial Organizations)
Committee on Political Education)
and Political Contributions)
Committee and its affiliated)
separate segregated fund, the)
Political Education Fund of the)
Building and Construction Trades)
Department; Local 1814)
International Longshoremans)
Association AFL-CIO Political)
Action & Education Fund,)
and all the Committees')
treasurers,)

Respondents.)

84040493937

I. INTRODUCTION

1. Pursuant to 2 U.S.C. §437g(a)(1) James Edward Antosh brings this complaint against former candidate for federal public office, Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti, American Federation of Labor-Congress of Industrial Organizations Committee on Political Education and Political Contributions Committee ("AFL-CIO COPE-PCC") and its affiliated separate segregated fund ("SSF"), the Political Education Fund of the Building and Construction Trades Department ("P.E.F. - B.C.T.D."); Local 1814 International Longshoremans Association AFL-CIO Political Action & Education Fund ("Local 1814 IIA-AFL-CIO P.A.E.F."), 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. Leo C. Zeferetti,
636 East 38th Street
Brooklyn, New York 11203 and

84040493938

11 Jamaica Walk
Breezy Point, New York 11697.

- b. Joan De France, individually and in her capacity as treasurer of Committee to Re-elect Congressman Leo C. Zeferetti,
636 East 38th Street
Brooklyn, New York 11203.
- c. Eileen P. Deering, individually and in her capacity as treasurer of Committee to Re-elect Congressman Leo C. Zeferetti,
11 Jamaica Walk
Breezy Point, New York 11697.
- d. Committee to Re-elect Congressman Leo C. Zeferetti,
636 East 38th Street
Brooklyn, New York 11203 and
11 Jamaica Walk
Breezy Point, New York 11697.
- e. Thomas R. Donahue, individually and in his capacity as treasurer of American Federation of Labor-Congress of Industrial Organizations Committee on Political Education and Political Contributions Committee,
815 16th Street, N.W.
Washington, D. C. 20006.
- f. American Federation of Labor-Congress of Industrial Organizations Committee on Political Education and Political Contributions Committee,
815 16th Street, N.W.
Washington, D. C. 20006.
- g. Joseph F. Maloney, individually and in his capacity as treasurer of the Political Education Fund of the Building and Construction Trades Department,
815 16th Street, N.W. - Suite 603
Washington, D. C. 20006-4189.

- h. Political Education Fund of the Building and Construction Trades Department,
815 16th Street, N.W. - Suite 603
Washington, D. C. 20006-4189.
- i. Joseph Randazzo, individually and in his capacity as treasurer of Local 1814 International Longshoremans Association AFL-CIO Political Action & Education Fund,
343 Court Street
Brooklyn, New York 11231.
- j. Local 1814 International Longshoremans Association AFL-CIO Political Action & Education Fund,
343 Court Street
Brooklyn, New York 11231.

III. LIABILITY

3. Liability may be imposed upon the candidate, Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti, AFL-CIO COPE-PCC and its affiliated SSF, P.E.F. - B.C.T.D.; and Local 1814 ILA AFL-CIO P.A.E.F. 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 AFL-CIO COPE-PCC and its affiliated SSF, P.E.F. - B.C.T.D., 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)(i)(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 general election in which Leo C. Zeferetti 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 Leo C. Zeferetti; Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer; AFL-CIO COPE-PCC and its treasurer; P.E.F. - B.C.T.D. and its treasurer; and Local 1814 IIA AFL-CIO P.A.E.F. and its treasurer filed for the 1982 federal general election.

7. For the 1982 federal general election, excessive funds were contributed to Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer by AFL-CIO COPE-PCC and its treasurer; P.E.F. - B.C.T.D. and its treasurer; and Local 1814 IIA AFL-CIO P.A.E.F. and its treasurer.

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 LEO C. ZEFERETTI
IN THE
1982 FEDERAL GENERAL 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, Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal general election from AFL-CIO COPE-PCC and its affiliated SSF, P.E.F. - B.C.T.D., in the amount of \$6,000.00 (SIX THOUSAND DOLLARS).

10. Candidate Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer, for the 1982 federal general election, accepted contributions from AFL-CIO COPE-PCC and its

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affiliated SSF, P.E.F. - B.C.T.D., in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>Contributor</u>	<u>F.E.C. Microfilm Location</u>
10/17/82	\$2,500.00	AFL-CIO COPE-PCC	#83012442780
10/27/82	\$1,000.00	AFL-CIO COPE-PCC	#83012442780
3/31/82	<u>\$2,500.00</u>	P.E.F. - B.C.T.D.	#82012141176
Total = \$6,000.00			

11. A running total of contributions from AFL-CIO COPE-PCC and its affiliated SSF, P.E.F. - B.C.T.D., would have put on notice Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer that they had received \$5,000.00 (FIVE THOUSAND DOLLARS) by October 17, 1982. On that date, Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer could no longer lawfully accept any contributions from AFL-CIO COPE-PCC and its affiliated SSF, P.E.F. - B.C.T.D.. In violation of 2 U.S.C. §441(f), Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer accepted a contribution from these contributors in the amount of \$1,000.00 (ONE THOUSAND DOLLARS). This amount exceeded the statutory monetary ceiling by \$1,000.00 (ONE THOUSAND DOLLARS).

12. Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer failed to accurately report the \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS) contribution of March 23, 1982 which was designated by P.E.F.-B.C.T.D. as a

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contribution for the general election. (See F.E.C. Microfilm #82032292914.) In violation of 11 C.F.R. §104.14(d), Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer reported it as a contribution for the primary election. (See F.E.C. Microfilm #82012141176.) F.E.C. regulation, 11 C.F.R. §104.14(d), provides that a treasurer "shall be personally responsible for the timely and complete filing of the report or statement and for the accuracy of any information contained therein."

13. 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, Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal general election from Local 1814 IIA AFL-CIO P.A.E.F. in the amount of \$8,500.00 (EIGHT THOUSAND FIVE HUNDRED DOLLARS).

14. Candidate Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer, for the 1982 federal general election, accepted contributions from Local 1814 IIA AFL-CIO

P.A.E.F. in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>F.E.C. Microfilm Location</u>
3/25/82	\$3,500.00	#82012141175
10/14/82	<u>\$5,000.00</u>	#83012442780
Total = \$8,500.00		

15. A running total of the amount of contributions received from Local 1814 IIA AFL-CIO P.A.E.F. would have put on notice Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer that they had received \$3,500.00 (THREE THOUSAND FIVE HUNDRED DOLLARS) on March 25, 1982. On that date, Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer were only permitted to accept an additional contribution of \$1,500.00 (ONE THOUSAND FIVE HUNDRED 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.

16. Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti, and its treasurer failed to accurately report the \$3,500.00 (THREE THOUSAND FIVE HUNDRED DOLLARS) contribution of March 17, 1982 which was designated by Local 1814 IIA AFL-CIO P.A.E.F. as a contribution for the general election. (See F.E.C. Microfilm #82032294105.) In violation of 11 C.F.R. §104.14(d), Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer reported it as a contribution for the primary

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election. (See F.E.C. Microfilm #82012141175.) F.E.C. regulation, 11 C.F.R. §104.14(d), provides that a treasurer "shall be personally responsible for the timely and complete filing of the report or statement and for the accuracy of any information contained therein."

**VI. VIOLATIONS OF THE F.E.C.A.
BY
AFL-CIO COPE-PCC AND
P.E.F. - B.C.T.D.
IN THE
1982 FEDERAL GENERAL ELECTION**

17. 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 AFL-CIO COPE-PCC and its affiliated SSF, P.E.F. - B.C.T.D., for the 1982 federal general election contributed to candidate Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer a total of \$6,000.00 (SIX THOUSAND DOLLARS).

18. AFL-CIO COPE-PCC and P.E.F. - B.C.T.D. contributed the following amounts:

- a. On September 21, 1982, AFL-CIO COPE-PCC contributed \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS). (See F.E.C. Microfilm #82032495333.)

b. On October 27, 1982, AFL-CIO COPE-PCC contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm #82032553035.)

c. On March 23, 1982, P.E.F. - B.C.T.D. contributed \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS). (See F.E.C. Microfilm #82032292914.)

19. A running total of the amount contributed to Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer by AFL-CIO COPE-PCC and its affiliated SSF, P.E.F. - B.C.T.D., would have put them on notice that as of September 21, 1982, they had contributed \$5,000.00 (FIVE THOUSAND DOLLARS). In violation of 2 U.S.C. §441a(a)(2)(A), AFL-CIO COPE-PCC made a \$1,000.00 (ONE THOUSAND DOLLARS) contribution on October 27, 1982 which exceeded the \$5,000.00 (FIVE THOUSAND DOLLARS) ceiling by \$1,000.00 (ONE THOUSAND DOLLARS).

**VII. VIOLATIONS OF THE F.E.C.A.
BY
Local 1814 IIA AFL-CIO P.A.E.F.
IN THE
1982 FEDERAL GENERAL ELECTION**

20. 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 Local 1814 IIA AFL-CIO P.A.E.F., for the 1982 federal general election contributed

to candidate Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer a total of \$8,500.00 (EIGHT THOUSAND FIVE HUNDRED DOLLARS).

21. Local 1814 IIA AFL-CIO P.A.E.F. contributed the following amounts:

- a. On March 17, 1982, Local 1814 IIA AFL-CIO P.A.E.F. contributed \$3,500.00 (THREE THOUSAND FIVE HUNDRED DOLLARS). (See F.E.C. Microfilm #82032294105.)
- b. On October 13, 1982, Local 1814 IIA AFL-CIO P.A.E.F. contributed \$5,000.00 (FIVE THOUSAND DOLLARS). (See F.E.C. Microfilm #82032521460.)

22. A running total of the amount contributed to Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer would have put on notice Local 1814 IIA AFL-CIO P.A.E.F. that as of March 17, 1982, it had contributed \$3,500.00 (THREE THOUSAND FIVE HUNDRED DOLLARS) and that it could only contribute an additional \$1,500.00 (ONE THOUSAND FIVE HUNDRED DOLLARS) if it wished to meet the mandates of the law. In violation of 2 U.S.C. §441a(a)-(2)(A), a \$5,000.00 (FIVE THOUSAND DOLLARS) contribution was made to Leo C. Zeferetti, Committee to Re-elect Congressman Leo C. Zeferetti and its treasurer. This amount exceeded the statutory monetary ceiling by \$3,500.00 (THREE THOUSAND FIVE HUNDRED DOLLARS).

VIII. CONCLUSION

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

24. 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
Center on National Labor Policy
5211 Port Royal Road, Suite 400
North Springfield, VA 22151
(703) 321-9180

Attorneys for Complainant

March 30, 1984

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 7th day of March 1984.

Denise K. Almon
Notary Public

My Commission expires:

Sept. 17, 1986

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EAGLE
Troy, Ohio

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.

March 7, 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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