



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20543

THIS IS THE END OF MUR # 1716

Date Filmed 5/26/86 Camera No. --- 2

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Routing cards & slips; references to R Index in 1st QC Report;

Conciliation correspondence & reports; 12 Day Pre-Brief &

Comments; References to conciliation discussions in General.

Council's Brief

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 checked="" type="checkbox"/> | (3) Exempted by other statute | <input type="checkbox"/> | (8) Banking information |
| <input type="checkbox"/> | (4) Trade secrets and commercial or financial information | <input type="checkbox"/> | (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> | (5) Internal Documents | | |

Signed

George Deming

date

5-7-86

FEC 5-21-77

86040583349



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1986

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

RE: MUR 1716
Brown for U.S. Senate
Committee
American Federation of
Teachers Committee on
Political Education
Political Action Council
of Educators
Amalgamated Clothing and
Textile Workers Union PAC
International Ladies'
Garment Workers' Union
Campaign Committee

Dear Mr. Avakian and Ms. Poindexter:

This is in reference to the complaint you filed with the Commission on May 31, 1984, concerning the above caption organizations. The Commission determined there was reason to believe that the American Federation of Teachers Committee on Political Education ("AFT-COPE"), Political Action Council of Educators ("PACE"), and International Ladies' Garment Workers' Union Campaign Committee ("ILGWUCC") violated 2 U.S.C. § 441a(a)(2)(A). In addition, the Commission determined there was reason to believe that Brown for U.S. Senate violated 2 U.S.C. § 441a(f). Further, the Commission determined there was no reason to believe that Amalgamated Clothing and Textile Workers Union PAC ("ACTWU-PAC") violated 2 U.S.C. § 441a(a)(2)(A). Finally, the Commission determined there was reason to believe that AFT-COPE and ACTWU-PAC violated 11 C.F.R. § 104.14(d).

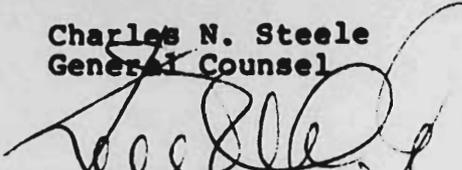
On March 24, 1986, a conciliation agreement signed by the last respondent was accepted by the Commission, thereby closing the file in this matter. Copies of all the agreements are enclosed for your information.

8604076350

The file number in this matter is MUR 1716. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross *KAG*
Associate General Counsel

Enclosure
Conciliation Agreements

86040563351



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1986

Max Zimny, Esquire
General Counsel
International Ladies' Garment Workers' Union
1710 Broadway
New York, New York 10019

RE: MUR 1716
International Ladies' Garment
Workers' Union Campaign
Committee and Lawrence
Dock, treasurer

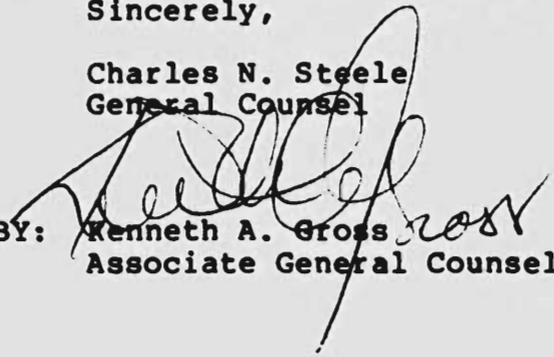
Dear Mr. Zimny:

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

Should you have any questions, contact George Demougeot, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

86040563352



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1986

The Honorable Edmund G. Brown, Jr.
Reavis & McGrath
Sixth Floor - Broadway Plaza
700 South Flower Street
Los Angeles, CA 90017

RE: MUR 1716
Brown for U.S. Senate
Committee and Julius Glazer,
as treasurer

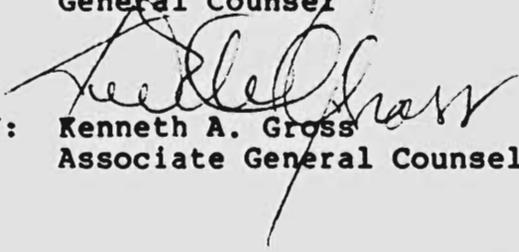
Dear Governor Brown:

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

Should you have any questions, contact George Demougeot, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

8604053354



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1986

Joan Ruby, Esquire
Assistant General Counsel
Amalgamated Clothing and Textile Workers Union
15 Union Square
New York, New York 10003

RE: MUR 1716
Amalgamated Clothing and
Textile Workers Union
Political Action
Committee and George
Solomons, Treasurer

Dear Ms. Ruby:

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

Should you have any questions, contact George Demougeot, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

86040563355



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1986

William C. Oldaker, Esquire
Epstein, Becker, Borsody & Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 20036

RE: MUR 1716
American Federation of
Teachers Committee on
Political Education and
Robert G. Potter, as
treasurer

Dear Mr. Oldaker:

On March 24, 1986, the Commission accepted the conciliation agreement signed by you, and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure

850405633556

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1716
American Federation of)
Teachers Committee on)
Political Education)

Robert G. Porter, Treasurer

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by James E. Antosh. The Commission found reason to believe that the American Federation of Teachers Committee on Political Education ("AFT-COPE") and Robert G. Porter as treasurer of AFT-COPE (the "Respondents") violated 2 U.S.C. § 441a(a)(2)(A) by making contributions to the Brown for United States Senate Committee which, when aggregated with contributions to the Brown Committee by the Political Action Committee of Educators ("PACE") exceeded \$5,000 for a single election.

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

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

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

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

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

1. Respondent AFT-COPE is the separate segregated fund of the American Federation of Teachers.

2. Robert G. Porter is the treasurer of AFT-COPE.

3. AFT-COPE is affiliated with PACE which is the separate segregated fund of United Teachers-Los Angeles.

4. In 1982 AFT-COPE made contributions of \$4,425 to the Brown for United States Senate Committee for use in the primary election.

5. In 1982 PACE made contributions of \$2,000 to the Brown for United States Senate Committee for use in the primary election.

6. The aggregated contributions made in 1982 by AFT-COPE and PACE to the Brown for United States Senate Committee for use in the 1982 primary election totalled \$6,425.

7. 2 U.S.C. § 441a(a)(2)(A) limits to \$5,000 the contributions which a multicandidate committee may make to a candidate for federal office with respect to any election.

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8. 2 U.S.C. § 441a(a)(5) provides that all contributions made by political committees established or financed or maintained or controlled by a labor organization, including any parent, subsidiary, branch, division, department, or local unit of such labor organization, are to be considered to have been made by a single committee.

9. As affiliated multicandidate committees, AFT-COPE and PACE shared a \$5,000 contribution limitation.

V. By making contributions in 1982 to the Brown for United States Senate Committee for the primary election which, when aggregated with contributions to the same committee by PACE totalled \$6,425, AFT-COPE and Robert G. Porter, as treasurer of AFT-COPE, violated 2 U.S.C. § 441a(a)(2)(A).

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Three Hundred Dollars (\$300), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

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

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

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

FOR THE COMMISSION:
General Counsel

BY: *Kenneth A. Gross* *March 26, 1936*
Kenneth A. Gross, Esq. Date
Associate General Counsel

FOR THE RESPONDENT:

BY: *William C. Oldaker* *2/6/36*
William C. Oldaker, Esq. Date
Counsel for Respondents

86040563360



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

William C. Oldaker, Esquire
Epstein, Becker, Borsody & Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 20036

RE: MUR 1716
American Federation of
Teachers Committee on
Political Education and
Robert G. Potter, as
treasurer

Dear Mr. Oldaker:

On March 24, 1986, the Commission accepted the conciliation agreement signed by you, and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure

RUC7
3/26/86

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Joan Ruby, Esquire
Assistant General Counsel
Amalgamated Clothing and Textile Workers Union
15 Union Square
New York, New York 10003

RE: MUR 1716
Amalgamated Clothing and
Textile Workers Union
Political Action
Committee and George
Solomons, Treasurer

Dear Ms. Ruby:

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

Should you have any questions, contact George Demougeot, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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Handwritten signature and date:
RM
3/29/86



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

The Honorable Edmund G. Brown, Jr.
Reavis & McGrath
Sixth Floor - Broadway Plaza
700 South Flower Street
Los Angeles, CA 90017

RE: MUR 1716
Brown for U.S. Senate
Committee and Julius Glazer,
as treasurer

Dear Governor Brown:

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

Should you have any questions, contact George Demougeot, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

RVT
3/26/86

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Leo Geffner, Esquire
Geffner & Satzman
3055 Wilshire Boulevard
Suite 900
Los Angeles, California 90010

RE: MUR 1716
Political Action Council
of Educators (United
Teachers - Los Angeles)
and William Zimmerman,
treasurer

Dear Mr. Geffner:

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

Should you have any questions, contact George Demougeot, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Rvtz
3/26/86

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Max Zimny, Esquire
General Counsel
International Ladies' Garment Workers' Union
1710 Broadway
New York, New York 10019

RE: MUR 1716
International Ladies' Garment
Workers' Union Campaign
Committee and Lawrence
Dock, treasurer

Dear Mr. Zimny:

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

Should you have any questions, contact George Demougeot, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

RW
3/26/86

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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

RE: MUR 1716
Brown for U.S. Senate
Committee
American Federation of
Teachers Committee on
Political Education
Political Action Council
of Educators
Amalgamated Clothing and
Textile Workers Union PAC
International Ladies'
Garment Workers' Union
Campaign Committee

Dear Mr. Avakian and Ms. Poindexter:

This is in reference to the complaint you filed with the Commission on May 31, 1984, concerning the above caption organizations. The Commission determined there was reason to believe that the American Federation of Teachers Committee on Political Education ("AFT-COPE"), Political Action Council of Educators ("PACE"), and International Ladies' Garment Workers' Union Campaign Committee ("ILGWUCC") violated 2 U.S.C. § 441a(a)(2)(A). In addition, the Commission determined there was reason to believe that Brown for U.S. Senate violated 2 U.S.C. § 441a(f). Further, the Commission determined there was no reason to believe that Amalgamated Clothing and Textile Workers Union PAC ("ACTWU-PAC") violated 2 U.S.C. § 441a(a)(2)(A). Finally, the Commission determined there was reason to believe that AFT-COPE and ACTWU-PAC violated 11 C.F.R. § 104.14(d).

On _____, 1986, a conciliation agreement signed by the last respondent was accepted by the Commission, thereby closing the file in this matter. Copies of all the agreements are enclosed for your information.

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PH
GA
3/26/86

The file number in this matter is MUR 1716. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreements

85040183367

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
American Federation of)	MUR 1716
Teachers Committee on)	
Political Education)	
Robert G. Potter, treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 24, 1986, the Commission decided by a vote of 6-0 to take the following actions in MUR 1716:

1. Accept the conciliation agreement offered by the American Federation of Teachers Committee on Political Education and Robert G. Potter, as treasurer, as recommended in the General Counsel's Report signed March 19, 1986.
2. Approve the proposed letters, as recommended in the General Counsel's Report signed March 19, 1986.
3. Close the file.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald and McGarry voted affirmatively for this decision.

Attest:

3-24-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Thurs.,	3-20-86,	8:58
Circulated on 48 hour tally basis:	Thurs.,	3-20-86,	4:00
Deadline for vote:	Mon.,	3-24-86,	4:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 12, 1986

The Honorable Edmund G. Brown, Jr.
Reavis & McGrath
Sixth Floor - Broadway Plaza
700 South Flower Street
Los Angeles, CA 90017

RE: MUR 1716
Brown for U.S. Senate
Committee and Julius Glazer,
as treasurer

Dear Governor Brown:

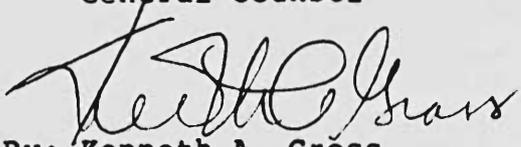
On February 10, 1986, the Commission accepted the conciliation agreement signed by your committee, and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your committee and it will become a part of the public record within thirty days after this matter has been closed with respect to all other respondents involved. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing within 10 days.

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

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

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

8604033369

RECEIVED AT THE FEC
ECC#9570
86 JAN 27 AIO: 24

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Brown for U.S. Senate) MUR 1716
Committee)
Julius Glazer, Treasurer)

36 JAN 27 P 5: 32

GENERAL INVEST

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by James E. Antosh. The Commission found reason to believe that the Brown for U.S. Senate Committee and Julius Glazer, as treasurer, ("Respondents") violated 2 U.S.C. § 441a(f) in 1982 by accepting contributions which exceeded \$5,000 for a single election.

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

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C.

§ 437g(a)(4)(A)(i).

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

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

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

1. Respondent Brown for U.S. Senate Committee was the principal campaign committee of Edmund G. Brown in 1981-1982.

2. Respondent Julius Glazer is the treasurer of the Brown for U.S. Senate Committee.

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3. International Ladies' Garment Workers' Union Campaign Committee ("ILGWUCC") is a separate segregated fund of a labor organization, International Ladies' Garment Workers' Union.

4. In 1982 the ILGWUCC made contributions totalling \$6,000 to the Brown for U.S. Senate Committee for use in the general election.

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

6. 2 U.S.C. § 441a(f) prohibits knowing acceptance by a political committee or an officer of a political committee of contributions which exceed the limitations established by 2 U.S.C. § 441a(2)(A).

V. By accepting contributions in 1982 for the general election campaign in excess of the \$5,000 limitation established by 2 U.S.C. § 441a(a)(2)(A), the Brown for U.S. Senate Committee and Julius Glazer as treasurer of the Brown for U.S. Senate Committee violated 2 U.S.C. § 441a(f).

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Three Hundred Dollars (\$300), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

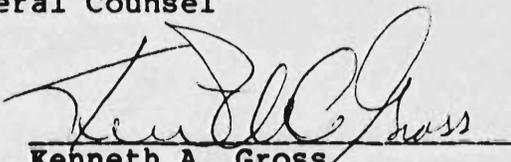
IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

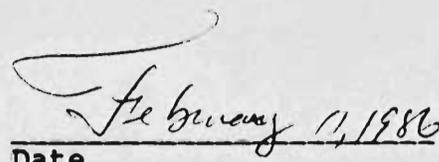
X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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

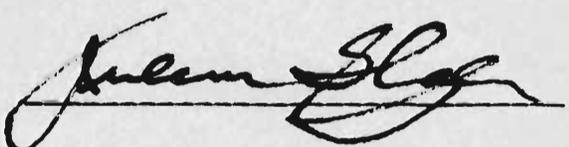
FOR THE COMMISSION:

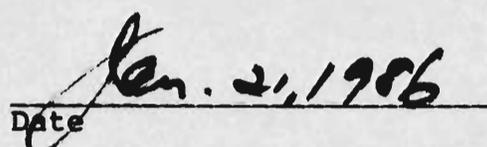
Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel


Date February 11, 1986

FOR THE RESPONDENT:




Date Jan. 21, 1986

86040563372



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 12, 1986

The Honorable Edmund G. Brown, Jr.
Reavis & McGrath
Sixth Floor - Broadway Plaza
700 South Flower Street
Los Angeles, CA 90017

RE: MUR 1716
Brown for U.S. Senate
Committee and Julius Glazer,
as treasurer

Dear Governor Brown:

On February 10, 1986, the Commission accepted the conciliation agreement signed by your committee, and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your committee and it will become a part of the public record within thirty days after this matter has been closed with respect to all other respondents involved. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing within 10 days.

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

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

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

86040563373



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

The Honorable Edmund G. Brown, Jr.
Reavis & McGrath
Sixth Floor - Broadway Plaza
700 South Flower Street
Los Angeles, CA 90017

RE: MUR 1716
Brown for U.S. Senate
Committee and Julius Glazer,
as treasurer

Dear Governor Brown:

On _____, 1986, the Commission accepted the conciliation agreement signed by your committee, and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your committee and it will become a part of the public record within thirty days after this matter has been closed with respect to all other respondents involved. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing within 10 days.

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

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

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

AD
2/11/86
RVT
2/11/86

85040563374

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1716
Brown for U.S. Senate Committee)
and Julius Glazer, as)
treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 10, 1986, the Commission decided by a vote of 5-0 to take the following actions in MUR 1716:

1. Accept the conciliation agreement offered by Brown for U.S. Senate Committee and Julius Glazer, as treasurer, attached to the General Counsel's Report signed January 31, 1986, and close the file as it pertains to them.
2. Approve the proposed letter attached to the General Counsel's Report signed January 31, 1986.

Commissioners Aikens, Elliott, Josefiak, McDonald and McGarry voted affirmatively for this decision; Commissioner Harris did not cast a vote.

Attest:

2/10/86
Date

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

Received in Office of Commission Secretary: Mon., 2-3-86, 10:13
Circulated on 48 hour tally basis: Mon., 2-3-86, 11:00
Deadline for vote: Wed., 2-5-86, 11:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 3, 1985

Leo Geffner, Esquire
Geffner & Satzman
3055 Wilshire Boulevard
Suite 900
Los Angeles, California 90010

RE: MUR 1716
Political Action Council of
Educators (United Teachers -
Los Angeles) and
William Zimmerman, treasurer

Dear Mr. Geffner:

On November 25, 1985, the Commission accepted the conciliation agreement signed by your clients, and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your clients, and it will become a part of the public record within thirty days after this matter has been closed with respect to all other respondents involved. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing within 10 days.

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

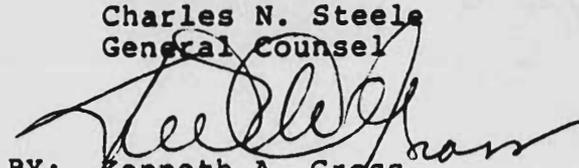
8504056376

Letter to Leo Geffner, Esquire
Page 2

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

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

86040563377

BEFORE THE FEDERAL ELECTION COMMISSION

85 JAN 17 All: 24

In the Matter of)
)
 Political Action Council of) MUR 1716
 Educators (United Teachers -)
 Los Angeles)
 William Zimmerman, Treasurer)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by James E. Antosh. The Commission found reason to believe that the Political Action Council of Educators (United Teachers - Los Angeles) ("PACE") and William Zimmerman, as treasurer, of PACE ("Respondent") violated 2 U.S.C.

§ 441a(a)(2)(A) by making contributions to the Brown for United States Senate Committee which, when aggregated with contributions to the Brown Committee by the American Federation of Teachers Committee on Political Education ("AFT-COPE"), exceeded \$5,000 for a single election.

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

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C.

§ 437g(a)(4)(A)(i).

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

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

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

1. Respondent PACE is the separate segregated fund of United Teachers - Los Angeles.

2. William Zimmerman is the treasurer of PACE.

3. PACE is affiliated with AFT-COPE which is a separate segregated fund of the American Federation of Teachers.

4. In 1982 PACE made contributions of \$2,000 to the Brown for United States Senate Committee for use in the primary election.

5. In 1982 AFT-COPE made contributions of \$4,425 to the Brown for United States Senate Committee for use in the primary election.

6. The aggregated contributions made in 1982 by PACE and AFT-COPE to the Brown for United States Senate Committee for use in the 1982 primary election totalled \$6,425.

7. 2 U.S.C. § 441a(a)(2)(A) limits to \$5,000 the contributions which a multicandidate committee may make to a candidate for federal office with respect to any election.

8. 2 U.S.C. § 441a(a)(5) provides that all contributions made by political committees established or financed or maintained or controlled by a labor

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

9. As affiliated multicandidate committees, PACE and AFT-COPE shared a \$5,000 contribution limitation.

V. By accepting contributions in 1982 to the Brown for United States Senate Committee for the primary election which, when aggregated with contributions to the same committee by AFT-COPE totalled \$6,425 PACE and William Zimmerman as treasurer of PACE violated 2 U.S.C. § 441a(a)(2)(A).

VI. Respondent PACE will pay a civil penalty to the Treasurer of the United States in the amount of Two Hundred Twenty-Three Dollars (\$223.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

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

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

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

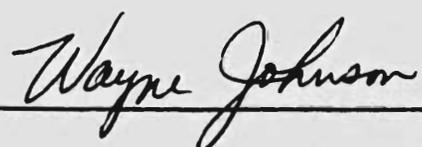
FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

11/27/85
Date

FOR THE RESPONDENT:



1/11/85
Date

86040565381

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Political Action Council of)	MUR 1716
Educators (United Teachers-)	
Los Angeles) and)	
William Zimmerman, as treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 25, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 1716:

1. Accept the conciliation agreement offered by the Political Action Council of Educators (United Teachers-Los Angeles) and William Zimmerman, as treasurer, and close the file as it pertains to them.
2. Approve the proposed letter attached to the General Counsel's Report signed November 19, 1985.

Commissioners Aikens, Elliott, Harris, Josefiak and McGarry voted affirmatively for this decision; Commissioner McDonald did not cast a vote.

Attest:

11-25-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

86040563382

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Political Action Council of)	MUR 1716
Educators (United Teachers-)	
Los Angeles) and)	
William Zimmerman, as treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 25, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 1716:

1. Accept the conciliation agreement offered by the Political Action Council of Educators (United Teachers-Los Angeles) and William Zimmerman, as treasurer, and close the file as it pertains to them.
2. Approve the proposed letter attached to the General Counsel's Report signed November 19, 1985.

Commissioners Aikens, Elliott, Harris, Josefiak and McGarry voted affirmatively for this decision; Commissioner McDonald did not cast a vote.

Attest:

11-25-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

86040763383



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1985

Max Zimny, Esquire
General Counsel
International Ladies' Garment
Workers' Union
1710 Broadway
New York, New York 10019

Re: MUR 1716
International Ladies' Garment
Workers' Union Campaign Committee
and Jay Mazur, as treasurer

Dear Mr. Zimny:

On May 15, 1985, the Commission accepted the conciliation agreement signed by your clients, and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your clients, and it will become a part of the public record within thirty days after this matter has been closed with respect to all other respondents involved. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing within 10 days.

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

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

Sincerely,

Charles N. Steele
General Counsel

[Handwritten Signature]
BY: Kenneth H. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

86040583384

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
International Ladies' Garment) MUR 1716
Workers' Union Campaign)
Committee and)
Lawrence Dock, Treasurer)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by James E. Antosh. The Commission found reason to believe that the International Ladies' Garment Workers' Union Campaign Committee ("ILGWUCC") and Lawrence Dock, as treasurer of the ILGWUCC ("Respondents") violated 2 U.S.C. § 441a(a)(2)(A) by making contributions to the Brown for U.S. Senate Committee which exceeded \$5,000 for a single election.

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

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

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

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

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

1. Respondent ILGWUCC is a separate segregated fund of a labor organization, the International Ladies' Garment Workers'

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Union.

2. Respondent Lawrence Dock was the treasurer of the ILGWUCC in 1982.

3. Brown for U.S. Senate Committee was the principal campaign committee of Edmund G. Brown in 1981-1982.

4. In 1982 Respondent ILGWUCC made contributions of \$6,000 to the Brown for U.S. Senate Committee for use in the general election. ILGWUCC alleges that the last \$1,000 contribution for the general election was due to an inadvertent error and was returned to ILGWUCC in 1984 by the Brown for U.S. Senate Committee.

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

V. By making contributions in 1982 to the Brown for U.S. Senate Committee for the general election which totalled \$6,000, the ILGWUCC and Lawrence Dock, as treasurer of the ILGWUCC, violated 2 U.S.C. §441a(a)(2)(A).

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Five Hundred Dollars (\$500), pursuant to 2 U.S.C. §437g(a)(5)(A).

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

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement

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or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

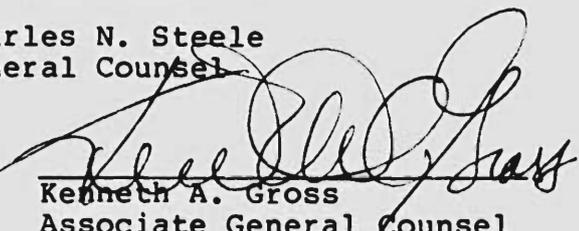
X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

Charles N. Steele
General Counsel

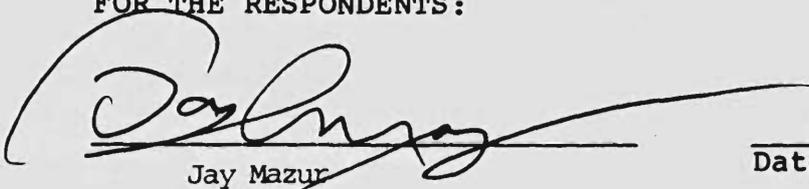
BY:


Kenneth A. Gross
Associate General Counsel

Date

May 20, 1985

FOR THE RESPONDENTS:


Jay Mazur
Treasurer

Date

4/1/85

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1716
Brown for U.S. Senate Committee)
and Burt Pines, as treasurer,)
et. al.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 15, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1716:

1. Accept the conciliation agreement offered by the International Ladies' Garment Workers' Union Campaign Committee and Jay Mazur, as treasurer, and close the file as it pertains to them.
2. Approve the letter attached to the General Counsel's Report signed May 10, 1985.

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

Attest:

5-17-85
Date

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

Received in Office of Commission Secretary: 5-13-85, 9:09
Circulated on 48 hour tally basis: 5-13-85, 4:00

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GCL#6115

EPSTEIN BECKER BORSODY & GREEN, P.C.

ATTORNEYS AT LAW

1140 19TH STREET, N.W.

WASHINGTON, D.C. 20036

(202) 861-0900

280 PARK AVENUE
NEW YORK, NEW YORK 10177
(212) 370-9800

MALICK TOWER
ONE SUMMIT AVENUE
FORT WORTH, TEXAS 76102
(817) 334-0701

1875 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067
(213) 556-8861

FOUR EMBARCADERO
SAN FRANCISCO, CALIFORNIA 94111
(415) 398-8868

P.C. IN NEW YORK AND
WASHINGTON, D.C. ONLY

December 27, 1984

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

Re: MUR 1716--Respondents, Brown for U.S. Senate
Committee and Burt Pines, Treasurer

Dear Mr. Steele:

The Brown for U.S. Senate Committee and Burt Pines,
Treasurer of the Brown for U.S. Senate Committee (the "Respon-
dents"), hereby request that this complaint, MUR 1716, be
handled through conciliation pursuant to 2 U.S.C.
§437g(a)(4)(A)(i).

This request is in response to Commission's deter-
mination of December 11, 1984 that there is reason to believe
that Respondents violated 2 U.S.C. §441a(f) by accepting ex-
cessive contributions from the International Ladies' Garment
Workers' Union Campaign Committee.

Sincerely,

William C. Oldaker
William C. Oldaker *WCO*

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COMMUNICATIONS SECTION

GCC # 6115

EPSTEIN BECKER BORSODY & GREEN, P.C.

ATTORNEYS AT LAW
1140 19TH STREET, N.W.

WASHINGTON, D.C. 20036
(202) 861-0900

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1875 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067
(213) 556-8861

FOUR EMBARCADERO
SAN FRANCISCO, CALIFORNIA 94111
(415) 398-5565

250 PARK AVENUE
NEW YORK, NEW YORK 10177
(212) 370-9800

MALICK TOWER
ONE SUMMIT AVENUE
FORT WORTH, TEXAS 76102
(817) 334-0701

P.C. IN NEW YORK AND
WASHINGTON, D.C. ONLY

December 27, 1984

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DEC 27 1984
FIC: 20

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

Re: MUR 1716--Respondents, Brown for U.S. Senate
Committee and Burt Pines, Treasurer

Dear Mr. Steele:

The Brown for U.S. Senate Committee and Burt Pines,
Treasurer of the Brown for U.S. Senate Committee (the "Respon-
dents"), hereby request that this complaint, MUR 1716, be
handled through conciliation pursuant to 2 U.S.C.
§437g(a)(4)(A)(i).

This request is in response to Commission's deter-
mination of December 11, 1984 that there is reason to believe
that Respondents violated 2 U.S.C. §441a(f) by accepting ex-
cessive contributions from the International Ladies' Garment
Workers' Union Campaign Committee.

Sincerely,

William C. Oldaker
William C. Oldaker *WJO*

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6CC # 6180

INTERNATIONAL LADIES' GARMENT WORKERS' UNION: 10

AFL-CIO

1710 BROADWAY • NEW YORK, N.Y. 10019

CABLE ADDRESS: ILGWU—NEW YORK • PHONE: 212-265-7000

LEGAL DEPARTMENT

MAX ZIMNY
General Counsel

CERTIFIED MAIL, RRR

December 26, 1984

Mr. George Demougeot
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1716
International Ladies' Garment
Workers' Union Campaign
Committee and Lawrence Dock,
Treasurer

Dear Mr. Demougeot:

This will confirm my phone conversation with you today in which I indicated that my clients, International Ladies' Garment Workers' Union Campaign Committee and Lawrence Dock, as Treasurer, are interested in pre-probable cause conciliation of this matter.

I await further word from the Office of General Counsel.

Sincerely yours,

Max Zimny
Max Zimny
General Counsel

MZ:cs

c: Lee Ann Elliott,
Chairman, FEC

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MZ Legal Dept.

From

ILGWU

INTERNATIONAL LADIES GARMENT WORKERS
UNION 1710 BROADWAY NEW YORK N.Y. 10019

84 DEC 31

PI. 10

To

Mr. George Demougeot
Federal Election Commission
Washington, D.C. 20463

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CERTIFIED MAIL
DEC 29 1984

CERTIFIED MAIL

CERTIFIED-RRR

INTERNATIONAL LADIES' GARMENT WORKERS' UNION

AFL-CIO

1710 BROADWAY • NEW YORK, N.Y. 10019

CABLE ADDRESS: ILGWU-NEW YORK • PHONE: 212-265-7000

COMMITTEE SECRETARY

GCC #6113
84 DEC 28 AM: 46

LEGAL DEPARTMENT

MAX ZIMNY
General Counsel

Demougeot

CERTIFIED MAIL, RRR

December 26, 1984

Mr. George Demougeot
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1716
International Ladies' Garment
Workers' Union Campaign
Committee and Lawrence Dock,
Treasurer

Dear Mr. Demougeot:

This will confirm my phone conversation with you today in which I indicated that my clients, International Ladies' Garment Workers' Union Campaign Committee and Lawrence Dock, as Treasurer, are interested in pre-probable cause conciliation of this matter.

I await further word from the Office of General Counsel.

Sincerely yours,

Max Zimny
Max Zimny
General Counsel

MZ:cs

c: Lee Ann Elliott,
Chairman, FEC

85040583394



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 14, 1984

Joan Ruby, Esquire
Assistant General Counsel
Amalgamated Clothing and Textile Workers Union
15 Union Square
New York, New York 10003

RE: MUR 1716
Amalgamated Clothing and
Textile Workers Union
Political Action Committee and
George Solomons, Treasurer

Dear Ms. Ruby:

The Federal Election Commission notified your client on June 6, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your client at that time. We acknowledge receipt of your client's explanation of this matter which was dated July 9, 1984.

Upon review of the allegations contained in the complaint and information supplied by your client, the Commission, on December 11, 1984, determined that there is no reason to believe that the Amalgamated Clothing and Textile Workers Union Political Action Committee and George Solomons, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act.

Also, the Commission, on December 11, 1984, determined that the Amalgamated Clothing and Textile Workers Union Political Action Committee and George Solomons, as treasurer, violated 11 C.F.R. § 104.14(d) for improper reporting of contributions. However, after considering the circumstances in this matter, the Commission has determined to take no further action and close its file. Accordingly, the Commission closed its file in this matter as it pertains to your client. This matter will become a part of

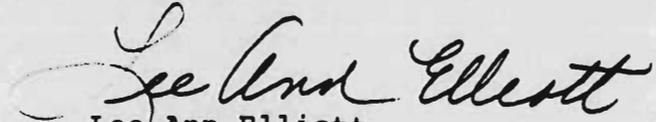
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Joan Ruby, Esquire
Page 2

the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

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

Sincerely,



Lee Ann Elliott
Chairman

86040783397



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 14, 1984

Roger D. Loomis, Jr., Esquire
Reavis & McGrath
Sixth Floor - Broadway Plaza
700 South Flower Street
Los Angeles, California 90017

RE: MUR 1716
Brown for United States Senate
Committee and Burt Pines,
Treasurer

Dear Mr. Loomis:

The Federal Election Commission notified your client on June 6, 1984, of a complaint alleging violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). Copies of the complaint were forwarded to your client at that time. We acknowledge receipt of your client's explanation of this matter received July 24, 1984.

Upon review of the allegations contained in the complaint and information supplied by all respondents, the Commission, on December 11, 1984, determined that there is reason to believe that the Brown for United States Senate Committee and Burt Pines, as treasurer, ("Brown Committee") violated 2 U.S.C. § 441a(f), by accepting excessive contributions from the International Ladies' Garment Workers' Union Campaign Committee ("ILGWUCC").

Also, the Commission found reason to believe that the Brown Committee violated 2 U.S.C. § 441a(f), by accepting excessive contributions from the American Federation of Teachers Committee on Political Education ("AFT-COPE") and the Political Action Council of Educators (United Teachers - Los Angeles) ("PACE"), but determined to take no further action with regard to this violation.

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Roger D. Loomis, Jr., Esquire
Page 2

Finally, the Commission found no reason to believe that the Brown Committee violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from the Amalgamated Clothing and Textile Workers Union PAC ("ACTWU-PAC").

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your clients, the Office of General 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. §§ 438g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
Procedures

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 14, 1984

Max Zimny, Esquire
General Counsel
International Ladies' Garment Workers' Union
1710 Broadway
New York, New York 10019

RE: MUR 1716
International Ladies' Garment
Workers' Union Campaign
Committee and Lawrence Dock,
Treasurer

Dear Mr. Zimny:

The Federal Election Commission notified your client on June 6, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your client at that time. We acknowledge receipt of your client's explanation of this matter which was dated June 22, 1984.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on December 11, 1984, determined that there is reason to believe that International Ladies' Garment Workers' Union Campaign Committee and Lawrence Dock, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

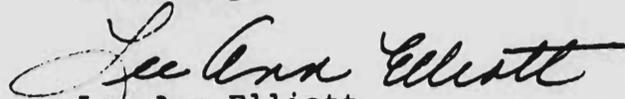
The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your client, the Office of General Counsel must proceed to the next compliance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

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Max Zimny, Esquire
Page 2

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

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
Procedures

86040583401



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE PEG
COMMISSIONAL SECRETARY

SENSITIVE

05 DEC 23 P 5: 12

December 23, 1985

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel *CNS*

SUBJECT: MUR 1716

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on December 17, 1985. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

- I. Brief
- II. Letter to Respondent

96040583402

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Brown for U.S. Senate) MUR 1716
Committee and Jodie Krajewski,)
as treasurer)

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

The Brown for U.S. Senate Committee ("Brown Committee") was the principal campaign committee of Edmund G. Brown for the 1982 primary and general elections. Jodie Krajewski is the treasurer of the Brown Committee. A complaint filed by James Edward Antosh ("complainant") alleged that the Brown Committee violated 2 U.S.C. § 441a(f) by accepting excessive contributions from the International Ladies' Garment Workers' Union Campaign Committee ("ILGWUCC", and from the American Federation of Teachers Committee on Political Education ("AFT-COPE") and the Political Action Council of Educators (United Teachers - Los Angeles) ("PACE"). In addition, the complainant alleged that the ILGWUCC, and AFT-COPE and PACE violated 2 U.S.C. § 441a(a)(2)(A) by making excessive contribution to the Brown Committee.

II. 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, exceeds \$5,000.

2 U.S.C. § 441a(f) prohibits a candidate or committee from knowingly accepting contributions in violation of the \$5,000 aggregate limitation imposed on contributions under this section.

Attachment I

①

85040503403

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

11 C.F.R. § 110.1(a) provides that a contribution designated in writing by the contributor for a particular election shall be attributed to that election. Except, that a contribution made after the primary election, shall be allowed only if the recipient committee has outstanding primary debts on the date of the contribution which are equal to or greater than the contributions. 11 C.F.R. § 110.1(a) further 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 are attributable to the general election if made after the date of the primary election.

11 C.F.R. § 104.14(d) provides that the treasurer of a political committee must timely and accurately file committee reports of receipts and disbursements.

On December 11, 1984, the Commission found reason to believe that the Brown Committee and Burt Pines, as treasurer, violated 2 U.S.C. § 441a(f) by accepting contribution from ILGWUC totalling \$1,000 in excess of limits at 2 U.S.C. § 441a(a)(2)(A).

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Therefore, the Office of General Counsel recommends that the Commission find probable cause to believe that Brown for U.S. Senate and Jodie Krajewski, as treasurer violated 2 U.S.C. § 441a(f).

III. General Counsel's Recommendations

1. Find probable cause to believe that the Brown for U.S. Senate Committee and Jodie Krajewski, as treasurer, violated 2 U.S.C. § 441a(f).
2. Approve the proposed letter.

Date

Charles N. Steele
General Counsel

Attachment I
③



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

William C. Oldaker, Esquire
Epstein, Becker, Borsody & Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 20036

RE: MUR 1716
Brown for United States Senate
Committee and Jodie Krajewski,
as treasurer

Dear Mr. Oldaker:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your clients the Federal Election Commission, on December 11, 1984, found reason to believe that Brown for U.S. Senate and its treasurer violated 2 U.S.C. § 441a(f).

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extension beyond 20 days.

Attachment II
(4)

86040363406

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

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

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

86040306407

Attachment II
(5)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 18, 1985

William C. Oldaker, Esquire
Epstein, Becker, Borsody & Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 20036

RE: MUR 1716
Brown for United States Senate
Committee and Jodie Krajewski,
as treasurer

Dear Mr. Oldaker:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your clients the Federal Election Commission, on December 11, 1984, found reason to believe that Brown for U.S. Senate and its treasurer violated 2 U.S.C. § 441a(f).

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

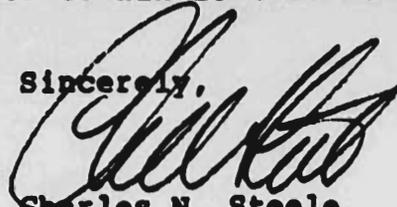
If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extension beyond 20 days.

86040553408

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

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

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

86040563409

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Brown for U.S. Senate) MUR 1716
Committee and Jodie Krajewski,)
as treasurer)

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

The Brown for U.S. Senate Committee ("Brown Committee") was the principal campaign committee of Edmund G. Brown for the 1982 primary and general elections. Jodie Krajewski is the treasurer of the Brown Committee. A complaint filed by James Edward Antosh ("complainant") alleged that the Brown Committee violated 2 U.S.C. § 441a(f) by accepting excessive contributions from the International Ladies' Garment Workers' Union Campaign Committee ("ILGWUC", and from the American Federation of Teachers Committee on Political Education ("AFT-COPE") and the Political Action Council of Educators (United Teachers - Los Angeles) ("PACE"). In addition, the complainant alleged that the ILGWUC, and AFT-COPE and PACE violated 2 U.S.C. § 441a(a)(2)(A) by making excessive contribution to the Brown Committee.

II. 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, exceeds \$5,000.

2 U.S.C. § 441a(f) prohibits a candidate or committee from knowingly accepting contributions in violation of the \$5,000 aggregate limitation imposed on contributions under this section.

86040563410

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

11 C.F.R. § 110.1(a) provides that a contribution designated in writing by the contributor for a particular election shall be attributed to that election. Except, that a contribution made after the primary election, shall be allowed only if the recipient committee has outstanding primary debts on the date of the contribution which are equal to or greater than the contributions. 11 C.F.R. § 110.1(a) further 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 are attributable to the general election if made after the date of the primary election.

11 C.F.R. § 104.14(d) provides that the treasurer of a political committee must timely and accurately file committee reports of receipts and disbursements.

On December 11, 1984, the Commission found reason to believe that the Brown Committee and Burt Pines, as treasurer, violated 2 U.S.C. § 441a(f) by accepting contribution from ILGWUCC totalling \$1,000 in excess of limits at 2 U.S.C. § 441a(a)(2)(A).

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Therefore, the Office of General Counsel recommends that the Commission find probable cause to believe that Brown for U.S. Senate and Jodie Krajewski, as treasurer violated 2 U.S.C. § 441a(f).

III. General Counsel's Recommendations

1. Find probable cause to believe that the Brown for U.S. Senate Committee and Jodie Krajewski, as treasurer, violated 2 U.S.C. § 441a(f).
2. Approve the proposed letter.

16 December 1948
Date



Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1985

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel *CS*

SUBJECT: MUR 1716

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on December 17, 1985. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

- I. Brief
- II. Letter to Respondent

86040563413

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
American Federation) MUR 1716
Teachers Committee on)
Political Education)
Robert G. Potter, Treasurer)

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

The American Federation Teachers Committee on Political Education ("AFT-COPE") is the separate segregated fund of the American Federation of Teachers. Robert G. Potter is the treasurer of AFT-COPE. A complaint filed by James Edward Antosh ("complainant") alleged that AFT-COPE violated 2 U.S.C. § 441a(a)(2)(A) by making excessive contributions to the Brown for U.S. Senate Committee ("Brown Committee").

II. 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, exceeds \$5,000.

2 U.S.C. § 441a(f) prohibits a candidate or committee from knowingly accepting contributions in violation of the \$5,000 aggregate limitation imposed on contributions under this section.

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

Attachment I
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11 C.F.R. § 110.1(a) provides that a contribution designated in writing by the contributor for a particular election shall be attributed to that election. Except, that a contribution made after the primary election, shall be allowed only if the recipient committee has outstanding primary debts on the date of the contribution which are equal to or greater than the contributions. 11 C.F.R. § 110.1(a) further 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 are attributable to the general election if made after the date of the primary election.

11 C.F.R. § 104.14(d) provides that the treasurer of a political committee must timely and accurately file committee reports of receipts and disbursements.

On December 11, 1984, the Commission found reason to believe that AFT-COPE and PACE were affiliated and, therefore, made contributions in excess of \$5,000 to the Brown Committee in violation of 2 U.S.C. § 441a(a)(2)(A). The Commission's determination of affiliation was based on (1) United Teachers-Los Angeles' association with AFT and with California Federation of Teachers, (2) the fact that a Vice President of AFT was also an officer of United Teachers-Los Angeles, and (3) many members of United Teachers-Los Angeles were also members of AFT.

85040303415

the Office

of General Counsel recommends proceeding to probable cause to believe.

III. General Counsel's Recommendations

1. Find probable cause to believe that the American Federation Teachers Committee on Political Education and Robert G. Porter, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).
2. Approve the proposed letter.

Date

Charles N. Steele
General Counsel

Attachment I

③

86040583416



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

William C. Oldaker, Esquire
Epstein, Becker, Borsody & Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 20036

RE: MUR 1716
American Federation Teachers
Committee on Political
Education and Robert G. Potter,
as treasurer

Dear Mr. Oldaker:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your clients the Federal Election Commission, on December 11, 1984, found reason to believe that American Federation Teachers Committee on Political Education and Robert G. Potter, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extension beyond 20 days.

Attachment II
(4)

86040563417

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

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

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8 6 0 4 0 7 6 3 4 1 8

Attachment II
⑤



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 17, 1985

William C. Oldaker, Esquire
Epstein, Becker, Borsody & Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 20036

RE: MUR 1716
American Federation Teachers
Committee on Political
Education and Robert G. Potter,
as treasurer

Dear Mr. Oldaker:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your clients the Federal Election Commission, on December 11, 1984, found reason to believe that American Federation Teachers Committee on Political Education and Robert G. Potter, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

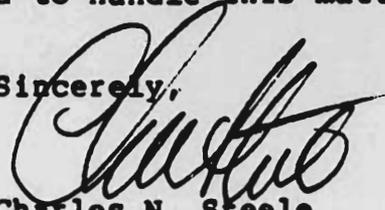
If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extension beyond 20 days.

85040563419

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

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

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

86040363420

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
American Federation) MUR 1716
Teachers Committee on)
Political Education)
Robert G. Potter, Treasurer)

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

The American Federation Teachers Committee on Political Education ("AFT-COPE") is the separate segregated fund of the American Federation of Teachers. Robert G. Potter is the treasurer of AFT-COPE. A complaint filed by James Edward Antosh ("complainant") alleged that AFT-COPE violated 2 U.S.C. § 441a(a)(2)(A) by making excessive contributions to the Brown for U.S. Senate Committee ("Brown Committee").

II. 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, exceeds \$5,000.

2 U.S.C. § 441a(f) prohibits a candidate or committee from knowingly accepting contributions in violation of the \$5,000 aggregate limitation imposed on contributions under this section.

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

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11 C.F.R. § 110.1(a) provides that a contribution designated in writing by the contributor for a particular election shall be attributed to that election. Except, that a contribution made after the primary election, shall be allowed only if the recipient committee has outstanding primary debts on the date of the contribution which are equal to or greater than the contributions. 11 C.F.R. § 110.1(a) further 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 are attributable to the general election if made after the date of the primary election.

11 C.F.R. § 104.14(d) provides that the treasurer of a political committee must timely and accurately file committee reports of receipts and disbursements.

On December 11, 1984, the Commission found reason to believe that AFT-COPE and PACE were affiliated and, therefore, made contributions in excess of \$5,000 to the Brown Committee in violation of 2 U.S.C. § 441a(a)(2)(A). The Commission's determination of affiliation was based on (1) United Teachers-Los Angeles' association with AFT and with California Federation of Teachers, (2) the fact that a Vice President of AFT was also an officer of United Teachers-Los Angeles, and (3) many members of United Teachers-Los Angeles were also members of AFT.

86040583422

the Office

of General Counsel recommends proceeding to probable cause to believe.

III. General Counsel's Recommendations

1. Find probable cause to believe that the American Federation Teachers Committee on Political Education and Robert G. Porter, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).
2. Approve the proposed letter.

16 December 1948
Date



Charles N. Steele
General Counsel

86040503423

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1716
Brown for United States Senate)
Committee and its treasurer,)
Burt Pines, et. al.)

CERTIFICATION

I, Marjorie W. Enmons, Secretary of the Federal Election Commission, do hereby certify that on December 11, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1716:

1. a) find reason to believe that the American Federation of Teachers Committee on Political Education and its treasurer, Robert G. Porter, violated 2 U.S.C. § 441a(a)(2)(A) by making an excessive contribution to Brown for U.S. Senate Committee.
- b) find reason to believe that the American Federation of Teachers Committee on Political Education and its treasurer, Robert G. Porter, violated 11 C.F.R. § 104.14(d) by failing to properly report a contribution which it gave to Brown for U.S. Senate Committee.
- c) enter into pre-probable cause conciliation with the American Federation of Teachers Committee on Political Education and its treasurer, Robert G. Porter.
- d) approve and authorize the sending of the conciliation agreement to the American Federation of Teachers Committee on Political Education and its treasurer, Robert G. Porter, as submitted with the General Counsel's Report signed December 6, 1984.

(Continued)

86040303424

2. a) find reason to believe that the Political Action Council of Educators (United Teachers-Los Angeles) and its treasurer, William Zimmerman, violated 2 U.S.C. § 441a(a)(2)(A) by making an excessive contribution to Brown for U.S. Senate Committee.
- b) enter into pre-probable cause conciliation with the Political Action Council of Educators (United Teachers-Los Angeles) and its treasurer, William Zimmerman.
- c) approve and authorize the sending of the conciliation agreement to the Political Action Council of Educators (United Teachers-Los Angeles) and its treasurer, William Zimmerman, as submitted with the General Counsel's Report signed December 6, 1984.
3. find reason to believe that Brown for U.S. Senate Committee and its treasurer, Burt Pines, violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from the American Federation of Teachers Committee on Political Education and the Political Action Council on Educators (United Teachers-Los Angeles) but take no further action.
4. a) find no reason to believe that Amalgamated Clothing and Textile Workers Union PAC and its treasurer, George Solomons, violated 2 U.S.C. § 441a(a)(2)(A) by making an excessive contribution to the Brown Committee.

(Continued)

86040503425

- b) find reason to believe that Amalgamated Clothing and Textile Workers Union PAC and its treasurer, George Solomons, violated 11 C.F.R. § 104.14(d) by failing to properly report a contribution which it gave to the Brown Committee, but take no further action.
5. find no reason to believe that Brown for U.S. Senate Committee and its treasurer, Burt Pines, violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from the Amalgamated Clothing and Textile Workers Union PAC.
6. find reason to believe that the International Ladies' Garment Workers' Union Campaign Committee and its treasurer, Lawrence Dock, violated 2 U.S.C. § 441a(a)(2)(A) by making an excessive contribution to the Brown for U.S. Senate Committee.
7. find reason to believe that the Brown for U.S. Senate Committee and its treasurer, Burt Pines, violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from the International Ladies' Garment Workers' Union Campaign Committee.
8. Approve and authorize the sending of the letters attached to the General Counsel's Report signed December 6, 1984.

(Continued)

86040563426

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

Attest:

12-12-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

8604033427

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

12-7-84, 9:56
12-7-84, 2:00

SENSITIVE

RECEIVED

THE FEC

SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

84 DEC 7 A9:56

Brown for United States Senate)
Committee and its treasurer, Burt Pines)
American Federation of Teachers)
Committee on Political Education)
and its treasurer, Robert G. Porter)
Political Action Council of Educators)
(United Teachers - Los Angeles)) MUR 1716
and its treasurer, William Zimmerman)
Amalgamated Clothing and Textile Workers)
Union PAC and its treasurer, George Solomons)
International Ladies' Garment Workers' Union)
Campaign Committee and its treasurer,)
Lawrence Dock)

GENERAL COUNSEL'S REPORT

On June 1, 1984, James Edward Antosh (the "Complainant") filed a complaint ("Attachment I, pp. 1-18) with the Federal Election Commission alleging that the Brown for U.S. Senate Committee (the "Brown Committee") accepted excessive contributions from a number of union political action committees. A summary of the complainants allegations are as follows:

1. Complainant alleges that the following political action committees and their treasurers violated 2 U.S.C. § 441a(a)(2)(A) by making excessive contributions to the Brown Committee during the 1982 California primary and general elections:

- a) American Federation of Teachers Committee on Political Education ("AFT-COPE"), treasurer Robert G. Porter and its alleged affiliate, Political Action Council of Educators (United Teachers - Los Angeles) ("PACE"), treasurer William Zimmerman.
- b) Amalgamated Clothing and Textile Workers Union PAC ("ACTWU-PAC"), treasurer George Solomons.
- c) International Ladies' Garment Workers' Union Campaign Committee ("ILGWUCC"), treasurer Lawrence Dock.

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2. Complainant alleges that Edmund G. Brown, Jr., the Brown for United States Senate Committee, and its treasurer, Burt Pines, violated 2 U.S.C. § 441a(f) for receipt of contributions in excess of limitations at 2 U.S.C. § 441a(a)(2)(A) from the above-named committees.

3. Complainant alleges the Brown Committee and PACE failed to accurately report the proper election designation for contributions in violation of 11 C.F.R. § 104.14(d).

Following receipt of the complaint the Brown Committee, AFT-COPE, and ACTWU-PAC requested an extension of time in which to respond. A response has now been submitted by the Brown Committee (Attachment II, pp. 19-88), by AFT-COPE (Attachment III, pp. 89-90), by PACE (Attachment IV, pp. 91-92), by ACTWU-PAC (Attachment V, pp. 93-106), and by ILGWUCC (Attachment VI, pp. 107-111). Also, the complainant submitted additional correspondence further explaining its complaint (Attachment VII, pp. 112-128).

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, exceeds \$5,000. 2 U.S.C. § 441a(f) prohibits a candidate or committee from knowingly accepting contributions in violation of the \$5,000 aggregate limitation imposed on contributions under this section.

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

11 C.F.R. § 110.1(a) provides that a contribution designated in writing by a contributor for a particular election shall be made attributable to that election. Except, that a contribution made after the primary election, shall be allowed only if the recipient committee has outstanding primary debts on the date of the contribution which are equal to or greater than the contribution. 11 C.F.R. § 110.1(a) further 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 are attributable to the general election if made after the date of the primary election.

11 C.F.R. § 104.14(d) provides that the treasurer of a political committee must timely and accurately file committee reports of receipts and disbursements.

A) AFT-COPE and PACE

A review of the reports filed with the Commission indicate that the following contributions were made by AFT-COPE and PACE to the Brown Committee.

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0

<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>
PACE	\$1,000	7/2/81	none	7/14/81	primary
PACE	\$1,000	4/5/82	none (dinner)	4/15/82	none
AFT-COPE	\$4,425 ^{1/}	5/26/82	primary	6/5/82	primary ^{2/}
AFT-COPE	\$ 575 ^{1/}	5/26/82	general	6/5/82	primary ^{2/}
AFT-COPE	\$4,425	8/12/82	general	8/18/82	general

The California primary election was June 5, 1982.

Complainant alleges that AFT-COPE and PACE are affiliated and therefore pursuant to 2 U.S.C. § 441a(a)(5) their contributions must be aggregated. Accordingly, complainant alleges that AFT-COPE and PACE made contributions to the Brown Committee for the primary election, in excess of the contribution limits.

AFT-COPE and PACE^{3/} respond stating that they are not affiliated. PACE states that its connected organization, United Teachers-Los Angeles is an independent autonomous

^{1/} This contribution was originally reported by AFT-COPE as a \$5000 contribution given on May 26, 1982, for the primary election. In an amended July Quarterly Report filed on August 10, 1982, AFT-COPE reported the \$5000 contribution as \$4,425 for the primary election and \$575 for the general election.

^{2/} The Brown Committee reported receiving a \$5000 contribution for the primary election on June 5, 1982.

^{3/} On September 21, 1983, the Reports Analysis Division informed PACE that its connected organization, United Teachers-Los Angeles, must be included in its name. PACE responded on October 5, 1983, indicating that in the future it was going to include United Teachers-Los Angeles in its name (Attachment IX, pp. 138-142).

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teachers union representing certified employees in the Los Angeles Unified School District in Los Angeles. The teachers who are members of United Teachers-Los Angeles individually determine as to whether they are to become members of the American Federation of Teachers or the National Education Association.

The Brown Committee also asserts that AFT-COPE and PACE are not affiliated. However, the Brown Committee states that even if the Commission finds that AFT-COPE and PACE are affiliated, there was no way the Brown Committee could have known or ascertained this fact. The Brown Committee states that it checked the status of all PACS which made contributions to it. Further, the Brown Committee states that the Statements of Organization of AFT-COPE and PACE do not list each other as affiliated committees.

AFT-COPE filed a Statement of Organization (Attachment VIII, p. 130) on October 18, 1976. The Statement of Organization said that a roster of local unions was attached and that each of these locals does or will have a political committee. However, a roster of local unions was not attached to the Statement of Organization.

PACE filed a Statement of Organization (Attachment IX, pp. 131-132) on November 6, 1974. It listed its connected organization as United Teachers-Los Angeles. On May 17, 1978 the Commission sent a letter to PACE (Attachment IX, pp. 134-136) asking if PACE was affiliated with the American Federation of Teachers Committee on Political Education (AFT-COPE) or the National Education Association Political Action Committee (NEA-

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the American Federation of Teachers, the Office of General Counsel recommends that there is reason to believe that AFT-COPE and PACE are affiliated.

The \$5,000 contribution given by AFT-COPE on May 26, 1982, was originally reported by AFT-COPE, for the primary election. In August, AFT-COPE amended its reports and reported \$4,425 for the primary election and \$575 for the general election. Since the \$5,000 contribution was given before the primary, the entire amount must be designated for the primary election unless the contribution complies with 11 C.F.R. § 110.1(a)(2). That provision requires that the designation must be in writing and contemporaneously communicated to the recipient with the contribution. The Brown Committee explains that the contribution was made by AFT-COPE in a lump sum check of \$5,000 and that it had no way of knowing that AFT-COPE would later amend its reports to split this contribution.

Since AFT-COPE did not inform the Brown Committee in writing at the time it was giving the contribution that \$575 was to be designated for the general election, the entire \$5,000 contribution must be attributed for the primary election. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that AFT-COPE and PACE have violated 2 U.S.C. § 441a(a)(2)(A) by making a \$7,000 contribution to the Brown Committee for the primary election which is in excess of the limits by \$2,000. Further, the Office of General

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Counsel recommends that the Commission find reason to believe that AFT-COPE violated 11 C.F.R. § 104.14(d) by not reporting the \$575 for the primary election. Also, the Office of General Counsel notes that PACE failed to check either the primary or general box on its reports for its July 2, 1981, \$1,000 contribution and its April 5, 1982, \$1,000 contribution.

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If AFT-COPE and PACE have made an excessive contribution to the Brown Committee then it follows that the Brown Committee has violated 2 U.S.C. §441a(f) for receipt of an excessive contribution. However, the Office of General Counsel is cognizant of the Brown Committee's statement that it attempted to check the status of all political committees from which it

received contributions and that the affiliation between AFT-COPE and PACE could not be easily ascertained by the Brown Committee. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that the Brown Committee violated 2 U.S.C. §441a(f) for accepting an excessive contribution from AFT-COPE and PACE, but take no further action.

Also, the Brown Committee failed to check either the primary or general election box on its report for the April 5, 1982, contribution of \$1,000 received from PACE. The primary box should have been checked. On August 4, 1984, the Brown Committee filed an amended report in which it checked the primary election box.

B. ACTWU-PAC

A review of the reports filed with the Commission indicate that the following contributions were made by ACTWU-PAC to the Brown 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>
ACTWU-PAC	\$ 5,000	5/17/82	primary	5/27/82	primary
ACTWU-PAC	\$ 1,000	10/18/82	primary	11/4/82	general

The California primary election was held on June 5, 1982.

Complainant alleges that ACTWU-PAC, by making a \$1,000 contribution on October 18, 1982, and designating it for the primary election in its reports, exceeded the 2 U.S.C. §441a(a)(2)(A) contribution limit for Brown's primary election by

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\$1,000. ACTWU-PAC in its response claims that the designation of this contribution as a primary contribution was a "clerical error" and that it intended the contribution to be for the general election. ACTWU-PAC further states that since the \$1,000 was given four months after the primary election, and since neither the check nor the letter which accompanied it designated the contribution for a particular election, the presumption as set forth in 11 C.F.R. § 110.1(a)(2)(ii)(B) is that the contribution is for the general election. ACTWU-PAC submitted a copy of the check and a copy of the letter which accompanied the check as part of its response to the complaint. ACTWU-PAC also submitted an amended report in which the \$1,000 contribution is reported as being for the general election.

The Brown Committee responded by stating that as ACTWU-PAC has made clear in its response, the \$1,000 contribution was made after the primary election and was intended for the general election.

Since the \$1,000 contribution was given after the primary election, the contribution must be attributed to the general election, unless the contributor informs the recipient in writing at the time the contribution is given that it is for the primary election. In this instance the contributor did not communicate to the recipient that the contribution was for the primary election, and in fact the contributor states that its intent was to give the contribution for the general election. Further, a

11 C.F.R. § 110.1(a) provides that a contribution made after the election shall be allowed only if the recipient committee has outstanding primary debts. Since the Brown Committee did not have primary debts on the date of the contribution, the \$1,000 contribution must therefore be attributed to the general election.

Accordingly, the Office of General Counsel recommends that the Commission find no reason to believe that ACTWU-PAC violated 2 U.S.C. § 441a(a)(2)(A) by making an excessive contribution to the Brown Committee and no reason to believe that the Brown Committee violated 2 U.S.C. § 441a(f).

With regard to 11 C.F.R. § 104.14(d), ACTWU-PAC failed to properly report the \$1000 contribution as being for the general election. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that ACTWU-PAC violated 11 C.F.R. § 104.14(d). However, since ACTWU-PAC has filed an amended report designating the contribution for the general election, the Office of General Counsel recommends that the Commission take no further action.

C. ILGWUCC

A review of the reports filed with the Commission indicate that the following contributions were made by ILGWUCC to the Brown 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>
ILGWUCC	\$ 4,000	4/14/84	primary	4/21/82	primary
ILGWUCC	\$ 1,000	8/16/82	general	10/8/82	general
ILGWUCC	\$ 4,000	8/27/82	general	9/29/82	general
ILGWUCC	\$ <u>1,000</u>	10/6/82	general	10/8/82	general

The California primary election was June 5, 1982.

In response to the complaint ILGWUCC submitted an affidavit of Evelyn Dubrow. Ms. Dubrow states that in early October 1982 she was informed that the Brown Committee needed additional contributions to overcome a primary election deficiency and that she instructed an employee of ILGWUCC by phone to make a \$1,000 contribution to the Brown Committee for the primary election. The ILGWUCC employee sent the contribution but erroneously noted it for the general election. Therefore, Ms. Dubrow asserts that ILGWUCC's intention was to make a \$1,000 contribution to the Brown Committee primary election. ILGWUCC amended its reports on June 12, 1984, to designate the \$1,000 contribution of August 16, 1982, for the primary election.

Since the \$1,000 contribution of October 6, 1982, was given after the primary election, the contribution must be designated for the general election unless the contributor complies with 11 C.F.R. § 110.1(a)(2). That provision requires that the

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designation must be in writing and contemporaneously communicated to the recipient with the contribution. Since ILGWUCC did not inform the Brown Committee in writing at the time it was giving the contribution that the \$1,000 was to be designated for the primary election, the contribution must be attributed to the general election.

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The response of the Brown Committee states that it received a contribution of \$4,000, from the ILGWUCC on September 29, 1982, for the general election. This contribution was properly recorded as a contribution from the International Ladies' Garment Workers' Union. The Brown Committee states that it received two additional contributions of \$1,000 each from the ILGWUCC on October 8, 1982. These contributions were designated for the general election. Due to a clerical error, these contributions were reported as being received from the "ILGWU." The Brown

Committee explains that the fact that the previous contribution had been recorded as received from the Internatonal Ladies' Garment Workers' Union, rather than the abbreviated "ILGWU," facilitated the clerical error that misled the Brown Committee into believing that the \$4,000 contribution and the two \$1,000 contributions were received from two separate organizations and, therefore, were within the \$5,000 contribution limit. When the Brown Committee learned of this error it refunded the excess contribution of \$1,000 to ILGWUCC.

Accordingly, the office of General Counsel recommends that the Commission find reason to believe that ILGWUCC violated 2 U.S.C. § 441a(a)(2)(A) by making a \$6000 contribution to the Brown Committee for the primary election which is \$1000 in excess of the limits and that the Brown Committee violated 2 U.S.C. § 441a(f) by receiving such contribution.

RECOMMENDATIONS

A. The Office of General Counsel recommends that the Commission--

1. a) find reason to believe that the American Federation of Teachers Committee on Political Education and its treasurer, Robert G. Porter, violated 2 U.S.C. § 441a(a)(2)(A) by making an excessive contribution to Brown for U.S. Senate Committee;
- b) find reason to believe that the American Federation of Teachers Committee on Political Education and its treasurer, Robert G. Porter, violated 11 C.F.R. § 104.14(d) by failing to properly report a contribution which it gave to Brown for U.S. Senate Committee.

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c) enter into pre-probable cause conciliation with the American Federation of Teachers Committee on Political Education and its treasurer, Robert G. Porter; and,
d) approve and authorize the sending of the attached conciliation agreement to the American Federation of Teachers Committee on Political Education and its treasurer, Robert G. Porter; and,

2. a) find reason to believe that the Political Action Council of Educators (United Teachers-Los Angeles) and its treasurer, William Zimmerman, violated 2 U.S.C. § 441a(a)(2)(A) by making an excessive contribution to Brown for U.S. Senate Committee;

b) enter into pre-probable cause conciliation with the Political Action Council of Educators (United Teachers-Los Angeles) and its treasurer, William Zimmerman; and,

c) approve and authorize the sending of the attached conciliation agreement to the Political Action Council of Educators (United Teachers-Los Angeles) and its treasurer, William Zimmerman; and,

3. find reason to believe that Brown for U.S. Senate Committee and its treasurer, Burt Pines, violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from the American Federation of Teachers Committee on Political Education and the Political Action Council on Educators (United Teachers-Los Angeles) but take no further action;

B) The Office of General Counsel recommends that the Commission--

1) a) find no reason to believe that Amalgamated Clothing and Textile Workers Union PAC and its treasurer, George Solomons, violated 2 U.S.C. § 441a(a)(2)(2)(A) by making an excessive contribution to the Brown Committee; and,

b) find reason to believe that Amalgamated Clothing and Textile Workers Union PAC and its treasurer, George Solomons, violated 11 C.F.R. § 104.14(d) by failing to properly report a contribution which it gave to the Brown Committee, but take no further action; and,

2) find no reason to believe that Brown for U.S. Seante Committee and its treasurer, Burt Pines, violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from the Amalgamated Clothing and Textiles Workers Union PAC.

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C) The Office of General Counsel recommends that the Commission-

- 1) find reason to believe that the International Ladies' Garment Workers' Union Campaign Committee and its treasurer, Lawrence Dock, violated 2 U.S.C. § 441a(a)(2)(A) by making an excessive contribution to the Brown for U.S. Senate Committee; and,
- 2) find reason to believe that the Brown for U.S. Senate Committee and its treasurer, Burt Pines, violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from the International Ladies' Garment Workers' Union Campaign Committee.

D) The Office of General Counsel recommends that the Commission approve and authorize the sending of the attached letters.

Charles N. Steele
General Counsel

Nov 6, 1954
Date

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

Attachments

- I. Antosh Complaint (1-18)
- II. Response of Brown Committee (19-88)
- III. Response of AFT-COPE (89-90)
- IV. Resonse of PACE (91-92)
- V. Response of ACTWU-PAC (93-106)
- VI. Response of ILGWUCC (107-111)
- VII. Additional Antosh Correspondence Re: Complaint (112-128)
- VIII. AFT-COPE Reports (Microfilm) (130)
- IX. PACE Reports (Microfilm) (131-142)
- XI. Proposed letters (146-155)
- XII. Proposed Conciliation Agreements (156-164).

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

James Edward Antosh
13 Gilpin
Shawnee, Oklahoma 74801

Complainant,

v.

Edmund G. Brown, Jr.; Brown for
U.S. Senate; American Federation
of Teachers, Committee on
Political Education and its
affiliated separate segregated
fund, Political Action Council
of Educators; Amalgamated
Clothing and Textile Workers
Union Political Action Committee;
International Ladies Garment
Workers Union Campaign Committee,
and all the Committees'
treasurers,

Respondents.

Complaint
MUR No. 1716

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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, Edmund G. Brown, Jr.; Brown for U.S. Senate; American Federation of Teachers, Committee on Political Education ("AFT-COPE") and its affiliated separate segregated fund ("SSF"), Political Action Council of Educators ("PACE"); Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC"); International Ladies Garment Workers Union Campaign Committee ("ILGWUCC") 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) during either the general or the primary election cycles.

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. Edmund G. Brown, Jr.,
1125 W. Sixth Street
Los Angeles, California 90017 and,

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630 Shatto Place
Los Angeles, California 90005.

- b. Burt Pines, individually and in his capacity as treasurer of Brown for U.S. Senate,

1125 W. Sixth Street
Los Angeles, California 90017 and,

630 Shatto Place
Los Angeles, California 90005.

- c. Jules Glazer, individually and in his capacity as treasurer of Brown for U.S. Senate,

1125 W. Sixth Street
Los Angeles, California 90017 and,

630 Shatto Place
Los Angeles, California 90005.

- d. Brown for U.S. Senate,

1125 W. Sixth Street
Los Angeles, California 90017 and,

630 Shatto Place
Los Angeles, California 90005.

- e. Robert G. Porter, individually and in his capacity as treasurer of American Federation of Teachers, Committee on Political Education,
11 Dupont Circle, N.W.
Washington, D.C. 20036.

- f. American Federation of Teachers, Committee on Political Education,
11 Dupont Circle, N.W.
Washington, D.C. 20036.

- g. William Zimmerman, individually and in his capacity as treasurer of Political Action Council of Educators,
2511 W. 3rd Street
Los Angeles, California 90057.

- h. Political Action Council of Educators,
2511 W. 3rd Street
Los Angeles, California 90057.

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- i. George Solomons, individually and in his capacity as treasurer of Amagamated Clothing and Textile Workers Union Political Action Committee, 15 Union Square New York, New York 10003.
- j. Amagamated Clothing and Textile Workers Union Political Action Committee, 15 Union Square New York, New York 10003.
- k. Lawrence Dock, individually and in his capacity as treasurer of International Ladies Garment Workers Union Campaign Committee, 1710 Broadway New York, New York 10019.
- l. International Ladies Garment Workers Union Campaign Committee, 1710 Broadway New York, New York 10019.

III. LIABILITY

3. Liability may be imposed upon the candidate, Edmund G. Brown, Jr.; Brown for U.S. Senate; AFT-COPE and its affiliated SSF, PACE; ACTWU-PAC; and ILGWUCC pursuant to 2 U.S.C. §441a(a) which establishes the \$5,000.00 (FIVE THOUSAND DOLLAR) 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 AFT-COPE and its affiliated SSF, PACE, are treated as contributions made

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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 primary election or an excess of \$5,000.00 (FIVE THOUSAND DOLLARS) for the 1982 federal general in which Edmund G. Brown, Jr. 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 Edmund G. Brown, Jr.; Brown for U.S. Senate; AFT-COPE and its affiliated SSF, PACE; and ACTWU-PAC filed for the 1982 federal primary election; and which Edmund G. Brown, Jr., Brown for U.S. Senate and ILGWUCC filed for the 1982 federal general election.

7. For the 1982 federal primary election, excessive funds were contributed to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer by AFT-COPE and its treasurer; PACE and its treasurer; and ACTWU-PAC and its treasurer. For the 1982 federal general election, excessive funds were contributed to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer by ILGWUCC and its treasurer.

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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 BROWN FOR U.S. SENATE IN THE 1982 FEDERAL PRIMARY AND GENERAL ELECTIONS

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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, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal primary election from AFT-COPE and its affiliated SSF, PACE, in the amount of \$11,425.00 (ELEVEN THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLARS).

10. Candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, for the 1982 federal primary election, accepted contributions from AFT-COPE and its affiliated SSF, PACE, in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>Contributor</u>	<u>F.E.C. Microfilm Location</u>
7/14/81	\$1,000.00	PACE	82020032018
4/15/82 <i>oil</i>	\$1,000.00	PACE	82020071976- <i>No</i>
6/5/82	\$5,000.00	AFT-COPE	82020103644
8/18/82	<u>\$4,425.00</u>	AFT-COPE	82020154239 - <i>For Primary per AFT-COPE</i>
Total	\$11,425.00		

11. A running total of the amount of contributions received from AFT-COPE and its affiliated SSF, PACE, would have put on notice Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer that they had received \$2,000.00 (TWO THOUSAND DOLLARS) on April 15, 1982. On that date, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer were only permitted to accept an additional contribution of \$3,000.00 (THREE THOUSAND 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.

12. PACE and its treasurer failed to designate whether the \$1,000.00 (ONE THOUSAND DOLLAR) contribution made on April 5, 1982 was intended for the primary or the general election. (See F.E.C. Microfilm # 32032421201). However, the contribution was made more than two months before the California Congressional primary election which was held on June 8, 1982. Therefore, the contribution is considered a contribution for the primary election in accordance with 11 C.F.R. §110.1(a)(2)(ii)(A).

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In violation of 11 C.F.R. §104.14(d), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer failed to designate whether the contribution was for the primary or the general election. (See F.E.C. Microfilm # 8200071976). 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 or statement contained therein."

13. Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer failed to accurately report the \$4,425.00 (FOUR THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLAR) contribution of May 26, 1982 which was designated by AFT-COPE as a contribution for the primary election. (See F.E.C. Microfilm # 82032404238). In violation of 11 C.F.R. §104.14(d), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer reported it as a contribution for the general election. (See F.E.C. Microfilm # 82020154239). 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 or statement contained therein." Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer knowingly misreported the contribution in order to accept contributions in excess of the statutory limit.

14. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable

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amendments, which Respondents filed with the Federal Election Commission, Complainant believes that candidate for public office, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal primary election from ACTWU-PAC in the amount of \$6,000.00 (SIX THOUSAND DOLLARS).

15. Candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, for the 1982 federal primary election, accepted contributions from ACTWU-PAC in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>F.E.C. Microfilm Location</u>
5/27/82	\$5,000.00	82020103644
11/4/82	<u>\$1,000.00</u>	82020191641
Total	\$6,000.00	

16. A running total of contributions from ACTWU-PAC would have put on notice Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer that they had received \$5,000.00 (FIVE THOUSAND DOLLARS) on May 27, 1982. On that date, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer could no longer lawfully accept any contributions from ACTWU-PAC. In violation of 2 U.S.C. §441a(f), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer accepted a contribution from this contributor in the amount of \$1,000.00 (ONE THOUSAND DOLLARS). This amount

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exceeded the statutory monetary ceiling by \$1,000.00 (ONE THOUSAND DOLLARS).

17. Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer failed to accurately report the \$1,000.00 (ONE THOUSAND DOLLAR) contribution of October 18, 1982 which was designated by ACTWU-PAC as a contribution for the primary election. (See F.E.C. Microfilm # 82032583602). In violation of 11 C.F.R. §104.14(d), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer reported it as a contribution for the general election. (See F.E.C. Microfilm # 82020191641). 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 or statement contained therein." Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer knowingly misreported the contribution in order to accept contributions in excess of the statutory limit.

18. 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, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal general election from ILGWUC in the amount of \$6,000.00 (SIX THOUSAND DOLLARS).

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19. Candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, for the 1982 federal general election, accepted contributions from ILGWUCC in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>F.E.C. Microfilm Location</u>
9/29/82	\$4,000.00	82020154242
10/8/82	\$1,000.00	82020154504
10/8/82	<u>\$.1,000.00</u>	82020154504
Total	\$6,000.00	

20. A running total of contributions from ILGWUCC would have put on notice Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer that they had received \$4,000.00 (FOUR THOUSAND DOLLARS) on September 29, 1982. On that date, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer were only permitted to accept an additional contribution of \$1,000.00 (ONE THOUSAND DOLLARS). In violation of 2 U.S.C. §441a(f), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer accepted two contributions from this contributor in the amounts of \$1,000.00 (ONE THOUSAND DOLLARS). This amount exceeded the statutory monetary ceiling by \$1,000.00 (ONE THOUSAND DOLLARS).

**VI. VIOLATIONS OF THE F.E.C.A. BY
AFT-COPE AND PACE IN THE
1982 FEDERAL PRIMARY ELECTION**

21. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable

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amendments, which Respondents filed with the Federal Election Commission, the Complainant believes that AFT-COPE and its affiliated SSF, PACE, for the 1982 federal primary election contributed to candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer a total of \$11,425.00 (ELEVEN THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLARS).

22. AFT-COPE and PACE contributed the following amounts:

a. On July 2, 1981, PACE contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 81032092497).

b. On April 5, 1982, PACE contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032421201).

c. On May 26, 1982, AFT-COPE contributed \$5,000.00 (FIVE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032361583).

d. On May 26, 1982, AFT-COPE contributed \$4,425.00 (FOUR THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLARS). (See F.E.C. Microfilm # 82032404238).

23. A running total of contributions made to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer would have put on notice AFT-COPE and its affiliated SSF, PACE, that as of April 5, 1982, they had contributed \$2,000.00 (TWO THOUSAND DOLLARS) and that they could only contribute an additional \$3,000.00 (THREE THOUSAND DOLLARS) if they wished to meet the mandates of the law. In violation of 2 U.S.C. y441a(a)(2)(A), a \$5,000.00 (FIVE THOUSAND DOLLAR) contribution and a \$4,425.00 (FOUR THOUSAND

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FOUR HUNDRED TWENTY-FIVE DOLLAR) contribution was made to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer. This amount exceeded the statutory monetary ceiling by \$6,425.00 (SIX THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLARS).

24. PACE and its treasurer failed to accurately report the \$1,000.00 (ONE THOUSAND DOLLAR) contribution of July 2, 1981 and the \$1,000.00 (ONE THOUSAND DOLLAR) contribution of April 5, 1982. In violation of 11 C.F.R. §104.14(d), PACE and its treasurer failed to designate whether the contributions were intended for the primary or the general election. (See F.E.C. Microfilm #s 81032092497 and 82032421201). Since the contributions were made before the California Congressional primary election which was held on June 8, 1982, they are considered contributions for the primary election in accordance with 11 C.F.R. §110.1(a)(2)(ii)(A). 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 or statement contained therein."

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VII. VIOLATIONS OF THE F.E.C.A. BY ACTWU-PAC IN THE 1982 FEDERAL PRIMARY ELECTION

25. 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 ACTWU-PAC for the 1982 federal primary election contributed to candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer a total of \$6,000.00 (SIX THOUSAND DOLLARS).

26. ACTWU-PAC contributed the following amounts:

a. On May 17, 1982, ACTWU-PAC contributed \$5,000.00 (FIVE THOUSAND DOLLARS). (See F.E.C. Microfilm # 8203233536).

b. On October 18, 1982, ACTWU-PAC contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032583602).

27. A running total of the amount contributed to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer by ACTWU-PAC would have put it on notice that as of May 17, 1982, it had contributed \$5,000.00 (FIVE THOUSAND DOLLARS). In violation of 2 U.S.C. §441a(a)(2)(A), ACTWU-PAC made a \$1,000.00 (ONE THOUSAND DOLLAR) contribution on October 18, 1982, which exceeded the \$5,000.00 (FIVE THOUSAND DOLLAR) ceiling by \$1,000.00 (ONE THOUSAND DOLLARS).

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VII. VIOLATIONS OF THE F.E.C.A.
BY
ILGWUCC
IN THE
1982 FEDERAL GENERAL ELECTION

28. 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 ILGWUCC for the 1982 federal general election contributed to candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer a total of \$6,000.00 (SIX THOUSAND DOLLARS).

- 29. ILGWUCC contributed the following amounts:
 - a. On August 16, 1982, ILGWUCC contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032435073).
 - b. On August 27, 1982, ILGWUCC contributed \$4,000.00 (FOUR THOUSAND DOLLARS). (See F.E.C. Microfilm # 82033435081).
 - c. On October 6, 1982, ILGWUCC contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032500143).

30. A running total of the amount contributed to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer by ILGWUCC would have put it on notice that as of August 27, 1982, it had contributed \$5,000.00 (FIVE THOUSAND DOLLARS). In violation of 2 U.S.C. §441a(a)(2)(A), ILGWUCC made a \$1,000.00 (ONE THOUSAND DOLLAR)

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contribution on October 6, 1982, which exceeded the \$5,000.00 (FIVE THOUSAND DOLLAR) ceiling by \$1,000.00 (ONE THOUSAND DOLLARS).

IX. CONCLUSION

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

32. 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
Michael Ernest Avakian
Center on National Labor Policy

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

Attorneys for Complainant

June 1, 1984

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VERIFICATION OF CITIZEN COMPLAINANT

Shawnee)
)
State of Oklahoma) ss.

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

James Edward Antosh

Subscribed and sworn to before me this 21st day of May 1984.

Marion K. [Signature]
Notary Public

My Commission expires:
My Commission Expires Sept. 17, 1986

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DESIGNATION OF COUNSEL

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

Nov. 21 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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GC#442

ATTACHMENT

REC'D OGC
(HAND DELIVERY)

II

7/24/84
7:20 p.m.

(19)

1 REAVIS & McGRATH
 2 A Partnership Including
 3 Professional Corporations
 4 Sixth Floor - Broadway Plaza
 5 700 South Flower Street
 6 Los Angeles, California 90017
 7 Telephone: (213) 626-5241

8 Attorneys for Edmund G. Brown, Jr., Brown For U.S. Senate
 9 Committee, Jules Glazer, and Burt Pines

BEFORE THE FEDERAL ELECTION COMMISSION

11	In the Matter of)	MUR 1716
12	JAMES EDWARD ANTOSH)	REPLY OF EDMUND G. BROWN, JR.,
13	v.)	BROWN FOR U.S. SENATE
14	EDMUND G. BROWN, JR., <u>et al.</u>)	COMMITTEE, JULES GLAZER
)	AND BURT PINES, TO COMPLAINT
)	OF JAMES EDWARD ANTOSH

I.

INTRODUCTION.

18 By its letter dated June 6, 1984, to Edmund G. Brown,
 19 Jr., the Federal Election Commission (the "Commission") informed
 20 Edmund G. Brown, Jr., the Brown For U.S. Senate Committee (the
 21 "Committee"), Burt Pines, Jules Glazer (collectively, the "Com-
 22 mittee Group"), and various political action committees (the
 23 "PACs") that a complaint (the "Complaint") had been filed
 24 against them with the Commission. The Complaint alleges that
 25 the Committee Group violated Section 441a(f) of the Federal
 26 Election Campaign Act of 1971, as amended (the "Act"), and Sec-
 27 tion 104.14(d) of the Federal Election Commission Rules of 1983
 28 by knowingly accepting contributions in excess of the statutory

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1 by knowingly accepting contributions in excess of the statutory
2 limits and inaccurately reporting contributions received.

3 II.

4 FACTS.

5 The Complaint essentially makes six separate allega-
6 tions of violations of 2 U.S.C. 441a(f) and 11 C.F.R. 104.14(d)
7 against the Committee Group: (1) acceptance of excessive con-
8 tributions from affiliated PACs (AFT-COPE and PACE) (see Section
9 IIIA, below); (2) failure to designate a \$1,000 contribution
10 from PACE as for the primary (see Section IIIB, below);
11 (3) designation of a \$4,425 contribution from AFT-COPE as for
12 the general election (see Section IIIC, below); (4) acceptance
13 of excessive contributions from the ACTWU (see Section IIID,
14 below); (5) improper designation of contributions from the ACTWU
15 as for the general election (see Section IIIE, below); and (6)-
16 acceptance of excessive contributions from the ILGWUCC (see Sec-
17 tion IIIF, below). As discussed below, none of these allega-
18 tions are meritorious. Furthermore, even if the allegations
19 were to constitute technical violations of the Act, the Com-
20 mittee Group's good faith is obvious and precludes a finding of
21 a violation with respect to each of the allegations.

22 During the period in which the alleged violations
23 occurred, the Committee received more than 25,000 checks
24 representing total contributions of approximately \$5.5 million.
25 Despite this enormous volume and the fact that, in keeping with
26 the spirit of the Act, the Committee is staffed primarily with
27 volunteers, the Committee has been meticulous in its reporting
28 of contributions received. The Committee Group at all times

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1 demonstrated good faith and utilized its best efforts to comply
2 with the Act.

3 III.

4 THE COMMITTEE GROUP DID NOT
5 COMMIT THE VIOLATIONS ALLEGED.

6 A. The Committee Group Did Not Knowingly Accept Contributions
7 From the American Federation of Teachers Committee On
8 Political Education ("AFT-COPE") and the Political Action
9 Council Of Educators ("PACE") in Violation of 2 U.S.C.
10 § 441a(f).

11 The Complaint alleges that the Committee Group
12 violated 2 U.S.C. § 441a(f) by accepting \$11,425 from AFT-COPE
13 and PACE (see Complaint, p. 6, attached hereto as Exhibit A).
14 The Complaint further alleges that "[f]or the purposes of this
15 complaint, contributions made by AFT-COPE and its affiliated
16 separate segregated fund, PACE, are treated as contributions
17 made from a single committee in accordance with 2 U.S.C.
18 § 441a(a)(5) as implemented through 11 C.F.R. § 100.5
19 (g)(i)(B)." (See Complaint, pp. 4-5.)

20 2 U.S.C. § 441a(f) states that no candidate or
21 political committee shall knowingly accept any contribution from
22 a multicandidate political committee with respect to any elec-
23 tion in excess of \$5,000. 2 U.S.C. § 441a(a)(5) states that for
24 the purposes of these limitations, all contributions made by
25 political committees established or financed or maintained or
26 controlled by any labor organization, including any parent, sub-
27 sidiary, branch, division, department, or local unit of such

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1 labor organization, shall be considered to have been made by a
2 single political committee.

3 The two PACs, AFT-COPE and PACE, are not affiliated.
4 This argument is presented succinctly in the Brief of AFT, dated
5 July 23, 1984.

6 In addition, upon receipt of the Complaint, Carmen
7 Robledo, a staff member of the Brown For U.S. Senate Committee,
8 telephoned the headquarters of PACE and was informed that PACE
9 and AFT-COPE were not affiliated organizations. (See Affidavit
10 of Carmen Robledo, attached hereto as Exhibit D.) Ms. Robledo
11 also telephoned the Commission and was informed that PACE and
12 AFT-COPE were not considered affiliated organizations.

13 Even if the Commission subsequently determines that
14 PACE and AFT-COPE are affiliated, there was no possible way the
15 Committee could have ascertained this fact. The Committee used
16 every means available to it to check the status of these PACs.
17 In accordance with established procedures (see Procedures For
18 Deposits, attached hereto as Exhibit B), volunteers telephoned
19 the Commission when they received the contributions from the
20 PACs and recorded the identification number of the PACs. The
21 numbers of AFT-COPE and PACE are not the same (AFT-COPE
22 # C00028860, PACE # C00023754). Moreover, the registration
23 statements of PACE do not list AFT-COPE as an affiliated or con-
24 nected organization. (See Exhibit C.) Certainly, when the Com-
25 mission itself states that PACE and AFT-COPE are not affiliated,
26 the Committee cannot be expected to determine differently.
27 Because the Committee relied in good faith on all available
28 documents, the representations of the PACs involved, and the

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1 representations of the Commission itself, the Committee Group
 2 should not be found to be in violation of 2 U.S.C. § 441a(f)
 3 even should the Commission subsequently determine that PACE and
 4 AFT-COPE are affiliated. In reliance on the fact that PACE and
 5 AFT-COPE were not affiliated, the Committee accepted \$5,000 for
 6 the primary election from AFT-COPE, \$4,425 for the general elec-
 7 tion from AFT-COPE, and \$2,000 for the primary election from
 8 PACE. (See Exhibit E.) All of these contributions are within
 9 the limitations of 2 U.S.C. §§ 441a(a)(2)(A) and 441a(f). The
 10 Committee Group therefore did not violate 2 U.S.C. § 441a(f).

11 B. The Committee Treasurer Properly Designated the \$1,000
 12 Contribution Made by PACE on April 5, 1982, As Intended For
 13 The Primary Election.

14 The Complaint alleges that the Committee Treasurer
 15 violated 11 C.F.R. § 104.14(d) by failing to designate whether a
 16 \$1,000 contribution made by PACE on April 5, 1982, was received
 17 for the primary or general election. (See Complaint, pp. 7-8.)
 18 This allegation is false.

19 11 C.F.R. § 104.14(d) states that each treasurer of a
 20 political committee, and any other person required to file any
 21 report or statement under the Act, shall be personally respon-
 22 sible for the accuracy of any information or statement contained
 23 in it.

24 The Committee clearly designated the \$1,000 contribu-
 25 tion made by PACE on April 5, 1982, and received by the Com-
 26 mittee on April 15, 1982, as for the primary election. (See
 27 Exhibit-F.)

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1 C. The Committee Treasurer Properly Designated the \$5,000
2 Contribution From AFT-COPE of May 26, 1982 as Received for
3 the Primary Election.

4 The Complaint alleges that the Committee Treasurer
5 violated 11 C.F.R. § 104.14(d) by representing a contribution of
6 \$4,425 made by AFT-COPE on May 26, 1982, and designated by
7 AFT-COPE for the primary election, as a contribution for the
8 general election. (See Complaint, p. 8.)

9 This allegation is untrue.

10 11 C.F.R. § 104.14(d) states that each treasurer of a
11 political committee, and any other person required to file any
12 report or statement under the Act shall be personally respon-
13 sible for the accuracy of any information or statement contained
14 in it.

15 AFT-COPE made a contribution of \$5,000 on May 26,
16 1982, to the Committee. (See Exhibit G.)

17 According to documents filed with the Commission by
18 AFT-COPE, \$4,425 of this contribution was intended for the
19 primary election and \$575 was intended for the general election.
20 (See Exhibit H.) The Committee had no way of knowing this, and
21 so reported the entire \$5,000 contribution as received for the
22 primary election. (See Exhibit I.)

23 On August 1, 1982, AFT-COPE made another contribution
24 for \$4,425, this time designated for the general election. This
25 contribution was received on August 18, 1982, and properly
26 reported by the Committee. (See Exhibit J.)

27 Reporting the entire \$5,000 contribution received on
28 June 5, 1982, as a contribution for the primary election was a

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1 harmless error. The reporting in no way affects the
2 contribution limits.

3 Moreover, 2 U.S.C. § 432(h)(2)(i) states that "[w]hen
4 the treasurer of a political committee shows that best efforts
5 have been used to obtain, maintain, and submit the information
6 required by this Act for the political committee, any report or
7 any records of such committee shall be considered in compliance
8 with this Act . . ." Because there was no way the Committee
9 could have known AFT-COPE had split the contribution, the report
10 of the Committee is in compliance with the Act.

11 D. The Committee Group Did Not Knowingly Accept Contributions
12 In Excess of Statutory Limits From the Amalgamated Clothing
13 and Textile Workers Union Political Action Committee (the
14 "ACTWU-PAC").

15 The Complaint alleges that the Committee Group
16 violated 2 U.S.C. § 441a(f) by accepting \$6,000 for the primary
17 election from ACTWU-PAC. (See Complaint, p. 9.) 2 U.S.C.
18 § 441a(f) states that no candidate or political committee shall
19 knowingly accept any contribution from a muticandidate political
20 committee with respect to any election in excess of \$5,000.

21 ACTWU-PAC made the initial \$5,000 contribution on
22 May 17, 1982, designated for the primary election. This
23 contribution was received by the Committee on May 27, 1982, and
24 properly reported. (See Exhibit K.)

25 ACTWU-PAC made a second contribution on October 18,
26 1982: \$1,000 for the general election. Due to a clerical
27 error, this contribution was originally reported by ACTWU-PAC as
28 being made for the primary election. ACTWU-PAC has since

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1 amended its report to show the contribution as made for the
2 general election. (See Exhibit L.)

3 The Committee properly reported the \$1,000 contribu-
4 tion as received for the general election. 11 C.F.R.
5 § 110.2(a)(1) states that the term "with respect to any elec-
6 tion" has the same meaning for muticandidate committees as
7 11 C.F.R. § 110.1(a)(2). 11 C.F.R. § 110.1(a)(2)(ii)(B) states
8 that contributions not designated in writing for a particular
9 election shall be considered for the general election if made
10 after the date of the primary election. The \$1,000 contribution
11 of October 18, 1982, was not designated in writing as for a
12 particular election (see Exhibit M, attached hereto, and
13 Exhibit 2A of the reply of ACTWU-PAC), was made after the
14 primary election, and so was properly accepted and reported by
15 the Committee as received for the general election. (See
16 Exhibit N). The Committee Group therefore received only \$5,000
17 for the primary election from ACTWU-PAC and did not violate 2
18 U.S.C. § 441a(f).

19 E. The Committee Treasurer Properly Designated the \$1,000
20 Contribution Made by ACTWU-PAC on October 18, 1982, as
21 Received for the General Election.

22 The Complaint alleges that the Committee Treasurer
23 violated 11 C.F.R. § 104.14(d) by reporting a contribution of
24 \$1,000 made by ACTWU-PAC on May 27, 1982, as received for the
25 general election, when the ACTWU-PAC's report to the Commission
26 designated it as for the primary election. (See Complaint,
27 p.10.) As shown above in Section III D, the Committee Treasurer
28 correctly reported the contribution as received for the general

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1 election. 11 C.F.R. § 104.14(d) states that each treasurer of a
2 political committee, and any other person required to file any
3 report or statement under the Act shall be personally respon-
4 sible for the accuracy of any information or statement contained
5 in it. The ACTWU-PAC is therefore responsible for its reporting
6 errors, not the Committee Treasurer.

7 F. The Committee Group Did Not Knowingly Receive Contributions
8 From the International Ladies' Garment Workers' Union
9 Campaign Committee (the "ILGWUCC") in Excess of the
10 Statutory Limits.

11 The Complaint alleges that the Committee Group
12 violated 2 U.S.C. § 441a(f) by accepting contributions from the
13 ILGWUCC totalling \$6,000 for the general election. (See Com-
14 plaint, p.11.) 2 U.S.C. § 441a(f) states that no candidate or
15 political committee shall knowingly accept any contribution from
16 a multicandidate political committee with respect to any elec-
17 tion in excess of \$5,000.

18 The Committee received a contribution of \$4,000,
19 designated for the general election, from the ILGWUCC on Septem-
20 ber 29, 1982. This contribution was properly recorded as a con-
21 tribution from the International Ladies' Garment Workers' Union.
22 (See Exhibit O.)

23 The Committee received two additional contributions
24 of \$1,000 each from the ILGWUCC on October 8, 1982. These con-
25 tributions were also designated for the general election. Due
26 to a clerical error, these contributions were reported as being
27 received from the ILGWU. (See Exhibit P.) The fact that the
28 previous contribution had been recorded as received from the

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1 International Ladies' Garment Workers' Union, rather than the
2 abbreviated ILGWU, facilitated the clerical error that misled
3 the Committee Group into believing that the \$4,000 contribution
4 and the two \$1,000 contributions were received from two separate
5 organizations and, therefore, were within the \$5,000 contribu-
6 tion limit.

7 When the Committee Group received the Complaint, they
8 immediately investigated the matter and determined that an error
9 had indeed been made. The Committee thereupon refunded the
10 excess contribution of \$1,000. (See Exhibit Q.) The refund
11 will appear on the statement filed with the Commission for this
12 period.

13 As discussed above, 2 U.S.C. § 432(h)(2)(i) states
14 that when the treasurer of a political committee shows that best
15 efforts have been used to obtain, maintain, and submit the
16 information required by this Act for the political committee,
17 any report or records of such committee shall be considered in
18 compliance with this Act. The actions of the Committee,
19 detailed below, evidence such "best efforts," and, therefore,
20 the receipt of the excess contribution of \$1,000 should not
21 be found to constitute a violation of 2 U.S.C. § 441a(f).

22 The Committee has received more than 25,000 checks
23 representing total contributions of approximately \$5.5 million,
24 and in the regular course of its business voluntarily and
25 promptly refunded hundreds of checks totalling approximately
26 \$100,000 in questionable contributions. The total amount of the
27 contributions in question in this Complaint is only \$8,425. The
28 amount of the excess ILGWUCC contribution is only \$1,000. The

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1 magnitude of the total contributions in comparison to the small
2 amount of disputed contributions is itself evidence of the
3 efforts expended by the Committee to comply with the Act.

4 Mr. Pines became Treasurer of the Committee on
5 August 1, 1981. Shortly thereafter, a memorandum was prepared
6 to establish Committee procedures to ensure compliance with
7 federal and state laws. (See Exhibit B). These procedures are
8 further evidence of the best efforts expended by the Committee.

9 In order to further ensure compliance with the Act,
10 the Committee retained the services of an outside accountant and
11 auditor, Jules Glazer, who is an expert on state and federal
12 campaign reporting laws, and a full-time internal bookkeeper,
13 Toni Kendall, who is familiar with the Act's restrictions on
14 campaign contributions. Furthermore, Mr. Pines himself, in his
15 tenure as City Attorney of Los Angeles, became quite familiar
16 with the campaign reporting and contribution laws. (See
17 Affidavit of Burt Pines, attached hereto as Exhibit R; unsigned;
18 signed affidavit will be submitted under separate cover.) The
19 retention of these experts is still further evidence of the good
20 faith and best efforts used by the Committee to ensure com-
21 pliance with the Act.

22 Because the excess contribution was accepted due to a
23 bookkeeping error, because the contribution has been refunded,
24 and because the Committee Group has at all times demonstrated
25 its good faith and best efforts to comply with the Act, the Com-
26 mittee did not violate 2 U.S.C. § 441a(f).

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IV.

EDMUND G. BROWN, JR. AND THE COMMITTEE ARE NOT
LIABLE FOR ANY ALLEGED VIOLATION OF 11 C.F.R. § 104.14(d).

The Complaint alleges that Edmund G. Brown, Jr. and the Committee violated 11 C.F.R. § 104.14(d) by: 1) failing to designate the \$1,000 contribution made by PACE on April 5, 1982, as received for the primary election; 2) misrepresenting the \$4,425 contribution made by AFT-COPE on May 26, 1982, as received for the general election; and 3) misrepresenting the \$1,000 contribution made by ACTWU-PAC on October 8, 1982, as received for the general election.

Each of these allegations has been refuted above. In addition to the arguments set forth in Sections III B, C, and E, Edmund G. Brown, Jr. and the Committee cannot be held liable as a matter of law under 11 C.F.R. § 104.14(d). 11 C.F.R. § 104.14(d) states that

"Each treasurer of a political committee, and any other person required to file any report or statement under these regulations and under the Act, shall be personally responsible for the timely and complete filing of the report or statement and for the accuracy of any information or statement contained in it." 11 C.F.R. § 104.14(d) (emphasis added).

This rule was promulgated in conjunction with amended 2 U.S.C. § 434(a) which removed the requirement that a candidate file a report of receipts and expenditures. Because the treasurer of a political committee is the only person required to report under 11 C.F.R. Part 104 (11 C.F.R. § 104.1(a)), Edmund G. Brown, Jr.

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1 and the Committee are not responsible for the information con-
2 tained in the reports. Therefore, even if the reports were
3 inaccurate, which they are not, the treasurer would be respon-
4 sible for the inaccuracies, not Edmund G. Brown, Jr. or the Com-
5 mittee itself. For this reason, these allegations must be dis-
6 missed with respect to Edmund G. Brown, Jr. and the Committee.

7 V.

8 CONCLUSION.

9 The Committee Group has continually demonstrated its
10 best efforts to comply with all provisions of the Act. The Com-
11 plaint alleges six violations of the Act by the Committee Group.
12 These allegations were each completely meritless: the Committee
13 Group had no way of knowing that AFT-COPE and PACE might be
14 affiliatated, if in fact, they are; the Committee Treasurer cor-
15 rectly designated the \$1,000 contribution from PACE as for the
16 primary election; the Committee Treasurer properly designated
17 the \$4,425 contribution from AFT-COPE as for the general elec-
18 tion; the two complaints regarding the \$1,000 contribution from
19 ACTWU-PAC were due to clerical errors by the PACs, not by the
20 Committee Group, and were subsequently corrected; and the \$1,000
21 excess contribution from ILGWUCC has been refunded.

22 There is no factual dispute with respect to five of
23 the six issues here: the Committee Group received clearance
24 from both the FEC and the unions involved and therefore
25 exhibited prima facie good faith with respect to the PACE and
26 AFT-COPE contributions; the Committee's records clearly show
27 correct designation of the \$1,000 contribution from PACE; the
28 Committee's records correctly designate the contribution from

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1 AFT-COPE of \$4,425 as received for the general election; and the
2 Committee records are correct with respect to the two complaints
3 regarding the \$1,000 contribution from ACTWU-PAC.

4 The only conceivable factual dispute would arise with
5 respect to the ILGWUCC contribution, where the Committee clearly
6 made clerical errors.

7 In light of the actual factual issues involved, the
8 Committee Group respectfully requests that the Commission find
9 that there is no reason to believe a violation occurred.

10 The purpose of the Act is to ensure the independence
11 of our political system from large contributors. The Act was
12 never intended, however, to be used to punish innocent clerical
13 errors. It should not be used to do so in the present matter.
14 The Committee Group, therefore, respectfully requests that the
15 Commission find no reason to believe that a violation of
16 2 U.S.C. § 441a(f) or 11 C.F.R. § 104.14(d) has occurred and
17 take no further action in this matter.

18 Respectfully submitted,

19 REAVIS & McGRATH
20 A Partnership Including
21 Professional Corporations

22 By: 
23 Roger D. Zornis, Jr.

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Index to Exhibits

- Exhibit A: Complaint filed with the Federal Election Commission on May 31, 1984, by James Edward Antosh (MUR 1716).
- Exhibit B: Procedures for Brown For U.S. Senate Deposits.
- Exhibit C: Registration Statements filed by the Political Action Council of Educators ("PACE").
- Exhibit D: Affidavit of Carmen Robledo.
- Exhibit E: Report of contributions received by the Brown for U.S. Senate Committee (the "Committee") from the American Federation of Teachers Committee On Political Education ("AFT-COPE") and PACE.
- Exhibit F: Designation by the Committee of \$1,000 contribution from PACE, dated April 15, 1982, as received for primary election.
- Exhibit G: Copy of \$5,000 check dated May 26, 1982, from AFT-COPE to the Committee.
- Exhibit H: AFT-COPE report of \$5,000 contribution dated May 26, 1982.
- Exhibit I: Committee report of receipt of \$5,000 contribution from AFT-COPE on June 5, 1982.
- Exhibit J: AFT-COPE and Committee reports of \$4,425 contribution dated August 12, 1982.
- Exhibit K: Committee report of receipt of \$5,000 contribution on May 27, 1982, from Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC").
- Exhibit L: Amended report of ACTWU-PAC designating \$1,000 contribution of October 18, 1982, as intended for the general election.
- Exhibit M: Copy of \$1,000 check dated October 18, 1982 from ACTWU-PAC.

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- Exhibit N: Committee report of receipt of \$1,000 contribution on November 4, 1982, from ACTWU-PAC.
- Exhibit O: Committee report of receipt of \$4,000 on September 28, 1982, from the International Ladies' Garment Workers' Union Campaign Committee ("ILGWUCC").
- Exhibit P: Committee report of receipt of two \$1,000 contributions on October 8, 1982, from the ILGWUCC.
- Exhibit Q: Copy of refund check for \$1,000 from the Committee to the ILGWUCC.
- Exhibit R: Affidavit of Burt Pines.

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PROCEDURES FOR BROWN FOR U.S. SENATE DEPOSITS.

35

1. LOOK AT THE CHECKS FOR ANY OBVIOUS CORPORATE CHECKS: CORP., OR A PROFESSIONAL CORPORATION, AND CASHIER CHECKS.
2. ANY CHECKS THAT ARE BUSINESS CHECKS; CALL THE SECRETARY OF STATE'S OFFICE AND CHECK ON CORPORATE LISTING. RECORD THE DATE, THE LAST NAME OF THE PERSON YOU SPOKE WITH AND YOUR INITIALS ON THE BLUE BANK DEPOSIT CARD. NEXT, CALL THE OWNER OF THE BUSINESS AND ASK IF THE CO. IS INCORPORATED. NOTE THE LAST NAME OF THE PERSON YOU SPOKE WITH ON THE BLUE CARD. AT THIS TIME FIND OUT WHO THE INDIVIDUAL IN THE CO. IS, WHO IS RESPONSIBLE FOR THE CONTRIBUTION, AND NOTE THE TRANSMITTAL ON THE BLUE CARD. (THIS IS THE PERSON TO WHOM THE CONTRIBUTION IS BEING CREDITED TO.)

IF THE CO. IS A PARTNERSHIP SEND THE APPROPRIATE FOLLOW UP DOCUMENTATION TO THE CO. NOTE ON THE BLUE CARD THE DAY WHEN IT WAS MAILED.

WHEN ALL OF THE ABOVE INFORMATION IS COMPLETE, NOTE S.S./ON.C. IN THE LEFT HAND CORNER OF THE CHECK. (SECTY. STATE/OWNER, NOT CORP.)

3. OTHER CHECKS: MAKE SURE THAT THE SIGNATURE ON THE CARD IS THE NAME TO WHICH THE CONTRIBUTION IS ACCREDITED.
4. CALL FEC ON ALL PAC CHECKS, AND RECORD THE FEC ID NUMBER ON THE BLUE CARD AND ON THE CHECK.
5. CROSS REFERENCE CHECKS OVER \$750.00 WITH THE BLUE CARDS, PULL THE FIRST PERIOD BLUE CARD AND NOTE THE AGGEGATE AMOUNT. CROSS REFERENCE UNDER \$750.00 WITH THE "OVER 1,000.00 CONTRIBUTER LIST."
6. AT THIS TIME SEND THE NECESSARY DOCUMENTATION TO THE CONTRIBUTER, IE: PARTNERSHIP LETTERS, MORE INFO. NEEDED LETTERS., ETC.
7. RETURN THE CHECKS TO TONI FOR FINAL CHECK.
8. XEROX TWO COPIES OF THE CHECKS, AND BANK DEPOSIT SLIPS. SEND ONE COPY TO BURT PINES FOR FINAL APPROVAL BEFORE CHECKS ARE DEPOSITED.

Exhibit B

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UNITED STATES SENATE

Office of the Secretary of the Senate
Washington, D.C. 20510

36

**REGISTRATION FORM AND STATEMENT OF ORGANIZATION
FOR POLITICAL COMMITTEES**

**SUPPORTING CANDIDATES FOR U.S. SENATE AND ANTICIPATING CONTRIBUTIONS
OR EXPENDITURES IN EXCESS OF \$1,000 IN ANY CALENDAR YEAR**

SEE REVERSE SIDE FOR ADDITIONAL INSTRUCTIONS
ALL QUESTIONS MUST BE ANSWERED FOR NEW REGISTRATIONS

1. Full name of committee: Political Action Council of Educators
Address: 234 Loma Drive, Los Angeles, CA 90026

Telephone number: 213-483-8611

New Registration Registration Amendment

Identification Number Assigned by Secretary
S 1930

2. Affiliated or connected organizations:

Name of affiliated or connected organization	Mailing address and ZIP code	Relationship
United Teachers-Los Angeles	234 Loma Drive Los Angeles, CA 90026	Membership generally similiar

3. Area, Scope and Jurisdiction of the Committee:

- (a) Will this committee operate in more than one State? No
- (b) Will it operate on a statewide basis in one State? No
- (c) Will it primarily support candidates seeking State or local office? Yes
- (d) Will it support a candidate for the U.S. Senate in an aggregate amount in excess of \$1,000 during the calendar year? No

4. (a) If the committee is supporting individual candidates for the U.S. Senate, list each candidate by name, address, office sought, and party affiliation:

Full names of candidates	Mailing address and ZIP code	State	Party
Alan Cranston	6420 Wilshire Blvd., Los Angeles, CA 90048	Calif.	D

(b) List by name, address, office sought, and party affiliation, any candidate for other Federal office, or for any other office, that this committee is supporting:

Full names of candidates	Mailing address and ZIP code	Office sought	Party
Arline Matthews	7118 Topanga Canyn. Blvd. C.P., 91303	20 CD	D
Robert White	12316 E. Firestone Blvd. Norwalk, 90650	33 CD	D
Edward Roybal	300 N. L. A. St. Rm7110 L. A. 90012	25 CD	D
Henry Waxman	6022 W. Pico Blvd., No. 7, L. A 90035	24 CD	D

*Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate box above when information is continued on separate page(s).
Revised February 1974

Exhibit C

Full Names of Candidates	Mailing Address and Zip Code	Office Sought	Party
37 Tom Rees	816 S. Robertson Blvd., Los Angeles, CA 90035	23 CD	D
Alphonzo Bell	11000 Wilshire Blvd., Los Angeles, CA 90024	27 CD	R
Yvonne Burke	4041 Marlton Avenue Los Angeles, CA 90008	28 CD	D
Augustus Hawkins	300 N. Los Angeles Street Rm 3257 Los Angeles, CA 90012	29 CD	D
James Corman	14545 Frair Van Nuys, CA 91411	21 CD	D

6. Identify by name, address and position, the committee's custodian of books and accounts: 38

Full name	Mailing address and ZIP code	Committee title or position
Betty Karnette	2805 Chestnut Avenue Long Beach, CA 90806	Treasurer Office telephone No. 483-8611

7. List by name, address and position, other principal officers of the committee, including the chairman and treasurer if not identified in Question 6 above and members of the finance committee, if any:

Full name	Mailing address and ZIP code	Committee title or position
Hugh Gottfried	3720 Cardiff Ave. Apt. 5 Los Angeles, CA 90035	Chairman

8. Does this committee plan to stay in existence beyond the current calendar year? YES If so, how long? unknown

9. In the event of dissolution, what disposition will be made of residual funds? to be determined by Committee at Time of dissolution

10. List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of bank, repository, etc.	Mailing address and ZIP code
Security Pacific National Bank	1221 West Fifth Street Los Angeles, CA 90017

11. List all reports (other than reports required by this Act) required to be filed by this committee with States and local jurisdictions, and the names, addresses, and positions of the recipients of the reports:

Report title	Dates required to be filed	Name and position of recipient	Mailing address and ZIP code
Committees Campaign Statement Form Form	10-29-74	Secretary of State, Calif.	Box 1467 Sac. CA 95807
" 703	10-29-74	San Francisco Registrar V	155 City Hal. S. F. CA94
"	10-29-74	L. A. Registrar Voters	808 N. Spring L. A. CA90

*Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate box above when information is continued on separate page(s).

VERIFICATION BY OATH OR AFFIRMATION OF TREASURER

State of California
County of Los Angeles ss.

I, Betty Karnette, being duly sworn, depose (affirm) and say that the information in this Registration Form and Statement of Organization is complete, true, and correct.

Betty Karnette
(Signature of Treasurer of Political Committee)

Subscribed and sworn to (affirmed) before me this 6th day of November, A.D. 1974



Laverta R. Fitzgerald
(Notary Public)

My commission expires March 2, 1975

[SEAL]

RETURN COMPLETED REPORT AND ATTACHMENTS TO:
Hon. Francis R. Valeo, Secretary of the Senate, U.S. Capitol, Washington, D.C. 20510

UNITED STATES HOUSE OF REPRESENTATIVES

Office of the Clerk
Washington, D.C.

39

REGISTRATION FORM AND STATEMENT OF ORGANIZATION

FOR A
POLITICAL COMMITTEE

New Registration
 Registration Amendment
I.D. # _____

SEE REVERSE SIDE FOR ADDITIONAL INSTRUCTIONS
ALL QUESTIONS MUST BE ANSWERED FOR NEW REGISTRATIONS

1. Full name of committee: Political Action Council of Educators
Mailing address and ZIP code: 234 Loma Drive, Los Angeles, CA 90026
Telephone number: 213-483-8611

2. Affiliated or connected organizations:

Name of affiliated or connected organization	Mailing address and ZIP code	Relationship
United Teachers-Los Angeles	234 Loma Drive, L. A. CA 90026	Membership generally similiar

3. Area, scope and jurisdiction of the committee:

- (a) Will this committee operate in more than one State? no
- (b) Will it operate on a statewide basis in one State? no
- (c) Will it primarily support candidates seeking State or local office? yes
- (d) Will it support a candidate for the U.S. House of Representatives in an aggregate amount in excess of \$1,000 during the calendar year? yes

4. (a) If the committee is supporting individual candidates for the U.S. House of Representatives, list each candidate by name, address, office sought, and party affiliation:

Full names of candidates	Mailing address and ZIP code	State and Congressional District	Party
Arline Mathews	7118 Topanga Canyon Blvd., Canoga Park, CA 91303	20 CD	D
Robert White	12316 E. Firestone Blvd., Norwalk, Calif. 90650	33 CD	

(b) List by name, address, office sought, and party affiliation, any candidate for other Federal or public office that this committee is supporting:

Full names of candidates	Mailing address and ZIP code	Office sought	Party
Alan Cranston	6420 Wilshire Blvd., Los Angeles, CA 9004-	Senator Calif.	D

5. If this committee is supporting the entire ticket of a party, give name of party: _____

*Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate box above when information is continued on separate page(s).
Revised January 1974

Full Names of Candidates Mailing Address and Zip Code Office Sought Party

Edward Roybal	300 N. Los Angeles Rm 7110 Los Angeles, CA 90012	25 CD	D
Henry Waxman	6022 W. Pico Blvd., No. 7 Los Angeles, CA 90035	24 CD	D
Tom Rees	816 S. Robertson Blvd. Los Angeles, CA 90035	23 CD	D
Yvonne Burke	4041 Marlton Avenue Los Angeles, CA 90008	28 CD	D
Alphonzo Bell	11000 Wilshire Blvd., Los Angeles, CA 90024	27 CD	R
Augustus Hawkins	300 N. Los Angeles St. Rm 3257 Los Angeles, CA 90012	29 CD	D
James Corman	14545 Frair Van Nuys, CA 91411	21 CD	D

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6. Identify by name, address and position, the committee's custodian of books and accounts:

Full name	Mailing address and ZIP code	Committee title or position
Betty Karnette	2805 Chestnut Avenue Long Beach, CA 90806	Treasurer Office telephone No. 483-8611

7. List by name, address and position of other principal officers of the committee, including the chairman and treasurer if not identified in Question 6 above and members of the finance committee, if any:

Full name	Mailing address and ZIP code	Committee title or position
Hugh Gottfried	3720 Cardiff Ave. Apt. 5 Los Angeles, CA 90034	Chairman

8. Does this committee plan to stay in existence beyond the current calendar year? If so how long? unknown

9. In the event of dissolution, what disposition will be made of residual funds?
to be determined by committee at time of dissolution

10. List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

Name of bank, repository, etc.	Mailing address and ZIP code
Security Pacific National Bank	1221 West 5th Street Los Angeles, CA 90017

11. List all reports required to be filed by this committee with States and local jurisdictions, other than reports required under this Act, the names, addresses, and positions of the recipients of the reports:

Report title	Dates required to be filed	Name and position of recipient	Mailing address and ZIP code
Committees Campaign Statement Form 703	Oct. 29	1) Sec. of State Calif.	Box 1467, Sac. CA 95807
		2) San Franc. Regis. Voters	155 City Hall. S. F. CA 94101
		3) Los Angeles Regis. Voters	808 N. Spring L. A. CA 90017

*Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate box above when information is continued on separate page(s).

VERIFICATION BY OATH OR AFFIRMATION OF TREASURER

State of California
County of Los Angeles ss.

I, Betty Karnette, being duly sworn, depose (affirm) and say that the information in this Registration Form and Statement of Organization is complete, true, and correct.

Betty Karnette
(Signature of Treasurer of Political Committee)

Subscribed and sworn to (affirmed) before me this 6th day of November, A.D. 19 74



(Notary Public)
My commission expires March 2, 1975

AFFIDAVIT OF CARMEN ROBLEDO

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STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I, CARMEN ROBLEDO, declare and say:

1. This affidavit is submitted in response to MUR 1716, filed with the Federal Election Commission on May 31, 1984, by James Edward Antosh.

2. I have worked for the Brown For U.S. Senate Committee since May of 1982. I have held several positions, including bookkeeper.

3. One of my duties as bookkeeper is to supervise tabulation of expenses and receipts of the Brown For U.S. Senate Committee. To the best of my knowledge, the Brown For U.S. Senate Committee has never had a cash flow problem.

4. One of my duties as bookkeeper for the Brown For U.S. Senate Committee is to investigate complaints and ascertain their validity.

5. Upon receiving a copy of MUR 1716, I began an investigation into the alleged affiliation of the American Federation of Teachers Committee On Political Education ("AFT-COPE") and the Political Action Council of Educators ("PACE").

6. On Monday, July 16, 1984, I telephoned the Federal Election Commission in Washington, D.C. and spoke with the Department of Public Records.

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Exhibit D

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7. I was informed by the Department of Public Records that AFT-COPE and PACE were not affiliated.

8. On Wednesday, July 18, 1984, I telephoned the office of PACE. I spoke with the former treasurer, Ms. Dorothy Moser, and the current president, Ms. Judy Solkovits.

9. Both Ms. Moser and Ms. Solkovits informed me that AFT-COPE and PACE are not affiliated.

10. I have at all times utilized my best efforts to determine whether AFT-COPE and PACE are affiliated.

11. Based upon representations made to me by the Federal Election Commission and by officers of PACE, I have determined that, to the best of my knowledge, AFT-COPE and PACE are not affiliated.

I declare, under penalty of perjury, that the foregoing is true and accurate.

Dated this 23 day of July, 1984, at Los Angeles, California.

Carmen Robledo
Carmen Robledo

86040503486

SCHEDULE A

ITEMIZED RECEIPTS

(44)

LINE NUMBER III
(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)
BROWN FOR U.S. SENATE

A. Full Name, Mailing Address and ZIP Code AMERICAN FEDERATION OF STATE COUNTY & MUNICIPAL EMPLOYEES 1625 L STREET WASHINGTON D.C. 20036	Name of Employer PAC # C00027623	Date (month, day, year) 6/14/82	Amount of Each Receipt this Period 2,500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
B. Full Name, Mailing Address and ZIP Code <i>843-8226</i> AMERICAN FEDERATION OF TEACHERS 2412 W. MAGNOLIA BLVD. BURBANK, CALIFORNIA 91506	Name of Employer PAC # C00028860	Date (month, day, year) 6/5/82	Amount of Each Receipt This Period 5,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
C. Full Name, Mailing Address and ZIP Code AMALGAMATED CLOTHING, TEXTILE 15 UNION SQUARE NEW YORK CITY, N.Y. 10003	Name of Employer PAC # C00005728	Date (month, day, year) 5/27/82	Amount of Each Receipt This Period 5,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
D. Full Name, Mailing Address and ZIP Code ARMENIAN NATIONAL COMMITTEE 1501 VENICE BLVD. LOS ANGELES, CALIF. 90006	Name of Employer PAC # C00146969	Date (month, day, year) 6/14/82	Amount of Each Receipt This Period 4,000.00 4,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
E. Full Name, Mailing Address and ZIP Code BANK AMERICA FEDERAL ELECTION 1800 K STREET N.W. WASHINGTON D.C. 20006	Name of Employer PAC # C000147702	Date (month, day, year) 6/5/82	Amount of Each Receipt This Period 1000.00
Receipt For: <input checked="" 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 LEGISLATIVE EDUCATION ACTION BOILERMAKERS BLACKSMITHS 400 FIRST STREET N.W. WASHINGTON, D.C. 20001	Name of Employer PAC # C00005157	Date (month, day, year) 6/5/82	Amount of Each Receipt This Period 1,500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
G. Full Name, Mailing Address and ZIP Code BRICKLAYERS AND ALLIED CRAFTS 815 FIFTEENTH ST N.W. WASHINGTON D.C. 20005	Name of Employer PAC # C00003632	Date (month, day, year) 5/27/82	Amount of Each Receipt This Period 1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
SUBTOTAL of Receipts This Page (optional)			24,000
TOTAL This Period (last page this line number only)			75,615-

Exhibit E

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202-879-4400

AMERICAN FEDERATION OF TEACHERS
COMMITTEE OF POLITICAL EDUCATION

I.O.# 23-7267967-917

May 26 19 82 3/4 11

PAY TO THE
ORDER OF

Brown For U.S. Senate

\$ 5000.00

FIVE THOUSAND DOLLARS

UNDEPOSITED

Hubella H. H. H. J.
Robert H. H.

FOR #000917# 1:054000041: 3 526 771#

Handwritten signature

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POLITICAL ACTION COUNCIL OF EDUCATORS
(P.A.C.E.)

4A-17

234

April 5, 1982

16.356
1223

PAY TO THE
ORDER OF

Brown for U. S. Senate

\$ 1,000.00

One Thousand ----- DOLLARS

SECURITY PACIFIC NATIONAL BANK 
Fifth & Bixel Branch
1221 West 5th St, Los Angeles, Calif. 90017

000023754

Judy Belmont
Melvin Zorn

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SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 10 for
 LINE NUMBER 712
 (Use separate schedule(s) for each
 category of the Detail: 2
 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)
BROWN FOR U.S. SENATE

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
ADA PAC 1411 K STREET N.W. WASHINGTON, D.C. 20005	PAC # C00112680	9/25/82	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 1,000.00	
ABC ACTIVE BALLOT CLUB UNITED FOOD & COMMERCIAL WORKERS 1775 K ST. N.W. WASHINGTON D.C.	PAC # C00002766	7/14/82	4,950.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 4,950.00	
AFL-CIO COPE 815 16th ST N.W., WASHINGTON D.C. 20006	PAC # C00003806	9/28/82	4,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 4,000.00	
AMERICAN FEDERATION OF TEACHERS	PAC # C00028860	8/18/82	4,425.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 4,425.00	
ATTORNEYS CONGRESSIONAL CAMPAIGN TRUST OF ASSOC OF TRIAL LAWYERS 1050 31st ST. N.W. WASHINGTON, D.C. 20007	PAC # C00024521	7/23/82	2,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 2,000.00	
CARPENTERS LEGISLATIVE IMPROVEMENT 101 CONSTITUTION AVENUE WASHINGTON D.C. 20001	PAC # C00001016	8/3/82	5,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 5,000.00	
A.F. OF M. TEMPO P.C.C. 1500 BROADWAY NEW YORK, N.Y. 10036	PAC # C00073627	8/9/82	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 1,000.00	

SUBTOTAL of Receipts This Page (optional)..... **22,375.**

TOTAL This Period (last page this line number only) **111,940.**

8 3 0 4 0 5 0 3 4 9

49

AMERICAN FEDERATION OF TEACHERS
COMMITTEE OF POLITICAL EDUCATION

965

①

August 12 1982 ¹⁵⁴/₁₀ 11

PAY TO THE ORDER OF Brown for U. S. Senate Committee

\$ 4,425.00

4425 DOLLARS

DOLLARS

UNIONIST
Union First National Bank of Washington

Rachelle Smith

Sharon Ni

FOR

#000965# :0540#0004: 3 526 771#

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)
BROWN FOR U.S. SENATE

<input checked="" type="checkbox"/> Full Name, Mailing Address and ZIP Code California Chiropractic PAC 1225 8th Street Suite 550 Sacramento, CA 95814	Name of Employer PAC ID # C00115063	Date (month, day, year) 10-21-81	Amount of Each Receipt this Period \$1,550.00
	Occupation 	12-8-81	\$70.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 1,620.00		

<input checked="" type="checkbox"/> Full Name, Mailing Address and ZIP Code Communication Workers of America COPE-FCC 1925 K Street NW Washington, D.C. 20006	Name of Employer PAC # C00002089	Date (month, day, year) 8-25-81	Amount of Each Receipt This Period \$5,000.00
	Occupation 		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 5,000.00		

<input checked="" type="checkbox"/> Full Name, Mailing Address and ZIP Code Laborers' Political League 905 16th Street N.W. Washington, D.C. 20006	Name of Employer PAC # C00007922	Date (month, day, year) 5-30-81	Amount of Each Receipt This Period \$1,000.00
	Occupation 		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 1,000.00		

<input checked="" type="checkbox"/> Full Name, Mailing Address and ZIP Code Political Action Together IBPAT 1750 NY Ave NW, Washington DC 20006	Name of Employer PAC # C00000885	Date (month, day, year) 7-14-81	Amount of Each Receipt This Period \$ 500.00
	Occupation 		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 500.00		

<input checked="" type="checkbox"/> Full Name, Mailing Address and ZIP Code Political Action Council of Educators 1000 Island Drive Alameda, CA 94501	Name of Employer PAC # C000023754	Date (month, day, year) 7-14-81	Amount of Each Receipt This Period \$1,000.00
	Occupation 		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 1,000.00		

<input checked="" type="checkbox"/> Full Name, Mailing Address and ZIP Code AFL-CIO Committee on Political Educ. 815 16th St. NW Washington, DC 20006	Name of Employer PAC # C00003806	Date (month, day, year) 7-28-81	Amount of Each Receipt This Period \$ 400.00
	Occupation 		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 400.00		

<input checked="" type="checkbox"/> Full Name, Mailing Address and ZIP Code Active Ballot Club, General Fund 855 W. San Bernadino Avenue Bloomington CA 92316	Name of Employer PAC # C00002766	Date (month, day, year) 8-10-81	Amount of Each Receipt This Period \$ 400.00
	Occupation 		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 400.00		

SUBTOTAL of Receipts This Page (optional).....

TOTAL This Period (last page this line number only).....

9770.00

51

POLITICAL ACTION COUNCIL OF EDUCATORS
(P.A.C.E.)

2A-62

218

~~F.F.C. TO COLLECT 2174~~

July 2, 1981

16,356
1223

PAY TO THE
ORDER OF

Brown for Senate

\$ 1,000.00

One thousand and no/100

DOLLARS

SECURITY PACIFIC NATIONAL BANK 
Fifth & Bixel Branch
1221 West 5th St, Los Angeles, Calif. 90017

Donation

Richard Bennett

⑆ 1223 0356 10218 008 042259 ⑈

86040583401

SCHEDULE A

ITEMIZED RECEIPTS

52

Page 2 of 4 for
LINE NUMBER 718
(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)

Brown for U.S. Senate

A. Full Name, Mailing Address and ZIP Code
Political Action Council of Educators
2511 W 3rd Street
Los Angeles, CA 90057

Name of Employer
I.D.# C00023754
Occupation

Date (month, day, year)
4/15/82

Amount of Each Receipt this Period
\$1000.

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$

B. Full Name, Mailing Address and ZIP Code
ROLMPAC
4900 Old Ironsides Dr.
Santa Clara, CA 95050

Name of Employer
I.D.# C00118224
Occupation

Date (month, day, year)
4/15/82

Amount of Each Receipt This Period
\$150.

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$

C. Full Name, Mailing Address and ZIP Code
Roos for Assembly Committee
6255 Sunset Bl. Ste. 2000
Los Angeles, Ca. 90028

Name of Employer
I.D.# C00133686
Occupation

Date (month, day, year)
5/11/82

Amount of Each Receipt This Period
\$1000.

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$

D. Full Name, Mailing Address and ZIP Code
SEIU-COPE Fund PAC
2020 K. Street, N.W.
Washington, D.C. 20006

Name of Employer
I.D.# C00004036
Occupation

Date (month, day, year)
5/1/82

Amount of Each Receipt This Period
\$2000.

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$

E. Full Name, Mailing Address and ZIP Code
UAPAC-United Assoc. of Journeymen & Apprentices of Plumbing & Pipe-Fitting Industry
901 Massachusetts Ave. N.W.
Washington, D.C. 20006

Name of Employer
I.D.#
Occupation

Date (month, day, year)
5/5/82

Amount of Each Receipt This Period
\$1000.

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$

F. Full Name, Mailing Address and ZIP Code
UAW V CAP
800 E. Jefferson
Detroit, Mi. 48214

Name of Employer
I.D.# C00002840
Occupation

Date (month, day, year)
5/17/82

Amount of Each Receipt This Period
\$5000.

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$

G. Full Name, Mailing Address and ZIP Code
United Food & Commercial Workers International Union, ABC
1775 K Street, N.W.
Washington D.C. 20006

Name of Employer
I.D.# C00002766
Occupation

Date (month, day, year)
5/11/82

Amount of Each Receipt This Period
\$4600.

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$

SUBTOTAL of Receipts This Page (optional) Exhibit F 17,750.-

TOTAL This Period (last page this line number only)

53

POLITICAL ACTION COUNCIL OF EDUCATORS
(P.A.C.E.)

4A-17

234

April 5, 1982

16,358
1223

PAY TO THE
ORDER OF

Brown for U. S. Senate

\$ 1,000.00

One Thousand

DOLLARS

SECURITY PACIFIC NATIONAL BANK 
Fifth & Bixel Branch
1221 West 5th St, Los Angeles, Calif. 90017

⑆⑆⑆⑆23754

Judy Belmont
W. Belmont

⑆1: 2223 ⑆⑆⑆⑆0356 ⑆⑆⑆⑆0234 ⑆⑆⑆⑆008 ⑆⑆⑆⑆042259⑆⑆

40583496

54

1. Name of Committee (in Full)
Political Action Council of Educators

Address (Number and Street)
2511 West 3rd Street

City, State and ZIP Code
Los Angeles, CA 90057

Check if address is different than previously reported.

2. FEC Identification Number
C00023754

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

4. TYPE OF REPORT (check appropriate boxes)

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

(b) Is this Report an Amendment?
 YES NO

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>4-1-82</u> Through <u>6-30-82</u>		
6. (a) Cash on Hand January 1, 19 <u>82</u>		\$ 1,448.92
(b) Cash on Hand at Beginning of Reporting Period	\$ 1,668.55	
(c) Total Receipts (from Line 18)	\$ 5,117.33	\$ 5,117.33
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 6,785.88	\$ 6,785.88
7. Total Disbursements (from Line 28)	\$ 6,000.00	\$ 6,000.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 785.88	\$ 785.88
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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

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

William Zimmerman
 Type or Print Name of Treasurer

William Zimmerman
 SIGNATURE OF TREASURER

8/24/82
 Date

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

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

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Name of Committee (in Full)
Political Action Council of Educators

Report Covering the Period:

From To:

55

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

5,117.33

(Memo Entry Unitemized \$)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES

17. OTHER RECEIPTS (Dividends, Interest, etc.)

18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES

22. INDEPENDENT EXPENDITURES (Use Schedule E)

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)

27. OTHER DISBURSEMENTS

28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d

30. TOTAL CONTRIBUTION REFUNDS from Line 26d

31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	5,117.33	\$8,278.08
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)		
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.)		
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)	5,117.33	\$8,278.08
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	150.14	1,346.26
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
22. INDEPENDENT EXPENDITURES (Use Schedule E)	0	\$1,745.00
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)		
24. LOAN REPAYMENTS MADE		
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)		
27. OTHER DISBURSEMENTS		
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	\$5,117.33	\$11,369.34
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d		
30. TOTAL CONTRIBUTION REFUNDS from Line 26d		
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)		
32. TOTAL OPERATING EXPENDITURES from Line 19		
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)		

870405834

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

56

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 Action Council of Educators

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Mel Levine for Congress 404 North Roxbury Drive #600 Beverly Hills, CA 90210	dinner Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5-27-82	1,000.00
Mathew Martinez for Congress 440 E. Garvey Monterey Park, CA 91754	dinner Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5-27-82	1,000.00
Brown for Congress Committee 13701 Riverside Dr. #600 Sherman Oaks, CA 91423	dinner Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	6-25-82	150.00
Lehman for Congress Comm. P. O. Box 829 Fresno, CA 93712	dinner Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	6-17-82	500.00
Esteban Torres for Congress Comm. 11717 La Plaza Norwalk Square Norwalk, CA 90650	dinner Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5-27-82	1,000.00
Hawkins for Congress Committee P. O. Box 6356 Washington, D. C. 20015	dinner Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4-30-82	300.00
Howard Berman for Congress Comm. 360 S. Kenmore #306 Los Angeles, CA 90020	dinner Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5-27-82	1,000.00
Brown for U. S. Senate 1125 West 3rd., Street Los Angeles, CA 90017	dinner Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4-5-82	1,000.00 ✓
Tackett for Congress Comm. P. O. Box 545 Mc Farland, CA 93250	dinner Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4-30-82	50.00
SUBTOTAL of Disbursements This Page (optional)			\$6,000.00
TOTAL This Period (last page this line number only)			

202-879-1400

AMERICAN FEDERATION OF TEACHERS
COMMITTEE OF POLITICAL EDUCATION

I.D.# 23-7267767 917

May 26 19 82 5-6/40 11

PAY TO THE ORDER OF

Drawn For U.S. Senate

\$ 5000.00

FIVE THOUSAND DOLLARS

DOLLARS

UNION

Charlene H. ...
Robert ...

⑈000917⑈ ⑆0540⑈0004⑆ 3 526 77⑈⑈

[Handwritten signature]

Exhibit G

1. Name of Committee (in Full)

American Federation of Teachers
Committee on Political Education

Address (Number and Street)

11 Dupont Circle, N. W.

City, State and ZIP Code

Washington, D. C. 20036

Check if address is different than previously reported.

2. FEC Identification Number
C-000028860

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

TYPE OF REPORT (check appropriate boxes)

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

(b) Is this Report an Amendment?
 YES NO

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>4/1/82</u> Through <u>6/30/82</u>		
6. (a) Cash on Hand January 1, 19 <u>82</u>		\$ 48,567.04
(b) Cash on Hand at Beginning of Reporting Period	\$ 18,777.96	
(c) Total Receipts (from Line 18)	\$ 60,587.18	\$ 66,848.10
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 79,365.14	\$ 115,415.14
7. Total Disbursements (from Line 28)	\$ 68,260.00	\$ 104,310.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 11,105.14	\$ 11,105.14
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4058

Robert G. Porter

Type or Print Name of Treasurer

Robert G. Porter

SIGNATURE OF TREASURER

August 12, 1982

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 4370a.

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

						Exhibit H	FEC FORM 3X D
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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)

American Federation of Teachers, Committee on Political Education

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement \$550 Contrib. Mike Barnes MD. 8th CD US Congress Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 4/20/82 4/21/82	Amount of Each Disbursement This Period 500.00 50.00
B. Full Name, Mailing Address and ZIP Code Beckes For Congress Box 425 Girard, Ohio 44420	Purpose of Disbursement \$300. Contrib. Mike Beckes OH. 17th CD US Congress Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 6/2/82	Amount of Each Disbursement This Period 300.00
C. Full Name, Mailing Address and ZIP Code Brown For U.S. Senate 1125 W. 6th St. - 3rd Floor Los Angeles, CA. 90017	Purpose of Disbursement \$5,000 Contrib. Jerry Brown CA. U.S. Senate Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) Prim. 5/26/82 Gen. 5/26/82	Amount of Each Disbursement This Period 4,425.00 ✓ 575.00
D. Full Name, Mailing Address and ZIP Code Burdick Campaign Committee P.O. Box 2696 Washington, D.C. 20013	Purpose of Disbursement \$500 Contrib. Quentin Burdick N.D. U.S. Senate Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 6/15/82	Amount of Each Disbursement This Period 500.00
E. Full Name, Mailing Address and ZIP Code Phillip Burton For Congress P.O. Box 4200 San Francisco, CA. 94101	Purpose of Disbursement \$2,500 Contrib. Phillip Burton CA 6th CD U.S. Congress Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 5/26/82	Amount of Each Disbursement This Period 2,500.00
F. Full Name, Mailing Address and ZIP Code Friends of Robert Byrd Committee 400 N. Capital St. Suite 325 Washington, D.C. 20001	Purpose of Disbursement \$5,000 Contrib. Robert Byrd W.V. U.S. Senate Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 5/31/82	Amount of Each Disbursement This Period 5,000.00
G. Full Name, Mailing Address and ZIP Code Lawton Chiles Campaign Fund Federal Bldg. Lakeland, FL. 33801	Purpose of Disbursement \$100 Contrib. Lawton Chiles Fl. U.S. Senate Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 6/22/82	Amount of Each Disbursement This Period 100.00
H. Full Name, Mailing Address and ZIP Code Clay Campaign Committee P.O. Box 912 St. Louis, MO. 63188	Purpose of Disbursement \$500 Contrib. William Clay MO. 1st CD U.S. Congress Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 6/22/82	Amount of Each Disbursement This Period 500.00
I. Full Name, Mailing Address and ZIP Code Bill Curry for Congress Committee 116 Main Street New Britain, CT. 06051	Purpose of Disbursement \$1,000 Contrib. Bill Curry CT. 6th CD U.S. Congress Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 6/23/82	Amount of Each Disbursement This Period 1,000.00

SUBTOTAL of Disbursements This Page (optional) 15,450.00

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

(60)

Page 1 of 15 for
LINE NUMBER 112
(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)
BROWN FOR U.S. SENATE

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
AMERICAN FEDERATION OF STATE COUNTY & MUNICIPAL EMPLOYEES 1625 L STREET WASHINGTON D.C. 20036	PAC # C00027623	6/14/82	2,500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date-\$
B. Full Name, Mailing Address and ZIP Code 843-8226 AMERICAN FEDERATION OF TEACHERS 2412 W. MAGNOLIA BLVD. BURBANK, CALIFORNIA 91506	PAC # C00028860	6/5/82	5,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date-\$
C. Full Name, Mailing Address and ZIP Code AMALGAMATED CLOTHING, TEXTILE 15 UNION SQUARE NEW YORK CITY, N.Y. 10003	PAC # C00005728	5/27/82	5,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date-\$
D. Full Name, Mailing Address and ZIP Code ARMENIA NATIONAL COMMITTEE 1501 VENICE BLVD. LOS ANGELES, CALIF. 90006	PAC # C00146969	6/14/82	4,000.00 4,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date-\$
E. Full Name, Mailing Address and ZIP Code BANK AMERICA FEDERAL ELECTION 1800 K STREET N.W. WASHINGTON D.C. 20006	PAC # C000147702	6/5/82	1000.00
Receipt For: <input checked="" 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 LEGISLATIVE EDUCATION ACTION BOILERMAKERS BLACKSMITHS 400 FIRST STREET N.W. WASHINGTON, D.C. 20001	PAC # C00005157	6/5/82	1,500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date-\$
G. Full Name, Mailing Address and ZIP Code BRICKLAYERS AND ALLIED CRAFTS 815 FIFTEENTH ST N.W. WASHINGTON D.C. 20005	PAC # C00003632	5/27/82	1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date-\$
SUBTOTAL of Receipts This Page (optional)			24,000
TOTAL This Period (last page this line number only)			75,615

AFY
etc

Exhibit I

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

61

Sumner
Porter

(Summary Page)

<p>1. Name of Committee (in Full) American Federation of Teachers Committee on Political Education</p> <hr/> <p>Address (Number and Street) 21 Dupont Circle, N.W.</p> <hr/> <p>City, State and ZIP Code Washington, D.C. 20036</p> <p><input type="checkbox"/> Check if address is different than previously reported.</p> <p>2. FEC Identification Number C-000028860</p> <p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)</p>	<p>4. TYPE OF REPORT (check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input checked="" type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only) <input type="checkbox"/> Monthly Report for _____ <input type="checkbox"/> Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____ <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____ <input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>
--	--

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>7/1/82</u> Through <u>9/30/82</u>		
6. (a) Cash on Hand January 1, 19 <u>82</u>		\$ 48,567.04
(b) Cash on Hand at Beginning of Reporting Period	\$ 11,105.14	
(c) Total Receipts (from Line 18)	\$ 237,274.16	\$ 304,122.26
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 248,379.30	\$ 352,689.30
7. Total Disbursements (from Line 28)	\$ 242,719.07	\$ 347,029.07
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 5,660.23	\$ 5,660.23
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-623-4068

Robert G. Porter
Type or Print Name of Treasurer

Robert G. Porter
SIGNATURE OF TREASURER

Exhibit J
October 7, 1982
Date

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

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

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SCHEDULE B

ITEMIZED DISBURSEMENTS

62

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)			
American Federation of Teachers, Committee on Political Education			
A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement \$250. Les Aucoin OR. 1st CD U.S. Congress	Date (month, day, year)	Amount of Each Disbursement This Period
Committee To Re-Elect Les Aucoin 5319 Southwest W. Gate Dr. Suite 222 Portland, Oregon 97228	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/17/82	250.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement \$100 Dick Batchelor Fl. 5th CD U.S. Congr.	Date (month, day, year)	Amount of Each Disbursement This Period
Dick Batchelor For Congress P.O. Box 3151 Orlando, FL. 32802	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/12/82	100.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement \$1,000 Howard Berman CA 26th CD U.S. Cong.	Date (month, day, year)	Amount of Each Disbursement This Period
Berman For Congress Committee 360 S. Kenmore Ave., Suite 306 L.A. CA. 90020	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/12/82	1,000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement \$2,500 Jeff Bingaman NM US Senate	Date (month, day, year)	Amount of Each Disbursement This Period
Jeff Bingaman For U.S. Senate P.O. Box 5775 Sante Fe, N.M. 87502	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/9/82 8/11/82	500.00 2,000.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement \$2,000 Sherwood Boehlert N.Y. 25th CD U.S. Cong.	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Sherwood Boehlert Committee 506 Eleecker St. Utica, N.Y. 13501	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/13/82	2,000.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement \$100 Pat Bosch AZ 3rd CD U.S. Congress	Date (month, day, year)	Amount of Each Disbursement This Period
Pat Bosch For Congress Committee P.O. Box 64 Tolleson, AZ. 85353	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/27/82	100.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement \$1,150 Barbara Boxer CA 6th CD U.S. Congress	Date (month, day, year)	Amount of Each Disbursement This Period
Barbara Boxer Campaign Committee P.O. Box 4881 S.F., CA. 94101	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/08/82 9/08/82	1,000.00 150.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement \$5,000 CA U.S. Senate Jerry Brown	Date (month, day, year)	Amount of Each Disbursement This Period
Brown For U.S. Senate 1125 W. 6th St. - 3rd Floor L.A., CA. 90017	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/12/82	4,425.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement \$2,500 Quentin Burdick ND U.S. Senate	Date (month, day, year)	Amount of Each Disbursement This Period
Burdick Campaign Committee P.O. Box 2696 Wash., D.C. 20013	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/12/82	2,500.00
SUBTOTAL of Disbursements This Page (optional)			14,025.00
TOTAL This Period (last page this line number only)			

35053030403060



86040703507

AMERICAN FEDERATION OF TEACHERS
COMMITTEE OF POLITICAL EDUCATION

965

August 12 19 82 ¹⁵⁻⁴/₅₄₀ 11

①

PAY TO THE
ORDER OF

Brown for U. S. Senate Committee

\$ 4,425.00

4425 DOLLARS

DOLLARS

UNIONIST
Member First National Bank of Washington

Rachelle Brown
Phila Pa

FOR

#000965# .1:0540#0004: 3 526 771#

64

SCHEDULE A

ITEMIZED RECEIPTS

(65)

(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)
BROWN FOR U.S. SENATE

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
AMERICAN FEDERATION OF STATE COUNTY & MUNICIPAL EMPLOYEES 1625 L STREET WASHINGTON D.C. 20036	PAC # C00027623	6/14/82	2,500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
AMERICAN FEDERATION OF TEACHERS 2412 W. MAGNOLIA BLVD. BURBANK, CALIFORNIA 91506	PAC # C00028860	6/5/82	5,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
AMALGAMATED CLOTHING, TEXTILE 15 UNION SQUARE NEW YORK CITY, N.Y. 10003	PAC # C00005728	5/27/82	5,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
ARMENIAN NATIONAL COMMITTEE 1501 VENICE BLVD. LOS ANGELES, CALIF. 90006	PAC # C00146969	6/14/82	4,000.00 4,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
BANK AMERICA FEDERAL ELECTION 1800 K STREET N.W. WASHINGTON D.C. 20006	PAC # C000147702	6/5/82	1000.00
Receipt For: <input checked="" 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
LEGISLATIVE EDUCATION ACTION BOILERMAKERS BLACKSMITHS 400 FIRST STREET N.W. WASHINGTON, D.C. 20001	PAC # C00005157	6/5/82	1,500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
BRICKLAYERS AND ALLIED CRAFTS 815 FIFTEENTH ST N.W. WASHINGTON D.C. 20005	PAC # C00003632	5/27/82	1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	

SUBTOTAL of Receipts This Page (optional) 24,00

TOTAL This Period (last page this line number only) 75,615

Exhibit K

Actual 35040503350

(66)

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5		
CONTRIBUTION		
REC ID = C00005728		
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ACTWU POLITICAL ACTION COMMITTEE
15 UNION SQUARE
NEW YORK, N.Y. 10003

228

7

May 17, 1982

PAY TO THE ORDER OF Brown for Senate Campaign \$5,000.00

Five thousand and 00/100 Dollars

The Amalgamated Bank of New York

5152 11-15 UNION SQUARE NEW YORK, NEW YORK 10003

W. J. ...
W. J. ...

⑆026003379⑆ 01077276⑈

67

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)

Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bob Shamansky for Congress Committee 101 No. High St. P.O. Box 15668 Columbus, Ohio 43215 OHIO	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	300.00
Paul Simon Congress Committee 231 West Maine, Apt. East Carbondale, Ill. 62901 ILL.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	500.00
Aukerman for Congress Committee P.O. Box 172 Providence, R.I. 02901 R.I.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	250.00
Brown for Senate Campaign 1125 West 6th St. Los Angeles, Calif. 90017 CALIF.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	1000.00
James McClure Clarke for Congress P.O. Box 7434 Asheville, No. Car. 28817 NO. CAR.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	300.00
Friends of Bob Carr 2110 East Michigan Lansing, Mich. 48912 MICH.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/22/82	2000.00
Monsma for Congress 829 North Kentview, N.E. Grand Rapids, Mich. 49505 MICH.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/22/82	2000.00
Committee to Re-elect Leo C Zefferetti C/O Joseph F. DeFina P.O. Box 221-Red Hook Station Brooklyn, N.Y. 11231 N.Y.	Tickets Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/22/82	100.00
Offner for Congress 1507 Losey Boulevard, South LaCrosse, Wisc. 54601 WISC.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	50.00

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

35040103510

Exhibit L

68

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Name of Committee (in Full)

Emalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code Keep Kastenmeier in Congress P.O. Box 24236 Washington, D.C. 20024 WISC.	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	200.00

B. Full Name, Mailing Address and ZIP Code Ratie Hall for Congress 637 Broadway Gary, Ind. 46402 IND.	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	1000.00

C. Full Name, Mailing Address and ZIP Code Major Owens for Congress Committee 1125-29 Eastern Parkway Brooklyn, N.Y. 11213 NEW YORK	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	250.00

D. Full Name, Mailing Address and ZIP Code Sam Gejcanson for Congress P.O. Box 1982 Sozrah, Conn. 06334 CONN.	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	50.00

Full Name, Mailing Address and ZIP Code The Committee to Elect Ken Mosley P.O. Drawer 1569 Orangeburg, So. Car. 29115 SO. CAR.	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	250.00

Full Name, Mailing Address and ZIP Code Friends of Bob Carr 2110 East Michigan Lansing, Mich. 48912 MICH.	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	500.00

Full Name, Mailing Address and ZIP Code Robin Britt for Congress P.O. Box 222 122 East Market St. Greensboro, No. Car. 27402 NO. CAR.	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	300.00

Full Name, Mailing Address and ZIP Code Esiason Congressional Campaign Comm. P.O. Box 72 North Granville, N.Y. 12854 NEW YORK	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	250.00

Full Name, Mailing Address and ZIP Code Jim Guest for U.S. Senate P.O. Box 1438- 34 Main Street Montpelier, Vermont 05602 VERMONT	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	500.00

TOTAL of Disbursements This Page (optional)

AL This Period (last page this line number only)

69

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Name of Committee (in Full)

Amalganated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Frank Harrison for Congress Committee 15 South Franklin Street Wilkes Barre, Pa. 18711 PENNA	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	300.00
Terry Mann for Congress 731 Madison Avenue Covington, Kentucky 41011 KY.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	200.00
Don Mills for U.S. Congress Box 1124 Frankfort, Kentucky 40602 KY.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	250.00
Committee to Re-elect Wycle Fowler 207 C Street, S. E. Washington, D. C. 20003 GA.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/28/82	300.00
James J. Florio for Congress Committee P O Box 8028, Southwest Station Washington, D. C. 20024 N.J.	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/22/82	250.00
[Blank]	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
[Blank]	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
[Blank]	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
[Blank]	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

TOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only) 11,100.00

70

82

<p>BY A DEPOSITARY THIS CHECK SHOULD BE DEPOSITED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT</p>		<p>ACTWU POLITICAL ACTION COMMITTEE #6 15 UNION SQUARE NEW YORK, N.Y. 10003</p>	
<p>CONTRIBUTION</p>		<p>October 18, 1982</p>	
<p>TOTAL OF INVOICES</p>		<p>PAY TO THE ORDER OF Brown for Senate Campaign \$1,000.00</p>	
<p>LESS PAYMENTS</p>		<p>One thousand and 00/100</p>	
<p>TOTAL DEDUCTIONS</p>		<p>The Amalgamated Bank of New York 11-15 UNION SQUARE NEW YORK, NEW YORK 10003</p>	
<p>AMOUNT OF CHECK</p>		<p>Wray H. Fur J. Solomon</p>	
<p>AMOUNT OF CHECK</p>		<p>⑆026003379⑆ 01077276⑈</p>	

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Exhibit M

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 11 for
 LINE NUMBER 110
 (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)

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Action Committee for Rural Electrification 1800 Massachusetts Ave. N.W. Washington D.C. 20036		10-22-82	\$1,500.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 1,500.00	
B. Full Name, Mailing Address and ZIP Code ACTWU PAC 15 Union Square New York, NY 10003		11-4-82	\$1,000.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 1,000.00	
C. Full Name, Mailing Address and ZIP Code American Democratic PAC 207 Pennsylvania Ave. S.E. Washington D.C. 20003		10-28-82	\$100.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 100.00	
D. Full Name, Mailing Address and ZIP Code American Federation of Gov't Employees 1325 Massachusetts Ave. N.W. Washington D.C. 20005		10-28-82	\$3,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 5,000.00	
E. Full Name, Mailing Address and ZIP Code American President Lines LTD PAC 1950 Franklin St. Oakland, Ca. 94612		10-22-82	\$500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 500.00	
F. Full Name, Mailing Address and ZIP Code Anheuser Busch PAC One Busch Place St. Louis, MO. 63118		10-25-82	\$2,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 2,000.00	
G. Full Name, Mailing Address and ZIP Code AYLA PAC 515 So. Flower St. Ste. 2500 Los Angeles, Ca. 90071		10-28-82	\$200.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 200.00	
SUBTOTAL of Receipts This Page (optional)			\$8,300.00
TOTAL This Period (last page this line number only)			103,880.

8

11/22/82

Exhibit N

74

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 (Full) **BROWN FOR U.S. SENATE**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
EMPLOYEES FOR GOOD GOVT. 420 MONTGOMERY ST. SAN FRANCISCO, CA		10/13	1,000.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 1,000.	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
FRIENDS FO THE EARTH PAC 1045 SANSOME ST. SAN FRANCISCO, CA		10/13	180.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 180.	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
HUMAN RIGHTS CAMPAIGN FUND PO BOX 1396 WASHINGTON D.C.		10/13	1500.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 1500.	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
IBEW 1125 15th ST. N.W. WASHINGTON, D.C.		10/8	2000.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 2000.	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
ILGWU 1710 BROADWAY NEW YORK, NY		10/8 10/8	1,000. 1,000.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 1,000.	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
JOSEPH SEAGRAMS AND SONS INC. 800 THIRD AVE. NEW YORK, NY		10/12	1,000.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 1,000.	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
LEAGUE OF CONSERVATION VOTERS 317 PENNSYLVANIA AVE S.E. WASHINGTON, D.C.		10/11	1,000.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 1,000.	

SUBTOTAL of Receipts This Page (optional) 8680

TOTAL This Period (last page this line number only) Exhibit P

040:03517

BROWN FOR U.S. SENATE
1125 W. SIXTH ST. 212-877-1313
LOS ANGELES, CA 90017

~~CONFIDENTIAL~~
SAN SANTA MONICA BLVD. - LOS ANGELES, CA 90005

Num **BONDED**

77

CHECK NO. 2026 DATE July 13, 1984 AMOUNT \$1,000.00

PAY

REGIS. NO. 76N12300 I 000 DOLL 00 CTS 7

TO THE ORDER OF

I.L.C.W.U.
CAMPAIGN COMMITTEE
1710 Broadway
New York, N.Y. 10019

NOT NEGOTIABLE

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BROWN FOR U.S. SENATE

DELIVER FROM NWC-S VS

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
July 13, 1984	Refund of Contribution	1,000.00		

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS			TOTAL DEDUCTIONS	NET
	WELLS	DATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHHELD U.S. INC. TAX	S.S.I.		

86040363520

*mailed check
will appear on statement for this period*

Exhibit Q

BCC #4348

78

REAVIS & McGRATH

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SIXTH FLOOR · BROADWAY PLAZA

700 SOUTH FLOWER STREET

LOS ANGELES, CALIFORNIA 90017

TELEPHONE 213 626-8241
TELECOPIER 213 680-4518
CABLE ADDRESS KEARN
TELEX 69-1208

345 PARK AVENUE
NEW YORK, N. Y. 10184

August 16, 1984

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

Re: MUR 1716

00:00:00

Gentlemen:

Enclosed is the executed Affidavit filed as Exhibit R of the Reply to the complaint filed by James Edward Antosh in connection with MUR 1716. Also enclosed are "Statement of Designation of Counsel" forms executed by Burt Pines, Jules Glazer and Jodie Krajewski on behalf of the Brown For U.S. Senate Committee, to be filed with the Commission in accordance with my telephone conversation with Mr. Peter Knych on August 14, 1984.

Please call me if you have any questions.

Very truly yours,

R. D. Loomis, Jr.
Roger D. Loomis, Jr.

RDL/ek

cc: Mr. Peter Knych (w/encl.)

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AFFIDAVIT OF BURT PINES

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STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I, BURT PINES, being duly sworn, depose and state as follows:

1. I am an attorney, admitted to practice in the State of California, and a member of the law firm of Alschuler, Grossman & Pines, 1880 Century Park East, Los Angeles, California 90067.

2. I am submitting this affidavit in opposition to the Complaint numbered MUR 1716, filed with the Federal Election Commission (the "Commission") on May 31, 1984, by James Edward Antosh, which alleges that I and the Brown for U.S. Senate Committee (the "Committee") violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.14(d). Mr. Antosh's complaint is unfounded because I never "knowingly" accepted, or caused to be accepted and retained, any illegal contributions.

3. I served as Los Angeles City Attorney between 1973 and 1981. In that capacity, I was responsible for enforcing local and state election laws and providing election law advice to candidates and elected officials. I also was elected and therefore was personally subject to local and state election laws. While I was City Attorney, I scrupulously endeavored to comply with the applicable election and campaign reporting laws.

//

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1 4. Toward the end of my term as City Attorney,
2 Governor Edmund G. Brown, Jr. asked me to serve as the treasurer
3 of his Senate campaign. As a public service, and because I was
4 committed to his candidacy, I agreed to take the position, com-
5 mencing August 1, 1981.

6 5. My term as City Attorney ended on June 30, 1981.
7 After a month's vacation with my family, I began work with my
8 new law firm on August 1, 1981. On that date I also assumed the
9 treasurer position of the Brown campaign. I served as treasurer
10 until the end of that Senate campaign.

11 6. Throughout the period I was treasurer, I
12 endeavored to make sure that the Committee complied with federal
13 election laws. I know Governor Brown shared the same commit-
14 ment. (No doubt this is one of the reasons why he wanted me as
15 treasurer, given my law enforcement background.) I also believe
16 that Jodie Krajewski and her campaign staff felt the same way,
17 and that they took all reasonable measures to avoid election law
18 violations.

19 7. Shortly after becoming treasurer, I reviewed with
20 the staff the various procedural safeguards they had established
21 to assure compliance with the election laws and I made some
22 revisions of those procedures as needed. Those procedures are
23 summarized in Reavis & McGrath's letter to the Federal Election
24 Commission (MUR 1601) filed with the Commission on March 6,
25 1984.

26 8. As an additional safeguard, I endeavored to review
27 all campaign contributions received by the Committee -- subject
28 to the demand of my private law practice. I was able to review

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1 almost all of the checks. If I saw a contribution which caused
2 me to suspect that the legal limit had been exceeded I would
3 review the contribution with the staff person. If it turned out
4 that the contribution did exceed the legal limit, I would cause
5 a refund to be made.

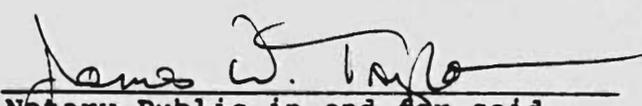
6 9. At my insistence, the Committee retained the
7 services of Jules Glazer, an outside accountant and expert on
8 campaign reporting laws. Among other things, Mr. Glazer's role
9 was to independently audit the campaign, review and install
10 internal bookkeeping procedures, and approve the campaign
11 reports before I signed them.

12 10. I have reviewed the complaint filed in MUR 1716.
13 The allegations contained therein are unfounded. At no time did
14 I knowingly accept contributions in excess of the legal
15 limitations from any of the organizations identified in the
16 complaint or fail to designate any contribution as between a
17 primary and general election in accordance with the applicable
18 statutory requirement and Rules of the Commission.

19 Executed on August 14, 1984, at Los Angeles,
20 California.

21 
22 _____
23 Burt Pines

24
25 Subscribed and sworn to before me
26 this 14 day of August, 1984.

27 
28 _____
Notary Public in and for said
County and State



86040563524

TELEPHONE 213 626-5241
TELECOPIER 213 489-1883
CABLE ADDRESS KEARN
TELEX: 69-1206

REAVIS & McGRATH
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SIXTH FLOOR · BROADWAY PLAZA
700 SOUTH FLOWER STREET
LOS ANGELES, CALIFORNIA 90017

82

RECEIVED BY THE FEC
GCC#4224
84 AUG 1 AIO: 05
345 PARK AVENUE
NEW YORK, N.Y. 10154
1776 F STREET, N.W.
WASHINGTON, D.C. 20006

July 31, 1984

General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Mr. Peter Knych

Re: MUR 1716

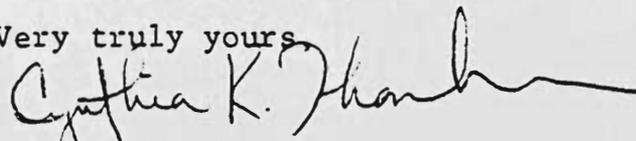
Dear Peter:

Enclosed please find two copies of the Robledo affidavit and the original, which affirms that the notations that we discussed were made after receipt of the Antosh complaint.

If you need any other documents, please call either Roger Loomis or me at this office.

Thank you for your cooperation in this matter.

Very truly yours,



Cynthia K. Thornton

CKT/nb
Enclosures

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Committee Group and the Commission to quickly locate the relevant entries. These notations were also highlighted.

7. I made these notations in response to allegations contained in the Antosh Complaint.

8. Specifically, the notation made in Exhibit O of the Brief, identifying the International Ladies Garment Workers Union as the ILGWU, was made after I received a copy of the Antosh Complaint.

9. Additionally, the notation made in Exhibit P of the Brief, identifying the ILGWU as the International Ladies Garment Workers Union, was made after I received a copy of the Antosh Complaint.

I declare, under penalty of perjury, that the foregoing is true and accurate.

Dated this 31st day of July, 1984 in Los Angeles, California.

Carmen Robledo
Carmen Robledo

86040766527

GCC#4334

85

REAVIS & McGRATH

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SIXTH FLOOR · BROADWAY PLAZA

700 SOUTH FLOWER STREET

LOS ANGELES, CALIFORNIA 90017

345 PARK AVENUE
NEW YORK N. Y. 10154

TELEPHONE 213 626-5241
TELECOPIER 213 680-4518
CABLE ADDRESS KEARN
TELEX: 69-1208

August 13, 1984

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

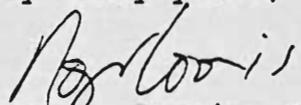
Re: MUR 1716

Gentlemen:

In connection with MUR 1716, enclosed is a copy of an Amendment to the "Twelfth Day Report" preceding the primary election on June 8, 1982, which we understand was filed with the Commission on August 6, 1984. As requested, the enclosure is submitted as an amendment to and is incorporated by reference in Exhibit F to the Reply Brief of Edmund G. Brown, Jr., et al., dated July 27, 1984 and filed with the Commission on July 30, 1984.

Please telephone the undersigned if we can furnish any further information.

Very truly yours,



Roger D. Loomis, Jr.

RDL/js

Enclosure

cc: Mr. Peter Knych (w/encl.)

86040563528

11:04:36

**AMENDMENT
DETAILED SUMMARY PA
of Receipts and Disbursements
(Page 2, FEC FORM 3)**

87

Name of Committee (in Full) :

BROWN FOR U.S. SENATE

Report Covering the Period:

From: 4/1/82

To: 5/19/82

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees <u>145,853.00</u> (Memo Entry Unitemized \$ <u>35,743.00</u>)	181,596.00	554,279.64
(b) Political Party Committees	48,850.00	64,625.00
(c) Other Political Committees	00	00
(d) The Candidate	00	00
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b, 11c and 11d)	230,446.00	618,904.64
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	00	00
13. LOANS:		
(a) Made or Guaranteed by the Candidate	00	00
(b) All Other Loans	00	00
(c) TOTAL LOANS (add 13a and 13b)	00	00
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	20.00	255.40
15. OTHER RECEIPTS (Dividends, Interest, etc.)	38,960.28	79,655.37
16. TOTAL RECEIPTS (Add 11e, 12, 13c, 14 and 15)	269,426.28	698,815.41
II. DISBURSEMENTS		
17. OPERATING EXPENDITURES	117,835.75	303,352.57
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	00	00
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate	00	00
(b) Of All Other Loans	00	00
(c) TOTAL LOAN REPAYMENTS (add 19a and 19b)	00	00
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	3,470.00	10,254.96
(b) Political Party Committees	9,000.00	9,000.00
(c) Other Political Committees	00	00
(d) TOTAL CONTRIBUTION REFUNDS (add 20a, 20b and 20c)	12,470.00	19,254.96
21. OTHER DISBURSEMENTS	00	00
22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21)	130,305.75	322,607.33

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD	\$ 1,919,238.86
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	\$ 269,426.28
25. SUBTOTAL (Add Line 23 and Line 24)	\$ 2,188,665.14
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	\$ 130,305.75
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	\$ 2,058,359.39

005040503530



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)

Brown for U.S. Senate

A. Full Name, Mailing Address and ZIP Code Political Action Council of Educators 2511 W 3rd Street Los Angeles, CA 90057	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period \$1000.
	I.D.# C00023754	4/15/82	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	

B. Full Name, Mailing Address and ZIP Code ROLMPAC 4900 Old Ironsides Dr. Santa Clara, CA 95050	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$150.
	I.D.# C00118224	4/15/82	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	

C. Full Name, Mailing Address and ZIP Code Roos for Assembly Committee 6255 Sunset Bl. Ste. 2000 Los Angeles, Ca. 90028	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$1000.
	I.D.# C00133686	5/11/82	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	

D. Full Name, Mailing Address and ZIP Code SEIU-COPE Fund PAC 2020 K. Street, N.W. Washington, D.C. 20006	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$2000.
	I.D.# C00004036	5/1/82	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	

E. Full Name, Mailing Address and ZIP Code NAPAC-United Assoc. of Journeymen & Apprentices of Plumbing & Pipefitting Industry 901 Massachusetts Ave. N.W. Washington, D.C. 20001	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$
	I.D.#	5/5/82	
Receipt For: <input checked="" 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 UAW V CAP 800 E. Jefferson Detroit, Mi. 48214	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$5000.
	I.D.# C00002840	5/17/82	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	

G. Full Name, Mailing Address and ZIP Code United Food & Commercial Workers International Union, ABC 1775 K Street, N.W. Washington D.C. 20006	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$4600.
	I.D.# C00002766	5/11/82	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	

SUBTOTAL of Receipts This Page (optional) 17,750.-

TOTAL This Period (last page this line number only)

EPSTEIN BECKER BORSODY & GREEN, P.C.

ATTORNEYS AT LAW

1140 19TH STREET, N.W.

WASHINGTON, D.C. 20036

(202) 861-0900 25 410: 50

89

250 PARK AVENUE
NEW YORK, NEW YORK 10177
(212) 370-9800

MALICK TOWER
ONE SUMMIT AVENUE
FORT WORTH, TEXAS 76102¹
(817) 334-0701

235 MONTGOMERY STREET
SAN FRANCISCO, CALIFORNIA 94104¹
(415) 398-8868

1875 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067¹
(213) 556-8861

EDWIN H. EPSTEIN
KENNETH HARFENIST^o
ARNOLD R. LEVY^o
MALCOLM MASON^{ooo}
STUART ORSHER, M.D.^o
DONALD PARTLAND^o
FREDERICK E. SMITHLINE^o
J. ROBERT STEELMAN
SIDNEY TODRES^o

¹P.C. NEW YORK AND
WASHINGTON, D.C. ONLY

JEFFREY M. BECKER
ROBERT P. BORSODY
WILLIAM A. CARMELL^o
STEVEN M. CARSEY^{oo}
STEVEN B. EPSTEIN
STUART M. GERSON
GILBERT J. GINSBURG
RONALD M. GREEN
WILLIAM A. HELVESTINE^o
GREGORY R. HIESTAND^o
ROBERT L. JAUVTIS^o
WILLIAM B. KOPIT
DAVID C. MAIN, JR.
FRANK C. MORRIS, JR.
JAMES P. MURKIN^o
WILLIAM C. OLDAKER
JOSEPH P. PARKER^{oo}
SUSAN SCHENKEL-SAVITT^o
FRANKLIN R. SEARS^{oo}
HARRY N. TURK^o
KENNETH B. WECKSTEIN

DANIEL B. ABRAHAMSON
BRIAN A. BANNON
AMY J. BEECH^o
PHILIP M. BERKOWITZ^o
CAROL S. BERNHEIM^o
STEPHEN S. BOOCHEVER
PAMELA S. BOUEY^o
PAUL BROWNSTEIN^o
DALE E. CALLENDER^o

VICTORIA E. GANON^o
ROBERT A. GOLINKO^o
KAREN BONNIE EATON
THOMAS M. FARAH
LAURENCE W. FUTTERMAN^o
PHILIP M. GASSER^o
PETER S. GRAY
DOUGLAS A. HASTINGS
LINDA B. HERSHA^o
LESLIE J. KERNAN
WAYNE A. KEUP
SANDRA R. KING
BETTYE B. KITCH^{oo}
LAWRENCE W. KOLTUN
DENNIS A. LALLI^o
DAVID H. LARRY
STEPHEN R. MILLS^o
ROBERT J. MOSES
JOY D. OBERMAN^o
INA A. PLOTSKY^o
RICHARD J. REIBSTEIN^o
ROBERT D. REIF
ARTHUR R. ROSE
LYNN E. SHAPIRO
RICHARD L. STEER^o
PETER M. STEIN
LINDA V. TIANO^o
CARRIE VALIANT
JEFFREY M. VILLET
PATRICK WESTERKAMP^o
KATHLEEN M. WILLIAMS
MICHAEL L. ZIEGLER^o

July 25, 1984

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* NOT ADMITTED WASHINGTON
** ADMITTED TEXAS ONLY
*** ADMITTED IN ENGLAND AND WALES ALSO

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

Re: MUR 1716

Dear Mr. Steele:

This letter constitutes the response of the American Federation of Teachers, Committee on Political Education and its treasurer, Robert G. Porter, (hereinafter "the Respondents") to a complaint, MUR 1716, which alleges that Respondents may have violated the Federal Election Campaign Act, 2 U.S.C. § 431, et seq. (hereinafter "the Act").

Specifically, the complaint alleges that the Respondent Committee is affiliated, pursuant to 2 U.S.C. § 441a(a)(5), with the Political Action Council of Educators (hereinafter "PACE") and, accordingly, contributions made in 1982 to the Brown for U.S. Senate Committee by Respondent Committee and PACE were in excessive of the Act's limitations.

Respondent Committee denies, however, that it is presently, or ever has been, affiliated with PACE pursuant to 2 U.S.C. § 441a(a)(5), and therefore that it has violated the Act.

ANALYSIS

Political committees established, financed, maintained or controlled by any labor organization, including any parent, branch or local unit of such labor organization, are considered "affiliated committees" pursuant to 2 U.S.C. § 441a(a)(5). Examination of the various elements of "affiliation," however, reveal that no such relationships exist between the Respondent Committee and PACE. AFT-COPE did not establish PACE, nor does it finance, maintain or control this political committee. Moreover, Complainant does not offer a scintilla of evidence to substantiate his allegation of affiliation.

Additionally, it should be noted that members of PACE are not required to belong to a particular national teachers union, but may individually select to become members of either the American Federation of Teachers or the National Education Association. This ability of PACE members to choose between the two national teacher unions underscores PACE's status as a political committee which is not affiliated pursuant to 2 U.S.C. § 441a(a)(5) with the Respondent Committee.

Accordingly, Respondent Committee denies that it is presently, or ever has been affiliated with PACE under 2 U.S.C. § 441a(a)(5), and therefore that it has violated the Act.

Thus, Respondents request that the Commission take no further action in connection with this matter. Should the Commission decide to proceed further, however, Respondents respectfully request that this matter be handled through voluntary informal conciliation at this stage in the Commission's proceedings.

Further, assuming arguendo that the Commission finds a violation(s) of the Act, Respondents contend that any such violation(s) was inadvertent, and not knowing or willful as the complaint alleges.

Sincerely,

William C. Oldaker

William C. Oldaker
Counsel for American Federation
of Teachers, Committee on
Political Education, and
Robert G. Porter, Treasurer of
the American Federation of
Teachers, Committee on Political
Education

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Michael Smolen
Leslie J. Garber
Joseph Posner
Martin S. Bakst
Bruce B. Johnson

Geffner & Satzman
A Professional Corporation
3055 Wilshire Boulevard, Suite 900
Los Angeles, California 90010
(213) 487-1520 • (213) 531-9724

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Howard Z. Rosen
Jeffrey Paule
Helena Sunny Wise
E. Alain Levi
Philip H. Smith
Leland Rosner
Judge (Ret.) William S. Hassen
Louis Rimbach
Diana Denton
Bruce A. Sackett

ATTACHMENT IV

(91)

August 2, 1984

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

Re: Political Action Council of Educators and William
Zimmerman, Treasurer, and United Teachers-Los Angeles
MUR 1716

Dear Mr. Steele:

This letter constitutes the response of the Political Action
Council of Educators and William Zimmerman, Treasurer, and the
United Teachers-Los Angeles (Respondents) to the above complaint,
MUR 1716.

the Political Action Council of Educators, United Teachers-Los
Angeles and Treasurer, William Zimmerman, are not affiliated
with the American Federation of Teachers Committee on Political
Education pursuant to 2 U.S.C. Section 441(a)(5). Based on
such lack of affiliation, the Respondents have not violated the
Act regarding any contributions made in 1982 to the Brown for
United States Senate Committee.

United Teachers-Los Angeles is an independent autonomous
teachers union representing certificated employees in the Los
Angeles Unified School District in Los Angeles, California.
The teachers as members of the United Teachers-Los Angeles
individually determine as to whether they are to become members
of either the American Federation of Teachers or the National
Education Association. PACE is a political committee organized
by United Teachers-Los Angeles and is not affiliated in any
manner with the Political Action Committee of the American
Federation of Teachers or the National Education Association.

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1 AUG 6 11:06

92

Charles N. Steele, Esq.
Re: PACE, William Zimmerman and UTLA
August 2, 1984
Page Two:

The national organizations or their committees do not in any way establish, finance, maintain or control PACE or is PACE in any manner considered an "affiliated committee" pursuant to the provisions of the Act. Specifically, AFT-COPE did not establish PACE, nor does it in any manner directly or indirectly finance, maintain or control PACE. PACE makes all independent decisions through the structure of United Teachers-Los Angeles regarding any political contributions.

Respondents request that the Commission should dismiss this complaint; however, should the Commission decide to proceed further, Respondents request that the matter be handled through the voluntary informal conciliation proceedings of the Commission.

In the event there is an eventual determination by the Commission that there was a violation of the Act, PACE and its Treasurer, William Zimmerman, and United Teachers-Los Angeles submit that any such possible violations were unintentional and were not willful as PACE, specified above, operates totally independent and without control or direction by the AFT-COPE.

Very truly yours,



LEO GEFNER
Counsel for
Political Action Council of Educators
and William Zimmerman, Treasurer, and
United Teachers-Los Angeles
LG:ayh
637A11-12

cc: UTLA
Attn: Judy Solkovits, President
William Zimmerman

86040563535

AMALGAMATED CLOTHING AND TEXTILE WORKERS UNION



AFL-CIO, CLC

15 UNION SQUARE • NEW YORK, N.Y. 10003
(212) 242-0700

ATTACHMENT II

93

SCOTT HOYMAN
Executive Vice President

MAN P12: 44
G0C#399

July 9, 1984

EXPRESS MAIL: B38663352

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

Re: MUR 1716

Dear Mr. Steele,

This is in response to your letter dated June 6, 1984 notifying Respondents, Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC"), and George Solomons, Assistant Treasurer, that a complaint had been filed alleging that excessive campaign contributions had been made in violation of the Federal Election Campaign Act of 1971 (the "Act"). The apparent contribution in excess of the statutory limit was an inadvertent clerical error misidentifying a contribution to the general election as a contribution to the primary election. For reasons more fully stated below, Respondents respectfully request that no further action be taken on this matter.

The complaint alleges that ACTWU-PAC contributed \$6,000.00 to the 1982 Federal primary election for Edmund G. Brown, Brown for U.S. Senate in violation of the \$5,000.00 statutory limit provided in § 441(a)(2)(A) of the Act. The \$1,000.00 in alleged excessive contributions to the 1982 primary election represents a \$1,000.00 contribution made on or about October 20, 1982 for the general election, just prior to the general election in November 1982. The October 1982 contribution was improperly identified as a contribution to the primary election in ACTWU-PAC's report to the Federal Election Commission. This clerical error has been corrected in the Amended Report of Receipts and Disbursement for the Thirtieth Day following the General Election on November 2, 1982, attached hereto as Exhibit #1 (Schedule B, Page 1 of 3).

86040503536

JUL 10 P 1: 28

VICE PRESIDENTS

JOHN ALLERUZO
SAMUEL J AZZINARO
KILMER CABAN
LES CALDER
FRANK CALECA
CHARLES BUD CLARK

ED CLARK
JEAN-MARC COUTURE
OLGA DIAZ
JAMES DILLON
HENRY DROPKIN
BRUCE DUNTON
GARRY FERRARIS
JOHN FOX

SAM FOX
ANGELO G GEORGIAN
HARRY GORDON
MARRION E GROCE
NICHOLAS GYORY
WILLIAM HALL
JOSEPH HUGHES
JAMES JACKSON

JAMES A JOHNSON
ARTHUR LOEY
RICHARD MacFADYEN
JOYCE D MILLER
VERA MILLER
MURRAY MORENO
FRANK NICHOLAS JR
CARMEN PAPAIE

BRUCE RAYNOR
CHARLES SALLEE
LEON SPITZER
PETER J SWOBOO
CECIL TOPPIN
JIM WALRAVEN

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Charles N. Steele
July 9, 1984
Page 2

The following review of relevant facts will demonstrate that the \$1,000.00 contribution was intended by all parties as a contribution to the general election, despite the clerical reporting error. On or about May 17, 1982, ACTWU-PAC contributed \$5,000.00 to the Brown for Senate Campaign for the California primary election in June 1982. This contribution was properly identified as a primary contribution in ACTWU-PAC's Report of Receipts and Disbursements for May 1982.^{1/} The \$5,000.00 contribution in May 1982 was the maximum allowable contribution for the primary election; 2 U.S.C. § 441. ACTWU-PAC made no additional contributions to the Brown for Senate Campaign in the primary of 1982.

Shortly before the general election in November 1982, ACTWU-PAC contributed \$1,000.00 to the Brown for Senate Campaign in a check dated October 18, 1982. The covering letter accompanying the check is silent as to whether the check was intended for the primary or general election. (Copies of the covering letter dated October 20, 1982 and check dated October 18, 1982 are attached hereto as Exhibits #2A and #2B). The regulations of the Federal Election Commission provide that a contribution not designated in writing for a particular election will be deemed for a general election if made after the date of the primary election. 11 CFR § 110.1(2)(ii)(B). The \$1,000.00 contribution of October 1982 was not designated in writing for any particular election and was made several months after the primary election in June 1982. Accordingly, the \$1,000.00 contribution is properly considered a contribution to the general election.

The parties consistently treated the \$1,000.00 October contribution to Brown for Senate Campaign as a contribution to the general election, with the exception of ACTWU-PAC's clerical reporting error. ACTWU-PAC fully intended to and did comply with the statutory ceiling of \$5,000.00 for contributions to each federal election. The pattern of making contributions to the Brown for Senate Campaign shortly before each of the primary and general elections respectively, further demonstrates that the \$5,000.00 check dated May 17, 1982 was intended for the June

^{1/}A copy of ACTWU-PAC's Report of Receipts and Disbursements for May 1982 is on file with the Federal Election Commission.

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95

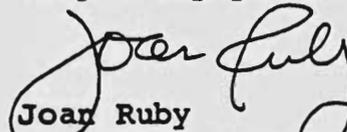
Charles N. Steele
July 9, 1984
Page 3

primary election and the \$1,000.00 check dated October 18, 1982 was intended for the November general election. Edmund G. Brown, Jr., Brown for U.S. Senate, accurately reported the \$1,000.00 contribution of October 1982 as a contribution for the general election.

As stated above, the identification of the October 18, 1982 contribution as a disbursement for the primary election was an inadvertent clerical error corrected in the amended report submitted with this letter as Exhibit #1. The clerical error misidentifying the \$1,000.00 as a contribution to the primary election should not be dispositive of the designation of the contribution, where the conduct of the parties and the application of Federal Election Commission regulations require that it be treated as a contribution to the general election. The accurate and most reasonable construction of the facts in this case is that ACTWU-PAC complied with that statutory limits in making contributions to the primary and general election for the Brown for Senate Campaign in 1982.

For the foregoing reasons, Respondents respectfully request that no further action be taken on this matter and that the complaint be dismissed.

Very truly yours,



Joan Ruby
Assistant General Counsel

JR/vk
Attachment

cc: Kenneth A. Gross, Associate General Counsel
Peter Kynch
George Solomons
Liz Smith
Arthur M. Goldberg
George A. Kirschenbaum

8604033538

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

FEC

96

84 JUL 10 P12:44

(Summary Page)

ALIGN AREA ALIGN AREA

1. Name of Committee (In Full)
**AMALGAMATED CLOTHING AND TEXTILE WORKERS UNION
POLITICAL ACTION COMMITTEE**

Address (Number and Street)
15 UNION SQUARE

City, State and ZIP Code
NEW YORK, NEW YORK 10003

Check here if address is different than previously reported.

2. FEC Identification Number
C 00005728

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 _____
 Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____

Thirtieth day report following the General Election
on 11/2/82 in the State of APP states

Termination Report

(b) Is this Report an Amendment?
 YES NO

SUMMARY

5. Covering Period 10/14/82 through 11/22/82

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

(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))

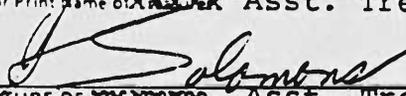
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)

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
6(a)		\$ 59,534.99
6(b)	\$ 9,216.79	
6(c)	\$ 38,459.35	\$ 155,898.10
6(d)	\$ 47,676.14	\$ 215,433.09
7	\$ 14,531.50	\$ 182,288.45
8	\$ 33,144.64	\$ 33,144.64
9	\$	
10	\$	

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

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

GEORGE SOLOMONS
 Type or Print Name of ~~XXXX~~ Asst. Treasurer

 SIGNATURE OF ~~XXXX~~ Asst. Treasurer

June 29, 1984
 Date

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

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

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FEC FORM 3X (3/80)

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

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Name of Committee (in Full)	Report Covering the Period:	
Alameda Clothing and Textile Workers Union Political Action Committee	From: 10/14/82 to: 11/22/82	
	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
	I. RECEIPTS	
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	24,459.35	120,548.10
(Memo Entry Unitemized \$ <u>24,439.35</u>)		
(b) Political Party Committees		
(c) Other Political Committees	24,459.35	120,648.10
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)	24,459.35	120,648.10
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	14,000.00	35,000.00
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		250.00
17. OTHER RECEIPTS (Dividends, Interest, etc.)		
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)	38,459.35	155,998.10
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES		
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	11,100.00	167,071.47
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
22. INDEPENDENT EXPENDITURES (Use Schedule E)		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 431(d)) (Use Schedule F)		
24. LOAN REPAYMENTS MADE		
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)		
27. OTHER DISBURSEMENTS	3,431.50	15,216.98
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	14,531.50	182,288.45
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d		
30. TOTAL CONTRIBUTION REFUNDS from Line 26d		
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)		
32. TOTAL OPERATING EXPENDITURES from Line 19		
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)		

86040503540

98

LINE NUMBER 11
List separate schedule(s) for each category of the Data on 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)
Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Scott Hoyman 81 E Newell Avenue Rutherford, N.J. 07070	Amalgamated Clothing and Textile Workers Union New York, New York	10-29-82	20.00
Receipts For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice-President		
	Aggregate Year-to-Date-\$ 240.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipts For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date-\$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipts For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date-\$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipts For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date-\$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipts 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
Receipts For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date-\$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipts For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date-\$		

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only) 20.00

SCHEDULE A

ITEMIZED RECEIPTS

99

LINE NUMBER 12
 Use this schedule 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)
Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code Chicago and Central States Joint Board ACTWU Political Education Committee 333 So. Ashland Blvd. Chicago, Ill 60607	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	10-21-82	10,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 30,000.00		

B. Full Name, Mailing Address and ZIP Code Committee on Political Education, AFL_CIO 815 16th Street, N.W. Washington, D. C. 20006	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	11-8-82	4,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

C. Full Name, Mailing Address and ZIP Code 42	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-\$		

D. Full Name, Mailing Address and ZIP Code 30	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-\$		

E. Full Name, Mailing Address and ZIP Code 50	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	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-\$		

G. Full Name, Mailing Address and ZIP Code	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-\$		

TOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only) 14,000.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

100

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)

Amalgamated Clothing and Textile Workers Union Political Action Committee

8 6 0 4 0 5 3 3 4 3

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bob Shamansky for Congress Committee 101 No. High St. P.O. Box 15668 Columbus, Ohio 43215 OHIO	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	300.00
Paul Simon Congress Committee 231 West Maine, Apt. East Carbondale, Ill. 62901 ILL.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	500.00
Aukerman for Congress Committee P.O. Box 172 Providence, R.I. 02901 R.I.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	250.00
Brown for Senate Campaign 1125 West 6th St. Los Angeles, Calif. 90017 CALIF.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	1000.00
James McClure Clarke for Congress P.O. Box 7434 Asheville, No. Car. 28817 NO. CAR.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	300.00
Friends of Bob Carr 2110 East Michigan Lansing, Mich. 48912 MICH.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/22/82	2000.00
Monsma for Congress 829 North Kentview, N.E. Grand Rapids, Mich. 49505 MICH.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/22/82	2000.00
Committee to Re-elect Leo C Zeffereetti C/O Joseph F. DeFina P.O. Box 221-Red Hook Station Brooklyn, N.Y. 11231 N.Y.	Tickets Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/22/82	100.00
Offner for Congress 1507 Losey Boulevard, South LaCrosse, Wisc. 54601 WISC.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	50.00

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

101

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)			
Amalgamated Clothing and Textile Workers Union Political Action Committee			
A. Full Name, Mailing Address and ZIP Code Keep Kastenmeier in Congress P.O. Box 24236 Washington, D.C. 20024 WISC	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	200.00
B. Full Name, Mailing Address and ZIP Code Ratie Hall for Congress 637 Broadway Gary, Ind. 46402 IND.	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	1000.00
C. Full Name, Mailing Address and ZIP Code Major Owens for Congress Committee 1125-29 Eastern Parkway Brooklyn, N.Y. 11213 NEW YORK	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	250.00
D. Full Name, Mailing Address and ZIP Code San Gejderson for Congress P.O. Box 1982 Bozrah, Conn. 06334 CONN	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	50.00
E. Full Name, Mailing Address and ZIP Code The Committee to Elect Ken Mosley P.O. Drawer 1569 Orangeburg, So. Car. 29115 SO. CAR.	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	250.00
F. Full Name, Mailing Address and ZIP Code Friends of Bob Carr 2110 East Michigan Lansing, Mich. 48912 MICH	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	500.00
G. Full Name, Mailing Address and ZIP Code Robin Britt for Congress P.O. Box 222 122 East Market St. Greensboro, No. Car. 27402 NO. CAR.	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	300.00
H. Full Name, Mailing Address and ZIP Code Esiason Congressional Campaign Comm. P.O. Box 72 North Granville, N.Y. 12854 NEW YORK	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	250.00
I. Full Name, Mailing Address and ZIP Code Jim Guest for U.S. Senate P.O. Box 1438- 34 Main Street Montpelier, Vermont 05602 VERMONT	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	500.00
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

LINE NUMBER 21
 (Use separate schedules for each category of the Detailed Summary Page)

102

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)

Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Frank Harrison for Congress Committee 15 South Franklin Street Wilkes Barre, Pa. 18711 PENNA	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	300.00
Terry Mann for Congress 731 Madison Avenue Covington, Kentucky 41011 KY.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	200.00
Don Mills for U.S. Congress Box 1124 Frankfort, Kentucky 40602 KY.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	250.00
Committee to Re-elect Wyche Fowler 207 C Street, S. E. Washington, D. C. 20003 GA.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/28/82	300.00
James J. Florio for Congress Committee P O Box 8028, Southwest Station Washington, D. C. 20024 N.J.	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/22/82	250.00
(Empty)	(Empty)	(Empty)	(Empty)
(Empty)	(Empty)	(Empty)	(Empty)
(Empty)	(Empty)	(Empty)	(Empty)
(Empty)	(Empty)	(Empty)	(Empty)
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			11,100.00

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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)
Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Allen Ertel Democratic City Committee 1421 Walnut St. Philadelphia, Pa. 19102 For Gov. Pa.	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-14-82	1,000.00
B. Full Name, Mailing Address and ZIP Code Pottsville Republican 111 Mahantongo Street Pottsville, Pa. 17901	Newspaper Advertisement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-14-82	271.50
C. Full Name, Mailing Address and ZIP Code Rocks for Senate Committee 7707 Ridge Avenue Philadelphia, Pa. 19128 State Senate - Pa	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-18-82	500.00
D. Full Name, Mailing Address and ZIP Code 1st Legislative District Organiza- tion 125 E. Broad Street Hazelton, Pa. 18201	Tickets Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-22-82	100.00
E. Full Name, Mailing Address and ZIP Code John F. Kennedy-David L. Lawrence Annual Dinner - Suite 1100 Manor Bldg. 564 Forbes Avenue Pittsburgh, Pa. 15219	Tickets Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-22-82	100.00
F. Full Name, Mailing Address and ZIP Code Allen Ertel Committee 14 Wood Street 1203 West Penn Bldg. Pittsburgh, Pa. 15222 For Gov. Pa	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-26-82	500.00
G. Full Name, Mailing Address and ZIP Code As per listing attached	Polling Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/28,29	960.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			3,231.50

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Amalgamated Clothing and Textile Workers Union Political Action Committee

Francis Gardner	Pottsville, Pa. 17901	\$25.00	
Frances Ludwig	Pottsville, Pa. 17901	\$25.00	
Joan Botto	Pottsville, Pa. 17901	25.00	
Michael Sninsky	Port Carbon, Pa. 17965	25.00	
Helen Weiss	Pottsville, Pa. 17901	25.00	
Agnes Herst	Pottsville, Pa. 17901	25.00	
Charles Dreis	Pottsville, Pa. 17901	25.00	
Barbra Weiss	Pottsville, Pa. 17901	25.00	
Setty Hellman	Minersville, Pa. 17954	25.00	
Stella Ryder	Frackville, Pa. 17931	25.00	
Margaret Kuchta	Frackville, Pa. 17931	25.00	
Joseph Martin	Frackville, Pa. 17931	25.00	
Helen Dower	Frackville, Pa. 17931	25.00	
Frank Brown	Pine Grove, Pa. 17963	25.00	
Bill Alonge	Brockton, Pa. 17925	25.00	
N Pilo	Brockton, Pa. 17925	25.00	
Maryann Hiskie	New Philadelphia, Pa. 17959	25.00	
Harry Hahn	Maryd, Pa. 17952	25.00	
Frances Guzik	Shamokin, Pa. 17872	25.00	
Genevieve Daniels	Shamokin, Pa. 17872	25.00	
Wynne Loeper	Shamokin, Pa. 17872	25.00	
Rosemary Keegan	Shamokin, Pa. 17872	25.00	
Frances Yoblonski	Shamokin, Pa. 17872	25.00	
Joseph Fritz	McAdoo, Pa. 18237	25.00	
Joseph Billett	McAdoo, Pa. 18237	25.00	
Patricia Salata	McAdoo, Pa. 18237	25.00	
Daniel Friendly	McAdoo, Pa. 18237	25.00	
Catherine Barkanik	Freeland, Pa. 18224	25.00	
Ann Marie Kopczinski	Freeland, Pa. 18224	25.00	
Almina Di Fio	Freeland, Pa. 18224	25.00	
Rosemary Buchman	Freeland, Pa. 18224	25.00	
Irene Chernetsky	Hazleton, Pa. 18201	25.00	
Ann Tucci	Hazleton, Pa. 18201	25.00	
Rose Kern	Mahanoy City, Pa. 17948	25.00	
Gary Myslewicz	Mahanoy City, Pa. 17948	25.00	
Margaret Igo	Mahanoy City, Pa. 17948	25.00	
Grace Sabol	Mahanoy City, Pa. 17948	25.00	
Mary Davendish	Mahanoy City, Pa. 17948	25.00	
Patricia Kurdinsky	Mahanoy City, Pa. 17948	25.00	
Joe Echo	Mahanoy City, Pa. 17948	25.00	
Ethel Joyce	Pottsville, Pa. 17901	(20.00)	1981 ck voided
Joan Botto	Pottsville, Pa. 17901	(20.00)	1981 ck voided

960.00



POLITICAL ACTION COMMITTEE

15 Union Square, New York, N.Y. 10003 (212) 255-7800

Murray H. Finley
Chairman

Jacob Sheinkman
Treasurer

Sol Stein
Senior Vice Chairman

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WASHINGTON OFFICE

Elizabeth M. Smith
Director, Legislative
and Political Education

Room 310
15 16th Street, N.W.
Washington, D.C. 20006
(202) 628-0214

October 20, 1982

Honorable Jerry Brown
1125 West 6th Street
Los Angeles, California 90017

Dear Gov. Brown:

We are pleased to enclose our check in the amount of \$1,000.00 as a contribution to your campaign for the U.S. Senate.

May we take this opportunity to convey our hope that we may have your support in connection with issues which affect the members of the Amalgamated Clothing and Textile Workers Union, whose voluntary donations have made this contribution possible.

Our best wishes to you for a very successful campaign.

Very truly yours,

Murray H. Finley
Chairman

Jacob Sheinkman
Treasurer

mhf/js
rs
enc.

Exhibit #2A

86040363548

- Enc # 3786
: 36

INTERNATIONAL LADIES' GARMENT WORKERS' UNION

AFL-CIO

1710 BROADWAY • NEW YORK, N.Y. 10019

CABLE ADDRESS: ILGWU—NEW YORK • PHONE: 212-265-7000

LEGAL DEPARTMENT

MAX ZIMNY
General Counsel

~~SECRET~~
ATTACHMENT VI

June 22, 1984

(116) (107)

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

Re: MUR 1716
Attention: Peter Knych

Dear Sir:

Enclosed is the response to the complaint in the captioned case filed on behalf of the ILGWU Campaign Committee and its Treasurers.

Also enclosed is a designation of the undersigned as counsel.

Sincerely yours,

Max Zimny
Max Zimny
General Counsel

MZ:cs
Enclosure
Certified Mail R.R.R.

86040503550

STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

Evelyn Dubrow, being duly sworn, deposes and
says:

1. I am Executive Secretary of the International Ladies' Garment Workers' Union Campaign Committee ("ILGWU Campaign Committee"). I also occupied that position in 1982. I am fully familiar with all of the facts and circumstances concerning the events set forth in the complaint in MUR 1716 with respect to the ILGWU Campaign Committee.

2. My principal office is in Washington D.C. Checks for political contributions from ILGWU Campaign Committee issue from the office of the Campaign Committee in New York City. I regularly instruct the clerical employees of the Campaign Committee in New York by phone from my Washington office regarding political contributions.

3. In 1982, I issued instructions by phone to Carol Friedman, a clerical employee in New York, regarding contribution from the ILGWU Campaign Committee to the Brown for U.S. Senate Committee. Ms. Friedman was then a new employee with limited experience with political campaign contributions.

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4. In early April 1982, I instructed Ms. Friedman by phone from Washington to make a \$4,000 contribution from the ILGWU Campaign Committee to the Brown for U.S. Senate Committee for the primary election, and she did so on April 14, 1982. In August 1982, I instructed Ms. Friedman by phone from Washington to make two separate contributions from the Campaign Committee to the Brown for U.S. Senate Committee for the general election, and she did so on August 16, 1982 in the amount of \$1,000, and on August 7, 1982 in the amount of \$4,000.

5. As best I can recollect, in early October 1982, I was informed that the Brown Committee needed additional contributions to overcome a primary election deficiency, and I instructed Ms. Friedman by phone from Washington to make a \$1,000 contribution from the ILGWU Campaign Committee to the Brown for U.S. Senate Committee for the primary election. She sent this contribution on October 6, 1982, but, in error, noted it on her records as a contribution for the general election. Her error was carried in the report filed from New York with the Federal Election Commission for the month of October 1982.

6. My instructions to Ms. Friedman are reflected in the records of campaign contributions which I independently maintain in my Washington office. Attached hereto as Exhibit "A"

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is a copy of my record of campaign contributions to Brown in 1982. As can be seen, it indicates primary election contributions to Jerry Brown on April 14, 1982 of \$4,000 and on October 7, 1982, of \$1,000, and two general election contributions in August of \$1,000 and \$4,000, respectively. On June 12, 1984, the ILGWU Campaign Committee filed an amended report with the Federal Election Commission of campaign contributions for the month of October 1982 which corrected the aforesaid error.

7. I respectfully submit that the ILGWU Campaign Committee contributions to Brown in 1982 for the primary and general elctions did not exceed the separate \$5,000 limits provided by law.

Evelyn Dubrow

Evelyn Dubrow

Sworn to before me this
22nd day of June, 1984

Max Zimny

Notary Public

MAX ZIMNY
Notary Public, State of New York
No. 30-4392568
Qualified in Nassau County
Certificate filed in New York
Commission Expires March 1985

86040583553

PRIMARY, JUNE 8

CALIFORNIA

5/12/82

* denotes COPE endorsed

SENATE

DEMOCRATS

*Jerry Brown
Paul Carpenter
Tom Cardenas
Arthur Shingleton
Gore Vidal
Dan Whitehurst
William Wertz

REPUBLICANS & OTHERS

Theodore Bruinsma
Bob Dornan
Barry Goldwater, Jr.
Pete McCloskey
Maureen Reagan
Pete Wilson
William Shockley

CONTRIBUTIONS

\$4,000 4/14/82 straight
\$1,000 (2/82) - "
\$4,000 (2/82) "
\$1,000 (10/7/82) "

REMARKS

Incumbent S.I. HAYAKAWA not running again

HOUSE OF REPRESENTATIVES

DISTRICT

DEMOCRATS

1st ✓ *Douglas Bosco
Mike Koepf

2nd Jack Carrico
John Newmeyer

3rd * Robert Matsui (Inc.)

4th *Vic Fazio (Inc.)

5th *Phil Burton (Inc.)

REPUBLICANS & OTHERS

Don Clausen (Inc.)
David Rediok (Lib.)

Eugene Chappie (Inc.)
Howard Fogarsky (Peace)

John Reiger (Peace)
Bruce Daniel (Lib.)

Roger Canfield
Michael Clancy
Cy Stevenson

Milton Marks
Tom Spinosa
Justin Patmondo (LIB.)

CONTRIBUTIONS

\$500 (6/1/82) - straight
\$500 (3/13/82) - "
\$500 (10/1/82) "
\$500 10-23-82 "

\$350 8/26/81 (tkts.)
\$200 (6/1/82) - straight
\$750 (8/82) - "

\$300 5/5/81 (tkts.)
\$250 (6/1/82) - straight
\$450 (3/82) - "

\$750 8/25/81 straight
\$500 (6/1/82) - straight
\$750 (8/82) - "
\$4,000 (10/1/82) "
\$1,000 (10/2/82) "

REMARKS

RECEIVED
June 9, 1982
H. G. W. U.
LEGAL DEPT.

EXHIBIT "A"

8 5 0 4 0 5 8 3 5 4

1/2

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

James Edward Antosh
13 Gilpin
Shawnee, Oklahoma 74801

Complainant,

v.

Edmund G. Brown, Jr.; Brown for
U.S. Senate; American Federation
of Teachers, Committee on
Political Education and its
affiliated separate segregated
fund, Political Action Council
of Educators; Amalgamated
Clothing and Textile Workers
Union Political Action Committee;
International Ladies Garment
Workers Union Campaign Committee,
and all the Committees'
treasurers,

Respondents.

MUR No. 1716

COMPLAINANT'S RESPONSE
TO REPLY OF EDMUND G.
BROWN, JR., BROWN FOR
U.S. SENATE COMMITTEE,
JULES GLAZER AND BURT
PINES

US 10 p 4: 12

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I. INTRODUCTION

On July 30, 1984, Complainant received a copy of the Reply of Edmund G. Brown, Jr., Brown for U.S. Senate Committee ("Committee" or "Respondent"), Burt Pines and Jules Glazer.¹ The Complainant takes exception to the Respondent's Reply and states the following:

1) The American Federation of Teachers - Committee on Political Education ("AFT-COPE") and Political Action Council of Educators ("PACE") are affiliated organizations within the meaning of 2 U.S.C. §441a(a)(5).

2) The Committee Treasurer failed to accurately report the \$1,000.00 contribution made by PACE on April 5, 1982.

3) According to the reports filed with the Federal Election Commission ("Commission"), the Committee received excessive contributions from the Amalgamated Clothing and Textile Workers Political Action Committee ("ACTWU-PAC") for the 1982 federal primary election.

4) The Committee received excessive contributions from the International Ladies Garment Workers Union Campaign Committee ("ILGWUCC") for the 1982 federal general election.

¹The Complainant did not receive a copy of the briefs filed by the other respondents. "Respondent" herein refers only to Edmund G. Brown, Jr., Brown for U.S. Senate Committee, Burt Pines and Jules Glazer.

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II. DISCUSSION

A. The American Federation of Teachers-Committee on Political Education ("AFT-COPE") and Political Action Council of Educators ("PACE") are Affiliated Organizations.

The Respondent states that AFT-COPE and PACE have taken the position before the Commission that they are not affiliated organizations. It is Complainant's belief that both AFT-COPE and PACE are separate segregated funds of the American Federation of Teachers ("AFT"), and that, therefore, contributions made by AFT-COPE and PACE 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).

PACE designated United Teachers - Los Angeles ("UTLA") as an affiliated or connected organization on its Statement of Organization. (See Exhibit A). UTLA has not filed a Statement of Organization with the Commission. However, in a letter dated October 25, 1983, the treasurer of PACE notified the Commission that the name United Teacher - Los Angeles will appear on all of its future statements. (See Exhibit B). The UTLA letterhead lists its officers which includes AFT Vice-President Michael Bennett in his official capacity. Since AFT-COPE and PACE are each affiliated with AFT, contributions made by AFT-COPE and PACE are treated as contributions from a single committee.

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B. The Treasurer of the Brown for U.S. Senate Committee Failed to Accurately Report the \$1,000 Contribution Made By PACE on April 5, 1982.

The Respondent states that the Committee treasurer clearly designated the \$1,000.00 contribution made by PACE on April 5, 1982, and received by the Committee on April 15, 1982, as for the primary election. The contribution in question is designated for the primary election on the copy of the Committee's report which was submitted with the Respondent's Reply. (See Exhibit C and Exhibit F of Respondent's Reply). However, the contribution is not designated for either election on the report which was filed with the Commission (See Exhibit D and Affidavit of Krista L. Peterson, attached hereto as Exhibit E). Therefore, the treasurer of the Committee violated 11 C.F.R. §104.14(d) by failing to accurately report the \$1,000.00 contribution.

C. The Committee Treasurer Properly Reported the \$4,425.00 Contribution Made By AFT-COPE on August 12, 1982.

The Complaint states that AFT-COPE made a \$5,000.00 contribution and a \$4,425.00 contribution on May 26, 1982 which were designated as contributions for the primary election. After reexamination of the reports, it appears that AFT-COPE amended its original report to redesignate the \$5,000.00 contribution as \$4,425.00 for the primary election and \$575.00 for the general election.

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Complainant believed that AFT-COPE made two separate contributions on May 26, 1982 rather than one contribution which was amended. The Complainant believed that the \$5,000.00 contribution was received on June 5, 1982 and that the \$4,425.00 contribution for the primary election was received by the Committee on August 18, 1982. However, it appears that the Respondent is correct in stating that the \$4,425.00 contribution which was received on August 18, 1982, was made on August 12, 1982 and designated by AFT-COPE as a contribution for the general election. Therefore, it is now Complainant's belief that the \$4,425.00 contribution was properly reported by the Committee's treasurer as a contribution for the general election.

D. According to the Reports Filed With the Commission, the Committee Received Excessive Contributions from the Amalgamated Clothing and Textile Workers Political Action Committee ("ACTWU-PAC").

The Respondent states that it did not receive excessive contributions from ACTWU-PAC for the 1982 primary election. The Committee received a \$5,000.00 contribution on May 27, 1982 and a \$1,000.00 contribution on November 4, 1982 which were reported by ACTWU-PAC as contributions for the primary election. The Respondent alleges that the \$1,000.00 contribution was not designated for a particular election and submits a copy of the check (See Exhibit F and Respondent's Exhibit G). The Respondent

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further states that since the contribution was not designated in writing as for a particular election and was made after the primary election, it is considered a contribution for the general election in accordance with 11 C.F.R. §110.1(a)(2)(ii)(B).

Complainant has relied on the public records which indicate that a violation of the Federal Election Campaign Act ("Act") has occurred. ACTWU-PAC reported the \$1,000.00 contribution as for the primary election on its FEC Form 3X, Schedule B. The Respondent states that this was a clerical error and that ACTWU-PAC has since amended its report. The amendment was filed on July 11, 1984, after the Complaint was filed. (See Exhibit G).

Since public citizens are not privy to the correspondence between political action committees and candidate committees which accompany contributions, they must be able to rely on the public records. 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 or statement contained in it." This provision is rendered meaningless if a treasurer of a political committee is relieved of all liability by merely stating that a violation which has appeared in the public records for two years is the result of a "clerical error." To allow a treasurer to amend reports to allegedly comply with the Act post hoc in response to a complaint, without imposing any sanctions, is to vitiate the purpose of the Act.

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E. The Committee Received Excessive Contributions from the International Ladies Garment Workers Union Campaign Committee ("ILGWUCC") for the 1982 Federal General Election.

The Respondent admits that it received a total of \$6,000.00 from the ILGWUCC for the 1982 federal general election. However, the Committee argues that the receipt of the excess contribution of \$1,000.00 should not constitute a violation of 2 U.S.C. §441a(f) because it was the result of a clerical error and because the \$1,000.00 has subsequently been refunded. Neither of these responses is satisfactory.

First, the Committee states that the \$4,000.00 contribution was recorded as a contribution from the "International Ladies Garment Workers Union." The two additional contributions were reported as contributions from the "ILGWU." The Respondent alleges that because of this clerical error, the Committee did not know that the contributions were from the same organization. It is difficult to believe that the treasurer used "best efforts" when he accepted contributions from an organization with an abbreviated name without attempting to discover what the abbreviation stood for.

Furthermore, the refund of the contribution almost two years after it was accepted is not a sufficient remedy. The Complainant recommends that the Respondent also be required to return the interest on the \$1,000.00 and that a civil penalty be levied against the Respondent for violating the Act. Unless

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some sanction is imposed, candidate committees can accept excessive contributions with impunity and later return the money without interest only if a complaint is filed. This result would permit the Committee to benefit from its own violation.

III. CONCLUSION

As documented above, the Respondent has violated the Federal Election Campaign Act. Complainant requests that Respondents be required to return the accepted excess contributions with interest and that civil sanctions be imposed on the Respondent.

Michael Ernest Avakian
Michael Ernest Avakian
Center on National Labor Policy

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

Attorneys for Complainant

August 10, 1984

85040583562

VERIFICATION OF CITIZEN COMPLAINT

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 Response to Reply of Edmund G. Brown, Jr., Brown for U.S. Senate Committee, Jules Glazer and Burt Pines and know the contents thereof, and that the same is true on information and belief. This Response 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 E. Antosh

Subscribed and sworn to before me this 7th day of August 1984.

Merise K. Almon
Notary Public

My Commission expires:

Sept. 17, 1986

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048721

UNITED STATES HOUSE OF REPRESENTATIVES

Washington, D.C.

1001-2-70-03

121

REGISTRATION FORM AND STATEMENT OF ORGANIZATION

POLITICAL COMMITTEE

New Registration
 Registration Amendment
ID. # _____

HAND DELIVERED

SEE REVERSE SIDE FOR ADDITIONAL INSTRUCTIONS
ALL QUESTIONS MUST BE ANSWERED FOR NEW REGISTRATIONS

1. Full name of committee: Political Action Council of Educators
Mailing address and ZIP code: 234 Loma Drive, Los Angeles, CA 90026
Telephone number: 213-483-8611

2. Affiliated or connected organizations:

Name of affiliated or connected organization	Mailing address and ZIP code	Relationship
United Teachers-Los Angeles	234 Loma Drive, L. A. CA 90026	Membership generally similar

3. Area, scope and jurisdiction of the committee:

- (a) Will this committee operate in more than one State? no
- (b) Will it operate on a statewide basis in one State? no
- (c) Will it primarily support candidates seeking State or local office? yes
- (d) Will it support a candidate for the U.S. House of Representatives in an aggregate amount in excess of \$1,000 during the calendar year? yes

4. (a) If the committee is supporting individual candidates for the U.S. House of Representatives, list each candidate by name, address, office sought, and party affiliation:

Full names of candidates	Mailing address and ZIP code	State and Congressional District	Party
Arlene Mathews	7118 Topanga Canyon Blvd., Canoga Park, CA 91303	20 CD	D
Robert White	12316 E. Firestone Blvd., Norwalk, Calif. 90650	33 CD	

(b) List by name, address, office sought, and party affiliation, any candidate for other Federal or public office that this committee is supporting:

Full names of candidates	Mailing address and ZIP code	Office sought	Party
Alan Cranston	6420 Wilshire Blvd., Los Angeles, CA 90048	Senator Calif.	D

5. If this committee is supporting the entire ticket of a party, give name of party: _____

*Obtain additional information on separate continuation sheet appropriate label not attached to this Statement of Organization, include in the appropriate box above when information is continued on separate page(s).

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74000752053

RECEIVED AT THE FEC



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EXHIBIT B
122

OFFICERS

- JUDY SOLOVITS
President
- FRANCIS HAYWOOD
N.E.A. Vice President
- MICHAEL BENNETT
A.F.T. Vice President
- ELISE AKITA MYERS
Elementary Vice President
- MARVIN KATZ
Secondary Vice President
- ROBERTA LEAP
Secretary
- GERALD REEDY
Treasurer

October 25, 1983

Federal Election Commission
13 K Street
Washington, D. C. 20463

Attn: Pamela Brown

Dear Ms. Brown:

We received your letter dated October 13, 1983, yesterday, regarding our Political Report dated September 27, 1983.

As per your telephone conversation this morning with Eve Johnson of our office, we are notifying you that as of this date the name United Teachers-Los Angeles will appear on all statements filed hereafter.

Very truly yours,

Gerald A. Reedy
Gerald A. Reedy
Treasurer

GAR/ej
opeiu #30
af1-cio,clc

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123

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)
Brown for U.S. Senate

850403031568

A. Full Name, Mailing Address and ZIP Code Political Action Council Of Educators 2511 W 3rd Street Los Angeles, CA 90057	Name of Employer I.D.# C00023754	Date (month, day, year) 4/15/82	Amount of Each Receipt This Period \$1000.
	Occupation 		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

B. Full Name, Mailing Address and ZIP Code ROLMPAC 4900 Old Ironsides Dr. Santa Clara, CA 95050	Name of Employer I.D.# C00118224	Date (month, day, year) 4/15/82	Amount of Each Receipt This Period \$150.
	Occupation 		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

C. Full Name, Mailing Address and ZIP Code Roos for Assembly Committee 6255 Sunset Bl. Ste. 2000 Los Angeles, Ca. 90028	Name of Employer I.D.# C00133686	Date (month, day, year) 5/11/82	Amount of Each Receipt This Period \$1000.
	Occupation 		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

D. Full Name, Mailing Address and ZIP Code SEIU-COPE Fund PAC 2020 K. Street, N.W. Washington, D.C. 20006	Name of Employer I.D.# C00004036	Date (month, day, year) 5/1/82	Amount of Each Receipt This Period \$2000.
	Occupation 		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

E. Full Name, Mailing Address and ZIP Code UAP&C-United Assoc. of Journeymen & Apprentices of Plumbing & Pipe-Fitting Industry 901 Massachusetts Ave. N.W. Washington, D.C. 20001	Name of Employer I.D.#	Date (month, day, year) 5/5/82	Amount of Each Receipt This Period \$1000.
	Occupation 		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

F. Full Name, Mailing Address and ZIP Code UAW V CAP 800 E. Jefferson Detroit, Mi. 48214	Name of Employer I.D.# C00002840	Date (month, day, year) 5/17/82	Amount of Each Receipt This Period \$5000.
	Occupation 		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

G. Full Name, Mailing Address and ZIP Code United Food & Commercial Workers International Union, ABC 1775 K Street, N.W. Washington D.C. 20006	Name of Employer I.D.# C00002766	Date (month, day, year) 5/11/82	Amount of Each Receipt This Period \$4600.
	Occupation 		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

SUBTOTAL of Receipts This Page (optional) **7,750.-**

TOTAL This Period (last page this line number only)

Exhibit P
 Page 2 of 4 for
 LINE NUMBER 116
 (Use separate schedules for each category of the Detailed Summary Page)

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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)
 Brown for U.S. Senate

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Political Action Council Of Educators 2511 W 3rd Street Los Angeles, CA 90057	I.D.# C00023754	4/15/82	\$1000.
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year-to-Date-\$	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
POLIMPAC 4400 Old Ironsides Dr. Santa Clara, CA 95050	I.D.# C00118224	4/15/82	\$150.
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year-to-Date-\$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Reps for Assembly Committee 6255 Sunset Bl. Ste. 2000 Los Angeles, Ca. 90028	I.D.# C00133686	5/11/82	\$1000.
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year-to-Date-\$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
CHIU-COPE Fund PAC 2020 K. Street, N.W. Washington, D.C. 20006	I.D.# C00004036	5/1/82	\$2000.
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year-to-Date-\$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
UAFAC-United Assoc. of Journeymen & Apprentices of Plumbing & Pipe-Fitting Industry 901 Massachusetts Ave. N.W. Washington, D.C. 20006	I.D.#	5/5/82	\$1000.
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
LAW V CAP 800 E. Jefferson Detroit, Mi. 48214	I.D.# C00002840	5/17/82	\$5000.
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year-to-Date-\$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
United Food & Commercial Workers International Union, ABC 1775 F Street, N.W. Washington D.C. 20006	I.D.# C00002766	5/11/82	\$4600.
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year-to-Date-\$	
SUBTOTAL of Receipts This Page (optional)			
TOTAL Receipts on this page (this line number only)			

9 2 0 0 7 1 7 0

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

James Edward Antosh
13 Gilpin
Shawnee, Oklahoma 74801

Complainant,

v.

MUR No. 1716

Edmund G. Brown, Jr.; Brown for
U.S. Senate; American Federation
of Teachers, Committee on
Political Education and its
affiliated separate segregated
fund, Political Action Council
of Educators; Amalgamated
Clothing and Textile Workers
Union Political Action Committee;
International Ladies Garment
Workers Union Campaign Committee,
and all the Committees'
treasurers,

Respondents.

AFFIDAVIT OF KRISTA L. PETERSON

COMMONWEALTH OF VIRGINIA)

) ss.

FAIRFAX COUNTY)

I, Krista L. Peterson, do hereby affirm and swear that
I have personal knowledge of the facts set forth herein:

1. I am a citizen of the United States and am over the age of 18 years.
2. I am an intern for the Center on National Labor Policy, Inc.

86040503568

3. On August 1, 1984, I photocopied a candidate committee report FEC FORM 3, Schedule A, FEC Microfilm # 82020071976, at the public records office of the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463.

4. The document which I photocopied is attached hereto as Exhibit D.

Further Affiant sayeth naught.

Krista L. Peterson
Krista L. Peterson

Sworn before me this 2nd day of August, 1984.

James D. Skelton
Notary Public
My Commission expires: September 7, 1985

35040703569

Exhibit F

127

202-879-1400

AMERICAN FEDERATION OF TEACHERS
COMMITTEE OF POLITICAL EDUCATION

I.D.# 23-7267967 917

May 26 19 82 5:40 11

Brown For U.S. Senate

\$ 5000.00

PAY TO THE
ORDER OF

FIVE THOUSAND DOLLARS

DOLLARS

UNDEPOSITED

Charles H. ...
Robert ...

⑈000917⑈ ⑆0540⑈0004⑈ 3 526 77⑈

[Handwritten signature]

86040503570

X

**Statement of Organization
 For a Political Committee**

Supporting any candidate for federal office and anticipating contributions or expenditures in excess of \$1,000 in any calendar year in support of such candidate(s).
 (See Reverse Side For Instructions.)

ATTACHMENT VIII

RECEIVED
 ELECTION

130

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

76 OCT 18 9 23

1(a) Name of Committee (in full) Check if name or address is changed
 American Federation of Teachers Committee on Political Education

2 Identification Number
 C-0000 01

(b) Address (number and street)
 11 Madison Circle, N.Y.C.

3 Date
 October 1, 1976

(c) City, State and ZIP code
 New York, N.Y. 10017

4 Is this an amended statement? Yes No
 If "YES" FILL IN ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE

5 Check one

(a) This committee has been designated as the principal campaign committee for _____ (Name of Candidate) a candidate for _____ in the _____ Election (Federal office sought) (Year of election) to be held in the State of _____ (State in which election is held)

(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

(b) This committee is supporting only one candidate, and is authorized by _____ (Name of Candidate) to receive contributions and make expenditures with respect to the _____ Election(s) (General, Primary, Runoff, etc) held in _____ and will file all reports and statements with the candidate's principal campaign committee. _____ (Year of election in State) (Full name of principal campaign committee)

(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (FEC FORM 2a)

(c) This committee supports only one candidate _____ (Name of Candidate) but is not an authorized committee.

(d) This committee supports more than one Federal candidate and is not a party committee.

(e) This committee is a _____ committee of the _____ Party. (National, State, county, city) (Democratic, Republican, etc.)

6 Names of affiliated and or connected organizations Mailing address and ZIP code Relationship

See attached roster of local unions. Each of these 'local's does have, or will have, a COPE Committee.

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

Corporation Labor organization Membership organization Trade association Cooperative

Corporation without capital stock Other (please specify)

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

8,604,033,577

ATTACHMENT IX

UNITED STATES HOUSE OF REPRESENTATIVES

Office of the Clerk
Washington, D.C.

1974 NOV - 8 RMW:03

131

REGISTRATION FORM AND STATEMENT OF ORGANIZATION
FOR A
POLITICAL COMMITTEE

New Registration
Registration Amendment
ID =

SEE REVERSE SIDE FOR ADDITIONAL INSTRUCTIONS
ALL QUESTIONS MUST BE ANSWERED FOR NEW REGISTRATIONS

1. Full name of committee: Political Action Council of Educators

Mailing address and ZIP code: 234 Loma Drive, Los Angeles CA 90028

Telephone number: 213-451-2011

2. Affiliated or connected organizations:

Name of affiliated or connected organization	Mailing address and ZIP code	Relationship
United Teachers - Los Angeles	234 Loma Drive, L. A. CA 90028	Membership generally similar

3. Area, scope and jurisdiction of the committee:

- (a) Will this committee operate in more than one State? no
- (b) Will it operate on a statewide basis in one State? no
- (c) Will it primarily support candidates seeking State or local office? yes
- (d) Will it support a candidate for the U.S. House of Representatives in an aggregate amount in excess of \$1,000 during the calendar year? yes

4. If the committee is supporting individual candidates for the U.S. House of Representatives, list each candidate by name, address, office sought, and party affiliation:

Full names of candidates	Mailing address and ZIP code	State and Congressional District	Party
Arlene Mathew	7118 Topanga Canyon Blvd., Canoga Park, CA 91303	20 CD	D
Robert White	12316 E. Firestone Blvd., Norwalk, Calif. 90650	33 CD	

5. List by name, address, office sought, and party affiliation, any candidate for other Federal or public office that this committee is supporting:

Full names of candidates	Mailing address and ZIP code	Office sought	Party
Alan Cranston	6420 Wilshire Blvd., Los Angeles, CA 9004-	Senator Calif.	D

6. If the committee is supporting the entire ticket of a party, give name of party:

Enter all other information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate column when information is continued on separate page(s).

86040583574

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Identify by name, address and position, the committee's custodian of funds and the manner in which the funds are to be handled.

Full name	Mailing address and ZIP code	Committee title or position
Betty Karnette	2805 Chestnut Avenue Long Beach, CA 90806	Treasurer Office telephone No. 483-8611

List by name, address and position of other principal officers of the committee, including the chairman and treasurer if not identified in Question 6 above and members of the finance committee, if any.

Full name	Mailing address and ZIP code	Committee title or position
John Gottfried	3720 Cardiff Ave. Apt. 5 Los Angeles, CA 90034	Chairman

List all banks, other repositories, or other depositories in which the committee deposits for its funds, accounts, rents, safety deposit boxes or maintains funds.

Name of bank, repository, etc.	Mailing address and ZIP code
Security Pacific National Bank	1221 West 5th Street Los Angeles, CA 90017

List all reports required to be filed by this committee with States and local jurisdictions, other than reports required under this Act, the names, addresses, and positions of the recipients of the reports:

Report title	Dates required to be filed	Name and position of recipient	Mailing address and ZIP code
Committee Campaign Statement Form 703	Oct. 29	1) Sec. of State Calif. 2) San Franc. Regis. Voters 3) Los Angeles Regis. Voters	Box 1467, Sac. CA 95807 155 City Hall, S. F. CA 94102 808 N. Spring L. A. CA 90018

All reports, forms, or other documents should be appropriately labeled and attached to this Statement of Organization. Indicate the date of filing and the name of the recipient if not filed on separate pages.

VERIFICATION BY OATH OR AFFIRMATION OF TREASURER

State of California

County of Los Angeles

Betty Karnette

(Full Name of Treasurer of Political Committee)

ss. I, being duly sworn, depose, affirm, and say that the information in this Registration Form and Statement of Organization is complete, true, and correct.

Betty Karnette

(Signature of Treasurer of Political Committee)

Subscribed and sworn to (affirmed) before me this 6th day of November, A.D. 1974

My commission expires March 2, 1975

86040363575



FEDERAL ELECTION COMMISSION

1225 K STREET N.W.
WASHINGTON, D.C. 20463

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May 17, 1978

Dorothy Moser, Treasurer
Political Action Council of Educators
2511 West 3rd. Street
Los Angeles, CA 90057

Dear Ms Moser

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

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

While we recognize the difficulties you may have experienced in filling out the registration forms, we must ask that you supply the Commission with the missing information within (10) days of receipt of this letter. If you have any questions, please do not hesitate to contact Marybeth Tarrent (202-523-4048) our reports analyst assigned to you.

Sincerely,

Orlando B. Potter
Staff Director

Attachment

11

85040363577
7973742536



135

TO: Political Action Council of Educators

DATE: May 17, 1978

I.D. No.: C00023754

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

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

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

Signature omitted incorrect

Question Five. Complete information for: (a) (b) (c) (d) or (e)

Name of affiliated or connected organization(s). (IF NONE, SO STATE.)

Area, scope, and jurisdiction of the committee.

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

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

Name, address, and position of other principal officers of the committee including officers and members of the finance committee.

Statement of existence beyond the current calendar year.

Name(s), location(s) of bank(s), depository(ies).

Other: Please see attached.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Disclosure Division toll free at (800) 424-9530. The local Washington, D.C. telephone number is (202) 523-4048.

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

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REQUEST FOR ADDITIONAL INFORMATION

PAGE 2

POLITICAL ACTION COUNCIL OF EDUCATORS

Section 100.14(b)(c) (2)(1)(B) of the Commission's Regulations states that:

"All political committees set up by a single national or international union and/or its local unions or other subordinate organizations of the national or international are affiliated."

Your committee has identified "United Teachers of Los Angeles" as your connected organization. Section 102.2(b)(11)(B) requires any political committee established by local or other subordinate units to disclose "...the name and address of each political committee established by their parent or superior body, eg. national or international union or organization..." Your committee should, therefore, identify National Education Association Political Action Committee and American Federation of Teachers Committee on Political Education as affiliated committees and the National Education Association and the American Federation of Teachers as the national unions of which your local is a member.

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OCT 6 PM 12:22

October 3, 1978

806735

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

Re: Political Action Council of Educators C00023754

Dear Ms. Tarrant:

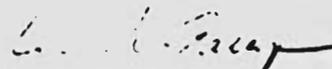
We wish to clarify the relationship that exists between the Political Action Council of Educators (PACE), ID # C00023754, and:

National Education Association (NEA)
American Federation of Teachers (AFT)
National Education Association Political Action Committee (NEA-PAC)
American Federation of Teachers Committee on Political Education (AFT-COPE).

PACE is a separate, segregated political fund established and administered by the United Teachers-Los Angeles (UTLA), PACE's connected organization. It is neither controlled nor affiliated with NEA, AFT, NEA-PAC or AFT COPE. PACE has its own governing structure, is independently organized, and maintains an independent bank account. Decisions concerning contributions and expenditures by PACE are made by PACE itself.

UTLA is neither a chapter, local nor an affiliated organization of either NEA or AFT. UTLA, NEA and AFT are all independently organized, self-governing entities. NEA and AFT local affiliates in Los Angeles are UTP-LA and Local 1021, respectively.

Very truly yours,



Larry K. Gallup
Director of Business Operations

LRG/ej

UTLA

United Teachers—Los Angeles • 2611 West Third Street, Los Angeles, California 90067 • (213) 467-5660
Serving Los Angeles teachers with the California Teachers Association/National Education Association
and the California Federation of Teachers/American Federation of Teachers, AFL-CIO

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

September 21, 1983

Conrad Moser, Treasurer
Political Action Council of Musicians
2511 West 3rd Street
Los Angeles, CA 90057

Identification Number: C00023754

Reference: Statement of Organization

Dear Ms. Moser:

This letter is prompted by the Commission's preliminary review of your Statement of Organization. The review raised questions concerning certain information contained in the Statement. An itemization follows:

-The name of your connected organization (United Teachers of Los Angeles) must be included in the name of your political committee. While committees may use commonly recognized abbreviations on daily communications such as letterheads, committee checks, etc., committee filings (Statements of Organization, disclosure reports and amendments) must reflect the official name of the connected organization, as well as an abbreviation, within its title. (2 U.S.C. 432(e)(5))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0826.

Sincerely,

Pamela Brown
Senior Reports Analyst
Reports Analysis Division

0 1 2 3 4 5 6 7 8 9



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3 OCT 3 11:33

OFFICERS

- JOY BOLKOVITS**
President

- FRANCES HAYWOOD**
N.E.A. Vice President

- MICHAEL BENNETT**
A.F.T. Vice President

- ELSIE AKITA MYERS**
Elementary Vice President

- MARVIN KATZ**
Secondary Vice President

September 27, 1983

Ms. Pamela Brown
Federal Election Commission
13 K Street, N. W.
Washington, D. C. 20463

ROBERTA LEAP
Secretary

Dear Ms. Brown:

GERALD REEDY
Treasurer

Please be advised that Mrs. Moser is no longer the UTLA treasurer. Our new treasurer is : Gerald A. Reedy. Mr. Reedy is in the classroom most of the time, and I handle his political correspondence.

We have made the necessary corrections regarding the amendment to the report that was filed in October of 1982, I trust we made the necessary corrections.

Very truly yours,

Eva Johnson
Eva Johnson
Secretary for:
Political Action Council of Educators



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OFFICERS

JUDY BALKOVITS
President

FRANCES HAYWOOD
N.E.A. Vice President

MICHAEL BARNETT
A.F.T. Vice President

ELSIE AKITA MYERS
Elementary Vice President

MARVIN KATZ
Secondary Vice President

ROBERTA LEAP
Secretary

GERALD REEDY
Treasurer

October 25, 1983

Federal Election Commission
13 K Street
Washington, D. C. 20463

Attn: Pamela Brown

Dear Ms. Brown:

We received your letter dated October 13, 1983, yesterday, regarding our Political Report dated September 27, 1983.

As per your telephone conversation this morning with Eva Johnson of our office, we are notifying you that as of this date the name United Teachers-Los Angeles will appear on all statments filed hereafter.

Very truly yours,

Gerald A. Reedy
Gerald A. Reedy
Treasurer

GAR/ej
opeiu #30
afl-cio,clc

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

142
84 FEB 6 9:27

(Summary Page)

1. Name of Committee (in Full)
**Political Action Council of Educators
(United Teachers-Los Angeles)**

Address (Number and Street)
2511 West 3rd., Street

City, State and ZIP Code
Los Angeles, CA 90057

Check if address is different than previously reported.

2. FEC Identification Number
C00023754

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

4. TYPE OF REPORT (check appropriate boxes)

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

Termination Report

(b) Is this Report an Amendment?
 YES NO

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	10-1-83 Through 12-31-83		
6 (a)	Cash on Hand January 1, 19 373.90		\$ 373.90
	(b) Cash on Hand at Beginning of Reporting Period	\$ 1,817.82	
	(c) Total Receipts (from Line 1B)	\$ 8,794.64	\$ 29,051.24
	(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 10,612.46	\$ 29,425.14
7	Total Disbursements (from Line 2B)	\$ 1,910.60	\$ 20,723.28
8	Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 8,701.86	\$ 8,701.86
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-527-4088

Gerald A. Reedy
Type or Print Name of Treasurer

Gerald A. Reedy
SIGNATURE OF TREASURER

1-30-84
Date

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

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

--	--	--	--	--	--	--	--	--	--



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

150

Joan Ruby, Esquire
Assistant General Counsel
Amalgamated Clothing and Textile Workers Union
15 Union Square
New York, New York 10003

RE: MUR 1716
Amalgamated Clothing and
Textile Workers Union
Political Action Committee and
George Solomons, Treasurer

Dear Ms. Ruby:

The Federal Election Commission notified your client on June 6, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your client at that time. We acknowledge receipt of your client's explanation of this matter which was dated July 9, 1984.

Upon review of the allegations contained in the complaint and information supplied by your client, the Commission, on [redacted], 1984, determined that there is no reason to believe that the Amalgamated Clothing and Textile Workers Union Political Action Committee and George Solomons, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act.

Also, the Commission, on [redacted], 1984, determined that the Amalgamated Clothing and Textile Workers Union Political Action Committee and Goerge Solomons, as treasurer, violated 11 C.F.R. § 104.14(d) for improper reporting of contributions. However, after considering the circumstances in this matter, the Commission has determined to take no further action and close its file. Accordingly, the Commission closed its file in this matter as it pertains to your client. This matter will become a part of

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Joan Ruby, Esquire
Page 2

the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

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

Sincerely,

Enclosure
General Counsel's Report

8 6 0 4 0 3 6 3 5 8 7



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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Max Zimny, Esquire
General Counsel
International Ladies' Garment Workers' Union
1710 Broadway
New York, New York 10019

RE: MUR 1716
International Ladies' Garment
Workers' Union Campaign
Committee and Lawrence Dock,
Treasurer

Dear Mr. Zimny:

The Federal Election Commission notified your client on June 6, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your client at that time. We acknowledge receipt of your client's explanation of this matter which was dated June 22, 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 International Ladies' Garment Workers' Union Campaign Committee and Lawrence Dock, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

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

8604050588

Max Zimny, Esquire
Page 2

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

Sincerely,

Enclosures
Procedures
General Counsel's Report

86040503589



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

154

Roger D. Loomis, Jr., Esquire
Reavis & McGrath
Sixth Floor - Broadway Plaza
700 South Flower Street
Los Angeles, California 90017

RE: MUR 1716
Brown for United States Senate
Committee and Burt Pines,
Treasurer

Dear Mr. Loomis:

The Federal Election Commission notified your client on June 6, 1984, of a complaint alleging violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). Copies of the complaint were forwarded to your client at that time. We acknowledge receipt of your client's explanation of this matter received July 24, 1984.

Upon review of the allegations contained in the complaint and information supplied by all respondents, the Commission, on , 1984, determined that there is reason to believe that the Brown for United States Senate Committee and Burt Pines, as treasurer, ("Brown Committee") violated 2 U.S.C. § 441a(f), by accepting excessive contributions from the International Ladies' Garment Workers' Union Campaign Committee ("ILGWUCC").

Also, the Commission found reason to believe that the Brown Committee violated 2 U.S.C. § 441a(f), by accepting excessive contributions from the American Federation of Teachers Committee on Political Education ("AFT-COPE") and the Political Action Council of Educators (United Teachers - Los Angeles) ("PACE"), but determined to take no further action with regard to this violation.

20040300590

155

Roger D. Loomis, Jr., Esquire
Page 2

Finally, the Commission found no reason to believe that the Brown Committee violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from the Amalgamated Clothing and Textile Workers Union PAC ("ACTWU-PAC").

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause; however, in the absence of any information which demonstrates that no further action should be taken against your clients, the Office of General 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. §§ 438g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosure
Procedures
General Counsel's Report

86040563591



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 4, 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

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

SUBJECT: MUR 1716: AMERICAN FEDERATION OF TEACHERS, AFL-CIO

Please review the attached Request for Additional Information which is to be sent to the American Federation of Teachers AFL-CIO for the 1984 30 Day Post-General Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 12:00 noon on Wednesday, March 6, 1985. Thank you.

COMMENTS:

Attachment



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Robert G. Porter, Treasurer
American Federation of Teachers,
AFL-CIO
11 Dupont Circle, NW
Washington, DC 20036

Identification Number: C70001029

Reference: 30 Day Post-General Report (10/18/84-11/26/84)

Dear Mr. Porter:

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

-Please amend your report by providing class communicated with on FEC Form 7.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Paul Kolesa
Reports Analyst
Reports Analysis Division

86040703593



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 17, 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

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

SUBJECT: MUR 1716: AMERICAN FEDERATION OF TEACHERS
COMMITTEE ON POLITICAL EDUCATION (AFT COPE)

Please review the attached Request for Additional Information which is to be sent to the AFT COPE for the 1984 30 Day Post-General Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 10:00 a.m. on Tuesday, January 22, 1985. Thank you.

COMMENTS:

Attachment

86040706594



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Robert G. Porter, Treasurer
American Federation of Teachers
Committee on Political
Education
555 New Jersey Avenue, NW
Washington, DC 20001

Identification Number: C00028860

Reference: 30 Day Post-General Report (10/18/84-11/26/84)

Dear Mr. Porter:

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

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

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Alva E. Smith
Reports Analyst
Reports Analysis Division

3604030595



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 14, 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

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

SUBJECT: MUR 1716: AMALGAMATED CLOTHING AND TEXTILE
WORKERS UNION PAC (ACTWU PAC)

Please review the attached Request for Additional Information which is to be sent to the ACTWU PAC for the 1984 30 Day Post-General Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 12:00 noon on Wednesday, January 16, 1985. Thank you.

COMMENTS:

Attachment



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

Jacob Sheinkman, Treasurer
Amalgamated Clothing & Textile
Workers Union Political
Action Committee
15 Union Square
New York, NY 10003

Identification Number: C00005728

Reference: 30 Day Post-General Report (10/18/84-11/26/84)

Dear Mr. Sheinkman:

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

-Please amend Schedule A supporting Line 11(c) by providing the aggregate year-to-date amount for each contribution received from a political committee. 11 CFR 104.3(a)(4)(ii) and (iii)(B).

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Alva E. Smith
Reports Analyst
Reports Analysis Division

86040593597



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 14, 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

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

SUBJECT: MUR 1716: INTERNATIONAL LADIES GARMENT WORKERS
UNION CAMPAIGN COMMITTEE (ILGWUC)

Please review the attached Informational Notice which is to be sent to the ILGWUC for the 1984 30 Day Post-General Report. Any comments which you may have should be forwarded to RAD by 12:00 noon on Wednesday, January 16, 1985. Thank you.

COMMENTS:

Attachment

8604053593

OK
1/15/85



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

January 14, 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

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

SUBJECT: MUR 1716: AMALGAMATED CLOTHING AND TEXTILE
WORKERS UNION PAC (ACTWU PAC)

Please review the attached Request for Additional Information which is to be sent to the ACTWU PAC for the 1984 30 Day Post-General Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 12:00 noon on Wednesday, January 16, 1985. Thank you.

COMMENTS:

OK
GD
11/15/85

Attachment

86040703599



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 14, 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

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

SUBJECT: MUR 1716: INTERNATIONAL LADIES GARMENT WORKERS
UNION CAMPAIGN COMMITTEE (ILGWUC)

Please review the attached Informational Notice which is to be sent to the ILGWUC for the 1984 30 Day Post-General Report. Any comments which you may have should be forwarded to RAD by 12:00 noon on Wednesday, January 16, 1985. Thank you.

COMMENTS:

Attachment

9604076600



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-5

Jay Mazur, Treasurer
International Ladies Garment
Workers Union Campaign
Committee
1710 Broadway
New York, NY 10019

Identification Number: C00004861

Reference: 30 Day Post-General Report (10/18/84-11/26/84)

Dear Mr. Mazur:

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

-Schedule B supporting Line 19 of your report discloses a disbursement in the amount of \$2,325 for "Communication with Members". Please provide the following information with regard to this disbursement: the type of communication (direct mail, telephone, telegram or other); the identification of the candidates, office sought, district and state and whether the communication was in support of or in opposition to those candidates; the election designation of the communication (primary or general); and the cost of the communication per candidate.

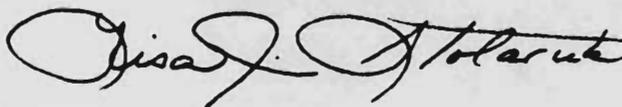
-Your report discloses in-kind contributions made on behalf of Federal candidates. The original payments for the goods and services have been itemized as operating expenditures and included in the total for Line 19 of the Detailed Summary Page. In addition, the attribution to each Federal candidate has been noted as a memo entry on supporting Schedule B for Line 21 (Contributions to Federal Candidates and Other Political Committees).

For future reporting, it is recommended that the amount of such activity be subtracted from Line 19 and added to Line 21 of the Detailed Summary Page. This method of reporting would clarify the public record to the extent that the total amount of contributions to Federal candidates (including in-kind contributions) would be reflected on Line 21 of the Detailed Summary Page.

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Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Lisa J. Stolaruk
Senior Reports Analyst
Reports Analysis Division

8604033602



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 3, 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

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

SUBJECT: MUR 1716: AMERICAN FEDERATION OF GOVERNMENT
EMPLOYEES POLITICAL ACTION COMMITTEE

Please review the attached Informational Notice which is to be sent to the American Federation of Government Employees Political Action Committee for the 1985 February Monthly and March Monthly Reports. Any comments which you may have should be forwarded to RAD by 4:00 p.m. on Thursday, December 6, 1985. Thank you.

COMMENTS:

Attachment

86040383603



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

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

Identification Number: C00009936

Reference: February Monthly (1/1/85-1/31/85) and March Monthly
(2/1/85-2/28/85) Reports

Dear Mr. Lynch:

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

-For future reporting, please be advised that contributions to Federal candidates and political committees should be itemized on a separate Schedule B supporting Line 21 of the Detailed Summary Page. Contributions to non-Federal candidates and committees should be itemized on Schedule B supporting Line 27.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

A handwritten signature in cursive script that reads "Michael D. Butterfield".

Michael D. Butterfield
Reports Analyst
Reports Analysis Division

96040500604



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

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

SUBJECT: MUR 1716 - INTERNATIONAL LADIES GARMENT WORKERS
UNION CAMPAIGN COMMITTEE (ILGWUCC)

Please review the attached Request for Additional Information which is to be sent to the ILGWUCC for the 1984 October Monthly Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 5:00 p.m. on Monday, November 26, 1984. Thank you.

COMMENTS:

OK.
GD
11/23/84

Attachment

86040703605



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RQ-2

Jay Mazur, Treasurer
International Ladies Garment
Workers Union Campaign
Committee
1710 Broadway
New York, NY 10019

Identification Number: C00004861

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

Dear Mr. Mazur:

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

-All reports filed with the Commission must be legible in order that they may be microfilmed and placed on the public record. Please resubmit a legible report, as the original is unacceptable. Your filing will not be considered complete until a legible report is submitted. 11 CFR 104.5

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Lisa Stolaruk
Senior Reports Analyst
Reports Analysis Division

96090383605



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 17, 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

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

SUBJECT: MUR 1716: AMERICAN FEDERATION OF TEACHERS
COMMITTEE ON POLITICAL EDUCATION (AFT COPE)

Please review the attached Request for Additional Information which is to be sent to the AFT COPE for the 1984 30 Day Post-General Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 10:00 a.m. on Tuesday, January 22, 1985. Thank you.

COMMENTS:

OK.
GD
1/17/85

Attachment

86040503607



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 4, 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

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

SUBJECT: MUR 1716: AMERICAN FEDERATION OF TEACHERS, AFL-CIO

Please review the attached Request for Additional Information which is to be sent to the American Federation of Teachers AFL-CIO for the 1984 30 Day Post-General Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 12:00 noon on Wednesday, March 6, 1985. Thank you.

COMMENTS:

OK
SW
3/4/85

Attachment

86040583608



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Robert G. Porter, Treasurer
American Federation of Teachers,
AFL-CIO
11 Dupont Circle, NW
Washington, DC 20036

Identification Number: C70001029

Reference: 30 Day Post-General Report (10/18/84-11/26/84)

Dear Mr. Porter:

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

-Please amend your report by providing class communicated with on FEC Form 7.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

A handwritten signature in cursive script that reads "Paul Kolesa".

Paul Kolesa
Reports Analyst
Reports Analysis Division

86040583609



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 12, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

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

SUBJECT: MUR 1716: INTERNATIONAL LADIES GARMENT WORKERS
UNION CAMPAIGN COMMITTEE (ILGWUCC)

Please review the attached Request for Additional Information which is to be sent to the ILGWUCC for the 1984 12 Day Pre-General Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 12:00 noon on Friday, December 14, 1984. Thank you.

COMMENTS:

OK
12/12/84

Attachment

86040703610



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RQ-2

Jay Mazur, Treasurer
International Ladies Garment
Workers Union Campaign Committee
1710 Broadway
New York, NY 10019

Identification Number: C00004861

Reference: 12 Day Pre-General Report (10/1/84-10/17/84)

Dear Mr. Mazur:

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

-Schedule B supporting Line 19 of your report discloses a disbursement in the amount of \$5,535.56 for "Communications with Members". Please provide the following information with regard to this disbursement: the type of communication (direct mail, telephone, telegram or other); the identification of the candidates, office sought, district and state and whether the communication was in support of or in opposition to those candidates; the election designation of the communication (primary or general); and the cost of the communication per candidate.

-Line 21 of the Detailed Summary Page of your report discloses a total of \$107,810 in contributions to Federal candidates. The sum of the entries itemized on Schedule B, however, indicates the total to be \$107,310. Please amend your report to clarify the discrepancy.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Lisa Stolaruk
Senior Reports Analyst
Reports Analysis Division

86040303611



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 12, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

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

SUBJECT: MUR 1716: INTERNATIONAL LADIES GARMENT WORKERS
UNION CAMPAIGN COMMITTEE (ILGWUCC)

Please review the attached Request for Additional Information which is to be sent to the ILGWUCC for the 1984 12 Day Pre-General Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 12:00 noon on Friday, December 14, 1984. Thank you.

COMMENTS:

Attachment

86040303612



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Jay Mazur, Treasurer
International Ladies Garment
Workers Union Campaign Committee
1710 Broadway
New York, NY 10019

Identification Number: C00004861

Reference: 12 Day Pre-General Report (10/1/84-10/17/84)

Dear Mr. Mazur:

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

-Schedule B supporting Line 19 of your report discloses a disbursement in the amount of \$5,535.56 for "Communications with Members". Please provide the following information with regard to this disbursement: the type of communication (direct mail, telephone, telegram or other); the identification of the candidates, office sought, district and state and whether the communication was in support of or in opposition to those candidates; the election designation of the communication (primary or general); and the cost of the communication per candidate.

-Line 21 of the Detailed Summary Page of your report discloses a total of \$107,810 in contributions to Federal candidates. The sum of the entries itemized on Schedule B, however, indicates the total to be \$107,310. Please amend your report to clarify the discrepancy.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Lisa Stolaruk
Senior Reports Analyst
Reports Analysis Division

86040303613



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 14, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

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

SUBJECT: MUR 1716: AMERICAN FEDERATION OF TEACHERS
COMMITTEE ON POLITICAL EDUCATION (AFT COPE)

Please review the attached Request for Additional Information which is to be sent to the AFT COPE for the 1984 October Quarterly Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 12:00 noon on Tuesday, December 18, 1984. Thank you.

COMMENTS:

OK
GD
12/18/84

Attachment

8604033614



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 14, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

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

SUBJECT: MUR 1716: AMERICAN FEDERATION OF TEACHERS
COMMITTEE ON POLITICAL EDUCATION (AFT COPE)

Please review the attached Request for Additional Information which is to be sent to the AFT COPE for the 1984 October Quarterly Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 12:00 noon on Tuesday, December 18, 1984. Thank you.

COMMENTS:

Attachment

85040383615



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

BQ-2

Robert G. Porter, Treasurer
American Federation of Teachers
Committee on Political Education
555 New Jersey Avenue, NW
Washington, DC 20001

Identification Number: C00028860

Reference: October Quarterly Report (7/1/84-9/30/84)

Dear Mr. Porter:

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

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

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Alva Smith
Reports Analyst
Reports Analysis Division

85040533616



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 14, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

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

SUBJECT: MUR 1716: AMALGAMATED CLOTHING AND TEXTILE WORKERS
UNION (ACTWU)

Please review the attached Request for Additional Information which is to be sent to the ACTWU for the 1984 12 Day Pre-General Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 12:00 noon on Tuesday, December 18, 1984. Thank you.

COMMENTS:

OK

AW

12/18/84

Attachment

86040503617



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 14, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

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

SUBJECT: MUR 1716: AMALGAMATED CLOTHING AND TEXTILE WORKERS
UNION (ACTWU)

Please review the attached Request for Additional Information which is to be sent to the ACTWU for the 1984 12 Day Pre-General Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 12:00 noon on Tuesday, December 18, 1984. Thank you.

COMMENTS:

Attachment

85040703618



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Elizabeth M. Smith, Treasurer
Amalgamated Clothing and Textile
Workers Union
15 Union Square
New York, NY 10003

Identification Number: C70000732

Reference: 12 Day Pre-General Report (10/1/84-10/17/84)

Dear Ms. Smith:

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

-Please provide the class communicated with on FEC Form 7.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

J. Hunter Bryan
Reports Analyst
Reports Analysis Division

85040363619



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 30, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

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

SUBJECT: MUR 1716: AMERICAN FEDERATION OF TEACHERS
COMMITTEE ON POLITICAL EDUCATION (AFT COPE)

Please review the attached Informational Notice which is to be sent to the AFT COPE for the October Quarterly Report. Any comments which you may have should be forwarded to RAD by 12:00 noon on Tuesday, December 4, 1984. Thank you.

COMMENTS:

OK
GD
11/30/84

Attachment

86040383620



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RQ-5

Robert G. Porter, Treasurer
American Federation of Teachers
Committee on Political Education
555 New Jersey Avenue, NW
Washington, DC 20001

Identification Number: C00028860

Reference: October Quarterly Report (7/1/84-9/30/84)

Dear Mr. Porter:

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

-For future reporting, please be advised that contributions to Federal candidates and political committees should be itemized on a separate Schedule B supporting Line 21 of the Detailed Summary Page. Contributions to non-Federal candidates and committees should be itemized on Schedule B supporting Line 27.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Alva E. Smith
Reports Analyst
Reports Analysis Division

85040583621



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 30, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

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

SUBJECT: MUR 1716: AMERICAN FEDERATION OF TEACHERS
COMMITTEE ON POLITICAL EDUCATION (AFT COPE)

Please review the attached Informational Notice which is to be sent to the AFT COPE for the October Quarterly Report. Any comments which you may have should be forwarded to RAD by 12:00 noon on Tuesday, December 4, 1984. Thank you.

COMMENTS:

Attachment

36040563622



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

Robert G. Porter, Treasurer
American Federation of Teachers
Committee on Political Education
555 New Jersey Avenue, NW
Washington, DC 20001

Identification Number: C00028860

Reference: October Quarterly Report (7/1/84-9/30/84)

Dear Mr. Porter:

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

-For future reporting, please be advised that contributions to Federal candidates and political committees should be itemized on a separate Schedule B supporting Line 21 of the Detailed Summary Page. Contributions to non-Federal candidates and committees should be itemized on Schedule B supporting Line 27.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Alva E. Smith
Reports Analyst
Reports Analysis Division

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 25, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: ANDREW MAIKOVICH

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

SUBJECT: MUR 1716 - INTERNATIONAL LADIES GARMENT WORKERS
UNION CAMPAIGN COMMITTEE (ILGWUCC)

Please review the attached Request for Additional Information which is to be sent to the ILGWUCC for the 1984 August Monthly Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 12:00 noon on September 27, 1984. Thank you.

COMMENTS:

Attachment

860405624



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Jay Mazur, Treasurer
International Ladies Garment
Workers Union Campaign
Committee
1710 Broadway
New York, NY 10019

Identification Number: C00004861

Reference: August Monthly Report (7/1/84-7/31/84)

Dear Mr. Mazur:

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

-Please identify the name and address of the payee for the in-kind contribution(s) disclosed on Schedule B for Line 21.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Lisa Stolaruk
Senior Reports Analyst
Reports Analysis Division

85040503625



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 21, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

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

SUBJECT: MUR 1716 - INTERNATIONAL LADIES GARMENT WORKERS
UNION CAMPAIGN COMMITTEE (ILGWUCC)

Please review the attached Request for Additional Information which is to be sent to the ILGWUCC for the 1984 October Monthly Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 5:00 p.m. on Monday, November 26, 1984. Thank you.

COMMENTS:

Attachment

850403626



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

Jay Mazur, Treasurer
International Ladies Garment
Workers Union Campaign
Committee
1710 Broadway
New York, NY 10019

Identification Number: C00004861

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

Dear Mr. Mazur:

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

-All reports filed with the Commission must be legible in order that they may be microfilmed and placed on the public record. Please resubmit a legible report, as the original is unacceptable. Your filing will not be considered complete until a legible report is submitted. 11 CFR 104.5

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Lisa Stolaruk
Senior Reports Analyst
Reports Analysis Division

86040586627



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 19, 1984

Roger D. Loomis, Jr.
Reavis & McGrath
Sixth Floor - Broadway Plaza
700 South Flower Street
Los Angeles, California 90017

Re: MUR 1716

Dear Mr. Loomis:

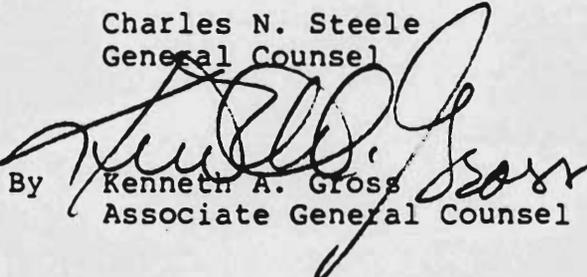
On June 6, 1984, you were notified that the Federal Election Commission received a complaint from James Edward Antosh alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. You were also given a copy of the complaint and afforded an opportunity to respond.

On August 17, 1984, the Commission received additional correspondence from the complainant pertaining to the allegations in the complaint. We are enclosing a copy of this correspondence for your information.

If you have any questions, please contact Andrew Maikovich, 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

86040533628



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 19, 1984

William C. Oldaker
Epstein, Becker, Borsody & Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 20036

Re: MUR 1716

Dear Mr. Oldaker:

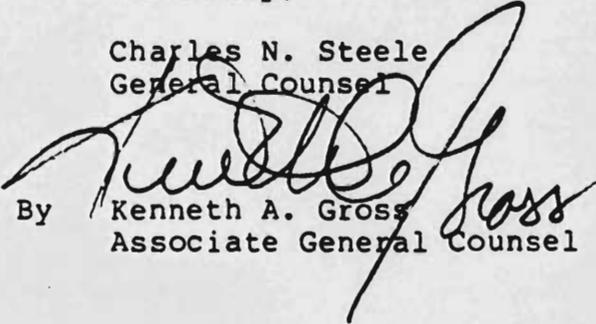
On June 6, 1984, you were notified that the Federal Election Commission received a complaint from James Edward Antosh alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. You were also given a copy of the complaint and afforded an opportunity to respond.

On August 17, 1984, the Commission received additional correspondence from the complainant pertaining to the allegations in the complaint. We are enclosing a copy of this correspondence for your information.

If you have any questions, please contact Andrew Maikovich, 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

86040303629



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 19, 1984

Leo Geffner
Geffner & Satzman
3055 Wilshire Boulevard, Suite 900
Los Angeles, California 90010

Re: MUR 1716

Dear Mr. Geffner:

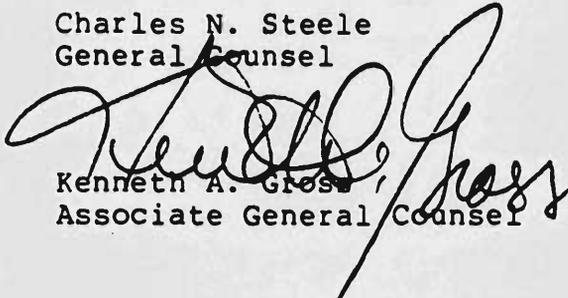
On June 6, 1984, you were notified that the Federal Election Commission received a complaint from James Edward Antosh alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. You were also given a copy of the complaint and afforded an opportunity to respond.

On August 17, 1984, the Commission received additional correspondence from the complainant pertaining to the allegations in the complaint. We are enclosing a copy of this correspondence for your information.

If you have any questions, please contact Andrew Maikovich, 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

86040563630



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 19, 1984

Joan Ruby
Assistant General Counsel
Amalgamated Clothing and Textile Workers Union
15 Union Square
New York, New York 10003

Re: MUR 1716

Dear Ms. Ruby:

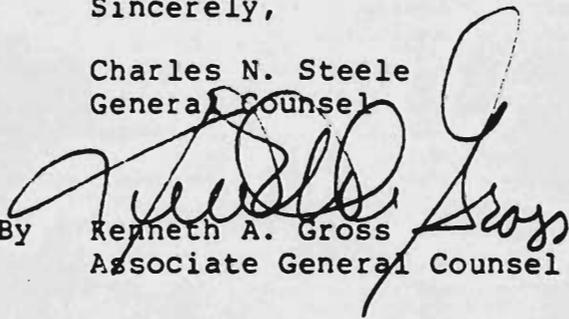
On June 6, 1984, you were notified that the Federal Election Commission received a complaint from James Edward Antosh alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. You were also given a copy of the complaint and afforded an opportunity to respond.

On August 17, 1984, the Commission received additional correspondence from the complainant pertaining to the allegations in the complaint. We are enclosing a copy of this correspondence for your information.

If you have any questions, please contact Andrew Maikovich, 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

860403631



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 19, 1984

Max Zimny
General Counsel
International Ladies' Garment Workers' Union
1710 Broadway
New York, New York 10019

Re: MUR 1716

Dear Mr. Zimny:

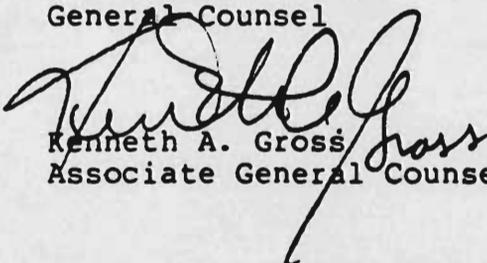
On June 6, 1984, you were notified that the Federal Election Commission received a complaint from James Edward Antosh alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. You were also given a copy of the complaint and afforded an opportunity to respond.

On August 17, 1984, the Commission received additional correspondence from the complainant pertaining to the allegations in the complaint. We are enclosing a copy of this correspondence for your information.

If you have any questions, please contact Andrew Maikovich, 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

86040383632

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

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

v.)

MUR No. 1716

Edmund G. Brown, Jr.; Brown for)
U.S. Senate; American Federation)
of Teachers, Committee on)
Political Education and its)
affiliated separate segregated)
fund, Political Action Council)
of Educators; Amalgamated)
Clothing and Textile Workers)
Union Political Action Committee;)
International Ladies Garment)
Workers Union Campaign Committee,)
and all the Committees')
treasurers,)
Respondents.)

COMPLAINANT'S RESPONSE
TO REPLY OF EDMUND G.
BROWN, JR., BROWN FOR
U.S. SENATE COMMITTEE,
JULES GLAZER AND BURT
PINES

86040583633

I. INTRODUCTION

On July 30, 1984, Complainant received a copy of the Reply of Edmund G. Brown, Jr., Brown for U.S. Senate Committee ("Committee" or "Respondent"), Burt Pines and Jules Glazer.¹ The Complainant takes exception to the Respondent's Reply and states the following:

1) The American Federation of Teachers - Committee on Political Education ("AFT-COPE") and Political Action Council of Educators ("PACE") are affiliated organizations within the meaning of 2 U.S.C. §441a(a)(5).

2) The Committee Treasurer failed to accurately report the \$1,000.00 contribution made by PACE on April 5, 1982.

3) According to the reports filed with the Federal Election Commission ("Commission"), the Committee received excessive contributions from the Amalgamated Clothing and Textile Workers Political Action Committee ("ACTWU-PAC") for the 1982 federal primary election.

4) The Committee received excessive contributions from the International Ladies Garment Workers Union Campaign Committee ("ILGWUCC") for the 1982 federal general election.

¹The Complainant did not receive a copy of the briefs filed by the other respondents. "Respondent" herein refers only to Edmund G. Brown, Jr., Brown for U.S. Senate Committee, Burt Pines and Jules Glazer.

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II. DISCUSSION

A. The American Federation of Teachers-Committee on Political Education ("AFT-COPE") and Political Action Council of Educators ("PACE") are Affiliated Organizations.

The Respondent states that AFT-COPE and PACE have taken the position before the Commission that they are not affiliated organizations. It is Complainant's belief that both AFT-COPE and PACE are separate segregated funds of the American Federation of Teachers ("AFT"), and that, therefore, contributions made by AFT-COPE and PACE 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).

PACE designated United Teachers - Los Angeles ("UTLA") as an affiliated or connected organization on its Statement of Organization. (See Exhibit A). UTLA has not filed a Statement of Organization with the Commission. However, in a letter dated October 25, 1983, the treasurer of PACE notified the Commission that the name United Teacher - Los Angeles will appear on all of its future statements. (See Exhibit B). The UTLA letterhead lists its officers which includes AFT Vice-President Michael Bennett in his official capacity. Since AFT-COPE and PACE are each affiliated with AFT, contributions made by AFT-COPE and PACE are treated as contributions from a single committee.

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B. The Treasurer of the Brown for U.S. Senate Committee Failed to Accurately Report the \$1,000 Contribution Made By PACE on April 5, 1982.

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The Respondent states that the Committee treasurer clearly designated the \$1,000.00 contribution made by PACE on April 5, 1982, and received by the Committee on April 15, 1982, as for the primary election. The contribution in question is designated for the primary election on the copy of the Committee's report which was submitted with the Respondent's Reply. (See Exhibit C and Exhibit F of Respondent's Reply). However, the contribution is not designated for either election on the report which was filed with the Commission (See Exhibit D and Affidavit of Krista L. Peterson, attached hereto as Exhibit E). Therefore, the treasurer of the Committee violated 11 C.F.R. §104.14(d) by failing to accurately report the \$1,000.00 contribution.

C. The Committee Treasurer Properly Reported the \$4,425.00 Contribution Made By AFT-COPE on August 12, 1982.

The Complaint states that AFT-COPE made a \$5,000.00 contribution and a \$4,425.00 contribution on May 26, 1982 which were designated as contributions for the primary election. After reexamination of the reports, it appears that AFT-COPE amended its original report to redesignate the \$5,000.00 contribution as \$4,425.00 for the primary election and \$575.00 for the general election.

Complainant believed that AFT-COPE made two separate contributions on May 26, 1982 rather than one contribution which was amended. The Complainant believed that the \$5,000.00 contribution was received on June 5, 1982 and that the \$4,425.00 contribution for the primary election was received by the Committee on August 18, 1982. However, it appears that the Respondent is correct in stating that the \$4,425.00 contribution which was received on August 18, 1982, was made on August 12, 1982 and designated by AFT-COPE as a contribution for the general election. Therefore, it is now Complainant's belief that the \$4,425.00 contribution was properly reported by the Committee's treasurer as a contribution for the general election.

D. According to the Reports Filed With the Commission, the Committee Received Excessive Contributions from the Amalgamated Clothing and Textile Workers Political Action Committee ("ACTWU-PAC").

The Respondent states that it did not receive excessive contributions from ACTWU-PAC for the 1982 primary election. The Committee received a \$5,000.00 contribution on May 27, 1982 and a \$1,000.00 contribution on November 4, 1982 which were reported by ACTWU-PAC as contributions for the primary election. The Respondent alleges that the \$1,000.00 contribution was not designated for a particular election and submits a copy of the check (See Exhibit F and Respondent's Exhibit G). The Respondent

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further states that since the contribution was not designated in writing as for a particular election and was made after the primary election, it is considered a contribution for the general election in accordance with 11 C.F.R. §110.1(a)(2)(ii)(B).

Complainant has relied on the public records which indicate that a violation of the Federal Election Campaign Act ("Act") has occurred. ACTWU-PAC reported the \$1,000.00 contribution as for the primary election on its FEC Form 3X, Schedule B. The Respondent states that this was a clerical error and that ACTWU-PAC has since amended its report. The amendment was filed on July 11, 1984, after the Complaint was filed. (See Exhibit G).

Since public citizens are not privy to the correspondence between political action committees and candidate committees which accompany contributions, they must be able to rely on the public records. 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 or statement contained in it." This provision is rendered meaningless if a treasurer of a political committee is relieved of all liability by merely stating that a violation which has appeared in the public records for two years is the result of a "clerical error." To allow a treasurer to amend reports to allegedly comply with the Act post hoc in response to a complaint, without imposing any sanctions, is to vitiate the purpose of the Act.

05040306638

E. The Committee Received Excessive Contributions from the International Ladies Garment Workers Union Campaign Committee ("ILGWUCC") for the 1982 Federal General Election.

The Respondent admits that it received a total of \$6,000.00 from the ILGWUCC for the 1982 federal general election. However, the Committee argues that the receipt of the excess contribution of \$1,000.00 should not constitute a violation of 2 U.S.C. §441a(f) because it was the result of a clerical error and because the \$1,000.00 has subsequently been refunded. Neither of these responses is satisfactory.

First, the Committee states that the \$4,000.00 contribution was recorded as a contribution from the "International Ladies Garment Workers Union." The two additional contributions were reported as contributions from the "ILGWU." The Respondent alleges that because of this clerical error, the Committee did not know that the contributions were from the same organization. It is difficult to believe that the treasurer used "best efforts" when he accepted contributions from an organization with an abbreviated name without attempting to discover what the abbreviation stood for.

Furthermore, the refund of the contribution almost two years after it was accepted is not a sufficient remedy. The Complainant recommends that the Respondent also be required to return the interest on the \$1,000.00 and that a civil penalty be levied against the Respondent for violating the Act. Unless

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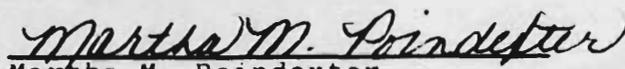
some sanction is imposed, candidate committees can accept excessive contributions with impunity and later return the money without interest only if a complaint is filed. This result would permit the Committee to benefit from its own violation.

III. CONCLUSION

As documented above, the Respondent has violated the Federal Election Campaign Act. Complainant requests that Respondents be required to return the accepted excess contributions with interest and that civil sanctions be imposed on the Respondent.



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

August 10, 1984

85040503640

SECRET

HAND DELIVERED

ALL QUESTIONS MUST BE REFERENCED FOR NEW REGISTRATIONS

1. Full name of committee: Los Angeles Council of Educators
Mailing address and ZIP code: 234 Loma Vista, Los Angeles, CA 90026
Telephone number: 213-483-0311

2. Affiliated or connected organizations:

Name of affiliated or connected organization	Mailing address and ZIP code	Relationship
United Teachers-Los Angeles	234 Loma Vista, L. A. CA 90026	Membership generally similar

- (a) Will this committee conduct its operations on State? NO
- (b) Will it operate out of a Federal building on State? NO
- (c) Will it primarily support candidates for State or local office? NO
- (d) Will it support a candidate for the U.S. House of Representatives in an aggregate amount in excess of \$1,000 during the calendar year?

4. (a) If the committee is supporting individual candidates for the U.S. House of Representatives, list each candidate by name, address, office sought, and party affiliation:

Full names of candidates	Mailing address and ZIP code	State and Congressional District	Party
Arturo Hathorn	7110 ... Blvd., ... 9003	29 CD	D
Robert White	1234 ... Blvd., ... 9003	33 CD	D

(b) List by name, address, office sought, and party affiliation, any candidates for other Federal or State office that this committee is supporting:

Full names of candidates	Mailing address and ZIP code	Office sought	Party
Alan Cranston	... Los Angeles, Calif.	Senator Calif.	D

5. If this committee is supporting the ...

7 8 6 0 0 2 0 3 5 3 4 2

STUBS

ANDY CALDWELL
Fisher

FRANK WILSON
R.A. VICKERS

WILLIAM GIBBY
A.F.V. VICKERS

CLAUDE ANDERSON
Company Vice-President

WALTER GALT
Company Vice-President

WALTER LEE
Secretary

WALTER HENRY
Secretary

October 25, 1958

Federal Election Commission
13 E Street
Washington, D. C. 20540

Attn: Paula Green

Dear Ms. Green:

We received your letter dated October 14, 1958, regarding our Political Report dated August 2, 1958.

As per your telephone conversation this date with Mr. Johnson of our office, we are verifying the accuracy of this data the same being subject to the Federal Election Commission as all statements filed herewith.

Very truly yours,

Gerald A. Reedy, Jr.

Gerald A. Reedy
Treasurer

GAR/ej
opals #30
afi-cio,cic

SCHEDULE A

ITEMIZED RECEIPTS

EXHIBIT C

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)			
Brown for U.S. Senate			
A. Full Name, Mailing Address and ZIP Code Political Action Council Of Educators 2511 W 3rd Street Los Angeles, CA 90057	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	I.D.# C00023754	4/15/82	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
B. Full Name, Mailing Address and ZIP Code ROLMPAC 4900 Old Ironsides Dr. Santa Clara, CA 95050	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	I.D.# C00118224	4/15/82	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
C. Full Name, Mailing Address and ZIP Code Roos for Assembly Committee 6255 Sunset Bl. Ste. 2000 Los Angeles, Ca. 90028	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	I.D.# C00133686	5/11/82	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
D. Full Name, Mailing Address and ZIP Code SEIU-COPE Fund PAC 2020 K. Street, N.W. Washington, D.C. 20006	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	I.D.# C00004036	5/1/82	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
E. Full Name, Mailing Address and ZIP Code UAPAC-United Assoc. of Journeyman & Apprentices of Plumbing & Pipe-Fitting Industry 901 Massachusetts Ave. N.W. Washington, D.C. 20006	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	I.D.#	5/5/82	
Receipt For: <input checked="" 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 UAW V CAP 800 E. Jefferson Detroit, Mi. 48214	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	I.D.# C00002840	5/17/82	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
G. Full Name, Mailing Address and ZIP Code United Food & Commercial Workers International Union, ABC 1775 K Street, N.W. Washington D.C. 20006	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	I.D.# C00002766	5/11/82	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
SUBTOTAL of Receipts This Page (optional)			14,750.00
TOTAL This Period (last page this line number only)			

SCHEDULE A

ITEMIZED RECEIPTS

Page 2 of 4
 LINE NUMBER 42
 (Use separate schedule 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)

Brown for U.S. Senate

A. Full Name, Mailing Address and ZIP Code

Political Action Council of Educators
 2511 W 3rd Street
 Los Angeles, CA 90057

Name of Employer

I.D.# C00023754

Date (month, day, year)

4/15/82

Amount of Each Receipt This Period
 \$1000.

Occupation

Receipt For Primary General
 Other (specify):

Aggregate Year-to-Date-\$

B. Full Name, Mailing Address and ZIP Code

ROLMPAC
 4900 Old Ironsides Dr.
 Santa Clara, CA 95050

Name of Employer

I.D.# C00118224

Date (month, day, year)

4/15/82

Amount of Each Receipt This Period
 \$150.

Occupation

Receipt For Primary General
 Other (specify):

Aggregate Year-to-Date-\$

C. Full Name, Mailing Address and ZIP Code

Roos for Assembly Committee
 6255 Sunset Bl. Ste. 2000
 Los Angeles, Ca. 90028

Name of Employer

I.D.# C00133686

Date (month, day, year)

5/11/82

Amount of Each Receipt This Period
 \$1000.

Occupation

Receipt For Primary General
 Other (specify):

Aggregate Year-to-Date-\$

D. Full Name, Mailing Address and ZIP Code

SEIU-COPE Fund PAC
 2020 K. Street, N.W.
 Washington, D.C. 20006

Name of Employer

I.D.# C00004036

Date (month, day, year)

5/1/82

Amount of Each Receipt This Period
 \$2000.

Occupation

Receipt For Primary General
 Other (specify):

Aggregate Year-to-Date-\$

E. Full Name, Mailing Address and ZIP Code

UAPAC-United Assoc. of Journeymen & Apprentices of Plumbing & Pipe-Fitting Industry
 901 Massachusetts Ave. N.W.
 Washington, D.C. 20006

Name of Employer

I.D.#

Date (month, day, year)

5/5/82

Amount of Each Receipt This Period
 \$1000.

Occupation

Receipt For Primary General
 Other (specify):

Aggregate Year-to-Date-\$

F. Full Name, Mailing Address and ZIP Code

UAW V CAP
 800 E. Jefferson
 Detroit, Mi. 48214

Name of Employer

I.D.# C00002840

Date (month, day, year)

5/17/82

Amount of Each Receipt This Period
 \$5000.

Occupation

Receipt For Primary General
 Other (specify):

Aggregate Year-to-Date-\$

G. Full Name, Mailing Address and ZIP Code

United Food & Commercial Workers International Union, ABC
 1775 K Street, N.W.
 Washington D.C. 20006

Name of Employer

I.D.# C00002766

Date (month, day, year)

5/11/82

Amount of Each Receipt This Period
 \$4600.

Occupation

Receipt For Primary General
 Other (specify):

Aggregate Year-to-Date-\$

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

9840 AN075183645

EXHIBIT D

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

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

v.)

MUR No. 1716)

Edmund G. Brown, Jr.; Brown for)
U.S. Senate; American Federation)
of Teachers, Committee on)
Political Education and its)
affiliated separate segregated)
fund, Political Action Council)
of Educators; Amalgamated)
Clothing and Textile Workers)
Union Political Action Committee;)
International Ladies Garment)
Workers Union Campaign Committee,)
and all the Committees')
treasurers,)
Respondents.)

AFFIDAVIT OF KRISTA L. PETERSON

COMMONWEALTH OF VIRGINIA)
FAIRFAX COUNTY) ss.

I, Krista L. Peterson, do hereby affirm and swear that
I have personal knowledge of the facts set forth herein:

1. I am a citizen of the United States and am over the age of 18 years.
2. I am an intern for the Center on National Labor Policy, Inc.

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EXHIBIT E

3. On August 1, 1984, I photocopied a candidate committee report FEC FORM 3, Schedule A, FEC Microfilm # 82020071976, at the public records office of the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463.

4. The document which I photocopied is attached hereto as Exhibit D.

Further Affiant sayeth naught.

Krista L. Peterson
Krista L. Peterson

Sworn before me this 2nd day of August, 1984.

Lyane D. Holloman
Notary Public
My Commission expires: September 7, 1985

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202-879-1400

AMERICAN FEDERATION OF TEACHERS
COMMITTEE OF POLITICAL EDUCATION

I.D.# 23-7267967 917

May 26 19 82 5:11

Brown For U.S. Senate

\$ 5000.00

5000 DOLLARS

DOLLARS

ENDORSE

Charles H. ...
Robert ...

⑆000917⑆ ⑆0540⑆0004⑆ 3 526 77⑆

Handwritten signature

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8 8
8 5 0 4 X 0

EXHIBIT

(Summary Page)

84 JUL 11 10:30 AM ALABAMA

ALIEN AREA

1. Name of Committee (in Full)
**ALIGNMENT CLOTHING AND TEXTILE WORKERS UNION
 POLITICAL ACTION COMMITTEE**

Address (Number and Street)
15 UNION SQUARE

City, State and ZIP Code
NEW YORK, NEW YORK 10003

Check here if address is different than previously reported.

2. FEC Identification Number
C 00005728

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

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 _____
 Twelfth day report preceding _____ (Type of Election)
 election on _____ in the State of _____
 Thirtieth day report following the General Election
 on **11/2/82** in the State of **all states**
 Termination Report
 (b) Is this Report an Amendment? YES NO

SUMMARY

5. Covering Period **10/14/82** through **11/22/82**

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

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

(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 20)

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
6(a)		\$ 59,534.99
6(b)	\$ 9,216.79	
6(c)	\$ 38,459.35	\$ 155,898.10
6(d)	\$ 47,676.14	\$ 215,433.09
7	\$ 14,531.50	\$ 182,288.45
8	\$ 33,144.64	\$ 33,144.64
9	\$	
10	\$	

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

GEORGE SOLOMONS
 Type or Print Name of **ASST. Treasurer**

[Signature]
 SIGNATURE OF **ASST. Treasurer**

June 29, 1984
 Date

For further information contact:
 Federal Election Commission
 Toll Free 800 424 9530
 Local 202 523 4088

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

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)

R 6 0 34 30 15 1843869 4 9

EXHIBIT C

Any information omitted from this Form and its instructions may not be sufficient to ensure proper processing of contributions and/or disbursements, which may delay payment and address of any political committee or other recipient of such payments.

Name of Committee (in Full)

Amalgamated Clothing and Textile Workers Union Political Action Committee

9 1 0 0 3 3 0 4 0 4 8 9 3 4 6 5 0

A. Full Name, Mailing Address and ZIP Code Bob Stansbury for Congress Committee 101 No. High St. P.O. Box 19090 Columbus, Ohio 43215 OHIO	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/18/82	Amount of Each Disbursement This Period 300.00
B. Full Name, Mailing Address and ZIP Code Paul Sloan Congress Committee 231 West Main, Apt. East Carbondale, Ill. 62901 Ill.	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/18/82	Amount of Each Disbursement This Period 500.00
C. Full Name, Mailing Address and ZIP Code Aukerman for Congress Committee P.O. Box 172 Providence, R.I. 02901 R.I.	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/18/82	Amount of Each Disbursement This Period 250.00
D. Full Name, Mailing Address and ZIP Code Brown for Senate Campaign 1125 West 6th St. Los Angeles, Calif. 90017 CALIF.	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/18/82	Amount of Each Disbursement This Period 1000.00
E. Full Name, Mailing Address and ZIP Code James McClure Clarke for Congress P.O. Box 7434 Asheville, No. Car. 28817 NO. CAR.	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/18/82	Amount of Each Disbursement This Period 300.00
F. Full Name, Mailing Address and ZIP Code Friends of Bob Carr 2110 East Michigan Lansing, Mich. 48912 MICH.	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/22/82	Amount of Each Disbursement This Period 2000.00
G. Full Name, Mailing Address and ZIP Code Monriva for Congress 829 North Kentview, N.E. Grand Rapids, Mich. 49505 MICH.	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/22/82	Amount of Each Disbursement This Period 2000.00
H. Full Name, Mailing Address and ZIP Code Committee to Re-elect Leo C Zeffereetti C/O Joseph P. DeFina P.O. Box 221-Rad Hook Station Brooklyn, N.Y. 11231 N.Y.	Purpose of Disbursement Tickets Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/22/82	Amount of Each Disbursement This Period 100.00
I. Full Name, Mailing Address and ZIP Code Oliner for Congress 1507 Lossy Boulevard, South LaCrosse, Wisc. 54601 WISC.	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/26/82	Amount of Each Disbursement This Period 50.00

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

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

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

v.)

Edmund G. Brown, Jr.; Brown for)
U.S. Senate; American Federation)
of Teachers, Committee on)
Political Education and its)
affiliated separate segregated)
fund, Political Action Council)
of Educators; Amalgamated)
Clothing and Textile Workers)
Union Political Action Committee;)
International Ladies Garment)
Workers Union Campaign Committee,)
and all the Committees')
treasurers,)

Respondents.)

MUR No. 1716

COMPLAINANT'S RESPONSE
TO REPLY OF EDMUND G.
BROWN, JR., BROWN FOR
U.S. SENATE COMMITTEE,
JULES GLAZER AND BURT
PINES

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11/17/64:12

I. INTRODUCTION

On July 30, 1984, Complainant received a copy of the Reply of Edmund G. Brown, Jr., Brown for U.S. Senate Committee ("Committee" or "Respondent"), Burt Pines and Jules Glazer.¹ The Complainant takes exception to the Respondent's Reply and states the following:

1) The American Federation of Teachers - Committee on Political Education ("AFT-COPE") and Political Action Council of Educators ("PACE") are affiliated organizations within the meaning of 2 U.S.C. §441a(a)(5).

2) The Committee Treasurer failed to accurately report the \$1,000.00 contribution made by PACE on April 5, 1982.

3) According to the reports filed with the Federal Election Commission ("Commission"), the Committee received excessive contributions from the Amalgamated Clothing and Textile Workers Political Action Committee ("ACTWU-PAC") for the 1982 federal primary election.

4) The Committee received excessive contributions from the International Ladies Garment Workers Union Campaign Committee ("ILGWUCC") for the 1982 federal general election.

¹The Complainant did not receive a copy of the briefs filed by the other respondents. "Respondent" herein refers only to Edmund G. Brown, Jr., Brown for U.S. Senate Committee, Burt Pines and Jules Glazer.

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II. DISCUSSION

A. The American Federation of Teachers-Committee on Political Education ("AFT-COPE") and Political Action Council of Educators ("PACE") are Affiliated Organizations.

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The Respondent states that AFT-COPE and PACE have taken the position before the Commission that they are not affiliated organizations. It is Complainant's belief that both AFT-COPE and PACE are separate segregated funds of the American Federation of Teachers ("AFT"), and that, therefore, contributions made by AFT-COPE and PACE 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).

PACE designated United Teachers - Los Angeles ("UTLA") as an affiliated or connected organization on its Statement of Organization. (See Exhibit A). UTLA has not filed a Statement of Organization with the Commission. However, in a letter dated October 25, 1983, the treasurer of PACE notified the Commission that the name United Teacher - Los Angeles will appear on all of its future statements. (See Exhibit B). The UTLA letterhead lists its officers which includes AFT Vice-President Michael Bennett in his official capacity. Since AFT-COPE and PACE are each affiliated with AFT, contributions made by AFT-COPE and PACE are treated as contributions from a single committee.

B. The Treasurer of the Brown for U.S. Senate Committee Failed to Accurately Report the \$1,000 Contribution Made By PACE on April 5, 1982.

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The Respondent states that the Committee treasurer clearly designated the \$1,000.00 contribution made by PACE on April 5, 1982, and received by the Committee on April 15, 1982, as for the primary election. The contribution in question is designated for the primary election on the copy of the Committee's report which was submitted with the Respondent's Reply. (See Exhibit C and Exhibit F of Respondent's Reply). However, the contribution is not designated for either election on the report which was filed with the Commission (See Exhibit D and Affidavit of Krista L. Peterson, attached hereto as Exhibit E). Therefore, the treasurer of the Committee violated 11 C.F.R. §104.14(d) by failing to accurately report the \$1,000.00 contribution.

C. The Committee Treasurer Properly Reported the \$4,425.00 Contribution Made By AFT-COPE on August 12, 1982.

The Complaint states that AFT-COPE made a \$5,000.00 contribution and a \$4,425.00 contribution on May 26, 1982 which were designated as contributions for the primary election. After reexamination of the reports, it appears that AFT-COPE amended its original report to redesignate the \$5,000.00 contribution as \$4,425.00 for the primary election and \$575.00 for the general election.

Complainant believed that AFT-COPE made two separate contributions on May 26, 1982 rather than one contribution which was amended. The Complainant believed that the \$5,000.00 contribution was received on June 5, 1982 and that the \$4,425.00 contribution for the primary election was received by the Committee on August 18, 1982. However, it appears that the Respondent is correct in stating that the \$4,425.00 contribution which was received on August 18, 1982, was made on August 12, 1982 and designated by AFT-COPE as a contribution for the general election. Therefore, it is now Complainant's belief that the \$4,425.00 contribution was properly reported by the Committee's treasurer as a contribution for the general election.

D. According to the Reports Filed With the Commission, the Committee Received Excessive Contributions from the Amalgamated Clothing and Textile Workers Political Action Committee ("ACTWU-PAC").

The Respondent states that it did not receive excessive contributions from ACTWU-PAC for the 1982 primary election. The Committee received a \$5,000.00 contribution on May 27, 1982 and a \$1,000.00 contribution on November 4, 1982 which were reported by ACTWU-PAC as contributions for the primary election. The Respondent alleges that the \$1,000.00 contribution was not designated for a particular election and submits a copy of the check (See Exhibit F and Respondent's Exhibit G). The Respondent

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further states that since the contribution was not designated in writing as for a particular election and was made after the primary election, it is considered a contribution for the general election in accordance with 11 C.F.R. §110.1(a)(2)(ii)(B).

Complainant has relied on the public records which indicate that a violation of the Federal Election Campaign Act ("Act") has occurred. ACTWU-PAC reported the \$1,000.00 contribution as for the primary election on its FEC Form 3X, Schedule B. The Respondent states that this was a clerical error and that ACTWU-PAC has since amended its report. The amendment was filed on July 11, 1984, after the Complaint was filed. (See Exhibit G).

Since public citizens are not privy to the correspondence between political action committees and candidate committees which accompany contributions, they must be able to rely on the public records. 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 or statement contained in it." This provision is rendered meaningless if a treasurer of a political committee is relieved of all liability by merely stating that a violation which has appeared in the public records for two years is the result of a "clerical error." To allow a treasurer to amend reports to allegedly comply with the Act post hoc in response to a complaint, without imposing any sanctions, is to vitiate the purpose of the Act.

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B. The Committee Received Excessive Contributions from the International Ladies Garment Workers Union Campaign Committee ("ILGWUCC") for the 1982 Federal General Election.

The Respondent admits that it received a total of \$6,000.00 from the ILGWUCC for the 1982 federal general election. However, the Committee argues that the receipt of the excess contribution of \$1,000.00 should not constitute a violation of 2 U.S.C. §441a(f) because it was the result of a clerical error and because the \$1,000.00 has subsequently been refunded. Neither of these responses is satisfactory.

First, the Committee states that the \$4,000.00 contribution was recorded as a contribution from the "International Ladies Garment Workers Union." The two additional contributions were reported as contributions from the "ILGWU." The Respondent alleges that because of this clerical error, the Committee did not know that the contributions were from the same organization. It is difficult to believe that the treasurer used "best efforts" when he accepted contributions from an organization with an abbreviated name without attempting to discover what the abbreviation stood for.

Furthermore, the refund of the contribution almost two years after it was accepted is not a sufficient remedy. The Complainant recommends that the Respondent also be required to return the interest on the \$1,000.00 and that a civil penalty be levied against the Respondent for violating the Act. Unless

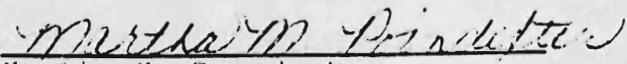
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some sanction is imposed, candidate committees can accept excessive contributions with impunity and later return the money without interest only if a complaint is filed. This result would permit the Committee to benefit from its own violation.

III. CONCLUSION

As documented above, the Respondent has violated the Federal Election Campaign Act. Complainant requests that Respondents be required to return the accepted excess contributions with interest and that civil sanctions be imposed on the Respondent.


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

August 10, 1984

86040353658

VERIFICATION OF CITIZEN COMPLAINT

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 Response to Reply of Edmund G. Brown, Jr., Brown for U.S. Senate Committee, Jules Glazer and Burt Pines and know the contents thereof, and that the same is true on information and belief. This Response 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 E. Antosh

Subscribed and sworn to before me this 7th day of August 1984.

Marise K. Almon
Notary Public

My Commission expires:

Sept. 17, 1986

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EXHIBIT A

REGISTRATION FORM AND STATEMENT OF ORGANIZATION
FOR A
POLITICAL COMMITTEE

New Registration
 Registration Amendment
I.D. # _____

HAND DELIVERED

SEE REVERSE SIDE FOR ADDITIONAL INSTRUCTIONS
ALL QUESTIONS MUST BE ANSWERED FOR NEW REGISTRATIONS

1. Full name of committee: Political Action Council of Educators
Mailing address and ZIP code: 234 Loma Drive, Los Angeles, CA 90026
Telephone number: 213-483-8611

2. Affiliated or connected organizations:

Name of affiliated or connected organization	Mailing address and ZIP code	Relationship
United Teachers-Los Angeles	234 Loma Drive, L. A. CA 90026	Membership generally similar

3. Area, scope and jurisdiction of the committee:

- (a) Will this committee operate in more than one State? no
- (b) Will it operate on a statewide basis in one State? no
- (c) Will it primarily support candidates seeking State or local office? yes
- (d) Will it support a candidate for the U.S. House of Representatives in an aggregate amount in excess of \$1,000 during the calendar year? yes

4. (a) If the committee is supporting individual candidates for the U.S. House of Representatives, list each candidate by name, address, office sought, and party affiliation:

Full names of candidates	Mailing address and ZIP code	State and Congressional District	Party
Arlene Mathews	7118 Topanga Canyon Blvd., Canoga Park, CA 91303	20 CD	D
Robert White	12316 E. Firestone Blvd., Norwalk, Calif. 90650	33 CD	

(b) List by name, address, office sought, and party affiliation, any candidate for other Federal or public office that this committee is supporting:

Full names of candidates	Mailing address and ZIP code	Office sought	Party
Alan Cranston	6420 Wilshire Blvd., Los Angeles, CA 9004-	Senator Calif.	D

5. If this committee is supporting the entire ticket of a party, give name of party: _____

*Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Submit in appropriate box above when information is contained on separate page(s).

Revised January 1974

U.S. GOVERNMENT PRINTING OFFICE: 1974-0-257-776

74099752053.00660



10-25-83

OFFICERS

JUDY BOLKOVITS
President

FRANCIS HAYWOOD
N.E.A. Vice President

MICHAEL BENNETT
A.F.T. Vice President

ELISE AKITA MYERS
Elementary Vice President

MARVIN KATZ
Secondary Vice President

ROBERTA LEAP
Secretary

GERALD REEDY
Treasurer

October 25, 1983

Federal Election Commission
13 K Street
Washington, D. C. 20463

Attn: Pamela Brown

Dear Ms. Brown:

We received your letter dated October 13, 1983, yesterday, regarding our Political Report dated September 27, 1983.

As per your telephone conversation this morning with Eva Johnson of our office, we are notifying you that as of this date the name United Teachers-Los Angeles will appear on all statements filed hereafter.

Very truly yours,

Gerald A. Reedy

Gerald A. Reedy
Treasurer

GAR/ej
opeiu #30
afl-cio,clc

EXHIBIT B

SCHEDULE A

ITEMIZED RECEIPTS

EXHIBIT C

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)			
Brown for U.S. Senate			
A. Full Name, Mailing Address and ZIP Code Political Action Council Of Educators 2511 W 3rd Street Los Angeles, CA 90057	Name of Employer I.D.# COO023754	Date (month, day, year) 4/15/82	Amount of Each Receipt this Period \$1000.
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
B. Full Name, Mailing Address and ZIP Code ROLMPAC 4900 Old Ironsides Dr. Santa Clara, CA 95050	Name of Employer I.D.# COO118224	Date (month, day, year) 4/15/82	Amount of Each Receipt This Period \$150.
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
C. Full Name, Mailing Address and ZIP Code Roos for Assembly Committee 2555 Sunset Bl. Ste. 2000 Los Angeles, Ca. 90028	Name of Employer I.D.# COO133686	Date (month, day, year) 5/11/82	Amount of Each Receipt This Period \$1000.
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
D. Full Name, Mailing Address and ZIP Code SEIU-COPE Fund PAC 2020 K. Street, N.W. Washington, D.C. 20006	Name of Employer I.D.# COOOO4036	Date (month, day, year) 5/1/82	Amount of Each Receipt This Period \$2000.
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
E. Full Name, Mailing Address and ZIP Code UAPAC-United Assoc. of Journeymen & Apprentices of Plumbing & Pipe Fitting Industry 901 Massachusetts Ave. N.W. Washington, D.C. 20006	Name of Employer I.D.#	Date (month, day, year) 5/5/82	Amount of Each Receipt This Period \$1000.
Receipt For: <input checked="" 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 UAW V CAP 800 E. Jefferson Detroit, Mi. 48214	Name of Employer I.D.# COOOO2840	Date (month, day, year) 5/17/82	Amount of Each Receipt This Period \$5000.
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
G. Full Name, Mailing Address and ZIP Code United Food & Commercial Workers International Union, ABC 1775 K Street, N.W. Washington D.C. 20006	Name of Employer I.D.# COOOO2766	Date (month, day, year) 5/11/82	Amount of Each Receipt This Period \$4600.
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
SUBTOTAL of Receipts This Page (optional)			7,750.00
TOTAL This Period (last page this line number only)			

SCHEDULE A

ITEMIZED RECEIPTS

Page 2 of 4
 LINE NUMBER 408
 (Use separate schedules for each category of the Data on 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 to use the name and address of any political committee to solicit contributions from such committee.

Receipt for: Money for U.S. Senate

0 9 3 0 4 0 7 1 8 3 6 6 3

A. Full Name, Mailing Address and ZIP Code Political Action Council of Educators 2511 W 3rd Street Los Angeles, CA 90057	Name of Employer I.D. # C00023754	Date (month, day, year) 4/15/82	Amount of Each Receipt This Period \$1000.
	Occupation _____		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____	Aggregate Year-to-Date-\$ _____		

B. Full Name, Mailing Address and ZIP Code NOLMPAC 4900 Old Ironsides Dr. Santa Clara, CA 95050	Name of Employer I.D. # C00118224	Date (month, day, year) 4/15/82	Amount of Each Receipt This Period \$150.
	Occupation _____		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____	Aggregate Year-to-Date-\$ _____		

C. Full Name, Mailing Address and ZIP Code ROCS for Assembly Committee 6255 Sunset Bl. Ste. 2000 Los Angeles, Ca. 90028	Name of Employer I.D. # C00133686	Date (month, day, year) 5/11/82	Amount of Each Receipt This Period \$1000.
	Occupation _____		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____	Aggregate Year-to-Date-\$ _____		

D. Full Name, Mailing Address and ZIP Code CHIP-COPE Fund PAC 2020 K. Street, N.W. Washington, D.C. 20006	Name of Employer I.D. # C00004036	Date (month, day, year) 5/1/82	Amount of Each Receipt This Period \$2000.
	Occupation _____		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____	Aggregate Year-to-Date-\$ _____		

E. Full Name, Mailing Address and ZIP Code UAFAC-United Assoc. of Journeymen & Apprentices of Plumbing & Pipe-Fitting Industry 111 Massachusetts Ave. N.W. Washington, D.C. 20004	Name of Employer I.D. # _____	Date (month, day, year) 5/5/82	Amount of Each Receipt This Period \$1000.
	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 _____ 300 E. Jefferson Detroit, MI. 48214	Name of Employer I.D. # C00002840	Date (month, day, year) 5/17/82	Amount of Each Receipt This Period \$5000.
	Occupation _____		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____	Aggregate Year-to-Date-\$ _____		

G. Full Name, Mailing Address and ZIP Code United Foot & Commercial Workers International Union, ABC 1375 G Street, N.W. Washington, D.C. 20004	Name of Employer I.D. # C00002766	Date (month, day, year) 5/11/82	Amount of Each Receipt This Period \$1000.
	Occupation _____		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____	Aggregate Year-to-Date-\$ _____		

EXHIBIT D

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

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

Complainant,)

v.)

MUR No. 1716

Edmund G. Brown, Jr.; Brown for)
U.S. Senate; American Federation)
of Teachers, Committee on)
Political Education and its)
affiliated separate segregated)
fund, Political Action Council)
of Educators; Amalgamated)
Clothing and Textile Workers)
Union Political Action Committee;)
International Ladies Garment)
Workers Union Campaign Committee,)
and all the Committees')
treasurers,)

Respondents.)

AFFIDAVIT OF KRISTA L. PETERSON

COMMONWEALTH OF VIRGINIA)
) ss.
FAIRFAX COUNTY)

I, Krista L. Peterson, do hereby affirm and swear that
I have personal knowledge of the facts set forth herein:

1. I am a citizen of the United States and am over the
age of 18 years.

2. I am an intern for the Center on National Labor Policy,
Inc.

35040583664

EXHIBIT E

3. On August 1, 1984, I photocopied a candidate committee report FEC FORM 3, Schedule A, FEC Microfilm # 82020071976, at the public records office of the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463.

4. The document which I photocopied is attached hereto as Exhibit D.

Further Affiant sayeth naught.

Krista L. Peterson
Krista L. Peterson

Sworn before me this 2nd day of August, 1984.

James H. Holloman
Notary Public
My Commission expires: September 7, 1985

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202-879-1400

AMERICAN FEDERATION OF TEACHERS
COMMITTEE OF POLITICAL EDUCATION

I.D.# 23-7267967 917

May 26 19 82 5-2/11

BY THE ORDER OF

Brown For U.S. Senate

\$ 5000.00

5000 DOLLARS

DOLLARS

UNITED STATES FEDERAL RESERVE SYSTEM

Charles H. ...
Robert ...

⑈000917⑈ ⑆0540⑈0004⑈ 3 526 77⑈

85040

Handwritten signature

EXHIBIT F

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

Name of Committee (In Full)

Amalgamated Clothing and Textile Workers Union Political Action Committee

9 430 53 03 4 0 4 3 9 3 4 5 30

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bob Shansky for Congress Committee 101 No. High St. P.O. Box 15668 Columbus, Ohio 43215 OHIO	Contribution	10/18/82	300.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Paul Simon Congress Committee 231 West Maine, Apt. East Carbondale, Ill. 62901 ILL.	Contribution	10/18/82	500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Aukerman for Congress Committee P.O. Box 172 Providence, R.I. 02901 R.I.	Contribution	10/18/82	250.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Brown for Senate Campaign 1125 West 6th St. Los Angeles, Calif. 90017 CALIF.	Contribution	10/18/82	1000.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
James McClure Clarke for Congress P.O. Box 7434 Asheville, No. Car. 28817 NO. CAR.	Contribution	10/18/82	300.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Friends of Bob Carr 2110 East Michigan Lansing, Mich. 48912 MICH.	Contribution	10/22/82	2000.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Monsma for Congress 829 North Kentview, N.E. Grand Rapids, Mich. 49505 MICH.	Contribution	10/22/82	2000.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Committee to Re-elect Leo C Zeffereetti C/O Joseph F. DeFina P.O. Box 221-Red Hook Station Brooklyn, N.Y. 11231 N.Y.	Tickets	10/22/82	100.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Offner for Congress 1507 Losey Boulevard, South LaCrosse, Wisc. 54601 WISC.	Contribution	10/26/82	50.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

SUBTOTAL of Disbursements This Page (optional) _____

TOTAL This Period (last page this line number only) _____

BCC #4348

REAVIS & McGRATH

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SIXTH FLOOR · BROADWAY PLAZA

700 SOUTH FLOWER STREET

LOS ANGELES, CALIFORNIA 90017

TELEPHONE 213 626-5241
TELECOPIER 213 680-4518
CABLE ADDRESS KEARN
TELEX. 69-1208

345 PARK AVENUE
NEW YORK, N. Y. 10154

August 16, 1984

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

Re: MUR 1716

AUG 17 4 9: 00

Gentlemen:

Enclosed is the executed Affidavit filed as Exhibit R of the Reply to the complaint filed by James Edward Antosh in connection with MUR 1716. Also enclosed are "Statement of Designation of Counsel" forms executed by Burt Pines, Jules Glazer and Jodie Krajewski on behalf of the Brown For U.S. Senate Committee, to be filed with the Commission in accordance with my telephone conversation with Mr. Peter Knych on August 14, 1984.

Please call me if you have any questions.

Very truly yours,

R. Loomis
Roger D. Loomis, Jr.

RDL/ek

cc: Mr. Peter Knych (w/encl.)

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AFFIDAVIT OF BURT PINES

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I, BURT PINES, being duly sworn, depose and state as follows:

1. I am an attorney, admitted to practice in the State of California, and a member of the law firm of Alschuler, Grossman & Pines, 1880 Century Park East, Los Angeles, California 90067.

2. I am submitting this affidavit in opposition to the Complaint numbered MUR 1716, filed with the Federal Election Commission (the "Commission") on May 31, 1984, by James Edward Antosh, which alleges that I and the Brown for U.S. Senate Committee (the "Committee") violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.14(d). Mr. Antosh's complaint is unfounded because I never "knowingly" accepted, or caused to be accepted and retained, any illegal contributions.

3. I served as Los Angeles City Attorney between 1973 and 1981. In that capacity, I was responsible for enforcing local and state election laws and providing election law advice to candidates and elected officials. I also was elected and therefore was personally subject to local and state election laws. While I was City Attorney, I scrupulously endeavored to comply with the applicable election and campaign reporting laws.

//

8504056670

1 4. Toward the end of my term as City Attorney,
2 Governor Edmund G. Brown, Jr. asked me to serve as the treasurer
3 of his Senate campaign. As a public service, and because I was
4 committed to his candidacy, I agreed to take the position, com-
5 mencing August 1, 1981.

6 5. My term as City Attorney ended on June 30, 1981.
7 After a month's vacation with my family, I began work with my
8 new law firm on August 1, 1981. On that date I also assumed the
9 treasurer position of the Brown campaign. I served as treasurer
10 until the end of that Senate campaign.

11 6. Throughout the period I was treasurer, I
12 endeavored to make sure that the Committee complied with federal
13 election laws. I know Governor Brown shared the same commit-
14 ment. (No doubt this is one of the reasons why he wanted me as
15 treasurer, given my law enforcement background.) I also believe
16 that Jodie Krajewski and her campaign staff felt the same way,
17 and that they took all reasonable measures to avoid election law
18 violations.

19 7. Shortly after becoming treasurer, I reviewed with
20 the staff the various procedural safeguards they had established
21 to assure compliance with the election laws and I made some
22 revisions of those procedures as needed. Those procedures are
23 summarized in Reavis & McGrath's letter to the Federal Election
24 Commission (MUR 1601) filed with the Commission on March 6,
25 1984.

26 8. As an additional safeguard, I endeavored to review
27 all campaign contributions received by the Committee -- subject
28 to the demand of my private law practice. I was able to review

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 1716

NAME OF COUNSEL: Reavis & McGrath

ADDRESS: 700 South Flower Street

Suite 600

Los Angeles, California 90017

TELEPHONE: (213) 626-5241

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.

8-15-84
Date

Jules Glazer
Signature

RESPONDENT'S NAME: Jules Glazer

ADDRESS: c/o Brown For U.S. Senate

1125 West Sixth Street

Los Angeles, California 90017

HOME PHONE: _____

BUSINESS PHONE: (213) 977-1313

85040533672

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1716

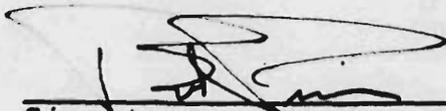
NAME OF COUNSEL: Reavis & McGrath

ADDRESS: 700 S. Flower Street, Suite 600
Los Angeles, California 90017

TELEPHONE: (213) 626-5241

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.

8/15/84
Date


Signature

RESPONDENT'S NAME: Burt Pines

ADDRESS: c/o Alschuler, Grossman & Pines
1880 Century Park East
Los Angeles, California 90067-1694

HOME PHONE: _____

BUSINESS PHONE: (213) 277-1226

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 1716

NAME OF COUNSEL: Reavis & McGrath

ADDRESS: 700 South Flower Street

Suite 600

Los Angeles, California 90017

TELEPHONE: (213) 626-5241

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.

8-15-84

Date

Jodie Krayewski
Signature

RESPONDENT'S NAME: Brown For U.S. Senate

ADDRESS: 1125 West Sixth Street

Los Angeles, California 90017

HOME PHONE: _____

BUSINESS PHONE: (213) 977-1313

86040703674

REAVIS & MCGRATH
SIXTH FLOOR · BROADWAY PLAZA
700 SOUTH FLOWER STREET
LOS ANGELES, CALIFORNIA 90017

TO:

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



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LOS ANGELES, CALIFORNIA 90017

345 PARK AVENUE
NEW YORK, N. Y. 10154

TELEPHONE 213 626-5241
TELECOPIER 213 680-4518
CABLE ADDRESS KEARN
TELEX: 69-1208

August 13, 1984

AUG 14 9 4: 36

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

Re: MUR 1716

Gentlemen:

In connection with MUR 1716, enclosed is a copy of an Amendment to the "Twelfth Day Report" preceding the primary election on June 8, 1982, which we understand was filed with the Commission on August 6, 1984. As requested, the enclosure is submitted as an amendment to and is incorporated by reference in Exhibit F to the Reply Brief of Edmund G. Brown, Jr., et al., dated July 27, 1984 and filed with the Commission on July 30, 1984.

Please telephone the undersigned if we can furnish any further information.

Very truly yours,


Roger D. Loomis, Jr.

RDL/js

Enclosure

cc: Mr. Peter Knych (w/encl.)

45040706675

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

Name of Committee (in Full) :

BROWN FOR U.S. SENATE

Report Covering the Period:

From: 4/1/82

To: 5/19/82

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees 145,853.00 (Memo Entry Unitemized \$ 35,743.00)	181,596.00	554,279.64
(b) Political Party Committees	48,850.00	64,625.00
(c) Other Political Committees	00	00
(d) The Candidate	00	00
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b, 11c and 11d)	230,446.00	618,904.64
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	00	00
13. LOANS:		
(a) Made or Guaranteed by the Candidate	00	00
(b) All Other Loans	00	00
(c) TOTAL LOANS (add 13a and 13b)	00	00
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	20.00	255.40
15. OTHER RECEIPTS (Dividends, Interest, etc.)	38,960.28	79,655.37
16. TOTAL RECEIPTS (Add 11a, 12, 13c, 14 and 15)	269,426.28	698,815.41
II. DISBURSEMENTS		
17. OPERATING EXPENDITURES	117,835.75	303,352.57
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	00	00
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate	00	00
(b) Of All Other Loans	00	00
(c) TOTAL LOAN REPAYMENTS (add 19a and 19b)	00	00
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	3,470.00	10,254.96
(b) Political Party Committees	9,000.00	9,000.00
(c) Other Political Committees	00	00
(d) TOTAL CONTRIBUTION REFUNDS (add 20a, 20b and 20c)	12,470.00	19,254.96
21. OTHER DISBURSEMENTS	00	00
22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21)	130,305.75	322,607.33

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD	\$ 1,919,238.86
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	\$ 269,426.28
25. SUBTOTAL (Add Line 23 and Line 24)	\$ 2,188,665.14
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	\$ 130,305.75
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	\$ 2,058,359.39

0005 040 50 367811

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)			
Brown for U.S. Senate			
A. Full Name, Mailing Address and ZIP Code Political Action Council of Educators 2511 W 3rd Street Los Angeles, CA 90057	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	I.D.# C00023754	4/15/82	\$1000.
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$
B. Full Name, Mailing Address and ZIP Code			
ROLMPAC			
4900 Old Ironsides Dr. Santa Clara, CA 95050			
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	I.D.# C00118224	4/15/82	\$150.
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$
C. Full Name, Mailing Address and ZIP Code			
Roos for Assembly Committee			
6255 Sunset Bl. Ste. 2000 Los Angeles, Ca. 90028			
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	I.D.# C00133686	5/11/82	\$1000.
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$
D. Full Name, Mailing Address and ZIP Code			
SEIU-COPE Fund PAC			
2020 K. Street, N.W. Washington, D.C. 20006			
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	I.D.# C00004036	5/1/82	\$2000.
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$
E. Full Name, Mailing Address and ZIP Code			
UAPAC-United Assoc. of Journeyman & Apprentices of Plumbing & Pipefitting Industry			
901 Massachusetts Ave. N.W. Washington, D.C. 20001			
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	I.D.#	5/5/82	\$1000.
Receipt For: <input checked="" 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			
UAW V CAP			
800 E. Jefferson Detroit, Mi. 48214			
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	I.D.# C00002840	5/17/82	\$5000.
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$
G. Full Name, Mailing Address and ZIP Code			
United Food & Commercial Workers International Union, ABC			
1775 K Street, N.W. Washington D.C. 20006			
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	I.D.# C00002766	5/11/82	\$4600.
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$

SUBTOTAL of Receipts This Page (optional) 17,750.-

TOTAL This Period (last page this line number only)

10/14 PM:4

REAVIS & MCGRATH
SIXTH FLOOR • BROADWAY PLAZA
700 SOUTH FLOWER STREET
LOS ANGELES, CALIFORNIA 90017

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

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LOS ANGELES, CALIFORNIA 90017

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348 PARK AVENUE
NEW YORK, N. Y. 10184
1776 F STREET, N. W.
WASHINGTON, D. C. 20006

July 31, 1984

General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Mr. Peter Knych

Re: MUR 1716

Dear Peter:

Enclosed please find two copies of the Robledo affidavit and the original, which affirms that the notations that we discussed were made after receipt of the Antosh complaint.

If you need any other documents, please call either Roger Loomis or me at this office.

Thank you for your cooperation in this matter.

Very truly yours,



Cynthia K. Thornton

CKT/nb
Enclosures

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AUG 1 11:02

DECLARATION OF CARMEN ROBLEDO

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I, CARMEN ROBLEDO, declare and say:

1. This affidavit is submitted in response to the assertions made by the General Counsel's office that the notations made in Exhibits O and P of the reply brief (the "Brief") filed by counsel for Edmund G. Brown, Jr., the Brown For U.S. Senate Committee, Jules Glazer, and Burt Pines (the "Committee Group") with the Federal Election Commission (the "Commission") in regard to MUR 1716 were made prior to any notice from the Commission that the Committee Group may have violated the Federal Election Campaign Act of 1971, as amended (the "Act").

2. I have worked for the Brown For U.S. Senate Committee since May of 1982. I have held several positions, including bookkeeper.

3. I received a copy of the complaint filed by James Edward Antosh (the "Antosh Complaint") designated as MUR 1716 on or about June 11, 1984.

4. On or about July 12, 1984, I received a request from the office of counsel for the Committee Group requesting copies of documents pertinent to the allegations contained in the Complaint. I thereafter provided counsel with the requested documents.

5. Two of the documents pertinent to the allegations contained in the Complaint are Exhibits O and P of the Brief.

6. I made notations, including those in Exhibits O and P, in the margins of the documents to enable counsel for the

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1 Committee Group and the Commission to quickly locate the
2 relevant entries. These notations were also highlighted.

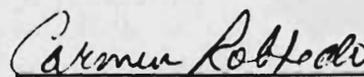
3 7. I made these notations in response to allegations
4 contained in the Antosh Complaint.

5 8. Specifically, the notation made in Exhibit O of
6 the Brief, identifying the International Ladies Garment Workers
7 Union as the ILGWU, was made after I received a copy of the
8 Antosh Complaint.

9 9. Additionally, the notation made in Exhibit P of
10 the Brief, identifying the ILGWU as the International Ladies
11 Garment Workers Union, was made after I received a copy of the
12 Antosh Complaint.

13 I declare, under penalty of perjury, that the fore-
14 going is true and accurate.

15 Dated this 31st day of July, 1984 in Los Angeles,
16 California.

17
18 
19 Carmen Robledo

DECLARATION OF CARMEN ROBLEDO

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I, CARMEN ROBLEDO, declare and say:

1. This affidavit is submitted in response to the assertions made by the General Counsel's office that the notations made in Exhibits O and P of the reply brief (the "Brief") filed by counsel for Edmund G. Brown, Jr., the Brown For U.S. Senate Committee, Jules Glazer, and Burt Pines (the "Committee Group") with the Federal Election Commission (the "Commission") in regard to MUR 1716 were made prior to any notice from the Commission that the Committee Group may have violated the Federal Election Campaign Act of 1971, as amended (the "Act").

2. I have worked for the Brown For U.S. Senate Committee since May of 1982. I have held several positions, including bookkeeper.

3. I received a copy of the complaint filed by James Edward Antosh (the "Antosh Complaint") designated as MUR 1716 on or about June 11, 1984.

4. On or about July 12, 1984, I received a request from the office of counsel for the Committee Group requesting copies of documents pertinent to the allegations contained in the Complaint. I thereafter provided counsel with the requested documents.

5. Two of the documents pertinent to the allegations contained in the Complaint are Exhibits O and P of the Brief.

6. I made notations, including those in Exhibits O and P, in the margins of the documents to enable counsel for the

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Committee Group and the Commission to quickly locate the relevant entries. These notations were also highlighted.

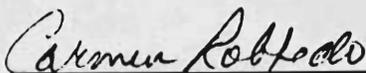
7. I made these notations in response to allegations contained in the Antosh Complaint.

8. Specifically, the notation made in Exhibit O of the Brief, identifying the International Ladies Garment Workers Union as the ILGWU, was made after I received a copy of the Antosh Complaint.

9. Additionally, the notation made in Exhibit P of the Brief, identifying the ILGWU as the International Ladies Garment Workers Union, was made after I received a copy of the Antosh Complaint.

I declare, under penalty of perjury, that the foregoing is true and accurate.

Dated this 31st day of July, 1984 in Los Angeles, California.


Carmen Robledo

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REAVIS & McGRATH
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TO: FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
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Judge (Ret.) William S. Hassen

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Diana Denton
Bruce A. Sackett

Michael Smolen
Leslie J. Garber
Joseph Posner
Martin S. Bakst
Bruce B. Johnson

August 2, 1984

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

Re: Political Action Council of Educators and William
Zimmerman, Treasurer, and United Teachers-Los Angeles
MUR 1716

Dear Mr. Steele:

This letter constitutes the response of the Political Action
Council of Educators and William Zimmerman, Treasurer, and the
United Teachers-Los Angeles (Respondents) to the above complaint,
MUR 1716.

the Political Action Council of Educators, United Teachers-Los
Angeles and Treasurer, William Zimmerman, are not affiliated
with the American Federation of Teachers Committee on Political
Education pursuant to 2 U.S.C. Section 441(a)(5). Based on
such lack of affiliation, the Respondents have not violated the
Act regarding any contributions made in 1982 to the Brown for
United States Senate Committee.

United Teachers-Los Angeles is an independent autonomous
teachers union representing certificated employees in the Los
Angeles Unified School District in Los Angeles, California.
The teachers as members of the United Teachers-Los Angeles
individually determine as to whether they are to become members
of either the American Federation of Teachers or the National
Education Association. PACE is a political committee organized
by United Teachers-Los Angeles and is not affiliated in any
manner with the Political Action Committee of the American
Federation of Teachers or the National Education Association.

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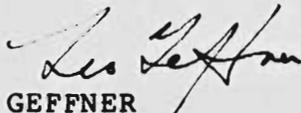
Charles N. Steele, Esq.
Re: PACE, William Zimmerman and UTLA
August 2, 1984
Page Two:

The national organizations or their committees do not in any way establish, finance, maintain or control PACE or is PACE in any manner considered an "affiliated committee" pursuant to the provisions of the Act. Specifically, AFT-COPE did not establish PACE, nor does it in any manner directly or indirectly finance, maintain or control PACE. PACE makes all independent decisions through the structure of United Teachers-Los Angeles regarding any political contributions.

Respondents request that the Commission should dismiss this complaint; however, should the Commission decide to proceed further, Respondents request that the matter be handled through the voluntary informal conciliation proceedings of the Commission.

In the event there is an eventual determination by the Commission that there was a violation of the Act, PACE and its Treasurer, William Zimmerman, and United Teachers-Los Angeles submit that any such possible violations were unintentional and were not willful as PACE, specified above, operates totally independent and without control or direction by the AFT-COPE.

Very truly yours,



LEO GEFFNER
Counsel for
Political Action Council of Educators
and William Zimmerman, Treasurer, and
United Teachers-Los Angeles
LG:ayh
637A11-12

cc: UTLA
Attn: Judy Solkovits, President
William Zimmerman

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Geffner & Satzman

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

SUITE 900

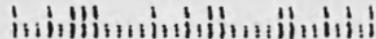
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CAROL S. BERNHEIM*
STEPHEN S. BOOCHEVER
PAMELA S. BOUEY*
PAUL BROWNSTEIN*
DALE E. CALLENDER*

July 25, 1984

* NOT ADMITTED WASHINGTON
** ADMITTED TEXAS ONLY
*** ADMITTED IN ENGLAND AND WALES ALSO

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

Re: MUR 1716

Dear Mr. Steele:

This letter constitutes the response of the American Federation of Teachers, Committee on Political Education and its treasurer, Robert G. Porter, (hereinafter "the Respondents") to a complaint, MUR 1716, which alleges that Respondents may have violated the Federal Election Campaign Act, 2 U.S.C. § 431, et seq. (hereinafter "the Act").

Specifically, the complaint alleges that the Respondent Committee is affiliated, pursuant to 2 U.S.C. § 441a(a)(5), with the Political Action Council of Educators (hereinafter "PACE") and, accordingly, contributions made in 1982 to the Brown for U.S. Senate Committee by Respondent Committee and PACE were in excessive of the Act's limitations.

Respondent Committee denies, however, that it is presently, or ever has been, affiliated with PACE pursuant to 2 U.S.C. § 441a(a)(5), and therefore that it has violated the Act.

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ANALYSIS

Political committees established, financed, maintained or controlled by any labor organization, including any parent, branch or local unit of such labor organization, are considered "affiliated committees" pursuant to 2 U.S.C. § 441a(a)(5). Examination of the various elements of "affiliation," however, reveal that no such relationships exist between the Respondent Committee and PACE. AFT-COPE did not establish PACE, nor does it finance, maintain or control this political committee. Moreover, Complainant does not offer a scintilla of evidence to substantiate his allegation of affiliation.

Additionally, it should be noted that members of PACE are not required to belong to a particular national teachers union, but may individually select to become members of either the American Federation of Teachers or the National Education Association. This ability of PACE members to choose between the two national teacher unions underscores PACE's status as a political committee which is not affiliated pursuant to 2 U.S.C. § 441a(a)(5) with the Respondent Committee.

Accordingly, Respondent Committee denies that it is presently, or ever has been affiliated with PACE under 2 U.S.C. § 441a(a)(5), and therefore that it has violated the Act.

Thus, Respondents request that the Commission take no further action in connection with this matter. Should the Commission decide to proceed further, however, Respondents respectfully request that this matter be handled through voluntary informal conciliation at this stage in the Commission's proceedings.

Further, assuming arguendo that the Commission finds a violation(s) of the Act, Respondents contend that any such violation(s) was inadvertent, and not knowing or willful as the complaint alleges.

Sincerely,

William C. Oldaker

William C. Oldaker
Counsel for American Federation
of Teachers, Committee on
Political Education, and
Robert G. Porter, Treasurer of
the American Federation of
Teachers, Committee on Political
Education

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Telephone: (213) 626-5241

Attorneys for Edmund G. Brown, Jr., Brown For U.S. Senate
Committee, Jules Glazer, and Burt Pines

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	MUR 1716
)	
JAMES EDWARD ANTOSH)	REPLY OF EDMUND G. BROWN, JR.,
)	BROWN FOR U.S. SENATE
v.)	COMMITTEE, JULES GLAZER
)	AND BURT PINES, TO COMPLAINT
EDMUND G. BROWN, JR., <u>et al.</u>)	OF JAMES EDWARD ANTOSH
)	

I.

INTRODUCTION.

By its letter dated June 6, 1984, to Edmund G. Brown, Jr., the Federal Election Commission (the "Commission") informed Edmund G. Brown, Jr., the Brown For U.S. Senate Committee (the "Committee"), Burt Pines, Jules Glazer (collectively, the "Committee Group"), and various political action committees (the "PACs") that a complaint (the "Complaint") had been filed against them with the Commission. The Complaint alleges that the Committee Group violated Section 441a(f) of the Federal Election Campaign Act of 1971, as amended (the "Act"), and Section 104.14(d) of the Federal Election Commission Rules of 1983 by knowingly accepting contributions in excess of the statutory

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1 by knowingly accepting contributions in excess of the statutory
2 limits and inaccurately reporting contributions received.

3 II.

4 FACTS.

5 The Complaint essentially makes six separate allega-
6 tions of violations of 2 U.S.C. 441a(f) and 11 C.F.R. 104.14(d)
7 against the Committee Group: (1) acceptance of excessive con-
8 tributions from affiliated PACs (AFT-COPE and PACE) (see Section
9 IIIA, below); (2) failure to designate a \$1,000 contribution
10 from PACE as for the primary (see Section IIIB, below);
11 (3) designation of a \$4,425 contribution from AFT-COPE as for
12 the general election (see Section IIIC, below); (4) acceptance
13 of excessive contributions from the ACTWU (see Section IIID,
14 below); (5) improper designation of contributions from the ACTWU
15 as for the general election (see Section IIIE, below); and (6)
16 acceptance of excessive contributions from the ILGWUCC (see Sec-
17 tion IIIF, below). As discussed below, none of these allega-
18 tions are meritorious. Furthermore, even if the allegations
19 were to constitute technical violations of the Act, the Com-
20 mittee Group's good faith is obvious and precludes a finding of
21 a violation with respect to each of the allegations.

22 During the period in which the alleged violations
23 occurred, the Committee received more than 25,000 checks
24 representing total contributions of approximately \$5.5 million.
25 Despite this enormous volume and the fact that, in keeping with
26 the spirit of the Act, the Committee is staffed primarily with
27 volunteers, the Committee has been meticulous in its reporting
28 of contributions received. The Committee Group at all times

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1 demonstrated good faith and utilized its best efforts to comply
2 with the Act.

3 III.

4 THE COMMITTEE GROUP DID NOT
5 COMMIT THE VIOLATIONS ALLEGED.

6 A. The Committee Group Did Not Knowingly Accept Contributions
7 From the American Federation of Teachers Committee On
8 Political Education ("AFT-COPE") and the Political Action
9 Council Of Educators ("PACE") in Violation of 2 U.S.C.
10 § 441a(f).

11 The Complaint alleges that the Committee Group
12 violated 2 U.S.C. § 441a(f) by accepting \$11,425 from AFT-COPE
13 and PACE (see Complaint, p. 6, attached hereto as Exhibit A).
14 The Complaint further alleges that "[f]or the purposes of this
15 complaint, contributions made by AFT-COPE and its affiliated
16 separate segregated fund, PACE, are treated as contributions
17 made from a single committee in accordance with 2 U.S.C.
18 § 441a(a)(5) as implemented through 11 C.F.R. § 100.5
19 (g)(i)(B)." (See Complaint, pp. 4-5.)

20 2 U.S.C. § 441a(f) states that no candidate or
21 political committee shall knowingly accept any contribution from
22 a multicandidate political committee with respect to any elec-
23 tion in excess of \$5,000. 2 U.S.C. § 441a(a)(5) states that for
24 the purposes of these limitations, all contributions made by
25 political committees established or financed or maintained or
26 controlled by any labor organization, including any parent, sub-
27 sidiary, branch, division, department, or local unit of such
28

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1 labor organization, shall be considered to have been made by a
2 single political committee.

3 The two PACs, AFT-COPE and PACE, are not affiliated.
4 This argument is presented succinctly in the Brief of AFT, dated
5 July 23, 1984.

6 In addition, upon receipt of the Complaint, Carmen
7 Robledo, a staff member of the Brown For U.S. Senate Committee,
8 telephoned the headquarters of PACE and was informed that PACE
9 and AFT-COPE were not affiliated organizations. (See Affidavit
10 of Carmen Robledo, attached hereto as Exhibit D.) Ms. Robledo
11 also telephoned the Commission and was informed that PACE and
12 AFT-COPE were not considered affiliated organizations.

13 Even if the Commission subsequently determines that
14 PACE and AFT-COPE are affiliated, there was no possible way the
15 Committee could have ascertained this fact. The Committee used
16 every means available to it to check the status of these PACs.
17 In accordance with established procedures (see Procedures For
18 Deposits, attached hereto as Exhibit B), volunteers telephoned
19 the Commission when they received the contributions from the
20 PACs and recorded the identification number of the PACs. The
21 numbers of AFT-COPE and PACE are not the same (AFT-COPE
22 # C00028860, PACE # C00023754). Moreover, the registration
23 statements of PACE do not list AFT-COPE as an affiliated or con-
24 nected organization. (See Exhibit C.) Certainly, when the Com-
25 mission itself states that PACE and AFT-COPE are not affiliated,
26 the Committee cannot be expected to determine differently.
27 Because the Committee relied in good faith on all available
28 documents, the representations of the PACs involved, and the

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representations of the Commission itself, the Committee Group should not be found to be in violation of 2 U.S.C. § 441a(f) even should the Commission subsequently determine that PACE and AFT-COPE are affiliated. In reliance on the fact that PACE and AFT-COPE were not affiliated, the Committee accepted \$5,000 for the primary election from AFT-COPE, \$4,425 for the general election from AFT-COPE, and \$2,000 for the primary election from PACE. (See Exhibit E.) All of these contributions are within the limitations of 2 U.S.C. §§ 441a(a)(2)(A) and 441a(f). The Committee Group therefore did not violate 2 U.S.C. § 441a(f).

B. The Committee Treasurer Properly Designated the \$1,000 Contribution Made by PACE on April 5, 1982, As Intended For The Primary Election.

The Complaint alleges that the Committee Treasurer violated 11 C.F.R. § 104.14(d) by failing to designate whether a \$1,000 contribution made by PACE on April 5, 1982, was received for the primary or general election. (See Complaint, pp. 7-8.) This allegation is false.

11 C.F.R. § 104.14(d) states that each treasurer of a political committee, and any other person required to file any report or statement under the Act, shall be personally responsible for the accuracy of any information or statement contained in it.

The Committee clearly designated the \$1,000 contribution made by PACE on April 5, 1982, and received by the Committee on April 15, 1982, as for the primary election. (See Exhibit F.)

1 harmless error. The reporting in no way affects the
2 contribution limits.

3 Moreover, 2 U.S.C. § 432(h)(2)(i) states that "[w]hen
4 the treasurer of a political committee shows that best efforts
5 have been used to obtain, maintain, and submit the information
6 required by this Act for the political committee, any report or
7 any records of such committee shall be considered in compliance
8 with this Act . . ." Because there was no way the Committee
9 could have known AFT-COPE had split the contribution, the report
10 of the Committee is in compliance with the Act.

11 D. The Committee Group Did Not Knowingly Accept Contributions
12 In Excess of Statutory Limits From the Amalgamated Clothing
13 and Textile Workers Union Political Action Committee (the
14 "ACTWU-PAC").

15 The Complaint alleges that the Committee Group
16 violated 2 U.S.C. § 441a(f) by accepting \$6,000 for the primary
17 election from ACTWU-PAC. (See Complaint, p. 9.) 2 U.S.C.
18 § 441a(f) states that no candidate or political committee shall
19 knowingly accept any contribution from a muticandidate political
20 committee with respect to any election in excess of \$5,000.

21 ACTWU-PAC made the initial \$5,000 contribution on
22 May 17, 1982, designated for the primary election. This
23 contribution was received by the Committee on May 27, 1982, and
24 properly reported. (See Exhibit K.)

25 ACTWU-PAC made a second contribution on October 18,
26 1982: \$1,000 for the general election. Due to a clerical
27 error, this contribution was originally reported by ACTWU-PAC as
28 being made for the primary election. ACTWU-PAC has since

1 amended its report to show the contribution as made for the
2 general election. (See Exhibit L.)

3 The Committee properly reported the \$1,000 contribu-
4 tion as received for the general election. 11 C.F.R.
5 § 110.2(a)(1) states that the term "with respect to any elec-
6 tion" has the same meaning for muticandidate committees as
7 11 C.F.R. § 110.1(a)(2). 11 C.F.R. § 110.1(a)(2)(ii)(B) states
8 that contributions not designated in writing for a particular
9 election shall be considered for the general election if made
10 after the date of the primary election. The \$1,000 contribution
11 of October 18, 1982, was not designated in writing as for a
12 particular election (see Exhibit M, attached hereto, and
13 Exhibit 2A of the reply of ACTWU-PAC), was made after the
14 primary election, and so was properly accepted and reported by
15 the Committee as received for the general election. (See
16 Exhibit N). The Committee Group therefore received only \$5,000
17 for the primary election from ACTWU-PAC and did not violate 2
18 U.S.C. § 441a(f).

19 E. The Committee Treasurer Properly Designated the \$1,000
20 Contribution Made by ACTWU-PAC on October 18, 1982, as
21 Received for the General Election.

22 The Complaint alleges that the Committee Treasurer
23 violated 11 C.F.R. § 104.14(d) by reporting a contribution of
24 \$1,000 made by ACTWU-PAC on May 27, 1982, as received for the
25 general election, when the ACTWU-PAC's report to the Commission
26 designated it as for the primary election. (See Complaint,
27 p.10.) As shown above in Section III D, the Committee Treasurer
28 correctly reported the contribution as received for the general

1 election. 11 C.F.R. § 104.14(d) states that each treasurer of a
2 political committee, and any other person required to file any
3 report or statement under the Act shall be personally respon-
4 sible for the accuracy of any information or statement contained
5 in it. The ACTWU-PAC is therefore responsible for its reporting
6 errors, not the Committee Treasurer.

7 F. The Committee Group Did Not Knowingly Receive Contributions
8 From the International Ladies' Garment Workers' Union
9 Campaign Committee (the "ILGWUCC") in Excess of the
10 Statutory Limits.

11 The Complaint alleges that the Committee Group
12 violated 2 U.S.C. § 441a(f) by accepting contributions from the
13 ILGWUCC totalling \$6,000 for the general election. (See Com-
14 plaint, p.11.) 2 U.S.C. § 441a(f) states that no candidate or
15 political committee shall knowingly accept any contribution from
16 a multicandidate political committee with respect to any elec-
17 tion in excess of \$5,000.

18 The Committee received a contribution of \$4,000,
19 designated for the general election, from the ILGWUCC on Septem-
20 ber 29, 1982. This contribution was properly recorded as a con-
21 tribution from the International Ladies' Garment Workers' Union.
22 (See Exhibit O.)

23 The Committee received two additional contributions
24 of \$1,000 each from the ILGWUCC on October 8, 1982. These con-
25 tributions were also designated for the general election. Due
26 to a clerical error, these contributions were reported as being
27 received from the ILGWU. (See Exhibit P.) The fact that the
28 previous contribution had been recorded as received from the

1 International Ladies' Garment Workers' Union, rather than the
2 abbreviated ILGWU, facilitated the clerical error that misled
3 the Committee Group into believing that the \$4,000 contribution
4 and the two \$1,000 contributions were received from two separate
5 organizations and, therefore, were within the \$5,000 contribu-
6 tion limit.

7 When the Committee Group received the Complaint, they
8 immediately investigated the matter and determined that an error
9 had indeed been made. The Committee thereupon refunded the
10 excess contribution of \$1,000. (See Exhibit Q.) The refund
11 will appear on the statement filed with the Commission for this
12 period.

13 As discussed above, 2 U.S.C. § 432(h)(2)(i) states
14 that when the treasurer of a political committee shows that best
15 efforts have been used to obtain, maintain, and submit the
16 information required by this Act for the political committee,
17 any report or records of such committee shall be considered in
18 compliance with this Act. The actions of the Committee,
19 detailed below, evidence such "best efforts," and, therefore,
20 the receipt of the excess contribution of \$1,000 should not
21 be found to constitute a violation of 2 U.S.C. § 441a(f).

22 The Committee has received more than 25,000 checks
23 representing total contributions of approximately \$5.5 million,
24 and in the regular course of its business voluntarily and
25 promptly refunded hundreds of checks totalling approximately
26 \$100,000 in questionable contributions. The total amount of the
27 contributions in question in this Complaint is only \$8,425. The
28 amount of the excess ILGWUCC contribution is only \$1,000. The

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magnitude of the total contributions in comparison to the small amount of disputed contributions is itself evidence of the efforts expended by the Committee to comply with the Act.

Mr. Pines became Treasurer of the Committee on August 1, 1981. Shortly thereafter, a memorandum was prepared to establish Committee procedures to ensure compliance with federal and state laws. (See Exhibit B). These procedures are further evidence of the best efforts expended by the Committee.

In order to further ensure compliance with the Act, the Committee retained the services of an outside accountant and auditor, Jules Glazer, who is an expert on state and federal campaign reporting laws, and a full-time internal bookkeeper, Toni Kendall, who is familiar with the Act's restrictions on campaign contributions. Furthermore, Mr. Pines himself, in his tenure as City Attorney of Los Angeles, became quite familiar with the campaign reporting and contribution laws. (See Affidavit of Burt Pines, attached hereto as Exhibit R; unsigned; signed affidavit will be submitted under separate cover.) The retention of these experts is still further evidence of the good faith and best efforts used by the Committee to ensure compliance with the Act.

Because the excess contribution was accepted due to a bookkeeping error, because the contribution has been refunded, and because the Committee Group has at all times demonstrated its good faith and best efforts to comply with the Act, the Committee did not violate 2 U.S.C. § 441a(f).

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IV.

EDMUND G. BROWN, JR. AND THE COMMITTEE ARE NOT
LIABLE FOR ANY ALLEGED VIOLATION OF 11 C.F.R. § 104.14(d).

The Complaint alleges that Edmund G. Brown, Jr. and the Committee violated 11 C.F.R. § 104.14(d) by: 1) failing to designate the \$1,000 contribution made by PACE on April 5, 1982, as received for the primary election; 2) misrepresenting the \$4,425 contribution made by AFT-COPE on May 26, 1982, as received for the general election; and 3) misrepresenting the \$1,000 contribution made by ACTWU-PAC on October 8, 1982, as received for the general election.

Each of these allegations has been refuted above. In addition to the arguments set forth in Sections III B, C, and E, Edmund G. Brown, Jr. and the Committee cannot be held liable as a matter of law under 11 C.F.R. § 104.14(d). 11 C.F.R. § 104.14(d) states that

"Each treasurer of a political committee, and any other person required to file any report or statement under these regulations and under the Act, shall be personally responsible for the timely and complete filing of the report or statement and for the accuracy of any information or statement contained in it." 11 C.F.R. § 104.14(d) (emphasis added).

This rule was promulgated in conjunction with amended 2 U.S.C. § 434(a) which removed the requirement that a candidate file a report of receipts and expenditures. Because the treasurer of a political committee is the only person required to report under 11 C.F.R. Part 104 (11 C.F.R. § 104.1(a)), Edmund G. Brown, Jr.

1 and the Committee are not responsible for the information con-
2 tained in the reports. Therefore, even if the reports were
3 inaccurate, which they are not, the treasurer would be respon-
4 sible for the inaccuracies, not Edmund G. Brown, Jr. or the Com-
5 mittee itself. For this reason, these allegations must be dis-
6 missed with respect to Edmund G. Brown, Jr. and the Committee.

7 V.

8 CONCLUSION.

9 The Committee Group has continually demonstrated its
10 best efforts to comply with all provisions of the Act. The Com-
11 plaint alleges six violations of the Act by the Committee Group.
12 These allegations were each completely meritless: the Committee
13 Group had no way of knowing that AFT-COPE and PACE might be
14 affiliatated, if in fact, they are; the Committee Treasurer cor-
15 rectly designated the \$1,000 contribution from PACE as for the
16 primary election; the Committee Treasurer properly designated
17 the \$4,425 contribution from AFT-COPE as for the general elec-
18 tion; the two complaints regarding the \$1,000 contribution from
19 ACTWU-PAC were due to clerical errors by the PACs, not by the
20 Committee Group, and were subsequently corrected; and the \$1,000
21 excess contribution from ILGWUCC has been refunded.

22 There is no factual dispute with respect to five of
23 the six issues here: the Committee Group received clearance
24 from both the FEC and the unions involved and therefore
25 exhibited prima facie good faith with respect to the PACE and
26 AFT-COPE contributions; the Committee's records clearly show
27 correct designation of the \$1,000 contribution from PACE; the
28 Committee's records correctly designate the contribution from

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1 AFT-COPE of \$4,425 as received for the general election; and the
2 Committee records are correct with respect to the two complaints
3 regarding the \$1,000 contribution from ACTWU-PAC.

4 The only conceivable factual dispute would arise with
5 respect to the ILGWUCC contribution, where the Committee clearly
6 made clerical errors.

7 In light of the actual factual issues involved, the
8 Committee Group respectfully requests that the Commission find
9 that there is no reason to believe a violation occurred.

10 The purpose of the Act is to ensure the independence
11 of our political system from large contributors. The Act was
12 never intended, however, to be used to punish innocent clerical
13 errors. It should not be used to do so in the present matter.
14 The Committee Group, therefore, respectfully requests that the
15 Commission find no reason to believe that a violation of
16 2 U.S.C. § 441a(f) or 11 C.F.R. § 104.14(d) has occurred and
17 take no further action in this matter.

18 Respectfully submitted,

19 REAVIS & McGRATH
20 A Partnership Including
21 Professional Corporations

22 By: 
23 Roger D. Loomis, Jr.

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Index to Exhibits

- Exhibit A: Complaint filed with the Federal Election Commission on May 31, 1984, by James Edward Antosh (MUR 1716).
- Exhibit B: Procedures for Brown For U.S. Senate Deposits.
- Exhibit C: Registration Statements filed by the Political Action Council of Educators ("PACE").
- Exhibit D: Affidavit of Carmen Robledo.
- Exhibit E: Report of contributions received by the Brown for U.S. Senate Committee (the "Committee") from the American Federation of Teachers Committee On Political Education ("AFT-COPE") and PACE.
- Exhibit F: Designation by the Committee of \$1,000 contribution from PACE, dated April 15, 1982, as received for primary election.
- Exhibit G: Copy of \$5,000 check dated May 26, 1982, from AFT-COPE to the Committee.
- Exhibit H: AFT-COPE report of \$5,000 contribution dated May 26, 1982.
- Exhibit I: Committee report of receipt of \$5,000 contribution from AFT-COPE on June 5, 1982.
- Exhibit J: AFT-COPE and Committee reports of \$4,425 contribution dated August 12, 1982.
- Exhibit K: Committee report of receipt of \$5,000 contribution on May 27, 1982, from Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC").
- Exhibit L: Amended report of ACTWU-PAC designating \$1,000 contribution of October 18, 1982, as intended for the general election.
- Exhibit M: Copy of \$1,000 check dated October 18, 1982 from ACTWU-PAC.

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- Exhibit N: Committee report of receipt of \$1,000 contribution on November 4, 1982, from ACTWU-PAC.
- Exhibit O: Committee report of receipt of \$4,000 on September 28, 1982, from the International Ladies' Garment Workers' Union Campaign Committee ("ILGWUCC").
- Exhibit P: Committee report of receipt of two \$1,000 contributions on October 8, 1982, from the ILGWUCC.
- Exhibit Q: Copy of refund check for \$1,000 from the Committee to the ILGWUCC.
- Exhibit R: Affidavit of Burt Pines.

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

James Edward Antosh
13 Gilpin
Shawnee, Oklahoma 74801

Complainant,

v.

Edmund G. Brown, Jr.; Brown for
U.S. Senate; American Federation
of Teachers, Committee on
Political Education and its
affiliated separate segregated
fund, Political Action Council
of Educators; Amalgamated
Clothing and Textile Workers
Union Political Action Committee;
International Ladies Garment
Workers Union Campaign Committee,
and all the Committees'
treasurers,

Respondents.

Complaint
MUR No. 1716

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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, Edmund G. Brown, Jr.; Brown for U.S. Senate; American Federation of Teachers, Committee on Political Education ("AFT-COPE") and its affiliated separate segregated fund ("SSF"), Political Action Council of Educators ("PACE"); Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC"); International Ladies Garment Workers Union Campaign Committee ("ILGWUCC") 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) during either the general or the primary election cycles.

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. Edmund G. Brown, Jr.,

1125 W. Sixth Street
Los Angeles, California 90017 and,

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630 Shatto Place
Los Angeles, California 90005.

- b. Burt Pines, individually and in his capacity as treasurer of Brown for U.S. Senate,

1125 W. Sixth Street
Los Angeles, California 90017 and,

630 Shatto Place
Los Angeles, California 90005.

- c. Jules Glazer, individually and in his capacity as treasurer of Brown for U.S. Senate,

1125 W. Sixth Street
Los Angeles, California 90017 and,

630 Shatto Place
Los Angeles, California 90005.

- d. Brown for U.S. Senate,

1125 W. Sixth Street
Los Angeles, California 90017 and,

630 Shatto Place
Los Angeles, California 90005.

- e. Robert G. Porter, individually and in his capacity as treasurer of American Federation of Teachers, Committee on Political Education,
11 Dupont Circle, N.W.
Washington, D.C. 20036.

- f. American Federation of Teachers, Committee on Political Education,
11 Dupont Circle, N.W.
Washington, D.C. 20036.

- g. William Zimmerman, individually and in his capacity as treasurer of Political Action Council of Educators,
2511 W. 3rd Street
Los Angeles, California 90057.

- h. Political Action Council of Educators,
2511 W. 3rd Street
Los Angeles, California 90057.

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- i. George Solomons, individually and in his capacity as treasurer of Amagamated Clothing and Textile Workers Union Political Action Committee,
15 Union Square
New York, New York 10003.
 - j. Amagamated Clothing and Textile Workers Union Political Action Committee,
15 Union Square
New York, New York 10003.
 - k. Lawrence Dock, individually and in his capacity as treasurer of International Ladies Garment Workers Union Campaign Committee,
1710 Broadway
New York, New York 10019.
 - l. International Ladies Garment Workers Union Campaign Committee,
1710 Broadway
New York, New York 10019.

III. LIABILITY

3. Liability may be imposed upon the candidate, Edmund G. Brown, Jr.; Brown for U.S. Senate; AFT-COPE and its affiliated SSF, PACE; ACT:U-PAC; and ILGWUCC pursuant to 2 U.S.C. §441a(a) which establishes the \$5,000.00 (FIVE THOUSAND DOLLAR) 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 AFT-COPE and its affiliated SSF, PACE, 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 primary election or an excess of \$5,000.00 (FIVE THOUSAND DOLLARS) for the 1982 federal general in which Edmund G. Brown, Jr. 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 Edmund G. Brown, Jr.; Brown for U.S. Senate; AFT-COPE and its affiliated SSF, PACE; and ACTWU-PAC filed for the 1982 federal primary election; and which Edmund G. Brown, Jr., Brown for U.S. Senate and ILGWUCC filed for the 1982 federal general election.

7. For the 1982 federal primary election, excessive funds were contributed to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer by AFT-COPE and its treasurer; PACE and its treasurer; and ACTWU-PAC and its treasurer. For the 1982 federal general election, excessive funds were contributed to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer by ILGWUCC and its treasurer.

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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
BROWN FOR U.S. SENATE IN THE
1982 FEDERAL PRIMARY AND GENERAL ELECTIONS

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, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal primary election from AFT-COPE and its affiliated SSF, PACE, in the amount of \$11,425.00 (ELEVEN THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLARS).

10. Candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, for the 1982 federal primary election, accepted contributions from AFT-COPE and its affiliated SSF, PACE, in the following amounts:

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<u>Date Received</u>	<u>Amount</u>	<u>Contributor</u>	<u>F.E.C. Microfilm Location</u>
7/14/81	\$1,000.00	PACE	82020032018
4/15/82 oil	\$1,000.00	PACE	82020071976 - No signature
6/5/82	\$5,000.00	AFT-COPE	82020103644
8/18/82	\$4,425.00	AFT-COPE	82020154239 - For primary per AFT-COPE
Total	\$11,425.00		

11. A running total of the amount of contributions received from AFT-COPE and its affiliated SSF, PACE, would have put on notice Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer that they had received \$2,000.00 (TWO THOUSAND DOLLARS) on April 15, 1982. On that date, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer were only permitted to accept an additional contribution of \$3,000.00 (THREE THOUSAND 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.

12. PACE and its treasurer failed to designate whether the \$1,000.00 (ONE THOUSAND DOLLAR) contribution made on April 5, 1982 was intended for the primary or the general election. (See F.E.C. Microfilm # 32032421201). However, the contribution was made more than two months before the California Congressional primary election which was held on June 8, 1982. Therefore, the contribution is considered a contribution for the primary election in accordance with 11 C.F.R. §110.1(a)(2)(ii)(A).

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In violation of 11 C.F.R. §104.14(d), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer failed to designate whether the contribution was for the primary or the general election. (See F.E.C. Microfilm # 8200071976). 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 or statement contained therein."

13. Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer failed to accurately report the \$4,425.00 (FOUR THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLAR) contribution of May 26, 1982 which was designated by AFT-COPE as a contribution for the primary election. (See F.E.C. Microfilm # 82032404238). In violation of 11 C.F.R. §104.14(d), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer reported it as a contribution for the general election. (See F.E.C. Microfilm # 82020154239). 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 or statement contained therein." Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer knowingly misreported the contribution in order to accept contributions in excess of the statutory limit.

14. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable

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amendments, which Respondents filed with the Federal Election Commission, Complainant believes that candidate for public office, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal primary election from ACTWU-PAC in the amount of \$6,000.00 (SIX THOUSAND DOLLARS).

15. Candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, for the 1982 federal primary election, accepted contributions from ACTWU-PAC in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>F.E.C. Microfilm Location</u>
5/27/82	\$5,000.00	82020103644
11/4/82	<u>\$1,000.00</u>	82020191641
Total	\$6,000.00	

16. A running total of contributions from ACTWU-PAC would have put on notice Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer that they had received \$5,000.00 (FIVE THOUSAND DOLLARS) on May 27, 1982. On that date, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer could no longer lawfully accept any contributions from ACTWU-PAC. In violation of 2 U.S.C. §441a(f), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer accepted a contribution from this contributor in the amount of \$1,000.00 (ONE THOUSAND DOLLARS). This amount

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exceeded the statutory monetary ceiling by \$1,000.00 (ONE THOUSAND DOLLARS).

17. Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer failed to accurately report the \$1,000.00 (ONE THOUSAND DOLLAR) contribution of October 18, 1982 which was designated by ACTWU-PAC as a contribution for the primary election. (See F.E.C. Microfilm # 82032583602). In violation of 11 C.F.R. §104.14(d), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer reported it as a contribution for the general election. (See F.E.C. Microfilm # 82020191641). 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 or statement contained therein." Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer knowingly misreported the contribution in order to accept contributions in excess of the statutory limit.

18. 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, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal general election from ILGWUC in the amount of \$6,000.00 (SIX THOUSAND DOLLARS).

19. Candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, for the 1982 federal general election, accepted contributions from ILGWUC in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>F.E.C. Microfilm Location</u>
9/29/82	\$4,000.00	82020154242
10/8/82	\$1,000.00	82020154504
10/8/82	<u>.\$1,000.00</u>	82020154504
Total	\$6,000.00	

20. A running total of contributions from ILGWUC would have put on notice Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer that they had received \$4,000.00 (FOUR THOUSAND DOLLARS) on September 29, 1982. On that date, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer were only permitted to accept an additional contribution of \$1,000.00 (ONE THOUSAND DOLLARS). In violation of 2 U.S.C. §441a(f), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer accepted two contributions from this contributor in the amounts of \$1,000.00 (ONE THOUSAND DOLLARS). This amount exceeded the statutory monetary ceiling by \$1,000.00 (ONE THOUSAND DOLLARS).

VI. VIOLATIONS OF THE F.E.C.A. BY
AFT-COPE AND PACE IN THE
1982 FEDERAL PRIMARY ELECTION

21. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable

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amendments, which Respondents filed with the Federal Election Commission, the Complainant believes that AFT-COPE and its affiliated SSF, PACE, for the 1982 federal primary election contributed to candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer a total of \$11,425.00 (ELEVEN THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLARS).

22. AFT-COPE and PACE contributed the following amounts:

a. On July 2, 1981, PACE contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 81032092497).

b. On April 5, 1982, PACE contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032421201).

c. On May 26, 1982, AFT-COPE contributed \$5,000.00 (FIVE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032361583).

d. On May 26, 1982, AFT-COPE contributed \$4,425.00 (FOUR THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLARS). (See F.E.C. Microfilm # 82032404233).

23. A running total of contributions made to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer would have put on notice AFT-COPE and its affiliated SSF, PACE, that as of April 5, 1982, they had contributed \$2,000.00 (TWO THOUSAND DOLLARS) and that they could only contribute an additional \$3,000.00 (THREE THOUSAND DOLLARS) if they 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 DOLLAR) contribution and a \$4,425.00 (FOUR THOUSAND

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FOUR HUNDRED TWENTY-FIVE DOLLAR) contribution was made to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer. This amount exceeded the statutory monetary ceiling by \$6,425.00 (SIX THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLARS).

24. PACE and its treasurer failed to accurately report the \$1,000.00 (ONE THOUSAND DOLLAR) contribution of July 2, 1981 and the \$1,000.00 (ONE THOUSAND DOLLAR) contribution of April 5, 1982. In violation of 11 C.F.R. §104.14(d), PACE and its treasurer failed to designate whether the contributions were intended for the primary or the general election. (See F.E.C. Microfilm #s 81032092497 and 82032421201). Since the contributions were made before the California Congressional primary election which was held on June 8, 1982, they are considered contributions for the primary election in accordance with 11 C.F.R. §110.1(a)(2)(ii)(A). 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 or statement contained therein."

VII. VIOLATIONS OF THE F.E.C.A. BY
ACTWU-PAC IN THE
1982 FEDERAL PRIMARY ELECTION

25. 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 ACTWU-PAC for the 1982 federal primary election contributed to candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer a total of \$6,000.00 (SIX THOUSAND DOLLARS).

26. ACTWU-PAC contributed the following amounts:

a. On May 17, 1982, ACTWU-PAC contributed \$5,000.00 (FIVE THOUSAND DOLLARS). (See F.E.C. Microfilm # 8203233536).

b. On October 18, 1982, ACTWU-PAC contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032583602).

27. A running total of the amount contributed to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer by ACTWU-PAC would have put it on notice that as of May 17, 1982, it had contributed \$5,000.00 (FIVE THOUSAND DOLLARS). In violation of 2 U.S.C. §441a(a)(2)(A), ACTWU-PAC made a \$1,000.00 (ONE THOUSAND DOLLAR) contribution on October 18, 1982, which exceeded the \$5,000.00 (FIVE THOUSAND DOLLAR) ceiling by \$1,000.00 (ONE THOUSAND DOLLARS).

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VII. VIOLATIONS OF THE F.E.C.A.
BY
ILGWUCC
IN THE
1982 FEDERAL GENERAL ELECTION

28. 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 ILGWUCC for the 1982 federal general election contributed to candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer a total of \$6,000.00 (SIX THOUSAND DOLLARS).

29. ILGWUCC contributed the following amounts:

a. On August 16, 1982, ILGWUCC contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032435073).

b. On August 27, 1982, ILGWUCC contributed \$4,000.00 (FOUR THOUSAND DOLLARS). (See F.E.C. Microfilm # 82033435081).

c. On October 6, 1982, ILGWUCC contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032500143).

30. A running total of the amount contributed to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer by ILGWUCC would have put it on notice that as of August 27, 1982, it had contributed \$5,000.00 (FIVE THOUSAND DOLLARS). In violation of 2 U.S.C. §441a(a)(2)(A), ILGWUCC made a \$1,000.00 (ONE THOUSAND DOLLAR)

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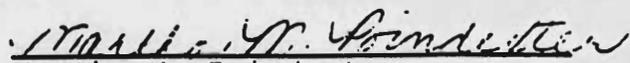
contribution on October 6, 1982, which exceeded the \$5,000.00 (FIVE THOUSAND DOLLAR) ceiling by \$1,000.00 (ONE THOUSAND DOLLARS).

IX. CONCLUSION

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

32. 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

June 1, 1984

86040503724

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 21st day of May 1984.

Merion K. [Signature]
Notary Public

My Commission expires:
My Commission Expires Sept. 17, 1986

95040580725

DESIGNATION OF COUNSEL

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

Nov. 21 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

86040563725

PROCEDURES FOR BROWN FOR U.S. SENATE DEPOSITS.

1. LOOK AT THE CHECKS FOR ANY OBVIOUS CORPORATE CHECKS: CORP., OR A PROFESSIONAL CORPORATION, AND CASHIER CHECKS.
2. ANY CHECKS THAT ARE BUSINESS CHECKS; CALL THE SECRETARY OF STATE'S OFFICE AND CHECK ON CORPORATE LISTING. RECORD THE DATE, THE LAST NAME OF THE PERSON YOU SPOKE WITH AND YOUR INITIALS ON THE BLUE BANK DEPOSIT CARD. NEXT, CALL THE OWNER OF THE BUSINESS AND ASK IF THE CO. IS INCORPORATED. NOTE THE LAST NAME OF THE PERSON YOU SPOKE WITH ON THE BLUE CARD. AT THIS TIME FIND OUT WHO THE INDIVIDUAL IN THE CO. IS, WHO IS RESPONSIBLE FOR THE CONTRIBUTION, AND NOTE THE TRANSMITTAL ON THE BLUE CARD. (THIS IS THE PERSON TO WHOM THE CONTRIBUTION IS BEING CREDITED TO.)

IF THE CO. IS A PARTNERSHIP SEND THE APPROPRIATE FOLLOW UP DOCUMENTATION TO THE CO. NOTE ON THE BLUE CARD THE DAY WHEN IT WAS MAILED.

WHEN ALL OF THE ABOVE INFORMATION IS COMPLETE, NOTE S.S./ON.C. IN THE LEFT HAND CORNER OF THE CHECK. (SECTY. STATE/OWNER, NOT CORP.)

3. OTHER CHECKS: MAKE SURE THAT THE SIGNATURE ON THE CARD IS THE NAME TO WHICH THE CONTRIBUTION IS ACCREDITED.
4. CALL FEC ON ALL PAC CHECKS, AND RECORD THE FEC ID NUMBER ON THE BLUE CARD AND ON THE CHECK.
5. CROSS REFERENCE CHECKS OVER \$750.00 WITH THE BLUE CARDS. PULL THE FIRST PERIOD BLUE CARD AND NOTE THE AGGEGATE AMOUNT. CROSS REFERENCE UNDER \$750.00 WITH THE "OVER 1,000.00 CONTRIBUTER LIST."
6. AT THIS TIME SEND THE NECESSARY DOCUMENTATION TO THE CONTRIBUTER, IE: PARTNERSHIP LETTERS, MORE INFO. NEEDED LETTERS., ETC.
7. RETURN THE CHECKS TO TONI FOR FINAL CHECK.
8. XEROX TWO COPIES OF THE CHECKS, AND BANK DEPOSIT SLIPS. SEND ONE COPY TO BURT PINES FOR FINAL APPROVAL BEFORE CHECKS ARE DEPOSITED.

80040503727

UNITED STATES SENATE

Office of the Secretary of the Senate
Washington, D.C. 20510

REGISTRATION FORM AND STATEMENT OF ORGANIZATION FOR POLITICAL COMMITTEES

**SUPPORTING CANDIDATES FOR U.S. SENATE AND ANTICIPATING CONTRIBUTIONS
OR EXPENDITURES IN EXCESS OF \$1,000 IN ANY CALENDAR YEAR**

SEE REVERSE SIDE FOR ADDITIONAL INSTRUCTIONS
ALL QUESTIONS MUST BE ANSWERED FOR NEW REGISTRATIONS

1. Full name of committee: Political Action Council of Educators
Address: 234 Loma Drive, Los Angeles, CA 90026

Telephone number: 213-483-8611

New Registration Registration Amendment

<small>Identification Number Assigned by Secretary</small> S 1930

2. Affiliated or connected organizations:

Name of affiliated or connected organization	Mailing address and ZIP code	Relationship
United Teachers-Los Angeles	234 Loma Drive Los Angeles, CA 90026	Membership generally similar

3. Area, Scope and Jurisdiction of the Committee:

- (a) Will this committee operate in more than one State? No
- (b) Will it operate on a statewide basis in one State? No
- (c) Will it primarily support candidates seeking State or local office? Yes
- (d) Will it support a candidate for the U.S. Senate in an aggregate amount in excess of \$1,000 during the calendar year? No

4. (a) If the committee is supporting individual candidates for the U.S. Senate, list each candidate by name, address, office sought, and party affiliation:

Full names of candidates	Mailing address and ZIP code	State	Party
Alan Cranston	6420 Wilshire Blvd., Los Angeles, CA 90048	Calif.	D

(b) List by name, address, office sought, and party affiliation, any candidate for other Federal office, or for any other office, that this committee is supporting:

Full names of candidates	Mailing address and ZIP code	Office sought	Party
Arline Matthews	7118 Topanga Canyn. Blvd. C.P, 91303	20 CD	D
Robert White	12316 E. Firestone Blvd. Norwalk, 90650	33 CD	D
Edward Roybal	300 N. L. A. St. Rm7110 L. A. 90012	25 CD	D
Henry Waxman	6022 W. Pico Blvd., No. 7, L. A 90035	24 CD	D

*Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate box above when information is continued on separate page(s).
Revised February 1974

040583726

5. If this committee is supporting the entire ticket of a party, give name of party: _____

6. Identify by name, address and position, the committee's custodian of books and accounts:

Full name	Mailing address and ZIP code	Committee title or position
Betty Karnette	2805 Chestnut Avenue Long Beach, CA 90806	Treasurer Office telephone No. 483-8611

7. List by name, address and position, other principal officers of the committee, including the chairman and treasurer if not identified in Question 6 above and members of the finance committee, if any:

Full name	Mailing address and ZIP code	Committee title or position
Hugh Gottfried	3720 Cardiff Ave. Apt. 5 Los Angeles, CA 90035	Chairman

8. Does this committee plan to stay in existence beyond the current calendar year? YES If so, how long? unknown

9. In the event of dissolution, what disposition will be made of residual funds? _____
to be determined by Committee at Time of dissolution

10. List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of bank, repository, etc.	Mailing address and ZIP code
Security Pacific National Bank	1221 West Fifth Street Los Angeles, CA 90017

11. List all reports (other than reports required by this Act) required to be filed by this committee with States and local jurisdictions, and the names, addresses, and positions of the recipients of the reports:

Report title	Dates required to be filed	Name and position of recipient	Mailing address and ZIP code
Committees Campaign Statement Form Form 703	10-29-74	Secretary of State, Calif.	Box 1467 Sac. CA 95807
"	10-29-74	San Francisco Registrar V	155 City Hal. S. F. CA94
"	10-29-74	L. A. Registrar Voters	808 N. Spring L. A. CA90

*Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate box above when information is continued on separate page(s).

VERIFICATION BY OATH OR AFFIRMATION OF TREASURER

State of California

County of Los Angeles SS.

I, Betty Karnette, being duly sworn, depose (affirm) and say that the information in this Registration Form and Statement of Organization is complete, true, and correct.

Betty Karnette
(Signature of Treasurer of Political Committee)

Subscribed and sworn to (affirmed) before me this 6th day of November, A.D. 1974



Lavesta R. Fitzgerald
(Notary Public)

My commission expires March 2, 1975

RETURN COMPLETED REPORT AND ATTACHMENTS TO:
Hon. Francis R. Valeo, Secretary of the Senate, U.S. Capitol, Washington, D.C. 20510

040503730

UNITED STATES HOUSE OF REPRESENTATIVES

Office of the Clerk
Washington, D.C.

REGISTRATION FORM AND STATEMENT OF ORGANIZATION

FOR A
POLITICAL COMMITTEE

New Registration
 Registration Amendment
I.D. # _____

SEE REVERSE SIDE FOR ADDITIONAL INSTRUCTIONS
ALL QUESTIONS MUST BE ANSWERED FOR NEW REGISTRATIONS

1. Full name of committee: Political Action Council of Educators
Mailing address and ZIP code: 234 Loma Drive, Los Angeles, CA 90026
Telephone number: 213-483-8611

2. Affiliated or connected organizations:

Name of affiliated or connected organization	Mailing address and ZIP code	Relationship
United Teachers-Los Angeles	234 Loma Drive, L. A. CA 90026	Membership generally similar

3. Area, scope and jurisdiction of the committee:

- (a) Will this committee operate in more than one State? no
- (b) Will it operate on a statewide basis in one State? no
- (c) Will it primarily support candidates seeking State or local office? yes
- (d) Will it support a candidate for the U.S. House of Representatives in an aggregate amount in excess of \$1,000 during the calendar year? yes

4. (a) If the committee is supporting individual candidates for the U.S. House of Representatives, list each candidate by name, address, office sought, and party affiliation:

Full names of candidates	Mailing address and ZIP code	State and Congressional District	Party
Arline Mathews	7118 Topanga Canyon Blvd., Canoga Park, CA 91303	20 CD	D
Robert White	12316 E. Firestone Blvd., Norwalk, Calif. 90650	33 CD	

(b) List by name, address, office sought, and party affiliation, any candidate for other Federal or public office that this committee is supporting:

Full names of candidates	Mailing address and ZIP code	Office sought	Party
Alan Cranston	6420 Wilshire Blvd., Los Angeles, CA 9004-	Senator Calif.	D

5. If this committee is supporting the entire ticket of a party, give name of party: _____

*Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate box above when information is continued on separate page (a).
Revised January 1974

04036373

<u>Full Names of Candidates</u>	<u>Mailing Address and Zip Code</u>	<u>Office Sought</u>	<u>Party</u>
Edward Roybal	300 N. Los Angeles Rm 7110 Los Angeles, CA 90012	25 CD	D
Henry Waxman	6022 W. Pico Blvd., No. 7 Los Angeles, CA 90035	24 CD	D
Tom Rees	816 S. Robertson Blvd. Los Angeles, CA 90035	23 CD	D
Yvonne Burke	4041 Marlton Avenue Los Angeles, CA 90008	28 CD	D
Alphonzo Bell	11000 Wilshire Blvd., Los Angeles, CA 90024	27 CD	R
Augustus Hawkins	300 N. Los Angeles St. Rm 3257 Los Angeles, CA 90012	29 CD	D
James Corman	14545 Frair Van Nuys, CA 91411	21 CD	D

0405837

6. Identify by name, address and position, the committee's custodian of books and accounts:

Full name	Mailing address and ZIP code	Committee title or position
Betty Karnette	2805 Chestnut Avenue Long Beach, CA 90806	Treasurer Office telephone No. <u>483-8611</u>

7. List by name, address and position of other principal officers of the committee, including the chairman and treasurer if not identified in Question 6 above and members of the finance committee, if any:

Full name	Mailing address and ZIP code	Committee title or position
Hugh Gottfried	3720 Cardiff Ave. Apt. 5 Los Angeles, CA 90034	Chairman

8. Does this committee plan to stay in existence beyond the current calendar year? If so how long? unknown

9. In the event of dissolution, what disposition will be made of residual funds?
to be determined by committee at time of dissolution

10. List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

Name of bank, repository, etc.	Mailing address and ZIP code
Security Pacific National Bank	1221 West 5th Street Los Angeles, CA 90017

11. List all reports required to be filed by this committee with States and local jurisdictions, other than reports required under this Act, the names, addresses, and positions of the recipients of the reports:

Report title	Dates required to be filed	Name and position of recipient	Mailing address and ZIP code
Committees Campaign Statement Form 703	Oct. 29	1) Sec. of State Calif. 2) San Franc. Regis. Voters 3) Los Angeles Regis. Voters	Box 1467, Sac. CA 95807 155 City Hall. S. F. CA 94101 808 N. Spring L. A. CA 90011

*Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate box above when information is continued on separate page(s).

VERIFICATION BY OATH OR AFFIRMATION OF TREASURER

State of California

County of Los Angeles ss.

I, Betty Karnette, being duly sworn, depose (affirm) and say that the information in this Registration Form and Statement of Organization is complete, true, and correct.

Betty Karnette
(Signature of Treasurer of Political Committee)

Subscribed and sworn to (affirmed) before me this 6th day of November, A.D. 19 74.



(Notary Public)
My commission expires March 2, 1975

SCHEDULE A

ITEMIZED RECEIPTS

LINE NUMBER 112
 (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)
BROWN FOR U.S. SENATE

AFT
 code

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
AMERICAN FEDERATION OF STATE COUNTY & MUNICIPAL EMPLOYEES 1625 L STREET WASHINGTON D.C. 20036	PAC # C00027623	6/14/82	2,500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
B. Full Name, Mailing Address and ZIP Code <i>843-9226</i> AMERICAN FEDERATION OF TEACHERS 2412 W. MAGNOLIA BLVD. BURBANK, CALIFORNIA 91506	PAC # C00028860	6/5/82	5,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
C. Full Name, Mailing Address and ZIP Code AMALGAMATED CLOTHING, TEXTILE 15 UNION SQUARE NEW YORK CITY, N.Y. 10003	PAC # C00005728	5/27/82	5,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
D. Full Name, Mailing Address and ZIP Code ARMENIA NATIONAL COMMITTEE 1501 VENICE BLVD. LOS ANGELES, CALIF. 90006	PAC # C00146969	6/14/82	4,000.00 4,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
E. Full Name, Mailing Address and ZIP Code BANK AMERICA FEDERAL ELECTION 1800 K STREET N.W. WASHINGTON D.C. 20006	PAC # C000147702	6/5/82	1000.00
Receipt For: <input checked="" 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 LEGISLATIVE EDUCATION ACTION BOILERMAKERS BLACKSMITHS 400 FIRST STREET N.W. WASHINGTON, D.C. 20001	PAC # C00005157	6/5/82	1,500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
G. Full Name, Mailing Address and ZIP Code BRICKLAYERS AND ALLIED CRAFTS 815 FIFTEENTH ST N.W. WASHINGTON D.C. 20005	PAC # C00003632	5/27/82	1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
SUBTOTAL of Receipts This Page (optional)			24,000
TOTAL This Period (last page this line number only)			75,615-

202-879-1400

AMERICAN FEDERATION OF TEACHERS
COMMITTEE OF POLITICAL EDUCATION

I.O.# 23-7267967 917

May 26 19 82 5:40 11

PAY TO THE
ORDER OF

Brown For U.S. Senate

\$ 5000.00

5000 DOLLARS DOLLARS

UNITED STATES FEDERAL RESERVE SYSTEM

Charles H. ...
Robert ...

⑆000917⑆ ⑆0540⑆0004⑆ 3 526 77⑆⑆

[Handwritten signature]

00004030737

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)

Brown for U.S. Senate

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Political Action Council of Educators 2511 W 3rd Street Los Angeles, CA 90057	I.D.# C00023754 Occupation	4/15/82	\$1000.
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
B. Full Name, Mailing Address and ZIP Code ROLMPAC 4900 Old Ironsides Dr. Santa Clara, CA 95050	I.D.# C00118224 Occupation	4/15/82	\$250.
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
C. Full Name, Mailing Address and ZIP Code Roos for Assembly Committee 6255 Sunset Bl. Ste. 2000 Los Angeles, Ca. 90028	I.D.# C00133686 Occupation	5/11/82	\$1000.
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
D. Full Name, Mailing Address and ZIP Code SEIU-COPE Fund PAC 2020 K. Street, N.W. Washington, D.C. 20006	I.D.# C00004036 Occupation	5/1/82	\$2000.
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
E. Full Name, Mailing Address and ZIP Code UAPAC-United Assoc. of Journeymen & Apprentices of Plumbing & Pipe-Fitting Industry 901 Massachusetts Ave. N.W. Washington, D.C. 20001	I.D.# Occupation	5/5/82	\$1000.
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
F. Full Name, Mailing Address and ZIP Code UAW V CAP 800 E. Jefferson Detroit, Mi. 48214	I.D.# C00002840 Occupation	5/17/82	\$5000.
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
G. Full Name, Mailing Address and ZIP Code United Food & Commercial Workers International Union, ABC 1775 K Street, N.W. Washington D.C. 20006	I.D.# C00002766 Occupation	5/11/82	\$4600.
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

SUBTOTAL of Receipts This Page (optional) 17,750. -

TOTAL This Period (last page this line number only)

POLITICAL ACTION COUNCIL OF EDUCATORS
(P.A.C.E.)

4A-17

234

April 5, 1982

16-356
1223

PAY TO THE
ORDER OF

Brown for U. S. Senate

\$ 1,000.00

One Thousand ----- DOLLARS

SECURITY PACIFIC NATIONAL BANK
Fifth & Bixel Branch
1221 West 5th St, Los Angeles, Calif. 90017

CCCC23754

Judy Berkowitz
Melvin Zimmern

⑆1223⑆⑆0356⑆⑆0234⑆⑆008⑆⑆042259⑆

0404056375

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 10 for
 LINE NUMBER 712
 (Use separate schedule(s) for each category of the Data: (1) 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)
BROWN FOR U.S. SENATE

A. Full Name, Mailing Address and ZIP Code	Name of Employer PAC #	Date (month, day, year)	Amount of Each Receipt This Period
ADA PAC 1411 K STREET N.W. WASHINGTON, D.C. 20005	C00112680	9/25/82	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 1,000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer PAC #	Date (month, day, year)	Amount of Each Receipt This Period
ABC ACTIVE BALLOT CLUB UNITED FOOD & COMMERCIAL WORKERS 1775 K ST. N.W. WASHINGTON D.C.	C00002766	7/14/82	4,950.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 4,950.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer PAC #	Date (month, day, year)	Amount of Each Receipt This Period
AFL-CIO COPE 815 16th ST N.W., WASHINGTON D.C. 20006	C00003806	9/28/82	4,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 4,000.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer PAC #	Date (month, day, year)	Amount of Each Receipt This Period
AMERICAN FEDERATION OF TEACHERS	C00028860	8/18/82	4,425.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 4,425.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer PAC #	Date (month, day, year)	Amount of Each Receipt This Period
ATTORNEYS CONGRESSIONAL CAMPAIGN TRUST OF ASSOC OF TRIAL LAWYERS 1050 31st ST. N.W. WASHINGTON, D.C. 20007	C00024521	7/23/82	2,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 2,000.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer PAC #	Date (month, day, year)	Amount of Each Receipt This Period
CARPENTERS LEGISLATIVE IMPROVEMENT 101 CONSTITUTION AVENUE WASHINGTON D.C. 20001	C00001016	8/3/82	5,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 5,000.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer PAC #	Date (month, day, year)	Amount of Each Receipt This Period
A.F. OF M. TEMPO P.C.C. 1500 BROADWAY NEW YORK, N.Y. 10036	C00073627	8/9/82	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 1,000.00	
SUBTOTAL of Receipts This Page (optional).....			22,375.
TOTAL This Period (last page this line number only).....			111,940.6

83040503740

9/20/82

7

8604058741

AMERICAN FEDERATION OF TEACHERS
COMMITTEE OF POLITICAL EDUCATION

965

①

August 12 1982 ¹⁵⁻⁴/₅₄₀ 11

PAY TO THE ORDER OF Brown for U. S. Senate Committee

\$ 4,425.00

4425 DOLLARS

DOLLARS

UNIONIST
Member of National Bank of Washington

Rachelle Spurr
Phila Pa

FOR

⑆000965⑆⑆0540⑆0004⑆

3 526 771⑆

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) BROWN FOR U.S. SENATE			
<input checked="" type="checkbox"/> A. Full Name, Mailing Address and ZIP Code California Chiropractic PAC 1225 8th Street Suite 550 Sacramento, CA 95814	Name of Employer PAC ID # C00115063	Date (month, day, year) 10-21-81	Amount of Each Receipt this Period \$1,550.00
	Occupation	12-8-81	\$70.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 1,620.00		
<input checked="" type="checkbox"/> B. Full Name, Mailing Address and ZIP Code Communication Workers of America COPE-FCC 1925 K Street NW Washington, D.C. 20006	Name of Employer PAC # C00002089	Date (month, day, year) 8-25-81	Amount of Each Receipt This Period \$5,000.00
	Occupation		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 5,000.00		
<input type="checkbox"/> C. Full Name, Mailing Address and ZIP Code Laborers' Political League 905 16th Street N.W. Washington, D.C. 20006	Name of Employer PAC # C00007922	Date (month, day, year) 5-30-81	Amount of Each Receipt This Period \$1,000.00
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 1,000.00		
<input type="checkbox"/> D. Full Name, Mailing Address and ZIP Code Political Action Together IBPAT 1750 NY Ave NW, Washington DC 20006	Name of Employer PAC # C00000885	Date (month, day, year) 7-14-81	Amount of Each Receipt This Period \$ 500.00
	Occupation		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 500.00		
<input type="checkbox"/> E. Full Name, Mailing Address and ZIP Code Political Action Council of Educators 1000 Island Drive Alameda, CA 94501	Name of Employer PAC # C000023754	Date (month, day, year) 7-14-81	Amount of Each Receipt This Period \$1,000.00
	Occupation		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 1,000.00		
<input checked="" type="checkbox"/> F. Full Name, Mailing Address and ZIP Code AFL-CIO Committee on Political Educ. 815 16th St. NW Washington, DC 20006	Name of Employer PAC # C00003806	Date (month, day, year) 7-28-81	Amount of Each Receipt This Period \$ 400.00
	Occupation		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 400.00		
<input checked="" type="checkbox"/> G. Full Name, Mailing Address and ZIP Code Active Ballot Club, General Fund 855 W. San Bernadino Avenue Bloomington CA 92316	Name of Employer PAC # C00002766	Date (month, day, year) 8-10-81	Amount of Each Receipt This Period \$ 400.00
	Occupation		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 400.00		
SUBTOTAL of Receipts This Page (optional)			9970.00
TOTAL This Period (last page this line number only)			

8040303743

POLITICAL ACTION COUNCIL OF EDUCATORS <i>2A-62</i>		218
(P.A.C.E.)		
F.F.C.T.O.P. COUNCIL 2174		
July 2, 1981		<u>16-356</u> 1223
PAY TO THE ORDER OF	Brown for Senate	\$ 1,000.00
One thousand and no/100		DOLLARS
SECURITY PACIFIC NATIONAL BANK 		
Fifth & Bixel Branch		
1221 West 5th St, Los Angeles, Calif. 90017		
MEMO Donation		<i>Frank Bennett</i>
⑆ 223 0356 10218 008 042259 ⑈		

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)

Brown for U.S. Senate

A. Full Name, Mailing Address and ZIP Code
 Political Action Council of
 Educators
 2511 W 3rd Street
 Los Angeles, CA 90057

Name of Employer
 I.D.# C00023754
 Occupation

Date (month,
 day, year)
 4/15/82

Amount of Each
 Receipt this Period
 \$1000.

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$

B. Full Name, Mailing Address and ZIP Code
 ROLMPAC
 4900 Old Ironsides Dr.
 Santa Clara, CA 95050

Name of Employer
 I.D.# C00118224
 Occupation

Date (month,
 day, year)
 4/15/82

Amount of Each
 Receipt This Period
 \$150.

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$

C. Full Name, Mailing Address and ZIP Code
 Roos for Assembly Committee
 6255 Sunset Bl. Ste. 2000
 Los Angeles, Ca. 90028

Name of Employer
 I.D.# C00133686
 Occupation

Date (month,
 day, year)
 5/11/82

Amount of Each
 Receipt This Period
 \$1000.

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$

D. Full Name, Mailing Address and ZIP Code
 SEIU-COPE Fund PAC
 2020 K. Street, N.W.
 Washington, D.C. 20006

Name of Employer
 I.D.# C00004036
 Occupation

Date (month,
 day, year)
 5/1/82

Amount of Each
 Receipt This Period
 \$2000.

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$

E. Full Name, Mailing Address and ZIP Code
 UAPAC-United Assoc. of Journeymen
 & Apprentices of Plumbing & Pipe-
 Fitting Industry
 901 Massachusetts Ave. N.W.
 Washington D.C. 20001

Name of Employer
 I.D.#
 Occupation

Date (month,
 day, year)
 5/5/82

Amount of Each
 Receipt This Period
 \$1000.

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$

F. Full Name, Mailing Address and ZIP Code
 UAW V CAP
 800 E. Jefferson
 Detroit, Mi. 48214

Name of Employer
 I.D.# C00002840
 Occupation

Date (month,
 day, year)
 5/17/82

Amount of Each
 Receipt This Period
 \$5000.

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$

G. Full Name, Mailing Address and ZIP Code
 United Food & Commercial Workers
 International Union, ABC
 1775 K Street, N.W.
 Washington D.C. 20006

Name of Employer
 I.D.# C00002766
 Occupation

Date (month,
 day, year)
 5/11/82

Amount of Each
 Receipt This Period
 \$4600.

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$

SUBTOTAL of Receipts This Page (optional) 17,750. -

TOTAL This Period (last page this line number only)

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

(Summary Page)

1. Name of Committee (in Full)
Political Action Council of Educators

Address (Number and Street)
2511 West 3rd Street

City, State and ZIP Code
Los Angeles, CA 90057

Check if address is different than previously reported.

2. FEC Identification Number
C00023754

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

4. TYPE OF REPORT (check appropriate boxes)

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

(b) Is this Report an Amendment?
 YES NO

SUMMARY

5. Covering Period 4-1-82 Through 6-30-82

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 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
6(a)		\$ 1,448.92
6(b)	\$ 1,668.55	
6(c)	\$ 5,117.33	\$ 5,117.33
6(d)	\$ 6,785.88	\$ 6,785.88
7	\$ 6,000.00	\$ 6,000.00
8	\$ 785.88	\$ 785.88
9	\$	
10	\$	

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

For further information, contact:

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

William Zimmerman
Type or Print Name of Treasurer

William Zimmerman
SIGNATURE OF TREASURER

8/24/82
Date

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

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

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FEC FORM 3X (3/80)

1 0 4 0 5 8 3 7 4 6

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

Name of Committee (in Full)

Political Action Council of Educators

Report Covering the Period:

From:

To:

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	5,117.33	\$8,278.08
(Memo Entry Unitemized \$ <u>5,117.33</u>)		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)		
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.)		
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)	5,117.33	\$8,278.08
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	150.14	1,346.26
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
22. INDEPENDENT EXPENDITURES (Use Schedule E)	0	\$1,745.00
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441e(d)) (Use Schedule F)		
24. LOAN REPAYMENTS MADE		
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)		
27. OTHER DISBURSEMENTS		
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	5,117.33	\$11,369.34
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d		
30. TOTAL CONTRIBUTION REFUNDS from Line 26d		
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)		
32. TOTAL OPERATING EXPENDITURES from Line 19		
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)		

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

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 Action Council of Educators			
A. Full Name, Mailing Address and ZIP Code Mel Levine for Congress 404 North Roxbury Drive #600 Beverly Hills, CA 90210	Purpose of Disbursement dinner Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 5-27-82	Amount of Each Disbursement This Period 1,000.00
B. Full Name, Mailing Address and ZIP Code Mathew Martinez for Congress 440 E. Garvey Monterey Park, CA 91754	Purpose of Disbursement dinner Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 5-27-82	Amount of Each Disbursement This Period 1,000.00
C. Full Name, Mailing Address and ZIP Code Brown for Congress Committee 13701 Riverside Dr. #600 Sherman Oaks, CA 91423	Purpose of Disbursement dinner Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 6-25-82	Amount of Each Disbursement This Period 150.00
D. Full Name, Mailing Address and ZIP Code Lehman for Congress Comm. P. O. Box 829 Fresno, CA 93712	Purpose of Disbursement dinner Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 6-17-82	Amount of Each Disbursement This Period 500.00
E. Full Name, Mailing Address and ZIP Code Esteban Torres for Congress Comm. 11717 La Plaza Norwalk Square Norwalk, CA 90650	Purpose of Disbursement dinner Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 5-27-82	Amount of Each Disbursement This Period 1,000.00
F. Full Name, Mailing Address and ZIP Code Hawkins for Congress Committee P. O. Box 6356 Washington, D. C. 20015	Purpose of Disbursement dinner Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 4-30-82	Amount of Each Disbursement This Period 300.00
G. Full Name, Mailing Address and ZIP Code Howard Berman for Congress Comm. 360 S. Kenmore #306 Los Angeles, CA 90020	Purpose of Disbursement dinner Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 5-27-82	Amount of Each Disbursement This Period 1,000.00
H. Full Name, Mailing Address and ZIP Code Brown for U. S. Senate 1125 West 3rd., Street Los Angeles, CA 90017	Purpose of Disbursement dinner Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 4-5-82	Amount of Each Disbursement This Period 1,000.00
I. Full Name, Mailing Address and ZIP Code Tackett for Congress Comm. P. O. Box 545 Mc Farland, CA 93250	Purpose of Disbursement dinner Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 4-30-82	Amount of Each Disbursement This Period 50.00
SUBTOTAL of Disbursements This Page (optional)			\$6,000.00
TOTAL This Period (last page this line number only)			

202-879-4400

AMERICAN FEDERATION OF TEACHERS
COMMITTEE OF POLITICAL EDUCATION

I.O.# 23-7267967 917

May 26 19 82 5/26 11

PAY TO THE
ORDER OF

Brown For U.S. Senate

\$ 5000.00

5000 DOLLARS DOLLARS

ENDORSE

Charles H. ...
Robert ...

⑈000917⑈ ⑆0540⑈0004⑈ 3 526 77⑈

Handwritten signature/initials

040583749

x

1. Name of Committee (in Full)

American Federation of Teachers
Committee on Political Education

Address (Number and Street)

11 Dupont Circle, N. W.

City, State and ZIP Code

Washington, D. C. 20036

Check if address is different than previously reported.

2. FEC Identification Number
C-000028860

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

OF REPORT (check appropriate boxes)

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

(b) Is this Report an Amendment?
 YES NO

SUMMARY

5. Covering Period 4/1/82 Through 6/30/82

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 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
6. (a) Cash on Hand January 1, 19 <u>82</u>		\$ 48,567.04
(b) Cash on Hand at Beginning of Reporting Period	\$ 18,777.96	
(c) Total Receipts (from Line 18)	\$ 60,587.18	\$ 66,848.10
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 79,365.14	\$ 115,415.14
7. Total Disbursements (from Line 28)	\$ 68,260.00	\$ 104,310.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 11,105.14	\$ 11,105.14
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

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

Robert G. Porter

Type or Print Name of Treasurer

Robert G. Porter

SIGNATURE OF TREASURER

August 12, 1982

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)

SCHEDULE B

ITEMIZED DISBURSEMENT

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

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)

American Federation of Teachers, Committee on Political Education

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Mike Barnes For Congress 9814 Summit Ave. Kensington, MD. 20895	\$550 Contrib. Mike Barnes MD. 8th CD US Congress Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/20/82 4/21/82	500.00 50.00
B. Full Name, Mailing Address and ZIP Code Beckes For Congress Box 425 Girard, Ohio 44420	\$300 Contrib. Mike Beckes OH. 17th CD US Congress Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/2/82	300.00
C. Full Name, Mailing Address and ZIP Code Brown For U.S. Senate 1125 W. 6th St. - 3rd Floor Los Angeles, CA. 90017	\$5,000 Contrib. Jerry Brown CA. U.S. Senate Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Prim. 5/26/82 Gen. 5/26/82	4,425.00 575.00
D. Full Name, Mailing Address and ZIP Code Burdick Campaign Committee P.O. Box 2696 Washington, D.C. 20013	\$500 Contrib. Quentin Burdick N.D. U.S. Senate Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/15/82	500.00
E. Full Name, Mailing Address and ZIP Code Phillip Burton For Congress P.O. Box 4200 San Francisco, CA. 94101	\$2,500 Contrib. Phillip Burton CA 6th CD U.S. Congress Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/26/82	2,500.00
F. Full Name, Mailing Address and ZIP Code Friends of Robert Byrd Committee 400 N. Capitol St. Suite 325 Washington, D.C. 20001	\$5,000 Contrib. Robert Byrd W.V. U.S. Senate Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/31/82	5,000.00
G. Full Name, Mailing Address and ZIP Code Lawton Chiles Campaign Fund Federal Bldg. Lakeland, Fl. 33801	\$100 Contrib. Lawton Chiles Fl. U.S. Senate Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/22/82	100.00
H. Full Name, Mailing Address and ZIP Code Clay Campaign Committee P.O. Box 912 St. Louis, MO. 63188	\$500 Contrib. William Clay MO. 1st CD U.S. Congress Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/22/82	500.00
I. Full Name, Mailing Address and ZIP Code Bill Curry for Congress Committee 116 Main Street New Britain, CT. 06051	\$1,000 Contrib. Bill Curry CT. 6th CD U.S. Congress Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/23/82	1,000.00

SUBTOTAL of Disbursements This Page (optional) 15,450.00

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 2 for
 LINE NUMBER 110
 (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)
 BROWN FOR U.S. SENATE

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
AMERICAN FEDERATION OF STATE COUNTY & MUNICIPAL EMPLOYEES 1625 L STREET WASHINGTON D.C. 20036	PAC # C00027623	6/14/82	2,500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date-\$
B. Full Name, Mailing Address and ZIP Code 843-8226 AMERICAN FEDERATION OF TEACHERS 2412 W. MAGNOLIA BLVD. BURBANK, CALIFORNIA 91506	PAC # C00028860	6/5/82	5,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date-\$
C. Full Name, Mailing Address and ZIP Code AMALGAMATED CLOTHING, TEXTILE 15 UNION SQUARE NEW YORK CITY, N.Y. 10003	PAC # C00005728	5/27/82	5,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date-\$
D. Full Name, Mailing Address and ZIP Code ARMENIA NATIONAL COMMITTEE 1501 VENICE BLVD. LOS ANGELES, CALIF. 90006	PAC # C00146969	6/14/82	4,000.00 4,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date-\$
E. Full Name, Mailing Address and ZIP Code BANK AMERICA FEDERAL ELECTION 1800 K STREET N.W. WASHINGTON D.C. 20006	PAC # C000147702	6/5/82	1000.00
Receipt For: <input checked="" 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 LEGISLATIVE EDUCATION ACTION BOILERMAKERS BLACKSMITHS 400 FIRST STREET N.W. WASHINGTON, D.C. 20001	PAC # C00005157	6/5/82	1,500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date-\$
G. Full Name, Mailing Address and ZIP Code BRICKLAYERS AND ALLIED CRAFTS 815 FIFTEENTH ST N.W. WASHINGTON D.C. 20005	PAC # C00003632	5/27/82	1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date-\$
SUBTOTAL of Receipts This Page (optional)			24,000
TOTAL This Period (last page this line number only)			75,615-

AFT
 edit

058375

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

Summarized report

(Summary Page)

<p>1. Name of Committee (in Full) American Federation of Teachers Committee on Political Education</p> <hr/> <p>Address (Number and Street) 11 Dupont Circle, N.W.</p> <hr/> <p>City, State and ZIP Code Washington, D.C. 20036</p> <hr/> <p><input type="checkbox"/> Check if address is different than previously reported.</p> <p>2. FEC Identification Number C-000028860</p> <hr/> <p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)</p>	<p>4. TYPE OF REPORT (check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input checked="" type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only) <input type="checkbox"/> Monthly Report for _____ <input type="checkbox"/> Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____ <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____ <input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>
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SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>7/1/82</u> Through <u>9/30/82</u>		
6. (a) Cash on Hand January 1, 19 <u>82</u>		\$ 48,567.04
(b) Cash on Hand at Beginning of Reporting Period	\$ 11,105.14	
(c) Total Receipts (from Line 18)	\$ 237,274.16	\$ 304,122.26
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 248,379.30	\$ 352,689.30
7. Total Disbursements (from Line 28)	\$ 242,719.07	\$ 347,029.07
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ...	\$ 5,660.23	\$ 5,660.23
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

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

For further information, contact:

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

Robert G. Porter

Type or Print Name of Treasurer

Robert G. Porter
SIGNATURE OF TREASURER

October 7, 1982
Date

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

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

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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

Name of Committee (in Full)			
American Federation of Teachers, Committee on Political Education			
A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Committee To Re-Elect Les Aucoin 5319 Southwest W. Gate Dr. Suite 222 Portland, Oregon 97228	\$250 Les Aucoin OR. 1st CD U.S. Congress Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/17/82	250.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Dick Batchelor For Congress P.O. Box 3151 Orlando, FL. 32802	\$100 Dick Batchelor Fl. 5th CD U.S. Congr. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/12/82	100.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Berman For Congress Committee 360 S. Kenmore Ave., Suite 306 L.A. CA. 90020	\$1,000 Howard Berman CA 26th CD U.S. Cong. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/12/82	1,000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Jeff Bingaman For U.S. Senate P.O. Box 5775 Sante Fe, N.M. 87502	\$2,500 Jeff Bingaman NM US Senate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/9/82 8/11/82	500.00 2,000.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Sherwood Boehlert Committee 506 Bleecker St. Utica, N.Y. 13501	\$2,000 Sherwood Boehlert N.Y. 25th CD U.S. Cong. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/13/82	2,000.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Pat Bosch For Congress Committee P.O. Box 64 Tolleson, AZ. 85353	\$100 Pat Bosch AZ 3rd CD U.S. Congress Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/27/82	100.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Barbara Boxer Campaign Committee P.O. Box 4881 S.F., CA. 94101	\$1,150 Barbara Boxer CA 6th CD U.S. Congress Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/08/82 9/08/82	1,000.00 150.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Brown For U.S. Senate 1125 W. 6th St. - 3rd Floor L.A., CA. 90017	\$5,000 CA U.S. Senate Jerry Brown Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/12/82	4,425.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Burdick Campaign Committee P.O. Box 2696 Wash., D.C. 20013	\$2,500 Quentin Burdick ND U.S. Senate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/12/82	2,500.00
SUBTOTAL of Disbursements This Page (optional)			14,025.00
TOTAL This Period (last page this line number only)			

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 10 for
 LINE NUMBER 712
 (Use separate schedule(s) for each category of the Detail: 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)
BROWN FOR U.S. SENATE

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
ADA PAC 1411 K STREET N.W. WASHINGTON, D.C. 20005	PAC # C00112680	9/25/82	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 1,000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
ABC ACTIVE BALLOT CLUB UNITED FOOD & COMMERCIAL WORKERS 1775 K ST. N.W. WASHINGTON D.C.	PAC # C00002766	7/14/82	4,950.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 4,950.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
AFL-CIO COPE 815 16th ST N.W., WASHINGTON D.C. 20006	PAC # C00003806	9/28/82	4,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 4,000.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
AMERICAN FEDERATION OF TEACHERS	PAC # C00028860	8/18/82	4,425.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 4,425.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
ATTORNEYS CONGRESSIONAL CAMPAIGN TRUST OF ASSOC OF TRIAL LAWYERS 1050 31st ST. N.W. WASHINGTON, D.C. 20007	PAC # C00024521	7/23/82	2,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 2,000.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
CARPENTERS LEGISLATIVE IMPROVEMENT 101 CONSTITUTION AVENUE WASHINGTON D.C. 20001	PAC # C00001016	8/3/82	5,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 5,000.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
A.F. OF M. TEMPO P.C.C. 1500 BROADWAY NEW YORK, N.Y. 10036	PAC # C00073627	8/9/82	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 1,000.00	
SUBTOTAL of Receipts This Page (optional)			22,375.-
TOTAL This Period (last page this line number only)			111,940.-

9/30/82

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SCHEDULE A

ITEMIZED RECEIPTS

LINE NUMBER 111
 (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)
BROWN FOR U.S. SENATE

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
AMERICAN FEDERATION OF STATE COUNTY & MUNICIPAL EMPLOYEES 1625 L STREET WASHINGTON D.C. 20036	PAC # C00027623	6/14/82	2,500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date-\$
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
AMERICAN FEDERATION OF TEACHERS 2412 W. MAGNOLIA BLVD. BURBANK, CALIFORNIA 91506	PAC # C00028860	6/5/82	5,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date-\$
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
AMALGAMATED CLOTHING, TEXTILE 15 UNION SQUARE NEW YORK CITY, N.Y. 10003	PAC # C00005728	5/27/82	5,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date-\$
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
ARMENIAN NATIONAL COMMITTEE 1501 VENICE BLVD. LOS ANGELES, CALIF. 90006	PAC # C00146969	6/14/82	4,000.00 4,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date-\$
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
BANK AMERICA FEDERAL ELECTION 1800 K STREET N.W. WASHINGTON D.C. 20006	PAC # C000147702	6/5/82	1000.00
Receipt For: <input checked="" 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
LEGISLATIVE EDUCATION ACTION BOILERMAKERS BLACKSMITHS 400 FIRST STREET N.W. WASHINGTON, D.C. 20001	PAC # C00005157	6/5/82	1,500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date-\$
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
BRICKLAYERS AND ALLIED CRAFTS 815 FIFTEENTH ST N.W. WASHINGTON D.C. 20005	PAC # C00003632	5/27/82	1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date-\$
SUBTOTAL of Receipts This Page (optional)			24,00
TOTAL This Period (last page this line number only)			75,615

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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

Name of Committee (in Full)
Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bob Shamansky for Congress Committee 101 No. High St. P.O. Box 15668 Columbus, Ohio 43215 OHIO	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	300.00
B. Full Name, Mailing Address and ZIP Code Paul Simon Congress Committee 231 West Maine, Apt. East Carbondale, Ill. 62901 ILL.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	500.00
C. Full Name, Mailing Address and ZIP Code Aukerman for Congress Committee P.O. Box 172 Providence, R.I. 02901 R.I.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	250.00
D. Full Name, Mailing Address and ZIP Code Brown for Senate Campaign 1125 West 6th St. Los Angeles, Calif. 90017 CALIF.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	1000.00
E. Full Name, Mailing Address and ZIP Code James McClure Clarke for Congress P.O. Box 7434 Asheville, No. Car. 28817 NO. CAR.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	300.00
F. Full Name, Mailing Address and ZIP Code Friends of Bob Carr 2110 East Michigan Lansing, Mich. 48912 MICH.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/22/82	2000.00
G. Full Name, Mailing Address and ZIP Code Monsma for Congress 829 North Kentview, N.E. Grand Rapids, Mich. 49505 MICH.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/22/82	2000.00
H. Full Name, Mailing Address and ZIP Code Committee to Re-elect Leo C Zeffereetti C/O Joseph F. DeFina P.O. Box 221-Red Hook Station Brooklyn, N.Y. 11231 N.Y.	Tickets Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/22/82	100.00
I. Full Name, Mailing Address and ZIP Code Offner for Congress 1507 Losey Boulevard, South LaCrosse, Wisc. 54601 WISC.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	50.00

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

10583759

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)

Enalgnated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Keep Kastenmeier in Congress P.O. Box 24236 Washington, D.C. 20024 WISC	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	200.00
Katie Hall for Congress 637 Broadway Gary, Ind. 46402 IND.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	1000.00
Major Owens for Congress Committee 1125-29 Eastern Parkway Brooklyn, N.Y. 11213 NEW YORK	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	250.00
Sam Gejdenson for Congress P.O. Box 1982 Bozrah, Conn. 06334 CONN	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	50.00
The Committee to Elect Ken Mosley P.O. Drawer 1569 Orangeburg, So. Car. 29115 SO. CAR.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	250.00
Friends of Bob Carr 2110 East Michigan Lansing, Mich. 48912 MICH	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	500.00
Robin Britt for Congress P.O. Box 222 122 East Market St. Greensboro, No. Car. 27402 NO. CAR.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	300.00
Esiason Congressional Campaign Comm. P.O. Box 72 North Granville, N.Y. 12854 NEW YORK	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	250.00
Jim Guest for U.S. Senate P.O. Box 1438- 34 Main Street Montpelier, Vermont 05602 VERMONT	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	500.00
TOTAL of Disbursements This Page (optional)			
AL This Period (last page this line number only)			

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Name of Committee (in Full)
Amalganated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Frank Harrison for Congress Committee 15 South Franklin Street Wilkes Barre, Pa. 18711 PENNA	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	300.00
Terry Mann for Congress 731 Madison Avenue Covington, Kentucky 41011 KY.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	200.00
Don Mills for U.S. Congress Box 1124 Frankfort, Kentucky 40602 KY.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	250.00
Committee to Re-elect Wyche Fowler 207 C Street, S. E. Washington, D. C. 20003 GA.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/28/82	300.00
James J. Florio for Congress Committee P O Box 8028, Southwest Station Washington, D. C. 20024 N.J.	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/22/82	250.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period

J. TOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only) **11,100.00**

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)

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Action Committee for Rural Electrification 1800 Massachusetts Ave. N.W. Washington D.C. 20036		10-22-82	\$1,500.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 1500.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
ACTWU PAC 15 Union Square New York, NY 10003		11-4-82	\$1,000.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 1,000.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
American Democratic PAC 207 Pennsylvania Ave. S.E. Washington D.C. 20003		10-28-82	\$100.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 100.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
American Federation of Gov't Employees 1325 Massachusetts Ave. N.W. Washington D.C. 20005		10-28-82	\$3,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 5,000.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
American President Lines LTD PAC 1950 Franklin St. Oakland, Ca. 94612		10-22-82	\$500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 500.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Annheuser Busch PAC One Busch Place St. Louis, MO. 63118		10-25-82	\$2,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 2000.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
AYLA PAC 515 So. Flower St. Ste. 2500 Los Angeles, Ca. 90071		10-28-82	\$200.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 200.00	
SUBTOTAL of Receipts This Page (optional)			\$8,300.00
TOTAL This Period (last page this line number only)			103,880.

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11/22/82

SCHEDULE A

ITEMIZED RECEIPTS

4 of 10 for
LINE NUMBER: 110
(Use separate schedule(s) for each category of the Donor's 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)
BROWN FOR U.S. SENATE

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
GTE GOOD GOV'T CLUB ONE STAMFORD FORUM STAMFORD, CONN. 06904	PAC # C00025163 C00025163	8/6/82	1,500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 1,500.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
GUARANTEE SAVINGS GOOD GOV'T COMM. 1177 FULTON MALL FRESNO, CALIF. 93721	PAC # C00065144 C00065144	8/24/82 9/29/82	1,200.00 1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 2,200.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
HUMAN RIGHTS CAMPAIGN FUND P.O. BOX 1396 WASHINGTON, D.C. 20013	PAC # C00130815 C00130815	7/22/82	400.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 400.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
I.B.E.W. - C.O.P.E. 1125 15th STREET N.W. WASHINGTON D.C. 20005	PAC #	7/26/82 8/30/82	1,000.00 1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 2,000.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
INTERNATIONAL LADIES GARMENT WORKERS UNION 1710 BROADWAY NEW YORK, N.Y. 10019	PAC # C00004861 C00004861	9/29/82	4,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 4,000.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
INTERNATIONAL LONGSHOREMEN'S & WAREHOUSEMAN'S UNION PAC 1188 FRANKLIN ST. SAN FRANCISCO, CA. 94109	PAC #	9/1/82	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 1,000.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
KIDS PAC 80 TROWBRIDGE STREET CAMBRIDGE, MASS. 01238	PAC # C00147975 C00147975	8/10/82	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$ 1,000.00	
SUBTOTAL of Receipts This Page (optional).....			12,100.-
TOTAL This Period (last page this line number only)			

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) **BROWN FOR U .S. SENATE**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
EMPLOYEES FOR GOOD GOVT. 420 MONTGOMERY ST. SAN FRANCISCO, CA		10/13	1,000.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 1,000.	
B. Full Name, Mailing Address and ZIP Code FRIENDS FO THE EARTH PAC 1045 SANSOME ST. SAN FRANCISCO, CA		10/13	180.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 180.	
C. Full Name, Mailing Address and ZIP Code HUMAN RIGHTS CAMPAIGN FUND PO BOX 1396 WASHINGTON D.C.		10/13	1500.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 180.	
D. Full Name, Mailing Address and ZIP Code IBEW 1125 15th ST. N.W. WASHINGTON, D.C.		10/8	2000.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
E. Full Name, Mailing Address and ZIP Code ILGWU 1710 BROADWAY NEW YORK, NY		10/8 10/8	1,000. 1,000.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$ 1,000	
F. Full Name, Mailing Address and ZIP Code JOSEPH SEAGRAMS AND SONS INC. 800 HTIRD AVE. NEW YOER, NY		10/12	1,000.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
G. Full Name, Mailing Address and ZIP Code LEAGUE OF CONSERVATION VOTERS 317 PENNSYLVANIA AVE S.E. WASHINGTON, D.C		10/11	1,000.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date-\$	
SUBTOTAL of Receipts This Page (optional)			8680
TOTAL This Period (last page this line number only)			

0376

Illegible handwritten notes

BROWN FOR U.S. SENATE
 1125 W. SIXTH ST. 212-977-1818
 LOS ANGELES, CA 90017

COMMERCIAL BANK
 200 SANTA MONICA BLVD. - LOS ANGELES, CA 90007

2026

60-330/1222

VOIDED

PAY

REGIS
 178423000 I000 0015 00 CTS

CHECK NO. DATE AMOUNT
 2026 July 13, 1984 \$1,000.00

TO THE ORDER OF

I.L.C.W.U.
 CAMPAIGN COMMITTEE
 1710 Broadway
 New York, N.Y. 10019

NOT NEGOTIABLE

⑆002026⑆ ⑆122239005⑆ 001 001248⑆

BROWN FOR U.S. SENATE

DELIVER FORM NWD-8 V-8

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
July 13, 1984	Refund of Contribution	1,000.00		

EMPLOYEE

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY
	HOURS	DATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHHOLDING U.S. INC. TAX	F. I. C. I.	STATE INCOME TAX		

mailed check

will appear on statement for this period 7/84

6604050376

1 5. My term as City Attorney ended on June 30, 1981.
2 After a month's vacation with my family, I began work with my
3 new law firm on August 1, 1981. On that date I also assumed the
4 treasurer position of the Brown campaign. I served as treasurer
5 until the end of that Senate campaign.

6 6. Throughout the period I was treasurer, I
7 endeavored to make sure that the Committee complied with federal
8 election laws. I know Governor Brown shared the same commit-
9 ment. (No doubt this is one of the reasons why he wanted me as
10 treasurer, given my law enforcement background.) I also believe
11 that Jodie Krajewski and her campaign staff felt the same way,
12 and that they took all reasonable measures to avoid election law
13 violations.

14 7. Shortly after becoming treasurer, I reviewed with
15 the staff the various procedural safeguards they had established
16 to assure compliance with the election laws and I made some
17 revisions of those procedures as needed.

18 8. As an additional safeguard, I endeavored to review
19 all campaign contributions received by the Committee -- subject
20 to the demand of my private law practice. I was able to review
21 almost all of the checks.

22 9. At my insistence, the Committee retained the
23 services of Jules Glazer, an outside accountant and expert on
24 campaign reporting laws. Among other things, Mr. Glazer's role
25 was to independently audit the campaign, review and install
26 internal bookkeeping procedures, and approve the campaign
27 reports before I signed them.

28

8504050371

8 6 0 4 0 5 6 4 7 7 6

REAVIS & McGRATH
SIXTH FLOOR · BROADWAY PLAZA
700 SOUTH FLOWER STREET
LOS ANGELES, CALIFORNIA 90017

TO:

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

dy

Attention: Gary Johansen

LOS ANGELES

archer
air courier
AIR PRIORITY
WORLDWIDE



Toll Free
800-223-5598

213-484-5100

FILED
- Occ # 3786

INTERNATIONAL LADIES' GARMENT WORKERS' UNION: 36

AFL-CIO

1710 BROADWAY • NEW YORK, N.Y. 10019

CABLE ADDRESS: ILGWU—NEW YORK • PHONE: 212-265-7000

LEGAL DEPARTMENT

MAX ZIMNY
General Counsel

JUN 23 11:00

June 22, 1984

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

Re: MUR 1716
Attention: Peter Knych

Dear Sir:

Enclosed is the response to the complaint in the captioned case filed on behalf of the ILGWU Campaign Committee and its Treasurers.

Also enclosed is a designation of the undersigned as counsel.

Sincerely yours,

Max Zimny
Max Zimny
General Counsel

MZ:cs
Enclosure
Certified Mail R.R.R.

40040363774

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1716

NAME OF COUNSEL: MAX ZIMNY

ADDRESS: 1710 Broadway

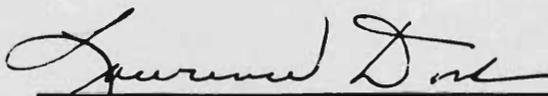
New York, N.Y. 10019

(212) 265-7000

TELEPHONE: _____

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.

June 22, 1984
Date



Signature
Acting Treasurer
ILGWU Campaign Committee

RESPONDENT'S NAME: ILGWU Campaign Committee and Lawrence Dock

ADDRESS: Acting Treasurer

1710 Broadway

New York, N.Y. 10019

HOME PHONE: (212) 225-7244

BUSINESS PHONE: (212) 265-7000

8604050375

4. In early April 1982, I instructed Ms. Friedman by phone from Washington to make a \$4,000 contribution from the ILGWU Campaign Committee to the Brown for U.S. Senate Committee for the primary election, and she did so on April 14, 1982. In August 1982, I instructed Ms. Friedman by phone from Washington to make two separate contributions from the Campaign Committee to the Brown for U.S. Senate Committee for the general election, and she did so on August 16, 1982 in the amount of \$1,000, and on August 7, 1982 in the amount of \$4,000.

5. As best I can recollect, in early October 1982, I was informed that the Brown Committee needed additional contributions to overcome a primary election deficiency, and I instructed Ms. Friedman by phone from Washington to make a \$1,000 contribution from the ILGWU Campaign Committee to the Brown for U.S. Senate Committee for the primary election. She sent this contribution on October 6, 1982, but, in error, noted it on her records as a contribution for the general election. Her error was carried in the report filed from New York with the Federal Election Commission for the month of October 1982.

6. My instructions to Ms. Friedman are reflected in the records of campaign contributions which I independently maintain in my Washington office. Attached hereto as Exhibit "A"

86040503777

is a copy of my record of campaign contributions to Brown in 1982. As can be seen, it indicates primary election contributions to Jerry Brown on April 14, 1982 of \$4,000 and on October 7, 1982, of \$1,000, and two general election contributions in August of \$1,000 and \$4,000, respectively. On June 12, 1984, the ILGWU Campaign Committee filed an amended report with the Federal Election Commission of campaign contributions for the month of October 1982 which corrected the aforesaid error.

7. I respectfully submit that the ILGWU Campaign Committee contributions to Brown in 1982 for the primary and general elctions did not exceed the separate \$5,000 limits provided by law.

Evelyn Dubrow
Evelyn Dubrow

Sworn to before me this
22nd day of June, 1984

Max Zimny
Notary Public

MAX ZIMNY
Notary Public, State of New York
No. 30-4392588
Qualified in Nassau County
Certificate filed in New York
Commission Expires March 31, 1985

PRIMARY, JUNE 8

CALIFORNIA

5/12/82
* denotes COPE endorsed

DEMOCRATS

*Jerry Brown
Paul-Carpenter
Tom Cardenas-
Arthur Shingleton
Gore Vidal
Dan Whitehurst-
William Wertz

REPUBLICANS & OTHERS

Theodore Bruinsma
Bob Dornan
Barry Goldwater, Jr.
Pete McCloskey
Maureen Reagan
Pete Wilson
William-Shockley

CONTRIBUTIONS

P \$4,000 4/14/82 straight
C 4,000 (2/82) - "
C 4,000 (3/27/82) "
P 1,000 (10/7/82) "

REMARKS

Incumbent S.I. HAYAKAWA not running again

HOUSE OF REPRESENTATIVES

DISTRICT

DEMOCRATS

1st ✓ *Douglas Bosco
Mike Koepf

REPUBLICANS & OTHERS

Don Clausen (Inc.)
David-Redlok (Lib.)

CONTRIBUTIONS

P \$500 (6/1/82) - straight
\$500 (2/13/82) - "
\$500 (10/6/82) "
\$500 10-22-82-82 "

REMARKS

2nd Jack Carrico
John Newmeyer

Eugene Chappie (Inc.)
Howard Fogarsky (Peace)

3rd * Robert Matsui (Inc.)

John-Reiger (Peace)
Bruce-Daniel (Lib.)

P \$350 8/26/81 (tkts.)
P \$200 (6/1/82) - straight
\$450 (8/82) - "

4th *Vic Fazio (Inc.)

Roger Canfield
Michael-Ciancy
Cy-Stevenson

P \$300 5/5/81 (tkts.)
P \$250 (6/1/82) - straight
\$450 (8/82) - "

5th *Phil Burton (Inc.)

Milton Marks
Tom Spineza
Justin-Tatmondo (LIB.)

P \$750 8/25/81 straight
P \$500 (6/1/82) - straight
\$750 (8/82) - "
\$1,000 (10/17/82) "
\$1,000 (10/24/82) "

RECEIVED
June 19, 1982
W. W. U.
LEGAL DEPT.

EXHIBIT "A"

6 7 7 8 9 5 0 7 0 9 8

8 6 0 4 0 5 6 3 7 8 0

From

MZ Legal



INTERNATIONAL LADIES' GARMENT WORKERS
UNION, 1710 BROADWAY, NEW YORK, N.Y. 10019

To

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

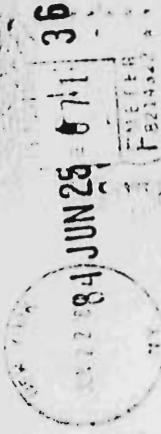
Attention: Peter Knych

426

CERTIFIED

No. 371075

MAIL



RECEIVED AT THE FEC

AMALGAMATED CLOTHING AND TEXTILE WORKERS UNION



MURRAY H. FINLEY
President

JACK SHEINKMAN
Secretary-Treasurer

SCOTT HOYMAN
Executive Vice President

84 JUL 10 P12:44
G 00#3998

AFL-CIO, CLC

July 9, 1984

15 UNION SQUARE • NEW YORK, N.Y. 10003
(212) 242-0700

EXPRESS MAIL: B38663352

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

JUL 10 P 1:28

Re: MUR 1716

Dear Mr. Steele,

This is in response to your letter dated June 6, 1984 notifying Respondents, Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC"), and George Solomons, Assistant Treasurer, that a complaint had been filed alleging that excessive campaign contributions had been made in violation of the Federal Election Campaign Act of 1971 (the "Act"). The apparent contribution in excess of the statutory limit was an inadvertent clerical error misidentifying a contribution to the general election as a contribution to the primary election. For reasons more fully stated below, Respondents respectfully request that no further action be taken on this matter.

The complaint alleges that ACTWU-PAC contributed \$6,000.00 to the 1982 Federal primary election for Edmund G. Brown, Brown for U.S. Senate in violation of the \$5,000.00 statutory limit provided in § 441(a)(2)(A) of the Act. The \$1,000.00 in alleged excessive contributions to the 1982 primary election represents a \$1,000.00 contribution made on or about October 20, 1982 for the general election, just prior to the general election in November 1982. The October 1982 contribution was improperly identified as a contribution to the primary election in ACTWU-PAC's report to the Federal Election Commission. This clerical error has been corrected in the Amended Report of Receipts and Disbursement for the Thirtieth Day following the General Election on November 2, 1982, attached hereto as Exhibit #1 (Schedule B, Page 1 of 3).

106040503731

VICE PRESIDENTS

JOHN ALLERUZO
SAMUEL J. AZZINARO
KILMER CABAN
LES CALDER
FRANK CALECA
CHARLES BUD CLARK

ED CLARK
JEAN-MARC COUTURE
OLGA DIAZ
JAMES DILLON
HENRY DROPKIN
BRUCE DUNTON
GARRY FERRARIS
JOHN FOX

SAM FOX
ANGELO G. GEORGIAN
HARRY GORDON
MARION E. GROCE
NICHOLAS GYORY
WILLIAM HALL
JOSEPH HUIGHE
JAMES JACKSON

JAMES A. JOHNSON
ARTHUR LOEVY
RICHARD MacFADYEN
JOYCE D. MILLER
VERA MILLER
MURRAY MORENO
FRANK NICHOLAS JR.
CARMEN PAPALE

BRUCE RAYNOR
CHARLES SALLEE
LEON SPITZER
PETER J. SWOBODA
CECIL TOPPIN
JIM WALRAVEN

Charles N. Steele
July 9, 1984
Page 2

The following review of relevant facts will demonstrate that the \$1,000.00 contribution was intended by all parties as a contribution to the general election, despite the clerical reporting error. On or about May 17, 1982, ACTWU-PAC contributed \$5,000.00 to the Brown for Senate Campaign for the California primary election in June 1982. This contribution was properly identified as a primary contribution in ACTWU-PAC's Report of Receipts and Disbursements for May 1982.^{1/} The \$5,000.00 contribution in May 1982 was the maximum allowable contribution for the primary election; 2 U.S.C. § 441. ACTWU-PAC made no additional contributions to the Brown for Senate Campaign in the primary of 1982.

36010503792
Shortly before the general election in November 1982, ACTWU-PAC contributed \$1,000.00 to the Brown for Senate Campaign in a check dated October 18, 1982. The covering letter accompanying the check is silent as to whether the check was intended for the primary or general election. (Copies of the covering letter dated October 20, 1982 and check dated October 18, 1982 are attached hereto as Exhibits #2A and #2B). The regulations of the Federal Election Commission provide that a contribution not designated in writing for a particular election will be deemed for a general election if made after the date of the primary election. 11 CFR § 110.1(2)(ii)(B). The \$1,000.00 contribution of October 1982 was not designated in writing for any particular election and was made several months after the primary election in June 1982. Accordingly, the \$1,000.00 contribution is properly considered a contribution to the general election.

The parties consistently treated the \$1,000.00 October contribution to Brown for Senate Campaign as a contribution to the general election, with the exception of ACTWU-PAC's clerical reporting error. ACTWU-PAC fully intended to and did comply with the statutory ceiling of \$5,000.00 for contributions to each federal election. The pattern of making contributions to the Brown for Senate Campaign shortly before each of the primary and general elections respectively, further demonstrates that the \$5,000.00 check dated May 17, 1982 was intended for the June

^{1/}A copy of ACTWU-PAC's Report of Receipts and Disbursements for May 1982 is on file with the Federal Election Commission.

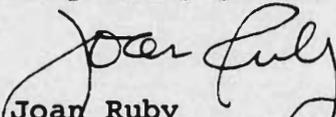
Charles N. Steele
July 9, 1984
Page 3

primary election and the \$1,000.00 check dated October 18, 1982 was intended for the November general election. Edmund G. Brown, Jr., Brown for U.S. Senate, accurately reported the \$1,000.00 contribution of October 1982 as a contribution for the general election.

As stated above, the identification of the October 18, 1982 contribution as a disbursement for the primary election was an inadvertent clerical error corrected in the amended report submitted with this letter as Exhibit #1. The clerical error misidentifying the \$1,000.00 as a contribution to the primary election should not be dispositive of the designation of the contribution, where the conduct of the parties and the application of Federal Election Commission regulations require that it be treated as a contribution to the general election. The accurate and most reasonable construction of the facts in this case is that ACTWU-PAC complied with that statutory limits in making contributions to the primary and general election for the Brown for Senate Campaign in 1982.

For the foregoing reasons, Respondents respectfully request that no further action be taken on this matter and that the complaint be dismissed.

Very truly yours,


Joan Ruby
Assistant General Counsel

JR/vk
Attachment

cc: Kenneth A. Gross, Associate General Counsel
Peter Kynch
George Solomons
Liz Smith
Arthur M. Goldberg
George A. Kirschenbaum

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

Name of Committee (in Full)

**Allegated Clothing and Textile Workers Union
Political Action Committee**

Report Covering the Period:

From: **10/14/82** to: **11/22/82**

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

24,459.35

120,648.10

(Memo Entry Unitemized \$ **24,439.35**)

(b) Political Party Committees

(c) Other Political Committees

24,459.35

120,648.10

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)

14,000.00

35,000.00

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

**16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES
AND OTHER POLITICAL COMMITTEES**

250.00

17. OTHER RECEIPTS (Dividends, Interest, etc.)

38,459.35

155,998.10

18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

11,100.00

167,071.47

**21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND
OTHER POLITICAL COMMITTEES**

22. INDEPENDENT EXPENDITURES (Use Schedule E)

**23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES
(2 U.S.C. §447a(d)) (Use Schedule F)**

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)

3,431.50

15,216.98

27. OTHER DISBURSEMENTS

14,531.50

192,288.45

28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d

30. TOTAL CONTRIBUTION REFUNDS from Line 26d

31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)

1040503783

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)

Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Scott Hoyman 81 E Newell Avenue Rutherford, N.J. 07070	Amalgamated Clothing and Textile Workers Union New York, New York	10-29-82	20.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice-President Aggregate Year-to-Date-\$ 240.00		
B. Full Name, Mailing Address and ZIP Code	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-\$		
C. Full Name, Mailing Address and ZIP Code	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-\$		
D. Full Name, Mailing Address and ZIP Code	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-\$		
E. Full Name, Mailing Address and ZIP Code	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	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-\$		
G. Full Name, Mailing Address and ZIP Code	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-\$		

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

20.00

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)
Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code Chicago and Central States Joint Board ACTMU Political Education Committee 333 So. Ashland Blvd. Chicago, Ill 60607	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period 10,000.00
	Occupation	10-21-82	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ 30,000.00		

B. Full Name, Mailing Address and ZIP Code Committee on Political Education, AFL_CIO 815 16th Street, N.W. Washington, D. C. 20006	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period 4,000.00
	Occupation	11-8-82	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		

C. Full Name, Mailing Address and ZIP Code	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—\$		

D. Full Name, Mailing Address and ZIP Code	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—\$		

E. Full Name, Mailing Address and ZIP Code	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	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—\$		

G. Full Name, Mailing Address and ZIP Code	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—\$		

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only) **14,000.00**

SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)			
Amalgamated Clothing and Textile Workers Union Political Action Committee			
A. Full Name, Mailing Address and ZIP Code Bob Shamansky for Congress Committee 101 No. High St. P.O. Box 15668 Columbus, Ohio 43215 OHIO	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	300.00
B. Full Name, Mailing Address and ZIP Code Paul Simon Congress Committee 231 West Maine, Apt. East Carbondale, Ill. 62901 ILL.	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	500.00
C. Full Name, Mailing Address and ZIP Code Aukerman for Congress Committee P.O. Box 172 Providence, R.I. 02901 R.I.	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	250.00
D. Full Name, Mailing Address and ZIP Code Brown for Senate Campaign 1125 West 6th St. Los Angeles, Calif. 90017 CALIF.	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	1000.00
E. Full Name, Mailing Address and ZIP Code James McClure Clarke for Congress P.O. Box 7434 Asheville, No. Car. 28817 NO. CAR.	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/18/82	300.00
F. Full Name, Mailing Address and ZIP Code Friends of Bob Carr 2110 East Michigan Lansing, Mich. 48912 MICH.	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/22/82	2000.00
G. Full Name, Mailing Address and ZIP Code Monsma for Congress 829 North Kentview, N.E. Grand Rapids, Mich. 49505 MICH.	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/22/82	2000.00
H. Full Name, Mailing Address and ZIP Code Committee to Re-elect Leo C Zefferetti C/O Joseph F. DeFina P.O. Box 221-Red Hook Station Brooklyn, N.Y. 11231 N.Y.	Purpose of Disbursement Tickets	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/22/82	100.00
I. Full Name, Mailing Address and ZIP Code Offner for Congress 1507 Losey Boulevard, South LaCrosse, Wisc. 54601 WISC.	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/82	50.00
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

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Name of Committee (in Full)
Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code Keep Kastenmeier in Congress P.O. Box 24236 Washington, D.C. 20024 WISC	Purpose of Disbursement Contribution	Date (month, day, year) 10/26/82	Amount of Each Disbursement This Period 200.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

B. Full Name, Mailing Address and ZIP Code Katie Hall for Congress 637 Broadway Gary, Ind. 46402 IND.	Purpose of Disbursement Contribution	Date (month, day, year) 10/26/82	Amount of Each Disbursement This Period 1000.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

C. Full Name, Mailing Address and ZIP Code Major Owens for Congress Committee 1125-29 Eastern Parkway Brooklyn, N.Y. 11213 NEW YORK	Purpose of Disbursement Contribution	Date (month, day, year) 10/26/82	Amount of Each Disbursement This Period 250.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

D. Full Name, Mailing Address and ZIP Code Sam Gejdenson for Congress P.O. Box 1982 Bozrah, Conn. 06334 CONN.	Purpose of Disbursement Contribution	Date (month, day, year) 10/26/82	Amount of Each Disbursement This Period 50.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

E. Full Name, Mailing Address and ZIP Code The Committee to Elect Ken Mosley P.O. Drawer 1569 Orangeburg, So. Car. 29115 SO. CAR.	Purpose of Disbursement Contribution	Date (month, day, year) 10/26/82	Amount of Each Disbursement This Period 250.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

F. Full Name, Mailing Address and ZIP Code Friends of Bob Carr 2110 East Michigan Lansing, Mich. 48912 MICH	Purpose of Disbursement Contribution	Date (month, day, year) 10/26/82	Amount of Each Disbursement This Period 500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

G. Full Name, Mailing Address and ZIP Code Robin Britt for Congress P.O. Box 222 122 East Market St. Greensboro, No. Car. 27402 NO. CAR.	Purpose of Disbursement Contribution	Date (month, day, year) 10/27/82	Amount of Each Disbursement This Period 300.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

H. Full Name, Mailing Address and ZIP Code Esiason Congressional Campaign Comm. P.O. Box 72 North Granville, N.Y. 12854 NEW YORK	Purpose of Disbursement Contribution	Date (month, day, year) 10/27/82	Amount of Each Disbursement This Period 250.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

I. Full Name, Mailing Address and ZIP Code Jim Guest for U.S. Senate P.O. Box 1438- 34 Main Street Montpelier, Vermont 05602 VERMONT	Purpose of Disbursement Contribution	Date (month, day, year) 10/27/82	Amount of Each Disbursement This Period 500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

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Name of Committee (in Full)

Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Frank Harrison for Congress Committee 15 South Franklin Street Wilkes Barre, Pa. 18711 PENNA	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	300.00
B. Full Name, Mailing Address and ZIP Code Terry Mann for Congress 731 Madison Avenue Covington, Kentucky 41011 KY.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	200.00
C. Full Name, Mailing Address and ZIP Code Don Mills for U.S. Congress Box 1124 Frankfort, Kentucky 40602 KY.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	250.00
D. Full Name, Mailing Address and ZIP Code Committee to Re-elect Wyche Fowler 207 C Street, S. E. Washington, D. C. 20003 GA.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/28/82	300.00
E. Full Name, Mailing Address and ZIP Code James J. Florio for Congress Committee P O Box 8028, Southwest Station Washington, D. C. 20024 N.J.	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/22/82	250.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			11,100.00

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Name of Committee (in Full)

Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Allen Ertel Democratic City Committee 1421 Walnut St. Philadelphia, Pa. 19102 For Gov. Pa.	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-14-82	1,000.00
B. Full Name, Mailing Address and ZIP Code Pottsville Republican 111 Mahantongo Street Pottsville, Pa. 17901	Newspaper Advertisement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-14-82	271.50
C. Full Name, Mailing Address and ZIP Code Rocks for Senate Committee 7707 Ridge Avenue Philadelphia, Pa. 19128 State Senate - Pa	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-18-82	500.00
D. Full Name, Mailing Address and ZIP Code 1st Legislative District Organiza- tion 125 E. Broad Street Hazelton, Pa. 18201	Tickets Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-22-82	100.00
E. Full Name, Mailing Address and ZIP Code John F. Kennedy-David L. Lawrence Annual Dinner - Suite 1100 Manor Bldg. 564 Forbes Avenue Pittsburgh, Pa. 15219	Tickets Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-22-82	100.00
F. Full Name, Mailing Address and ZIP Code Allen Ertel Committee 14 Wood Street 1203 West Penn Bldg. Pittsburgh, Pa. 15222 For Gov. Pa	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-26-82	500.00
G. Full Name, Mailing Address and ZIP Code As per listing attached	Polling Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/28,29	950.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			3,531.50

Amalgamated Clothing and Textile Workers Union Political Action Committee

Francis Gardner	Pottsville, Pa. 17901	\$25.00	
Frances Ludwig	Pottsville, Pa. 17901	\$25.00	
Joan Botto	Pottsville, Pa. 17901	25.00	
Michael Sninsky	Port Carbon, Pa. 17965	25.00	
Helen Weiss	Pottsville, Pa. 17901	25.00	
Agnes Herst	Pottsville, Pa. 17901	25.00	
Charles Dreis	Pottsville, Pa. 17901	25.00	
Sarbra Weiss	Pottsville, Pa. 17901	25.00	
Setty Hellman	Minersville, Pa. 17954	25.00	
Stella Ryder	Frackville, Pa. 17931	25.00	
Margaret Kuchta	Frackville, Pa. 17931	25.00	
Joseph Martin	Frackville, Pa. 17931	25.00	
Helen Dower	Frackville, Pa. 17931	25.00	
Frank Brown	Pine Grove, Pa. 17963	25.00	
Bill Alonge	Brockton, Pa. 17925	25.00	
Al Pilo	Brockton, Pa. 17925	25.00	
Maryann Hiskie	New Philadelphia, Pa. 17959	25.00	
Harry Mahn	Maryd, Pa. 17952	25.00	
Frances Guzik	Shamokin, Pa. 17872	25.00	
Genevieve Daniels	Shamokin, Pa. 17872	25.00	
Yvonne Loeper	Shamokin, Pa. 17872	25.00	
Rosemary Keegan	Shamokin, Pa. 17872	25.00	
Frances Yoblonski	Shamokin, Pa. 17872	25.00	
Joseph Fritz	McAdoo, Pa. 18237	25.00	
Joseph Billett	McAdoo, Pa. 18237	25.00	
Patricia Salata	McAdoo, Pa. 18237	25.00	
Daniel Friendly	McAdoo, Pa. 18237	25.00	
Catherine Barkanik	Freeland, Pa. 18224	25.00	
Ann Marie Kopczynski	Freeland, Pa. 18224	25.00	
Almina Di Fio	Freeland, Pa. 18224	25.00	
Rosemary Buchman	Freeland, Pa. 18224	25.00	
Irene Chernetsky	Hazleton, Pa. 18201	25.00	
Ann Tucci	Hazleton, Pa. 18201	25.00	
Rose Kern	Mahanoy City, Pa. 17948	25.00	
Gary Mysliewicz	Mahanoy City, Pa. 17948	25.00	
Margaret Igo	Mahanoy City, Pa. 17948	25.00	
Grace Sabol	Mahanoy City, Pa. 17948	25.00	
Mary Davendish	Mahanoy City, Pa. 17948	25.00	
Patricia Kurdinsky	Mahanoy City, Pa. 17948	25.00	
Joe Echo	Mahanoy City, Pa. 17948	25.00	
Ethel Joyce	Pottsville, Pa. 17901	(20.00)	1981 ck voided
Joan Botto	Pottsville, Pa. 17901	(20.00)	1981 ck voided

960.00



POLITICAL ACTION COMMITTEE

15 Union Square, New York, N.Y. 10003 (212) 255-7800

Murray H. Finley
Chairman

Jacob Sheinkman
Treasurer

Sol Stetin
Senior Vice Chairman

WASHINGTON OFFICE

Elizabeth M. Smith
Director, Legislative
and Political Education

Room 310
815 16th Street, N.W.
Washington, D.C. 20006
(202) 628-0214

October 20, 1982

Honorable Jerry Brown
1125 West 6th Street
Los Angeles, California 90017

Dear Gov. Brown:

We are pleased to enclose our check in the amount of \$1,000.00 as a contribution to your campaign for the U.S. Senate.

May we take this opportunity to convey our hope that we may have your support in connection with issues which affect the members of the Amalgamated Clothing and Textile Workers Union, whose voluntary donations have made this contribution possible.

Our best wishes to you for a very successful campaign.

Very truly yours,

Murray H. Finley
Chairman

Jacob Sheinkman
Treasurer

mhf/js
rs
enc.

Exhibit #2A

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

DATE	AMOUNT
Contribution	
TOTAL OF INVOICES	
LESS % DISCOUNT	
LESS	
TOTAL DEDUCTIONS	
AMOUNT OF CHECK	

ACTWU POLITICAL ACTION COMMITTEE #6
 15 UNION SQUARE
 NEW YORK, N.Y. 10003

953

1-337/240

October 18 1982

PAY TO THE ORDER OF Brown for Senate Campaign \$1,000.00

One thousand and 00/100 DOLLARS

The Amalgamated Bank of New York
 5152 11-15 UNION SQUARE NEW YORK, NEW YORK 10003

Alvarez, H. F.
J. Solomons

⑆026003379⑆ 01077276⑆ ⑆0000100000⑆

Exhibit #2B

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

Name of Committee (in Full)
**Amalgamated Clothing and Textile Workers Union
Political Action Committee**

Report Covering the Period:
From: **10/14/82** to: **11/22/82**

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unitemized \$ 24,439.35)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES
AND OTHER POLITICAL COMMITTEES

17. OTHER RECEIPTS (Dividends, Interest, etc.)

18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND
OTHER POLITICAL COMMITTEES

22. INDEPENDENT EXPENDITURES (Use Schedule E)

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES
(2 U.S.C. §441(d)) (Use Schedule F)

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)

27. OTHER DISBURSEMENTS

28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d

30. TOTAL CONTRIBUTION REFUNDS from Line 26d

31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)

**COLUMN A
Total This Period**

**COLUMN B
Calendar Year-to-Date**

24,459.35

120,548.10

24,459.35

120,648.10

14,000.00

35,000.00

250.00

38,459.35

155,998.10

11,100.00

167,071.47

3,431.50

15,216.98

14,531.50

182,288.45

0040703790

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Name of Committee (in Full)
Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Scott Hoyman 81 E Newell Avenue Rutherford, N.J. 07070	Amalgamated Clothing and Textile Workers Union New York, New York	10-29-82	20.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Vice-President Aggregate Year-to-Date—\$ 240.00		
B. 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—\$		
C. 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—\$		
D. 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—\$		
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
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date—\$		
G. 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—\$		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (next page this line number only)			20.00

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Name of Committee (in Full)			
Amalgamated Clothing and Textile Workers Union Political Action Committee			
A. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Chicago and Central States Joint Board ACTWU Political Education Committee 333 So. Ashland Blvd. Chicago, Ill 60607			10-21-82
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
			10,000.00
		Aggregate Year-to-Date-\$ 30,000.00	
B. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Committee on Political Education, AFL-CIO 815 16th Street, N.W. Washington, D. C. 20006			11-8-82
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
			4,000.00
		Aggregate Year-to-Date-\$	
C. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
		Aggregate Year-to-Date-\$	
D. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
		Aggregate Year-to-Date-\$	
E. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
		Aggregate Year-to-Date-\$	
F. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
		Aggregate Year-to-Date-\$	
G. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
		Aggregate Year-to-Date-\$	
SUBTOTAL of Receipts (This Page optional)			
TOTAL This Period (last page this line number only)			14,000.00

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Name of Committee (in Full)			
Amalgamated Clothing and Textile Workers Union Political Action Committee			
A. Full Name, Mailing Address and ZIP Code Keep Kastenmeier in Congress P.O. Box 24236 Washington, D.C. 20024 WISC	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/26/82	Amount of Each Disbursement This Period 200.00
B. Full Name, Mailing Address and ZIP Code Katie Hall for Congress 637 Broadway Gary, Ind. 46402 IND.	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/26/82	Amount of Each Disbursement This Period 1000.00
C. Full Name, Mailing Address and ZIP Code Major Owens for Congress Committee 1125-29 Eastern Parkway Brooklyn, N.Y. 11213 NEW YORK	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/26/82	Amount of Each Disbursement This Period 250.00
D. Full Name, Mailing Address and ZIP Code San Cejerson for Congress P.O. Box 1982 Bozrah, Conn. 06334 CONN	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/26/82	Amount of Each Disbursement This Period 50.00
E. Full Name, Mailing Address and ZIP Code The Committee to Elect Ken Mosley P.O. Drawer 1569 Orangeburg, So. Car. 29115 SO. CAR.	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/26/82	Amount of Each Disbursement This Period 250.00
F. Full Name, Mailing Address and ZIP Code Friends of Bob Carr 2110 East Michigan Lansing, Mich. 48912 MICH	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/26/82	Amount of Each Disbursement This Period 500.00
G. Full Name, Mailing Address and ZIP Code Robin Britt for Congress P.O. Box 222 122 East Market St. Greensboro, No. Car. 27402 NO. CAR.	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/27/82	Amount of Each Disbursement This Period 300.00
H. Full Name, Mailing Address and ZIP Code Esiason Congressional Campaign Comm. P.O. Box 72 North Granville, N.Y. 12854 NEW YORK	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/27/82	Amount of Each Disbursement This Period 250.00
I. Full Name, Mailing Address and ZIP Code Jim Guest for U.S. Senate P.O. Box 1438- 34 Main Street Montpelier, Vermont 05602 VERMONT	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/27/82	Amount of Each Disbursement This Period 500.00
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

Name of Committee (in Full)			
Amalgamated Clothing and Textile Workers Union Political Action Committee			
A. Full Name, Mailing Address and ZIP Code Bob Shamansky for Congress Committee 101 No. High St. P.O. Box 15668 Columbus, Ohio 43215 OHIO	Purpose of Disbursement Contribution	Date (month, day, year) 10/18/82	Amount of Each Disbursement This Period 300.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
B. Full Name, Mailing Address and ZIP Code Paul Simon Congress Committee 231 West Maine, Apt. East Carbondale, Ill. 62901 ILL.	Purpose of Disbursement Contribution	Date (month, day, year) 10/18/82	Amount of Each Disbursement This Period 500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code Aukerman for Congress Committee P.O. Box 172 Providence, R.I. 02901 R.I.	Purpose of Disbursement Contribution	Date (month, day, year) 10/18/82	Amount of Each Disbursement This Period 250.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code Brown for Senate Campaign 1125 West 6th St. Los Angeles, Calif. 90017 CALIF.	Purpose of Disbursement Contribution	Date (month, day, year) 10/18/82	Amount of Each Disbursement This Period 1000.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code James McClure Clarke for Congress P.O. Box 7434 Asheville, No. Car. 28817 NO. CAR.	Purpose of Disbursement Contribution	Date (month, day, year) 10/18/82	Amount of Each Disbursement This Period 300.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code Friends of Bob Carr 2110 East Michigan Lansing, Mich. 48912 MICH.	Purpose of Disbursement Contribution	Date (month, day, year) 10/22/82	Amount of Each Disbursement This Period 2000.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code Monsma for Congress 829 North Kentview, N.E. Grand Rapids, Mich. 49505 MICH.	Purpose of Disbursement Contribution	Date (month, day, year) 10/22/82	Amount of Each Disbursement This Period 2000.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code Committee to Re-elect Leo C Zeffereetti C/O Joseph F. DeFina P.O. Box 221-Red Hook Station Brooklyn, N.Y. 11231 N.Y.	Purpose of Disbursement Tickets	Date (month, day, year) 10/22/82	Amount of Each Disbursement This Period 100.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code Offner for Congress 1507 Losey Boulevard, South LaCrosse, Wisc. 54601 WISC.	Purpose of Disbursement Contribution	Date (month, day, year) 10/26/82	Amount of Each Disbursement This Period 50.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

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)

Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Frank Harrison for Congress Committee 15 South Franklin Street Wilkes Barre, Pa. 18711 PENNA	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	300.00
Terry Mann for Congress 731 Madison Avenue Covington, Kentucky 41011 KY.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	200.00
Don Mills for U.S. Congress Box 1124 Frankfort, Kentucky 40602 KY.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/82	250.00
Committee to Re-elect Wyche Fowler 207 C Street, S. E. Washington, D. C. 20003 GA.	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/28/82	300.00
James J. Florio for Congress Committee P O Box 8028, Southwest Station Washington, D. C. 20024 N.J.	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/22/82	250.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			11,100.00

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)

Amalgamated Clothing and Textile Workers Union Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Allen Ertel Democratic City Committee 1421 Walnut St. Philadelphia, Pa. 19102 For Gov. Pa.	Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-14-82	1,000.00
B. Full Name, Mailing Address and ZIP Code Pottsville Republican 111 Mahantongo Street Pottsville, Pa. 17901	Purpose of Disbursement Newspaper Advertisement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-14-82	271.50
C. Full Name, Mailing Address and ZIP Code Rocks for Senate Committee 7707 Ridge Avenue Philadelphia, Pa. 19128 State Senate - Pa	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-13-82	500.00
D. Full Name, Mailing Address and ZIP Code 1st Legislative District Organiza- tion 125 E. Broad Street Hazelton, Pa. 18201	Purpose of Disbursement Tickets Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-22-82	100.00
E. Full Name, Mailing Address and ZIP Code John F. Kennedy-David L. Lawrence Annual Dinner - Suite 1100 Manor Bldg. 564 Forbes Avenue Pittsburgh, Pa. 15219	Purpose of Disbursement Tickets Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-22-82	100.00
F. Full Name, Mailing Address and ZIP Code Allen Ertel Committee 14 Wood Street 1203 West Penn Bldg. Pittsburgh, Pa. 15222 For Gov. Pa	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-26-82	500.00
G. Full Name, Mailing Address and ZIP Code As per listing attached	Purpose of Disbursement Polling Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/28,29	960.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			3,431.50

Analgamated Clothing and Textile Workers Union Political Action Committee

Francis Gardner	Pottsville, Pa. 17901	\$25.00	
Frances Ludwig	Pottsville, Pa. 17901	\$25.00	
Joan Botto	Pottsville, Pa. 17901	25.00	
Michael Sninsky	Port Carbon, Pa. 17965	25.00	
Helen Weiss	Pottsville, Pa. 17901	25.00	
Agnes Herst	Pottsville, Pa. 17901	25.00	
Charles Dreis	Pottsville, Pa. 17901	25.00	
- Sarbra Weiss	Pottsville, Pa. 17901	25.00	
Setty Hellman	Minersville, Pa. 17954	25.00	
Stella Ryder	Frackville, Pa. 17931	25.00	
Margaret Kuchta	Frackville, Pa. 17931	25.00	
Joseph Martin	Frackville, Pa. 17931	25.00	
Helen Dower	Frackville, Pa. 17931	25.00	
Frank Brown	Pine Grove, Pa. 17963	25.00	
Bill Alonge	Brockton, Pa. 17925	25.00	
Al Pilo	Brockton, Pa. 17925	25.00	
Maryann Hiskie	New Philadelphia, Pa. 17959	25.00	
Harry Hahn	Maryd, Pa. 17952	25.00	
Frances Guzik	Shamokin, Pa. 17872	25.00	
Genevieve Daniels	Shamokin, Pa. 17872	25.00	
Yvonne Loeper	Shamokin, Pa. 17872	25.00	
Rosemary Keegan	Shamokin, Pa. 17872	25.00	
Frances Yoblonski	Shamokin, Pa. 17872	25.00	
Joseph Fritz	McAdoo, Pa. 18237	25.00	
Joseph Billett	McAdoo, Pa. 18237	25.00	
Patricia Salata	McAdoo, Pa. 18237	25.00	
Daniel Friendly	McAdoo, Pa. 18237	25.00	
Catherine Barkanik	Freeland, Pa. 18224	25.00	
Ann Marie Kopczinski	Freeland, Pa. 18224	25.00	
Almina Di Fio	Freeland, Pa. 18224	25.00	
Rosemary Buchman	Freeland, Pa. 18224	25.00	
Irene Chernetsky	Hazleton, Pa. 18201	25.00	
Ann Tucci	Hazleton, Pa. 18201	25.00	
Rose Kern	Mahanoy City, Pa. 17948	25.00	
Gary Mysliewicz	Mahanoy City, Pa. 17948	25.00	
Margaret Igo	Mahanoy City, Pa. 17948	25.00	
Grace Sabol	Mahanoy City, Pa. 17948	25.00	
Mary Davendish	Mahanoy City, Pa. 17948	25.00	
Patricia Kurdinsky	Mahanoy City, Pa. 17948	25.00	
Joe Echo	Mahanoy City, Pa. 17948	25.00	
Ethel Joyce	Pottsville, Pa. 17901	(20.00)	1981 ck voided
Joan Botto	Pottsville, Pa. 17901	(20.00)	1981 ck voided

960.00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/SUSAN M. TEIR

DATE: JULY 6, 1984

SUBJECT: MUR 1716 - FIRST GENERAL COUNSEL'S
REPORT signed July 3, 1984

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 11:00 on July 5, 1984.

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

86040103305



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *W*
DATE: July 3, 1984
SUBJECT: MUR 1716 - 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	[]	Compliance	[X]
Sensitive	[]	Audit Matters	[]
Non-Sensitive	[]	Litigation	[]
24 Hour No Objection	[X]	Closed MUR Letters	[]
Sensitive	[X]	Status Sheets	[]
Non-Sensitive	[]	Advisory Opinions	[]
Information	[]	Other (see distribution below)	[]
Sensitive	[]		
Non-Sensitive	[]		
Other	[]		

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

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

FIRST GENERAL COUNSEL REPORT P 3 : 43

SENSITIVE

DATE AND TIME OF TRANSMITTAL BY OGC TO THE COMMISSION 7/3/84 - 3:45 MUR 1716
DATE COMPLAINT RECEIVED BY OGC June 1, 1984
DATE OF NOTIFICATION TO RESPONDENTS June 6, 1984
STAFF MEMBER: Peter Knych

COMPLAINANT'S NAME: James Edward Antosh

RESPONDENTS' NAME: Edmund G. Brown, Jr.
Brown for United States Senate Committee and its treasurer, Burt Pines
American Federation of Teachers Committee on Political Education and its treasurer, Robert G. Porter
Political Action Council of Educators and its treasurer, William Zimmerman
Amalgamated Clothing and Textile Workers Union PAC and its treasurer, George Solomons
International Ladies Garment Workers Union Campaign Committee and its treasurer, Lawrence Dock

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

SUMMARY OF ALLEGATIONS

On June 1, 1984, James Edward Antosh (the "Complainant") filed a complaint with the Federal Election Commission alleging that the Brown for U.S. Senate Committee (the "Brown Committee") accepted excessive contributions from a number of union political action committees. A summary of the complainants allegations are as follows:

1. Complainant alleges that the following political action committees and their treasurers violated 2 U.S.C. § 441a(a)(2)(A) by making excessive contributions to the Brown Committee during the 1982 California primary and general elections:

20800307007

- a) American Federation of Teachers Committee on Political Education ("AFT-COPE"), treasurer Robert G. Porter and its alleged affiliate, Political Action Council of Educators ("PACE"), treasurer William Zimmerman.
- b) Amalgamated Clothing and Textile Workers Union PAC ("ACTWU-PAC"), treasurer George Solomons.
- c) International Ladies Garment Workers Union Campaign Committee ("ILGWUCC"), treasurer Lawrence Dock.

2. Complainant alleges that Edmund G. Brown, Jr., the Brown for United States Senate Committee, and its treasurer violated 2 U.S.C. § 441a(f) for receipt of contributions in excess of limitations at 2 U.S.C. § 441a(a)(2)(A) from the above-named committees.

3. Complainant alleges the Brown Committee and PACE failed to designate on their reports whether the April 5, 1982, contribution was intended for the primary election or general election in violation of 11 C.F.R. § 104.14(d) and that the Brown Committee failed to accurately report the proper election designation for a number of contributions in violation of 11 C.F.R. § 104.14(d).

FACTUAL AND LEGAL ANALYSIS

A review of the reports filed with the Federal Election Commission reveals that the following contributions were made to the Brown Committee:

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	<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>
a.	PACE	\$1,000	7/2/81	none	7/14/81	primary
	PACE	\$1,000	4/5/82	none (dinner)	4/15/82	none
	AFT-COPE	\$5,000	5/26/82	primary	6/5/82	primary
	AFT-COPE	\$4,425	5/26/82	primary	8/18/82	general
	AFT-COPE	<u>\$ 575</u>	5/26/82	general	8/18/82	general
	Total	\$12,000 - claimed excess \$6,425				
b.	ACTWU-PAC	\$ 5,000	5/17/82	primary	5/27/82	primary
	ACTWU-PAC	<u>\$ 1,000</u>	10/18/82	primary	11/4/82	general
	Total	\$ 6,000 - claimed excess \$1,000				
c.	ILGWUCC	\$ 1,000	8/16/82	general	10/8/82	general
	ILGWUCC	\$ 4,000	8/27/82	general	9/29/82	general
	ILGWUCC	<u>\$ 1,000</u>	10/6/82	general	10/8/82	general
	Total	\$ 6,000 - claimed excess \$1,000				

The California primary election was held on June 8, 1982.

The Office of General Counsel notified the respondents of the complaint on June 6, 1984. Following receipt of the complaint the Brown Committee requested a thirty-day extension in which to respond. The Brown Committee requested the extension because of the complexities of the complaint and the fact that the Brown Committee's reduced staff would have difficulty locating the appropriate sealed records. The extension was granted. The Brown Committee's reponse is due July 24, 1984.

Also, AFT-COPE requested a fifteen-day extension in which to respond to the complaint. AFT-COPE requested the extension because of previous commitments of its counsel. The extension was granted. AFT-COPE's response is due July 12, 1984.

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Finally, ACTWU-PAC requested a 14 day extension in which to respond to the complaint. The extension was requested due to ACTWU's triennial convention in Florida the week of June 11 and because of the unavailability of its counsel the following week. The extension was granted. ACTWU's response is due July 11, 1984.

A General Counsel's report will be submitted to the Commission after receipt of the responses.

Charles N. Steele
General Counsel

July 3, 1984
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1984

Leo Geffner
Geffner & Satzman
3055 Wilshire Boulevard, Suite 900
Los Angeles, California 90010

Re: MUR 1716

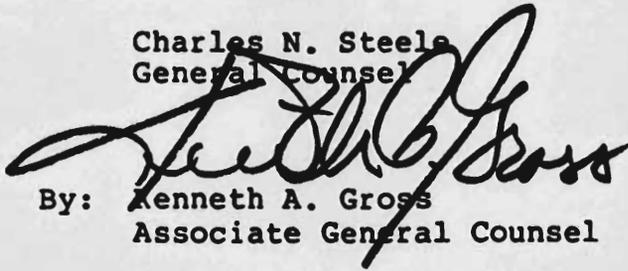
Dear Mr. Geffner:

This is in reference to your letter dated July 6, 1984, requesting an extension of time to respond to the complaint filed in the above noted matter. In your letter you indicated that your client's response was being coordinated with the American Federation of Teachers' response. For that reason, the Commission has determined to grant you an extension of time commensurate with the time extension granted to AFT. Accordingly, your response is due on July 21, 1984.

If you have any questions, please contact Gary Johansen, Assistant General Counsel assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

8 0 0 4 0 5 0 3 8 1 1

Case # 3977

Geffner & Satzman

A Professional Corporation

3055 Wilshire Boulevard, Suite 900
Los Angeles, California 90010
(213) 487-1520 • (213) 531-9724

OF COUNSEL
Michael Smolen
Leslie J. Garber
Joseph Posner
Martin S. Baker
Bruce B. Johnson

04 JUL 18

Attorneys at Law

Leo Geffner
Barry Satzman
Irwin L. Goldstein
Michael Posner
Howard Z. Rosen
Jeffrey Paule

Helena Sunny Wise

Ruben Scott
E. Alain Levi
Philip H. Smith
Leland Rosner

Judge (Ret.) William S. Hassen
Louis Rimbach
Diana Denton

July 6, 1984

Mr. Kenneth A. Gross
Associated General Counsel
Federal Election Commission
1325 K Street, N.W., 7th Floor
Washington D.C. 20463

RE: Political Action Council of Educators
and William Zimmerman - United Teachers Los Angeles -
MUR 1716

Dear Mr. Gross:

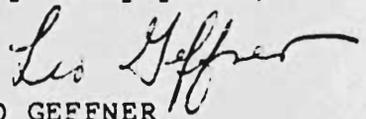
I recently filed a statement of designation of counsel that this office will represent the Political Action Council of Educators of the United Teachers Los Angeles and William Zimmerman concerning the above Complaint.

I am requesting an extension of time in which to file a response to the Complaint. At this time, I am attempting to obtain all the necessary information regarding the allegations in the Complaint. I am coordinating our response with the American Federation of Teachers. I have been in consultation with Bill Oldaker, who represents the AFT and also requested an extension of time to file a response.

I would appreciate a thirty day extension to file a response.

Thank you for your cooperation.

Very truly yours,



LEO GEFNER
LG:lam/70A20

cc: Judy Solkovitz, President
United Teachers Los Angeles

William Zimmerman
United Teachers Los Angeles

William Oldaker, Atty

85040563812

JUL 11 1984



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 26, 1984

Mr. Burt Pines, Esquire
Alschuler, Grossman & Pines
12th Floor, 18 Century Park East
Los Angeles, California 90067-1694

Re: MUR 1716

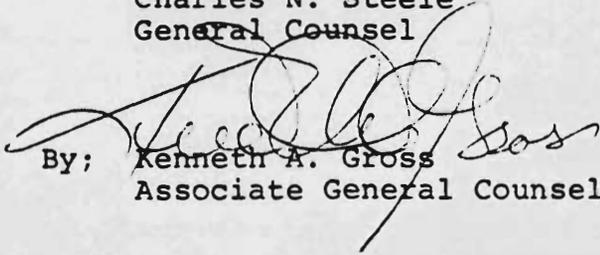
Dear Mr. Pines:

This is in reference to your letter dated June 15, 1984, requesting an extension of 30 days to respond to the complaint filed in the above noted matter. After considering the circumstances presented in your letter, the Commission has determined to grant you your requested extension. Accordingly, your response will be due on July 20, 1984.

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

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

86040583813

LAW OFFICES OF
ALSCHULER, GROSSMAN & PINES

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

TWELFTH FLOOR, 1880 CENTURY PARK EAST

LOS ANGELES, CALIFORNIA 90067-1094

TELEPHONE (213) 277-1226

21 JUN 20 1984 8:39

OF COUNSEL
BENJAMIN F. SCHWARTZ
RICHARD H. MILLEN
MAURICE MAC GOODSTEIN
IRVING KELLOGG

CABLE: SAGELAW
TELEX: 910-490-2114
TELECOPIER:
(213) 582-6077

June 15, 1984

GCC #3690

OUR FILE NO.

JUN 20 1984 9:21

- LEON S. ALSCHULER*
- MARSHALL S. GROSSMAN*
- BURT PINES*
- MELVYN B. FLIEGEL*
- BRUCE WARNER*
- MARCO F. WEISS*
- HENRY S. ZANGWILL*
- FRANK KAPLAN*
- BRUCE S. ROSS*
- HOWARD WOLLITZ*
- MICHAEL J. BRILL*
- KAREN KAPLOWITZ*
- ROBERT A. SHLACHTER*
- ROBERT S. OWENS
- WILLIAM S. SMALL
- MORTON R. FIELD
- DENNIS A. KAHAN
- PAUL H. ROCHMES
- LINDA S. GACH
- SANDRA J. CHAN
- LINDA SUTTON
- JEFFREY Q. KICHAVEN
- MICHAEL A. SHERMAN
- CHERYL B. FEIGENSON
- MICHAEL L. CYPERS
- PETER J. COHEN
- KIM ROBERT MAEROWITZ
- JOHN A. SCHWIMMER
- *A PROFESSIONAL CORPORATION

Mr. Peter Knych
Federal Election Commission
Washington, D.C. 20463

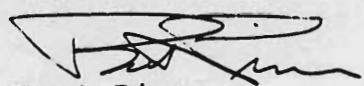
Re: Antosh v. Edmund G. Brown, Jr., et al.
Complaint No. MUR 1716

Dear Mr. Knych:

This confirms our telephone conversation yesterday wherein you granted me a thirty-day extension to and including July 30, 1984 to respond to the above-referenced complaint.

Thank you for your courtesy in this matter.

Very truly yours,



Burt Pines

BP:dw

86040363814

RECEIVED AT THE FEC
Call 3813

84 JUN 26 8:51

REAVIS & McGRATH

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SIXTH FLOOR · BROADWAY PLAZA

700 SOUTH FLOWER STREET

LOS ANGELES, CALIFORNIA 90017

345 PARK AVENUE
NEW YORK, N. Y. 10154

1776 F STREET, N. W.
WASHINGTON, D. C. 20008

TELEPHONE 213 626-6241
TELECOPIER 213 489-1883
CABLE ADDRESS KEARN
TELEX: 69-1208

June 22, 1984

JUN 26 1984 8:51

Peter Knych
Federal Election Commission
Washington, D.C. 20463

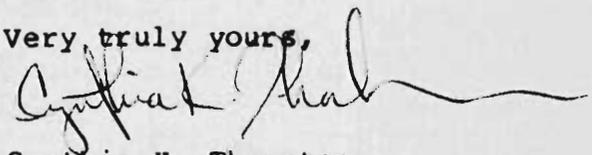
Re: MUR 1716

Dear Peter:

This is to confirm our telephone conversation of Monday, June 18, 1984, wherein we agreed to a 30 day extension of time to respond to MUR 1716. Mr. Burt Pines arranged individually for his extension, but we are also requesting this extension for our other clients, Jerry Brown, Jules Glazer and the Brown for U.S. Senate Committee, so that we may develop a complete and consistent response for each of them. We also agreed that every attempt would be made to get a reply on file before July and prior to the expiration of the 30 day extension on July 30, 1984. If this does not comport with your understanding of our conversation, please contact me immediately.

I enjoyed talking with you. Thank you for your cooperation in this matter.

Very truly yours,

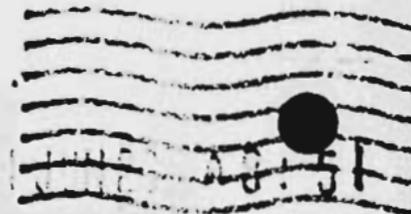


Cynthia K. Thornton

CKT/vc

36040703915

REAVIS & McGRATH
SIXTH FLOOR BROADWAY PLAZA
700 SOUTH FLOWER STREET
LOS ANGELES, CALIFORNIA 90017



Peter Knych
Federal Election Commission
Washington, D.C. 20463





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463.

June 21, 1984

William C. Oldaker, Esquire
Epstein Becker Borsody & Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 20036

Re: MUR 1716
AFT COPE

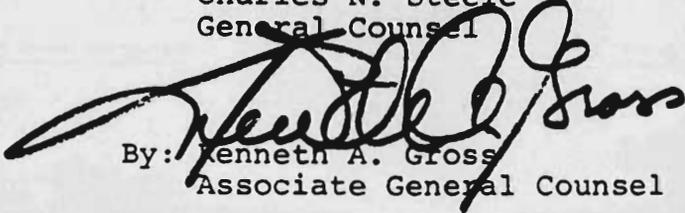
Dear Mr. Oldaker:

This is in reference to your letter dated June 15, 1984, requesting an extension of 15 days to respond to the complaint filed in the above-noted matter. After considering the circumstances presented in your letter, the Commission has determined to grant you your requested extension. Accordingly, your response will be due on July 21, 1984.

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

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

8604033917

EPSTEIN BECKER BORSODY & GREEN, P.C.

ATTORNEYS AT LAW

1140 19TH STREET, N.W.
WASHINGTON, D. C. 20036

(202) 861-0900
JUN 18 AM 10:07

Kynch

250 PARK AVENUE
NEW YORK, NEW YORK 10177
(212) 370-9800

MALICK TOWER
ONE SUMMIT AVENUE
FORT WORTH, TEXAS 76102¹
(817) 334-0701

235 MONTGOMERY STREET
SAN FRANCISCO, CALIFORNIA 94104¹
(415) 398-5565

1875 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067
(213) 556-8861

STEVEN M. CARSEY**
EDWIN N. EPSTEIN
ARNOLD R. LEVY*
JAMES P. MULKEEN
WILLIAM C. OLDAKER
DONALD PARTLAND*
FREDERICK E. SMITHLINE*
SIDNEY TODRES*
OF COUNSEL

¹P.C. NEW YORK AND
WASHINGTON, D.C. ONLY

JEFFREY H. BECKER
ROBERT P. BORSODY
LAURENCE K. BROWN*
WILLIAM A. CARNELL*
STEVEN S. EPSTEIN
STUART M. GERSON
GILBERT J. GINSBURG
RONALD M. GREEN
KENNETH HARFENIST*
WILLIAM A. HELVESTINE*
GREGORY K. HIESTAND*
ROBERT L. JAUVTIS*
WILLIAM G. KOPIT
FRANK C. MORRIS, JR.
JOSEPH P. PARKER**
SUSAN SCHENKEL-SAVITT*
FRANKLIN R. SEARS**
RICHARD G. VERNON

JEAN M. GALLOWAY
PHILIP M. GASSER*
PETER S. GRAY
DOUGLAS A. HASTINGS
LISA S. HOROWITZ
WAYNE A. KEUP*
LISL E. KING
SANDRA R. KING
DENNIS A. LALLI*
DAVID H. LARRY
JUDAH LIPSCHITZ
DAVID C. MAIN, JR.
STEPHEN R. MILLS*
ROBERT J. MOSES
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DONALD S. PICARD
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KATHERINE McBROOM-REDWINE
RICHARD J. REIBSTEIN*
ROBERT D. REIF
DONALD G. SHALHOUB
LYNN E. SHAPIRO
RICHARD L. STEER*
LINDA V. TIANO*
KENNETH B. WECKSTEIN
RANDALL G. WELLS*
TERESA M. WICKERSTY
KATHLEEN M. WILLIAMS
MICHAEL L. ZIEGLER*

BRIAN A. BANNON
AMY J. BEECH*
PHILIP M. BERKOWITZ*
CAROL S. BERNHEIM*
DALE E. CALLENDER*
ROBERT A. DOLINKO*
KAREN BONNIE EATON
JACK A. EIFERMAN*
THOMAS M. FARAH
LAURENCE W. FUTTERMAN*

June 15, 1984

*NOT ADMITTED WASHINGTON
**ADMITTED TEXAS ONLY

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

Re: FEC MUR 1716

Dear Mr. Steele:

We are writing to you to request an extension of time from June 27, 1984 to July 12, 1984 for respondents Robert G. Porter and American Federation of Teachers Committee on Political Education ("AFT COPE") to reply to the complaint filed in the above-noted matter.

The respondent received the complaint herein on June 12, 1984. The nature of the complaint, coupled with previous commitments of this office in other matters, renders it virtually impossible for us to prepare a proper reply within the normal 15-day reply period.

Accordingly, we hereby request an extension of time in which to file the reply of respondents Robert G. Porter and AFT COPE from June 27, 1984 to July 12, 1984.

Sincerely,

William C. Oldaker
Counsel for Respondents
Robert G. Porter and
AFT COPE

WO/LK:ses
cc: Stephen Mims



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 21, 1984

Joan Ruby, Esquire
Assistant General Counsel
Amalgamated Clothing & Textile Workers Union
15 Union Square
New York, New York 10003

Re: MUR 1716

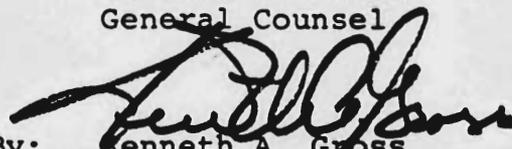
Dear Ms. Ruby:

This is in reference to your letter dated June 13, 1984, requesting an extension of 14 days to respond to the complaint filed in the above-noted matter. After considering the circumstances presented in your letter, the Commission has determined to grant you your requested extension. Accordingly, your response will be due on July 11, 1984.

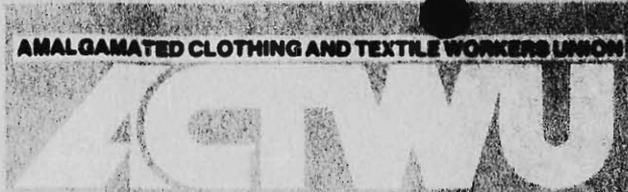
If you have any questions, please contact Peter Kynch, the staff member assigned to this matter at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

85040393819



AFL-CIO, CLC

15 UNION SQUARE • NEW YORK, N.Y. 10003
(212) 242-0700

6-CC 3664
RECEIVED AT THE FEC

MURRAY H. FINLEY
President

JACK SHEINKMAN
Secretary-Treasurer

SCOTT WILSON
Executive Vice President

JUN 18 PT: 11:16

4 JUN 18 P 3: 27

June 13, 1984

Certified Mail No. P17 2894289

Peter Knych, Esq.
Office of General Counsel
Federal Election Commission
1325 "K" Street, N.W.
Washington, D.C. 20463

Re: MUR 1716

Dear Mr. Knych:

Please accept this letter as designation of Joan Ruby, Barbara Carey and George Kirschenbaum as Counsel in MUR 1716 for Amalgamated Clothing and Textile Workers Union PAC (ACTWU-PAC) and George Solomons, Assistant Treasurer, ACTWU-PAC.

On behalf of ACTWU-PAC and George Solomons, I respectfully request an extension of time to submit a response to MUR 1716 received on June 12, 1984. Due to ACTWU's triennial convention in Florida the week of June 11, and my unavailability the following week, a two week extension of time until July 11, 1984 is needed to gather the relevant information to submit a response.

Thank you for your consideration of this request.

Very truly yours,

Joan Ruby
Joan Ruby
Assistant General Counsel

JR/pb

cc: Arthur M. Goldberg
George A. Kirschenbaum
Barbara Carey

VICE PRESIDENTS

JOHN ALLEBUZZO
SAMUEL J. AZZINARO
KILMER CABAN
LES CALDER
FRANK CALICIA
CHARLES BUD CLARK

ED CLARK
JEAN-MARC COUTURE
OLGA DIAZ
JAMES DILLON
HENRY DROPKIN
BRUCE DUNTON
GARRY FERRARIS
JOHN FOX

SAM FOX
ANGELO G. GEORGIAN
HARRY GORDON
MARION E. GROCE
NICHOLAS GYORY
WILLIAM HALL
JOSEPH HUIGHE
JAMES JACKSON

JAMES A. JOHNSON
ARTHUR LOEVY
RICHARD MacFADYEN
JOYCE D. MILLER
VERA MILLER
MURRAY MORENO
FRANK NICHOLAS JR.
CARMEN PAPALE

BRUCE RAYNOR
CHARLES SALLEE
LEON SPITZER
PETER J. SWOBODA
CECIL TOPPIN
JIM WALRAVEN

86040783820

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
GCC #4822
84 SEP 24 P12:30

MUR 1716

NAME OF COUNSEL: William C. Oldaker, Esq.

ADDRESS: Epstein, Becker, Borsody & Green
1140 Nineteenth Street, N.W., Suite 900
Washington, D.C. 20036

TELEPHONE: (202) 861-0900

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.

9-6-84
Date

Jules Glazer
Signature

RESPONDENT'S NAME: Jules Glazer

ADDRESS: c/o Brown For U.S. Senate Committee
1125 West Sixth Street
Los Angeles, California 90017

HOME PHONE: _____

BUSINESS PHONE: (213) 977-1313

86040303822

4 SEP 24 P 3: 58

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1716

NAME OF COUNSEL: William C. Oldaker, Esq.

ADDRESS: Epstein, Becker, Borsody & Green
1140 Nineteenth Street, N.W., Suite 900
Washington, D.C. 20036

TELEPHONE: (202) 861-0900

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.

8/28/84
Date


Signature

RESPONDENT'S NAME: Edmund G. Brown Jr.

ADDRESS: c/o Brown For U.S. Senate Committee
1125 West Sixth Street
Los Angeles, California 90017

HOME PHONE: _____

BUSINESS PHONE: (213) 977-1313

86040563823

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RECEIVED AT THE FEC
SEP 24 1984
F12:30

EPSTEIN BECKER BORSODY & GREEN, P. C.

ATTORNEYS AT LAW
1140 19TH STREET, N. W.
WASHINGTON, D. C. 20036

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

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FCC
6604 3895

84 JUL 2 9:33

MUR 1716

NAME OF COUNSEL: LEO GEFENER

ADDRESS: 3055 Wilshire Boulevard

Suite 900

Los Angeles, CA 90010

TELEPHONE: (213) 487-1520

JUL 1 12:54

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.

85040563820

6/26/84
Date

William Zimmerman
Signature

RESPONDENT'S NAME: Political Action Council of Educators and
William Zimmerman

ADDRESS: 2511 West Third Street

Los Angeles, CA 90057

HOME PHONE: (818) 883-4858

BUSINESS PHONE: (213) 487-1520

Geffner & Satzman

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

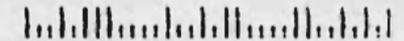
SUITE 900

55 WILSHIRE BOULEVARD
LOS ANGELES, CALIFORNIA 90010

Federal Election Commission
1325 "K" Street, N.W.
7th floor - Office of the Gen. Counsel
Washington, DC 20463

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84 JUL 2 9:33
CALIF

860403682



6003662

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC

MUR 1716

JUN 18 8:28

84 JUN 18 12:55

NAME OF COUNSEL: Joan Ruby, Barbara Jane Cary, George Kirshenbaum

ADDRESS: ACTWU
15 Union Sq. West
New York, New York 10003

TELEPHONE: (212) 242-0700

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.

June 12, 1984
Date

Signature

RESPONDENT'S NAME: ACTWU - PAC

ADDRESS: 15 Union Square West
New York, New York 10003

HOME PHONE: _____

BUSINESS PHONE: (212) 242-0700

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AFL-CIO, CLC

15 UNION SQUARE • NEW YORK N.Y. 10003 3377



JUN 10 1978



Peter Knych, Esquire
Office of the General Counsel
Federal Election Commission
1325 K. Street N.W.
Washington D.C.

20403

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84 SEP 6 P12: 37
3037

EPSTEIN BECKER EORSODY & GREEN, P. C.

ATTORNEYS AT LAW

1140 19TH STREET, N. W.

WASHINGTON, D. C. 20036

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

RECEIVED AT THE FEC

84 AUG 28 AM: 55

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1716

NAME OF COUNSEL: William Oldaker, Esq.

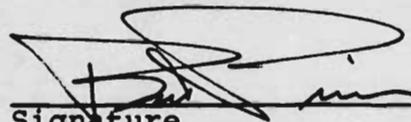
Epstein, Becker, Borsody & Green
1140 19th Street N.W.
Washington, D.C. 20036

TELEPHONE: (202) 861-0900

GCC
#4487

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.

August 22, 1984
Date


Signature

RESPONDENT'S NAME: Burt Pines

ADDRESS: 1880 Century Park East
12th Floor
Los Angeles, CA 90067

HOME PHONE: --

BUSINESS PHONE: (213) 277-1226

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84 AUG 28 P 2: 00

RECEIVED
GENERAL COUNSEL

86040563833

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

34 AUG 28 P 2:00

WASHINGTON
AUG 27 '61

U.S. POSTAGE
ONE FIVE
= 0.20
POSTAGE PAID
AUG 27 '61

EPSTEIN BECKER BORSODY & GREEN, P. C.

ATTORNEYS AT LAW
1140 19TH STREET, N. W.
WASHINGTON, D. C. 20036

Mr. Gary Johansen
Federal Election Commission
1325 K Street, N.W.
7th Floor
Washington, D.C. 20463

GEFFNER & SATZ
3055 WILSHIRE BLVD SUITE 900
LOS ANGELES CA 90010-19AM

Western Union Mailgram 

4-0526498201 07/19/84 ICS 15PMRNG CSP WMOB
2134981520 MGMB TDRN LOS ANGELES CA 85 07-19 0605P EST

*GCC
#4100*

Krych

KENNETH A GROSS
ASSOCIATE GENERAL COUNSEL FEDERAL ELECTION
COMMISSION
1325 K ST NORTHWEST, 7TH FL
WASHINGTON DC 20463

RE MUR1716

RECEIVED YOUR EXTENSION TO JULY 21 TO RESPOND TO COMPLAINT IN ABOVE
MATTER. YOUR LETTER RECEIVED IN LOS ANGELES ON THURSDAY, JULY 19,
ALTHOUGH REQUEST WAS MADE JULY 6. THE UNDERSIGNED IS IN BAL HARBOUR
FLORIDA ON CONVENTION BUSINESS AND WILL NOT RETURN TO LOS ANGELES
UNTIL JULY 21. REQUEST EXTENSION OF TIME TO FILE RESPONSE TO AUGUST 1
1984.

LEO GEFFNER
GEFFNER AND SATZMAN

18107 EST

MGMCOMP

10:01V 03 NIT

5241 (R 7/82)

RECEIVED
6044 3849
84 JUN 28 9:07

Edmund G. Brown Jr.

(213) 977-1313

June 25, 1984

Mr. Peter Knych
Office of General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

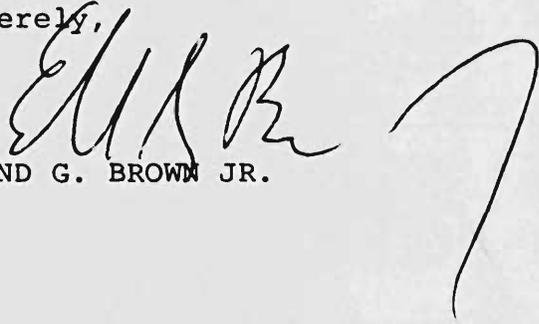
Re: MUR 1716
JAMES EDWARD ANTOSH v.
EDMUND G. BROWN JR.

Dear Mr. Knych:

So that counsel representing me may properly comply with your request for response to the above-entitled action, please extend your deadline for written response to July 11.

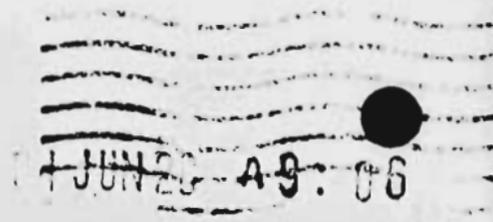
Enclosed please find the Statement of Designation of Counsel.

Sincerely,



EDMUND G. BROWN JR.

86040706835



Mr. Peter Knych
Office of General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463



RECEIVED AT THE FEC

20 JUN 84 8:39

LAW OFFICES OF
ALSCHULER, GROSSMAN & PINES

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

TWELFTH FLOOR, 1880 CENTURY PARK EAST

LOS ANGELES, CALIFORNIA 90067-1884

TELEPHONE (213) 277-1226

OF COUNSEL
BENJAMIN F. SCHWARTZ
RICHARD H. MILLEN*
MAURICE MAC GOODSTEIN
IRVING KELLOGG*

CABLE: SAGELAW
TELEX: 910-490-2114
TELECOPIER:
(213) 552-6077

June 15, 1984

GCC #3690

OUR FILE NO.

LEON S. ALSCHULER*
MARSHALL S. GROSSMAN*
BURT PINES*
MELVYN B. FLIEGEL*
BRUCE WARNER*
MARCO F. WEISS*
HENRY S. ZANOWILL*
FRANK KAPLAN*
BRUCE S. ROSS*
HOWARD WOLLITZ*
MICHAEL J. BRILL*
KAREN KAPLOWITZ*
ROBERT A. SHLACHTER*
ROBERT S. OWENS
WILLIAM S. SMALL
HORTON R. FIELD
DENNIS A. KAHAN
PAUL H. ROCHMES
LINDA S. GACH
SANDRA J. CHAN
LINDA BUTTON
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MICHAEL A. SHERMAN
CHERYL S. FEIGENSON
MICHAEL L. CYBERS
PETER J. COHEN
RIM ROBERT MAEROWITZ
JOHN A. SCHWIMMER
*A PROFESSIONAL CORPORATION

Mr. Peter Knych
Federal Election Commission
Washington, D.C. 20463

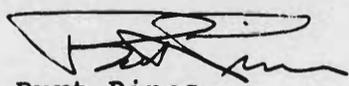
Re: Antosh v. Edmund G. Brown, Jr., et al.
Complaint No. MUR 1716

Dear Mr. Knych:

This confirms our telephone conversation yesterday wherein you granted me a thirty-day extension to and including July 30, 1984 to respond to the above-referenced complaint.

Thank you for your courtesy in this matter.

Very truly yours,


Burt Pines

BP:dw

86040366837

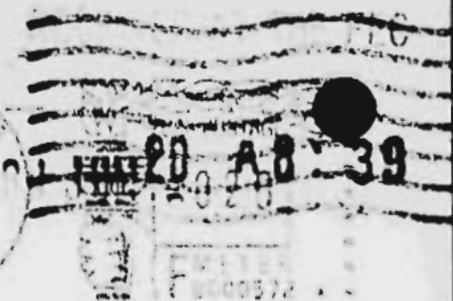
JUN 20 1984 9:21

LAW OFFICES OF
ALSCHULER, GROSSMAN & PINES

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

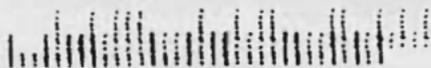
TWELFTH FLOOR, 1880 CENTURY PARK EAST

LOS ANGELES, CALIFORNIA 90067-1694



Mr. Peter Knych
Federal Election Commission
Washington, D.C. 20463

6040563838



EPSTEIN BECKER BORSODY & GREEN, P.C.
ATTORNEYS AT LAW

1140 19TH STREET, N.W.
WASHINGTON, D. C. 20036
(202) 861-0900

250 PARK AVENUE
NEW YORK, NEW YORK 10177
(212) 370-9800

MALICK TOWER
ONE SUMMIT AVENUE
FORT WORTH, TEXAS 76102¹
(817) 334-0701

235 MONTGOMERY STREET
SAN FRANCISCO, CALIFORNIA 94104¹
(415) 398-8888

1875 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067
(213) 556-8861

STEVEN M. CARSEY^{**}
EDWIN N. EPSTEIN
ARNOLD R. LEVY^{*}
JAMES P. MULKEEN
WILLIAM C. OLDAKER
DONALD PARTLAND^{*}
FREDERICK E. SMITHLINE^{*}
SIDNEY TODRES^{*}
OF COUNSEL

JEFFREY H. BECKER
ROBERT P. BORSODY
LAURENCE K. BROWN^{*}
WILLIAM A. CARMELL^{*}
STEVEN B. EPSTEIN
STUART M. GERSON
GILBERT J. GINSBURG
RONALD N. GREEN
KENNETH HARFENIST^{*}
WILLIAM A. HELVESTINE^{*}
GREGORY K. NIESTAND^{*}
ROBERT L. JAVVTIS^{*}
WILLIAM G. KOPIT
FRANK C. MORRIS, JR.
JOSEPH P. PARKER^{**}
SUSAN SCHENKEL-SAVITT^{*}
FRANKLIN R. SEARS^{**}
RICHARD G. VERNON

JEAN M. GALLOWAY
PHILIP M. GASSEL^{*}
PETER B. GRAY
DOUGLAS A. HASTINGS
LISA B. HOROWITZ
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LISL E. KING
SANDRA R. KING
DENNIS A. LALLI^{*}
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JUDAH LIFSCHITZ
DAVID C. MAIN, JR.
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ROBERT J. NOSES
JOY D. OBERMAN^{*}
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RICHARD J. REIBSTEIN^{*}
ROBERT D. REIF
DONALD G. SHALHOUB
LYNN E. SHAPIRO
RICHARD L. STEER^{*}
LINDA V. TIANO^{*}
KENNETH S. WECKSTEIN
RANDALL G. WELLS^{*}
TERESA M. WICKERSTY
KATHLEEN M. WILLIAMS
MICHAEL L. ZIEGLER^{*}

June 15, 1984

^{*}NOT ADMITTED WASHINGTON
^{**}ADMITTED TEXAS ONLY

¹P. C. NEW YORK AND
WASHINGTON, D. C. ONLY

860405039339

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

Re: FEC MUR 1716

Dear Mr. Steele:

We are writing to you to request an extension of time from June 27, 1984 to July 12, 1984 for respondents Robert G. Porter and American Federation of Teachers Committee on Political Education ("AFT COPE") to reply to the complaint filed in the above-noted matter.

The respondent received the complaint herein on June 12, 1984. The nature of the complaint, coupled with previous commitments of this office in other matters, renders it virtually impossible for us to prepare a proper reply within the normal 15-day reply period.

Accordingly, we hereby request an extension of time in which to file the reply of respondents Robert G. Porter and AFT COPE from June 27, 1984 to July 12, 1984.

Sincerely,

William C. Oldaker
Counsel for Respondents
Robert G. Porter and
AFT COPE

WO/LK:ses
cc: Stephen Mims

01:07

60A 3977

Geffner & Satzman

A Professional Corporation

3055 Wilshire Boulevard, Suite 900
Los Angeles, California 90010
(213) 487-1520 • (213) 531-9724

REC'D
OF COUNSEL
Michael Smolen
Leslie J. Garber
Joseph Pogner
Martin S. Bakst
Bruce B. Johnson
04 JUL 18 1984

Attorneys at Law

Leo Geffner
Barry Satzman
Irwin L. Goldstein
Michael Pösner
Howard Z. Rosen
Jeffrey Paule

Helena Sunny Wise
Ruben Scott

E. Alain Levi
Philip H. Smith
Leland Rosner

Judge (Ret.) William S. Hassen
Louis Rimbach
Diana Denton

July 6, 1984

Mr. Kenneth A. Gross
Associated General Counsel
Federal Election Commission
1325 K Street, N.W., 7th Floor
Washington D.C. 20463

RE: Political Action Council of Educators
and William Zimmerman - United Teachers Los Angeles -
MUR 1716

Dear Mr. Gross:

I recently filed a statement of designation of counsel that this office will represent the Political Action Council of Educators of the United Teachers Los Angeles and William Zimmerman concerning the above Complaint.

I am requesting an extension of time in which to file a response to the Complaint. At this time, I am attempting to obtain all the necessary information regarding the allegations in the Complaint. I am coordinating our response with the American Federation of Teachers. I have been in consultation with Bill Oldaker, who represents the AFT and also requested an extension of time to file a response.

I would appreciate a thirty day extension to file a response.

Thank you for your cooperation.

Very truly yours,

LEO GEFFNER
LG:lam/70A20

cc: Judy Solkovitz, President
United Teachers Los Angeles

William Zimmerman
United Teachers Los Angeles

William Oldaker, Atty

06040503840

1119 12:50



ffner & Slatzman

PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

SUITE 900
SHIRE BOULEVARD
ELES, CALIFORNIA 90010

(1-21)

23 JUL 8 08:18



RECEIVED JUL 23 1980

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1716

NAME OF COUNSEL: Mr. Roger Loomis & Ms. Cynthia Thornton

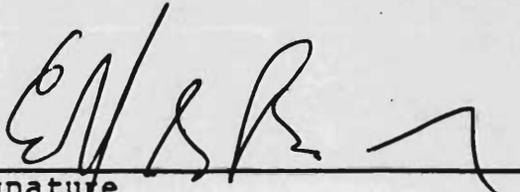
ADDRESS: Reavis and McGrath
700 South Flower Street, 6th Floor
Los Angeles, CA 90017

TELEPHONE: (213) 626-5241

JUN 28 AIO: 10

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.

June 25, 1984
Date


Signature

RESPONDENT'S NAME: Edmund G. Brown Jr.

ADDRESS: 1125 West Sixth Street, Third Floor
Los Angeles, CA 90017

HOME PHONE: (213) 650-6364

BUSINESS PHONE: (213) 977-1313

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STATEMENT OF DESIGNATION OF COUNSEL

600 #
3832

MUR 1716

NAME OF COUNSEL: William C. Oldaker, Esq.

ADDRESS: Epstein, Becker, Borsody, & Green
1140 19th Street, NW, Suite 900
Washington, DC 20036

TELEPHONE: (202) 861-0900

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.

6-21-84
Date

Robert S. Porter
Signature

RESPONDENT'S NAME: Robert Porter, Secretary-Treasurer

ADDRESS: American Federation of Teachers
555 New Jersey Avenue, N.W.
Washington, D.C. 20001

HOME PHONE: (301) 460-8624

BUSINESS PHONE: (202) 879-4415

86040283843

02:60 23111



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 28, 1984

Cynthia K. Thornton, Esq.
Reavis & McGrath
6th Floor Broadway Plaza
700 South Flower Street
Los Angeles, California 90017

Re: MUR 1716

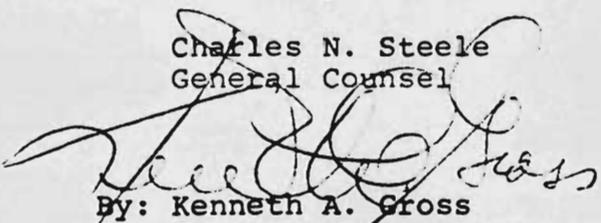
Dear Mrs. Thornton:

This is in reference to your letter dated June 22, 1984, requesting an extension of 30 days to respond to the Commission's complaint filed in the above noted matters. After considering the circumstances presented in your letter, the Commission has determined to grant you your requested extension. Accordingly, your response will be due on July 24, 1984.

If you have any questions, please contact Gary Johansen, Assistant General Counsel assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

86040366844



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Cynthia K. Thornton, Esq.
Reavis & McGrath
6th Floor Broadway Plaza
700 South Flower Street
Los Angeles, California 90017

Re: MUR 1716

Dear Mrs. Thornton:

This is in reference to your letter dated June 22, 1984, requesting an extension of 30 days to respond to the Commission's complaint filed in the above noted matters. After considering the circumstances presented in your letter, the Commission has determined to grant you your requested extension. Accordingly, your response will be due on July 24, 1984.

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

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

86040753845

MLP # 7716

DATE 6/1/84

PLEASE PROVIDE THE NAMES AND ADDRESSES OF ALL RESPONDENTS WHICH ARE TO BE SENT A COPY OF THE COMPLAINT. IF A PRINCIPAL CAMPAIGN COMMITTEE IS A RESPONDENT, A CARBON COPY IS TO BE SENT TO THE CANDIDATE. PLEASE PROVIDE THE NAME AND ADDRESS OF THE CANDIDATE AND PUT A "CC" BESIDE THE CANDIDATE'S NAME. IF A CANDIDATE IS A RESPONDENT, A CARBON COPY IS TO BE SENT TO THE CANDIDATE'S PRINCIPAL CAMPAIGN COMMITTEE. PLEASE PROVIDE THE NAME AND ADDRESS OF THE PRINCIPAL CAMPAIGN COMMITTEE AND PUT A "CC" BESIDE THE COMMITTEE'S NAME. PLEASE PROVIDE THIS INFORMATION, ON THIS SHEET, WITHIN 24 HOURS OF RECEIPT OF THIS NOTICE. THANK YOU.

- ① Edmund G. Brown, Jr.
1125 W. 6th St
Los Angeles, California 90017
- ② Burt Pines, treasurer
Brown for U.S. Senate
1125 W. 6th St.
Los Angeles, California 90017
- ③ Jules Glazer, treasurer
Brown for U.S. Senate
1125 W. 6th St.
Los Angeles, California 90017
- ④ Brown for U.S. Senate
1125 W. 6th Street
Los Angeles, California 90017
- ⑤ Robert G. Porter, treasurer
American Federation of Teachers
Committee on Political Education
11 Dupont Circle, N.W.
Washington D.C. 20036
- ⑥ American Federation of Teachers
Committee on Political Education
11 Dupont Circle N.W.
Washington, D.C. 20036
- ⑦ William Zimmerman, treasurer -
Political Action Council of Educators
2511 W. 3rd Street
Los Angeles, California 90057
- ⑧ Gerald A. Reedy, Treasurer
Political Action Council of Educators
2511 W. 3rd St
Los Angeles, California 90057
- ⑨ George Solomons, treasurer
Amalgamated Clothing and Textile
Workers Union PAC
15 Union Square
NY, NY 10003
- ⑩ Jacob Shinkman, Treasurer
Amalgamated Clothing and Textile
Workers PAC
15 Union Square
NY, NY 10003
- ⑪ Lawrence Dock, treasurer
Int. Ladies Garment Workers Union
Campaign Committee
1710 Broadway
NY, NY 10019
- ⑫ JAY MUEHR, TREASURER
Int Ladies Garment Workers Union
Campaign Committee
1710 Broadway
NY, NY 10019



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 6, 1984

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

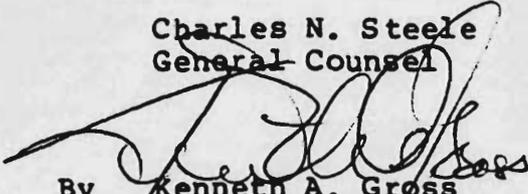
Dear Mr. Avakian and Ms. Poindexter:

This letter is to acknowledge receipt of the complaint of your client, James Edward Antosh, which we received on May 31, 1984, against Harley O. Stagger, Jr; Friends of Staggers for Congress; Robert Shank; D.A. Bobo and Responsible Citizens Political League-A project of the Brotherhood of Railway and Airline Clerks, which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondent will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your 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 Barbara A. Johnson at (202) 523-4143.

Sincerely,

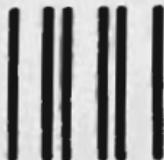
Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosure

860403847

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS



SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested"
- adjacent to number.

**PENALTY FOR PRIVATE
USE, \$300**

**RETURN
TO**



~~Federal Election Commission~~
(Name of Sender)

1325 K Street NW

(Street or P.O. Box)

Washington DC 20543

(City, State, and ZIP Code)

5 3 1 0 1 1



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 6, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jacob Sheinkman, Treasurer
Amalgamated Clothing and Workers
PAC
15 Union Square
New York, NY 10003

Re: MUR 1716

Dear Mr. Sheinkman:

This letter is to notify you that on May 31, 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 1716. 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.

9 5 0 4 0 3 8 4 9

If you have any questions, please contact Peter Knuch, 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

36040306850

Enclosures

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

MAR 17 16 KUNCH

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:** Lawrence Dock, Jr.
International Garment Workers
Union Campaign Committee
1710 Broadway
New York, NY 10019

4. TYPE OF SERVICE: <input type="checkbox"/> REGISTERED <input type="checkbox"/> INSURED <input checked="" type="checkbox"/> CERTIFIED <input type="checkbox"/> COD <input type="checkbox"/> EXPRESS MAIL	ARTICLE NUMBER 943924
---	---------------------------------

(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 <small>(may be on reverse side)</small>
----------------------------	--

6. **ADDRESSEE'S ADDRESS** (Only if requested)

7. **UNABLE TO DELIVER BECAUSE:**

* GPO: 1982-570-088

6/6/84



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 6, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jay Mazur, Treasurer
International Ladies
Garment Workers Union
Campaign Committee
1710 Broadway
New York, NY 10019

Re: MUR 1716

Dear Mr. Mazur:

This letter is to notify you that on May 31, 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 1716. 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.

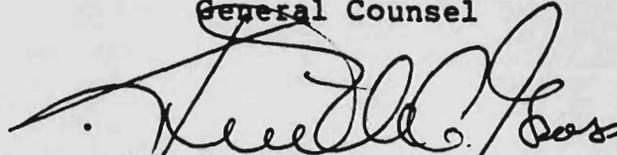
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

9 6 0 4 0 5 6 3 8 5 1

If you have any questions, please contact Peter Knych, 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

26040303852

Enclosures

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

MDR 1716 MVNCH

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:** George Solomon, Tr
Amalgamated Clothing & Textile Workers
Union PAC
15 Union Square
New York, NY 10003

4. **TYPE OF SERVICE:**

REGISTERED INSURED

CERTIFIED COD

EXPRESS MAIL

ARTICLE NUMBER
943926

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

Deukowicz

5. **DATE OF DELIVERY**

POSTMARK
(Stamp on reverse side)
JUN 11 1984

6. **ADDRESSEE'S ADDRESS** (Only if requested)

7. **UNABLE TO DELIVER BECAUSE:**

No. EMPLOYEE'S
7415

6/6/84

* GPO: 1983-379-603



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 6, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lawrence Dock, Treasurer
International Garment Workers
Union Campaign Committee
1710 Broadway
New York, NY 10019

Re: MUR 1716

Dear Mr. Dock:

This letter is to notify you that on May 31, 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 1716. 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.

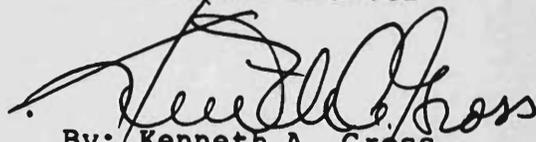
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

96040303853

If you have any questions, please contact Peter Knych, 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

86040363854

Enclosures

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

mur 1716 Knuch

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:** Jay Mayer, Tr.
International Ladies Garment Workers
Union Campaign Committee
1710 Broadway
New York, NY 10019

4. **TYPE OF SERVICE:**

REGISTERED INSURED

CERTIFIED COB

EXPRESS MAIL

ARTICLE NUMBER
943925

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

Al Kumber

5. **DATE OF DELIVERY**

6. **ADDRESSEE'S ADDRESS (only if requested)**

7. **UNABLE TO DELIVER BECAUSE:**

NEW YORK
JUN 11 1984

6/6/84

● GPO: 1983-570-503



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 6, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George Solomons, Treasurer
Amalgamated Clothing and
Textile Workers Union PAC
15 Union Square
New York, NY 10003

Re: MUR 1716

Dear Mr. Solomon:

This letter is to notify you that on May 31, 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 1716. 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.

86040503852

If you have any questions, please contact Peter Knych, 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

86040383855

Enclosures

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

MUR 1716 Kynch

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:** Jacob Sheinkman, Jr.
Amalgamated Clothing and Workers
PAC
15 Union Square
New York NY 10003

4. **TYPE OF SERVICE:** REGISTERED INSURED **ARTICLE NUMBER**
 CERTIFIED COD **943923**
 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**
(May be on reverse side)

6. **ADDRESSEE'S ADDRESS (Only if requested)** _____

7. **UNABLE TO DELIVER BECAUSE:** _____ **7c. EMPLOYEE'S INITIALS**
[Handwritten Initials]

* GPO: 1982-679-000

6/6/84

RETURN RECEIPT



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 6, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gerald A. Reedy, Treasurer
Political Action Council of
Educators
2511 West Third Street
Los Angeles, California 90057

Re: MUR 1716

Dear Mr. Reedy:

This letter is to notify you that on May 31, 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 1716. 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.

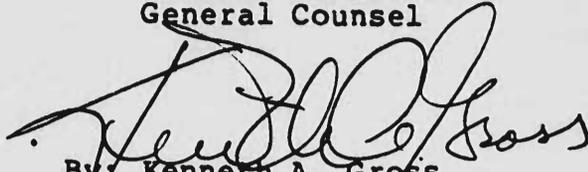
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

8604058357

If you have any questions, please contact Peter Knych, 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

86040563858

Enclosures

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

MUR 1716 Knuch

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:** Wm Zimmerman, Jr
Political Action Council of
Educator
2511 W. 3rd St.
LOS ANGELES CA 90057

4. **TYPE OF SERVICE:**

REGISTERED INSURED

CERTIFIED COD

EXPRESS MAIL

ARTICLE NUMBER
943921

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

Go. [Signature]

5. **DATE OF DELIVERY**
JUN 11 1984

6. **ADDRESSEE'S ADDRESS** (Only if restricted)

7. **UNABLE TO DELIVER BECAUSE:**

POSTMARK
(may be on change side)

JUN 11 1984

RETURN RECEIPT

* GPO: 1983-070-008

6/6/84



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 6, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William Zimmerman, Treasurer
Political Action Council of Educators
2511 West Third Street
Los Angeles, California 90057

Re: MUR 1716

Dear Mr. Zimmerman:

This letter is to notify you that on May 31, 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 1716. 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.

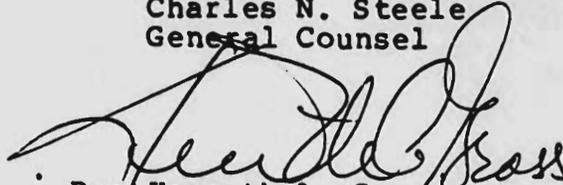
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

85040503359

If you have any questions, please contact Peter Knuch, 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

86040583860

Enclosures

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

MUR 1716 Knuch

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 \$ 5.00

3. **ARTICLE ADDRESSED TO:** Gerald A. Reedy, Jr.
Political Action Council of Educators
2811 W. 3rd Street
Los Angeles, CA 90057

4. **TYPE OF SERVICE:**

REGISTERED INSURED

CERTIFIED COD

EXPRESS MAIL

ARTICLE NUMBER
943922

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized Agent

G. A. Reedy, Jr.

5. **DATE OF DELIVERY**
JUL 11 1984

6. **ADDRESSEE'S ADDRESS** (Only if requested)

7. **UNABLE TO DELIVER BECAUSE:**

8. **EMPLOYEE'S INITIALS**

LOS ANGELES POST OFFICE
JUL 11 1984

* GPO: 1985-570-628

6/6/84

RETURN RECEIPT



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 6, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert G. Porter, Treasurer
American Federation of Teachers
Committee on Political Education
11 Dupont Circle, N.W.
Washington, D.C. 20036

Re: MUR 1716

Dear Mr. Porter:

This letter is to notify you that on May 31, 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 1716. 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.

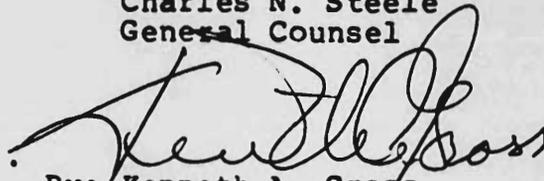
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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1

If you have any questions, please contact Peter Knych, 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

86040783862

Enclosures

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

MUR 1716 KUNCH

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:** Robert G. Porter
American Federation of Teachers Cmte
ON Political Education
11 Dupont Circle NW
Wash DC 20036

4. **TYPE OF SERVICE:**

REGISTERED INSURED

CERTIFIED COD

EXPRESS MAIL

ARTICLE NUMBER
943920

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

5. DATE OF DELIVERY
6-12-84

6. ADDRESSEE'S ADDRESS (Only if restricted)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

POSTMARK
12
1984

* GPO: 1983-379-003

6/6/84

RETURN RECEIPT



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 6, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jules Glazer, Treasurer
Brown for U.S. Senate
1125 W. Sixth Street
Los Angeles, California 90017.

Re: MUR 1716

Dear Mr. Glazer:

This letter is to notify you that on May 31, 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 1716. 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.

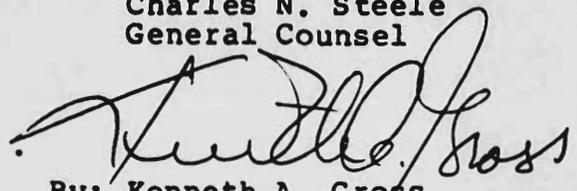
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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.

If you have any questions, please contact Peter Knych, 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

86040503864

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

MUR 1716 Knych

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:** Jules Glazer, Tr.
Brown For U.S. Senate
1125 W. Sixth Street
Los Angeles, CA 90017

4. **TYPE OF SERVICE:**

REGISTERED INSURED

CERTIFIED COD

EXPRESS MAIL

ARTICLE NUMBER
943919

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

Kathy Daniel

5. **DATE OF DELIVERY** **POSTMARK**
(may be on reverse side)

JUN 11 1984

6. **ADDRESSEE'S ADDRESS** (only if requested)

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

6/6/84

• GPO: 1983-070-003



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 6, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Burt Pines, Treasurer
Brown for U.S. Senate
1125 W. Sixth Street
Los Angeles, California 90017

Re: MUR 1716

Dear Mr. Pines:

This letter is to notify you that on May 31, 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 1716. 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.

86040503865

If you have any questions, please contact Peter Knych, 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

95040738666

MUR 1714 KUNCH

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:** Burt Pines, Jr.
Brown for U.S. Senate
1105 W. Sixth Street
Los Angeles, CA 90017

4. **TYPE OF SERVICE:**

REGISTERED INSURED

CERTIFIED COD

EXPRESS MAIL

ARTICLE NUMBER
943918

(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
(may be on reverse side)

6. **ADDRESSEE'S ADDRESS** (Only if requested)

7. **UNABLE TO DELIVER BECAUSE:**

7a. EMPLOYEE'S INITIALS

6/6/84

* GPO: 1982-278-003



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 6, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable Edmund G. Brown, Jr
1125 W. Sixth Street
Los Angeles, California 90017

Re: MUR 1716

Dear Mr. Brown:

This letter is to notify you that on May 31, 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 1716. 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.

860405867

If you have any questions, please contact Peter Knych, 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

86040703868

MUR 1716 Hunch

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: The Honorable Edmund G. Brown, Jr.
1125 W. Sixth Street
Los Angeles, CA 90017

4. TYPE OF SERVICE: ARTICLE NUMBER

REGISTERED INSURED

CERTIFIED COD 943917

EXPRESS MAIL

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

Barbara Dancel

5. DATE OF DELIVERY POSTMARK (only on reverse side)

JUN 1984

6. ADDRESSEE'S ADDRESS (only if requested)

7. UNABLE TO DELIVER BECAUSE: EMPLOYEE'S INITIALS

RETURN RECEIPT

6/6/84

NOR ASSIGNMENT FORM

NOR # 1716

Date Received 6/1/84

COMPLAINANT James E. Antosh by Michael Avakian and Martha Poindexter

RESPONDENT Edmund G. Brown, Jr., Brown for U.S. Senate, American Federation of Teachers, Committee on Political Education, et al

TRACK ASSIGNED _____

FINAL REVIEW BY: A.G.C. G.C.

STAFF ASSIGNED ~~AD Curry~~ Peter Kruech

DATE June 1, 1984

DUE DATE OF FIRST G.C. REPORT 12 days
today

Kur
Signature of G.C.

6/1/84
date

Please return to Docket after assignment.

86040503869

BCC #3390

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

1
P10: 53

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

v.)

Complaint
MUR No. 1716

Edmund G. Brown, Jr.; Brown for)
U.S. Senate; American Federation)
of Teachers, Committee on)
Political Education and its)
affiliated separate segregated)
fund, Political Action Council)
of Educators; Amalgamated)
Clothing and Textile Workers)
Union Political Action Committee;)
International Ladies Garment)
Workers Union Campaign Committee,)
and all the Committees')
treasurers,)
Respondents.)

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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, Edmund G. Brown, Jr.; Brown for U.S. Senate; American Federation of Teachers, Committee on Political Education ("AFT-COPE") and its affiliated separate segregated fund ("SSF"), Political Action Council of Educators ("PACE"); Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC"); International Ladies Garment Workers Union Campaign Committee ("ILGWUCC") 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) during either the general or the primary election cycles.

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. Edmund G. Brown, Jr.,

1125 W. Sixth Street
Los Angeles, California 90017 and,

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630 Shatto Place
Los Angeles, California 90005.

- b. Burt Pines, individually and in his capacity as treasurer of Brown for U.S. Senate,

1125 W. Sixth Street
Los Angeles, California 90017 and,

630 Shatto Place
Los Angeles, California 90005.

- c. Jules Glazer, individually and in his capacity as treasurer of Brown for U.S. Senate,

1125 W. Sixth Street
Los Angeles, California 90017 and,

630 Shatto Place
Los Angeles, California 90005.

- d. Brown for U.S. Senate,

1125 W. Sixth Street
Los Angeles, California 90017 and,

630 Shatto Place
Los Angeles, California 90005.

- e. Robert G. Porter, individually and in his capacity as treasurer of American Federation of Teachers, Committee on Political Education,
11 Dupont Circle, N.W.
Washington, D.C. 20036.

- f. American Federation of Teachers, Committee on Political Education,
11 Dupont Circle, N.W.
Washington, D.C. 20036.

- g. William Zimmerman, individually and in his capacity as treasurer of Political Action Council of Educators,
2511 W. 3rd Street
Los Angeles, California 90057.

- h. Political Action Council of Educators,
2511 W. 3rd Street
Los Angeles, California 90057.

- 8604038873
- i. George Solomons, individually and in his capacity as treasurer of Amagamated Clothing and Textile Workers Union Political Action Committee,
15 Union Square
New York, New York 10003.
 - j. Amagamated Clothing and Textile Workers Union Political Action Committee,
15 Union Square
New York, New York 10003.
 - k. Lawrence Dock, individually and in his capacity as treasurer of International Ladies Garment Workers Union Campaign Committee,
1710 Broadway
New York, New York 10019.
 - l. International Ladies Garment Workers Union Campaign Committee,
1710 Broadway
New York, New York 10019.

III. LIABILITY

3. Liability may be imposed upon the candidate, Edmund G. Brown, Jr.; Brown for U.S. Senate; AFT-COPE and its affiliated SSF, PACE; ACTWU-PAC; and ILGWUCC pursuant to 2 U.S.C. §441a(a) which establishes the \$5,000.00 (FIVE THOUSAND DOLLAR) 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 AFT-COPE and its affiliated SSF, PACE, 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 primary election or an excess of \$5,000.00 (FIVE THOUSAND DOLLARS) for the 1982 federal general in which Edmund G. Brown, Jr. 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 Edmund G. Brown, Jr.; Brown for U.S. Senate; AFT-COPE and its affiliated SSF, PACE; and ACTWU-PAC filed for the 1982 federal primary election; and which Edmund G. Brown, Jr., Brown for U.S. Senate and ILGWUCC filed for the 1982 federal general election.

7. For the 1982 federal primary election, excessive funds were contributed to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer by AFT-COPE and its treasurer; PACE and its treasurer; and ACTWU-PAC and its treasurer. For the 1982 federal general election, excessive funds were contributed to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer by ILGWUCC and its treasurer.

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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
BROWN FOR U.S. SENATE IN THE
1982 FEDERAL PRIMARY AND GENERAL ELECTIONS**

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, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal primary election from AFT-COPE and its affiliated SSF, PACE, in the amount of \$11,425.00 (ELEVEN THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLARS).

10. Candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, for the 1982 federal primary election, accepted contributions from AFT-COPE and its affiliated SSF, PACE, in the following amounts:

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<u>Date Received</u>	<u>Amount</u>	<u>Contributor</u>	<u>F.E.C. Microfilm Location</u>
7/14/81	\$1,000.00	PACE	82020032018
4/15/82	\$1,000.00	PACE	82020071976
6/5/82	\$5,000.00	AFT-COPE	82020103644
8/18/82	<u>\$4,425.00</u>	AFT-COPE	82020154239
Total	\$11,425.00		

11. A running total of the amount of contributions received from AFT-COPE and its affiliated SSF, PACE, would have put on notice Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer that they had received \$2,000.00 (TWO THOUSAND DOLLARS) on April 15, 1982. On that date, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer were only permitted to accept an additional contribution of \$3,000.00 (THREE THOUSAND 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.

12. PACE and its treasurer failed to designate whether the \$1,000.00 (ONE THOUSAND DOLLAR) contribution made on April 5, 1982 was intended for the primary or the general election. (See F.E.C. Microfilm # 82032421201). However, the contribution was made more than two months before the California Congressional primary election which was held on June 8, 1982. Therefore, the contribution is considered a contribution for the primary election in accordance with 11 C.F.R. §110.1(a)(2)(ii)(A).

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In violation of 11 C.F.R. §104.14(d), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer failed to designate whether the contribution was for the primary or the general election. (See F.E.C. Microfilm # 8200071976). 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 or statement contained therein."

13. Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer failed to accurately report the \$4,425.00 (FOUR THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLAR) contribution of May 26, 1982 which was designated by AFT-COPE as a contribution for the primary election. (See F.E.C. Microfilm # 82032404238). In violation of 11 C.F.R. §104.14(d), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer reported it as a contribution for the general election. (See F.E.C. Microfilm # 82020154239). 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 or statement contained therein." Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer knowingly misreported the contribution in order to accept contributions in excess of the statutory limit.

14. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable

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amendments, which Respondents filed with the Federal Election Commission, Complainant believes that candidate for public office, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal primary election from ACTWU-PAC in the amount of \$6,000.00 (SIX THOUSAND DOLLARS).

15. Candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, for the 1982 federal primary election, accepted contributions from ACTWU-PAC in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>F.E.C. Microfilm Location</u>
5/27/82	\$5,000.00	82020103644
11/4/82	<u>\$1,000.00</u>	82020191641
Total	\$6,000.00	

16. A running total of contributions from ACTWU-PAC would have put on notice Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer that they had received \$5,000.00 (FIVE THOUSAND DOLLARS) on May 27, 1982. On that date, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer could no longer lawfully accept any contributions from ACTWU-PAC. In violation of 2 U.S.C. §441a(f), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer accepted a contribution from this contributor in the amount of \$1,000.00 (ONE THOUSAND DOLLARS). This amount

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exceeded the statutory monetary ceiling by \$1,000.00 (ONE THOUSAND DOLLARS).

17. Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer failed to accurately report the \$1,000.00 (ONE THOUSAND DOLLAR) contribution of October 18, 1982 which was designated by ACTWU-PAC as a contribution for the primary election. (See F.E.C. Microfilm # 82032583602). In violation of 11 C.F.R. §104.14(d), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer reported it as a contribution for the general election. (See F.E.C. Microfilm #82020191641). 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 or statement contained therein." Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer knowingly misreported the contribution in order to accept contributions in excess of the statutory limit.

18. 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, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal general election from ILGWUC in the amount of \$6,000.00 (SIX THOUSAND DOLLARS).

19. Candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, for the 1982 federal general election, accepted contributions from ILGWUC in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>F.E.C. Microfilm Location</u>
9/29/82	\$4,000.00	82020154242
10/8/82	\$1,000.00	82020154504
10/8/82	<u>\$1,000.00</u>	82020154504
Total	\$6,000.00	

20. A running total of contributions from ILGWUC would have put on notice Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer that they had received \$4,000.00 (FOUR THOUSAND DOLLARS) on September 29, 1982. On that date, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer were only permitted to accept an additional contribution of \$1,000.00 (ONE THOUSAND DOLLARS). In violation of 2 U.S.C. §441a(f), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer accepted two contributions from this contributor in the amounts of \$1,000.00 (ONE THOUSAND DOLLARS). This amount exceeded the statutory monetary ceiling by \$1,000.00 (ONE THOUSAND DOLLARS).

**VI. VIOLATIONS OF THE F.E.C.A. BY
AFT-COPE AND PACE IN THE
1982 FEDERAL PRIMARY ELECTION**

21. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable

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amendments, which Respondents filed with the Federal Election Commission, the Complainant believes that AFT-COPE and its affiliated SSF, PACE, for the 1982 federal primary election contributed to candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer a total of \$11,425.00 (ELEVEN THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLARS).

22. AFT-COPE and PACE contributed the following amounts:

a. On July 2, 1981, PACE contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 81032092497).

b. On April 5, 1982, PACE contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032421201).

c. On May 26, 1982, AFT-COPE contributed \$5,000.00 (FIVE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032361583).

d. On May 26, 1982, AFT-COPE contributed \$4,425.00 (FOUR THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLARS). (See F.E.C. Microfilm # 82032404238).

23. A running total of contributions made to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer would have put on notice AFT-COPE and its affiliated SSF, PACE, that as of April 5, 1982, they had contributed \$2,000.00 (TWO THOUSAND DOLLARS) and that they could only contribute an additional \$3,000.00 (THREE THOUSAND DOLLARS) if they 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 DOLLAR) contribution and a \$4,425.00 (FOUR THOUSAND

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FOUR HUNDRED TWENTY-FIVE DOLLAR) contribution was made to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer. This amount exceeded the statutory monetary ceiling by \$6,425.00 (SIX THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLARS).

24. PACE and its treasurer failed to accurately report the \$1,000.00 (ONE THOUSAND DOLLAR) contribution of July 2, 1981 and the \$1,000.00 (ONE THOUSAND DOLLAR) contribution of April 5, 1982. In violation of 11 C.F.R. §104.14(d), PACE and its treasurer failed to designate whether the contributions were intended for the primary or the general election. (See F.E.C. Micro-film #s 81032092497 and 82032421201). Since the contributions were made before the California Congressional primary election which was held on June 8, 1982, they are considered contributions for the primary election in accordance with 11 C.F.R. §110.1(a)(2)(ii)(A). 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 or statement contained therein."

**VII. VIOLATIONS OF THE F.E.C.A. BY
ACTWU-PAC IN THE
1982 FEDERAL PRIMARY ELECTION**

25. 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 ACTWU-PAC for the 1982 federal primary election contributed to candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer a total of \$6,000.00 (SIX THOUSAND DOLLARS).

26. ACTWU-PAC contributed the following amounts:

a. On May 17, 1982, ACTWU-PAC contributed \$5,000.00 (FIVE THOUSAND DOLLARS). (See F.E.C. Microfilm # 8203233536).

b. On October 18, 1982, ACTWU-PAC contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032583602).

27. A running total of the amount contributed to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer by ACTWU-PAC would have put it on notice that as of May 17, 1982, it had contributed \$5,000.00 (FIVE THOUSAND DOLLARS). In violation of 2 U.S.C. §441a(a)(2)(A), ACTWU-PAC made a \$1,000.00 (ONE THOUSAND DOLLAR) contribution on October 18, 1982, which exceeded the \$5,000.00 (FIVE THOUSAND DOLLAR) ceiling by \$1,000.00 (ONE THOUSAND DOLLARS).

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**VII. VIOLATIONS OF THE F.E.C.A.
BY
ILGWUCC
IN THE
1982 FEDERAL GENERAL ELECTION**

28. 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 ILGWUCC for the 1982 federal general election contributed to candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer a total of \$6,000.00 (SIX THOUSAND DOLLARS).

29. ILGWUCC contributed the following amounts:

a. On August 16, 1982, ILGWUCC contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032435073).

b. On August 27, 1982, ILGWUCC contributed \$4,000.00 (FOUR THOUSAND DOLLARS). (See F.E.C. Microfilm # 82033435081).

c. On October 6, 1982, ILGWUCC contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032500143).

30. A running total of the amount contributed to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer by ILGWUCC would have put it on notice that as of August 27, 1982, it had contributed \$5,000.00 (FIVE THOUSAND DOLLARS). In violation of 2 U.S.C. §441a(a)(2)(A), ILGWUCC made a \$1,000.00 (ONE THOUSAND DOLLAR)

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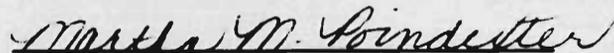
contribution on October 6, 1982, which exceeded the \$5,000.00 (FIVE THOUSAND DOLLAR) ceiling by \$1,000.00 (ONE THOUSAND DOLLARS).

IX. CONCLUSION

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

32. 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

June 1, 1984

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DESIGNATION OF COUNSEL

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

May 21, 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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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, Edmund G. Brown, Jr.; Brown for U.S. Senate; American Federation of Teachers, Committee on Political Education ("AFT-COPE") and its affiliated separate segregated fund ("SSF"), Political Action Council of Educators ("PACE"); Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC"); International Ladies Garment Workers Union Campaign Committee ("ILGWUCC") 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) during either the general or the primary election cycles.

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. Edmund G. Brown, Jr.,

1125 W. Sixth Street
Los Angeles, California 90017 and,

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630 Shatto Place
Los Angeles, California 90005.

- b. Burt Pines, individually and in his capacity as treasurer of Brown for U.S. Senate,

1125 W. Sixth Street
Los Angeles, California 90017 and,

630 Shatto Place
Los Angeles, California 90005.

- c. Jules Glazer, individually and in his capacity as treasurer of Brown for U.S. Senate,

1125 W. Sixth Street
Los Angeles, California 90017 and,

630 Shatto Place
Los Angeles, California 90005.

- d. Brown for U.S. Senate,

1125 W. Sixth Street
Los Angeles, California 90017 and,

630 Shatto Place
Los Angeles, California 90005.

- e. Robert G. Porter, individually and in his capacity as treasurer of American Federation of Teachers, Committee on Political Education,
11 Dupont Circle, N.W.
Washington, D.C. 20036.

- f. American Federation of Teachers, Committee on Political Education,
11 Dupont Circle, N.W.
Washington, D.C. 20036.

- g. William Zimmerman, individually and in his capacity as treasurer of Political Action Council of Educators,
2511 W. 3rd Street
Los Angeles, California 90057.

- h. Political Action Council of Educators,
2511 W. 3rd Street
Los Angeles, California 90057.

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- i. George Solomons, individually and in his capacity as treasurer of Amagamated Clothing and Textile Workers Union Political Action Committee, 15 Union Square New York, New York 10003.
 - j. Amagamated Clothing and Textile Workers Union Political Action Committee, 15 Union Square New York, New York 10003.
 - k. Lawrence Dock, individually and in his capacity as treasurer of International Ladies Garment Workers Union Campaign Committee, 1710 Broadway New York, New York 10019.
 - l. International Ladies Garment Workers Union Campaign Committee, 1710 Broadway New York, New York 10019.

III. LIABILITY

3. Liability may be imposed upon the candidate, Edmund G. Brown, Jr.; Brown for U.S. Senate; AFT-COPE and its affiliated SSF, PACE; ACTWU-PAC; and ILGWUCC pursuant to 2 U.S.C. §441a(a) which establishes the \$5,000.00 (FIVE THOUSAND DOLLAR) 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 AFT-COPE and its affiliated SSF, PACE, 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 primary election or an excess of \$5,000.00 (FIVE THOUSAND DOLLARS) for the 1982 federal general in which Edmund G. Brown, Jr. 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 Edmund G. Brown, Jr.; Brown for U.S. Senate; AFT-COPE and its affiliated SSF, PACE; and ACTWU-PAC filed for the 1982 federal primary election; and which Edmund G. Brown, Jr., Brown for U.S. Senate and ILGWUCC filed for the 1982 federal general election.

7. For the 1982 federal primary election, excessive funds were contributed to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer by AFT-COPE and its treasurer; PACE and its treasurer; and ACTWU-PAC and its treasurer. For the 1982 federal general election, excessive funds were contributed to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer by ILGWUCC and its treasurer.

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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
BROWN FOR U.S. SENATE IN THE
1982 FEDERAL PRIMARY AND GENERAL ELECTIONS**

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, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal primary election from AFT-COPE and its affiliated SSF, PACE, in the amount of \$11,425.00 (ELEVEN THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLARS).

10. Candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, for the 1982 federal primary election, accepted contributions from AFT-COPE and its affiliated SSF, PACE, in the following amounts:

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<u>Date Received</u>	<u>Amount</u>	<u>Contributor</u>	<u>F.E.C. Microfilm Location</u>
7/14/81	\$1,000.00	PACE	82020032018
4/15/82	\$1,000.00	PACE	82020071976
6/5/82	\$5,000.00	AFT-COPE	82020103644
8/18/82	<u>\$4,425.00</u>	AFT-COPE	82020154239
Total	\$11,425.00		

11. A running total of the amount of contributions received from AFT-COPE and its affiliated SSF, PACE, would have put on notice Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer that they had received \$2,000.00 (TWO THOUSAND DOLLARS) on April 15, 1982. On that date, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer were only permitted to accept an additional contribution of \$3,000.00 (THREE THOUSAND 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.

12. PACE and its treasurer failed to designate whether the \$1,000.00 (ONE THOUSAND DOLLAR) contribution made on April 5, 1982 was intended for the primary or the general election. (See F.E.C. Microfilm # 82032421201). However, the contribution was made more than two months before the California Congressional primary election which was held on June 8, 1982. Therefore, the contribution is considered a contribution for the primary election in accordance with 11 C.F.R. §110.1(a)(2)(ii)(A).

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In violation of 11 C.F.R. §104.14(d), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer failed to designate whether the contribution was for the primary or the general election. (See F.E.C. Microfilm # 8200071976). 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 or statement contained therein."

13. Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer failed to accurately report the \$4,425.00 (FOUR THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLAR) contribution of May 26, 1982 which was designated by AFT-COPE as a contribution for the primary election. (See F.E.C. Microfilm # 82032404238). In violation of 11 C.F.R. §104.14(d), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer reported it as a contribution for the general election. (See F.E.C. Microfilm # 82020154239). 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 or statement contained therein." Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer knowingly misreported the contribution in order to accept contributions in excess of the statutory limit.

14. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable

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amendments, which Respondents filed with the Federal Election Commission, Complainant believes that candidate for public office, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal primary election from ACTWU-PAC in the amount of \$6,000.00 (SIX THOUSAND DOLLARS).

15. Candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, for the 1982 federal primary election, accepted contributions from ACTWU-PAC in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>F.E.C. Microfilm Location</u>
5/27/82	\$5,000.00	82020103644
11/4/82	<u>\$1,000.00</u>	82020191641
Total	\$6,000.00	

16. A running total of contributions from ACTWU-PAC would have put on notice Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer that they had received \$5,000.00 (FIVE THOUSAND DOLLARS) on May 27, 1982. On that date, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer could no longer lawfully accept any contributions from ACTWU-PAC. In violation of 2 U.S.C. §441a(f), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer accepted a contribution from this contributor in the amount of \$1,000.00 (ONE THOUSAND DOLLARS). This amount

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exceeded the statutory monetary ceiling by \$1,000.00 (ONE THOUSAND DOLLARS).

17. Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer failed to accurately report the \$1,000.00 (ONE THOUSAND DOLLAR) contribution of October 18, 1982 which was designated by ACTWU-PAC as a contribution for the primary election. (See F.E.C. Microfilm # 82032583602). In violation of 11 C.F.R. §104.14(d), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer reported it as a contribution for the general election. (See F.E.C. Microfilm # 82020191641). 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 or statement contained therein." Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer knowingly misreported the contribution in order to accept contributions in excess of the statutory limit.

18. 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, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, in violation of 2 U.S.C. §441a(f), knowingly accepted contributions for the 1982 federal general election from ILGWUCC in the amount of \$6,000.00 (SIX THOUSAND DOLLARS).

19. Candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer, for the 1982 federal general election, accepted contributions from ILGWUC in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>F.E.C. Microfilm Location</u>
9/29/82	\$4,000.00	82020154242
10/8/82	\$1,000.00	82020154504
10/8/82	<u>\$1,000.00</u>	82020154504
Total	\$6,000.00	

20. A running total of contributions from ILGWUC would have put on notice Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer that they had received \$4,000.00 (FOUR THOUSAND DOLLARS) on September 29, 1982. On that date, Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer were only permitted to accept an additional contribution of \$1,000.00 (ONE THOUSAND DOLLARS). In violation of 2 U.S.C. §441a(f), Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer accepted two contributions from this contributor in the amounts of \$1,000.00 (ONE THOUSAND DOLLARS). This amount exceeded the statutory monetary ceiling by \$1,000.00 (ONE THOUSAND DOLLARS).

**VI. VIOLATIONS OF THE F.E.C.A. BY
APT-COPE AND PACE IN THE
1982 FEDERAL PRIMARY ELECTION**

21. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable

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amendments, which Respondents filed with the Federal Election Commission, the Complainant believes that AFT-COPE and its affiliated SSF, PACE, for the 1982 federal primary election contributed to candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer a total of \$11,425.00 (ELEVEN THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLARS).

22. AFT-COPE and PACE contributed the following amounts:

a. On July 2, 1981, PACE contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 81032092497).

b. On April 5, 1982, PACE contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032421201).

c. On May 26, 1982, AFT-COPE contributed \$5,000.00 (FIVE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032361583).

d. On May 26, 1982, AFT-COPE contributed \$4,425.00 (FOUR THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLARS). (See F.E.C. Microfilm # 82032404238).

23. A running total of contributions made to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer would have put on notice AFT-COPE and its affiliated SSF, PACE, that as of April 5, 1982, they had contributed \$2,000.00 (TWO THOUSAND DOLLARS) and that they could only contribute an additional \$3,000.00 (THREE THOUSAND DOLLARS) if they 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 DOLLAR) contribution and a \$4,425.00 (FOUR THOUSAND

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FOUR HUNDRED TWENTY-FIVE DOLLAR) contribution was made to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer. This amount exceeded the statutory monetary ceiling by \$6,425.00 (SIX THOUSAND FOUR HUNDRED TWENTY-FIVE DOLLARS).

24. PACE and its treasurer failed to accurately report the \$1,000.00 (ONE THOUSAND DOLLAR) contribution of July 2, 1981 and the \$1,000.00 (ONE THOUSAND DOLLAR) contribution of April 5, 1982. In violation of 11 C.F.R. §104.14(d), PACE and its treasurer failed to designate whether the contributions were intended for the primary or the general election. (See F.E.C. Microfilm #s 81032092497 and 82032421201). Since the contributions were made before the California Congressional primary election which was held on June 8, 1982, they are considered contributions for the primary election in accordance with 11 C.F.R. §110.1(a)(2)(ii)(A). 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 or statement contained therein."

**VII. VIOLATIONS OF THE F.E.C.A. BY
ACTWU-PAC IN THE
1982 FEDERAL PRIMARY ELECTION**

25. 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

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Commission, the Complainant believes that ACTWU-PAC for the 1982 federal primary election contributed to candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer a total of \$6,000.00 (SIX THOUSAND DOLLARS).

26. ACTWU-PAC contributed the following amounts:

a. On May 17, 1982, ACTWU-PAC contributed \$5,000.00 (FIVE THOUSAND DOLLARS). (See F.E.C. Microfilm # 8203233536).

b. On October 18, 1982, ACTWU-PAC contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032583602).

27. A running total of the amount contributed to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer by ACTWU-PAC would have put it on notice that as of May 17, 1982, it had contributed \$5,000.00 (FIVE THOUSAND DOLLARS). In violation of 2 U.S.C. §441a(a)(2)(A), ACTWU-PAC made a \$1,000.00 (ONE THOUSAND DOLLAR) contribution on October 18, 1982, which exceeded the \$5,000.00 (FIVE THOUSAND DOLLAR) ceiling by \$1,000.00 (ONE THOUSAND DOLLARS).

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**VII. VIOLATIONS OF THE F.E.C.A.
BY
ILGWUCC
IN THE
1982 FEDERAL GENERAL ELECTION**

28. 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 ILGWUCC for the 1982 federal general election contributed to candidate Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer a total of \$6,000.00 (SIX THOUSAND DOLLARS).

29. ILGWUCC contributed the following amounts:

a. On August 16, 1982, ILGWUCC contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032435073).

b. On August 27, 1982, ILGWUCC contributed \$4,000.00 (FOUR THOUSAND DOLLARS). (See F.E.C. Microfilm # 82033435081).

c. On October 6, 1982, ILGWUCC contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm # 82032500143).

30. A running total of the amount contributed to Edmund G. Brown, Jr., Brown for U.S. Senate and its treasurer by ILGWUCC would have put it on notice that as of August 27, 1982, it had contributed \$5,000.00 (FIVE THOUSAND DOLLARS). In violation of 2 U.S.C. §441a(a)(2)(A), ILGWUCC made a \$1,000.00 (ONE THOUSAND DOLLAR)

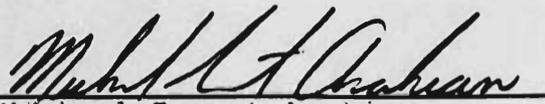
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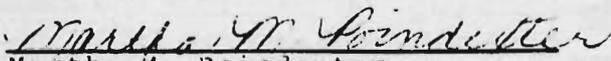
contribution on October 6, 1982, which exceeded the \$5,000.00 (FIVE THOUSAND DOLLAR) ceiling by \$1,000.00 (ONE THOUSAND DOLLARS).

IX. CONCLUSION

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

32. 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.


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Attorneys for Complainant

June 1, 1984

86040583903

DESIGNATION OF COUNSEL

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

May 21 1984
Date

James Edward Antosh
Complainant

DESIGNATED COUNSEL

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Martha M. Poindexter
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