



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 2122

Date Filmed 8/26/86 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 5, 1986

William C. Oldaker, Esquire
Epstein, Becker, Borsody and Green, P.C.
1140 19th Street, N.W., Suite 900
Washington, D. C. 20036

RE: MUR 2122
Simon for Senate
Committee
Edward T. Joyce, as
treasurer

Dear Mr. Oldaker:

On May 20, 1986, the Commission took the following action:

1. Found reason to believe but took no further action against your clients for violations of 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.14(d) in connection with contributions received from the following:

- a) Ironworkers Political Action League and its affiliate, the Ironworkers Local Union 103 Political Action League;
- b) National Rural Letter Carriers Association Political Action Committee;
- c) United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry-Political Education Committee and the Plumbers and Pipefitters Local Union 25 Political Action Committee.

2. Found no reason to believe that your clients violated 2 U.S.C. § 441a(f) or 11 C.F.R. § 104.14(d) in connection with receipt of contributions from the Amalgamated Transit Union-COPE during 1984. The Commission has closed the file in this matter.

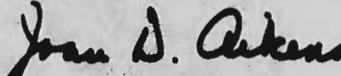
The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

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Letter to William C. Oldaker
Page 2

If you have any questions, please contact Frances B. Hagan,
the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Joan D. Aikens
Chairman

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 5, 1986

Frank Newham, Treasurer
National Rural Letter Carriers Association
Political Action Committee
1448 Duke Street, Suite 100
Alexandria, VA 22314

RE: MUR 2122
National Rural Letter
Carriers Association
Political Action
Committee
Frank Newham, as
treasurer

Dear Mr. Newham:

On May 20, 1986, the Commission found reason to believe and took no further action against the National Rural Letter Carriers' Association Political Action Committee (NRLCAPAC) and you, as treasurer, for violations of 2 U.S.C. § 441a(a)(2)(A) and 11 C.F.R. § 104.14(d) in connection with contributions to the Simon for Senate Committee during 1984. The Commission has closed the file in this matter.

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

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens
Chairman

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 5, 1986

Robert A. Molofsky
5025 Wisconsin Avenue, N.W.
Washington, D. C. 20016

RE: MUR 2122
Amalgamated Transit
Union-COPE
Raymond C. Wallace, as
treasurer

Dear Mr. Molofsky:

On January 31, 1986, the Commission notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on May 20, 1986, determined that on the basis of the information in the complaint, and information provided by you there is no reason to believe that a violation of 2 U.S.C. § 441a(a)(2)(A) has been committed by your clients. The Commission did find reason to believe and took no further action against your clients for a violation of 11 C.F.R. § 104.14(d) for incorrectly reporting the election designation of a contribution of \$500 to the Simon for Senate Committee during 1984.

Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens

Joan D. Aikens, Chairman

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 5, 1986

James E. Cole, Treasurer
Ironworkers Political Action League
1750 New York Avenue, N.W.
Washington, D.C. 20006

RE: MUR 2122
Ironworkers Political
Action League
James E. Cole, as
treasurer

Dear Mr. Cole:

On May 20, 1986, the Commission found reason to believe and took no further action against the Ironworkers Political Action League and you, as treasurer, for violations of 2 U.S.C. § 441a(a)(2)(A) and 11 C.F.R. § 104.14(d) in connection with contributions to the Simon for Senate Committee during 1984. The file has been closed in this matter. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter. at (202) 376-8200.

Sincerely,

Joan D. Aikens, Chairman

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 5, 1986

Robert Matisoff, Esquire
O'Donoghue and O'Donoghue
4748 Wisconsin Avenue, N.W.
Washington, D.C. 20016

RE: MUR 2122
UAPEC
Joseph Cribben, as treasurer
Plumbers and Pipefitters
Local Union 25 PAC
Jerome D. O'Leary, as
treasurer

Dear Mr. Matisoff:

On May 20, 1986, the Commission found reason to believe and took no further action against your clients for violations of 2 U.S.C. § 441a(a)(2)(A) and 11 C.F.R. § 104.14(d) in connection with contributions to the Simon for Senate Committee during 1984. The Commission has closed the file in this matter.

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

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens
Chairman

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 5, 1986

James L. Mahoney, Treasurer
Ironworkers Local 103 Political
Action League
5313 Old Boonville Highway
Evansville, Indiana 47715

RE: MUR 2122
Ironworkers Local 103
Political Action League
James L. Mahoney, as
treasurer

Dear Mr. Mahoney:

On May 20, 1986, the Commission found reason to believe and took no further action against the Ironworkers Local 103 Political Action League and you, as treasurer, for violations of 2 U.S.C. § 441a(a)(2)(A) and 11 C.F.R. § 104.14(d) in connection with contributions to the Simon for Senate Committee during 1984. The Commission has closed the file in this matter.

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

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens
Joan D. Aikens
Chairman

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Paul Simon)
 Simon for Senate Committee and)
 Edward T. Joyce, as treasurer)
 Amalgamated Transit Union-COPE and)
 Raymond C. Wallace, as treasurer)
 Ironworkers Political Action League)
 James E. Cole, as treasurer)
 Ironworkers Local 103 Political Action)
 League and James Mahoney, as treasurer)
 United Association of Journeymen and)
 Apprentices of the Plumbing and)
 Pipefitting Industry - Political)
 Education Committee and Joseph Cribben,)
 as treasurer)
 Plumbers and Pipefitters Local Union #25)
 Political Action Committee and)
 Jerome D. O'Leary, as treasurer)
 National Rural Letter Carriers)
 Association Political Action Committee)
 and Frank Newham, as treasurer.)

MUR 2122

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CERTIFICATION

I, Mary W. Dove, recording secretary for the Federal Election Commission executive session of May 20, 1986, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2122:

1. Find no reason to believe that the Amalgamated Transit Union-Committee on Political Education and Raymond C. Wallace, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A) in connection with contributions made to the Simon for Senate Committee in 1984.
2. Find reason to believe and take no further action against the Amalgamated Transit Union - Committee on Political Education and Raymond C. Wallace, as treasurer, for a violation of 11 C.F.R. § 104.14(d).
3. Find no reason to believe that the Simon for Senate Committee and Edward T. Joyce, as treasurer, violated the following in connection with contributions received from the Amalgamated Transit Union-COPE:
 - a) 2 U.S.C. § 441a(f);
 - b) 11 C.F.R. § 104.14(d).

4. Find reason to believe, take no further action, and close the file with regard to the Ironworkers Political Action League and James E. Cole, as treasurer, and the Ironworkers Local Union 103 Political Action League and James Mahoney, as treasurer, for the following violations in connection with contributions made to the Simon for Senate Committee in 1984:
 - a) 2 U.S.C. § 441a(a)(2)(A);
 - b) 11 C.F.R. § 104.14(d).

5. Find reason to believe, take no further action, and close the file with regard to the Simon for Senate Committee and Edward T. Joyce, as treasurer, for the following violations in connection with contributions received from the Ironworkers Political Action League and its affiliate, the Ironworkers Local Union 103 Political Action League:
 - a) 2 U.S.C. § 441a(f);
 - b) 11 C.F.R. § 104.14(d).

6. Find reason to believe, take no further action, and close the file with regard to the National Rural Letter Carriers' Association Political Action Committee and Frank Newham, as treasurer, for the following violations in connection with contributions made to the Simon for Senate Committee in 1984:
 - a) 2 U.S.C. § 441a(a)(2)(A);
 - b) 11 C.F.R. § 104.14(d).

7. Find reason to believe and take no further action against the Simon for Senate Committee and Edward T. Joyce, as treasurer, for the following in connections with contributions received from the National Rural Letter Carriers Association Political Action Committee:
 - a) 2 U.S.C. § 441a(f);
 - b) 11 C.F.R. § 104.14(d).

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8. Find reason to believe, take no further action, and close the file with regard to the United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry of the United States and Canada, AFL-CIO-Political Education Committee and Joseph Cribben, as treasurer, and the Plumbers and Pipefitters Local Union 25 Political Action Committee and Jerome D. O'Leary, as treasurer, for the following violations in connection with contributions to the Simon Senate Committee in 1984:

- a) 2 U.S.C. § 441a(a)(2)(A);
- b) 11 C.F.R. § 104.14(d).

9. Find reason to believe, take no further action, and close the file with regard to the Simon for Senate Committee and Edward T. Joyce, as treasurer, for violations of 2 U.S.C. § 441a(f) in connection with contributions received from the United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry-Political Education Committee and its affiliate, the Plumbers and Pipefitters Local Union 25 Political Action Committee.
10. Find reason to believe and take no further action against the Simon for Senate Committee and Edward T. Joyce, as treasurer, for a violation of 11 C.F.R. § 104.14(d) in connection with contributions received from the UAPEC and its affiliated Local Union 25 PAC.
11. Close the file as it pertains to the Amalgamated Transit Union-COPE and Raymond C. Wallace, as treasurer.

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12. Approve the appropriate letters.

Commissioners Elliott, Harris, Josefiak, McDonald; and McGarry voted affirmatively for this decision. Commissioner Aikens was not present.

Attest:

5-21-86
Date

Mary W. Dove
Mary W. Dove
Administrative Assistant

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FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D. C. 20463

SENSITIVE

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FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION

MUR: 2122
DATE COMPLAINT RECEIVED
BY OGC _____
DATE OF NOTIFICATION TO
RESPONDENT _____
STAFF: Frances B. Hagan

COMPLAINANT'S NAME:

Jeffrey W. Ryan

RESPONDENTS' NAMES:

Paul Simon
Simon for Senate Committee and
Edward T. Joyce, as treasurer
Amalgamated Transit Union-COPE and
Raymond C. Wallace, as treasurer
Ironworkers Political Action League
James E. Cole, as treasurer
Ironworkers Local 103 Political Action
League and James Mahoney, as treasurer
United Association of Journeymen and
Apprentices of the Plumbing and
Pipefitting Industry - Political
Education Committee and Joseph Cribben,
as treasurer
Plumbers and Pipefitters Local Union #25
Political Action Committee and
Jerome D. O'Leary, as treasurer
National Rural Letter Carriers'
Association Political Action Committee
and Frank Newham, as treasurer.

STATUTES AND REGULATIONS:

- 2 U.S.C. § 441a(a) (2) (A)
- 2 U.S.C. § 441a(f)
- 2 U.S.C. § 441a(a) (5)
- 11 C.F.R. § 103.3(b)
- 11 C.F.R. § 104.14(d)
- 11 C.F.R. § 102.9(e)
- 11 C.F.R. § 110.1(a)
- 11 C.F.R. § 100.5(g) (2) (i) (B)

INTERNAL REPORTS CHECKED:

Disclosure Reports

FEDERAL AGENCIES CHECKED:

None

SUMMARY OF ALLEGATIONS

Complainant alleges that Paul Simon, Simon for Senate ("the Simon Committee") and its treasurer, Edward T. Joyce,

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violated 2 U.S.C. § 441a(f) by knowingly accepting contributions in excess of limitations at 2 U.S.C. § 441a(a)(2)(A) from four union PACs during the 1984 primary and general elections.

Complainant also alleges a violation of 11 C.F.R. § 103.3(b) which provides for treatment of contributions which appear to be illegal. Complainant alleges violations of 11 C.F.R.

§ 104.14(d) for the Simon Committee treasurer's failure to report the same election designations as reported by the contributors.

Complainant alleges that the following union Political Action Committees and their treasurers violated 2 U.S.C. § 441a(a)(2)(A) by making excessive contributions to the Simon Committee during the 1984 primary and/or general elections:

- a) Amalgamated Transit Union - COPE and treasurer
- b) Ironworkers Political Action League, its affiliated Ironworkers Local 103 Political Action League and treasurers
- c) National Rural Letter Carriers' Association PAC and treasurer
- d) United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry - Political Education Committee, its affiliated Plumbers and Pipefitters Local Union 25 and their treasurers.

Complainant states generally that liability may be imposed on the treasurers in this complaint pursuant to 11 C.F.R. § 104.14(d), but does not specifically allege a disclosure violation regarding the PAC treasurers as he did regarding the Simon Committee treasurer.

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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 committee with respect to any federal election which in the aggregate, exceed \$5,000.

2 U.S.C. § 441a(f) prohibits receipt of contributions violative of this section.

11 C.F.R. § 110.1(a)(2)(i) makes it clear that contributions designated in writing by a contributor for a particular election are attributable to the limit set for that election. The regulation further states that a contribution made after a primary election and designated for the primary shall be made only to the extent of the net primary debt. In the case of a contribution not designated in writing for a particular election, the contribution will be attributable for the primary election if made on or before the primary date, and the contribution will be attributable to the general election if made after the primary election date.

The Commission has endorsed the view that based on the regulation at 11 C.F.R. § 110.1(a), the contributor's election designation must be in writing if it alters the function of the regulatory presumption. Furthermore, the written designation will be effective if it is contemporaneously communicated to the recipient. Absent such written communication, the recipient must rely on the date of the contribution to determine the particular election designation as set forth in 11 C.F.R. § 110.1(a).

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11 C.F. R. § 103.3(b)(1) and (2) states in part that contributions which appear to be illegal shall be, within 10 days, either returned to the contributor or deposited into the campaign depository and reported. If deposited ... the treasurer shall make ... best efforts to determine the legality of the contribution. When a contribution cannot be determined to be legal, refunds shall be made within a reasonable time.

This regulation provides a method whereby a committee's diligent attention to receipts and prompt efforts to determine their legality can minimize instances of inadvertent acceptance of illegal contributions (such as those prohibited by the Act at §§ 441a and 441b).

A committee's failure to follow 11 C.F.R. § 103.3(b) and promptly to refund illegal receipts may result in a violation of the Act, but we would not recommend that the Commission find reason to believe that a violation of 11 C.F.R. § 103.3(b) also occurred. That regulation was designed to provide a mechanism whereby recipient committees could avoid a violation of the Act, but no separate violation of 11 C.F.R. § 103.3(b) results from a committee's failure to take advantage of the regulatory provisions for prevention of statutory violations. Therefore, in this Matter Under Review, our recommendations concentrate on violations of the Act and other regulations.

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Amalgamated Transit Union - Committee on Political Education

Our review of reports filed by the Simon Committee and by the Amalgamated Transit Union-Committee on Political Education ("ATU-COPE") reveals the following contributions:

<u>CONTRIBUTOR</u>	<u>CONTRIBUTION AMOUNT</u>	<u>DATE OF CONTRIBUTION</u>	<u>DESIGNATION REPORTED BY CONTRIBUTOR</u>	<u>DATE OF SIMON RECEIPT</u>	<u>DESIGNATION REPORTED BY RECIPIENT</u>
ATU-COPE	\$ 500	3-14-84	G	3-19-84	P
	2,000	4-05-84	G	5-17-84	G
	250	6-25-84	G	8-30-84	G
	2,500	9-05-84	G	9-13-85	G

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Illinois Primary Date: March 20, 1984

Complainant alleged that ATU-COPE contributed \$250 in excess of limitations at 2 U.S.C. § 441a(a)(2)(A) for the general election to the Simon Committee, and that the Simon Committee received the excessive contribution in violation of 2 U.S.C. § 441a(f). Complainant also generally stated that violations of 11 C.F.R. § 103.3(b) occurred for failure to refund excessives. Complainant alleged that the Simon Committee and its treasurer violated 11 C.F.R. § 104.14(d) by reporting the initial \$500 contribution for the primary rather than for the general election as reported by ATU-COPE.

In response to the complaint, ATU-COPE stated that its standard form letter transmitting contributions does not contain an election designation. ATU-COPE submitted a sample copy of the transmittal letter.

ATU-COPE stated that the \$500 contribution dated March 14, 1984 was made before the primary election and was incorrectly reported as a contribution to the general election. On January 16, 1986, respondents amended their reports to reflect a primary election contribution. ATU-COPE further stated that:

"as the ATU-COPE cover letter and check did not designate the specific election for which the contribution was being forwarded, the provisions of 11 C.F.R. § 110.1(a)(2)(ii)(A)...govern..."

According to the Simon Committee reports, the pre-primary contribution of \$500 was received before the primary and labeled as a contribution for the primary election. The Simon Committee's response to the complaint stated that the contributions were accepted for the primary or general election as Simon reported.

Because ATU-COPE did not contemporaneously make a written designation for the \$500 contribution of March 14, 1984, the presumption of the regulation at 11 C.F.R. § 110.1(a) prevails and the pre-primary contribution is attributable to the primary election. Therefore, it appears that ATU-COPE's contributions to the Simon Committee totaled \$500 for the 1984 primary and \$4,750 for the general election. As a result, no violations of 2 U.S.C. §§ 441a(a)(2)(A) or 441a(f) occurred in this matter. We are recommending no reason to believe as to these allegations. However, because ATU-COPE misreported the subject designation, we recommend reason to believe, but no further action against ATU-COPE and its treasurer for a violation of 11 C.F.R. § 104.14(d)

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and no reason to believe that the Simon Committee and its treasurer violated 11 C.F.R. § 104.14(d).

Ironworkers Political Action League and Ironworkers Local Union 103 Political Action League

Our review of the Simon Committee's reports and of reports filed by the Ironworkers Political Action League ("the Ironworkers PAL") and its affiliate the Ironworkers Local 103 Political Action League (the "Local 103") reveal the following contributions:

8 5 0 4 0 5 1 0 4 7 0

<u>CONTRIBUTOR</u>	<u>CONTRIBUTION AMOUNT</u>	<u>DATE OF CONTRIBUTION</u>	<u>DESIGNATION REPORTED BY CONTRIBUTOR</u>	<u>DATE OF SIMON RECEIPT</u>	<u>DESIGNATION REPORTED BY RECIPIENT</u>
Local 103	\$ 200	3-07-84	P	3-16-84	P
	250	5-02-84	P	6-06-84	G
	100	5-17-84	P	6-22-84	G
Ironworkers	1,000	6-01-84	G	7-11-84	P/G
PAL	1,000	6-20-84	G	8-13-84	P/G
	1,000	?	?	8-18-84	P/G
	2,000	9-18-84	G	9-27-84	P/G
	4,800	10-09-84	P debt	10-17-84	P

The Simon Committee reported a general election refund of \$350 to Local 103 on 10-10-84. Local 103 reported the receipt on 12-11-84.

Illinois Primary: March 20, 1984

Complainant alleged that the Ironworkers PAL and its affiliated Local 103 contributed \$350 in excess of limitations at 2 U.S.C. § 441a(a)(2)(A) for the primary election to the Simon Committee, which in turn violated 2 U.S.C. § 441a(f) through receipt of the excessives. Complainant alleged violations of 11 C.F.R. § 103.3(b) which requires prompt refunds of excessives. Complainant also alleged that the Simon Committee and its

treasurer violated 11 C.F.R. § 104.14(d) by reporting the contribution of \$250 and \$100 for the general election rather than for the primary election as reported by Local 103.

In response to the complaint, the Ironworkers PAL and the Local 103 each stated that their combined contributions to the Simon Committee's primary election totaled \$5,350, \$350 of which was refunded. The Simon Committee reported both the receipt and the refund of these funds (\$350) as a general election designation.

In addition, the Ironworkers PAL reported aggregate contributions of \$5,000 designated for the Simon Committee's general election campaign. The Simon Committee reported these receipts as designated for both the primary and general elections.

With regard to the contributor, because there are no written communications which alter the presumptions of the regulation at 11 C.F.R. § 110.1(a), this Office must rely on the dates of the contributions to attribute the contributions to the primary or the general election. Because the Ironworkers PAL and the Local 103 contributed \$200 before the primary and \$10,150 after the primary, the Respondents apparently contributed in excess of limitations to the general election in violation of 2 U.S.C. § 441a(a)(2)(A).

The Simon Committee's response to the complaint stated that it accepted and used all contributions for the election as Simon reported, except that the four contributions designated for

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both the primary and general elections were reported in one entry and actually were accepted for the general election.^{1/}

The Office of General Counsel maintains the position that the recipient committee cannot, without contemporaneous, written designations from the contributor, treat a contribution received before the primary as a general election contribution or after the primary as a primary contribution. (See 11 C.F.R. § 110.1(a)). Although 11 C.F.R. § 102.9(e) (which requires separate accounting to distinguish between primary and general election contributions received before the primary) refers to "contributions . . . designated by the candidate or his or her authorized committee(s) for use in connection with the general election," this phrase should not be construed as permission for the recipient committee to assign contributions to a particular election. Such independent designation by the recipient committee, in this instance the Simon Committee, could contravene the contributor's intent as well as the rules for designated and undesignated contributions at 11 C.F.R. § 110.1(a)(2).

The Commission has supported the view that despite the confusing language of 11 C.F.R. § 102.9(e), this regulation should not be interpreted to mean that the recipient can determine election designations. However, in application, the Commission has declined to proceed against a recipient committee

^{1/} According to the Simon response, "any mark made by the Committee in the Primary Designation box was simply an inadvertent clerical error which should have been more carefully erased before the pertinent report was filed." It is impossible to determine whether the dual designation was a clerical error. Because the contributions were received post-primary and used in the general election, it appears that the result is a reporting problem.

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which had accepted contributions for the primary or general election in a manner that ensured compliance with 2 U.S.C. § 441a. In MUR 1648 (the Riegle case), MUR 1696 (the Sarbanes Committee) and in MUR 1637 (the Kennedy Committee), the Commission found reason to believe and subsequently, based on 11 C.F.R. § 102.9(e), closed the file rather than find probable cause against the recipient candidate committees.

The Office of General Counsel reaffirms its position regarding the intent of the regulation at 11 C.F.R. § 102.9(e). However, based on the Commission's actions in the similar cases noted above, we are recommending that the Simon Committee's "designation" of funds to the primary or general elections be allowed as stated in the Simon response to the complaint. As it happens, in this case such recipient allocation affects the amount of the violation and the decision to pursue rather than to take no further action, because even allowing for the Simon allocations, the Simon Committee received excessive funds for the general election.

The Simon Committee stated that it accepted contributions totaling \$10,350, representing \$5000 for the primary and \$5,350 for the general election, \$350 of which was refunded. According to the Simon Committee and its reports, the general election limitations were exceeded on 9-27-84. The refund of \$350 was

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made on 10-10-84. As a result, by accepting the excessive contribution and failing to refund the illegal receipt within 10 days (11 C.F.R. § 103.3(b)), the Simon Committee violated 2 U.S.C. § 441a(f).

The Office of General Counsel is recommending the Commission find reason to believe that violations of 2 U.S.C. §§ 441a(a)(2)(A) and 441a(f) occurred in this matter. Further, because of discrepancies in reporting of election designations, we are recommending reason to believe that the respondents violated 11 C.F.R. § 104.14(d).

National Rural Letter Carriers Association

Political Action Committee

Our review of reports filed by the Simon Committee and by the National Rural Letter Carriers Association Political Action Committee ("NRLCAPAC") reveals the following contributions:

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<u>CONTRIBUTOR</u>	<u>CONTRIBUTION AMOUNT</u>	<u>DATE OF CONTRIBUTION</u>	<u>DESIGNATION REPORTED BY CONTRIBUTOR</u>	<u>DATE OF SIMON RECEIPT</u>	<u>DESIGNATION REPORTED BY RECIPIENT</u>
NRLCAPAC	\$1,000	10-12-83	G	11-23-83	P
	500	03-05-84	G	03-10-84	P
	1,000	06-18-84	P	07-11-84	P/G
	2,500	06-29-84	P	07-01-84	P/G
	2,000	09-07-84	G	09-17-84	P/G
	2,000	10-04-84	G	10-25-84	P/G
	1,000	11-01-84	P debt	11-04-84	P/G

Illinois Primary: March 20, 1984

Complainant alleged that the NRLCAPAC contributed \$1,500 in excess of limitations at 2 U.S.C. § 441a(a)(2)(A) for the general election to the Simon Committee, and that the Simon Committee received the excessive contribution in violation of 2 U.S.C. § 441a(f). Complainant generally stated in the complaint that

violations of 11 C.F.R. § 103.3(b) occurred for failure to refund excessives. Complainant also alleged that the Simon Committee and its treasurer violated 11 C.F.R. § 104.14(d) by reporting election designations for each contribution which are different from those reported by the contributor.

NRLCAPAC's response to the complaint stated that the \$1,000 contribution dated 10-12-83 and the \$500 contribution dated 3-5-84 were intended for the primary rather than the general election as reported. Since these contributions were made and received before the primary, they follow the regulatory presumption regarding election designations (11 C.F.R. § 110.1(a)) and need no documentation to verify the primary election designation. The respondent did provide an internal document which indicates that the pre-primary contribution of \$1,000 was intended for the 1984 primary. With the response, NRLCAPAC enclosed amendments to disclosure reports which reflect primary election designations.^{2/}

The NRLCAPAC made three other contributions after the primary which it reported as primary contributions or for the primary debt. We have no documentation for any of these contributions which would contemporaneously alter the presumption of the regulation at § 110.1(a) or which would communicate election designations to the recipient. Therefore, based on the regulations at 11 C.F.R. § 110.1(a) and on Commission guidelines, and absent specific written communications which alter the

^{2/} It should be noted that with these changes, the public record shows NRLCAPAC designating \$6,000 to the primary and \$4,000 to the general election.

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presumptions of the regulation, this Office must rely on the dates of contributions to attribute the contributions to the primary or general election. Because the NRLCAPAC contributed \$1,500 before the primary and \$8,500 after the primary, the NRLCAPAC and its treasurer apparently contributed in excess of limitations to the general election in violation of 2 U.S.C. § 441a(a)(2)(A). The Office of General Counsel recommends a finding of reason to believe that the violation occurred. We also recommend a finding of reason to believe that the NRLCAPAC and its treasurer violated 11 C.F.R. § 104.14(d) for inaccurate disclosure of election designations.

As for the Simon Committee, its response to the complaint stated that the contributions from NRLCAPAC were accepted as follows:

<u>Amount</u>	<u>Date Received</u>	<u>Election</u>
\$1,000	11-23-83	P
500	03-10-84	P
2,500	07-01-84	P*
1,000	07-11-84	G*
2,000	09-17-84	G*
2,000	10-25-84	G**
1,000	11-04-84	P**

Illinois Primary - 3-20-84

*The Simon Committee stated that these three contributions were reported on the same report in one entry and both the primary and general election boxes were checked to indicate that the entry contained a primary and general election contribution in one entry.

**The Simon Committee also stated that these two contributions were reported in one entry and both the primary and general election boxes were checked.

According to the response, the Simon Committee "acknowledges that it should have been more precise in reporting the election designation of ... these contributions."

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Again, the Office of General Counsel affirms its position regarding the intent of the regulation at 11 C.F.R. § 102.9(e). However, based on the Commission's previous actions in the similar cases discussed herein, we are recommending that the Commission find reason to believe and take no further action against the Simon Committee and its treasurer for receipt of excessive contributions in violation of 2 U.S.C. § 441a(f). In addition, because of discrepancies in reporting election designations, we recommend a finding of reason to believe and no further action that the Simon Committee and its treasurer violated 11 C.F.R. § 104.14(d) by inaccurately reporting election designations.

United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry of the United States and Canada, AFL-CIO-Political Education Committee ("UAPEC") and the Plumbers and Pipefitters Local Union 25 PAC

Our review of reports filed by the Simon Committee, UAPEC and the Plumbers and Pipefitters Local Union 25 PAC ("Local 25 PAC") reveals the following contributions:

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<u>CONTRIBUTOR</u>	<u>CONTRIBUTION AMOUNT</u>	<u>DATE OF CONTRIBUTION</u>	<u>DESIGNATION REPORTED BY CONTRIBUTOR</u>	<u>DATE OF SIMON RECEIPT</u>	<u>DESIGNATION REPORTED BY RECIPIENT</u>
UAPEC	\$1,000	04-09-84	None	04-19-84	P
	\$1,000	04-16-84	None	06-14-84	P
Local 25	100	07-02-84	G	07-23-84	G
UAPEC	5,000	07-03-84	G	08-13-84	G
Simon Committee refunded \$100 (G) to Local 25 PAC on 8-16-84.					
Local 25	100	08-22-84	P debt	10-17-84*	P
	200	09-19-84	P debt	10-17-84*	P
UAPEC	2,800	10-26-84	P**	11-04-84	P

Simon Committee refunded \$100 (P) to Local 25 PAC on 11-26-84.

*Reported as \$300 (P) received 10-17-84.

**No reported designation until February 1986 when reported for the primary. Illinois Primary: March 20, 1984.

Complainant alleged that UAPEC and its affiliate Local 25 PAC contributed \$3,100 in excess of limitations at 2 U.S.C § 441a(a)(2)(A) for the general election, and that the Simon Committee received the excessive contributions in violation of 2 U.S.C. § 441a(f). Complainant generally stated in the complaint that violations of 11 C.F.R. § 103.3(b) occurred for failure to refund excessives. Complainant also alleged that the Simon Committee and its treasurer violated 11 C.F.R. § 104.14(d) by reporting election designations which do not reflect the contributor's designations.

In response to the complaint, UAPEC and Local 25 PAC stated that the \$5000 post-primary contribution from the national UAPEC was made for the general election as alleged. Respondents stated that the post-primary contribution of \$2,800 which was not designated on reports, was in fact contemporaneously designated in writing for the primary election and communicated to the recipient in a letter transmitting the check. We have received a copy of the transmittal letter. Respondents also provided copies of transmittal letters from Local 25 PAC which contemporaneously designated the contributions of \$100 (8-22-84) and \$200 (9-19-84) for the primary debt.

The complainant asserted that these contributions could not be applied to the primary deficit because the Simon Committee had

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no primary debt, despite disclosure reports which indicate primary debts approaching \$300,000. Although it is impossible to discern an accurate net primary debt from a review of reports, the Simon Committee attests to having a primary debt which is still outstanding today.

On April 9 and 16, 1984, UAPEC made contributions of \$1,000 each to the Simon Committee. UAPEC did not report an election designation for these contributions which were made after the primary.^{3/} Absent written contemporaneous documentation which would alter the presumption of the regulation at 11 CFR § 110.1(a), these two post-primary contributions are attributable to the general election.

As a result of this analysis, it appears that UAPEC and Local 25 PAC made contributions to the Simon Committee totaling \$3,100 to the primary election and \$7,100 to the general election. These respondents received refunds of \$100 for each election. Therefore, UAPEC and Local 25 PAC violated 2 U.S.C. § 441a(a)(2)(A) by making excessive contributions to the Simon Committee's general election campaign. UAPEC and Local 25 PAC violated 11 C.F.R. § 104.14(d) by failing to report certain election designations on reports.

^{3/} It is noted that these initial contributions made after the primary by UAPEC to the Simon Committee were not designated in writing for the primary. However, the letter which transmitted and designated the post primary contribution of \$2,800 (10-26-84) to the primary also referred to these earlier contributions as primary election contributions.

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With regard to the recipient Simon Committee, it accepted \$5,100 for the general election; \$100 was refunded within 10 days pursuant to 11 C.F.R. § 103.3(b). It is the General Counsel's position that because the refund of the excessive contribution was made within the 10 days allotted for refunds by the regulations at 11 C.F.R. § 103.3(b), and because it was reported as required, no excessive contribution occurred insofar as the general election receipts are concerned. However, the Simon Committee accepted \$5,100 from UAPEC and Local 25 PAC for the primary election, exceeding the limits by \$100 on 11-4-84. The refund of \$100 was made on 11-26-84, 22 days after receipt. As a result, the Simon Committee violated 2 U.S.C. § 441a(f) regarding the primary election receipts from UAPEC and Local 25 PAC. We are recommending that the Commission find reason to believe that this violation occurred. Because the Simon Committee reflected the election designations of the two post-primary contributions of \$1,000 as primary contributions, we are recommending reason to believe regarding a violation of 11 C.F.R. § 104.14(d); however, because the Commission has allowed designations by recipient committees (see 11 C.F.R. § 102.9(e)), we also recommend taking no further action concerning 11 C.F.R. § 104.14(d).

Request for Pre-Probable Cause Conciliation

The Simon Committee and the UAPEC stated that should the Commission proceed with findings against them, they would like to settle the issues through pre-probable cause conciliation. Because the investigation is not complete, we recommend that pre-probable cause negotiations be deferred until the respondents

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have an opportunity to answer questions and respond to specific findings.

RECOMMENDATIONS

1. Find no reason to believe that the Amalgamated Transit Union - Committee on Political Education and Raymond C. Wallace, as treasurer, violated 2 U.S.C § 441a(a)(2)(A) in connection with contributions made to the Simon for Senate Committee in 1984.

2. Find reason to believe and take no further action against the Amalgamated Transit Union - Committee on Political Education and Raymond C. Wallace, as treasurer, for a violation of 11 C.F.R. § 104.14(d).

3. Find no reason to believe that the Simon for Senate Committee and Edward T. Joyce, as treasurer, violated the following in connection with contributions received from the Amalgamated Transit Union-COPE:

- a) 2 U.S.C. § 441a(f);
- b) 11 C.F.R. § 104.14(d).

4. Find reason to believe that the Ironworkers Political Action League and James E. Cole, as treasurer, and the Ironworkers Local Union 103 Political Action League and James Mahoney, as treasurer, violated the following in connection with contributions made to the Simon for Senate Committee in 1984:

- a) 2 U.S.C. § 441a(a)(2)(A);
- b) 11 C.F.R. § 104.14(d).

5. Find reason to believe that the Simon for Senate Committee and Edward T. Joyce, as treasurer, violated the following in connection with contributions received from the Ironworkers Political Action League and its affiliate, the Ironworkers Local Union 103 Political Action League:

- a) 2 U.S.C. § 441a(f);
- b) 11 C.F.R. § 104.14(d).

6. Find reason to believe that the National Rural Letter Carriers' Association Political Action Committee and Frank Newham, as treasurer, violated the following in connection with contributions made to the Simon for Senate Committee in 1984:

- a) 2 U.S.C. § 441a(a)(2)(A);
- b) 11 C.F.R. § 104.14(d).

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7. Find reason to believe and take no further action against the Simon for Senate Committee and Edward T. Joyce, as treasurer, for the following in connection with contributions received from the National Rural Letter Carriers Association Political Action Committee:

- a) 2 U.S.C. § 441a(f);
- b) 11 C.F.R. § 104.14(d).

8. Find reason to believe that the United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry of the United States and Canada, AFL-CIO-Political Education Committee and Joseph Cribben, as treasurer, and the Plumbers and Pipefitters Local Union 25 Political Action Committee and Jerome D. O'Leary, as treasurer, violated the following in connection with contributions to the Simon for Senate Committee in 1984:

- a) 2 U.S.C. § 441a(a)(2)(A);
- b) 11 C.F.R. § 104.14(d).

9. Find reason to believe that the Simon for Senate Committee and Edward T. Joyce, as treasurer, violated 2 U.S.C. § 441a(f) in connection with contributions received from the United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry-Political Education Committee and its affiliate, the Plumbers and Pipefitters Local Union 25 Political Action Committee.

10. Find reason to believe and take no further action against the Simon for Senate Committee and Edward T. Joyce, as treasurer, for a violation of 11 C.F.R. § 104.14(d) in connection with contributions received from the UAPEC and its affiliated Local Union 25 PAC.

11. Close the file as it pertains to the Amalgamated Transit Union-COPE and Raymond C. Wallace, as treasurer.

12. Decline at this time to enter into pre-probable cause conciliation negotiations with the Simon for Senate Committee and Edward T. Joyce, as treasurer.

13. Decline at this time to enter into pre-probable cause conciliation negotiations with the United Association of Journeymen and Apprentices of the Plumbing and Pipefitting

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Industry Political Education Committee and Joseph Cribben, as treasurer.

14. Approve attached letters and questions.

Charles N. Steele
General Counsel

May 8, 1986
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

Letters

Responses from ATU-COPE, Ironworkers

PAL and Local 103 PAL, UAPEC, NRLCAPAC, the Simon Committee

86040510493



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

William C. Oldaker, Esquire
Epstein, Becker, Borsody and Green, P.C.
1140 19th Street, N.W., Suite 900
Washington, D. C. 20036

RE: MUR 2122
Simon for Senate
Committee
Edward T. Joyce, as
treasurer

Dear Mr. Oldaker:

The Federal Election Commission notified your clients on January 31, 1986, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time.

Upon further review of the allegations contained in the complaint, the Commission, on , 1986, determined that there is reason to believe that your clients have violated the following in connection with contributions received from the Ironworkers Political Action League and its affiliate, the Ironworkers Local Union 103 Political Action League:

- a) 2 U.S.C. § 441a(f);
- b) 11 C.F.R. § 104.14(d).

The Commission also found reason to believe that your clients violated 2 U.S.C. § 441a(f) in connection with contributions received from the United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry-Political Education Committee and the Plumbers and Pipefitters Local Union 25 Political Action Committee. The Commission found reason to believe, but took no further action against your clients for violating 11 C.F.R. § 104.14(d) in connection with receipts from UAPEC or Local 25 PAC.

Attachment A(1)

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Letter to William C. Oldaker
Page 2

In addition, the Commission found reason to believe, but took no further action against your clients for the following violations in connection with contributions from the National Rural Letter Carriers Association Political Action Committee during 1984:

- a) 2 U.S.C. § 441a(f);
- b) 11 C.F.R. § 104.14(d).

The Commission found no reason to believe that your clients violated 2 U.S.C. § 441a(f), or 11 C.F.R. § 104.14(d) in connection with receipt of contributions from the Amalgamated Transit Union-COPE during 1984.

Specifically, it appears that your clients accepted excessive contributions in violation of 2 U.S.C. § 441a(f) from the entities noted above. Further, it appears that the election designations have been misreported in violation of 11 C.F.R. § 104.14(d).

The Commission also considered your request for pre-probable cause conciliation and determined not to enter into such negotiations at this time as the investigation in this matter is not complete.

Requests for extensions of time to respond to these findings will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens
Chairman

A (2)

86040610485



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert A. Molofsky
5025 Wisconsin Avenue, N.W.
Washington, D. C. 20016

RE: MUR 2122
Amalgamated Transit
Union-COPE
Raymond C. Wallace, as
treasurer

Dear Mr. Molofsky:

On January 31, 1986, the Commission notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on _____, 1986, determined that on the basis of the information in the complaint, and information provided by you there is no reason to believe that a violation of 2 U.S.C. § 441a(a)(2)(A) has been committed by your clients. The Commission did find reason to believe and took no further action against your clients for a violation of 11 C.F.R. § 104.14(d) for incorrectly reporting the election designation of a contribution of \$500 to the Simon for Senate Committee during 1984.

Accordingly, the Commission closed its file in this matter as it pertains to your clients. This matter will become a part of 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.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Attachment B

86040510486



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

James E. Cole, Treasurer
Ironworkers Political Action League
1750 New York Avenue, N.W.
Washington, D.C. 20006

RE: MUR 2122
Ironworkers Political
Action League
James E. Cole, as
treasurer

Dear Mr. Cole:

The Federal Election Commission notified the Ironworkers Political Action League and you, as treasurer, on January 31, 1986, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on , 1986, determined that there is reason to believe that the Ironworkers Political Action League and you, as treasurer, have violated 2 U.S.C. § 441a(a)(2)(A) and 11 C.F.R. § 104.14(d), provisions of the Act and Regulations.

Specifically, it appears that your committee and its affiliate, the Ironworkers Local 103 Political Action League, made contributions in excess of limitations to the Simon for Senate Committee during 1984, and inaccurately reported election designations for these contributions.

Your response to the Commission's initial notification of this complaint did not provide complete information regarding the matter in question. Please submit answers to the enclosed questions within 10 days of receipt of this letter.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be

Attachment (1)

85040610487

Letter to James E. Cole, Treasurer
Page 2

entertained after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extentions beyond 20 days.

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 have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens
Chairman

Enclosures
Procedures
Questions

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C (2)

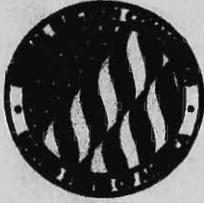
QUESTION

Please provide specific information and documentation concerning the election designation of the following contributions. Such documentation should include any written, contemporaneous documents transmitting the contributions, particularly if the documents communicated to the recipient the intended election designation. See 11 C.F.R. § 110.1(a).

<u>CONTRIBUTOR</u>	<u>CONTRIBUTION AMOUNT</u>	<u>DATE OF CONTRIBUTION</u>	<u>DESIGNATION REPORTED BY CONTRIBUTOR</u>	<u>DATE OF SIMON RECEIPT</u>	<u>DESIGNATION REPORTED BY RECIPIENT</u>
Local 103	\$ 200	3-07-84	P	3-16-84	P
	250	5-02-84	P	6-06-84	G
	100	5-17-84	P	6-22-84	G
Ironworkers	1,000	6-01-84	G	7-11-84	P/G
PAL	1,000	6-20-84	G	8-13-84	P/G
	1,000	?	?	8-18-84	P/G
	2,000	9-18-84	G	9-27-84	P/G
	4,800	10-09-84	P deficit	10-17-84	P

The Simon for Senate Committee refunded \$350 (G) to Local 103 on 10-10-84.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

James L. Mahoney, Treasurer
Ironworkers Local 103 Political
Action League
5313 Old Boonville Highway
Evansville, Indiana 47715

RE: MUR 2122
Ironworkers Local 103
Political Action League
James L. Mahoney, as
treasurer

Dear Mr. Mahoney:

The Federal Election Commission notified the Ironworkers Local 103 Political Action League and you, as treasurer, on January 31, 1986, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on , 1986, determined that there is reason to believe that Local 103 PAL and you, as treasurer, have violated 2 U.S.C. § 441a(a)(2)(A) and 11 C.F.R. § 104.14(d), provisions of the Act and Regulations.

Specifically, it appears that your committee and the affiliated Ironworkers Political Action League made contributions in excess of limitations to the Simon for Senate Committee during 1984.

Your response to the Commission's initial notification of this complaint did not provide complete information regarding the matter in question. Please submit answers to the enclosed questions within 10 days of receipt of this letter.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or

Attachment D (1)

86040610490

Letter to James L. Mahoney
Page 2

recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extentions beyond 20 days.

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 have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens
Chairman

Enclosures
Procedures
Questions

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D (2)

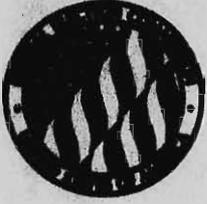
QUESTION

Please provide specific information and documentation concerning the election designation of the following contributions. Such documentation should include any written, contemporaneous documents transmitting the contributions, particularly if the documents communicated to the recipient the intended election designation. See 11 C.F.R. § 110.1(a).

<u>CONTRIBUTOR</u>	<u>CONTRIBUTION AMOUNT</u>	<u>DATE OF CONTRIBUTION</u>	<u>DESIGNATION REPORTED BY CONTRIBUTOR</u>	<u>DATE OF SIMON RECEIPT</u>	<u>DESIGNATION REPORTED BY RECIPIENT</u>
Local 103	\$ 200	3-07-84	P	3-16-84	P
	250	5-02-84	P	6-06-84	G
	100	5-17-84	P	6-22-84	G
Ironworkers	1,000	6-01-84	G	7-11-84	P/G
PAL	1,000	6-20-84	G	8-13-84	P/G
	1,000	?	?	8-18-84	P/G
	2,000	9-18-84	G	9-27-84	P/G
	4,800	10-09-84	P deficit	10-17-84	P

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The Simon for Senate Committee refunded \$350 (G) to Local 103 on 10-10-84.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert Matisoff, Esquire
O'Donoghue and O'Donoghue
4748 Wisconsin Avenue, N.W.
Washington, D.C. 20016

RE: MUR 2122
UAPEC
Joseph Cribben, as treasurer
Plumbers and Pipefitters
Local Union 25 PAC
Jerome D. O'Leary, as
treasurer

Dear Mr. Matisoff:

On January 31, 1986, the Commission notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was forwarded to your clients at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on , 1986, determined that there is reason to believe that your clients have violated 2 U.S.C. § 441a(a)(2)(A) and 11 C.F.R. § 104.14(d), provisions of the Act and Regulations.

Specifically, it appears that your clients made contributions in excess of limitations to the Simon for Senate Committee during 1984, and inaccurately reported election designations for certain of these contributions.

The Commission also considered your request for pre-probable cause conciliation, and determined not to enter into negotiations until such time as the investigation is complete regarding your clients. Your clients' response to the Commission's initial notification of this complaint did not provide complete information regarding the matter in question. Please submit answers to the enclosed questions within 10 days of receipt of this letter.

Attachment E (1)

86040510493

Letter to Robert Matisoff, Esquire
Page 2

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens
Chairman

Enclosures
Procedures
Question

86040610494

E (2)

QUESTION

Please provide specific information and documentation concerning the election designation of the first two contributions below of \$1000 each made April 9 and 16, 1984. Such documentation should include any written, contemporaneous documents transmitting the contributions, particularly if the documents communicated to the recipient the intended election designation. See 11 C.F.R. § 110.1(a).

<u>CONTRIBUTOR</u>	<u>CONTRIBUTION AMOUNT</u>	<u>DATE OF CONTRIBUTION</u>	<u>DESIGNATION REPORTED BY CONTRIBUTOR</u>	<u>DATE OF SIMON RECEIPT</u>	<u>DESIGNATION REPORTED BY RECIPIENT</u>
UAPEC	\$1,000	04-09-84	None	04-19-84	P
	\$1,000	04-16-84	None	06-14-84	P
Local 25	100	07-02-84	G	07-23-84	G
UAPEC	5,000	07-03-84	G	08-13-84	G

Simon Committee refunded \$100(G) to Local 25 PAC on 8-16-84.

Local 25	100	08-22-84	P debt	10-17-84*	P
	200	09-19-84	P debt	10-17-84*	P

UAPEC	2,800	10-26-84	P**	11-04-84	P
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Simon Committee refunded \$100(P) to Local 25 PAC on 11-26-84.

Reported 10-17-84 \$300(P) receipt.

*No reported designation until February 1986 when reported for the primary.

Illinois Primary: March 20, 1984.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Frank Newham, Treasurer
National Rural Letter Carriers Association
Political Action Committee
1448 Duke Street, Suite 100
Alexandria, VA 22314

RE: MUR 2122
National Rural Letter
Carriers Association
Political Action
Committee
Frank Newham, as
treasurer

Dear Mr. Newham:

The Federal Election Commission notified the National Rural Letter Carriers Association Political Action Committee (NRLCAPAC) and you, as treasurer, on January 31, 1986, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on _____, 1986, determined that there is reason to believe that the NRLCAPAC and you, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A) and 11 C.F.R. § 104.14(d), provisions of the Act and Regulations.

Specifically, it appears that your committee made contributions in excess of limitations to the Simon for Senate Committee during 1984 and inaccurately reported such contributions.

Your response to the Commission's initial notification of this complaint did not provide complete information regarding the matter in question. Please submit answers to the enclosed questions within fifteen days of your receipt of this letter.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be

Attachment F(1)

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Letter to Frank Newham
Page 2

pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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 have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens
Chairman

Enclosure
Procedures
Questions

86040510497

F (2)

QUESTIONS

Please provide specific information and documentation concerning the election designations of the following contributions. Such documentation should include any written, contemporaneous documents transmitting the contributions, particularly if the documents communicated to the recipient the intended election designation. See 11 C.F.R. § 110.1(a).

<u>CONTRIBUTOR</u>	<u>CONTRIBUTION AMOUNT</u>	<u>DATE OF CONTRIBUTION</u>	<u>DESIGNATION REPORTED BY CONTRIBUTOR</u>	<u>DATE OF SIMON RECEIPT</u>	<u>DESIGNATION REPORTED BY RECIPIENT</u>
NRLCAPAC	\$1,000	10-12-83	G	11-23-83	P
	500	03-05-84	G	03-10-84	P
	1,000	06-18-84	P	07-11-84	P/G
	2,500	06-29-84	P	07-01-84	P/G
	2,000	09-07-84	G	09-17-84	P/G
	2,000	10-04-84	G	10-25-84	P/G
	1,000	11-01-84	P debt	11-04-84	P/G

86040510498
 Illinois Primary: March 20, 1984

F ③

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-FC
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FEB 14 8:11



AMALGAMATED TRANSIT UNION

5025 WISCONSIN AVE., N.W. WASHINGTON, D.C. 20016 (202) 537-1645

February 13, 1986

Frances B. Hagan, Esq.
General Counsel's Office
Federal Election Commission
1325 K Street, N. W.
Washington, D. C.

Re: FEC MUR 2122

Dear Ms. Hagan:

This letter constitutes the response of the Amalgamated Transit Union-Committee on Political Education (ATU-COPE) and Raymond C. Wallace, individually and in his capacity as Treasurer of ATU-COPE, (herein "respondents") to your letter dated January 31, 1986, stating that the Commission has received a complaint alleging that the respondents may have violated the Federal Election Campaign Act of 1971, as amended ("the Act").

The complaint, FEC MUR 2122, alleges that the respondent political committee and its treasurer violated Sections 441a(a)(2)(A) and 441a(f) of the Act by making contributions to the Simon for Senate Committee for the 1984 federal general election in the amount of \$5,250.00, exceeding the \$5,000.00 per election limitation in the Act by \$250.00.

We submit that respondent's contributions to the Simon for Senate Committee did not exceed the \$5,000.00 contribution per election limitation of the Act. As set forth below, the \$500.00 contribution received by the Committee on March 19, 1984, was incorrectly reported by ATU-COPE to the FEC as a general campaign fund contribution. This filing was subsequently corrected, redesignating the contribution for the primary election as originally intended. The contribution was, however, properly reported by the Simon for Senate Committee as a primary campaign contribution placing our distributions as described herein within the Act's limitations for both the primary and general 1984 elections.

As referenced in the complaint, in 1984, respondents distributed four separate campaign contributions to the Simon for Senate Committee. A \$500.00 contribution was distributed on March 14, 1984, and received by the Committee on March 19, 1984. A second \$2,000.00 contribution was distributed on

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Attachment 5-1



April 5, 1984, and received by the Committee on May 17, 1984. A third contribution for \$250.00 was distributed on June 25, 1984, and received by the Committee on August 30, 1984. Finally, a contribution for \$2,500.00 was distributed on September 5, 1984, and received by the campaign Committee on September 13, 1984. Copies of respondents monthly FEC reports listing these campaign contributions are attached hereto as Exhibits A-D respectively. A copy of the March 14, 1984, check is also attached as Exhibit E. Pursuant to respondents regular operating procedure, each of these campaign contributions was accompanied by a standard ATU-COPE cover letter referencing the enclosed check. Neither the cover letters nor the checks designated the March or subsequent contributions for either the primary or general elections. A copy of the standard ATU-COPE cover letter is attached hereto as Exhibit F. Copies of the actual letter sent with the individual contributions were not kept in our files.

By letter dated January 16, 1986, respondents advised the Federal Election Commission that they inadvertently listed on their Schedule B March 1984 FEC report the \$500.00 March 14, campaign contribution as designated for the general election. They further informed the FEC that the March 1984, contribution was for the then upcoming primary election, held on March 20, 1984. Accompanying the January 16, 1986, letter was a corrected copy of respondents Schedule B FEC report with a request that the Commission's records be amended accordingly. A copy of this January 16, 1986, letter and attachment is enclosed herein as Exhibit G.

As respondents records indicate and as your investigation will establish, although the ATU-COPE's March 14, 1984, Simon for Senate contribution was incorrectly reported as being for the 1984 general election, that contribution was contemporaneously and correctly reported by the Simon for Senate campaign as a primary election contribution. Further, as the ATU-COPE cover letter and check did not designate the specific election for which the contribution was being forwarded, the provisions of 11 C.F.R. Sections 110.1a(2)(ii)(A) and 110.2(a)(1) govern establishing that the March 1984, contribution which preceded the scheduled primary election should be credited for that election and not for the general election.

At no time did respondents herein knowingly or intentionally undertake campaign contributions in excess of the Act's legal limitations.

As a result of filing our amended March 1984, FEC report correctly redesignating our March 1984, campaign contribution for the primary election, as properly recorded by the Simon for Senate Campaign Committee, we submit that respondents herein did not violate the ceiling amounts permitted by Section 441a(a)(2)(A) of the Act.

For the foregoing reasons, respondents respectfully request that the Commission dismiss and close the file on the instant matter involving respondents herein.

Sincerely yours,

Robert A. Molofsky

Robert A. Molofsky
Counsel for Respondents

Raymond C. Wallace
Individually and as
Treasurer of the
Amalgamated Transit
Union Committee on
Political Education;

Amalgamated Transit Union
Committee on Political
Education

cc: Mr. Jim La Sala
International President
Amalgamated Transit Union

Mr. Raymond Wallace
International Secretary-
Treasurer
Amalgamated Transit Union
ATU-COPE Director

86040510501

G ③

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

JEFFREY W. RYAN
4757 Parkman Court
Annandale, Virginia 22003,

Complainant,

v.

PAUL SIMON, SIMON FOR SENATE
COMMITTEE, AMALGAMATED TRANSIT UNION -
COPE, IRONWORKERS POLITICAL ACTION
LEAGUE, NATIONAL RURAL LETTER
ASSOCIATION - PAC, UNITED ASSOCIATION
OF JOURNEYMEN AND APPRENTICES OF THE
PLUMBING AND PIPE FITTING INDUSTRY -
PAC, and PLUMBERS AND PIPEFITTERS
LOCAL UNION #25 POLITICAL ACTION
COMMITTEE AND ALL THE COMMITTEES'
TREASURERS,

Respondents.

MUR 2122

RESPONSE TO COMPLAINT OF UNITED ASSOCIATION OF
JOURNEYMEN AND APPRENTICES OF THE PLUMBING AND
PIPEFITTING INDUSTRY POLITICAL EDUCATION COMMITTEE,
PLUMBERS AND PIPEFITTERS LOCAL UNION 25 POLITICAL
ACTION COMMITTEE AND THEIR TREASURERS

This shall constitute the response to the complaint of
the following respondents:

- (a) United Association of Journeymen and Apprentices
of the Plumbing and Pipefitting Industry of the
United States and Canada, AFL-CIO - Political
Education Committee ("UAPEC");

Attachment H ①

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- (b) the treasurer of the UAPEC, incorrectly identified in the complaint as Joseph Walsh. The treasurer of the UAPEC is Joseph Cribben. (A December 15, 1983 letter to the Commission notifying the Commission of Mr. Walsh's resignation and Mr. Cribben's appointment is attached as Exhibit A.);
- (c) Plumbers and Pipefitters Local Union 25 PAC; and
- (d) the Treasurer of the Local Union 25 PAC, Jerome D. O'Leary;

The position of each of these respondents is that there is no merit whatsoever to the complaint and that it should be dismissed with respect to these respondents.

The claim made against these respondents is that the UAPEC, together with its affiliated committee, the Local Union 25 PAC, contributed in excess of \$5000 to the general election campaign of the Simon for Senate Committee. The complaint correctly alleges that on July 3, 1984 the UAPEC contributed \$5000 designated for the general election. Thereafter, it is alleged, the \$5000 limitation of 2 U.S.C. § 441(a) was exceeded by additional contributions totaling \$3100. As we understand the theory of the complaint, this \$3100 excess of contributions to the general election is composed of the following:

- (a) An October 26, 1984 contribution of \$2800 from the UAPEC. According to the complaint, this contribution was "undesigned"; since it was undesigned and made after the primary election,

the complaint alleges, it must be allocated to the general election, pursuant to 11 C.F.R. § 110.1 (a)(2)(ii)(B).

- (b) An August 22, 1984 contribution of \$100 from the Local Union 25 PAC and a September 19, 1984 contribution of \$200 from the Local Union 25 PAC, both designated to reduce the Simon campaign primary debt, at a time when it is alleged there was no primary debt. Thus, it is argued, these two contributions totaling \$300 must be allocated to the general election, pursuant to 11 C.F.R. § 100.1(a)(2)(i).

Both aspects of this theory are flawed. First of all, contrary to what is alleged in the complaint, the October 26, 1984 contribution of \$2800 was specifically designated in writing at the time it was made for the primary campaign. Attached hereto as Exhibit B is an October 29, 1984 letter from the United Association, the UAPEC's parent organization, transmitting the \$2800 contribution to the Simon campaign, specifically stating that since the \$5000 general election limitation was already met, the \$2800 contribution "can only be applied to your primary campaign expenditures" [emphasis added]. Not only does this letter, Exhibit B, demonstrate that the \$2800 contribution was designated in writing for the primary campaign, but it also reveals a scrupulous, good-faith attempt by the UAPEC to comply with the contribution limitations of federal law.

Nothing in the language of the regulation relied upon by the complainant, 11 C.F.R. § 110.1(a)(2), or in any other regulation, indicates that the October 29, 1984 letter, Exhibit B, is an inadequate form of "designation in writing". The basis for the claim that the \$2800 contribution was undesignated apparently is that on the appropriate report of receipts and expenditures filed by the UAPEC with the Commission, covering the period October 18, 1984 through November 26, 1984, a check mark in the box marked "primary" had been inadvertently omitted in reporting the \$2800 contribution. If anything, the failure to check the "primary" box arguably may be a technical deficiency in reporting. However, this is not the alleged violation set forth in the complaint. Moreover, the failure to check the box does not establish that the contribution itself was not designated in writing for the primary (which Exhibit B shows it clearly was) or give rise to a violation of the contribution limitations.¹

Similarly, there is no merit to the claim that the August 22, 1984 contribution of \$100 and the September 19, 1984 contribution of \$200 from the Local Union 25 PAC must be allocated to the general election. Attached hereto as Exhibits C and D are letters transmitting these contributions to the Simon campaign from Local 25, the parent organization or the Local 25 PAC. Both letters clearly and unequivocally designate the

¹To correct any deficiency in reporting, we hereby enclose, as Exhibit E, a revised and amended page 4 of the UAPEC's Report of Receipts and Disbursements covering the period October 18, 1984 through November 26, 1984, with a check mark in the primary box with regard to the \$2800 contribution for the Simon Campaign.

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contributions in question for "primary debt reduction" or "primary election deficit". The complaint alleges that at the time these contributions were made, there was no primary debt, as reported by the Simon campaign. First of all, it is our understanding that at all relevant times the Simon Campaign has been reporting a primary debt on its reports filed with the Commission. More important, the allegation that there was no primary debt is contrary to what the Local 25 PAC now understands and understood at the time the contributions were made. Indeed, we have been orally informed by the Simon Committee that not only was there a net primary debt at the time these contributions were made, but there still remains a primary debt at this time. If, despite the existence of a primary debt, the Simon campaign erroneously reported that there was no debt on its reporting forms filed with the Commission, that is arguably a reporting deficiency of the Simon campaign itself, but not a violation in any respect by the Local Union 25 PAC. On the other hand, if the information supplied by the Simon campaign to the Local Union 25 PAC about the existence of a primary debt was incorrect, and there was, in fact no such debt in existence at the time of the contribution, the Local Union 25 PAC cannot be faulted for relying in good faith upon the information it was supplied. As noted, the transmittal letters, Exhibits C and D, clearly designate the contributions for relieving the primary debt. The Simon campaign never returned those contributions or advised the Local Union 25 PAC, in response to these letters, that there was

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actually no primary debt. Thus, there is no basis at all for action against the Local Union 25 PAC.

In sum, the particular violations alleged in the complaint have no support in the facts. The \$2800 contribution was specifically designated in writing for the primary campaign; the contributions of \$100 and \$200 were designated for the primary on the understanding that a primary debt existed. Thus, there is no basis for the claim that these contributions must be allocated to the general election and, in turn, no basis for the claim that the \$5000 general election limitation was exceeded. Accordingly, the complaint against the UAPEC and the Local union 25 PAC and their treasurers should be dismissed.

Should the Commission decide to proceed further, notwithstanding this reponse, respondents request that the matter be handled through voluntry, informal conciliation.

Respectfully submitted,

O'DONOGHUE & O'DONOGHUE
4748 Wisconsin Avenue, N.W.
Washington, D.C. 20016
(202) 362-0041

By Robert Matisoff
Robert Matisoff

H (6)

86040610507

International Association
of
Bridge, Structural and Ornamental Iron Workers

GCC 9708
03 FEB 11 11:01

Local No. 103
Affiliated with A.F.L.-C.I.O.
PHONE 477-3317

5313 Old Beeville Highway - Evansville, Indiana 47715

36 FEB 11 11:26

February 6, 1986

Federal Election Commission
Washington D.C. 20463
attn: Frances B Hagan

Dear Ms. Hagan:

In regards to the complaint filed by Jeff W Ryan concerning the over-contribution in behalf of Senator Paul Simon of Illinois involving Iron Workers Local #103 and its International. We wish to have the complaint withdrawn after you have reviewed the following information.

1.) F.E.C. report dated 4-1-84 covering period 1-1-84 through 3-31-84 shows a contribution of \$200.00 to Simon for Senate Committee on 3-7-84 for his primary campaign.

2.) F.E.C. report dated 7-9-84 covering period 4-1-84 through 6-30-84 shows a contribution of \$250.00 on 5-2-84 and the purchase of dinner tickets for \$100.00 on 5-17-84. Both contributions were for Mr Simons primary campaign.

3.) F.E.C. report dated 10-15-84 covering period 7-1-84 through 10-15-84 shows no contributions to Mr Simons committee.

4.) F.E.C. report dated 1-10-85 covering period 10-16-84 through 12-31-84 clearly shows a refund to I.W.Local #103 P.A.L. on 12-11-84 for \$350.00 from the Simon for Senate Committee.

I am also including a copy of these previously filed reports from our Political Action Committee.

Other facts that could be taken into consideration are that in October of 1984 our P.A.L. Committee voted to donate \$1000.00 additional to the Simon for Senate Committee, but were informed by his campaign office that total contributions

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Attachment I (1)

International Association
of
Bridge, Structural and Ornamental Iron Workers

Local No. 103

Affiliated with A.F.L.-C.I.O.
PHONE 477-8317

5313 Old Boonville Highway - Evensville, Indiana 47715

-2-

of \$5000.00 by Affiliated Ironworkers had been exceeded and that we could expect a refund, which was sent in December 1984. Enclosed find copy of letter dated 10-16-84 sent to the International P.A.L. Director Mickey Brennan, which on page 2 states this. There is a mistake in the letter, it should read \$550.00, instead of \$450.00. Either I made a mistake in addition or the secretary hit the wrong key, but it was not intentional.

Also enclosed is copy of Bank Deposit of 12-11-84 showing that the \$350.00 from Simon for Senate Committee was received and deposited.

I hope these facts will be taken into consideration by the members of the Commission and that no action be taken in regards to our participation in the complaint as we think it is in error.

Sincerely yours,

James L. Mahoney

James L Mahoney
Treasurer
Iron Workers Local #103
Political Action League

Please consider the above Facts, Documents, and Statements to be honest and truthful to the best of my knowledge regarding this complaint and sworn to by my signature.

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**POLITICAL
ACTION
COMMITTEE**

Suite 100, 1448 Duke Street

Alexandria, Virginia 22314

Telephone (703) 664-5545



GCC#9824
FEB 25 4:11:52

LESTER F. MILLER, Co-Chairman
CLIFFORD E. EDWARDS, Co-Chairman
FRANK NEWHAM, Secretary-Treasurer

February 20, 1986

10 FEB 25 4:21:22

Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Gross:

RE: MUR 2122

I have received your letter of January 31, 1986 advising us the the FEC had received a complaint that the NRLCA PAC and The Simon for Senate Committee may have violated certain sections of "the Act".

I have checked my records and find that the contribution of \$1,000.00 was reported in error on schedule B as a contribution to the General Election instead of for the Primary Election. This contribution was made on October 12, 1983. Also, a contribution of \$500.00 was made to the Simon for Senate Committee on March 5, 1984 and reported to the FEC for the General Election instead of the Primary Election.

A copy of our disbursement sheet shows a "P" after the 84 which indicates a contribution for the Primary Election and therefore, when the report was typed for filing with the FEC, the error was made. It was our intention that the above contributions be made to the Primary election.

I am enclosing an amended report for the Period Ending December 31, 1983 and Period Ending March 31, 1984.

We appreciate this matter being brought to our attention and acceptance of our amended reports.

Sincerely,

Frank Newham
Frank Newham
Treasurer, NRLCA PAC

FN:fn
enclosures

Attachment K
2-26-86

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Hagan

11005 1987

EPSTEIN BECKER BORSODY & GREEN, P.C.

ATTORNEYS AT LAW

1140 19th STREET, N.W.
WASHINGTON, D.C. 20036

(202) 861-0900

290 PARK AVENUE
NEW YORK, NEW YORK 10177
(212) 370-8800

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

February 24, 1986

* PC IN NEW YORK AND
WASHINGTON, D.C. ONLY

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: FEC MUR 2122; Respondents -- Senator
Paul Simon and Simon for Senate

Dear Mr. Steele:

This letter constitutes the response of Senator Paul Simon and Simon for Senate (hereinafter "the Respondents") to a complaint, MUR 2122, which alleges that Respondents may have violated the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §431 et seq. (hereinafter "the Act").

The complaint alleges that Respondents knowingly accepted contributions for the 1984 General Election from the Amalgamated Transit Union PAC (hereinafter "ATU PAC") in the aggregate amount of \$5,250.00, in excess of the statutory monetary ceiling. In addition, the complaint alleges that Respondents knowingly accepted contributions for the 1984 Primary Election from the Bridge, Structural and Ornamental Iron Workers PAC (hereinafter "Iron Workers PAC") in the aggregate amount of \$5,350.00, in violation of the statutory limitation. Further, the complaint alleges that Respondents knowingly accepted excessive contributions for the 1984 General Election in the aggregate amount of \$6,500.00 from the National Rural Letter Carriers Association PAC (hereinafter "NRLCA PAC") and in the aggregate amount of \$7,900.00 from the United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry (hereinafter "UA PAC").

Respondents acknowledge that contributions from the organizations stated above were accepted by Simon for Senate (hereinafter "the Committee"). However, Respondents deny that any such contributions were accepted in excess of the \$5,000 multi-candidate political committee contribution limit per election set forth in 2 U.S.C. §441(a)(2).

2-26-86

Attachment L (1)

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Charles N. Steele, Esq.
February 24, 1986
Page Two

ANALYSIS

To ensure compliance with the Act and the regulations promulgated thereunder, Respondents expended considerable expense and effort to establish a system to monitor and report all contributions made to its 1984 Committee. Significantly, Respondents were careful to distinguish between 1984 Primary Election Contributions and 1984 General Election contributions.

Under the Act, multi-candidate political committees are allowed to contribute a maximum of \$10,000.00 to a candidate in a full election cycle (\$5,000 for the Primary Election and \$5,000.00 for the General Election). While some contributions are accompanied by letters explicitly designating a contribution for a particular (i.e., Primary or General) election, many contributions are designated simply for the Simon election effort or by some other language.

The Committee followed a standard practice in depositing its contributions from multi-candidate committees. Unless otherwise designated, checks received before the March 20, 1984 primary election were designated as 1984 Primary contributions. 11 C.F.R. 110.1(a)(2)(ii). Contributions received after the date of the primary were designated for the 1984 General election unless specifically designated to help retire the primary debt. The Committee properly disclosed its primary debt after the 1984 Primary and continues to do so. A debt from both the 1984 Primary and General elections still exists and it is being properly reported on all FEC reports filed by the Committee.

Accordingly, the complaint is meritless because all the cited contributions, as amplified below, were accepted, allocated, reported and used by the Committee in compliance with the statutory limits and for expenditures in the appropriate elections.

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(1) The contributions received by Respondents for the 1984 Federal Primary and General Elections from ATU PAC, itemized below as reported in the Respondent Committee's FEC Reports, were within the statutory limits:

<u>DATE RECEIVED</u>	<u>AMOUNT</u>	<u>CONTRIBUTOR</u>	<u>ELECTION</u>
3/19/84	\$ 500.00	ATU PAC	Primary
5/17/84	\$2,000.00	ATU PAC	General
8/30/84	\$ 250.00	ATU PAC	General
9/13/84	\$2,500.00	ATU PAC	General

TOTAL CONTRIBUTIONS:

\$ 500.00 - Primary
\$4,750.00 - General

(2) The contributions accepted by Respondents for the 1984 Federal Primary and General Elections from the Iron Workers PAC, itemized below as reported in the Respondent Committee's FEC Reports, were within the statutory limits:

<u>DATE RECEIVED</u>	<u>AMOUNT</u>	<u>CONTRIBUTOR</u>	<u>ELECTION</u>
3/16/84	\$ 200.00	Local #103 PAC	Primary
6/6/84	\$ 250.00	Local #103 PAC	General
6/22/84	\$ 100.00	Local #103 PAC	General
7/11/84	\$1,000.00	Iron Workers PAC	General <u>1/</u>
8/13/84	\$1,000.00	Iron Workers PAC	General <u>1/</u>
8/18/84	\$1,000.00	Iron Workers PAC	General <u>1/</u>
9/27/84	\$2,000.00	Iron Workers PAC	General <u>1/</u>
10/17/84	\$4,800.00	Iron Workers PAC	Primary
10/17/84	\$ 350.00	REFUND of contributions from Local #103 PAC designated for General Election	

1/ In reporting these contributions in one entry, any mark made by the Committee in the Primary Designation box was simply an inadvertent clerical error which should have been more carefully erased before the pertinent report was filed. The Committee's records, as well as the contributor's transmittal letters, clearly demonstrate that these contributions were all for the 1984 General Election.

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TOTAL CONTRIBUTIONS:

\$5,000.00 - Primary

\$5,000.00 - General

(3) The contributions accepted by Respondents for the 1984 Federal Primary and General Elections from the NRLCA PAC, itemized below, as reported in the Respondent Committee's FEC Reports, were within the statutory limits:

<u>DATE RECEIVED</u>	<u>AMOUNT</u>	<u>CONTRIBUTOR</u>	<u>ELECTION</u>
11/23/83	\$1,000.00	NRLCA PAC	Primary
3/10/84	\$ 500.00	NRLCA PAC	Primary
7/1/84	\$2,500.00	NRLCA PAC	Primary <u>2/</u>
7/11/84	\$1,000.00	NRLCA PAC	General <u>2/</u>
9/17/84	\$2,000.00	NRLCA PAC	General <u>2/</u>
10/25/84	\$2,000.00	NRLCA PAC	General <u>3/</u>
11/4/84	\$1,000.00	NRLCA PAC	Primary <u>3/</u>

TOTAL CONTRIBUTIONS:

\$5,000.00 - Primary

\$5,000.00 - General

2/ These three contributions were reported in one entry. Both the Primary and General boxes were checked to indicate that the entry contained a Primary Election contribution as well as General Election contributions. The Committee acknowledges that it should have been more precise in reporting the election designation of each of these three contributions.

3/ Similarly, both of these contributions were reported in one entry. Both the Primary and General boxes were checked to indicate that the entry contained a Primary Election contribution as well as a General Election contribution. The Committee acknowledges that it should have been more precise in reporting the election designation of both of these contributions.

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Charles N. Steele, Esq.
February 24, 1986
Page Five

(4) Contributions accepted by Respondents for the 1984 Federal Primary and General Elections from the UA PAC, itemized below, as reported in the Respondent Committee's FEC Reports, were within the statutory limits.

<u>DATE RECEIVED</u>	<u>AMOUNT</u>	<u>CONTRIBUTOR</u>	<u>ELECTION</u>
4/19/84	\$1,000.00	UA PAC	Primary
6/14/84	\$1,000.00	UA PAC	Primary
7/23/84	\$ 100.00	Local #25 PAC	General
8/13/84	\$5,000.00	UA PAC	General
8/16/84	\$ 100.00	REFUND of contribution from Local #25 PAC designated for General Election	
10/17/84	\$ 200.00	Local #25 PAC	Primary
10/17/84	\$ 100.00	Local #25 PAC	Primary
11/4/84	\$2,800.00	UA PAC	Primary
11/26/84	\$ 100.00	REFUND for contribution from Local #25 PAC designated for Primary Election	

TOTAL CONTRIBUTIONS:

\$5,000.00 - Primary

\$5,000.00 - General

Therefore, as detailed above, Respondents deny that any contributions were accepted by its Committee in excess of the \$5,000.00 multi-candidate political committee contribution limit per election.

The complaint, as opposed to exposing excessive contribution violations, actually revealed instances of incorrect contribution reporting by the aforementioned contributors. Moreover, it should be noted that the complaint mistakenly omits some contributions made by the aforementioned contributors and fails to note refunds made by the Committee. In addition, the complaint alleges that no primary debt was

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Charles N. Steele, Esq.
February 24, 1986
Page Six

reported by the Committee when, in fact, a primary debt was properly reported throughout the election cycle and still remains outstanding. Attached are copies of the summary pages of the preprimary report and the quarterly report following the primary elections. Both reports note the outstanding primary debt.

Clearly, some of the contributions reported by the contributing political committees as 1984 Primary Election contributions were, and should have been reported as, 1984 General Election contributions and vice versa. Thus, the true focus of MUR 2122 is the incorrect checking of allocation boxes by contributors, rather than unreported and excessive contribution violations. While the precise letter of the Act may not have been complied with by the reports of these contributors, surely, and more importantly, the spirit of the Act was satisfied.

Accordingly, Respondents request that the Commission take no further action in connection with this matter.

Should the Commission decide to proceed further, Respondents respectfully request 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 Respondents

L (6)

86040610517

ACC# 9827

EPSTEIN BECKER BORSODY & GREEN, P.C.

ATTORNEYS AT LAW

1140 19TH STREET, N.W.

WASHINGTON, D.C. 20036

(202) 661-0900

250 PARK AVENUE
NEW YORK, NEW YORK 10177
(212) 370-8800

MALLICK 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) 398-5868

February 24, 1986

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

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: FEC MUR 2122; Respondents -- Senator
Paul Simon and Simon for Senate

Dear Mr. Steele:

This letter constitutes the response of Senator Paul Simon and Simon for Senate (hereinafter "the Respondents") to a complaint, MUR 2122, which alleges that Respondents may have violated the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §431 et seq. (hereinafter "the Act").

The complaint alleges that Respondents knowingly accepted contributions for the 1984 General Election from the Amalgamated Transit Union PAC (hereinafter "ATU PAC") in the aggregate amount of \$5,250.00, in excess of the statutory monetary ceiling. In addition, the complaint alleges that Respondents knowingly accepted contributions for the 1984 Primary Election from the Bridge, Structural and Ornamental Iron Workers PAC (hereinafter "Iron Workers PAC") in the aggregate amount of \$5,350.00, in violation of the statutory limitation. Further, the complaint alleges that Respondents knowingly accepted excessive contributions for the 1984 General Election in the aggregate amount of \$6,500.00 from the National Rural Letter Carriers Association PAC (hereinafter "NRLCA PAC") and in the aggregate amount of \$7,900.00 from the United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry (hereinafter "UA PAC").

Respondents acknowledge that contributions from the organizations stated above were accepted by Simon for Senate (hereinafter "the Committee"). However, Respondents deny that any such contributions were accepted in excess of the \$5,000 multi-candidate political committee contribution limit per election set forth in 2 U.S.C. §441(a)(2).

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FEB 25 1986
F12: 3-3

ANALYSIS

To ensure compliance with the Act and the regulations promulgated thereunder, Respondents expended considerable expense and effort to establish a system to monitor and report all contributions made to its 1984 Committee. Significantly, Respondents were careful to distinguish between 1984 Primary Election Contributions and 1984 General Election contributions.

Under the Act, multi-candidate political committees are allowed to contribute a maximum of \$10,000.00 to a candidate in a full election cycle (\$5,000 for the Primary Election and \$5,000.00 for the General Election). While some contributions are accompanied by letters explicitly designating a contribution for a particular (i.e., Primary or General) election, many contributions are designated simply for the Simon election effort or by some other language.

The Committee followed a standard practice in depositing its contributions from multi-candidate committees. Unless otherwise designated, checks received before the March 20, 1984 primary election were designated as 1984 Primary contributions. 11 C.F.R. 110.1(a)(2)(ii). Contributions received after the date of the primary were designated for the 1984 General election unless specifically designated to help retire the primary debt. The Committee properly disclosed its primary debt after the 1984 Primary and continues to do so. A debt from both the 1984 Primary and General elections still exists and it is being properly reported on all FEC reports filed by the Committee.

Accordingly, the complaint is meritless because all the cited contributions, as amplified below, were accepted, allocated, reported and used by the Committee in compliance with the statutory limits and for expenditures in the appropriate elections.

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Charles N. Steele, Esq.
February 24, 1986
Page Three

(1) The contributions received by Respondents for the 1984 Federal Primary and General Elections from ATU PAC, itemized below as reported in the Respondent Committee's FEC Reports, were within the statutory limits:

<u>DATE RECEIVED</u>	<u>AMOUNT</u>	<u>CONTRIBUTOR</u>	<u>ELECTION</u>
3/19/84	\$ 500.00	ATU PAC	Primary
5/17/84	\$2,000.00	ATU PAC	General
8/30/84	\$ 250.00	ATU PAC	General
9/13/84	\$2,500.00	ATU PAC	General

TOTAL CONTRIBUTIONS:

\$ 500.00 - Primary
\$4,750.00 - General

(2) The contributions accepted by Respondents for the 1984 Federal Primary and General Elections from the Iron Workers PAC, itemized below as reported in the Respondent Committee's FEC Reports, were within the statutory limits:

<u>DATE RECEIVED</u>	<u>AMOUNT</u>	<u>CONTRIBUTOR</u>	<u>ELECTION</u>
3/16/84	\$ 200.00	Local #103 PAC	Primary
6/6/84	\$ 250.00	Local #103 PAC	General
6/22/84	\$ 100.00	Local #103 PAC	General
7/11/84	\$1,000.00	Iron Workers PAC	General <u>1/</u>
8/13/84	\$1,000.00	Iron Workers PAC	General <u>1/</u>
8/18/84	\$1,000.00	Iron Workers PAC	General <u>1/</u>
9/27/84	\$2,000.00	Iron Workers PAC	General <u>1/</u>
10/17/84	\$4,800.00	Iron Workers PAC	Primary
10/17/84	\$ 350.00	REFUND of contributions from Local #103 PAC designated for General Election	

1/ In reporting these contributions in one entry, any mark made by the Committee in the Primary Designation box was simply an inadvertent clerical error which should have been more carefully erased before the pertinent report was filed. The Committee's records, as well as the contributor's transmittal letters, clearly demonstrate that these contributions were all for the 1984 General Election.

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TOTAL CONTRIBUTIONS:

\$5,000.00 - Primary

\$5,000.00 - General

(3) The contributions accepted by Respondents for the 1984 Federal Primary and General Elections from the NRLCA PAC, itemized below, as reported in the Respondent Committee's FEC Reports, were within the statutory limits:

<u>DATE RECEIVED</u>	<u>AMOUNT</u>	<u>CONTRIBUTOR</u>	<u>ELECTION</u>
11/23/83	\$1,000.00	NRLCA PAC	Primary
3/10/84	\$ 500.00	NRLCA PAC	Primary
7/1/84	\$2,500.00	NRLCA PAC	Primary <u>2/</u>
7/11/84	\$1,000.00	NRLCA PAC	General <u>2/</u>
9/17/84	\$2,000.00	NRLCA PAC	General <u>2/</u>
10/25/84	\$2,000.00	NRLCA PAC	General <u>3/</u>
11/4/84	\$1,000.00	NRLCA PAC	Primary <u>3/</u>

TOTAL CONTRIBUTIONS:

\$5,000.00 - Primary

\$5,000.00 - General

2/ These three contributions were reported in one entry. Both the Primary and General boxes were checked to indicate that the entry contained a Primary Election contribution as well as General Election contributions. The Committee acknowledges that it should have been more precise in reporting the election designation of each of these three contributions.

3/ Similarly, both of these contributions were reported in one entry. Both the Primary and General boxes were checked to indicate that the entry contained a Primary Election contribution as well as a General Election contribution. The Committee acknowledges that it should have been more precise in reporting the election designation of both of these contributions.

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Charles N. Steele, Esq.
February 24, 1986
Page Five

(4) Contributions accepted by Respondents for the 1984 Federal Primary and General Elections from the UA PAC, itemized below, as reported in the Respondent Committee's FEC Reports, were within the statutory limits.

<u>DATE RECEIVED</u>	<u>AMOUNT</u>	<u>CONTRIBUTOR</u>	<u>ELECTION</u>
4/19/84	\$1,000.00	UA PAC	Primary
6/14/84	\$1,000.00	UA PAC	Primary
7/23/84	\$ 100.00	Local #25 PAC	General
8/13/84	\$5,000.00	UA PAC	General
8/16/84	\$ 100.00	REFUND of contribution from Local #25 PAC designated for General Election	
10/17/84	\$ 200.00	Local #25 PAC	Primary
10/17/84	\$ 100.00	Local #25 PAC	Primary
11/4/84	\$2,800.00	UA PAC	Primary
11/26/84	\$ 100.00	REFUND for contribution from Local #25 PAC designated for Primary Election	

TOTAL CONTRIBUTIONS:

\$5,000.00 - Primary

\$5,000.00 - General

Therefore, as detailed above, Respondents deny that any contributions were accepted by its Committee in excess of the \$5,000.00 multi-candidate political committee contribution limit per election.

The complaint, as opposed to exposing excessive contribution violations, actually revealed instances of incorrect contribution reporting by the aforementioned contributors. Moreover, it should be noted that the complaint mistakenly omits some contributions made by the aforementioned contributors and fails to note refunds made by the Committee. In addition, the complaint alleges that no primary debt was

85040510522

Charles N. Steele, Esq.
February 24, 1986
Page Six

reported by the Committee when, in fact, a primary debt was properly reported throughout the election cycle and still remains outstanding. Attached are copies of the summary pages of the preprimary report and the quarterly report following the primary elections. Both reports note the outstanding primary debt.

Clearly, some of the contributions reported by the contributing political committees as 1984 Primary Election contributions were, and should have been reported as, 1984 General Election contributions and vice versa. Thus, the true focus of MUR 2122 is the incorrect checking of allocation boxes by contributors, rather than unreported and excessive contribution violations. While the precise letter of the Act may not have been complied with by the reports of these contributors, surely, and more importantly, the spirit of the Act was satisfied.

Accordingly, Respondents request that the Commission take no further action in connection with this matter.

Should the Commission decide to proceed further, Respondents respectfully request 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 Respondents

85040510523

REPORT OF RECEIPTS AND DISBURSEMENTS

Authorized Committee

ALABAMA

ALABAMA

Name of Candidate or Office
Simon for Senate
 Address (Street and Street)
30 W. Washington, Room 615
 City, State and Zip Code
Chicago IL 60602

Committee Identification Number
00168807
 Is this Report an Amendment?
 YES NO

TYPE OF REPORT

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

This report contains activity for: Primary Election General Election Special Election Runoff Election

SUMMARY		COLUMN A	COLUMN B
3/1/84 through 3/31/84		The Period	Calendar Year to Date
5	Net Contributions (other than loans)		
6	Total Contributions (other than loans) (from Line 5)	411,088.48	827,836.77
6b	Total Contribution Refunds (from Line 20)	-0-	2,950.00
6c	Net Contributions (other than loans) (subtract Line 6b from 6a)	411,088.48	824,886.77
7	Net Operating Expenditures		
7a	Total Operating Expenditures (from Line 17)	494,948.95	956,318.18
7b	Total Offsets to Operating Expenditures (from Line 14)	173.47	6,196.80
7c	Net Operating Expenditures (subtract Line 7b from 7a)	494,775.48	950,121.38
8	Cash on Hand at Close of Reporting Period (from Line 27)	15,160.23	
9	Debts and Obligations Owed TO The Committee (Itemize on Schedule C or Schedule D)	19,618.33	
10	Debts and Obligations Owed BY The Committee (Itemize on Schedule C or Schedule D)	221,900.75	

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

For further information, contact
 Federal Election Commission
 Toll Free 800 424 9630
 Local 202 573 4088

Patrick J. Head
 Title or Print Name of Treasurer

Patrick J. Head
 SIGNATURE OF TREASURER

4-13-84
 Date

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

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

FEC FORM 3 (3/80)

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 94727097146

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C1563

REPORTS OF RECEIPTS AND DISBURSEMENTS
For Authorized Committee

(Summary Report)

RECEIVED
OFFICE OF THE SENATOR

Name of Committee (or
Simon for Senate
Address, Number and Street
30 W. Washington (615)
City, State and Zip Code
Chicago IL 60602

FEC Identification Number
C00168807

USA MAR -7 PM 3:07

Is this Report an Amendment?

YES

NO HAND DELIVERED

Check if address is different than previously reported

TYPE OF REPORT

April 15 Quarterly Report

Twelfth day report preceding

Primary

July 15 Quarterly Report

election on 3/20/84 in the State of Illinois

October 15 Quarterly Report

Thirtieth day report following the General Election on

January 31 Year End Report

in the State of

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

Termination Report

This report contains activity for:

Primary Election

General Election

Special Election

Runoff Election

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 1/1/84 through 2/29/84		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) from Line 11(a)	416,748.29	416,748.29
(b) Total Contribution Refunds from Line 20(a)	2,950.00	2,950.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	413,798.29	413,798.29
7. Net Operating Expenditures		
(a) Total Operating Expenditures from Line 13	461,369.23	461,369.23
(b) Total Offsets to Operating Expenditures from Line 14	6,023.33	6,023.33
(c) Net Operating Expenditures (Subtract Line 7(b) from 7(a))	455,345.90	455,345.90
8. Cash on Hand at Close of Reporting Period from Line 27	100,131.74	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	14,869.33	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)	148,287.56	

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
D.C. 205 523 4068

Patrick J. Head

Type or Print Name of Treasurer

Patrick J. Head

SIGNATURE OF TREASURER

3-5-84

Date

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 1432c

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

FEC FORM 3 (3/80)

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04020101170

gan

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2122

NAME OF COUNSEL: William C. Oldaker

ADDRESS: Epstein Becker Borsody & Green, P.C.
1140 19th St., 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.

2/11/86
Date

X *Paul Simon*
Signature

RESPONDENT'S NAME: Senator Paul Simon and
Simon for Senate

ADDRESS: 821 Forest Avenue
Evanston, Illinois 60602

HOME PHONE: N/A

BUSINESS PHONE: (312) 869-8847

86040610526

36 FEB 11 P12:34

CONFIDENTIAL

**POLITICAL
ACTION
COMMITTEE**

RECEIVED AT THE FEC

CC# 9824

86 FEB 25 11:52

Suite 100, 1448 Duke Street

Alexandria, Virginia 22314

Telephone (703) 684-5545



LESTER F. MILLER, *Co-Chairman*
CLIFFORD E. EDWARDS, *Co-Chairman*
FRANK NEWHAM, *Secretary-Treasurer*

February 20, 1986

86 FEB 25 12:22

Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Gross:

RE: MUR 2122

I have received your letter of January 31, 1986 advising us the the FEC had received a complaint that the NRLCA PAC and The Simon for Senate Committee may have violated certain sections of "the Act".

I have checked my records and find that the contribution of \$1,000.00 was reported in error on schedule B as a contribution to the General Election instead of for the Primary Election. This contribution was made on October 12, 1983. Also, a contribution of \$500.00 was made to the Simon for Senate Committee on March 5, 1984 and reported to the FEC for the General Election instead of the Primary Election.

A copy of our disbursement sheet shows a "P" after the 84 which indicates a contribution for the Primary Election and therefore, when the report was typed for filing with the FEC, the error was made. It was our intention that the above contributions be made to the Primary election.

I am enclosing an amended report for the Period Ending December 31, 1983 and Period Ending March 31, 1984.

We appreciate this matter being brought to our attention and acceptance of our amended reports.

Sincerely,

Frank Newham

Frank Newham
Treasurer, NRLCA PAC

FN:fn
enclosures

86040510527

LAW OFFICES
O'DONOGHUE & O'DONOGHUE

THE FEC
GCC# 9747
86 FEB 18 All: 46

MARTIN F. O'DONOGHUE
(1902-1973)
PATRICK C. O'DONOGHUE
(1930-1978)
DONALD J. CAPUANO
JAMES R. O'CONNELL*
ROBERT MATISOFF
JOYCE A. MADER
SALLY M. ARMSTRONG
BRIAN A. POWERS
JOHN L. BOHMAN
JOSEPH P. BOYLE*
FRANCIS J. MARTORANA
ROBERT J. HENRY**
KENNETH M. JOHNSON†

WASHINGTON, D.C. OFFICE
4748 WISCONSIN AVENUE, N.W.
WASHINGTON, D.C. 20016
(202) 362-0041

MARYLAND OFFICE
9 NORTH ADAMS STREET
ROCKVILLE, MD. 20850
(301) 281-0929

* D.C. & MD.
** OHIO ONLY
† PA. ONLY

February 14, 1986

Federal Election Commission
999 E Street
Washington, D.C. 20463

Attention: Charles N. Steele
General Counsel

Re: MUR 2122

Dear Sir:

With respect to this matter, this office is counsel for the following respondents:

- (a) United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry of the United States and Canada, AFL-CIO - Political Education Committee ("UAPEC");
- (b) the treasurer of the UAPEC, incorrectly identified in the complaint as Joseph Walsh. The treasurer of the UAPEC is Joseph Cribben. (A December 15, 1983 letter to the Commission notifying the Commission of Mr. Walsh's resignation and Mr. Cribben's appointment is attached to the enclosed response as Exhibit A.);
- (c) Plumbers and Pipefitters Local Union 25 PAC; and
- (d) the Treasurer of the Local Union 25 PAC, Jerome D. O'Leary;

Appropriate Statements of Designation of Counsel are enclosed.

Attached hereto is the written response of the above-named respondents to the complaint. The position of each of these respondents is that there is no merit whatsoever to the

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OFFICE OF THE
GENERAL COUNSEL

complaint and that it should be dismissed with respect to these respondents.

Should you have any further questions, please contact the undersigned.

Very truly yours,

Robert Matisoff
Robert Matisoff

RM:man
Attachment

86040610529

Alenah Board
PAGES 001, 02, 03, 04, 05, 06, 07, 08, 09, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100

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

JEFFREY W. RYAN
4757 Parkman Court
Annandale, Virginia 22003,

Complainant,

v.

PAUL SIMON, SIMON FOR SENATE
COMMITTEE, AMALGAMATED TRANSIT UNION -
COPE, IRONWORKERS POLITICAL ACTION
LEAGUE, NATIONAL RURAL LETTER
ASSOCIATION - PAC, UNITED ASSOCIATION
OF JOURNEYMEN AND APPRENTICES OF THE
PLUMBING AND PIPE FITTING INDUSTRY -
PAC, and PLUMBERS AND PIPEFITTERS
LOCAL UNION #25 POLITICAL ACTION
COMMITTEE AND ALL THE COMMITTEES'
TREASURERS,

Respondents.

MUR 2122

RESPONSE TO COMPLAINT OF UNITED ASSOCIATION OF
JOURNEYMEN AND APPRENTICES OF THE PLUMBING AND
PIPEFITTING INDUSTRY POLITICAL EDUCATION COMMITTEE,
PLUMBERS AND PIPEFITTERS LOCAL UNION 25 POLITICAL
ACTION COMMITTEE AND THEIR TREASURERS

This shall constitute the response to the complaint of
the following respondents:

- (a) United Association of Journeymen and Apprentices
of the Plumbing and Pipefitting Industry of the
United States and Canada, AFL-CIO - Political
Education Committee ("UAPEC");

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Michael Bon...

- (b) the treasurer of the UAPEC, incorrectly identified in the complaint as Joseph Walsh. The treasurer of the UAPEC is Joseph Cribben. (A December 15, 1983 letter to the Commission notifying the Commission of Mr. Walsh's resignation and Mr. Cribben's appointment is attached as Exhibit A.);
- (c) Plumbers and Pipefitters Local Union 25 PAC; and
- (d) the Treasurer of the Local Union 25 PAC, Jerome D. O'Leary;

The position of each of these respondents is that there is no merit whatsoever to the complaint and that it should be dismissed with respect to these respondents.

The claim made against these respondents is that the UAPEC, together with its affiliated committee, the Local Union 25 PAC, contributed in excess of \$5000 to the general election campaign of the Simon for Senate Committee. The complaint correctly alleges that on July 3, 1984 the UAPEC contributed \$5000 designated for the general election. Thereafter, it is alleged, the \$5000 limitation of 2 U.S.C. § 441(a) was exceeded by additional contributions totaling \$3100. As we understand the theory of the complaint, this \$3100 excess of contributions to the general election is composed of the following:

- (a) An October 26, 1984 contribution of \$2800 from the UAPEC. According to the complaint, this contribution wa "undesigned"; since it was undesigned and made after the primary election,

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the complaint alleges, it must be allocated to the general election, pursuant to 11 C.F.R. § 110.1(a)(2)(ii)(B).

- (b) An August 22, 1984 contribution of \$100 from the Local Union 25 PAC and a September 19, 1984 contribution of \$200 from the Local Union 25 PAC, both designated to reduce the Simon campaign primary debt, at a time when it is alleged there was no primary debt. Thus, it is argued, these two contributions totaling \$300 must be allocated to the general election, pursuant to 11 C.F.R. § 100.1(a)(2)(i).

Both aspects of this theory are flawed. First of all, contrary to what is alleged in the complaint, the October 26, 1984 contribution of \$2800 was specifically designated in writing at the time it was made for the primary campaign. Attached hereto as Exhibit B is an October 29, 1984 letter from the United Association, the UAPEC's parent organization, transmitting the \$2800 contribution to the Simon campaign, specifically stating that since the \$5000 general election limitation was already met, the \$2800 contribution "can only be applied to your primary campaign expenditures" [emphasis added]. Not only does this letter, Exhibit B, demonstrate that the \$2800 contribution was designated in writing for the primary campaign, but it also reveals a scrupulous, good-faith attempt by the UAPEC to comply with the contribution limitations of federal law.

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Nothing in the language of the regulation relied upon by the complainant, 11 C.F.R. § 110.1(a)(2), or in any other regulation, indicates that the October 29, 1984 letter, Exhibit B, is an inadequate form of "designation in writing". The basis for the claim that the \$2800 contribution was undesignated apparently is that on the appropriate report of receipts and expenditures filed by the UAPEC with the Commission, covering the period October 18, 1984 through November 26, 1984, a check mark in the box marked "primary" had been inadvertently omitted in reporting the \$2800 contribution. If anything, the failure to check the "primary" box arguably may be a technical deficiency in reporting. However, this is not the alleged violation set forth in the complaint. Moreover, the failure to check the box does not establish that the contribution itself was not designated in writing for the primary (which Exhibit B shows it clearly was) or give rise to a violation of the contribution limitations.¹

Similarly, there is no merit to the claim that the August 22, 1984 contribution of \$100 and the September 19, 1984 contribution of \$200 from the Local Union 25 PAC must be allocated to the general election. Attached hereto as Exhibits C and D are letters transmitting these contributions to the Simon campaign from Local 25, the parent organization of the Local 25 PAC. Both letters clearly and unequivocally designate the

¹To correct any deficiency in reporting, we hereby enclose, as Exhibit E, a revised and amended page 4 of the UAPEC's Report of Receipts and Disbursements covering the period October 18, 1984 through November 26, 1984, with a check mark in the primary box with regard to the \$2800 contribution for the Simon Campaign.

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contributions in question for "primary debt reduction" or "primary election deficit". The complaint alleges that at the time these contributions were made, there was no primary debt, as reported by the Simon campaign. First of all, it is our understanding that at all relevant times the Simon Campaign has been reporting a primary debt on its reports filed with the Commission. More important, the allegation that there was no primary debt is contrary to what the Local 25 PAC now understands and understood at the time the contributions were made. Indeed, we have been orally informed by the Simon Committee that not only was there a net primary debt at the time these contributions were made, but there still remains a primary debt at this time. If, despite the existence of a primary debt, the Simon campaign erroneously reported that there was no debt on its reporting forms filed with the Commission, that is arguably a reporting deficiency of the Simon campaign itself, but not a violation in any respect by the Local Union 25 PAC. On the other hand, if the information supplied by the Simon campaign to the Local Union 25 PAC about the existence of a primary debt was incorrect, and there was, in fact no such debt in existence at the time of the contribution, the Local Union 25 PAC cannot be faulted for relying in good faith upon the information it was supplied. As noted, the transmittal letters, Exhibits C and D, clearly designate the contributions for relieving the primary debt. The Simon campaign never returned those contributions or advised the Local Union 25 PAC, in response to these letters, that there was

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actually no primary debt. Thus, there is no basis at all for action against the Local Union 25 PAC.

In sum, the particular violations alleged in the complaint have no support in the facts. The \$2800 contribution was specifically designated in writing for the primary campaign; the contributions of \$100 and \$200 were designated for the primary on the understanding that a primary debt existed. Thus, there is no basis for the claim that these contributions must be allocated to the general election and, in turn, no basis for the claim that the \$5000 general election limitation was exceeded. Accordingly, the complaint against the UAPEC and the Local union 25 PAC and their treasurers should be dismissed.

Should the Commission decide to proceed further, notwithstanding this reponse, respondents request that the matter be handled through voluntry, informal conciliation.

Respectfully submitted,

O'DONOGHUE & O'DONOGHUE
4748 Wisconsin Avenue, N.W.
Washington, D.C. 20016
(202) 362-0041

By 
Robert Matisoff

86040610535

LAW OFFICES
O'DONOGHUE & O'DONOGHUE

MARTIN F. O'DONOGHUE
(1902-1973)
PATRICK C. O'DONOGHUE
(1930-1979)
DONALD J. CAPUANO
JAMES R. O'CONNELL *
ROBERT MATISOFF †
JOYCE A. MADER ‡
SALLY M. ARMSTRONG
BRIAN A. POWERS
JOHN L. BOHMAN
PETER J. BIENSTEKER
JOSEPH P. BOYLE §
FRANCIS J. MARTORANA

* D.C., MD. & VA.
† D.C. & VA.
‡ D.C. & PA.
§ MD. ONLY

WASHINGTON, D.C. OFFICE
4748 WISCONSIN AVENUE, N.W.
WASHINGTON, D.C. 20016
(202) 362-0041

MARYLAND OFFICE
9 NORTH ADAMS STREET
ROCKVILLE, MD. 20850
(301) 281-0928

December 15, 1983

Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: C00012476

Gentlemen:

This office is counsel to the United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry of the United States and Canada, AFL-CIO, Political Education Committee.

Please be advised that there has been a change in the position of Treasurer of the Committee. Joseph A. Walsh, previously Treasurer, has resigned that position. The new Treasurer is Joseph Cribben.

Very truly yours,


Robert Matisoff

RM:cmh

EXHIBIT A

86040510536



Office of the General President—Marvin J. Boede

General Office File Reference:

United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry of the United States and Canada

Composed of journeymen and apprentices who have jurisdiction over every branch of the plumbing and pipe fitting industry

United Association Building, 901 Massachusetts Ave., N.W., Washington, D.C. 20001 Phone (202) 626-5823

October 29, 1984

Simon for U.S. Senate
30 W. Washington Street
Chicago, IL 60602

Gentlemen:

Enclosed you will find a check for \$2,800 from the UA Political Education Committee.

Please note that the UAPEC has already contributed the maximum of \$5,000 for the general election. Therefore, the enclosed contribution can only be applied to your primary campaign expenditures. Our records indicate that this contribution will bring us to the \$5,000 ceiling, including an earlier contribution of \$2,000 from the UAPEC and a \$200 contribution from our local union in Rock Island.

With best wishes for a successful campaign, I am

Sincerely yours,

Marvin J. Boede
General President

vlj

Enclosure

EXHIBIT B

MARVIN J. BOEDE
General President

JOSEPH A. WALSH
General Secretary-Treasurer

M. EDDIE MOORE
Asst. General President

CHARLES J. HABIG
Asst. General Secretary-Treasurer

8-6040510537



United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry

... of journeymen and apprentices who have entered this craft through the plumbing and pipe fitting industry

LOCAL NO 25

STREET ADDRESS 1228 3rd Avenue

CITY STATE ZIP Rock Island, Illinois 61201

SUBJECT MATTER 1984 Primary Election "Debt Reduction" SIMON FOR SENATE

DATE August 22, 1984

Mr. Paul Simon
SIMON FOR SENATE
30 West Washington
Suite 615
Chicago, Illinois 60602

Dear Mr. Simon:

Enclosed is a contribution by Plumbers & Pipefitters Local Union #25 Political Action Fund, 1228 3rd Avenue, Rock Island, Illinois in the amount of \$100.00 to be applied to your 1984 Primary Election deficit.

I look forward to working with you as the future Senator for the State of Illinois.

Sincerely,

PLUMBERS & PIPEFITTERS
LOCAL UNION #25

Jerome D. O'Leary
Business Manager

JDO'L/ka
enclosure

86040510538



United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry of the United States and Canada

Composed of journeymen and apprentices who have jurisdiction over every branch of the plumbing and pipe fitting industry

LOCAL NO 25

STREET ADDRESS 1228 3rd Avenue

CITY, STATE ZIP Rock Island, Illinois 61201

SUBJECT MATTER 1984 Primary Election "Debt Reduction" SIMON FOR SENATE

DATE September 19, 1984

Mr. Paul Simon
SIMON FOR SENATE
30 West Washington
Suite 615
Chicago, Illinois 60602

Dear Mr. Simon:

Enclosed is a contribution by Plumbers & Pipefitters Local Union #25 Political Action Fund, 1228 3rd Avenue, Rock Island, Illinois in the amount of \$200.00 to be applied towards your 1984 Primary Election deficit.

Wishing you a successful upcoming election.

Sincerely,

PLUMBERS & PIPEFITTERS
LOCAL UNION #25

Jerome D. O'Leary
Business Manager

JDO' L/ka
enclosure

86040510539

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) **United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry of the United States and Canada - Political Education Committee**

K
 6040510540

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Schwerdtfeger for Cong. P. O. Box 275 Elizabeth, Ill. 61025	Transfer 16th District - Ill. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/84	1,000.00
B. Full Name, Mailing Address and ZIP Code Simon for U. S. Sen. 30 W. Washington St. Chicago, Ill. 60602	Transfer Senate - Ill. Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/84	2,800.00
C. Full Name, Mailing Address and ZIP Code George Brown for Cong. P. O. Box 1421 Riverside, Calif. 92502	Transfer 36th District - Calif. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/84	500.00
D. Full Name, Mailing Address and ZIP Code Lipinski for Cong. 6242 W. 59th St. Chicago, Ill. 60638	Transfer 5th District - Ill. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/26/84	500.00
E. Full Name, Mailing Address and ZIP Code McNulty for Cong. 4507 E. Broadway Tucson, Az. 85711	Transfer 5th District - Az Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/31/84	1,000.00
F. Full Name, Mailing Address and ZIP Code Slattery for Cong. P. O. Box 1978 Topeka, Kansas 66601	Transfer 2nd District - Ks. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/31/84	500.00
G. Full Name, Mailing Address and ZIP Code Winter for U. S. Senate P. O. Box 665 Columbia, Ms. 39429	Transfer Senate - Ms. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/31/84	1,000.00
H. Full Name, Mailing Address and ZIP Code Grove for U. S. Senate 2200 Washington Sq. 100 Washington Ave., South Minneapolis, Mn. 55401	Transfer Senate - Mn. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/31/84	1,000.00
I. Full Name, Mailing Address and ZIP Code McHugh for Cong. P. O. Box 61 Ithaca, N. Y. 14851	Transfer 28th District - N. Y. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/31/84	500.00
SUBTOTAL of Disbursements This Page (optional)			8,800.00
TOTAL This Period (last page this line number only)			

*

STATEMENT OF DESIGNATION OF COUNSEL

NUR 2212

NAME OF COUNSEL: O'DONOGHUE & O'DONOGHUE

ADDRESS: 4748 Wisconsin Avenue, N.W.
Washington, D.C. 20016
Attn. Robert Matisoff

TELEPHONE: 202-362-0041

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.

2-14-86
Date

Joseph M. Cribben
Signature

RESPONDENT'S NAME: United Association of Journeymen and Apprentices
of the Plumbing and Pipefitting Industry of the
United States and Canada Political Education Committee

ADDRESS: 901 Massachusetts Avenue, N.W.
Washington, D.C. 20001
Attn. Joseph Cribben, Treasurer

HOME PHONE: _____

BUSINESS PHONE: 202-628-9823

86040510541

STATEMENT OF DESIGNATION OF COUNSEL

NR 2122

NAME OF COUNSEL: O'Donoghue & O'Donoghue

ADDRESS: 4748 Wisconsin Avenue., N.W.

Washington, D.C. 20016

Attn: Mr. Bob Matisoff

TELEPHONE: 202)362-0041

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.

2-07-86
Date

Jerome D. O'Leary
Signature

RESPONDENT'S NAME: PLUMBERS & PIPEFITTERS L.U. #25 PAC

ADDRESS: Jerome D. O'Leary, Treasurer
1228 3rd Avenue

Rock Island, Illinois 61201

HOME PHONE: 309)788-4569

BUSINESS PHONE: 309)788-4569

8 6 0 4 0 3 1 0 5 4 2

QCC#9720

THE FEC

HAND DELIVERED

86 FEB 14 A 8: 11

AMALGAMATED TRANSIT UNION

5025 WISCONSIN AVE., N.W. WASHINGTON, D.C. 20016 (202) 537-1645

February 13, 1986

86 FEB 14 A 10: 43

GENERAL COUNSEL



Frances B. Hagan, Esq.
General Counsel's Office
Federal Election Commission
1325 K Street, N. W.
Washington, D. C.

Re: FEC MUR 2122

Dear Ms. Hagan:

This letter constitutes the response of the Amalgamated Transit Union-Committee on Political Education (ATU-COPE) and Raymond C. Wallace, individually and in his capacity as Treasurer of ATU-COPE, (herein "respondents") to your letter dated January 31, 1986, stating that the Commission has received a complaint alleging that the respondents may have violated the Federal Election Campaign Act of 1971, as amended ("the Act").

The complaint, FEC MUR 2122, alleges that the respondent political committee and its treasurer violated Sections 441a(a)(2)(A) and 441a(f) of the Act by making contributions to the Simon for Senate Committee for the 1984 federal general election in the amount of \$5,250.00, exceeding the \$5,000.00 per election limitation in the Act by \$250.00.

We submit that respondent's contributions to the Simon for Senate Committee did not exceed the \$5,000.00 contribution per election limitation of the Act. As set forth below, the \$500.00 contribution received by the Committee on March 19, 1984, was incorrectly reported by ATU-COPE to the FEC as a general campaign fund contribution. This filing was subsequently corrected, redesignating the contribution for the primary election as originally intended. The contribution was, however, properly reported by the Simon for Senate Committee as a primary campaign contribution placing our distributions as described herein within the Act's limitations for both the primary and general 1984 elections.

As referenced in the complaint, in 1984, respondents distributed four separate campaign contributions to the Simon for Senate Committee. A \$500.00 contribution was distributed on March 14, 1984, and received by the Committee on March 19, 1984. A second \$2,000.00 contribution was distributed on

86040510543



April 5, 1984, and received by the Committee on May 17, 1984. A third contribution for \$250.00 was distributed on June 25, 1984, and received by the Committee on August 30, 1984. Finally, a contribution for \$2,500.00 was distributed on September 5, 1984, and received by the campaign Committee on September 13, 1984. Copies of respondents monthly FEC reports listing these campaign contributions are attached hereto as Exhibits A-D respectively. A copy of the March 14, 1984, check is also attached as Exhibit E. Pursuant to respondents regular operating procedure, each of these campaign contributions was accompanied by a standard ATU-COPE cover letter referencing the enclosed check. Neither the cover letters nor the checks designated the March or subsequent contributions for either the primary or general elections. A copy of the standard ATU-COPE cover letter is attached hereto as Exhibit F. Copies of the actual letter sent with the individual contributions were not kept in our files.

By letter dated January 16, 1986, respondents advised the Federal Election Commission that they inadvertently listed on their Schedule B March 1984 FEC report the \$500.00 March 14, campaign contribution as designated for the general election. They further informed the FEC that the March 1984, contribution was for the then upcoming primary election, held on March 20, 1984. Accompanying the January 16, 1986, letter was a corrected copy of respondents Schedule B FEC report with a request that the Commission's records be amended accordingly. A copy of this January 16, 1986, letter and attachment is enclosed herein as Exhibit G.

As respondents records indicate and as your investigation will establish, although the ATU-COPE's March 14, 1984, Simon for Senate contribution was incorrectly reported as being for the 1984 general election, that contribution was contemporaneously and correctly reported by the Simon for Senate campaign as a primary election contribution. Further, as the ATU-COPE cover letter and check did not designate the specific election for which the contribution was being forwarded, the provisions of 11 C.F.R. Sections 110.1a(2)(ii)(A) and 110.2(a)(1) govern establishing that the March 1984, contribution which preceded the scheduled primary election should be credited for that election and not for the general election.

At no time did respondents herein knowingly or intentionally undertake campaign contributions in excess of the Act's legal limitations.

As a result of filing our amended March 1984, FEC report correctly redesignating our March 1984, campaign contribution for the primary election, as properly recorded by the Simon for Senate Campaign Committee, we submit that respondents herein did not violate the ceiling amounts permitted by Section 441a(a)(2)(A) of the Act.

8 6 0 4 0 6 1 0 5 4 4

For the foregoing reasons, respondents respectfully request that the Commission dismiss and close the file on the instant matter involving respondents herein.

Sincerely yours,

Robert A. Molofsky

Robert A. Molofsky
Counsel for Respondents

Raymond C. Wallace
Individually and as
Treasurer of the
Amalgamated Transit
Union Committee on
Political Education;

Amalgamated Transit Union
Committee on Political
Education

cc: Mr. Jim La Sala
International President
Amalgamated Transit Union

Mr. Raymond Wallace
International Secretary-
Treasurer
Amalgamated Transit Union
ATU-COPE Director

86040610545

STATEMENT OF DESIGNATION OF COUNSEL

MUR FEC MUR 2122

NAME OF COUNSEL: Robert A. Molofsky

ADDRESS: 5025 Wisconsin Avenue, N. W.
Washington, D. C. 20016

TELEPHONE: (202) 537-1645

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.

February 13, 1986
Date

Raymond C. Wallace
Signature

RESPONDENT'S NAME: Raymond C. Wallace

ADDRESS: 5025 Wisconsin Avenue, N. W.
Washington, D. C. 20016

HOME PHONE: (301) 654-1408

BUSINESS PHONE: (202) 537-1645

86040610546



Amalgamated Transit Union

5025 Wisconsin Ave., N.W., Washington, D.C. 20016
202-337-1645

Office of the International Secretary-Treasurer

April 9, 1984

Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Gentlemen:

Enclosed please find the March report for the
Amalgamated Transit Union - COPE.

Trusting this meets with your satisfaction, I
remain

Sincerely,

R.C. Wallace
International Secretary-
Treasurer/COPE Director

:ngl

Enclosure

86040610547

For a Political Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (in Full)

AMALGAMATED TRANSIT UNION - COPE

Address (Number and Street)

5025 Wisconsin Avenue, N.W.

City, State and ZIP Code

Washington, DC 20016

Check here if address is different than previously reported.

2. FEC Identification Number

C00032995

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 3/1/84 - 3/30/84

Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

Thirtieth day report following the General Election

on _____ in the State of _____

Termination Report

(b) Is this Report an Amendment?

YES

NO

SUMMARY

5. Covering Period 3/1/84 through 3/30/84

6. (a) Cash on hand January 1, 1984

(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

		\$ 156,011.02
\$ 158,260.23		
\$ 17,226.50	\$	44,775.71
\$ 175,486.73	\$	200,786.73
\$ 12,900.00	\$	38,200.00
\$ 162,586.73	\$	162,586.73
\$ NONE		
\$ NONE		

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

R.C. Wallace

Type or Print Name of Treasurer

R.C. Wallace

SIGNATURE OF TREASURER

4/15/84

Date

For further information contact:

Federal Election Commission

Toll Free 800-424-9630

Local 202-623-4068

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.

FEC FORM 3X (3/80)

86040610548

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 TRANSIT UNION - COPE

96040610549

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Committee to Reelect Claudine Box 1632 Providence, RI 02901	Re-election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/06/84	\$ 250.00
B. Full Name, Mailing Address and ZIP Code Friends of Gerald Klacsko 3360 So. 43rd Street Milwaukee, WI 53219	Purpose of Disbursement Re-election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/12/84	750.00
C. Full Name, Mailing Address and ZIP Code People for Mrazek P.O. Box 303 Centerport, NY 11721	Purpose of Disbursement Re-election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/14/84	1,000.00
D. Full Name, Mailing Address and ZIP Code Paul Simon for Senate 30 West Washington Street Chicago, IL 60602	Purpose of Disbursement Re-election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/14/84	500.00
E. Full Name, Mailing Address and ZIP Code The Friends of Glenn Anderson 923 Fifteenth Street, N.W. Washington, DC 20005	Purpose of Disbursement Re-election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/14/84	500.00
F. Full Name, Mailing Address and ZIP Code Oberstar '84 Committee & Bob Kileer, Treasurer 333 Sibley, Room 418 St. Paul, MN 55101	Purpose of Disbursement Re-election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/14/84	500.00
G. Full Name, Mailing Address and ZIP Code Friends of Lane Evans Committee 210 7th Street, S.W. #B-15 Washington, DC 20003	Purpose of Disbursement Re-election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/14/84	250.00
H. Full Name, Mailing Address and ZIP Code Howard for Congress Committee & Bill Eyers, Treasurer 500 State Highway 34 Matawan, NJ 07747	Purpose of Disbursement Re-election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/14/84	1,000.00
I. Full Name, Mailing Address and ZIP Code Kolter for Congress 6 E Street, S.E. Washington, DC 20003	Purpose of Disbursement Re-election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/14/84	500.00
SUBTOTAL of Disbursements This Page (optional)			\$ 5,250.00
TOTAL This Period (last page this line number only)			



Amalgamated Transit Union

5025 Wisconsin Ave., N.W., Washington, D.C. 20016
202-337-1645

Office of the International Secretary-Treasurer

May 10, 1984

Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Gentlemen:

Enclosed please find the April report for the
Amalgamated Transit Union - COPE.

Trusting this meets with your satisfaction, I
remain

Sincerely,

R.C. Wallace
International Secretary-
Treasurer/COPE Director

:ngl

Enclosure

86040610550

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

Name of Organization (in Full)

AMALGAMATED TRANSIT UNION - COPE

Report Covering the Period:

From: **4/1/84**

To: **4/30/84**

**COLUMN A
Total This Period**

**COLUMN B
Calendar Year-To-Date**

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unitemized \$ 13,835.16)

(b) Political Party Committees

(c) Other Political Committees

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

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 11(d), 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 a(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 26(a), 26(b) and 26(c))

27. OTHER DISBURSEMENTS

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

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

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

30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)

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

8,604,051.05

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11(a)	\$ 13,835.16	\$ 58,610.77	11(a)
11(b)			11(b)
11(c)			11(c)
11(d)	13,835.16	58,610.77	11(d)
12			12
13			13
14			14
15			15
16			16
17			17
18	13,835.16	58,610.77	18
19			19
20			20
21	67,950.00	100,050.00	21
22			22
23			23
24			24
25			25
26(a)			26(a)
26(b)			26(b)
26(c)			26(c)
26(d)			26(d)
27		6,100.00	27
28	67,950.00	106,150.00	28
29	13,835.16	58,610.77	29
30			30
31	13,835.16	58,610.77	31
32			32
33			33

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 TRANSIT UNION - COPE

85040510552

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Frank J. Pistella, State Rep. 506 S. Millvale Avenue Pittsburgh, PA 15224	Re-election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/02/84	\$ 50.00
B. Full Name, Mailing Address and ZIP Code Friends of Howell Heflin Comm. & Frontis S. Winford, Treas. P.O. Box 1984 Tuscumbia, AL 35674	Re-election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/05/84	1,500.00
C. Full Name, Mailing Address and ZIP Code Simon for Senate & Patrick J. Head 30 West Washington, Rm. 615 Chicago, IL 60602	Election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/05/84	2,000.00
D. Full Name, Mailing Address and ZIP Code Committee To Reelect Senator Huddleston & George E. Spaldin, Jr. Box 22884, Lexington, KY 40522	Re-election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/05/84	2,000.00
E. Full Name, Mailing Address and ZIP Code Bill Bradley for U.S. Seante '84 & Peter J. Burke, Jr. 1553 Oakland Avenue Union, NJ 07083	Re-election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/05/84	2,000.00
F. Full Name, Mailing Address and ZIP Code Friends of Max Baucus & Mr. R. Stephen Browning P.O. Box 216 Helena, MT 59624	Re-election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/05/84	1,000.00
G. Full Name, Mailing Address and ZIP Code Winter For Senate P.O. Box 23148 Jackson, MS 39225	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/05/84	1,000.00
H. Full Name, Mailing Address and ZIP Code Foglietta '84 Committee & Michael T- Foglietta 730 Fitzwater Street Philadelphia, PA 19147	Re-election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/05/84	500.00
I. Full Name, Mailing Address and ZIP Code Bosco for Congress 16 Royal Dominion Court Bethesda, MD	Re-election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	4/05/84	1,000.00
SUBTOTAL of Disbursements This Page (optional)			\$ 11,050.00
TOTAL This Period (last page this line number only)			



Amalgamated Transit Union

3025 Wisconsin Ave., N.W., Washington, D.C. 20016
202-537-1645

Office of the International Secretary-Treasurer

July 13, 1984

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

Gentlemen:

Enclosed please find a copy of the June report for the Amalgamated Transit Union - COPE.

Trusting this meets with your satisfaction, I remain

Sincerely,

R.C. Wallace
International Secretary-
Treasurer/COPE Director

:ngl

Enclosure

86040510553

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

(Summary Page)

ALIGN AREA ALIGN AREA

1. Name of Committee (In Full)
AMALGAMATED TRANSIT UNION - CORE

Address (Number and Street)
5025 Wisconsin Avenue, N.W.

City, State and ZIP Code
Washington, D.C. 20016

Check here if address is different than previously reported.

2. FEC Identification Number
C0032995

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 6/1/84 - 6/30/84
 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>6/1/84</u> through <u>6/30/84</u>		
6. (a) Cash on hand January 1, 19 <u>84</u>		\$ 156,011.02
(b) Cash on Hand at Beginning of Reporting Period	\$ 97,843.81	
(c) Total Receipts (from Line 18)	\$ 46,115.69	\$ 119,348.48
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 143,959.50	\$ 275,359.50
7. Total Disbursements (from Line 28)	\$ 8,600.00	\$ 140,000.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 135,359.50	\$ 135,359.50
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	\$ None	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ None	

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

For further information contact:
 Federal Election Commission
 Toll Free 800-424-9630
 Local 202-523-4088

R.C. Wallace
 Type or Print Name of Treasurer

R.C. Wallace
 SIGNATURE OF TREASURER

6/12/84
 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.

86040510554

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 TRANSIT UNION - COPE

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Joe White Local Union 842 2520 Thatcher Wilmington, DE 19802	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): delegate	6/1/84	\$ 200.00
Rose Marie Lovano 13905 Oakview Blvd Garfield Heights, OH 44125	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): delegate	6/7/84	500.00
John H. Leinen E. 102 Boone Avenue Spokane, WA 99202	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): delegate	6/7/84	500.00
Joe White 2520 Thatcher Wilmington, DE 19802	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): delegate	6/7/84	300.00
Barbara Kennelly for Congress & Mary Grazen CBT 4 North Main Street West Hartford, CT 06107	Re-election Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	6/15/84	250.00
Chris Dodd for Senate 2670 Main Street Glastonbury, CT 06033	Re-election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/15/84	250.00
Durbin for Congress Committee M. Beth Averkamp, Treasurer P.O. Box 1949 Springfield, IL 62705	Re-election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/25/84	100.00
Simon Reception Center Les Collins & David Coontz, Ch. P.O. Box 1425 Springfield, IL 62705	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/25/84	250.00
Committee to Reelect Joe Kolter Anthony Cosentino, Treasurer 1522 7th Avenue P.O. Box 2 Beaver Falls, PA 15010	Re-election Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/26/84	500.00
SUBTOTAL of Disbursements This Page (optional)			2,850.00
TOTAL This Period (last page this line number only)			

86040510555



Amalgamated Transit Union

5025 Wisconsin Ave., N.W., Washington, D.C. 20016
202-537-1645

Office of the International Secretary-Treasurer

October 18, 1984

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

Gentlemen:

Enclosed please find a copy of the September, 1984,
report for the Amalgamated Transit Union - COPE.

Trusting this meets with your satisfaction, I remain

Sincerely,

R. C. Wallace
International Secretary-
Treasurer/COPE Director

amf

Enclosure

85040510556

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

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)
AMALGAMATED TRANSIT UNION -- COPE

Address (Number and Street)
5025 Wisconsin Avenue, N. W.

City, State and ZIP Code
Washington, DC 20016

Check here if address is different than previously reported.

2. FEC Identification Number
C00032995

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 9-1-84 thru 9-30-84
 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>9-1-84</u> through <u>9-30-84</u>		
6. (a) Cash on hand January 1, 19 <u>84</u>			\$ 156,011.02
(b) Cash on Hand at Beginning of Reporting Period		\$ 170,105.68	
(c) Total Receipts (from Line 18)		\$ 22,183.50	\$ 177,478.16
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 192,289.18	\$ 333,489.18
7. Total Disbursements (from Line 28)		\$ 143,260.00	\$ 284,460.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 49,029.18	\$ 49,029.18
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		\$ NONE	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ NONE	

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

For further information contact:
 Federal Election Commission
 Toll Free 800-424-9530
 Local 202-523-4088

Raymond C. Wallace
 Type or Print Name of Treasurer

Raymond C. Wallace
 SIGNATURE OF TREASURER

October 18, 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 3e are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

AMALGAMATED TRANSIT UNION
COPE ACCOUNT—VOLUNTARY FUND

5025 WISCONSIN AVENUE, N.W.
WASHINGTON, D.C. 20016

No. 1114

March 14 19 84 15-55
540

PAY TO THE
ORDER OF

-----Paul Simon for Senate----- 50560 203541491 \$ 500.00

-----Five Hundred Dollars & 00/100----- DOLLARS

AMERICAN SECURITY
AND TRUST COMPANY
WASHINGTON, D.C. 20013

[Signature]
INTERNATIONAL PRESIDENT
[Signature]
INTERNATIONAL SECRETARY-TREASURER

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350406

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MR 84 21
PAID
A.S.S. S.C.

RECEIVED BALTIMORE MD 052000278

MR 84 19
PAY ANY BANK
EXCHANGE NATL BK
CHICAGO IL

PAY EXCHANGE NATIONAL BANK
by check or cash - #056007
BIMON FOR SENATE



Amalgamated Transit Union

5025 Wisconsin Ave., N.W., Washington, D.C. 20016
202-537-1645

Office of the International Secretary-Treasurer

26040510561

The Amalgamated Transit Union welcomes the opportunity to support the activities of your committee.

Enclosed please find a check for _____ and a receipt which is to be returned to my office.

With best wishes, I am

Sincerely,

R. C. Wallace
International Secretary-
Treasurer and COPE Director

Enclosures





Amalgamated Transit Union

3025 Wisconsin Ave., N.W., Washington, D.C. 20016
202-537-1645

Office of the International Secretary-Treasurer

January 16, 1986

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

Dear Sir:

A review of our, 1984, contributions to the Paul Simon for Senate Campaign, indicates that we inadvertently listed our \$500, March 14, 1984, contribution as designated for the General Election. This contribution was for the upcoming primary election.

Accordingly, we hereby resubmit a corrected copy of our Schedule B, FEC report and request that your records be amended accordingly.

If you should have any questions, please feel free to contact my office regarding this matter.

Sincerely,

R. C. Wallace
International Secretary-
Treasurer/COPE Director

/amf

encl.

CC: Paul Simon for Senate Campaign
30 West Washington Street
Chicago, IL 60602

State Board of Elections
P. O. Box 4187
Springfield, IL 62708

86040510562



SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 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)

AMALGAMATED TRANSIT UNION - COPE

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6
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0
5
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0
5
6
0
8

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Paul Simon for Senate 30 West Washington Street Chicago, IL 60602	Re-election Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/14/84	\$ 500.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			\$ 500.00

1750 New York Avenue, N.W.
Washington, D.C. 20006

202/383-4800

Juel D. Drake
Chairman

Jake West
Secretary

James E. Cole
Treasurer

Michael J. Brennan
Political Director

FEC
C 0049727

AB: 15

RECEIVED
GENERAL COUNSEL
FEB 11 1986
AIO: 43



February 11, 1986

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

Dear Mr. Steele:

RE: MUR 2122

This is in response to your letter of January 31, 1986, received in this office on February 4, 1986, regarding the above-numbered complaint.

Enclosed is a copy of the FEC report covering the period of October 1, 1984 through October 17, 1984 showing that the Ironworkers Political Action League contributed \$4,800 to the Simon for Senate Committee for the candidate's primary deficit.

Also enclosed are copies of the FEC reports filed by our Local Union No. 103, Evansville, Indiana, PAC covering the periods January 1, 1984 through March 31, 1984 which shows a contribution to the Simon Committee in the amount of \$200 for the primary campaign; April 1, 1984 through June 30, 1984 which lists contributions of \$250 and \$100 to the Simon Committee for the primary campaign; and October 16, 1984 through December 31, 1984 which shows a refund of \$350 by the Simon for Senate Committee to Local Union No. 103 PAC.

With the refund of \$350, the Ironworkers Political Action League and the Local Union No. 103 PAC contributed a total of \$5,000 to the Simon for Senate Committee for the primary campaign.

I trust that the evidence enclosed with this letter will be accepted as proof that we are not in violation of certain sections of the Federal Election Campaign Act of 1971, as amended.

I am responding to your letter as I was elected Treasurer of the Ironworkers Political Action League on September 10, 1985, and the Commission was so notified on September 12, 1985.

I trust this will put an end to this matter.

Sincerely,

TREASURER

86040610564

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

86 FEB 14 8 09 15
ALIGN AREA

(Summary Page)

ALIGN AREA

1. Name of Committee (In Full)
Ironworkers Political Action League

Address (Number and Street)
**1750 New York Avenue, N.W.
Suite 400**

City, State and ZIP Code
Washington, D.C. 20006

Check here if address is different than previously reported.

2. FEC Identification Number
C00027359

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 _____
 Pre-General Election Report
 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 10/1/84 through 10/17/84

6. (a) Cash on hand January 1, 19 84

(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)		\$ 159,203.10
6(b)	\$ 206,968.38	
6(c)	\$ 7,413.46	\$ 196,336.72
6(d)	\$ 214,381.84	\$ 355,539.82
7	\$ 82,325.00	\$ 223,482.98
8	\$ 132,056.84	\$ 132,056.84
9	\$ -0-	
10	\$ -0-	

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

John T. Traylor
Type or Print Name of Treasurer


SIGNATURE OF TREASURER

10/24/84
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. § 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)

95040610565

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

Name of Committee (in Full)

Ironworkers Political Action League C00027359

Report Covering the Period:

From: 10/1/84 To: 10/17/84

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unitarized \$ 5,381.14)

(b) Political Party Committees

(c) Other Political Committees

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

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 11(d), 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 a(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 26(a), 26(b) and 26(c))

27. OTHER DISBURSEMENTS

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

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

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

30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)

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

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

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

**COLUMN A
Total This Period**

**COLUMN B
Calendar Year-To-Date**

\$ 5,806.14 \$163,452.01

-0- -0-

-0- -0-

5,806.14 163,452.01

1,607.32 18,698.96

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-0- -0-

-0- -0-

-0- 824.02

-0- 13,361.73

7,413.46 196,336.72

-0- 34,117.88

-0- -0-

75,300.00 170,465.10

-0- -0-

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7,025.00 18,900.00

82,325.00 223,482.98

5,806.14 163,452.01

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5,806.14 163,452.01

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ANY INFORMATION COPIED FROM THIS REPORT MAY NOT BE SOLD OR USED BY ANY PERSON FOR SOLICITING CONTRIBUTIONS OR FOR COMMERCIAL PURPOSES

IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

FULL NAME, MAILING ADDRESS, AND ZIP CODE	NAME OF EMPLOYER, OCCUPATION, AND AGGREGATE YEAR TO DATE	DATE	AMOUNT THIS PERIOD
CARROLL W. ALLISON 1750 NEW YORK AVENUE NW WASHINGTON DC 20006	IABSOIM LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
ROBERT F. ARRIC POST OFFICE BOX 990 PRYOR OK 74361	IABSOIM LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
GEORGE J. BANNISTER 96 DORSET DR KENMORE NY 14223	IABSOIM LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
MICHAEL J. BRENNAN 6130 RAMSHORN DR MC LEAN VA 22101	IABSOIM LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
LAWRENCE E. BURGESS 525 HILLSDALE DRIVE CHARLESTON WV 25302	IABSOIM LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
MARTIN BYRNE 145 NELSON STREET PROVIDENCE RI 02908	IABSOIM LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
JAMES E. COLE 1750 NEW YORK AVENUE NW WASHINGTON DC 20006	IABSOIM LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00

SUBTOTAL THIS PAGE..... \$70.00

85040610567

ANY INFORMATION COPIED FROM THIS REPORT MAY NOT BE SOLD OR USED BY ANY PERSON FOR SOLICITING CONTRIBUTIONS OR FOR COMMERCIAL PURPOSES

IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

FULL NAME, MAILING ADDRESS, AND ZIP CODE	NAME OF EMPLOYER, OCCUPATION, AND AGGREGATE YEAR TO DATE	DATE	AMOUNT THIS PERIOD
BILLY R. CONNER 1000 LANGSHAW DRIVE THONO FL 33592	IABSOIW LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
HENRY COOPER 2436 GORNO DRIVE TRENTON MI 48185	IABSOIW LABOR REPRESENTATIVE \$250.00	10/12/84 10/04/84	\$10.00 \$10.00
ALLAN D. CRAIG PO BOX 1524 FOND DU LAC WI 54935	IABSOIW LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
FRED W. DENNINGTON 2802 HOYTE DRIVE SHREVEPORT LA 71118	IABSOIW LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
JOSEPH P. DEVLIN BOX 165 CATASAUQUA PA 18032	IABSOIW LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
LEROY R. DIMITRI 3602 BRIARCLIFF COURT LOUISVILLE KY 40219	IABSOIW LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
MICHAEL A. FITZPATRICK 324 DOWNING BUFFALO NY 14220	IABSOIW LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
ERNIE E. FROST 504 NW WOODLAND KANSAS CITY MO 63011	IABSOIW LABOR REPRESENTATIVE \$287.00	10/12/84 10/04/84	\$7.00 \$7.00
SUBTOTAL THIS PAGE.....			\$94.00

86040510568

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IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

86040510569

FULL NAME, MAILING ADDRESS, AND ZIP CODE	NAME OF EMPLOYER, OCCUPATION, AND AGGREGATE YEAR TO DATE	DATE	AMOUNT THIS PERIOD
CARLOS GARCIA 640 OAKPATH DRIVE BALLWIN MO 63011	IABSOIM LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
RUSSELL P. HATCH 3027 FOREST DRIVE BALTIMORE MD 21234	LOCAL UNION # 016 IRON WORKER \$430.00	10/05/84	\$43.00
JOSEPH J. HUNT 1111 30TH ST NW WASHINGTON DC 20007	IABSOIM LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
CHARLES W. LANSFORD 18602 DEL RIO PLACE APT. #4 CERRITOS CA 90731	IABSOIM LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
DONALD G. LIGHTELL 918 HARRISON AVE SW CANTON OH 44708	IABSOIM LABOR REPRESENTATIVE \$410.00	10/12/84 10/04/84	\$10.00 \$10.00
JAMES A. MARTIN 3010 HATLEY DR AUSTIN TX 78746	IABSOIM LABOR REPRESENTATIVE \$305.00	10/12/84 10/04/84	\$5.00 \$5.00
JAMES E. MORAN 1750 NEW YORK AVENUE NW WASHINGTON DC 20036	IABSOIM LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00

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IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

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FULL NAME, MAILING ADDRESS, AND ZIP CODE	NAME OF EMPLOYER, OCCUPATION, AND AGGREGATE YEAR TO DATE	DATE	AMOUNT THIS PERIOD
MARVIN L. PLATT 312 GUARANTY LIFE BLDG JACKSONVILLE FL 32232	IABSOIM LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
BERNARD S. PUCHALSKI 3 N 418 JILL CT ELMHURST IL 60126	IABSOIM LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
WILLIAM L. PURDY 6090 CATAMA DRIVE GROVE CITY OH 43123	IABSOIM LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
JOHN G. SCIANDRA 10 DANIEL WEBSTER DR HUDSON NH 03051	IABSOIM LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
DESMOND R. SHANLEY 27 BOBIN ROAD RUMSON NJ 07760	IABSOIM LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
SAMUEL SPADEA 116 BELOIT AVENUE AUDUBON NJ 08106	IABSOIM LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
HARRY W. STROVEL 2754 WHITEFORD RD WHITEFORD MD 21150	LOCAL UNION # 016 IRON WORKER \$220.00	10/05/84	\$20.00
WILLIAM G. SZABRAK 3273 WEST 98TH STREET CLEVELAND OH 44102	IABSOIM LABOR REPRESENTATIVE \$322.00	10/12/84 10/04/84	\$5.00 \$5.00
SUBTOTAL THIS PAGE.....			\$95.00

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IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

FULL NAME, MAILING ADDRESS, AND ZIP CODE	NAME OF EMPLOYER, OCCUPATION, AND AGGREGATE YEAR TO DATE	DATE	AMOUNT THIS PERIOD
ROBERT S. THOMAS 10594 REEDS LANDING CIR BURKE VA 22015	IABSOIW LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
BOBBY B. THOMPSON 200 W WASHINGTON ST CHARLESTON WV 25302	LOCAL UNION # 301 IRON WORKER \$250.00	10/16/84	\$25.00
DENNIS R. TONEY 8163 MARINER TRAIL BALDWINVILLE NY	IABSOIW LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00
FRED I. WILLIAMS 253 BIRCH ROAD FAIRFIELD CT 06430	IABSOIW LABOR REPRESENTATIVE \$205.00	10/12/84 10/04/84	\$5.00 \$5.00

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SUBTOTAL THIS PAGE..... \$55.00

TOTAL THIS PERIOD..... \$425.00

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IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

FULL NAME, MAILING ADDRESS, AND ZIP CODE	NAME OF EMPLOYER, OCCUPATION, AND AGGREGATE YEAR TO DATE	DATE	AMOUNT THIS PERIOD
IRONWORKERS L.O. 401 PAC 1924 SPRING GARDEN ST PHILADELPHIA PA 19130	\$17,698.96	10/16/84	\$1,607.32

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SUBTOTAL THIS PAGE.....	\$1,607.32
TOTAL THIS PERIOD.....	\$1,607.32

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IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

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FULL NAME, MAILING ADDRESS, AND ZIP CODE	PURPOSE OF DISBURSEMENT		
	ELECTION TYPE	DATE	AMOUNT
PAT MULLOY FOR CONGRESS COMM 4006 DUTCHMANS LANE LOUISVILLE KY 40207	CONTRIBUTION-CONGRESSIONAL CANDIDATE 4TH CD KY GENERAL	10/01/84	\$500.00
TORRICELLI FOR CONGRESS COMM P O BOX 809 TEANECK NJ 07666	CONTRIBUTION-CONGRESSIONAL CANDIDATE 9TH CD NJ GENERAL	10/01/84	\$1,000.00
COMM TO RE-ELECT MORRISON 39 CHURCH STREET NEW HAVEN CT 06510	CONTRIBUTION-CONGRESSIONAL CANDIDATE 3RD CD CT GENERAL	10/01/84	\$1,000.00
MCMULTY FOR CONGRESS COMM P O BOX 30508 TUCSON AZ 85751	CONTRIBUTION-CONGRESSIONAL CANDIDATE 5TH CD AZ GENERAL	10/01/84	\$5,000.00
HANTON FOR CONGRESS 46-12 QUEENS BLVD SUITE 2018 SUNNYSIDE NY 11104	CONTRIBUTION-CONGRESSIONAL CA NDIDATE PRI DEFICIT 9TH CD NY PRIMARY	10/02/84	\$3,000.00
HANTON FOR CONGRESS 46-12 QUEENS BLVD SUITE 2018 SUNNYSIDE NY 11104	CONTRIBUTION-CONGRESSIONAL CANDIDATE 9TH CD NY GENERAL	10/02/84	\$2,000.00
FRIENDS OF CONG SIKORSKI 2003 NORTHDALÉ BOULEVARD COON RAPIDS MN 55433	CONTRIBUTION-CONGRESSIONAL CANDIDATE 6TH CD MN GENERAL	10/04/84	\$2,500.00
COMM TO RE-ELECT ST GERMAIN 42 MEYBOSSET STREET PROVIDENCE RI 02903	CONTRIBUTION-CONGRESSIONAL CANDIDATE 1ST CD RI GENERAL	10/04/84	\$500.00
SUBTOTAL THIS PAGE.....			\$15,500.00

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IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

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FULL NAME, MAILING ADDRESS, AND ZIP CODE	PURPOSE OF DISBURSEMENT ELECTION TYPE	DATE	AMOUNT
DASCHLE FOR CONGRESS COM BOX 1656 SIOUX FALLS SD 57101	CONTRIBUTION-CONGRESSIONAL CANDIDATE AT LARGE SD GENERAL	10/04/84	\$500.00
DYMALLY FOR CONGRESS COMMITTEE 322 W COMPTON BLVD SUITE 103 COMPTON CA 90220	CONTRIBUTION-CONGRESSIONAL CANDIDATE 31ST CD CA GENERAL	10/04/84	\$1,000.00
JIM HUNT COMMITTEE P O BOX 25937 RALEIGH NC 27611	CONTRIBUTION-SENATORIAL CANDIDATE NC GENERAL	10/04/84	\$5,000.00
HARELY STAGGERS JR FOR CONG P O BOX 1096 KEYSER WV 26726	CONTRIBUTION-CONGRESSIONAL CANDIDATE 2ND CD WV GENERAL	10/04/84	\$1,000.00
FRIENDS OF HARRY REID 6613 DENNY PLACE MCLEAN VA 22101	CONTRIBUTION-CONGRESSIONAL CANDIDATE 1ST CD VA GENERAL	10/04/84	\$1,000.00
COMM TO RE-ELECT CONG RANGEL 2030 ALLEN PLACE N W WASHINGTON DC 20009	CONTRIBUTION-CONGRESSIONAL CANDIDATE 16TH CD NY GENERAL	10/04/84	\$1,000.00
HOWARD FOR CONGRESS COMMITTEE 500 HIGHWAY 34 HATAWAN NJ 07747	CONTRIBUTION-CONGRESSIONAL CANDIDATE 3RD CD NJ GENERAL	10/04/84	\$500.00
COMM TO REELECT SENATOR PELL P O BOX 1984 PROVIDENCE RI 02903	CONTRIBUTION-SENATORIAL CANDIDATE RI GENERAL	10/04/84	\$500.00
SUBTOTAL THIS PAGE.....			\$10,500.00

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IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

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FULL NAME, MAILING ADDRESS, AND ZIP CODE	PURPOSE OF DISBURSEMENT	ELECTION TYPE	DATE	AMOUNT
JOHN FLANNERY FOR CONGRESS 3847 NORTH TAZEMELL STREET ARLINGTON VA 22207	CONTRIBUTION-CONGRESSIONAL CANDIDATE 10TH CD VA	GENERAL	10/04/84	\$1,300.00
FRIENDS OF DICK SASLAM P O BOX 1254 SPRINGFIELD VA 22151	CONTRIBUTION-CONGRESSIONAL CANDIDATE 8TH CD VA	GENERAL	10/04/84	\$1,300.00
FITZGERALD FOR CONGRESS P O BOX 584 FORT DODGE IA 50501	CONTRIBUTION-CONGRESSIONAL CANDIDATE 5TH CD IA	GENERAL	10/05/84	\$1,300.00
TOM STEWART FOR CONGRESS P O BOX 852 PETOSKEY MI 49770	CONTRIBUTION-CONGRESSIONAL CANDIDATE 11TH CD MI	GENERAL	10/05/84	\$500.00
GUARINI FOR CONGRESS P O BOX J-29 JERSEY CITY NJ 07306	CONTRIBUTION-CONGRESSIONAL CANDIDATE 14TH CD NJ	GENERAL	10/05/84	\$1,300.00
FRIENDS OF JIM OBERSTAR P O BOX 465 DULUTH MN 55802	CONTRIBUTION-CONGRESSIONAL CANDIDATE 8TH CD MN	GENERAL	10/05/84	\$1,300.00
GREENEBAUM FOR CONGRESS P O BOX 272 ARNOLD MD 21012	CONTRIBUTION-CONGRESSIONAL CANDIDATE 4TH CD MD	GENERAL	10/05/84	\$500.00
BARRY HOBBS FOR CONGRESS P O BOX 4118 STATION A PORTLAND ME 04101	CONTRIBUTION-CONGRESSIONAL CANDIDATE 1ST CD ME	GENERAL	10/05/84	\$500.00
SUBTOTAL THIS PAGE.....				\$6,500.00

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IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

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FULL NAME, MAILING ADDRESS, AND ZIP CODE	PURPOSE OF DISBURSEMENT	ELECTION TYPE	DATE	AMOUNT
FRIENDS OF JIM YOUNG 910 PEACH STREET ERIE PA 16501	CONTRIBUTION-CONGRESSIONAL CANDIDATE 21ST CD PA GENERAL		10/05/84	\$1,000.00
KENNELLY FOR CONGRESS COMM 4 NORTH MAIN STREET WEST HARTFORD CT 06107	CONTRIBUTION-CONGRESSIONAL CANDIDATE 1ST CD CT GENERAL		10/05/84	\$1,000.00
LLOYD DOGGETT CAMPAIGN FUND 406 WEST 13TH STREET AUSTIN TX 78701	CONTRIBUTION-SENATORIAL CANDIDATE TX GENERAL		10/05/84	\$3,500.00
LLOYD DOGGETT CAMPAIGN FUND 406 WEST 13TH STREET AUSTIN TX 78701	CONTRIBUTION-SENATORIAL CANDI- DATE PRI RUN-OFF DEFICIT TX PRIMARY		10/05/84	\$2,000.00
COMMITTEE TO ELECT JOE WELSH BOX 3040 DUBUQUE IA 52001	CONTRIBUTION-CONFRESSIONAL CANDIDATE 2ND CD IA GENERAL		10/05/84	\$500.00
SIMON FOR SENATE 30 WEST WASHINGTON SUITE 625 CHICAGO IL 60602	CONTRIBUTION-SENATORIAL CANDIDATE IL PRIMARY DEFICIT PRIMARY		10/09/84	\$4,500.00
CITIZENS FOR RODINO 22 CRESTMONT ROAD MOUNTCLAIR NJ 07042	CONTRIBUTION-CONGRESSIONAL CANDIDATE 10TH CD NJ GENERAL		10/09/84	\$1,000.00
CLAY CAMPAIGN COMMITTEE P O BOX 912 ST LOUIS MO 63118	CONTRIBUTION-CONGRESSIONAL CANDIDATE 1ST CD MO GENERAL		10/09/84	\$1,000.00
SUBTOTAL THIS PAGE.....				\$14,000.00

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IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

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FULL NAME, MAILING ADDRESS, AND ZIP CODE	PURPOSE OF DISBURSEMENT	ELECTION TYPE	DATE	AMOUNT
COMM TO ELECT MARIO BIAGGI 299 BROADWAY SUITE 1500 NEW YORK NY 10007	CONTRIBUTION-CONGRESSIONAL CANDIDATE 19TH CD NY	GENERAL	10/09/84	\$1,300.00
COMMITTEE FOR CONG ADDABBO 96-11 101ST AVENUE OZONE PARK NY 11416	CONTRIBUTION-CONGRESSIONAL CANDIDATE 6TH CD NY	GENERAL	10/09/84	\$1,300.00
FEIGHAN FOR CONGRESS COMMITTEE 15401 DETROIT AVENUE LAKEWOOD OH 44107	CONTRIBUTION-CONGRESSIONAL CANDIDATE 10TH CD OH	GENERAL	10/09/84	\$1,300.00
CITIZENS FOR DOWNEY P O BOX 91P BAY SHORE NY 11706	CONTRIBUTION-CONGRESSIONAL CANDIDATE 2ND CD NY	GENERAL	10/09/84	\$1,300.00
JAMES J FLORIO CAMPAIGN FUND P O BOX 145 SOMERDALE NJ 08083	CONTRIBUTION-CONGRESSIONAL CANDIDATE 1ST CD NJ	GENERAL	10/09/84	\$1,300.00
GEJDENSON FOR CONGRESS P O BOX 1984 BOZRAH CT 06334	CONTRIBUTION-CONGRESSIONAL CANDIDATE 2ND CD CT	GENERAL	10/09/84	\$1,300.00
TOWNS 84 321 STUYVESSANT AVENUE BROOKLYN NY 11233	CONTRIBUTION-CONGRESSIONAL CANDIDATE 11TH CD NY	GENERAL	10/09/84	\$1,000.00
MIKE BARNES FOR CONGRESS 154 CONGRESSIONAL LANE SUITE F ROCKVILLE MD 20852	CONTRIBUTION-CONGRESSIONAL CANDIDATE 8TH CD MD	GENERAL	10/09/84	\$1,300.00
SUBTOTAL THIS PAGE.....				\$8,000.00

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IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

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FULL NAME, MAILING ADDRESS, AND ZIP CODE	PURPOSE OF DISBURSEMENT	ELECTION TYPE	DATE	AMOUNT
COMM TO ELECT CONG DWENS 1129 EASTERN PARKWAY BROOKLYN NY 11213	CONTRIBUTION-CONGRESSIONAL CANDIDATE 12TH CD NY	GENERAL	10/09/84	\$500.00
THE CITIZENS FOR CONVERS 614 LAFAYETTE BUILDING DETROIT MI 48226	CONTRIBUTION-CONGRESSIONAL CANDIDATE 1ST CD MI	GENERAL	10/09/84	\$500.00
ACKERMAN FOR CONGRESS P O BOX 95 FRESH MEADOWS NY 11365	CONTRIBUTION-CONGRESSIONAL CANDIDATE 7TH CD NY	GENERAL	10/09/84	\$1,000.00
SLOAN FOR CONGRESS 1875 MORRIS ROAD COLUMBUS OH 43229	CONTRIBUTION-CONGRESSIONAL CANDIDATE 12TH CD OH	GENERAL	10/11/84	\$500.00
COMM TO ELECT CONG GARCIA P O BOX 1571 BRONX NY 10451	CONTRIBUTION-CONGRESSIONAL CANDIDATE 18TH CD NY	GENERAL	10/10/84	\$1,000.00
COMM TO ELECT CONG SCHUMER 1551 EAST 23RD STREET BROOKLYN NY 11210	CONTRIBUTION-CONGRESSIONAL CANDIDATE 10TH CD NY	GENERAL	10/11/84	\$500.00
JACK REARDON FOR CONGRESS COMM 751 MINNISOTA AVENUE KANSAS CITY KS 66101	CONTRIBUTION-CONGRESSIONAL CANDIDATE 3RD CD KS	GENERAL	10/11/84	\$1,000.00
HOCHBRUECKNER FOR CONGRESS 1 MYCOMB PLACE CORAM NY 11727	CONTRIBUTION-CONGRESSIONAL CANDIDATE 1ST CD NY	GENERAL	10/11/84	\$1,000.00
SUBTOTAL THIS PAGE.....6.....				\$6,000.00

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IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

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FULL NAME, MAILING ADDRESS, AND ZIP CODE	PURPOSE OF DISBURSEMENT		
	ELECTION TYPE	DATE	AMOUNT
STAN LUNDINE FOR CONGRESS COMM P O BOX 674 JAMESTOWN NY 14702	CONTRIBUTION-CONGRESSIONAL CANDIDATE 34TH CD NY GENERAL	10/15/84	\$1,300.00
KULP FOR CONGRESS COMMITTEE 114 BRIDGE STREET HIFFLINTOWN PA 17059	CONTRIBUTION-CONGRESSIONAL CANDIDATE 9TH CD PA GENERAL	10/16/84	\$500.00
HEDDEN FOR CONGRESS 1984 GREENWOOD AVENUE TRENTON NJ 08609	CONTRIBUTION-CONGRESSIONAL CANDIDATE 4TH CD NJ GENERAL	10/16/84	\$1,300.00
RETURN BROWN TO CONGRESS COMM P O BOX 1421 RIVERSIDE CA 92502	CONTRIBUTION-CONGRESSIONAL CANDIDATE 36TH CD CA GENERAL	10/16/84	\$1,300.00
WINTER FOR SENATE P O BOX 23148 JACKSON MS 39225	CONTRIBUTION-SENATORIAL CANDIDATE MS GENERAL	10/16/84	\$1,300.00
BILL BRADLEY FOR U S SENATE P O BOX 1984 UNION NJ 07083	CONTRIBUTION-SENATORIAL CANDIDATE NJ GENERAL	10/16/84	\$1,300.00
RATCHFORD FOR CONGRESS P O BOX 334 DANBURY CT 06810	CONTRIBUTION-CONGRESSIONAL CANDIDATE 5TH CD CT GENERAL	10/16/84	\$500.00
CITIZENS FOR HARKIN BOX 811 DES MOINES IA 50315	CONTRIBUTION-SENATORIAL CANDIDATE IA GENERAL	10/16/84	\$1,300.00
SUBTOTAL THIS PAGE.....			\$7,300.00

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IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

FULL NAME, MAILING ADDRESS, AND ZIP CODE	PURPOSE OF DISBURSEMENT			AMOUNT
	ELECTION TYPE	DATE		
WALGREN FOR CONGRESS COMMITTEE 4140 BROWNSVILLE RD ROOM 100 PITTSBURGH PA 15227	CONTRIBUTION-CONGRESSIONAL CANDIDATE 18TH CD PA GENERAL	10/16/84		\$500.00
FRIENDS OF CONG PATTERSON P O BOX 11605 SANTA ANA CA 92711	CONTRIBUTION-CONGRESSIONAL CANDIDATE 38TH CD CA GENERAL	10/16/84		\$1,000.00
YOUNG FOR CONGRESS P O BOX 66 ST ANN MO 63074	CONTRIBUTION-CONGRESSIONAL CANDIDATE 2ND CD MO GENERAL	10/16/84		\$1,000.00
BILL BLUE FOR CONGRESS P O BOX 1326 SIKESTON MO 63801	CONTRIBUTION-CONGRESSIONAL CANDIDATE 8TH CD MO GENERAL	10/16/84		\$500.00
HUGH B MCFADDEN FOR CONGRESS 242 WEST 14TH STREET CASPER WY 82601	CONTRIBUTION-CONGRESSIONAL CANDIDATE AT LARGE WY GENERAL	10/17/84		\$1,000.00
VOLKMER FOR CONG CAMPAIGN COMM P O BOX 991 HANNIBAL MO 63401	CONTRIBUTION-CONGRESSIONAL CANDIDATE 9TH CD MO GENERAL	10/17/84		\$500.00
FRIENDS OF SENATOR CARL LEVIN 15565 NORTHLAND DRIVE SOUTHFIELD MI 48075	CONTRIBUTION-SENATORIAL CANDIDATE MI GENERAL	10/17/84		\$1,000.00
LLOYD DOGGETT CAMPAIGN FUND 406 WEST 13TH STREET AUSTIN TX 78701	CONTRIBUTION-SENATORIAL CANDI- DATE PRI RUN-OFF DEFICIT TX PRIMARY	10/17/84		\$1,000.00
SUBTOTAL THIS PAGE.....				\$6,500.00

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IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

FULL NAME, MAILING ADDRESS, AND ZIP CODE	PURPOSE OF DISBURSEMENT		AMOUNT
	ELECTION TYPE	DATE	
WACHOB FOR CONGRESS 84 COMM P O BOX 53 JOHNSONBURG PA 15045	CONTRIBUTION-CONGRESSIONAL CANDIDATE 34RD CD PA GENERAL	10/17/84	\$500.00

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SUBTOTAL THIS PAGE..... \$500.00

TOTAL THIS PERIOD..... \$75,300.00

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IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

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FULL NAME, MAILING ADDRESS, AND ZIP CODE	PURPOSE OF DISBURSEMENT	ELECTION TYPE	DATE	AMOUNT
DEMOCRATIC STATE SENATE COMM P O BOX 3792 HARRISBURG PA 17104	CONTRIBUTION-DEMOCRATIC STATE SENATE CAMPAIGN COMMITTEE PA GENERAL		10/01/84	\$125.00
SOLOMON FOR GOVERNOR 209 HANTON AVENUE PROVIDENCE RI 02902	CONTRIBUTION-GUBERNATORIAL CANDIDATE RI GENERAL		10/04/84	\$500.00
BURCH FOR STATE SENATE COMM 128 W BROADWAY NEW PHILA OH 44663	CONTRIBUTION-SENATORIAL CANDIDATE 30TH DISTRICT OH GENERAL		10/05/84	\$500.00
SUFFOLK COUNTY DEMOCRATIC COMM 1021 VETERANS HIGHWAY HAUPPAGE NY 11788	CONTRIBUTION-SUFFOLK COUNTY DEMOCRATIC COMMITTEE NY GENERAL		10/09/84	\$500.00
FRIENDS OF KEN ROTHMAN 222 SOUTH CENTRAL AVENUE CLAYTON MO 63105	CONTRIBUTION-GUBERNATORIAL CANDIDATE MO GENERAL		10/11/84	\$1,300.00
PEOPLE FOR BOOTH GARDNER 401 PONTIUS AVENUE NORTH SEATTLE WA 98109	CONTRIBUTION-GUBERNATORIAL CANDIDATE WA GENERAL		10/16/84	\$500.00
RE-ELECT SENATOR ANDREZESKI 713 WEST 10TH STREET ERIE PA 16502	CONTRIBUTION-CANDIDATE FOR STATE SENATE 49TH DISTRICT PA GENERAL		10/16/84	\$500.00
VILLA FOR TREASURER 3847 HOLLY HILLS ST LOUIS MO 63116	CONTRIBUTION-CANDIDATE STATE TREASURER MO GENERAL		10/17/84	\$500.00
SUBTOTAL THIS PAGE.....				\$4,125.00

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IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

FULL NAME, MAILING ADDRESS, AND ZIP CODE	PURPOSE OF DISBURSEMENT	ELECTION TYPE	DATE	AMOUNT
FRIENDS OF JIM MURPHY 2742 UPTON ST LOUIS MO 63116	CONTRIBUTION-CANDIDATE STATE SENATOR MO	GENERAL	10/17/84	\$300.00
GROSS FOR SENATE 11111 STONY VIEW LANE ST LOUIS MO 63126	CONTRIBUTION-CANDIDATE STATE SENATOR 7TH DISTRICT MO	GENERAL	10/17/84	\$300.00
CITIZENS FOR BUD HOFF 1210 MICHELLE DRIVE ST CLAIR MO 63077	CONTRIBUTION-CANDIDATE STATE SENATOR 23RD DISTRICT MO	GENERAL	10/17/84	\$300.00
MARY JADIKER FOR ASSEMBLY 865 THIRD STREET SANTA ROSA CA 95404	CONTRIBUTION-CANDIDATE STATE ASSEMBLY 8TH DISTRICT CA	GENERAL	10/17/84	\$1,000.00
DELUCA FOR LEGISLATOR COMM 624 IDAHO AVENUE VERONA PA 15147	CONTRIBUTION-CANDIDATE STATE LEGISLATOR 32ND DISTRICT PA	GENERAL	10/17/84	\$1,000.00

SUBTOTAL THIS PAGE..... \$2,900.00
TOTAL THIS PERIOD..... \$7,025.00

86040610583

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

FEDERAL ELECTION COMMISSION
 86 FEB 14 8:15

(Summary Page)

ALIGN AREA ALIGN 1. Name of Committee (In Full) IRON WORKERS LOCAL # 103 POLITICAL ACTION LEAGUE <hr/> Address (Number and Street) 5313 OLD BOONVILLE HWY City, State and ZIP Code EVANSVILLE, IN 47715 <input type="checkbox"/> Check here if address is different than previously reported.	4. TYPE OF REPORT (Check appropriate boxes) (a) <input checked="" type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non-Election Year Only) <input 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 (b) Is this Report an Amendment? <input type="checkbox"/> YES <input type="checkbox"/> NO
2. FEC Identification Number C00143545	
3. <input checked="" type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on <u>1-1-84</u> (Date)	

06040584

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>1-1-84</u> through <u>3-31-84</u>		
6. (a) Cash on hand January 1, 19 <u>84</u>		\$ 1,869.00
(b) Cash on Hand at Beginning of Reporting Period	\$ 1,869.00	
(c) Total Receipts (from Line 18)	\$ 410.00	\$ 410.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 2,279.00	\$ 2,279.00
7. Total Disbursements (from Line 28)	\$ 200.00	\$ 200.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 2,079.00	\$ 2,079.00
9. Debts and Obligations Owed TO The Committee	\$ 0	
(Itemize all on Schedule C or Schedule D)		
10. Debts and Obligations Owed BY the Committee	\$ 0	
(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.

JAMES L. MAHONEY
 Type or Print Name of Treasurer
James L. Mahoney
 SIGNATURE OF TREASURER 4-1-84
 Date

For further information contact:
 Federal Election Commission
 Toll Free 800-424-9630
 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. § 437g.

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

	FEC FORM 3X (3/80)
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	

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

RECEIVED AT THE FEC
06 FEB 14 8:15

SCHEDULE B

(Summary Page)

<p>ALIGN AREA</p> <p>1. Name of Committee (In Full) <u>IRONWORKERS LOCAL # 103</u> <u>POLITICAL ACTION LEAGUE</u></p> <p>Address (Number and Street) <u>5313 OLD BOONVILLE HWY</u></p> <p>City, State and ZIP Code <u>EVANSVILLE IN 47715</u></p> <p><input type="checkbox"/> Check here if address is different than previously reported.</p> <p>2. FEC Identification Number <u>C00143545</u></p> <p>3. <input checked="" type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on <u>1-1-84</u> (Date)</p>	<p>ALIGN AREA</p> <p>4. TYPE OF REPORT (Check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report</p> <p><input checked="" type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report</p> <p><input type="checkbox"/> July 31 Mid Year Report (Non-Election Year Only)</p> <p><input type="checkbox"/> Monthly Report for _____</p> <p><input type="checkbox"/> Twelfth day report preceding _____ (Type of Election)</p> <p>election on _____ in the State of _____</p> <p><input type="checkbox"/> Thirtieth day report following the General Election</p> <p>on _____ in the State of _____</p> <p><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>4-1-84</u> through <u>6-30-84</u>		
6. (a) Cash on hand January 1, 19 <u>84</u>		\$ 1869.00
(b) Cash on Hand at Beginning of Reporting Period	\$ 2,079.00	
(c) Total Receipts (from Line 18)	\$ 1,012.00	\$ 1422.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 3,091.00	\$ 3291.00
7. Total Disbursements (from Line 28)	\$ 2,350.00	\$ 2550.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 741.00	\$ 741.00
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.

JAMES L. MAHONEY
Type or Print Name of Treasurer

James L. Mahoney
SIGNATURE OF TREASURER

7-9-84
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.

86040610587

SCHEDULE B

ITEMIZED DISBURSEMENTS

IRONWORKERS LOCAL # 103 POLITICAL ACTION LEAGUE

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) as shown FROM:

IRONWORKERS LOCAL # 103 POLITICAL ACTION LEAGUE

8
5
0
4
0
5
1
0
5
8

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
KY. SENATORIAL PRIMARY FRIENDS FOR DEE HUPPLESTON, COMM. 324 FREDERICK OWENSBORO, KY. 42301	CAMPAIGN CONTRIBUTION Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5-2-84	1,000.00
INDIANA CONGRESSIONAL McCLOSKEY FOR 8TH DISTRICT COMM. P.O. BOX 7015 RECEIVED BLOOMINGTON, IN. 47401	CAMPAIGN CONTRIBUTION Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5-2-84	500.00
ILLINOIS SENATORIAL SIMON FOR SENATE COMM. 30 WEST WASHINGTON CHICAGO, ILL 60602	CAMPAIGN CONTRIBUTION Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): DINNER TICKETS	5-2-84 5-17-84	250.00 100.00
ILLINOIS CONGRESSIONAL BRUCE FOR CONGRESS COMM. P.O. BOX 206 OLNEY, IL. 62450	CAMPAIGN CONTRIBUTION Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5-2-84	250.00
ILLINOIS CONGRESSIONAL KEN GRAY FOR CONGRESS COMM. 1011 W. MAIN ST. WEST FRANKFORT, IL. 62896	CAMPAIGN CONTRIBUTION Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5-2-84	250.00
F. Full Name, Mailing Address and ZIP Code (see E) DISBURSEMENTS MADE BY PARTY OR MADE BY PARTY OR	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)			2350.00

DETAILED SUMMARY PAGE STATEMENT
 For a Period of Receipts and Disbursements of a Committee
 (Page 2, FEC FORM 3X)

Name of Committee (in Full) **IRONWORKERS LOCAL #103 POLITICAL ACTION LEAGUE** (Signature Line)
 Report Covering the Period: From: **4-1-84** To: **6-30-84**

	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.	1012.00	1422.00
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	1012.00	1422.00
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		
17. OTHER RECEIPTS (Dividends, Interest, etc.)		
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	1012.00	1422.00
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES		
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	2350.00	2550.00
22. INDEPENDENT EXPENDITURES (use Schedule E)		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(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 26(a), 26(b) and 26(c))		
27. OTHER DISBURSEMENTS		
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	2350.00	2550.00
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	1012.00	1422.00
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)		
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	1012.00	1422.00
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)		

85040510589

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ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

TECHNICAL WORKERS LOCAL # 103
POLITICAL ACTION LEAGUE

Address (Number and Street)

5313 OLD BOONVILLE HWY

City, State and ZIP Code

EVANSVILLE, IN 47715

Check here if address is different than previously reported.

2. FEC Identification Number

C00143545

3. This committee qualified as a multicandidate committee during this Reporting Period on 1-1-84

(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 _____ in the State of _____
- Termination Report

(b) Is this Report an Amendment?

YES NO

SUMMARY

5. Covering Period 10-16-84 through 12-31-84

6. (a) Cash on hand January 1, 1984

(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)

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

JAMES L. MAHONEY
Type or Print Name of Treasurer

James L. Mahoney
SIGNATURE OF TREASURER

1-16-85
Date

For further information contact:

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

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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 A

ITEMIZED RECEIPTS

Page 1 of 7 for
LINE NUMBER 12
 (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)			
T. ROBINSON'S LOCAL # 103 P.A.L.			
A. Full Name, Mailing Address and ZIP Code KY STATE POLITICAL ACTION LEAGUE TERMINATION	Name of Employer Occupation	Date (month, day, year) 12-31-84	Amount of Each Receipt this Period 2637.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): TRANSFER TO FEDERAL P.A.L.	Aggregate Year-to-Date-\$		
B. Full Name, Mailing Address and ZIP Code IL STATE POLITICAL ACTION LEAGUE TERMINATION	Name of Employer Occupation	Date (month, day, year) 12-31-84	Amount of Each Receipt This Period 568.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): TRANSFER TO FEDERAL P.A.L.	Aggregate Year-to-Date-\$		
C. Full Name, Mailing Address and ZIP Code SIMON FOR SENATE COMM. 20 W. WASHINGTON CHICAGO, IL 60602	Name of Employer DAVIS Occupation	Date (month, day, year) 12-11-84	Amount of Each Receipt This Period 350.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): REFUND	Aggregate Year-to-Date-\$		
D. Full Name, Mailing Address and ZIP Code - -	Name of Employer Occupation	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):	Aggregate Year-to-Date-\$		
E. Full Name, Mailing Address and ZIP Code EXPENDITURES MADE BY PARTY COMMITTEE	Name of Employer ETS. Occupation	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):	Aggregate Year-to-Date-\$		
F. Full Name, Mailing Address and ZIP Code SOLUTIONS INC.	Name of Employer Occupation	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):	Aggregate Year-to-Date-\$		
G. Full Name, Mailing Address and ZIP Code DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25)	Name of Employer Occupation	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):	Aggregate Year-to-Date-\$		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			3535.00

SCHEDULE B

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

Name of Committee (in Full)		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				11(a)
(Memo Entry Unitemized \$ 250.00)		250.00	4518.00	
(b) Political Party Committees				11(b)
(c) Other Political Committees				11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))		250.00	4518.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		3205.00	3205.00	12
13. ALL LOANS RECEIVED				13
14. LOAN REPAYMENTS RECEIVED				14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)				15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		350.00	350.00	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)				17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)		3805.00		18
II. DISBURSEMENTS				
19. OPERATING EXPENDITURES		225.00	225.00	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES				20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		250.00	6000.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)				22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 et al) (Use Schedule F)				23
24. LOAN REPAYMENTS MADE				24
25. LOANS MADE				25
26. REFUNDS OF CONTRIBUTIONS TO				
(a) Individuals/Persons Other Than Political Committees				26(a)
(b) Political Party Committees				26(b)
(c) Other Political Committees				26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))				26(d)
27. OTHER DISBURSEMENTS				27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		475.00	6225.00	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES				
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)		250.00	4518.00	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)				30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)		250.00	4518.00	31
32. TOTAL OPERATING EXPENDITURES from Line 19		225.00	225.00	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15				33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)		225.00	225.00	34

SCHEDULE B

ITEMIZED DISBURSEMENTS
 (Summary Page)

4 TYPE OF REPORT (Check one)

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) IRONWORKERS LOCAL # 103 POLITICAL ACTION LEAGUE

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<u>PERKINS FOR CONGRESS</u> <u>P.O. BOX 509</u> <u>HINDRIAN, KY 41822</u>	Campaign Cont. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<u>10-16-84</u>	<u>250.00</u>
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	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) 250.00

95040510593

International Association
of
Bridge, Structural and Ornamental Iron Workers

Local No. 103
Affiliated with A.F.L.-C.I.O.
PHONE 477-8317

5313 Old Boonville Highway - Evansville, Indiana 47715

RECEIVED AT THE FEC
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86 FEB 11 P 4: 26

February 6, 1986

Federal Election Commission
Washington D.C. 20463
attn: Frances B Hagan

Dear Ms. Hagan:

In regards to the complaint filed by Jeff W Ryan concerning the over-contribution in behalf of Senator Paul Simon of Illinois involving Iron Workers Local #103 and its International. We wish to have the complaint withdrawn after you have reviewed the following information.

1.) F.E.C. report dated 4-1-84 covering period 1-1-84 through 3-31-84 shows a contribution of \$200.00 to Simon for Senate Committee on 3-7-84 for his primary campaign.

2.) F.E.C. report dated 7-9-84 covering period 4-1-84 through 6-30-84 shows a contribution of \$250.00 on 5-2-84 and the purchase of dinner tickets for \$100.00 on 5-17-84. Both contributions were for Mr Simons primary campaign.

3.) F.E.C. report dated 10-15-84 covering period 7-1-84 through 10-15-84 shows no contributions to Mr Simons committee.

4.) F.E.C. report dated 1-10-85 covering period 10-16-84 through 12-31-84 clearly shows a refund to I.W.Local #103 P.A.L. on 12-11-84 for \$350.00 from the Simon for Senate Committee.

I am also including a copy of these previously filed reports from our Political Action Committee.

Other facts that could be taken into consideration are that in October of 1984 our P.A.L. Committee voted to donate \$1000.00 additional to the Simon for Senate Committee, but were informed by his campaign office that total contributions

8 5 0 4 0 5 1 0 5 9 4

International Association
of
Bridge, Structural and Ornamental Iron Workers

Local No. 103

Affiliated with A.F.L.-C.I.O.
PHONE 477-5317

5313 Old Boonville Highway - Evansville, Indiana 47715

-2-

of \$5000.00 by Affiliated Ironworkers had been exceeded and that we could expect a refund, which was sent in December 1984. Enclosed find copy of letter dated 10-16-84 sent to the International P.A.L. Director Mickey Brennan, which on page 2 states this. There is a mistake in the letter, it should read \$550.00, instead of \$450.00. Either I made a mistake in addition or the secretary hit the wrong key, but it was not intentional.

Also enclosed is copy of Bank Deposit of 12-11-84 showing that the \$350.00 from Simon for Senate Committee was received and deposited.

I hope these facts will be taken into consideration by the members of the Commission and that no action be taken in regards to our participation in the complaint as we think it is in error.

Sincerely yours,

James L. Mahoney

James L Mahoney
Treasurer
Iron Workers Local #103
Political Action League

Please consider the above Facts, Documents, and Statements to be honest and truthful to the best of my knowledge regarding this complaint and sworn to by my signature.

86040610595

(Summary Page)

86 FEB 11 11 41 AM '84

ALISA AREA

1. Name of Committee (In Full)

TECHNICAL WORKERS LOCAL #103
NATIONAL ACTION LEAGUE

Address (Number and Street)

1313 OLD BOONVILLE HWY

City, State and ZIP Code

EVANSVILLE, IN 47715

Check here if address is different than previously reported.

2. FEC Identification Number

C00143545

3. This committee qualified as a multicandidate committee during this Reporting Period on 1-1-84 (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 _____ in the State of _____
- Termination Report

(b) Is this Report an Amendment?

YES NO

SUMMARY

5. Covering Period 10-16-84 through 12-31-84

6. (a) Cash on hand January 1, 1984

(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)		\$ 1369.00
6(b)	\$ 387.00	
6(c)	\$ 3805.00	\$ 8073.00
6(d)	\$ 4192.00	\$ 9942.00
7	\$ 475.00	\$ 6225.00
8	\$ 3717.00	\$ 3717.00
9	\$ 0	
10	\$ 0	

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

JAMES L. MAHONEY
Type or Print Name of Treasurer

James L. Mahoney
SIGNATURE OF TREASURER

1-16-85
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)

86040310596

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)

TECHNICIANS LOCAL # 103 P.A.L.

A. Full Name, Mailing Address and ZIP Code <i>NY. STATE POLITICAL ACTION LEAGUE TERMINATION</i>	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation	<i>12-31-84</i>	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <i>TRANSFER TO FEDERAL P.A.L.</i>	Aggregate Year-to-Date-\$		<i>2637.00</i>

B. Full Name, Mailing Address and ZIP Code <i>IL. STATE POLITICAL ACTION LEAGUE TERMINATION</i>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	<i>12-31-84</i>	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <i>TRANSFER TO FEDERAL P.A.L.</i>	Aggregate Year-to-Date-\$		<i>568.00</i>

C. Full Name, Mailing Address and ZIP Code <i>SIMON FOR SENATE COMM. 10 W. WASHINGTON CHICAGO, IL. 60602</i>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	<i>12-11-84</i>	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <i>REFUND</i>	Aggregate Year-to-Date-\$		<i>350.00</i>

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) *3535.00*

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

Name of Committee (in Full)

Period 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	250.00	4518.00	11(a)
(b) Political Party Committees			11(b)
(c) Other Political Committees			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	250.00	4518.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	3205.00	3205.00	12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES	350.00	350.00	16
AND OTHER POLITICAL COMMITTEES			
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	3805.00		18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	225.00	225.00	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND	250.00	6000.00	21
OTHER POLITICAL COMMITTEES			
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES			23
(2 U.S.C. § 441 a(d)) (Use Schedule F)			
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	475.00	6225.00	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	250.00	4518.00	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	250.00	4518.00	31
32. TOTAL OPERATING EXPENDITURES from Line 19	225.00	225.00	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	225.00	225.00	34

8
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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)
IRONWORKERS LOCAL # 103 POLITICAL ACTION LEAGUE

86040510599

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
FERRINS FOR CONGRESS P.O. BOX 509 HINDMAN, KY 41822	CAMPAIGN CONT. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-16-84	250.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only) 250.00

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

IRONWORKERS LOCAL # 103
POLITICAL ACTION LEAGUE

Address (Number and Street)

5313 OLD BOONVILLE HWY

City, State and ZIP Code

EVANSVILLE, IN 47715

Check here if address is different than previously reported.

2. FEC Identification Number

C00143545

3. This committee qualified as a multicandidate committee during this Reporting Period on 1-1-84 (Date)

4. TYPE OF REPORT (Check appropriate box)

- (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 _____ in the State of _____
- Termination Report

(b) Is this Report an Amendment?
 YES NO

SUMMARY

5. Covering Period 7-1-84 through 10-15-84

6. (a) Cash on hand January 1, 1984 \$ 1869.00

(b) Cash on Hand at Beginning of Reporting Period \$ 741.00

(c) Total Receipts (from Line 18) \$ 2846.00 \$ 4268.00

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) \$ 3587.00 \$ 6137.00

7. Total Disbursements (from Line 28) \$ 3200.00 \$ 5750.00

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) \$ 387.00 \$ 387.00 ✓

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.

JAMES L. MAHONEY
Type or Print Name of Treasurer

JAMES L. MAHONEY
SIGNATURE OF TREASURER

10-15-84
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)

Name of Committee (in Full)

IRONWORKERS LOCAL # 103 P.A.L.

Report Covering the Period

From: 7-1-84

To: 10-15-84

	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>2846.00</u>	<u>4268.00</u>	11(a)
(b) Political Party Committees			11(b)
(c) Other Political Committees			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	<u>2846.00</u>	<u>4268.00</u>	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES			16
AND OTHER POLITICAL COMMITTEES			
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
<u>18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)</u>	<u>2846.00</u>	<u>4268.00</u>	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES			19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
<u>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND</u>	<u>3200.00</u>	<u>5750.00</u>	21
OTHER POLITICAL COMMITTEES			
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES			23
(2 U.S.C. § 441 a(d)) (Use Schedule F)			
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
<u>28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)</u>	<u>3200.00</u>	<u>5750.00</u>	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	<u>2846.00</u>	<u>4268.00</u>	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	<u>2846.00</u>	<u>4268.00</u>	31
32. TOTAL OPERATING EXPENDITURES from Line 19			32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
<u>34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)</u>	<u>0</u>	<u>0</u>	34

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)

IRONWORKERS LOCAL # 103 POLITICAL ACTION LEAGUE

85040510604

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
KY. SENATORIAL PRIMARY FRIENDS FOR DEE HUDDLESTON COMM. 324 FREDERICKA OWENSBORO, KY. 42301	CAMPAIGN CONTRIBUTION Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5-2-84	1,000.00
B. Full Name, Mailing Address and ZIP Code INDIANA CONGRESSIONAL McCLOSKEY FOR 8TH DISTRICT COMM. P.O. BOX 70 BLOOMINGTON, IN. 47401	CAMPAIGN CONTRIBUTION Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5-2-84	500.00
C. Full Name, Mailing Address and ZIP Code ILLINOIS SENATORIAL SIMON FOR SENATE COMM. 30 WEST WASHINGTON CHICAGO, ILL 60602	CAMPAIGN CONTRIBUTION Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): DINNER TICKETS	5-2-84 5-17-84	250.00 100.00
D. Full Name, Mailing Address and ZIP Code ILLINOIS CONGRESSIONAL BRUCE FOR CONGRESS COMM. P.O. BOX 206 CLNEY IL. 62450	CAMPAIGN CONTRIBUTION Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5-2-84	250.00
E. Full Name, Mailing Address and ZIP Code ILLINOIS CONGRESSIONAL KEN GRAY FOR CONGRESS COMM. 1011 W. MAIN ST. WEST FRANKFORT, IL. 62896	CAMPAIGN CONTRIBUTION Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5-2-84	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)			2350.00

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

Name of Committee (in Full)

IRONWORKERS LOCAL #103 POLITICAL ACTION LEAGUE

Report Covering the Period

From: **4-1-84** To: **6-30-84**

**COLUMN A
Total This Period**

**COLUMN B
Calendar Year-To-Date**

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unitemized \$ 1012.00)

(b) Political Party Committees

(c) Other Political Committees

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

1012.00 **1422.00**

11(a)

11(b)

11(c)

11(d)

1012.00 **1422.00**

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

12

13. ALL LOANS RECEIVED

13

14. LOAN REPAYMENTS RECEIVED

14

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

15

16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES

16

AND OTHER POLITICAL COMMITTEES

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

17

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

1012.00 **1422.00**

18

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

19

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

20

**21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND
OTHER POLITICAL COMMITTEES**

2350.00 **2550.00**

21

22. INDEPENDENT EXPENDITURES (use Schedule E)

22

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES

23

(2 U.S.C. § 441 a(d)) (Use Schedule F)

24. LOAN REPAYMENTS MADE

24

25. LOANS MADE

25

26. REFUNDS OF CONTRIBUTIONS TO

(a) Individuals/Persons Other Than Political Committees

26(a)

(b) Political Party Committees

26(b)

(c) Other Political Committees

26(c)

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

26(d)

27. OTHER DISBURSEMENTS

27

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

2350.00 **2550.00**

28

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

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

1012.00 **1422.00**

29

30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)

30

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

1012.00 **1422.00**

31

32. TOTAL OPERATING EXPENDITURES from Line 19

32

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

33

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

34

86040510605

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

RECEIVED BY THE FEC

(Summary Page)

ALIGN AREA

86 FEB 11 P ALIGN AREA

1. Name of Committee (In Full)
IRON WORKERS LOCAL # 103
POLITICAL ACTION LEAGUE

Address (Number and Street)
5313 OLD BOONVILLE HWY

City, State and ZIP Code
EVANSVILLE, IN. 47715

Check here if address is different than previously reported.

2. FEC Identification Number
C00143545

3. This committee qualified as a multicandidate committee during this Reporting Period on 1-1-84 (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 _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

86040510606

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>1-1-84</u> through <u>3-31-84</u>		
6. (a) Cash on hand January 1, 19 <u>84</u>			\$ 1,869.00
(b) Cash on Hand at Beginning of Reporting Period		\$ 1,869.00	
(c) Total Receipts (from Line 18)		\$ 410.00	\$ 410.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 2,279.00	\$ 2,279.00
7. Total Disbursements (from Line 28)		\$ 200.00	\$ 200.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 2,079.00	\$ 2,079.00
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.

JAMES L. MAHONEY
Type or Print Name of Treasurer

James L. Mahoney
SIGNATURE OF TREASURER

4-1-84
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.

										FEC FORM 3X (3/80)
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34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32) 34

Name of Committee (in Full)

IRONWORKERS LOCAL # 103 POLITICAL ACTION LEAGUE

Report Covering the Period:

From: **1-1-84**

To: **3-31-84**

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees (Memo Entry Unitemized \$ <u>410.00</u>)	410.00	410.00	11(a)
(b) Political Party Committees			11(b)
(c) Other Political Committees			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))			11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	410.00	410.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES			19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	200.00	200.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	200.00	200.00	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	410.00	410.00	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	410.00	410.00	31
32. TOTAL OPERATING EXPENDITURES from Line 19			32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)			34

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)

IRONWORKERS LOCAL #103 POLITICAL ACTION LEAGUE

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement ILL. SENATE PRIMARY CAMPAIGN CONTRIBUTION Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SIMON FOR SENATE COMM. 30 W. WASHINGTON ST. CHICAGO, IL 60602		3-7-84	\$200.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			\$200.00



**International Association
of
Bridge, Structural and Ornamental Iron Workers**

Local No. 103
Affiliated with A.P.L.-C.I.O.
PHONE 477-9317

5313 Old Beechville Highway - Evansville, Indiana 47715

*Young
How do
you want to
get this!
V.*

October 16, 1984

Mr Mickey Brennan
Director I.P.A.L.
1750 New York Av., NW
Suite 400
Washington, DC 20006

Dear Sir & Brother:

On October the ninth of 1984 the Iron Workers Local #103 met and endorsed the following candidates for federal offices in our area:

- Walter Mondale - for President of the United States
- Geraldine Ferrarro - for Vice President of the United States
- Paul Simon - Candidate for Senator from Illinois
- Dee Huddleston - Senator from Kentucky
- Bill Natcher - Congressman 2nd District Kentucky
- Ken Gray - Candidate for Congress 22nd District Illinois
- Terry Bruce - Candidate for Congress 19th District Illinois
- Frank McCloskey - Congressman 9th District Indiana

Ken Gray is running for Paul Simon's old seat and was the Congressman previously for ten (10) terms, he is coming out of retirement to help labor and the Democrat party maintain the 22nd Illinois District. We have contributed \$250.00 in the primary and \$1,000.00 in the general election to Ken's race. We would heartily endorse a contribution to him from I.P.A.L.

Terry Bruce is running against one of the most radical and conservative members of Congress, Republican Dan Crane of the 19th Illinois District. Terry is currently running very close but Crane is pouring the money into the District. We have given Terry \$250.00 in the primary and \$1,000.00 in the general election. We would heartily endorse a contribution from I.P.A.L.

8 6 0 4 0 5 1 0 6 0 9

Frank McCloskey is currently the 8th District Congressman from Indiana and has just completed his first term. The Republican party has nominated Rick McIntyre, a conservative State Representative, to run against him. McIntyre is a staunch right-to-work advocate and has been getting money from N.I.C.P.A.C. committees who have Frank targeted for defeat. We have given Frank \$250.00 in the primary and \$1,200.00 in the general election. We urgently request that I.P.A.L. endorse and contribute to Frank McCloskey, Ken Gray and Terry Bruce. Below are the names and addresses of their committees:

Gray for Congress
1011 W Main St
Frankfort, IL 62896

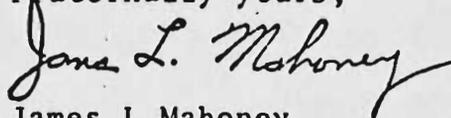
McCloskey for Congress
P O Box 2908
Evansville, IN 47714

Bruce for Congress
P O Box 206
Olney, IL 62450

We have given Senator Huddleston \$1,000.00 this year and he does not need anymore and told us to help out the other candidates. We have contributed \$450.00 to Paul Simon and were told that his maximum has been reached, and so has Mondale and Ferraro.

The other candidates did not request any contributions. We also contributed \$100.00 each to Congressmen Phil Sharp, 2nd District Indiana and Pat Glass, Congressional candidate, 10th District of Florida and \$250.00 to Carl C Perkins, Congressional candidate, 7th District of Kentucky. These candidates are not in our area but requested help.

Fraternally yours,



James L Mahoney
Secretary-P.A.C.

JLM/vvb

86040610610

OLD
NATIONAL
BANK
IN EVANSVILLE, INDIANA

Thank You
For Banking With Us

THIS IS YOUR RECEIPT
Subject to the rules and regulations of the bank governing checking accounts now in effect or as may be amended from time to time.

Seasons Greetings

THE TRANSACTION NUMBER, DATE AND AMOUNT OF YOUR DEPOSIT ARE SHOWN BELOW

350003 053

350003a #1188

RAL

Join our Christmas Savings Club

85040510611

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

MUR 2122

(Summary Page)

RECEIVED AT THE FEC

ALIGN AREA		ALIGN AREA
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1. Name of Committee (In Full)
NRLCA Political Action Committee

Address (Number and Street)
**1448 Duke Street
Suite 100**

City, State and ZIP Code
Alexandria, Virginia 22314

Check here if address is different than previously reported.

2. FEC Identification Number
C00072025

3. This committee qualified as a multicandidate committee during this Reporting Period on 1/1/83 (Date)

4. TYPE OF REPORT (Check appropriate boxes)
86 FEB 27 9:35

(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 _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

SUMMARY

5. Covering Period 7/1/83 through 12/31/83

6. (a) Cash on hand January 1, 19 83

(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
		\$ 178,074.88
	\$ 249,603.68	
	\$ 47,544.10	\$ 170,760.11
	\$ 297,147.78	\$ 348,834.99
	\$ 58,278.33	\$ 109,965.54
	\$ 238,869.45	\$ 238,869.45
	NONE	
	NONE	

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

Frank Newham, Sec. Treas
Type or Print Name of Treasurer

Frank Newham
SIGNATURE OF TREASURER

Feb. 20, 1986
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. § 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)

*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)

NRLCA Political Action Committee

C00072025

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Sala Burton for Congress P.O. Box 23099 Washington, D.C. 20024	1984 Campaign Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/12/83	200.00
B. Full Name, Mailing Address and ZIP Code Oaker for Congress Committee P.O. Box 2884 Washington, D.C. 20013	1984 Campaign Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/12/83	500.00
C. Full Name, Mailing Address and ZIP Code Durbin for Congress Comm. P.O. Box 2345 Washington, D. C. 20013	1984 Campaign Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/12/83	250.00
D. Full Name, Mailing Address and ZIP Code Penny for Cngress Committee 608 10th Ave. S.E. Waseca, Minnesota 56093	1984 Campaign Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/12/83	400.00
E. Full Name, Mailing Address and ZIP Code Friendso of Al Gore, Jr. P.O. Box 75663 Washington, D. C. 20013	1984 Campaign Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/12/83	500.00
F. Full Name, Mailing Address and ZIP Code Citizens for Gilman P.O. Box 3001 Middletown, New York 10940	1984 Campaign Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/12/83	400.00
G. Full Name, Mailing Address and ZIP Code Simon for Senate Committee 7 West Madison, #801 Chicago, Illinois 60602	1984 Campaign Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/12/83	1,000.00
H. Full Name, Mailing Address and ZIP Code Quillen for Congress Comm. P. O. Box 68 Kingsport, Tennessee 37662	1984 Campaign Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/25/83	300.00
I. Full Name, Mailing Address and ZIP Code McCloskey for Congress 210 7th St. S.E., #b-15 Washington, D. C. 20003	1984 Campaign Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/25/83	300.00
SUBTOTAL of Disbursements This Page (optional)			3,850.00
TOTAL This Period (last page this line number only)			

86040510614

Date	Payee	Amount	Chk #
10/12/83	Amin for Senate 7 West Madison # 801 Chicago, Ill. 60602 (84)	1000 ⁰⁰	#410
10/25/83	Quillen for Cong PO Box 68 Kingsport, Tenn 37662 (84)	300 ⁰⁰	#411
10/25/83	McClokey for Cong. c/o 210 7th St. S.E. #B-15 Wash, D.C. 20003 (84)	300 ⁰⁰	#412
10/25/83	Kephardt in Congress 113 C St. S.E. PH WASH, D.C. 20003 (84)	250 ⁰⁰	#413
10/25/83	Congressman Horton Comm. 606A So 15th St. Arl. Va 22202 (84)	300 ⁰⁰	#414
10/25/83	Friends of Don Albosta 312 A ST. S.E. Wash. D.C. 20003 (84)	500 ⁰⁰	#415
10/25/83	Duarini for Cong PO Box 2884 Wash. D.C 20013 (84)	250 ⁰⁰	#416

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

(Summary Page)

FEB 25 11:52

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

NRLCA Political Action Committee

Address (Number and Street)

1448 Duke Street
Suite 100

City, State and ZIP Code

Alexandria, Virginia 22314

Check here if address is different than previously reported.

2. FEC Identification Number

C00072025

3. This committee qualified as a multicandidate committee during this Reporting Period on 1/1/84 (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 _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

SUMMARY

5. Covering Period 1/1/84 through 3/31/84

6. (a) Cash on hand January 1, 19 84

(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) Cash on hand January 1, 19 84		\$ 238,869.45
(b) Cash on Hand at Beginning of Reporting Period	\$ 238,869.45	
(c) Total Receipts (from Line 18)	\$ 32,790.01	\$ 32,790.01
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 271,659.46	\$ 271,659.46
7. Total Disbursements (from Line 28)	\$ 36,575.59	\$ 36,575.59
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 235,083.87	\$ 235,083.87
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	NONE	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	NONE	

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

Frank Newham, Secretary/Treasurer
Type or Print Name of Treasurer

Frank Newham
SIGNATURE OF TREASURER

Feb. 20, 1986
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)

85040510615

ITEMIZED DISBURSEMENTS

Page 3 of 3
LINE NUMBER 21
 (Use separate schedule(s) for each category of the Detailed Summary Page)

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) **NRLCA Political Action Committee** C00072025

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Paul Simon for Senate Committee 10 W. Washington St. #615 Chicago, Illinois 60602	1984 Campaign	3/5/84	500.00
	Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Mason for Congress Committee P.O. Box 177-A Cockeek, Maryland 20607	1984 Campaign	3/5/84	300.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Critt for Congress Comm. P.O. Box 222 Greensboro, North Car. 27402	1984 Campaign	3/5/84	250.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Harry Smith for Congress Comm. 101 Conn. Ave. N.W #500 Washington, D.C. 20036	1984 Campaign	3/5/84	250.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Senior for Congress Comm. 140 Bradford Ct., #240 Alexandria, Va. 22311	1984 Campaign	3/5/84	250.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Lin for Congress Comm. 109 G Street S.E. Washington, D.C. 20003	1984 Campaign	3/22/84	250.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Siskowski for Congress Comm. 820 Abbotsford rd. Lexena, Virginia 22180	1984 Campaign	3/22/84	250.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Elect Wyche Fowler Comm. 17 C Street S.E. Washington, D.C. 20003	1984 Campaign	3/22/84	250.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Fowler for Congress Comm 32 Podium Dr. Lexena, Virginia 22180	1984 Campaign	3/22/84	250.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

TOTAL of Disbursements This Page (optional) 2,550.00

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)

FEB 25 1986
ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

NRLCA Political Action Committee

Address (Number and Street)

1448 Duke St.

City, State and ZIP Code

Alexandria, Virginia 22314

Check here if address is different than previously reported.

2. FEC Identification Number

C00072025

This committee qualified as a multicandidate committee during this Reporting Period on 1/1/83 (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 _____ in the State of _____
- Termination Report

(b) Is this Report an Amendment?

YES NO

SUMMARY

5. Covering Period 7/1/83 through 12/31/83

6. (a) Cash on hand January 1, 1983

(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

10. Debts and Obligations Owed BY the Committee

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on hand January 1, 19 <u>83</u>		\$ 178,074.88
(b) Cash on Hand at Beginning of Reporting Period	\$ 249,603.68	
(c) Total Receipts (from Line 18)	\$ 47,544.10	\$ 170,760.11
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 297,147.78	\$ 348,834.99
7. Total Disbursements (from Line 28)	\$ 58,278.33	\$ 109,965.54
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 238,869.45	\$ 238,869.45
9. Debts and Obligations Owed TO The Committee	NONE	
10. Debts and Obligations Owed BY the Committee	NONE	

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

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4088

Frank Newham, Sec. Treas

Type or Print Name of Treasurer

Frank Newham

SIGNATURE OF TREASURER

Feb. 20, 1986

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)

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)

NRLCA Political Action Committee

C00072025

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
New Mexicans for B. Richardson 1918 Belmont N. W. Washington, D. C. 20009	1984 Campaign	11/8/83	250.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Toby Roth for Congress '84 P.O. Box 2673 Appleton, Wisconsin 54913	1984 Campaign	11/8/83	250.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Friends of Neal Smith 59 G St. S. W. Washington, D. C. 20024	1984 Campaign	11/8/83	500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. V. Montgomery for Cong. 59 G St. S.W. Washington, D. C. 20024	1984 Campaign	11/8/83	200.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Robin Britt For Cong. Comm. P.O. Box 222 Greensboro, N.C. 27402	Luncheon for ** 1984 Campaign	11/9/83	184.68
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): **		
Corcoran for Senate Committee 11 2nd St. N. E. #205 Washington, D. C. 20002	1984 Campaign	11/16/83	500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Boucher for Congress Comm. 306 S. Columbus St. Alexandria, Virginia 22314	1984 Campaign	11/16/83	250.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Citizens for Harkin P.O. Box 75221 Washington, D. C. 20013	1984 Campaign	12/15/83	2,000.00
	Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): AMENDED (M)		
DeConcini Campaign Comm. P.O. Box 76296 Washington, D. C. 20013	1984 Campaign	12/16/83	350.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			4,484.68
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)

RECEIVED AT THE FEC ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

NRLCA Political Action Committee

Address (Number and Street)

1448 Duke Street

City, State and ZIP Code

Alexandria, Virginia 22314

Check here if address is different than previously reported.

2. FEC Identification Number

C00072025

3. This committee qualified as a multicandidate committee during this Reporting Period on 1/1/84 (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) April 15 Quarterly Report ^{86 FEB 27 A 9} 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 _____ in the State of _____

Termination Report

(b) Is this Report an Amendment?

YES NO

SUMMARY

5. Covering Period 4/1/83 through 6/30/83

6. (a) Cash on hand January 1, 19 83

(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)

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

Frank Newham, Sec. Treas.

Type or Print Name of Treasurer

Frank Newham
SIGNATURE OF TREASURER

2/20/86
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)

96040610619

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) **NRLCA Political Action Committee** C00072025

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Sikorski 121 11th St. S.E. Washington, D. C. 20003	1984 Campaign Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/3/83	150.00
Comm. To reelect Sen. Huddleston 4120 Ft. Worth Place Alexandria, Virginia 22304	1984 Campaign Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/15/83	2,000.00
Citizens for Petri Committee 5978 Powells Landing Rd. Burke Cneter, Virginia 22015	1984 Campaign Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/28/83	200.00
Democratic Congressional Committee 400 N. Capitol St. Washington, D. C. 20001	1984 Campaign Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/28/83	1,000.00
Comm. to reelect Cong. Robert Garcia 810 18th St. N.W. #802 Washington, D. C. 20006	1984 Campaign Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/28/83	250.00
Citizens for Harkin P.O. Box 75221 Washington, D. C. 20013	1984 Campaign Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): AMENDED	6/28/83	1,000.00
Friends of Lane Evans Comm P.O. Box 1222 Rock Island, Illinois 61201	1982 debt payment Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/28/83	300.00
Bingaman for Senate Comm. c/o Brown, Bain, Bingaman 1575 I St. N. W. #625 Washington, D. C. 20005	1982 Debt payment Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/28/83	1,000.00
Wyden for Congress Committee P.O. Box 12473 Portland, Oregon 97212	1984 Campaign Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/29/83	750.00
SUBTOTAL of Disbursements This Page (optional)			6,650.00
TOTAL This Page (last page this line number only)			31,153.95



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 31, 1986

Jeffrey W. Ryan
4757 Parkman Court
Annandale, VA 22003

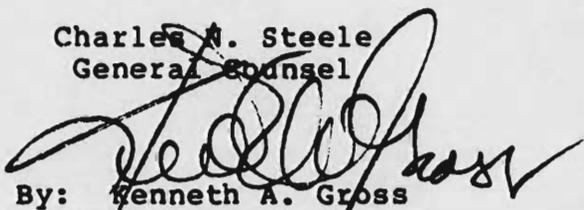
Dear Mr. Ryan:

This letter will acknowledge receipt of a complaint filed by you which we received on January 14, 1986, which alleges a possible violation of the Federal Election Campaign Act of 1971, as amended, the ("Act"), by Senator Paul Simon Raymond C. Wallace, John T. Traylor, James L. Mahoney, Frank Newham, Joseph Walsh, and Jerome D. O'Leary. The respondents will be notified as soon as the Commission takes action on your submission.

You will be notified as soon as the Commission takes final action on your complaint. Should you 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 procedures for handling complaints. We have numbered this matter under review MUR 2122. Please refer to this number in all future correspondence. If you have any questions, please contact Lorraine F. Ramos at (202) 376-3110.

Sincerely,

Charles A. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure

86040510621



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 31, 1986

Edward T. Joyce, Treasurer
Simon for Senate Committee
30 West Washington Street
Room 615
Chicago, Illinois 60602

Re: MUR 2122

Dear Mr. Joyce:

This letter is to notify you that the Federal Election Commission received a complaint which alleges that the Simon for Senate Committee and you, 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 2122. 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 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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If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 31, 1986

John T. Traylor
Ironworkers Political Action League
1750 New York Avenue, N.W., #400
Washington, D.C. 20006

Re: MUR 2122

Dear Mr. Traylor:

This letter is to notify you that the Federal Election Commission received a complaint which alleges that the Ironworkers Political Action League and you, 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 2122. 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 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.

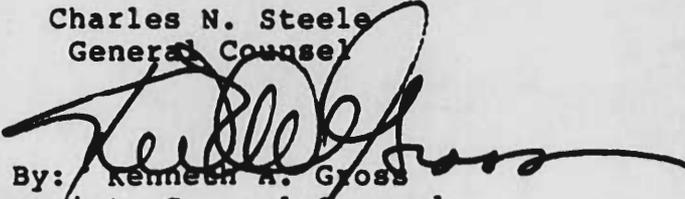
If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosures
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Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 31, 1986

Edward T. Joyce, Treasurer
Simon for Senate Committee
30 West Washington Street
Room 615
Chicago, Illinois 60602

Re: MUR 2122

Dear Mr. Joyce:

This letter is to notify you that the Federal Election Commission received a complaint which alleges that the Simon for Senate Committee and you, 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 2122. 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 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.

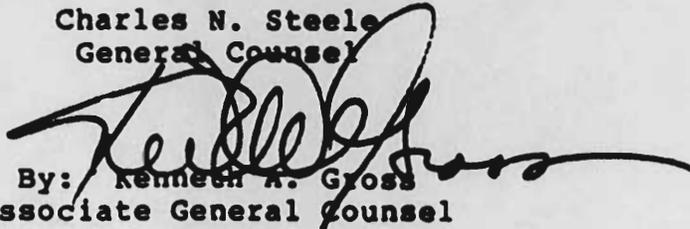
If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter at (202) 376-8200. 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 K. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 31, 1986

Joseph Walsh, Treasurer
United Association of Journeymen and
Apprentices of the Plumbing and
Pipefitting Industry, Political
Education Committee
P.O. Box 37800
Washington, D.C. 20013

Re: MUR 2122

Dear Mr. Walsh:

This letter is to notify you that the Federal Election Commission received a complaint which alleges that the United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry, Political Education Committee and you, 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 2122. 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 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.

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

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If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 31, 1986

Honorable Paul Simon
SD-462
U.S. Capitol
Washington, D.C. 20510

Re: MUR 2122

Dear Mr. Simon:

This letter is to notify you that 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 2122. 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 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.

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

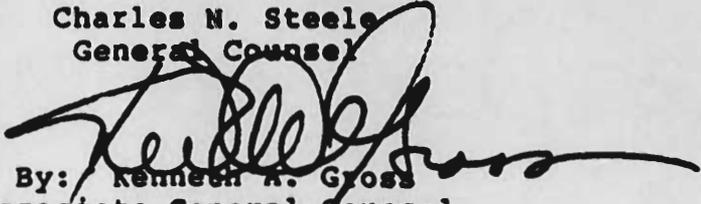
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If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Designation of Counsel Statement

86040510631



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 31, 1986

Jerome D. O'Leary, Treasurer
Plumbers and Pipefitters Local Union #25
Political Action Committee
1228 Third Avenue
Rock Island, Illinois 61201

Re: MUR 2122

Dear Mr. O'Leary:

This letter is to notify you that the Federal Election Commission received a complaint which alleges that the Plumbers and Pipefitters Local Union #25 Political Action Committee and you, 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 2122. 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 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.

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

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If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 31, 1986

Frank Newham, Treasurer
National Rural Letter Carriers' Association
Political Action Committee
Suite 1204
1750 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Re: MUR 2122

Dear Mr. Newham:

This letter is to notify you that the Federal Election Commission received a complaint which alleges that the National Rural Letter Carriers' Association Political Action Committee and you, 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 2122. 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 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.

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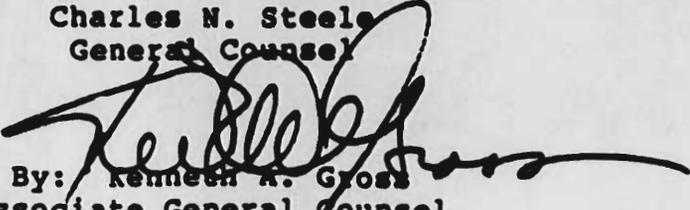
If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Designation of Counsel Statement

86040610635



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 31, 1986

James L. Mahoney, Treasurer
Ironworkers Local 103 Political Action League
5313 Old Boonville Highway
Evansville, Indiana 47715

Re: MUR 2122

Dear Mr. Mahoney:

This letter is to notify you that the Federal Election Commission received a complaint which alleges that the Ironworkers Local 103 Political Action League and you, 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 2122. 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 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.

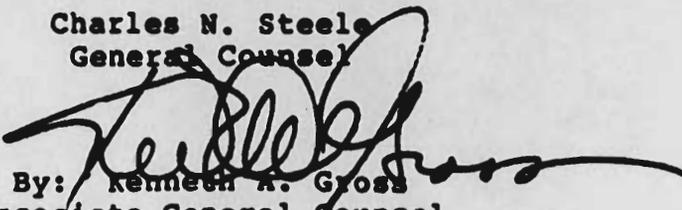
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If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Designation of Counsel Statement

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CC#9429

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

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RECEIVED
OFFICE OF THE
GENERAL COUNSEL

Jeffrey W. Ryan)
4757 Parkman Court)
Annandale, Virginia 22003,)
Complainant,)

v.)

MUR No. 2122

Paul Simon, Simon for Senate)
Committee, Amalgamated Transit)
Union - COPE, Ironworkers Political)
Action League, Ironworkers Local)
Union 103 - Political Action)
League, National Rural Letter)
Carriers Association - PAC, United)
Association of Journeymen and)
Apprentices of the Plumbing and)
Pipe Fitting Industry - PAC, and)
Plumbers and Pipefitters Local)
Union #25 Political Action Commit-)
tee and all the Committees')
treasurers,)
Respondents.)

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INTRODUCTION

1. Pursuant to 2 U.S.C. § 437g(a)(1), Jeffrey W. Ryan brings this complaint against candidate for federal public office, Paul Simon, Simon for Senate Committee, Ironworkers Local Union 103-Political Action League, Amalgamated Transit Union - COPE, Ironworkers Political Action League, National Rural Letter Carriers Association - PAC, and United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry - PAC, and Plumbers and Pipefitters Local Union #25 Political Action

8 6 0 4 0 5 1 0 6 4 0

- g. James L. Mahoney, individually and in his capacity as treasurer for Ironworkers Local 103 Political Action League
5313 Old Boonville Highway
Evansville, Indiana 47715
- h. National Rural Letter Carriers' Association PAC
1750 Pennsylvania Ave., N.W.
Suite 1204
Washington, D.C. 20006
- i. Frank Newham, individually and in his capacity as treasurer of National Rural Letter Carriers' Association PAC
1750 Pennsylvania Ave., N.W.
Suite 1204
Washington, D.C. 20006
- j. United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry - Political Education Committee
P.O. 37800
Washington, D.C. 20013
- k. Joseph Walsh, individually and in his capacity as treasurer of United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry - Political Education Committee
P.O. 37800
Washington, D.C. 20013
- l. Plumbers and Pipefitters Local Union #25 PAC
1228 3rd Avenue
Rock Island, Illinois 61201
- m. Jerome D. O'Leary, individually and in his capacity as treasurer of Plumbers and Pipefitters Local Union #25 PAC
1228 3rd Avenue
Rock Island, Illinois 61201

III. LIABILITY

3. Liability may be imposed upon the candidate, Paul Simon, Simon for Senate Committee, Amalgamated Transit Union Cope ("ATU-COPE"); Ironworkers Political Action League ("Ironworkers"); National Rural Letter Carriers Association -

PAC ("NRLCA - PAC"); and the United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry - Political Education Committee ("UA -PAC"), pursuant to 2 U.S.C. § 441a(a)(2)(A) which establishes the \$5,000.00 (FIVE THOUSAND DOLLARS) maximum contribution ceiling and 2 U.S.C. § 441a(f) which proscribes a candidate or political committee from accepting any contributions in excess of \$5,000.00 (FIVE THOUSAND DOLLARS).

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

5. For purposes of this complaint, contributions made by Ironworkers and its affiliated SSF, Ironworkers Local 103 PAL, 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)(2)(i)(B). Contributions made by UA-PAC and its affiliated SSF, Plumbers and Pipefitters Local #25 PAC, are treated in the same manner.

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 1984 federal primary election or an excess of \$5,000.00 (FIVE THOUSAND DOLLARS) for the 1984

federal general election in which Paul Simon 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 Paul Simon, Simon for Senate Committee, and its treasurer; ATU-PAC, and Ironworkers and its affiliated SSF, Ironworkers Local 103-PAL, NRLCA-PAC, UA-PAC and Plumbers and Pipefitters Local #25 PAC filed for the 1984 federal primary and general elections.

7. These unlawful contributions constitute violations 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, § 441a(f) which prohibits a candidate from receiving illegal contributions, and 11 C.F.R. § 103.3(b) which requires that excessive contributions be refunded.

**V. VIOLATIONS OF THE F.E.C.A.
BY
SIMON FOR SENATE COMMITTEE
IN THE
1984 FEDERAL PRIMARY AND GENERAL ELECTIONS**

8. 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, Paul Simon, Simon for Senate, and its treasurer, in violation of 2 U.S.C. § 441a(f), knowingly accepted contributions for the 1984 federal general election from ATU-PAC in the amount of \$5,250.00 (FIVE THOUSAND TWO HUNDRED AND FIFTY DOLLARS).

9. Candidate Paul Simon, Simon for Senate Committee and its treasurer, for the 1984 federal general election, accepted contributions from ATU-PAC in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>FEC Microfilm Location</u>
3/19/84	\$ 500.00	8402-009-0202
5/17/84	\$2,000.00	8402-014-2017
8/30/84	\$ 250.00	8402-023-0519
9/13/84	<u>\$2,500.00</u>	8402-023-0519
TOTAL	\$5,250.00	

10. A running total of the amount of contributions received from ATU-PAC, would have put on notice Paul Simon, the Simon for Senate Committee and its treasurer that they had received \$2,750.00 (TWO THOUSAND SEVEN HUNDRED FIFTY DOLLARS) on August 30, 1984. On that date, Paul Simon, Simon for Senate Committee and its treasurer were only permitted to accept an additional contribution of \$2,250.00 (TWO THOUSAND TWO HUNDRED FIFTY DOLLARS) towards the general election. In violation of 2 U.S.C. § 441a(f), they accepted an additional contribution and thereby exceeded the maximum \$5,000.00 (FIVE THOUSAND DOLLARS) the

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statute permits them to accept.

11. Paul Simon, Simon for Senate Committee and its treasurer failed to accurately report the \$500.00 (FIVE HUNDRED DOLLARS) contribution of March 19, 1984 noted above which was designated by ATU-PAC as a contribution for the general election. (See F.E.C. Microfilm #8403-311-3667.) In violation of 11 C.F.R. § 104.14(d), Paul Simon, Simon for Senate Committee and its treasurer reported it as a contribution for the primary election. (See F.E.C. Microfilm location above.) 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." Paul Simon, Simon for Senate Committee and its treasurer knowingly misreported the contribution in order to accept contributions in excess of the statutory limit.

12. Based on a review of the periodic reports, Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" and applicable amendments, which Respondents filed with the Federal Election Commission, Complainant believes that candidate for public office Paul Simon, Simon for Senate Committee and its treasurer, in violation of 2 U.S.C. § 441a(f), knowingly accepted contributions for the 1984 federal primary election from Ironworkers and its affiliated SSF, Ironworkers Local Union 103 PAL in the amount of \$5,350.00 (FIVE THOUSAND THREE HUNDRED

FIFTY DOLLARS).

13. Candidate Paul Simon, Simon for Senate Committee and its treasurer, for the 1984 federal primary election, accepted contributions from Ironworkers and its affiliated SSF, Local Union 103 PAL, in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>Contributor</u>	<u>F.E.C. Microfilm Location #</u>
3/16/84	\$ 200.00	Local 103	8402-009-0205
6/6/84	\$ 250.00	Local 103	8402-014-2023
6/22/84	\$ 100.00	Local 103	8402-014-2023
10/17/84	<u>\$4,800.00</u>	Ironworkers	8402-023-3909
Total = \$5,350.00			

14. A running total of the amount of contributions received from Ironworkers and its affiliated SSF, Ironworkers Local Union 103 PAL, would have put on notice Paul Simon, Simon for Senate Committee and its treasurer that they had received \$550.00 (FIVE HUNDRED FIFTY DOLLARS) on June 22, 1984. On that date, Paul Simon, Simon for Senate Committee and its treasurer could lawfully accept only \$4,450.00 in contributions from Ironworkers. In violation of 2 U.S.C. § 441a(f), Paul Simon, Simon for Senate Committee and its treasurer accepted contributions from Ironworkers and Ironworkers Local Union 103 PAL in the amount of \$4,800.00 (FOUR THOUSAND EIGHT HUNDRED DOLLARS). This amount exceeded the statutory monetary ceiling by \$350.00 (THREE HUNDRED FIFTY DOLLARS).

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15. Paul Simon, Simon for Senate Committee and its treasurer failed to accurately report the \$250.00 (TWO HUNDRED FIFTY DOLLARS) contribution of June 6, 1984 and \$100.00 (ONE HUNDRED DOLLARS) contribution of June 22, 1984 which were designated by Ironworkers Local 103 PAL as contributions for the primary election. (See F.E.C. Microfilm #8403-319-4402.) In violation of 11 C.F.R. § 104.14(d), Paul Simon, Simon for Senate Committee and its treasurer reported it as a contribution for the general election. (See F.E.C. Microfilm locations above.) 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." Paul Simon, Simon for Senate Committee and its treasurer knowingly misreported the contribution in order to accept contributions in excess of the statutory limit.

16. Based on a review of 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 Paul Simon, Simon for Senate Committee and its treasurer, in violation of 2 U.S.C. § 441a(f), knowingly accepted contributions for the 1984 federal general election from NRLCA - PAC, in the amount of \$6,500.00 (SIX THOUSAND FIVE HUNDRED DOLLARS).

17. Candidate Paul Simon, Simon for Senate Committee and its treasurer, for the 1984 federal general election, accepted contributions from NRLCA - PAC in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>Contributor</u>	<u>F.E.C. Microfilm Location #</u>
11/23/83	\$1,000.00	NRLCA-PAC	8402-004-0102
03/10/84	\$ 500.00	NRLCA-PAC	8402-009-0206
09/17/84	\$2,000.00	NRLCA-PAC	8402-023-0527
10/25/84	\$2,000.00	NRLCA-PAC	8402-028-2385
11/04/84	<u>\$1,000.00</u>	NRLCA-PAC	8402-028-2385

Total = \$6,500.00

18. A running total of the amount of contributions received from NRLCA-PAC, would have put on notice Paul Simon, Simon for Senate Committee and its treasurer that they had received \$3,500.00 (THREE THOUSAND FIVE HUNDRED DOLLARS) on September 17, 1984. On that date, Paul Simon, Simon for Senate Committee and its treasurer could lawfully accept only \$1,500.00 (ONE THOUSAND FIVE HUNDRED DOLLARS) more. 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.

19. In violation of 11 C.F.R. § 104.14(d), Paul Simon, Simon for Senate Committee and its treasurer designated the \$500.00 (FIVE HUNDRED DOLLARS) contribution of March 10, 1984 and the \$1,000.00 (ONE THOUSAND DOLLAR) November 23, 1983 contribution for the primary election. (See F.E.C. Microfilm above.) Both

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contributions which were made by NRLCA-PAC on March 5, 1984 and October 12, 1984 respectively, were designated for the general election. (See F.E.C. Microfilm #8403-310-2232 and 8403-293-4705). Moreover, Paul Simon, Simon for Senate Committee and its treasurer misreported: 1) the contribution received on September 17, 1984 of \$2,000.00 as both for the primary and general election when it was designated for the general election (Microfilm #8403-338-4841); 2) the \$2,500.00 contribution received on July 1, 1984 for both the primary and general election when it was designated for the primary election (Microfilm #8403-320-1349); 3) the \$1,000.00 contribution received on July 11, 1984 for both the primary and general elections when it was designated for the primary election (Microfilm #8403-320-1348); 4) the \$2,000.00 contribution received on October 25, 1984 for both the primary and general elections when it was designated for the general election (Microfilm #8403-346-0891), 5) the \$1,000.00 contribution received on November 4, 1984 for both the primary and general elections when designated by NRLCA-PAC for the 1984 primary debt (Microfilm #8403-349-4165). Pursuant to 11 C.F.R. § 110.1(a)(2)(i), the contribution must be solely allocated to the general election campaign since there was no primary debt as of that date according to the Simon for Senate reports filed with the Commission. 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." Paul Simon, Simon for Senate Committee and its treasurer by the actions described above, knowingly misreported the NRLCA-PAC contributions in order to accept contributions from NRLCA-PAC in excess of the statutory limit.

20. Based on a review of 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 Paul Simon, Simon for Senate Committee and its treasurer, in violation of 2 U.S.C. § 441a(f), knowingly accepted contributions for the 1984 federal general election from UA-PAC, in the amount of \$7,900.00 (SEVEN THOUSAND NINE HUNDRED DOLLARS).

21. Candidate Paul Simon, Simon for Senate Committee and its treasurer, for the 1984 federal general election, accepted contributions from UA-PAC in the following amounts:

<u>Date Received</u>	<u>Amount</u>	<u>Contributor</u>	<u>F.E.C. Microfilm Location #</u>
08/13/84	\$5,000.00	UA-PAC	8402-023-0530
11/04/84	\$2,800.00	UA-PAC	8402-028-2389
08/22/84	\$ 100.00	Local #25	8402-340-1213
Total =		\$7,900.00	

22. A running total of the amount of contributions received from UA-PAC, would have put on notice Paul Simon, Simon for Senate Committee and its treasurer that they had received \$5,000.00 (FIVE THOUSAND DOLLARS) on August 13, 1984 for

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the general election. On that date, Paul Simon, Simon for Senate Committee and its treasurer were not permitted to accept additional contributions. 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.

23. The Illinois primary election was held on March 20, 1984.

24. In violation of 11 C.F.R. § 104.14(d), Paul Simon, Simon for Senate Committee and its treasurer designated the \$2,800.00 (TWO THOUSAND EIGHT HUNDRED DOLLARS) contribution of November 4, 1984 for the primary election. (See F.E.C. Microfilm above.) The \$2,800.00 (TWO THOUSAND EIGHT HUNDRED DOLLARS) contribution made by UA-PAC on October 26, 1984 was undesignated. (See F.E.C. Microfilm #8403-352-5202). Therefore it must be allocated to the general election pursuant to 11 C.F.R. § 110.1(a)(2)(ii)(B). Moreover, the \$100.00 contribution of August 22, 1984 was designated by Plumbers and Pipefitters Local Union #25-PAC to the primary debt which had already been paid. Therefore, it must be allocated to the general election campaign under 11 C.F.R. § 110.1(a)(2)(i). 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." Paul Simon, Simon for Senate Committee and its treasurer by the

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Microfilm #8403-320-5492).

d. On September 5, 1984, it contributed \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLARS) designated for the general election. (See F.E.C. Microfilm #8403-343-2257).

27. A running total of the amount contributed to Paul Simon, Simon for Senate Committee and its treasurer by ATU-COPE, would have put them on notice that as of June 25, 1984, they had contributed \$2,750.00 (TWO THOUSAND SEVEN HUNDRED FIFTY DOLLARS). In violation of 2 U.S.C. § 441a(a)(2)(A), ATU-COPE made a \$2,500.00 (TWO THOUSAND FIVE HUNDRED DOLLAR) contribution on September 5, 1984 which exceeded the \$5,000.00 (FIVE THOUSAND DOLLARS) ceiling by \$250.00 (TWO HUNDRED FIFTY DOLLARS).

**VII. VIOLATIONS OF THE F.E.C.A.
BY
IRONWORKERS AND
IRONWORKERS LOCAL UNION 103 PAL
IN THE
1984 FEDERAL PRIMARY 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 Ironworkers and its affiliated SSF, Ironworkers Local 103 PAL, for the 1984 federal primary election designated and therefore contributed to candidate Paul Simon, Simon for Senate Committee, and its treasurer a total of \$5,350.00 (FIVE THOUSAND THREE HUNDRED FIFTY

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actions described above, knowingly misreported the UA-PAC contributions in order to accept contributions from UA-PAC in excess of the statutory limit.

**VI. VIOLATIONS OF THE F.E.C.A.
BY
ATU-COPE
IN THE
1984 FEDERAL GENERAL 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 ATU-COPE, for the 1984 federal general election designated and therefore contributed to candidate Paul Simon, Simon for Senate Committee and its treasurer a total of \$5,250.00 (FIVE THOUSAND TWO HUNDRED FIFTY DOLLARS).

26. ATU-COPE contributed the following amounts:

a. On March 14, 1984, it contributed \$500.00 (FIVE HUNDRED DOLLARS) designated for the general election. (See F.E.C. Microfilm #8403-311-3667).

b. On April 5, 1984, it contributed \$2,000.00 (TWO THOUSAND DOLLARS) designated for the general election. (See F.E.C. Microfilm #8403-314-0642).

c. On June 25, 1984, it contributed \$250.00 (TWO HUNDRED FIFTY DOLLARS) designated for the general election. (See F.E.C.

DOLLARS).

29. Ironworkers and its affiliated SSF, Ironworkers Local Union 103 PAL, contributed the following amounts:

a. On March 7, 1984, Ironworkers Local Union 103 PAL contributed \$200.00 (TWO HUNDRED DOLLARS) designated for the primary election. (See F.E.C. Microfilm #8403-318-1807).

b. On May 2, 1984, Ironworkers Local union 103 PAL, contributed \$250.00 (TWO HUNDRED FIFTY DOLLARS) designated for the primary election. (See F.E.C. Microfilm #8403-319-4402).

c. On May 17, 1984, Ironworkers Local Union 103 PAL contributed \$100.00 (ONE HUNDRED DOLLARS) designated for the primary election. (See F.E.C. Microfilm #8403-319-4402).

d. On October 9, 1984, Ironworkers contributed \$4,800.00 (FOUR THOUSAND EIGHT HUNDRED DOLLARS) designated for the primary deficit. (See F.E.C. Microfilm #8403-345-1154).

30. A running total of the amount contributed to Paul Simon, Simon for Senate Committee and its treasurer by Ironworkers-COPE, would have put on notice Ironworkers and its affiliated SSF, Ironworkers Local Union 103 PAL, that as of May 17, 1984, it had contributed \$550.00 (FIVE HUNDRED FIFTY DOLLARS) and that it could only contribute \$4,450.00 (FOUR THOUSAND FOUR HUNDRED FIFTY DOLLARS) if it wished to meet the mandates of the law. In violation of 2 U.S.C. § 441a(a)(2)(A), a contribution of \$4,800.00 (FOUR THOUSAND EIGHT HUNDRED DOLLARS) was made to Paul

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Simon, Simon for Senate Committee and its treasurer by Ironworkers. The amount exceeded the statutory monetary ceiling by \$350.00 (THREE HUNDRED FIFTY DOLLARS).

**VIII. VIOLATIONS OF THE F.E.C.A.
BY
NRLCA-PAC
IN THE
1984 FEDERAL GENERAL ELECTION**

31. 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 NRLCA-PAC for the 1984 Federal general election designated and therefore contributed to candidate Paul Simon, Simon for Senate Committee, and its treasurer a total of \$6,500.00 (SIX THOUSAND FIVE HUNDRED DOLLARS).

32. NRLCA-PAC contributed the following amounts designated for the 1984 federal general election:

a. On October 12, 1983, it contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm #8403-293-4705).

b. On March 5, 1984, it contributed \$500.00 (FIVE HUNDRED DOLLARS). (See F.E.C. Microfilm #8403-310-2232).

c. On September 7, 1984, it contributed \$2,000.00 (TWO THOUSAND DOLLARS). (See F.E.C. Microfilm #8403-338-4841).

d. On October 4, 1984, it contributed \$2,000.00 (TWO THOUSAND DOLLARS). (See F.E.C. Microfilm #8403-346-0891).

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e. On November 1, 1984 it contributed \$1,000.00 (ONE THOUSAND DOLLARS). (See F.E.C. Microfilm #8403-349-4165). This contribution was designated for reducing the primary debt. Since there was none, it must be allocated to the general election campaign pursuant to 11 C.F.R. § 110.1(a)(2)(i), regardless of NRLCA's intent to circumvent the regulation.

33. A running total of the amount contributed to Paul Simon, Simon for Senate Committee and its treasurer would have put on notice NRLCA-PAC that as of September 7, 1984, it had contributed \$3,500.00 (THREE THOUSAND FIVE HUNDRED DOLLARS) and that it could only contribute \$1,500.00 (ONE THOUSAND FIVE HUNDRED DOLLARS) if it wished to meet the mandates of the law. In violation of 2 U.S.C. § 441a(a)(2)(A), contributions of \$2,000.00 (TWO THOUSAND DOLLARS) and \$1,000.00 (ONE THOUSAND DOLLARS) were made to Paul Simon, Simon for Senate Committee and its treasurer by NRLCA-PAC. The amount exceeded the statutory monetary ceiling by \$1,500.00 (ONE THOUSAND FIVE HUNDRED DOLLARS).

**VIII. VIOLATIONS OF THE F.E.C.A.
BY
UA-PAC AND PLUMBERS AND PIPEFITTERS
LOCAL UNION #25 POLITICAL ACTION COMMITTEE
IN THE
1984 FEDERAL GENERAL ELECTION**

34. 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 UA-PAC and its

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affiliated SSF, Plumbers and Pipefitters Local Union #25 PAC, for the 1984 Federal general election designated and therefore contributed to candidate Paul Simon, Simon for Senate Committee, and its treasurer a total of \$8,100.00 (EIGHT THOUSAND ONE HUNDRED DOLLARS).

35. UA-PAC and its affiliated SSF, Plumbers and Pipefitters Local Union #25 PAC, contributed the following amounts:

a. On July 3, 1984, UA-PAC contributed \$5,000.00 (FIVE THOUSAND DOLLARS) designated for the general election. (See F.E.C. Microfilm #8403-326-0316.)

b. On August 22, 1984, Plumbers and Pipefitters Local Union #25 PAC, contributed \$100.00 (ONE HUNDRED DOLLARS) to reduce the primary debt. (See F.E.C. Microfilm #8403-340-1213).

c. On September 19, 1984, Plumbers and Pipefitters Local Union #25 PAC contributed \$200.00 (TWO HUNDRED DOLLARS) designated to reduce the primary debt. (See F.E.C. Microfilm #8403-340-1213).

d. On October 26, 1984, UA-PAC contributed \$2,800.00 (TWO THOUSAND EIGHT HUNDRED DOLLARS) which was undesignated. (See F.E.C. Microfilm #8403-352-5202). Pursuant to 11 C.F.R. § 110.1(a)(2)(ii)(B), this contribution is allocated to the general election cycle.

36. A running total of the amounts contributed to Paul Simon, Simon for Senate Committee and its treasurer would have put on

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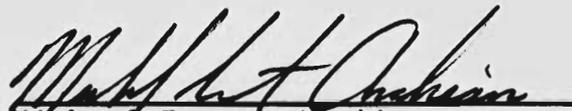
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notice UA-PAC and its affiliated SSF, Plumbers and Pipefitters Local Union #25 PAC, that as of July 3, 1984, it had contributed \$5,000.00 (FIVE THOUSAND DOLLARS) and that it could contribute no more if it wished to meet the mandates of the law. In violation of 2 U.S.C. § 441a(a)(2)(A), contributions of \$2,800.00 (TWO THOUSAND EIGHT HUNDRED DOLLARS), \$100.00 (ONE HUNDRED DOLLARS) and \$200.00 (TWO HUNDRED DOLLARS) were made to Paul Simon, Simon for Senate Committee and its treasurer by UA-PAC and Plumbers and Pipefitters Local Union #25 PAC. The amount exceeded the statutory monetary ceiling by \$3,100.00 (THREE THOUSAND ONE HUNDRED DOLLARS).

CONCLUSION

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

38. Complainant requests that an investigation into this complaint be undertaken, that Respondents Paul Simon, Simon for Senate Committee and its treasurer be ordered to return the accepted excess contributions pursuant to 11 C.F.R. § 103.3(b) and that civil sanctions and fines be imposed on all the Respondents.



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

Attorney for Complainant

January 14, 1986

VERIFICATION OF CITIZEN COMPLAINANT

County of Fairfax)
Commonwealth of Virginia)

ss.

Pursuant to 2 U.S.C. § 437g(a)(1), I, Jeffrey W. Ryan, 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 Virginia.

Jeff W. Ryan

Subscribed and sworn to before me this 13th day of JANUARY
_____ 1986.

Barbara A. McMullen
Notary Public

My Commission expires:
My Commission Expires November 18, 1988

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DESIGNATION OF COUNSEL

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

JANUARY 13, 1986
Date

Jeff W. Ryan
Complainant

DESIGNATED COUNSEL

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

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FEDERAL ELECTION COMMISSION

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

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Date Filmed 8/21/86 Camera No. --- 2

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