



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2584

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

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Ray O. Brooks, Jr.  
1020 Suzanne Avenue  
Knoxville, Tennessee 37920

Complainant,

v.

Albert Gore, Jr.; Friends of  
Albert Gore, Jr. Committee;  
Amalgamated Clothing and Textile  
Workers Union Political Action  
Committee; Amalgamated Transit  
Union - COPE; Seafarers Political  
Activity Donation; and all the  
Committees' Treasurers,

Respondents.

Complaint

MUR No. 2584

I. INTRODUCTION

1. Pursuant to 2 U.S.C. § 437g(a)(1), Ray O. Brooks, Jr. brings this complaint against candidate for federal public office, Albert Gore, Jr. Friends of Albert Gore, Jr. Committee, Amalgamated Clothing and Textile Workers Union Political Action Committee, Amalgamated Transit Union - COPE, Seafarers Political Activity Donation, and all the Committees' treasurers individually and in their capacities as treasurers for making and receiving of excessive contributions in violation of 2 U.S.C. § 441a(f) and 2 U.S.C. § 441a(a)(2)(A).

II. PARTIES

2. Complainant is Ray O. Brooks, Jr. who resides at 1020 Suzanne Avenue, Knoxville, Tennessee 37920. He is a citizen of the United States, over the age of 18 years and a registered voter of the State of Tennessee.

Respondents are:

- a. Albert Gore, Jr., United States Senate, 393 Russell Senate Building, Washington, D.C. 20510.
- b. Jack Wright Robinson, Treasurer, Friends of Albert Gore, Jr., P.O. Box 2757, Nashville, Tennessee 37219.
- c. Mr. R. C. Wallace, Treasurer, ATU-COPE Account - Voluntary Fund, 5025 Wisconsin Avenue, N.W., Washington, D.C. 20016.
- d. Amalgamated Transit Union-COPE, 5025 Wisconsin Avenue, N.W., Washington, D.C. 20016.
- e. Mr. Jack Sheinkman, Treasurer, Amalgamated Clothing and Textile Workers Union, 15 Union Square, New York, New York 10003.
- f. Amalgamated Clothing and Textile Workers Union, 15 Union Square, New York, New York 10003.

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- g. Mr. Frank Drozak, Chairman, Seafarers Political Activity Donation, Seafarers International Union, 5201 Auth Way, Camp Springs, Maryland 20746.
- h. Seafarers Political Action Donation, Seafarers International union, 5201 Auth Way, Camp Springs, Maryland 20746.

### III. LIABILITY

3. Liability may be imposed upon the candidate, Albert Gore, Jr., Friends of Albert Gore, Jr. Committee, Amalgamated Clothing and Textile Workers Union Political Action Committee, Amalgamated Transit Union-COPE, and Seafarers Political Activity Donation pursuant to 2 U.S.C. § 441a(a) which establishes the \$5,000.00 (FIVE THOUSAND DOLLARS) maximum contribution ceiling and 2 U.S.C. § 441a(f) which proscribes a candidate or political committee from accepting any contributions in excess of \$5,000.00 (FIVE THOUSAND DOLLARS).

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

### IV. OVERVIEW

5. 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 Albert Gore, Jr. was a candidate for public office. Complainant bases his belief on review of the Federal Election Commission Forms 3 and 3X, Schedules "A" and "B" which Albert Gore, Jr.; Friends of Albert Gore, Jr. Committee; Amalgamated Clothing and Textile Workers Union

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Political Action Committee; Amalgamated Transit Union-COPE, and Seafarers Political Activity Donation and all Committees' treasurers filed for the 1984 federal Congressional election.

6. For the 1984 federal primary election, excessive funds were contributed to Albert Gore, Jr.; Friends of Albert Gore, Jr. Committee; by the Seafarers Political Activity Donation and all Committees' treasurers. For the 1984 general election, excessive funds were contributed to Albert Gore, Jr.; Friends of Albert Gore, Jr. Committee; by Amalgamated Clothing and Textile Workers Union Political Action Committee and Amalgamated Transit Union-COPE, and all the Committees' treasurers.

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

V. VIOLATIONS OF THE F.E.C.A. BY  
FRIENDS OF ALBERT GORE, JR. COMMITTEE  
IN THE 1984 FEDERAL PRIMARY ELECTION

8. 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, Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, in violation of 2 U.S.C. § 441a(f), knowingly

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accepted contributions for the 1984 federal primary election from Seafarers Political Activity Donation ("SPAD") in the amount of \$10,000.00 (TEN THOUSAND DOLLARS).

9. Candidate Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, for the 1984 federal primary election, accepted contributions from the SPAD in the following amounts:

| <u>Date Received</u> | <u>Amount</u> | <u>F.E.C. Microfilm Locations</u> |
|----------------------|---------------|-----------------------------------|
| 6/30/83              | \$ 5,000.00   | 8302-005-0959                     |
| 12/23/83             | \$ 5,000.00   | 8402-003-1797                     |
| Total =              | \$10,000.00   |                                   |

10. A running total of the amount of contributions received from SPAD would have put on notice Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer that they had received \$5,000.00 (FIVE THOUSAND DOLLARS) on June 30, 1983. On that date, Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer were not permitted to accept any additional contributions. In violation of 2 U.S.C. § 441a(f), they accepted an additional contribution designated for the primary election and thereby exceeded the maximum \$5,000.00 (FIVE THOUSAND DOLLARS) the statute permits them to accept.

11. Albert Gore, Jr., Friends of Albert Gore, Jr. and its treasurer failed to accurately report the December 23 1983 \$5,000.00 (FIVE THOUSAND DOLLARS) contribution from SPAD. SPAD reported making the contribution on December 7, 1983 and designated it for the primary election. (See F.E.C. Microfilm #8403-294-2612.) In violation of 11 C.F.R § 104.14(d), Albert Gore,

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Jr., Friends of Albert Gore, Jr. Committee and its treasurer inaccurately reported receiving the \$5,000.00 (FIVE THOUSAND DOLLARS) contribution from SPAD on December 23, 1983 and indicated that it was a contribution for the general election on their F.E.C. Form 3, Schedule "A", which was dated December 23, 1983. (See F.E.C. Microfilm #8402-003-1797).<sup>1</sup> 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."

12. F.E.C. regulations, 11 C.F.R. § 110.1(a)(1) and § 110.1(a)-(2)ii, provide that "[i]n the case of a contribution not designated in writing for a particular election" by the contributor, the next scheduled election shall by law be the designated election. The respondents also violated this regulation. See General Counsel's Report, MUR 2110 at 10 (11 C.F.R. §§ 110.1(a) and 102.9(e), "should not be construed as permission for the recipient committee to assign contributions to a particular election" or "determine election designations."). Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer knowingly misreported the second \$5,000.00 contribution in order to accept contributions from SPAD in excess of the statutory limit.

13. Based on a review of the periodic reports, Federal Election

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<sup>1</sup>The 1984 Tennessee Congressional primary election was held on August 2, 1984.

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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, Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, in violation of 2 U.S.C. § 441a(f), knowingly accepted contributions for the 1984 federal general election from Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU") in the amount of \$6,000.00 (SIX THOUSAND DOLLARS).

14. Candidate Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, for the 1984 general election, accepted contributions from ACTWU in the following amounts:

| <u>Date Received</u> | <u>Amount</u>      | <u>F.E.C. Microfilm Location</u> |
|----------------------|--------------------|----------------------------------|
| 11/26/83             | \$ 200.00          | 8402-003-1767                    |
| 12/30/83             | \$ 800.00          | 8402-003-1767                    |
| 09/05/84             | \$ <u>5,000.00</u> | 8402-021-1484                    |
| Total =              | \$ 6,000.00        |                                  |

15. A running total of the amount of contributions received from ACTWU would have put on notice Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer that they had received \$1,000.00 (ONE THOUSAND DOLLARS) on December 30, 1983. On that date, Albert Gore, Jr., Friends of Albert Gore, Jr. and its treasurer were only permitted to accept an additional contribution of \$4,000.00 (FOUR THOUSAND DOLLARS). In violation of 2 U.S.C. § 441a(f), they accepted additional contributions and thereby exceeded the maximum \$5,000.00 (FIVE THOUSAND DOLLARS) the statute permits them to accept.

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16. Albert Gore, Jr., Friends of Albert Gore, Jr. and its treasurer failed to accurately report the \$200.00 (TWO HUNDRED DOLLARS) contribution of November 26, 1983 which was designated by ACTWU as a contribution for the general election. (See F.E.C. Microfilm #8303-289-4364.) In violation of 11 C.F.R. § 104.14(d), Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer reported receiving the \$200.00 (TWO HUNDRED DOLLARS) contribution from ACTWU on November 26, 1983 and indicated that it was a contribution for the primary election. The contribution was reported by Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer on their F.E.C. Form 3, Schedule "A", which was dated November 26, 1983. (See F.E.C. Microfilm #8402-003-1767.) 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."

17. F.E.C. regulations, 11 C.F.R. § 110.1(a)(1) and § 110.1(a)-(2)ii, provide that "[i]n the case of a contribution not designated in writing for a particular election" by the contributor, the next scheduled election shall be the designated election. The respondents also violated this regulation. Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer knowingly misreported the contribution in order to accept contributions from ACTWU in excess of the statutory limit.

18. Based on a review of the periodic reports, Federal Election

Commissions 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, Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, in violation of 2 U.S.C. § 441a(f), knowingly accepted contributions for the 1984 federal general election from Amalgamated Transit Union-COPE ("ATU-COPE") in the amount of \$6,000.00 (SIX THOUSAND DOLLARS).

19. Candidate Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, for the 1984 general election, accepted contributions from ATU-COPE in the following amounts:

| <u>Date Received</u> | <u>Amount</u>      | <u>F.E.C. Microfilm Location</u> |
|----------------------|--------------------|----------------------------------|
| 11/01/83             | \$ 500.00          | 8402-003-1769                    |
| 11/21/83             | \$ 1,000.00        | 8402-003-1769                    |
| 03/20/84             | \$ 500.00          | 8402-008-1410                    |
| 06/25/84             | \$ 1,500.00        | 8402-014-1372                    |
| 09/11/84             | \$ <u>2,500.00</u> | 8402-021-1484                    |
| Total =              | \$ 6,000.00        |                                  |

20. A running total of the amount of contributions received from ATU-COPE would have put on notice Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer that they had received \$3,500.00 (THIRTY-FIVE HUNDRED DOLLARS) on June 25, 1984. On that date, Albert Gore, Jr., Friends of Albert Gore, Jr. and its treasurer were only permitted to accepted an additional contribution of \$1,500.00 (ONE THOUSAND FIVE HUNDRED DOLLARS). In violation of 2 U.S.C. § 441a(f), they accepted additional contributions and thereby exceeded the maximum \$5,000.00 (FIVE THOUSAND DOLLARS) the statute permits.

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21. Albert Gore, Jr., Friends of Albert Gore, Jr. and its treasurer failed to accurately report the \$500.00 (FIVE HUNDRED DOLLARS) contribution of November 1, 1983 (F.E.C. Microfilm #8303-287-2494); \$1,000.00 (ONE THOUSAND DOLLARS) contribution of November 21, 1983 (F.E.C. Microfilm #8303-289-0244); \$500.00 (FIVE HUNDRED DOLLARS) contribution of March 3, 1984 (F.E.C. Microfilm #8403-299-1009); \$1,500.00 (FIVE HUNDRED DOLLARS) contribution of June 25, 1984 (F.E.C. Microfilm #8403-317-3553), which were designated by ATU-COPE as contributions for the general election. In violation of 11 C.F.R. § 104.14(d), Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer reported receiving the \$500.00 (FIVE HUNDRED DOLLARS) on November 1, 1983 (F.E.C. Microfilm #8402-003-1769); \$1,000.00 (ONE THOUSAND DOLLARS) on November 21, 1983 (F.E.C. Microfilm #8402-003-1769); \$500.00 (FIVE HUNDRED DOLLARS) on March 20, 1984 (F.E.C. Microfilm #8402-008-1410); \$1,500.00 (FIFTEEN HUNDRED DOLLARS) on June 25, 1984 (F.E.C. Microfilm #8402-014-1372); and \$1,000.00 (ONE THOUSAND DOLLARS) on June 25, 1984 (F.E.C. Microfilm #8402-014-1372), contributions from ATU-COPE and indicated that they were contributions for the primary election. The contributions were reported by Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer on their F.E.C. Form 3, Schedule "A". F.E.C. regulation, 11 C.F.R. § 104.14(d), provides that a treasurer "shall be personally responsible for the timely and complete filing of the report or statement and for the accuracy of any information or statement contained therein."

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22. F.E.C. regulations, 11 C.F.R. § 110.1(a)(1) and § 110.1(a)-(2)ii, provide that "[i]n the case of a contribution not designated in writing for a particular election" by the contributor, the next scheduled election shall by law be the designated election. The respondents also violated this regulation. Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer knowingly misreported the contribution in order to accepted contributions from ATU-COPE in excess of the statutory limit.

VI. VIOLATIONS OF THE F.E.C.A.  
 BY  
 SEAFARERS POLITICAL ACTIVITY DONATION  
 IN THE  
1984 FEDERAL PRIMARY ELECTION

23. 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 SPAD knowingly contributed to candidate for public office, Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, in violation of 2 U.S.C. § 441a(a)(2)(A), contributions designated for the 1984 federal primary election in the amount of \$10,000.00 (TEN THOUSAND DOLLARS).

24. SPAD contributed to candidate Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, for the 1984 primary election, in the following amounts:

| <u>Date Contributed</u> | <u>Amount</u>      | <u>F.E.C. Microfilm Locations</u> |
|-------------------------|--------------------|-----------------------------------|
| 6/29/83                 | \$ 5,000.00        | 8303-277-0050                     |
| 12/07/83                | <u>\$ 5,000.00</u> | 8403-294-2612                     |

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Total = \$10,000.00

25. A running total of the amount of contributed to Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer would have put SPAD on notice that it had contributed \$5,000.00 (FIVE THOUSAND DOLLARS) on June 29, 1983. On that date, SPAD and its treasurer were not permitted to make additional contributions towards the primary election if they wished to meet the mandates of the law. In violation of 2 U.S.C. § 441a(a)(2)(A), a \$5,000.00 (FIVE THOUSAND DOLLARS) contribution was made to Albert Gore, Jr., Friends of Albert Gore, Jr. and its treasurer. This amount exceeded the statutory monetary ceiling by \$5,000.00 (FIVE THOUSAND DOLLARS).

VII. VIOLATIONS OF THE F.E.C.A.  
BY  
AMALGAMATED CLOTHING AND TEXTILE WORKERS UNION  
POLITICAL ACTION COMMITTEE  
IN  
1984 FEDERAL GENERAL ELECTION

26. 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 ACTWU-PAC knowingly contributed to candidate for public office, Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, in violation of 2 U.S.C. § 441a(a)(2)(A), contributions designated for the 1984 federal general election, in the amount of \$6,000.00 (SIX THOUSAND DOLLARS).

27. ACTWU-PAC contributed to candidate Albert Gore, Jr., Friends

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of Albert Gore, Jr. Committee and its treasurer, for the 1984 general election, in the following amounts:

| <u>Date Contributed</u> | <u>Amount</u>      | <u>F.E.C. Microfilm Locations</u> |
|-------------------------|--------------------|-----------------------------------|
| 11/17/83                | \$ 200.00          | 8303-289-4364                     |
| 12/30/83                | \$ 800.00          | 8402-003-1767*                    |
| 08/22/84                | \$ <u>5,000.00</u> | 8403-329-3194                     |

Total = \$ 6,000.00

\*Itemized receipt; not reported by ACTWU-PAC.

28. A running total of the amount of contributions contributed to Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer would have put ACTWU-PAC on notice that it contributed \$200.00 (TWO HUNDRED DOLLARS) on November 13, 1983. On that date, ACTWU-PAC and its treasurer were only permitted to make an additional contribution of \$4,800.00 (FORTY-EIGHT HUNDRED DOLLARS). In violation of 2 U.S.C. § 441a(a)(2)(A), it made additional contributions and thereby exceeded the maximum \$5,000.00 (FIVE THOUSAND DOLLARS) the statute permits.

VIII. VIOLATIONS OF THE F.E.C.A.  
BY  
AMALGAMATED TRANSIT UNION-COPE  
IN  
1984 FEDERAL GENERAL ELECTION

29. 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 ATU-COPE knowingly contributed to candidate for public office, Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, in violation of 2 U.S.C. § 441a(a)(2)(A), contributions designated

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for the 1984 federal general election in the amount of \$6,000.00 (SIX THOUSAND DOLLARS).

30. ATU-COPE candidate Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer, for the 1984 general election, in the following amounts:

| <u>Date Contributed</u> | <u>Amount</u> | <u>F.E.C. Microfilm Locations</u> |
|-------------------------|---------------|-----------------------------------|
| 10/27/83                | \$ 500.00     | 8303-287-2494                     |
| 11/15/83                | \$ 1,000.00   | 8303-289-0244                     |
| 02/28/84                | \$ 500.00     | 8403-299-1009                     |
| 05/23/84                | \$ 500.00     | 8403-317-3550                     |
| 05/25/84                | \$ 1,000.00   | 8403-317-3553                     |
| 09/05/84                | \$ 2,500.00   | 8403-343-2254                     |
| Total =                 | \$ 6,000.00   |                                   |

31. A running total of the amount of contributions made to Albert Gore, Jr., Friends of Albert Gore, Jr. Committee and its treasurer by ATU-COPE and its treasurer would have put it on notice that they had contributed \$3,500.00 (THREE THOUSAND FIVE HUNDRED DOLLARS) on May 25, 1984. On that date, ATU-COPE and its treasurer were only permitted to make an additional contribution of \$1,500.00 (ONE THOUSAND FIVE HUNDRED DOLLARS). In violation of 2 U.S.C. § 441a(a)(2)(A), they made additional contributions and thereby exceeded the maximum \$5,000.00 (FIVE THOUSAND DOLLARS) the statute permits them to accept.

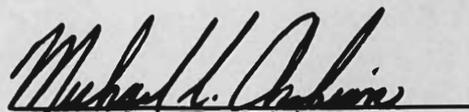
IX. CONCLUSION

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

33. Complainant requests that an investigation into this complaint be undertaken, that Respondents be ordered to return the accepted excess contributions.

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34. Complainant also requests that civil sanctions be imposed on the Respondents as well as a fine equal to the statutory violation, i.e., \$7,000.00 for the recipient committee, \$5,000.00 for SPAD, \$1,000.00 for ACTWU-PAC, and \$1,000.00 for ATU-COPE.



Michael E. Avakian  
Center on National Labor  
Policy, Inc.  
5211 Port Royal Rd., Suite 400  
North Springfield, VA 22151  
(703) 321-9180

Attorney for Complainant

March 1, 1988

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**DESIGNATION OF COUNSEL**

I, Ray O. Brooks, Jr., 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.

February 3, 1988  
Date

Ray O. Brooks Jr.  
Complainant

**DESIGNATED COUNSEL**

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

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**VERIFICATION OF CITIZEN COMPLAINANT**

County of Knox            )  
                                  )  
State of Tennessee        )        ss.

Pursuant to 2 U.S.C. § 437g(a)(1), I, Ray O. Brooks, Jr., being 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 Tennessee.

Ray O. Brooks Jr.

Subscribed and sworn to before me this 3 day of February 1988.

Michael R. Sharp  
Notary Public

My Commission Expires: 3/21/89

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 8, 1988

Mr. Michael Ernest Avakian  
Center On National Labor  
Policy  
Suite 400  
5211 Port Royal Road  
North Springfield, VA 22151

RE: MUR 2584

Dear Mr. Avakian:

This letter acknowledges receipt of your client's complaint, received on March 1, 1988, alleging possible violations of the Federal Election Campaign Act of 1971, as amended (the "Act"), by Senator Albert Gore, Jr., Friends Of Albert Gore, Jr. and William P. Puryear as treasurer, the Amalgamated Transit Union- COPE Account Voluntary Fund and Raymond C. Wallace as treasurer, the Amalgamated Transit Union- COPE and Raymond C. Wallace as treasurer, the Amalgamated Clothing & Textile Workers Union, the Seafarers Political Action Donation and Marianne Rogers as treasurer, and the Amalgamated Clothing and Textile Workers Union- Political Action Committee and Charles Sallee as treasurer. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 2584. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints. If you have any questions, please contact Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble  
General Counsel

By: Lois G. Lerner  
Associate General Counsel

Enclosure  
Procedures

cc: Mr. Ray O. Brooks, Jr.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 8, 1988

Charles Sallee, Treasurer  
Amalgamated Clothing and Textile  
Workers Union- Political  
Action Committee  
15 Union Square  
New York, NY 10003

RE: MUR 2584  
Amalgamated Clothing  
and Textile Workers  
Union- Political  
Action Committee  
Charles Sallee, as  
Treasurer

Dear Mr. Sallee:

The Federal Election Commission received a complaint which alleges that the Amalgamated Clothing and Textile Workers Union- Political Action Committee and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2584. 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 and the Amalgamated Clothing and Textile Workers Union- Political Action Committee in this matter. 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. Your response, which should be addressed to the General Counsel's Office, 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.

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 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 authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel



By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

88040703797



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 8, 1988

Marianne Rogers, Treasurer  
Seafarers Political Activity  
Donation  
5201 Auth Way  
Camp Springs, MD 20746

RE: MUR 2584  
Seafarers Political  
Activity Donation  
Marianne Rogers, as  
Treasurer

Dear Ms. Rogers:

The Federal Election Commission received a complaint which alleges that the Seafarers Political Activity Donation and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2584. 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 and the Seafarers Political Activity Donation in this matter. 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. Your response, which should be addressed to the General Counsel's Office, 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.

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 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 authorizing such counsel to receive any notifications and other communications from the Commission.

88040703798

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel



By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

88040703799



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 8, 1988

Amalgamated Clothing and Textile  
Workers Union  
15 Union Square  
New York, NY 10003

RE: MUR 2584  
Amalgamated Clothing  
and Textile Workers  
Union

Gentlemen:

The Federal Election Commission received a complaint which alleges that the Amalgamated Clothing and Textile Workers Union may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2584. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Amalgamated Clothing and Textile Workers Union in this matter. 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. Your response, which should be addressed to the General Counsel's Office, 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.

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 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 authorizing such counsel to receive any notifications and other communications from the Commission.

88040703800

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel



By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

88040703801



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 8, 1988

Raymond C. Wallace, Treasurer  
Amalgamated Transit Union- COPE  
5025 Wisconsin Avenue, NW  
Washington, DC 20016

RE: MUR 2584  
Amalgamated Transit  
Union- COPE  
Robert C. Wallace, as  
Treasurer

Dear Mr. Wallace:

The Federal Election Commission received a complaint which alleges that the Amalgamated Transit Union- COPE and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2584. 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 and the Amalgamated Transit Union- COPE in this matter. 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. Your response, which should be addressed to the General Counsel's Office, 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.

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 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 authorizing such counsel to receive any notifications and other communications from the Commission.

88040703802

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel



By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 8, 1988

Senator Albert Gore, Jr.  
United States Senate  
Washington, DC 20510

RE: MUR 2584  
Senator Albert Gore,  
Jr.

Dear Senator Gore:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2584. 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. 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. Your response, which should be addressed to the General Counsel's Office, 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.

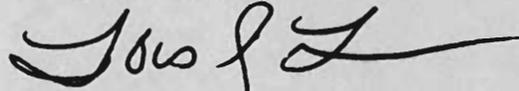
This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

98040703804

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel



By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

88040703805



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 8, 1988

William P. Puryear, Treasurer  
Friends Of Albert Gore, Jr.  
10th Floor  
Third National Bank Building  
Nashville, TN 37219

RE: MUR 2584  
Friends Of Albert  
Gore, Jr.  
William P. Puryear, as  
Treasurer

Dear Mr. Puryear:

The Federal Election Commission received a complaint which alleges that Friends Of Albert Gore, Jr. and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2584. 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 and Friends Of Albert Gore, Jr. in this matter. 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. Your response, which should be addressed to the General Counsel's Office, 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.

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 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 authorizing such counsel to receive any notifications and other communications from the Commission.

88040703806

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel



By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

88040703807



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 8, 1988

Raymond C. Wallace, Treasurer  
Amalgamated Transit Union- COPE  
Account Voluntary Fund  
5025 Wisconsin Avenue, NW  
Washington, DC 20016

RE: MUR 2584  
Amalgamated Transit  
Union- COPE Account  
Voluntary Fund  
Robert C. Wallace, as  
Treasurer

Dear Mr. Wallace:

The Federal Election Commission received a complaint which alleges that the Amalgamated Transit Union- COPE Account Voluntary Fund and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2584. 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 and the Amalgamated Transit Union- COPE in this matter. 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. Your response, which should be addressed to the General Counsel's Office, 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.

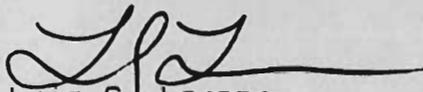
This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

88040703808

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
General Counsel

  
By: Lois G. Lerner  
Associate General Counsel

Enclosures

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

88040703809

60-48249

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM



**AMALGAMATED TRANSIT UNION** 88 MAR 22 PM 12: 39

5025 WISCONSIN AVE., N.W. WASHINGTON, D.C. 20016-4139 (202) 537-1645

March 18, 1988

Sandra Robinson, Esq.  
General Counsel's Office  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

RE: F.E.C. MUR 2584  
Amalgamated Transit Union - COPE  
Raymond C. Wallace, Treasurer

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FEDERAL ELECTION COMMISSION  
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Dear Ms. Robinson:

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 March 8, 1988, 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, F.E.C. MUR 2584, alleges that the Respondent political committee and its Treasurer violated Section 441(a)(2)(A) of the Act by making contributions to the "Friends of Albert J. Gore, Jr.", Committee for the 1984 Federal General Election in the amount of \$6,000.00 exceeding the \$5,000.00 per election limitation in the Act by \$1,000.00.

We submit, as demonstrated herein, that respondents contributions to the Friends of Albert J. Gore, Jr., committee ("Committee") did not exceed the \$5,000.00 contribution per election limitation of the Act.

As referenced in the complaint, in 1983, and 1984, Respondents distributed five (5) separate contributions to the Committee. A \$500.00 contribution was distributed on October 27, 1983 and reported by the Committee on November 1, 1983. A second \$1,000.00 contribution was distributed on November 15, 1983, and reported by the Committee on November 21, 1983. A third contribution for \$500.00 was distributed on February 28, 1984, and reported by the Committee on March 20, 1984. A fourth contribution for \$1,500.00 was distributed on May 23, 1984 and reported by the Committee on June 25, 1984. Finally, a \$2,500.00 contribution was distributed on September 5, 1984, and reported by the Committee on September 11, 1984. Copies



of Respondents' original monthly F.E.C. reports listing these campaign contributions are attached hereto as Exhibits A-E. Included in each exhibit are copies of the cancelled checks returned by the Committee.

Pursuant to Respondents' regular operating procedures, 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 contributions for either the primary or general elections. A copy of the ATU-COPE cover letter used at that time is attached hereto as Exhibit F. Copies of the actual letters sent with the individual contributions were not kept in our files.

The Tennessee primary in 1984, was held on August 2, 1984. The two 1983 contributions and all but the September 5, 1984 contributions were distributed to the Committee prior to the primary and intended as primary campaign contributions. However, through an inadvertent error in our bookkeeping, which has since been corrected, our F.E.C. reports covering those periods incorrectly reported all of the contributions as targeted for the general election. Therefore, rather than recording \$3,500.00 for the primary election campaign and the last \$2,500.00 check for the general election, our records inadvertently show \$6,000.00 in contributions ear-marked for the general election.

Clearly, it was our intent not to exceed the limits prescribed by the Act. Rather, Respondents contributions were timed to provide \$3,500.00 for the primary election and a final \$2,500.00 for the general election. Attached hereto as Exhibit G are copies of our amended F.E.C. reports for the periods in questions, which accurately designate the contributions to the appropriate election campaign. The original documents of the amended reports are simultaneously being filed with the F.E.C.

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

As your investigation will establish, although Respondents F.E.C. reports for the contributions in question incorrectly reported all of the contributions as being for the 1984 general election, those same contributions were correctly reported by Committee. Further, as Respondents' standard cover letters, then in use, and checks did not designate the specific election for which the contributions were being forwarded, the provisions of 11 C.F.R. Section 110.2 (b)(2)ii provide that contributions not designated in writing for a specific election received by the Committee prior to the primary be credited for the primary and not the general election. (For your reference, in 1983 and 1984 the language

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noted above was set forth in 11 C.F.R. Sections 110.1(a)(2)11(A).)

In light of the above, we respectfully request that no further action be taken by the Commission, that the complaint be dismissed and the file closed on these instant matters.

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.

/rfm  
Enclosures

cc: Jim La Sala  
International President  
Amalgamated Transit Union

Raymond C. Wallace  
International Secretary-Treasurer  
Amalgamated Transit Union

Don Simon, Esq.  
Sonosky, Chambers and Satche  
Suite 1000  
1250 Eye Street, N.W.  
Washington, D.C. 20005

88040703812

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2584

NAME OF COUNSEL: Robert A. Molofsky

ADDRESS: Amalgamated Transit Union  
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.

March 18, 1988  
Date

R. C. Wallace  
Signature

RESPONDENT'S NAME: Raymond C. Wallace  
Treasurer, ATU-COPE

ADDRESS: Amalgamated Transit Union

5025 Wisconsin Avenue, N.W.

Washington, D.C. 20016

HOME PHONE: \_\_\_\_\_

BUSINESS PHONE: (202) 537-1645

88040703813

Exhibit A



# Amalgamated Transit Union

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

Office of the International Secretary-Treasurer

November 17, 1983

88040703814

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

Gentlemen:

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

Also enclosed are amended reports for January through  
September of 1983.

Trusting this meets with your satisfaction, I remain

Sincerely,

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

:ngl

Enclosure

(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 20015

Check here if address is different than previously reported.

FEC Identification Number

C00032995

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 10/1/83 - 10/31/83

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 10/1/83 through 10/31/83

6. (a) Cash on hand January 1, 19 83 ..... \$ 43,479.18

(b) Cash on Hand at Beginning of Reporting Period ..... \$ 134,281.09

(c) Total Receipts (from Line 18) ..... \$ 12,488.59 \$ 123,580.50

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) ..... \$ 146,769.68 \$ 167,059.68

7. Total Disbursements (from Line 28) ..... \$ 8,436.00 \$ 28,726.00

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) ..... \$ 138,333.68 \$ 138,333.68

9. Debts and Obligations Owed TO The Committee ..... \$ NONE  
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee ..... \$ NONE  
(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.

R.C. Wallace

Type or Print Name of Treasurer

*R.C. Wallace*  
SIGNATURE OF TREASURER

11/17/83  
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.

**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 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------------|
| Lowry for U.S. Senate<br>Thomas D. Wimmer, Treasurer<br>P.O. Box 4246<br>Seattle, WA 98104                                                              | <b>Election</b>                                                                                                                             | 10/27/83                | \$ 1,000.00                             |
|                                                                                                                                                         | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| B. Full Name, Mailing Address and ZIP Code<br>Friends of Albert Gore, Jr.<br>P.O. Box 3000<br>Nashville, TN 37219                                       | <b>Re-election</b>                                                                                                                          | 10/27/83                | \$ 500.00                               |
|                                                                                                                                                         | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| C. Full Name, Mailing Address and ZIP Code<br>Kostmayer for Congress<br>P.O. Box 1351<br>Boylestown, PA 18901                                           | <b>Re-election</b>                                                                                                                          | 10/27/83                | \$ 500.00                               |
|                                                                                                                                                         | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| D. Full Name, Mailing Address and ZIP Code<br>Kaptur for Congress Committee<br>& Deborah Auger<br>7040 Knighthood Lane<br>Columbia, MD 21045            | <b>Re-election</b>                                                                                                                          | 10/27/83                | \$ 250.00                               |
|                                                                                                                                                         | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| E. Full Name, Mailing Address and ZIP Code<br>Committee to Reelect LaFalce<br>P.O. Box 2884<br>Washington, DC 20013                                     | <b>Re-election</b>                                                                                                                          | 10/27/83                | \$ 250.00                               |
|                                                                                                                                                         | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| F. Full Name, Mailing Address and ZIP Code<br>People for Mrazek<br>P.O. Box 303<br>Centerport, NY 11721                                                 | <b>Re-election</b>                                                                                                                          | 10/27/83                | \$ 500.00                               |
|                                                                                                                                                         | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| G. Full Name, Mailing Address and ZIP Code<br>Rinaldo for Congress Committee<br>Watergate South<br>700 New Hampshire Ave., N.W.<br>Washington, DC 20037 | <b>Re-election</b>                                                                                                                          | 10/27/83                | \$ 250.00                               |
|                                                                                                                                                         | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| H. Full Name, Mailing Address and ZIP Code<br>Hughes for Congress<br>59 G Street, S.W.<br>Washington, DC 20024                                          | <b>Re-election</b>                                                                                                                          | 10/27/83                | \$ 250.00                               |
|                                                                                                                                                         | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| I. Full Name, Mailing Address and ZIP Code<br>Friends of Senator Carl Levin<br>420 C Street, N.E.<br>Washington, DC 20002                               | <b>Re-election</b>                                                                                                                          | 10/27/73                | \$ 500.00                               |
|                                                                                                                                                         | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |

SUBTOTAL of Disbursements This Page (optional) ..... 4,000.00

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

AMALGAMATED TRANSIT UNION  
COPE ACCOUNT—VOLUNTARY FUND  
5025 WISCONSIN AVENUE, N.W.  
WASHINGTON, D.C. 20016

No. 1028

October 27 1983 15-59 10:540



PAY TO THE  
ORDER OF

Friends of Albert Gore

\$ 500.00

Five Hundred & 00/100

08 DOLLARS

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

*John S. ...*  
INTERNATIONAL PRESIDENT  
*R.C. ...*  
INTERNATIONAL SECRETARY-TREASURER

⑆0540⑉0055⑆ 09⑈862 74 875⑈ ⑆0000050000⑆



Exhibit B

# Amalgamated Transit Union

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

Office of the International Secretary-Treasurer

December 12, 1983

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

Gentlemen:

Enclosed please find the November 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

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(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 11/1/83 - 11/30/83
- 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 11/1/83 through 11/30/83

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

B.C. Wallace  
Type or Print Name of Treasurer

B.C. Wallace  
SIGNATURE OF TREASURER

12/12/83

Date

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

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

FEC FORM 3X (3/80)

**ITEMIZED DISBURSEMENTS**

(Use separate sheet 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**

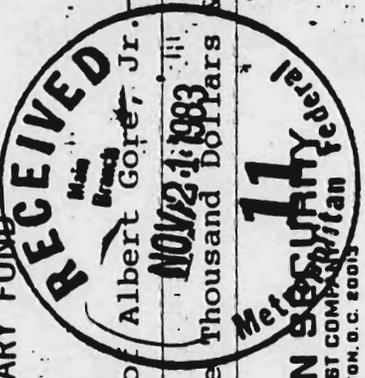
| A. Full Name, Mailing Address and ZIP Code                                                                                                      | Purpose of Disbursement                                                                                                                                    | Date (month, day, year) | Amount of Each Disbursement This Period |
|-------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------------|
| Tsongas for Senate Committee<br>420 C Street, N.W.<br>Washington, DC 20001                                                                      | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 11/3/83                 | \$ 500.00                               |
| B. Full Name, Mailing Address and ZIP Code<br>Ferraro for Congress, 1978<br>218 Lafayette Street<br>New York, NY 10012                          | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 11/3/83                 | 250.00                                  |
| C. Full Name, Mailing Address and ZIP Code<br>Torricelli for Congress<br>411 Washington Boulevard<br>Arlington, VA 22201                        | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 11/3/83                 | 500.00                                  |
| D. Full Name, Mailing Address and ZIP Code<br>Dürbin for Congress<br>P.O. Box 2345<br>Washington, DC 20013                                      | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 11/3/83                 | 250.00                                  |
| E. Full Name, Mailing Address and ZIP Code<br>Committee to Reelect Joe Kolter<br>P.O. Box 77002<br>Washington, DC 20013                         | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 11/8/83                 | 200.00                                  |
| F. Full Name, Mailing Address and ZIP Code<br>Friends of Albert Gore, Jr.<br>Jack Wright Robinson, Treasurer<br>Rt. 2<br>Carthage, TN 37030     | Election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify):    | 11/15/83                | 1,000.00                                |
| G. Full Name, Mailing Address and ZIP Code<br>Friends of Lane Evans<br>P.O. Box 1222<br>Rock Island, IL 61201                                   | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 11/21/83                | 200.00                                  |
| H. Full Name, Mailing Address and ZIP Code<br>Friends of Neal Smith Committee<br>5850 N.E. 12th Avenue<br>Rural Route #2<br>Altoona, Iowa 50009 | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 11/21/83                | 250.00                                  |
| I. Full Name, Mailing Address and ZIP Code<br>Citizens for D'Amours<br>& Robert Walsh<br>922 Elm Street<br>Manchester, NJ 03101                 | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 11/21/83                | 1,000.00                                |
| SUBTOTAL of Disbursements This Page (optional!)                                                                                                 |                                                                                                                                                            |                         | \$ 4,150.00                             |
| TOTAL This Period (last page this line number only)                                                                                             |                                                                                                                                                            |                         |                                         |

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AMALGAMATED TRANSIT UNION  
COPE ACCOUNT—VOLUNTARY FUND  
5025 WISCONSIN AVENUE, N.W.  
WASHINGTON, D.C. 20016

No. 1036

November 15 1983 15-55  
1540



PAY TO THE ORDER OF Friends of Albert Gore, Jr. \$ 1,000.00

One Thousand Dollars 00/100 DOLLARS

*John Rowland*  
INTERNATIONAL PRESIDENT  
*R.C. Wallace*  
INTERNATIONAL SECRETARY-TREASURER

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

⑆0540⑉0055⑆ 09⑈862 74 875⑈ ⑆0000100000⑆



Exhibit C

# Amalgamated Transit Union

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

Office of the International Secretary-Treasurer

March 9, 1984

8  
8  
3  
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7  
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8  
2  
2

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

Gentlemen:

Enclosed please find the February 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

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, D.C. 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 2/1/84 - 2/29/84  
 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 2/1/84 through 2/29/84

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<br>This Period | COLUMN B<br>Calendar Year-to-Date |
|------------------------------------------------------------------------------------------|-------------------------|-----------------------------------|
| 8. (a) Cash on hand January 1, 19 84 .....                                               |                         | \$ 156,011.02                     |
| (b) Cash on Hand at Beginning of Reporting Period .....                                  | \$ 160,383.68           |                                   |
| (c) Total Receipts (from Line 18) .....                                                  | \$ 13,826.55            | \$ 27,549.21                      |
| (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | \$ 174,210.23           | \$ 183,560.23                     |
| 7. Total Disbursements (from Line 28) .....                                              | \$ 15,950.00            | \$ 25,300.00                      |
| 8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) .....      | \$ 158,260.23           | \$ 158,260.23                     |
| 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 202-523-4068

R.C. Wallace

Type or Print Name of Treasurer

R.C. Wallace

SIGNATURE OF TREASURER

3/9/84

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.

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)

**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 |
|------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------------|
| Annunzio for People Committee<br>P.O. Box 15185<br>Washington, DC 20003                                                            | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 2/28/84                 | \$ 250.00                               |
| B. Full Name, Mailing Address and ZIP Code<br>Friends of Albert Gore, Jr.<br>P.O. Box 3000<br>Nashville, TN 37219                  | election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify):    | 2/28/84                 | 500.00                                  |
| C. Full Name, Mailing Address and ZIP Code<br>Foglietta "84 Campaign<br>737 South 8th Street<br>Philadelphia, PA 19147             | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 2/28/84                 | 500.00                                  |
| D. Full Name, Mailing Address and ZIP Code<br>Committee to Re-Elect Harold Ford<br>P.O. Box 7365<br>Washington, D C 20044          | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 2/28/84                 | 500.00                                  |
| E. Full Name, Mailing Address and ZIP Code<br>Jon Hunt Committee<br>P.O. Box 25937<br>Raleigh, NC 27611                            | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                | 2/28/84                 | 1,500.00                                |
| F. Full Name, Mailing Address and ZIP Code<br>Wyden for Congress<br>P.O. Box 12473<br>Portland, OR 97212                           | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 2/28/84                 | 250.00                                  |
| G. Full Name, Mailing Address and ZIP Code<br>Bruce A. Morrison For Congress Committee<br>P.O. Box 303<br>New Haven, CT 06503-0303 | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 2/28/84                 | 500.00                                  |
| H. Full Name, Mailing Address and ZIP Code<br>Stevens for Senate Committee<br>202 E Street, N.E.<br>Washington, D.C. 20002         | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 2/28/84                 | 500.00                                  |
| I. Full Name, Mailing Address and ZIP Code<br>Guarini for Congress<br>P.O. Box J-29<br>Jersey City, NJ 07306                       | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 2/28/84                 | 250.00                                  |
| SUBTOTAL of Disbursements This Page (optional) .....                                                                               |                                                                                                                                                            |                         | \$ 4,750.00                             |
| TOTAL This Period (last page this line number only) .....                                                                          |                                                                                                                                                            |                         |                                         |

8 8 0 4 0 7 0 3 8 2 5

AMALGAMATED TRANSIT UNION  
COPE ACCOUNT—VOLUNTARY FUND  
5025 WISCONSIN AVENUE, N.W.  
WASHINGTON, D.C. 20016

No. 1107

15-55  
540

Feb. 28 19 84

\$ 500.00

DOLLARS

PAY TO THE ORDER OF Friends of Albert E. Coffey Jr.

Five Hundred Dollars

REC'D  
MAR 20 1984  
AMERICAN SECURITY

AMERICAN SECURITY  
AND TRUST COMPANY  
WASHINGTON, D.C.

*John S. ...*  
INTERNATIONAL PRESIDENT  
*R.C. ...*  
INTERNATIONAL SECRETARY-TREASURER

⑆0000050000⑆  
⑆09⑈862 74 875⑆

Exhibit D



# Amalgamated Transit Union

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

Office of the International Secretary-Treasurer

June 13, 1984

88040703826

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

Gentlemen:

Enclosed please find the May 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

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 5/1/84 - 5/31/84

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 5/1/84 through 5/31/84

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.

R.C. Wallace

Type or Print Name of Treasurer

6/13/84

SIGNATURE OF TREASURER

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 3e are obsolete and should no longer be used.

FEC FORM 3X (3/80)

**SCHEDULE B**

**UNIONIZED DISBURSEMENTS**

Page 1 of 21 for  
**LINE NUMBER 21**  
 (Use separate schedules 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**

| A. Full Name, Mailing Address and ZIP Code                                                                                                                     | Purpose of Disbursement                                                                                                                     | Date (month, day, year) | Amount of Each Disbursement This Period |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------------|
| Kaptur for Congress<br>1841 Dority Boulevard<br>Toledo, OH 43615                                                                                               | Re-election                                                                                                                                 | 5/07/84                 | \$ 500.00                               |
|                                                                                                                                                                | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| B. Full Name, Mailing Address and ZIP Code<br>Romaneli for State Senate Com.<br>P.O. Box 4290<br>Pittsburgh, PA 15203                                          | Re-election                                                                                                                                 | 5/22/84                 | 200.00                                  |
|                                                                                                                                                                | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| C. Full Name, Mailing Address and ZIP Code<br>Michlovic for Legislator Com.<br>515 Verona Street<br>North Braddock, PA 15104                                   | Re-election                                                                                                                                 | 5/22/84                 | 200.00                                  |
|                                                                                                                                                                | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| D. Full Name, Mailing Address and ZIP Code<br>Friends of Senator Carl Levin<br>& Pearl Lipner, Treasurer<br>29201 Telegraph - Ste. 606<br>Southfield, MI 48034 | Re-election                                                                                                                                 | 5/23/84                 | 1,500.00                                |
|                                                                                                                                                                | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| E. Full Name, Mailing Address and ZIP Code<br>Reelect Senator Pell Committee<br>& Boland Berardo, Treasurer<br>P.O. Box 1984<br>Providence, RI 02903           | Re-election                                                                                                                                 | 5/23/84                 | 500.00                                  |
|                                                                                                                                                                | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| F. Full Name, Mailing Address and ZIP Code<br>Friends of Jay Rockefeller<br>& Russell S. Wehrle, Treasurer<br>P.O. Box 840<br>Charleston, WV 25323             | Re-election                                                                                                                                 | 5/23/84                 | 500.00                                  |
|                                                                                                                                                                | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| G. Full Name, Mailing Address and ZIP Code<br>Friends of Albert Gore, Jr.<br>& Jack Wright Robinson<br>P.O. Box 2757<br>Nashville, TN 37219                    | Re-election                                                                                                                                 | 5/23/84                 | 500.00                                  |
|                                                                                                                                                                | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| H. Full Name, Mailing Address and ZIP Code<br>Lloyd Doggett Campaign Fund<br>1206 San Antonio<br>Austin, TX 78701                                              | Re-election                                                                                                                                 | 5/23/84                 | 1,000.00                                |
|                                                                                                                                                                | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| I. Full Name, Mailing Address and ZIP Code<br>Stan Lundine for Congress<br>P.O. Box 2884<br>Washington, DC 20013                                               | Re-election                                                                                                                                 | 5/23/84                 | 500.00                                  |
|                                                                                                                                                                | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |

SUBTOTAL of Disbursements This Page (optional) ..... 5,400.00

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

ITEMIZED DISBURSEMENTS

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

Committee (in Full)

RELATED TRANSIT UNION - COPE

| Name, Mailing Address and ZIP Code                                                                         | Purpose of Disbursement                                                                                                                                    | Date (month, day, year) | Amount of Each Disbursement This Period |
|------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------------|
| Committee<br>Box 1492<br>Harrisonburg, VA 23187                                                            | Purpose of Disbursement                                                                                                                                    | 5/23/84                 | \$ 500.00                               |
|                                                                                                            | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                |                         |                                         |
| Committee for Congress<br>Richard Daney, Treasurer<br>1000 King Street<br>Wilmington, DE 19801             | Purpose of Disbursement                                                                                                                                    | 5/23/84                 | 500.00                                  |
|                                                                                                            | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| Committee to elect Schwerdtfeger<br>N. Howarth, Treasurer<br>Box 275<br>Bethel, IL 61028                   | Purpose of Disbursement                                                                                                                                    | 5/23/84                 | 500.00                                  |
|                                                                                                            | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                |                         |                                         |
| Committee for Congress<br>Marie Welch<br>Paseo, Suite C<br>St. Louis City, MO 64108                        | Purpose of Disbursement                                                                                                                                    | 5/23/84                 | 1,000.00                                |
|                                                                                                            | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| Committee - '84 Relection Committee<br>Francis Jones<br>100 Guyvesant Avenue<br>Brooklyn, NY 11233         | Purpose of Disbursement                                                                                                                                    | 5/23/84                 | 500.00                                  |
|                                                                                                            | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| Committee for Congress<br>St. Monica<br>St. Louis, MO 63074                                                | Purpose of Disbursement                                                                                                                                    | 5/24/84                 | 200.00                                  |
|                                                                                                            | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| Committee of Pat and Joe<br>100 Park Street<br>Providence, RI 20908                                        | Purpose of Disbursement                                                                                                                                    | 5/24/84                 | 50.00                                   |
|                                                                                                            | Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input checked="" type="checkbox"/> Other (specify):                |                         |                                         |
| Committee of Albert Gore, Jr.<br>Mark Wright Robinson<br>Box 2757<br>Memphis, TN 37219                     | Purpose of Disbursement                                                                                                                                    | 5/25/84                 | 1,000.00                                |
|                                                                                                            | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| Committee of Les AuCoin<br>Anton W. Cook, Treasurer.<br>100 S.W. Fifth Avenue, #2000<br>Portland, OR 97204 | Purpose of Disbursement                                                                                                                                    | 5/25/84                 | 500.00                                  |
|                                                                                                            | Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |

TOTAL of Disbursements This Page (optional) ..... \$ 4,750.00

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

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AMALGAMATED TRANSIT UNION  
COPE ACCOUNT—VOLUNTARY FUND  
5025 WISCONSIN AVENUE, N.W.  
WASHINGTON, D.C. 20016

No. 1246

May 23 19 84 15-55 540

PAY TO THE ORDER OF

Friends of Albert Gore, Jr.

\$ 1,500.00

One Thousand Five Hundred Dollars & 00/100

DOLLARS

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

*John S. ...*  
INTERNATIONAL PRESIDENT  
*R.C. ...*  
INTERNATIONAL SECRETARY-TREASURER

⑆0540⑉0055⑆ 09⑈862 74 875⑈ ⑆0000150000⑆

Exhibit E



# 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

8 8 0 4 0 7 0 3 8 3 1

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)

(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

5. Covering Period 9-1-84 through 9-30-84

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<br>This Period | COLUMN B<br>Calendar Year-to-Date |
|-------------------------------------------------------------------------------------------|-------------------------|-----------------------------------|
| 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 3a are obsolete and should no longer be used.

FEC FORM 3X (3/80)

Any information on this form may not be used by any person for the purpose of soliciting contributions or for 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 |
|------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------------|
| Friends of Albert Gore, Jr.<br>Jack Wright Robinson, Treasurer<br>P.O. Box 2757<br>Nashville, TN 37219           | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                                           | 9-5-84                  | 2,500.00                                |
| Reelect Senator Pell Committee<br>Roland Berardo, Treasurer<br>P.O. Box 1984<br>Providence, RI 02903             | Purpose of Disbursement<br>Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 9-5-84                  | 1,000.00                                |
| Jim Hunt Committee<br>Maylon E. Little, Treasurer<br>215 Hillsborough Street<br>Raleigh, NC 27611                | Purpose of Disbursement<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                | 9-5-84                  | 1,500.00                                |
| Dismours for Senate Committee<br>Robert M. Walsh, Treasurer<br>1087 Elm Street, Room 408<br>Manchester, NH 03101 | Purpose of Disbursement<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                | 9-5-84                  | 3,000.00                                |
| Friends of Max Baucus<br>Mr. R. Stephen Browning, Treasurer<br>Post Office Box 216<br>Helena, MT 59624           | Purpose of Disbursement<br>Re-election<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 9-5-84                  | 1,000.00                                |
| Winter for Senate Committee<br>James C. Rhoden, Treasurer<br>P.O. Box 23148<br>Jackson, MS 39225                 | Purpose of Disbursement<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                | 9-5-84                  | 3,000.00                                |
| G. Full Name, Mailing Address and ZIP Code                                                                       | Purpose of Disbursement<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                           | Date (month, day, year) | Amount of Each Disbursement This Period |

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

AMALGAMATED TRANSIT UNION  
CCPE ACCOUNT—VOLUNTARY FUND

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

No. 1326

Sept. 5 1984 <sup>15.55</sup>/<sub>340</sub>



PAY TO THE ORDER OF Friends of Albert Gore, Jr. \$ 2,500.00  
Two Thousand Five Hundred Dollars & 00/100 DOLLARS

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

*John Rowland*  
INTERNATIONAL PRESIDENT

*R.C. Wallace*  
INTERNATIONAL SECRETARY-TREASURER

⑆0540⑉0055⑆ 09⑈862 74 875⑈ ⑆0000250000⑆



# Amalgamated Transit Union

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

Office of the International Secretary-Treasurer

88040703835

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



Exh. b. 1 G



# Amalgamated Transit Union

5025 Wisconsin Ave., N.W., Washington, D.C. 20016-4139  
202-537-1645

Office of the International Secretary-Treasurer

March 18, 1988

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

Dear Sir:

A review of our 1983 and 1984 contributions to The Friends of Albert J. Gore, Jr., campaign committee indicates that we inadvertently listed our \$500 October 27, 1983; \$1,000 November 15, 1983; \$500 February 24, 1984 and \$1,500 May 23, 1984 contributions as designated for the 1984 general elections. In fact, these contributions were for the August 2, 1984 primary election.

Accordingly, we hereby resubmit corrected copies of our Schedule B, F.E.C. reports for the months of October and November 1983, and February and May 1984. We respectfully request that your records be amended accordingly. If you should have any questions please feel free to contact my office regarding this matter.

Sincerely,

Raymond C. Wallace  
International Secretary-  
Treasurer  
Treasurer ATU-COPE

/rfm  
Enclosures

cc: Jack Wright Robinson, Treasurer  
Friends of Albert J. Gore, Jr.  
P.O. Box 2757  
Nashville, TN 37219

88040703836

(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 20015**

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 10/1/83 - 10/31/83  
 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      | COLUMN B              |
|-------------------------------------------------------------------------------------------|--------------------------|---------------|-----------------------|
|                                                                                           |                          | This Period   | Calendar Year-to-Date |
| 5. Covering Period                                                                        | 10/1/83 through 10/31/83 |               |                       |
| 6. (a) Cash on hand January 1, 1983                                                       |                          |               | \$ 43,479.18          |
| (b) Cash on Hand at Beginning of Reporting Period                                         |                          | \$ 134,281.09 |                       |
| (c) Total Receipts (from Line 18)                                                         |                          | \$ 12,488.59  | \$ 123,580.50         |
| (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)  |                          | \$ 146,769.68 | \$ 167,059.68         |
| 7. Total Disbursements (from Line 28)                                                     |                          | \$ 8,436.00   | \$ 28,726.00          |
| 8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))             |                          | \$ 138,333.68 | \$ 138,333.68         |
| 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.

R.C. Wallace  
Type or Print Name of Treasurer

R.C. Wallace  
SIGNATURE OF TREASURER

11/17/83  
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.

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

88040703838

| A. Full Name, Mailing Address and ZIP Code                          | Purpose of Disbursement                                                                                                                                    | Date (month, day, year) | Amount of Each Disbursement This Period |
|---------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------------|
| Friends of Albert Gore, Jr.<br>P.O. Box 3000<br>Nashville, TN 37219 | Re-Election<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)  | 10/27/83                | \$500.00                                |
| B. Full Name, Mailing Address and ZIP Code                          | Purpose of Disbursement<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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) ..... |  |

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

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 11/1/83 - 11/30/83
- 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

3. Covering Period 11/1/83 through 11/30/83

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

P.C. Wallace  
Type or Print Name of Treasurer

P.C. Wallace  
SIGNATURE OF TREASURER

12/12/83  
Date

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

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

FEC FORM 3X (3/80)

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Primary Page

PAGE      OF       
FOR LINE NUMBER

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**

0  
4  
8  
3  
0  
7  
0  
4  
0  
8  
8

| A. Full Name, Mailing Address and ZIP Code                                                 | Purpose of Disbursement                                                                                                                                    | Date (month, day, year) | Amount of Each Disbursement This Period |
|--------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------------|
| Friends of Albert Gore, Jr.<br>Jack Wright Robins, Treasurer<br>Rt 2<br>Carthage, TN 37030 | Election<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)     | 11/15/83                | 1,000.00                                |
| B. Full Name, Mailing Address and ZIP Code                                                 | Purpose of Disbursement<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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) ..... |  |

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, D.C. 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 2/1/84 - 2/29/84
- 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 2/1/84 through 2/29/84

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

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

(c) Total Receipts (from Line 1B) .....

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

7. Total Disbursements (from Line 2B) .....

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

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

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

|      | COLUMN A<br>This Period | COLUMN B<br>Calendar Year-to-Date |
|------|-------------------------|-----------------------------------|
| 6(a) |                         | \$ 156,011.02                     |
| 6(b) | \$ 160,383.68           |                                   |
| 6(c) | \$ 13,826.55            | \$ 27,549.21                      |
| 6(d) | \$ 174,210.23           | \$ 183,560.23                     |
| 7    | \$ 15,950.00            | \$ 25,300.00                      |
| 8    | \$ 158,260.23           | \$ 158,260.23                     |
| 9    | \$ NONE                 |                                   |
| 10   | \$ 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

3/9/84  
Date

For further information contact:

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

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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 |
|---------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------------|
| Friends of Albert Gore, Jr.<br>P.O. Box 3000<br>Nashville, eN 37219 | Election<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify) | 02/28/84                | \$500.00                                |
| 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<br><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<br><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<br><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<br><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<br><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<br><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<br><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<br><input type="checkbox"/> Other (specify)                        |                         |                                         |

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

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

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 5/1/84 - 5/31/84, Twelfth day report preceding 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 5/1/84 through 5/31/84

Table with 3 columns: Description, COLUMN A This Period, COLUMN B Calendar Year-to-Date. Rows include Cash on hand, Receipts, Disbursements, and Debts.

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

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4068

6/13/84

SIGNATURE OF TREASURER

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.

FEC FORM 3X (3/80)

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

for each category of the Detailed Summary Page

FOR LINE NUMBER

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

| A. Full Name, Mailing Address and ZIP Code                                                      | Purpose of Disbursement                                                                                                                                    | Date (month, day, year) | Amount of Each Disbursement This Period |
|-------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------------|
| Friends of Albert Gore, Jr.<br>c/o Jack Wright Robinson<br>P.O. Box 2757<br>Nashville, TN 37219 | Re-election<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)  | 5/23/84                 | 1,500.00                                |
| B. Full Name, Mailing Address and ZIP Code                                                      | Purpose of Disbursement<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify) | Date (month, day, year) | Amount of Each Disbursement This Period |

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|                                                           |  |
|-----------------------------------------------------------|--|
| SUBTOTAL of Disbursements This Page (optional) .....      |  |
| TOTAL This Period (last page this line number only) ..... |  |

# S.P.A.D.

6CC#8853  
RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

## Seafarers Political Activity Donation

88 MAR 23 AM 10:45

5201 Auth Way, Camp Springs, Maryland 20746 301-899-0675

March 15, 1988

Lois G. Lerner, Esq.  
Associate General Counsel  
Federal Election Commission  
Washington, DC 20463

RE: **MUR 2584**  
**Seafarers Political Activity Donation**  
**Marianne Rogers, as Treasurer**

Dear Ms. Lerner:

Please accept this letter as a formal Statement of Position on behalf of the Seafarers Political Activity Donation (SPAD) the above-captioned matter.

The charging party, Ray O. Brooks, Jr. has alleged that SPAD has violated the Federal Election Campaign Act of 1971 by making excessive donations to the primary election of Albert Gore, Jr. As Treasurer of SPAD, I will demonstrate that the contributions received by Gore were lawful and within the statutory limitations and that there is no basis for this complaint.

On June 29, 1983, SPAD made a donation in the amount of \$5,000 payable to the "Friends of Albert Gore, Jr." The cover letter dated June 30, 1983 enclosed with the check sent to the Friends of Albert Gore, Jr. indicated that check #3149 represented a contribution to Gore's "1984 Primary Election" Campaign. (See SPAD exhibit A attached.)

Subsequently, on December 7, 1983, SPAD made a donation in the amount of \$5,000 payable to "Albert Gore, Jr. for Congress Committee." The cover letter attached indicated that check #3541 represented a contribution to Gore's "1984 General Election Campaign for Congress". (See SPAD exhibit B attached.)

Both these contributions were legal and within the lawful parameters established by the Act. The Federal Election Campaign Act of 1971 permits contributions up to the amount of \$5,000 to any candidate "with respect to any election for

88040703845

88 MAR 23 PM 10:10

RECEIVED  
FEDERAL ELECTION COMMISSION

Lois G. Lerner, Esq.  
March 15, 1988  
Page 2

Federal office..." Under the applicable regulations, a primary election and a general election are considered to be separate "elections" for purposes of the contribution limitation.

On July 18, 1983 SPAD filed its monthly FEC Form 3X with the Commission. On Schedule B (page 11 of 14) item A, SPAD indicated that it made a \$5,000 donation to the "Friends of Albert Gore, Jr." on June 29, 1983. The disbursement box indicated that this donation was intended for the '84 primary. (See SPAD exhibit C.)

On January 30, 1984 SPAD filed another monthly FEC Form 3X report with the Commission. On Schedule B (page 49 of 57) item I, SPAD indicated that it made a \$5,000 donation to "Albert Gore for Congress Committee" on December 7, 1983. The disbursement box for the primary was indicated. (See SPAD exhibit D.)

The notation that the December 7, 1983 donation was for Gore's primary election was a clerical error and SPAD filed an Amended Form 3X report with the Commission.

That amended report was filed by Thomas J. Bovo, Assistant Treasurer on October 9, 1984. On that report (question 4(b)) SPAD indicated that this was an amended report. The October report corrected the error that was made on the previous report filed on January 30, 1984. On the corrected page 49 (of 57) item I, the donation to Albert Gore, Jr. for Congress Committee was modified to show that the disbursement, was made in fact for the '84 general election. (See SPAD exhibit E.)

The evidence submitted demonstrates that at the time SPAD made the donations that it intended to make a \$5,000 donation to Gore's primary election on June 29, 1983 and a \$5,000 donation to Gore's general election on December 7, 1983.

Although SPAD made a clerical error on its reporting form in January 1984, this error was subsequently corrected by SPAD by its filing of an Amended FEC Form 3X on October 9, 1984.

I am confident that the above explanation should be sufficient to establish that SPAD did not make any contributions to Gore during 1983 that exceeded the legal limitations. The enclosed documentation speaks for itself.

83040703846

Lois G. Lerner, Esq.  
March 15, 1988  
Page 3

As a result, this complaint should be dismissed and no adverse action should be taken against SPAD or any of its representatives.

Please do not hesitate to contact me if can provide you with my additional information.

Sincerely,



Marianne Rogers  
Treasurer

MAR/AFF:ald

cc: Sandra Robinson, Esq.

Attachments - EXHIBITS A thru E

8 8 0 4 0 7 0 3 8 4 7

88040703848

EXHIBIT A



88040703850

EXHIBIT B



88040703852

EXHIBIT C

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

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

(Summary Page)

ALIGN AREA  
88 MAR 29 AM 10:46

1 Name of Committee (In Full)

Seafarers Political Activity Donation

Address (Number and Street)

5201 Auth Way

City, State and ZIP Code

Camp Springs, Maryland 20746

Check here if address is different than previously reported.

2 FEC Identification Number

0000 4325

3  This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (Date)

4 TYPE OF REPORT (Check appropriate boxes)

- April 15 Quarterly Report
- July 15 Quarterly Report
- July 31 Mid Year Report (Non Election Year Only)
- Monthly Report for June 1983
- 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 June 1 through June 30, 1983

6 (a) Total 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 (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<br>This Period | COLUMN B<br>Calendar Year-to-Date |
|-------|-------------------------|-----------------------------------|
| 6 (a) | \$                      | \$ 581,871.10                     |
| 6 (b) | \$ 825,834.90           |                                   |
| 6 (c) | \$ 66,085.90            | \$ 438,615.40                     |
| 6 (d) | \$ 891,920.80           | \$ 1,020,486.50                   |
| 7     | \$ 24,550.00            | \$ 153,115.70                     |
| 8     | \$ 867,370.80           | \$ 867,370.80                     |
| 9     | \$ -0-                  |                                   |
| 10    | \$ -0-                  |                                   |

John Fay, Treasurer

SIGNATURE OF TREASURER

Date: 7/13/83

For further information contact  
Federal Election Commission  
Telephone: (202) 424-9510  
202-424-4068

All previous versions of FEC FORM 2 and FEC FORM 224 are obsolete and should no longer be used.

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

Name of Candidate (in Full)

**Seafarers Political Activity Donation**

Period Covering the Period

From **June 1** to **June 30, 1983**

|                                                                                                         | COLUMN A<br>Total This Period | COLUMN B<br>Calendar Year-To-Date |       |
|---------------------------------------------------------------------------------------------------------|-------------------------------|-----------------------------------|-------|
| <b>I. RECEIPTS</b>                                                                                      |                               |                                   |       |
| 11 CONTRIBUTIONS (other than loans) FROM:                                                               |                               |                                   |       |
| (a) Individuals/Persons Other Than Political Committees<br>(Memo Entry Unitemized \$ <u>63,289.90</u> ) | 66,085.90                     | 438,615.40                        | 11(a) |
| (b) Political Party Committees                                                                          | -0-                           | -0-                               | 11(b) |
| (c) Other Political Committees                                                                          | -0-                           | -0-                               | 11(c) |
| (d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))                                 | 66,085.90                     | 438,615.40                        | 11(d) |
| 12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES                                                     | -0-                           | -0-                               | 12    |
| 13 ALL LOANS RECEIVED                                                                                   | -0-                           | -0-                               | 13    |
| 14 LOAN REPAYMENTS RECEIVED                                                                             | -0-                           | -0-                               | 14    |
| 15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)                                           | -0-                           | -0-                               | 15    |
| 16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES<br>AND OTHER POLITICAL COMMITTEES                | -0-                           | -0-                               | 16    |
| 17 OTHER RECEIPTS (Dividends, Interest, etc.)                                                           | -0-                           | -0-                               | 17    |
| 18 TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)                                                | 66,085.90                     | 438,615.40                        | 18    |
| <b>II. DISBURSEMENTS</b>                                                                                |                               |                                   |       |
| 19 OPERATING EXPENDITURES                                                                               | -0-                           | 959.60                            | 19    |
| 20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES                                                       | -0-                           | -0-                               | 20    |
| 21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND<br>OTHER POLITICAL COMMITTEES                                | 24,550.00                     | 93,956.10                         | 21    |
| 22 INDEPENDENT EXPENDITURES (Use Schedule E)                                                            | -0-                           | -0-                               | 22    |
| 23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES<br>(2 U.S.C. § 441 aid) (Use Schedule F)           | -0-                           | -0-                               | 23    |
| 24 LOAN REPAYMENTS MADE                                                                                 | -0-                           | -0-                               | 24    |
| 25 LOANS MADE                                                                                           | -0-                           | -0-                               | 25    |
| 26 REFUNDS OF CONTRIBUTIONS TO                                                                          |                               |                                   |       |
| (a) Individuals/Persons Other Than Political Committees                                                 | -0-                           | -0-                               | 26(a) |
| (b) Political Party Committees                                                                          | -0-                           | -0-                               | 26(b) |
| (c) Other Political Committees                                                                          | -0-                           | -0-                               | 26(c) |
| (d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))                                             | -0-                           | -0-                               | 26(d) |
| 27 OTHER DISBURSEMENTS                                                                                  | -0-                           | 58,200.00                         | 27    |
| 28 TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)                             | 24,550.00                     | 153,115.70                        | 28    |
| <b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>                                            |                               |                                   |       |
| 29 TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)                                               | 66,085.90                     | 438,615.40                        | 29    |
| 30 TOTAL CONTRIBUTION REFUNDS from Line 26(d)                                                           | -0-                           | -0-                               | 30    |
| 31 NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)                                 | 66,085.90                     | 438,615.40                        | 31    |
| 32 TOTAL OPERATING EXPENDITURES from Line 19                                                            | -0-                           | 959.60                            | 32    |
| 33 OFFSETS TO OPERATING EXPENDITURES from Line 15                                                       | -0-                           | -0-                               | 33    |
| 34 NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)                                           | -0-                           | 959.60                            | 34    |

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)

Seafarers Political Activity Donation

ORIGINAL Filing

| A. Full Name, Mailing Address and ZIP Code                    | Purpose of Disbursement                                                                                                                                                                             | Date (month, day, year) | Amount of Each Disbursement This Period |
|---------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------------|
| Friends of Albert Gore Jr.<br>Route 2<br>Carthage, Tenn 37030 | Albert Gore Jr.-Sen-Tenn<br>YTD-5,000.00<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input checked="" type="checkbox"/> Other (specify): 184 Primary | 6/29/83                 | 5,000.00                                |
| 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 Page (last page only - no number only)             |                                                                                                                                                                                                     |                         |                                         |

88040703856

EXHIBIT D

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

(Summary Page)

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

88 MAR 23 AM 10:45

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)  
**Seafarers Political Activity Donation**

Address (Number and Street)  
**5201 Auth Way**

City, State and ZIP Code  
**Camp Springs, Maryland 20746**

Check here if address is different than previously reported

2. FEC Identification Number  
**C 0000 4325**

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

4. TYPE OF REPORT (Check appropriate box)

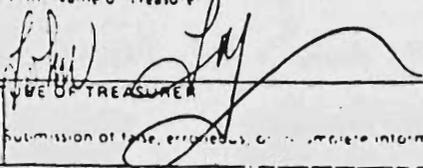
(a)  April 15 Quarterly Report  October 15 Quarterly Report  
 July 15 Quarterly Report  January 31 Year End Report  
 July 31 Mid Year Report (Non-Election Year Only)  
 Monthly Report for December 1983  
 Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
election on \_\_\_\_\_ in the State 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<br>This Period | COLUMN B<br>Calendar Year-to-Date |
|------------------------------------------------------------------------------------------|----------------------------------------------------|-------------------------|-----------------------------------|
| 5. Covering Period                                                                       | <u>December 1</u> through <u>December 31, 1983</u> |                         |                                   |
| 6(a) Cash on hand January 1, 19 <u>83</u>                                                |                                                    |                         | \$ 581,871.10                     |
| (b) Cash on Hand at Beginning of Reporting Period                                        |                                                    | \$ 1,065,411.59         |                                   |
| (c) Total Receipts (from Line 12)                                                        |                                                    | \$ 79,980.70            | \$ 844,940.40                     |
| (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) |                                                    | \$ 1,145,392.29         | \$ 1,426,811.50                   |
| 7 Total Disbursements (from Line 28)                                                     |                                                    | \$ 351,393.56           | \$ 632,812.77                     |
| 8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))             |                                                    | \$ 793,998.73           | \$ 793,998.73                     |
| 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.

John Fay, Treasurer  
Type or Print Name of Treasurer

  
SIGNATURE OF TREASURER

1/30/84  
Date

For further information contact  
Federal Election Commission  
Tel. Free 800 424 9630  
Local 202 523 4066

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 18 U.S.C. 1015.

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

FEC FORM 3X, 12/83

Name of Committee (in Full)

Seafarers Political Activity Donation

Report Covering the Period

From December 1 To December 31

|                                                                                             | Report Covering the Period    |                           |       |
|---------------------------------------------------------------------------------------------|-------------------------------|---------------------------|-------|
|                                                                                             | From December 1               | To December 31            |       |
|                                                                                             | COLUMN A<br>Total This Period | COLUMN B<br>Calendar Year |       |
| <b>I. RECEIPTS</b>                                                                          |                               |                           |       |
| 11 CONTRIBUTIONS (other than loans) FROM:                                                   |                               |                           |       |
| (a) Individuals/Persons Other Than Political Committees                                     | 79,980.70                     | 844,940.                  | 11(a) |
| (b) Political Party Committees                                                              | -0-                           | -0-                       | 11(b) |
| (c) Other Political Committees                                                              | -0-                           | -0-                       | 11(c) |
| (d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))                     | 79,980.70                     | 844,940.                  | 11(d) |
| 12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES                                         | -0-                           | -0-                       | 12    |
| 13 ALL LOANS RECEIVED                                                                       | -0-                           | -0-                       | 13    |
| 14 LOAN REPAYMENTS RECEIVED                                                                 | -0-                           | -0-                       | 14    |
| 15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)                               | -0-                           | -0-                       | 15    |
| 16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES       | -0-                           | -0-                       | 16    |
| 17 OTHER RECEIPTS (Dividends, Interest, etc.)                                               | -0-                           | -0-                       | 17    |
| 18 TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)                                    | 79,980.70                     | 844,940.40                | 18    |
| <b>II. DISBURSEMENTS</b>                                                                    |                               |                           |       |
| 19 OPERATING EXPENDITURES                                                                   | 2,093.56                      | 9,866.67                  | 19    |
| 20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES                                           | -0-                           | -0-                       | 20    |
| 21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES                       | 349,300.00                    | 549,246.10                | 21    |
| 22 INDEPENDENT EXPENDITURES (use Schedule E)                                                | -0-                           | -0-                       | 22    |
| 23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F) | -0-                           | -0-                       | 23    |
| 24 LOAN REPAYMENTS MADE                                                                     | -0-                           | -0-                       | 24    |
| 25 LOANS MADE                                                                               | -0-                           | -0-                       | 25    |
| 26 REFUNDS OF CONTRIBUTIONS TO                                                              |                               |                           |       |
| (a) Individuals/Persons Other Than Political Committees                                     | -0-                           | -0-                       | 26(a) |
| (b) Political Party Committees                                                              | -0-                           | -0-                       | 26(b) |
| (c) Other Political Committees                                                              | -0-                           | -0-                       | 26(c) |
| (d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))                                 | -0-                           | -0-                       | 26(d) |
| 27 OTHER DISBURSEMENTS                                                                      | -0-                           | 3,700.00                  | 27    |
| 28 TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)                 | 351,393.56                    | 632,812.77                | 28    |
| <b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>                                |                               |                           |       |
| 29 TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)                                   | 79,980.70                     | 844,940.40                | 29    |
| 30 TOTAL CONTRIBUTION REFUNDS from Line 26(d)                                               | -0-                           | -0-                       | 30    |
| 31 NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)                     | 79,980.70                     | 844,940.40                | 31    |
| 32 TOTAL OPERATING EXPENDITURES from Line 19                                                | 2,093.56                      | 9,866.67                  | 32    |
| 33 OFFSETS TO OPERATING EXPENDITURES from Line 15                                           | -0-                           | -0-                       | 33    |
| 34 NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)                               | 2,093.56                      | 9,866.67                  | 34    |

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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)

Seafarers Political Activity Donation

88040703859

| A. Full Name, Mailing Address and ZIP Code                                                              | Purpose of Disbursement                                                                                                                     | Date (month, day, year) | Amount of Each Disbursement This Period |
|---------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------------|
| Quillen for Congress Committee<br>214 Cumberland St./P.O.Box 68<br>Kingsport, TN 37662                  | James Quillen-HR-1-TN<br>YTD-5,000.00                                                                                                       | 12/20/83                | 2,500.00                                |
|                                                                                                         | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| Re-elect Lloyd to Congress<br>P.O.Box 1568<br>Chattanooga, TN 37401                                     | Marylin Lloyd-HR-3-TN<br>YTD-1,000.00                                                                                                       | 12/7/83                 | 1,000.00                                |
|                                                                                                         | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| Citizens to Elect Don Sundquist to Congress<br>12th Floor Union Planters Bank Bldg<br>Memphis, TN 38103 | Donald Sundquist-HR-7-TN<br>YTD-500.00                                                                                                      | 12/1/83                 | 500.00                                  |
|                                                                                                         | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| Friends of Ed Jones<br>P.O.Box 173<br>Yorkville, TN 38389                                               | Ed Jones HR-8-TN<br>YTD-500.00                                                                                                              | 12/1/83                 | 500.00                                  |
|                                                                                                         | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| John J. Duncan Campaign<br>5403 East Sunset Rd.<br>Knoxville, TN 37914                                  | John J. Duncan-HR-2-TN<br>YTD-1,000.00                                                                                                      | 12/1/83                 | 1,000.00                                |
|                                                                                                         | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| Re-elect Harold Ford Committee<br>Suite 1810 Sterick Bldg.<br>Memphis, TN 38103                         | Harold Ford-HR-9-TN<br>YTD-1,000.00                                                                                                         | 12/1/83                 | 1,000.00                                |
|                                                                                                         | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| Jim Cooper for Congress Committee<br>P.O.Box 684<br>Shelbyville, TN 37160                               | James Cooper-HR-4-TN<br>YTD-500.00                                                                                                          | 12/1/83                 | 500.00                                  |
|                                                                                                         | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| Re-elect Congressman Boner<br>P.O.Box 60685<br>Nashville, TN 37206                                      | William Boner-HR-5-TN<br>YTD-1,000.00                                                                                                       | 12/1/83                 | 1,000.00                                |
|                                                                                                         | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |
| Albert Gore Jr. for Congress Comm.<br>P.O.Box 335<br>Smithville, TN 37166                               | Albert Gore Jr.-HR-6-TN<br>YTD-5,000.00                                                                                                     | 12/7/83                 | 5,000.00                                |
|                                                                                                         | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): |                         |                                         |

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

*Original Filed*

88040703860

EXHIBIT E

(Summary Page)

ALIGN AREA

ALIGN HERE  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

1. Name of Committee (In Full)  
**Seafarers Political Activity Donation**

Address (Number and Street)  
**5201 Auth Way**

City, State and ZIP Code  
**Camp Springs, MD 20746**

Check here if address is different than previously reported.

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 December 1983  
 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

88 MAR 23 AM 10:46

(b) Is this Report an Amendment?  
 YES  NO

2. FEC Identification Number  
**C 0000 4325**

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

5. Covering Period December 1 through December 31, 1983

|                                                                                                 | COLUMN A<br>This Period | COLUMN B<br>Calendar Year-to-Date |
|-------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------|
| 6(a) Cash on hand January 1, 19 <u>83</u> .....                                                 |                         | \$ 581,871.10                     |
| 6(b) Cash on Hand at Beginning of Reporting Period .....                                        | \$ 1,065,411.59         |                                   |
| 6(c) Total Receipts (from Line 18) .....                                                        | \$ 79,980.70            | \$ 844,940.40                     |
| 6(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) ..... | \$ 1,145,392.29         | \$ 1,426,811.50                   |
| 7. Total Disbursements (from Line 28) .....                                                     | \$ 351,393.56           | \$ 632,812.77                     |
| 8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) .....             | \$ 793,998.73           | \$ 793,998.73                     |
| 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-                  |                                   |

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

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

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

6(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

Thomas J. Bovo, Asst. Treasurer  
 Type or Print Name of Treasurer

[Signature]  
 SIGNATURE OF TREASURER

10/9/84  
 Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 USC § 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)

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

Name of Committee (in Full)

**Seafarers Political Activity Donation**

Report Covering the Period

From **December 1** To **December 31**

|                                                                                                                   | COLUMN A<br>Total This Period | COLUMN B<br>Calendar Year |       |
|-------------------------------------------------------------------------------------------------------------------|-------------------------------|---------------------------|-------|
| <b>I. RECEIPTS</b>                                                                                                |                               |                           |       |
| 11. CONTRIBUTIONS (other than loans) FROM:                                                                        |                               |                           |       |
| (a) Individuals/Persons Other Than Political Committees . . . . .<br>(Memo Entry Unitemized \$ <u>71,486.20</u> ) | 79,980.70                     | 844,940.40                | 11(a) |
| (b) Political Party Committees . . . . .                                                                          | -0-                           | -0-                       | 11(b) |
| (c) Other Political Committees . . . . .                                                                          | -0-                           | -0-                       | 11(c) |
| (d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c)) . . . . .                                 | 79,980.70                     | 844,940.40                | 11(d) |
| 12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES . . . . .                                                    | -0-                           | -0-                       | 12    |
| 13. ALL LOANS RECEIVED . . . . .                                                                                  | -0-                           | -0-                       | 13    |
| 14. LOAN REPAYMENTS RECEIVED . . . . .                                                                            | -0-                           | -0-                       | 14    |
| 15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) . . . . .                                          | -0-                           | -0-                       | 15    |
| 16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES<br>AND OTHER POLITICAL COMMITTEES . . . . .               | -0-                           | -0-                       | 16    |
| 17. OTHER RECEIPTS (Dividends, Interest, etc.) . . . . .                                                          | -0-                           | -0-                       | 17    |
| 18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17) . . . . .                                               | 79,980.70                     | 844,940.40                | 18    |
| <b>II. DISBURSEMENTS</b>                                                                                          |                               |                           |       |
| 19. OPERATING EXPENDITURES . . . . .                                                                              | 2,093.56                      | 9,866.60                  | 19    |
| 20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES . . . . .                                                      | -0-                           | -0-                       | 20    |
| 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND<br>OTHER POLITICAL COMMITTEES . . . . .                               | 349,300.00                    | 549,246.10                | 21    |
| 22. INDEPENDENT EXPENDITURES (use Schedule E) . . . . .                                                           | -0-                           | -0-                       | 22    |
| 23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES . . . . .<br>(2 U.S.C. § 441 a(d)) (Use Schedule F)         | -0-                           | -0-                       | 23    |
| 24. LOAN REPAYMENTS MADE . . . . .                                                                                | -0-                           | -0-                       | 24    |
| 25. LOANS MADE . . . . .                                                                                          | -0-                           | -0-                       | 25    |
| 26. REFUNDS OF CONTRIBUTIONS TO                                                                                   |                               |                           |       |
| (a) Individuals/Persons Other Than Political Committees . . . . .                                                 | -0-                           | -0-                       | 26(a) |
| (b) Political Party Committees . . . . .                                                                          | -0-                           | -0-                       | 26(b) |
| (c) Other Political Committees . . . . .                                                                          | -0-                           | -0-                       | 26(c) |
| (d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c)) . . . . .                                             | -0-                           | -0-                       | 26(d) |
| 27. OTHER DISBURSEMENTS . . . . .                                                                                 | -0-                           | 3,700.00                  | 27    |
| 28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27) . . . . .                            | 351,393.56                    | 632,812.70                | 28    |
| <b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>                                                      |                               |                           |       |
| 29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d) . . . . .                                              | 79,980.70                     | 844,940.40                | 29    |
| 30. TOTAL CONTRIBUTION REFUNDS from Line 26(d) . . . . .                                                          | -0-                           | -0-                       | 30    |
| 31. NET CONTRIBUTION (other than loans) (Subtract Line 30 from Line 29) . . . . .                                 | 79,980.70                     | 844,940.40                | 31    |
| 32. TOTAL OPERATING EXPENDITURES from Line 19 . . . . .                                                           | 2,093.56                      | 9,866.60                  | 32    |
| 33. OFFSETS TO OPERATING EXPENDITURES from Line 15 . . . . .                                                      | -0-                           | -0-                       | 33    |
| 34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32) . . . . .                                          | 2,093.56                      | 9,866.60                  | 34    |

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)

Seafarers Political Activity Donation

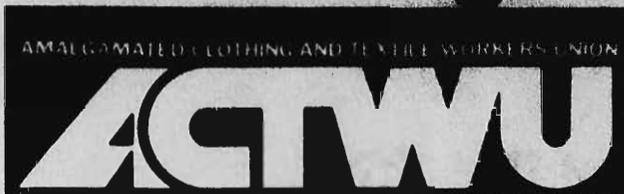
| A. Full Name, Mailing Address and ZIP Code                                                                                                            | Purpose of Disbursement                                                                                                                                                                           | Date (month, day, year) | Amount of Each Disbursement This Period |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------------|
| Quillen for Congress Committee<br>214 Cumberland St./P.O.Box 68<br>Kingsport, TN 37662                                                                | James Quillen-HR-1-TN<br>YTD-5,000.00<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):              | 12/20/83                | 2,500.00 /                              |
| B. Full Name, Mailing Address and ZIP Code<br>Re-elect Lloyd to Congress<br>P.O.Box 1568<br>Chattanooga, TN 37401                                     | Marylin Lloyd-HR-3-TN<br>YTD-1,000.00<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):              | 12/7/83                 | 1,000.00 /                              |
| C. Full Name, Mailing Address and ZIP Code<br>Citizens to Elect Don Sundquist to Congress<br>12th Floor Union Planters Bank Bldg<br>Memphis, TN 38103 | Donald Sundquist-HR-7-TN<br>YTD-500.00<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):             | 12/1/83                 | 500.00 /                                |
| D. Full Name, Mailing Address and ZIP Code<br>Friends of Ed Jones<br>P.O.Box 173<br>Yorkville, TN 38389                                               | Ed Jones HR-8-TN<br>YTD-500.00<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                     | 12/1/83                 | 500.00 /                                |
| E. Full Name, Mailing Address and ZIP Code<br>John J. Durican Campaign<br>5403 East Sunset Rd.<br>Knoxville, TN 37914                                 | John J. Durican-HR-2-TN<br>YTD-1,000.00<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):            | 12/1/83                 | 1,000.00 /                              |
| F. Full Name, Mailing Address and ZIP Code<br>Re-elect Harold Ford Committee<br>Suite 1810 Sterick Bldg.<br>Memphis, TN 38103                         | Harold Ford-HR-9-TN<br>YTD-1,000.00<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                | 12/1/83                 | 1,000.00 /                              |
| G. Full Name, Mailing Address and ZIP Code<br>Jim Cooper for Congress Committee<br>P.O.Box 684<br>Shelbyville, TN 37160                               | James Cooper-HR-4-TN<br>YTD-500.00<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                 | 12/1/83                 | 500.00 /                                |
| H. Full Name, Mailing Address and ZIP Code<br>Re-elect Congressman Boner<br>P.O.Box 60685<br>Nashville, TN 37206                                      | William Boner-HR-5-TN<br>YTD-1,000.00<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):              | 12/1/83                 | 1,000.00 /                              |
| I. Full Name, Mailing Address and ZIP Code<br>Albert Gore Jr. for Congress Comm.<br>P.O.Box 335<br>Smithville, TN 37166                               | Albert Gore Jr.-SEN-TN<br>YTD-5,000.00<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): '84 General | 12/7/83                 | 5,000.00 /                              |

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

*Committed*

600# 8872



AFL-CIO, CLC

15 UNION SQUARE • NEW YORK, N.Y. 10003-3377  
(212) 242-0700

JACK SHEINKMAN  
President

CHARLES SALLEE  
Secretary-Treasurer

ARTHUR LOEVY  
Executive Vice President

EXPRESS MAIL B 04606536W  
March 23, 1988

Sandra Robinson, Esq.  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2584  
Amalgamated Clothing and Textile  
Workers Union Political Action  
Committee and Friends of Albert  
Gore, Jr.

Dear Ms. Robinson:

Enclosed please find a designation of counsel designating myself and Arthur M. Goldberg as Counsel for Respondent Amalgamated Clothing and Textile Workers Union Political Action Committee in the above captioned case.

The complaint in this matter was received by the Union on March 14, 1988, and a response is due in Washington on March 29, 1988. Respondent ACTWU-PAC hereby requests an extension of two weeks in which to file its response to the complaint. This extension of time is necessary because in order to fully respond to the complaint, we must search files located in both Washington, D.C. and New York City. In addition, I have had extensive and unexpected out of time travel which has prevented me from reviewing the documents in the New York office. The two week extension of time would extend the deadline to April 12, 1988.

Thank you for your consideration in this matter.

Very truly yours,

cc: Charles Sallee  
Arthur M. Goldberg  
Liz Smith

*Jean Grumet*  
Jean Grumet  
Assistant General Counsel

VICE PRESIDENT

JOHN ALLERUZZO  
NOEL BEASLEY  
KILMER CABAN  
ED CLARK

ANTHONY COSTANZA  
JEAN-MARC COUTURE  
OLGA DIAZ  
JAMES DILLON  
HENRY DROPKIN  
BRUCE DUNTON

GARRY FERRARIS  
JOHN FOX  
JOSEPH HUIGHE  
JAMES A. JOHNSON  
RICHARD MacFADYEN  
CHESTER MAKOSKI

JOYCE D MILLER  
MURRAY MORENO  
DANIEL MYERS  
FRANK NICHOLAS, JR.  
CARMEN PAPALE  
BRUCE RAYNOR

THOMAS RUMORE  
LEON SPITZER  
AMANDA STEVENS  
CECIL TOPPIN  
JIM WALRAVEN

88 MAR 24 AM 10:52

HAND DELIVERED  
FEDERAL ELECTION COMMISSION

8 3 0 4 0 7 0 3 8 6 4

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2584

NAME OF COUNSEL: Arthur Goldberg and Jean Grumet

ADDRESS: 15 Union Square  
New York, NY 10003

TELEPHONE: 212-242-0700

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

March 14, 1988  
Date

Charles Sallee  
Signature

RESPONDENT'S NAME: Charles Sallee

ADDRESS: 15 Union Square  
New York, NY 10003

HOME PHONE: 212-420-6086

BUSINESS PHONE: 212-242-0700

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 28, 1988

*glur*

Jean Grumet, Esquire  
Amalgamated Clothing &  
Textile Workers Union  
15 Union Square  
New York, N.Y. 10003-3377

RE: MUR 2584  
Amalgamated Clothing & Textile  
Workers Union - Political  
Action Committee and Charles  
Sallee, as treasurer

Dear Ms. Grumet:

This is in response to your letter dated March 23, 1988, which we received on March 24, 1988, requesting an extension until April 12, 1988, to respond to the complaint in this matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on April 12, 1988.

If you have any questions, please contact Sandra H. Robinson the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

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6CC# 8915

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

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LAW OFFICES  
**SONOSKY, CHAMBERS & SACHSE**  
SUITE 1000

1250 EYE STREET, N.W.  
WASHINGTON, D.C. 20005  
(202) 682-0240

ANCHORAGE OFFICE  
SUITE 700  
900 WEST FIFTH AVENUE  
ANCHORAGE, ALASKA 99501  
(907) 258-6377  
TELECOPIER (907) 272-8332

MARVIN J. SONOSKY  
HARRY R. SACHSE  
REID PEYTON CHAMBERS  
WILLIAM R. PERRY  
LLOYD BENTON MILLER\*  
DONALD J. SIMON  
DOUGLAS B. L. ENDRESON\*\*  
MARY V. BARNEY  
LOUISE LYNCH  
ANNE D. NOTO  
JILL A. DE LA HUNT\*\*\*

March 25, 1988

OF COUNSEL  
LOFTUS E. BECKER, JR.  
ROGER W. DUBROCK\*\*\*

\*RESIDENT PARTNER, ANCHORAGE OFFICE  
\*\*ADMITTED IN WISCONSIN  
\*\*\*ADMITTED IN ALASKA

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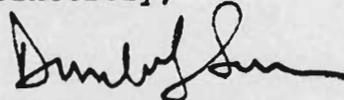
Sandra Robinson, Esq.  
Attorney  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2584

Dear Ms. Robinson:

I enclose for filing in the above-captioned MUR a response to the complaint on behalf of Senator Albert Gore, Jr., the Friends of Albert Gore, Jr. Committee and the Committee treasurers. I also enclose the appropriate designations of counsel.

Sincerely,



Donald J. Simon

DJS/cmt  
Enclosure  
Copy to:

Todd Campbell, Esq.  
Jack Wright Robinson  
William Puryear  
Fred Martin  
John M. Quinn, Esq.

88 MAR 28 PM 2:44

RECEIVED  
FEDERAL ELECTION COMMISSION

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2584

NAME OF COUNSEL: Donald J. Simon

ADDRESS: Sonosky, Chambers & Sachse

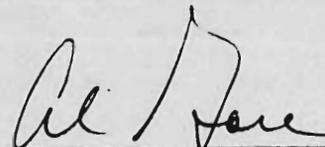
Suite 1000

1200 Eye Street, N.W.

TELEPHONE: Washington, D.C. 20005

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.

3/24/88  
Date

  
Signature

RESPONDENT'S NAME: Albert Gore, Jr.

ADDRESS: 1725 Jefferson Davis Hwy. #602

P.O. Box 15800

Arlington, Va. 22215

HOME PHONE: 703/521-5521

BUSINESS PHONE: 703/979-1988

88040703868

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2584

NAME OF COUNSEL: Donald Simon

ADDRESS: Sonosky, Chambers & Fachse  
Suite 1000, 1250 I St, NW  
Washington, DC 20005

TELEPHONE: (202) 682-0240

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.

3/17/88  
Date

William P. Puryear  
Signature

RESPONDENT'S NAME: Friends of Albert Gore, Jr.

ADDRESS: c/o William Puryear & Co.  
10th Floor  
Third National Bank Building

Nashville, TN 37219

HOME PHONE: (615) 259-9038

BUSINESS PHONE: (615) 259-9038

88040703869

**STATEMENT OF DESIGNATION OF COUNSEL**

**NO. 2584**

**NAME OF COUNSEL:** Donald J. Simon

**ADDRESS:** Sonogy, Chambers & Sechan,

Suite 1000

1200 Eye Street, N.W.

**TELEPHONE:** Washington, D.C. 20005.

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.

3/24/88  
**Date**

Jack Wright Robinson  
**Signature**

**RESPONDENT'S NAME:** JACK WRIGHT ROBINSON

**ADDRESS:** 710 LYNNBROOK ROAD  
NASHVILLE, TN 37215

**HOME PHONE:** (615) 297-7245

**BUSINESS PHONE:** (615) 244-4994

88040703870

BEFORE THE FEDERAL ELECTION COMMISSION

In re: MUR 2584

RESPONSE TO COMPLAINT  
ON BEHALF OF RESPONDENTS SENATOR ALBERT GORE, JR.,  
FRIENDS OF ALBERT GORE, JR. COMMITTEE AND ITS TREASURER

Donald J. Simon  
SONOSKY, CHAMBERS & SACHSE  
1250 Eye Street, N.W.  
Suite 1000  
Washington, D.C. 20005  
(202) 682-0240

Counsel for Senator Albert  
Gore, Jr., Friends of Albert  
Gore Jr. Committee and its  
Treasurer

Of Counsel:

Todd Campbell  
Post Office Box 15800  
Arlington, Virginia 22215

March 28, 1988

88040703871

BEFORE THE FEDERAL ELECTION COMMISSION

In re: MUR 2584

RESPONSE TO COMPLAINT  
ON BEHALF OF RESPONDENTS SENATOR ALBERT GORE, JR.,  
FRIENDS OF ALBERT GORE, JR. COMMITTEE AND ITS TREASURER

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On March 1, 1988, Ray O. Brooks, Jr. filed a complaint against Senator Albert Gore Jr., and the Friends of Albert Gore, Jr. Committee, his 1984 authorized Senate campaign committee. The complaint alleges that Senator Gore and his campaign committee accepted contributions from three union political committees during the 1984 campaign in excess of the contribution limit in 2 U.S.C. §441(a)(2).<sup>1/</sup>

Respondents received notification of this complaint on March 11. This response is filed to demonstrate that the allegations made in the complaint against Senator Gore and the Committee are frivolous and should be dismissed.<sup>2/</sup>

- 
- 1/ Although the complaint nowhere so states, identical allegations were made by letter to Senator Gore dated February 2, 1988 from the Executive Director of the Center on National Labor Policy, who issued a press release on the allegations and disseminated his letter to the press.
- 2/ In addition to Senator Gore and the Committee, the complaint, in its listing of parties in Paragraph 2, names Jack Wright Robinson, the Committee's former treasurer, as a respondent. The Commission did not serve the complaint on

Introduction

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The complaint alleges that three union political committees made contributions in excess of the \$5,000 limit per election to either Senator Gore's 1984 primary, or his 1984 general election campaign.<sup>3/</sup> Under the law, each committee could contribute \$5,000 to a candidate such as Senator Gore "with respect to any election for Federal office..." 11 C.F.R. §110.2(a)(1) (1984). It is clear that the primary election and the general election are considered separate "elections" for purposes of applying the \$5,000 per election contribution limit. See e.g., 11 C.F.R. §§100.2, 110.1(a)(2). Thus each contributor committee at issue here could contribute \$5,000 to Senator Gore's 1984 primary campaign, and another \$5,000 to his 1984 general

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Mr. Robinson, but instead served it on William P. Puryear, the Committee's current treasurer.

Indeed, the complaint's listing of parties is confused and inconsistent. Although the complaint lists the Committee as a respondent in its cover caption, it fails to list the Committee in its statement of parties. See Paragraph 2. And although Mr. Robinson, the Committee's former treasurer, is listed as a respondent, nowhere is the Committee's current treasurer so listed, although he was served with the complaint by the Commission.

In order to dispel any confusion, this response is filed on behalf of Senator Gore, his 1984 Senate campaign committee, and both its former and current treasurers. All appropriate designations of counsel have been submitted.

3/ Complainant does not contest that each of the contributor union committees qualified as a "multicandidate political committee," 11 C.F.R. 100.5(e)(3), and is therefore subject to the \$5,000 limit.

election campaign, for an aggregate permissible contribution of \$10,000. 2 U.S.C. §441(a)(2). In no instance cited by complainant did the Gore Committee receive more than the aggregate \$10,000 it could accept from any one multicandidate committee for both the primary and general elections. Rather, complainant alleges that the committees contributed more than the \$5,000 limit to either the Committee's primary or its general election account.

In fact, the allegations are demonstrably false. The charges are based either on a misreading of the relevant public disclosure reports, or on the fact that the contributor committees, in some instances, misreported on their public disclosure reports the proper designation for the contribution. And even in some of those cases, the union committee has long since amended its reports and corrected that error, but the correction was unnoticed -- or ignored -- by complainant. In all cases, however, the Gore Committee properly received -- and properly reported -- the contributions at issue here. The Committee can demonstrate on the face of its public disclosure reports that it received no excess contribution. The complaint against Senator Gore, the Gore Committee and its treasurers should accordingly be dismissed without further action.

We address each allegation in turn.

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1. Seafarer's Political Activity Donation

The complaint alleges that the Gore Committee received a contribution of \$5,000 from the Seafarer's Political Activity Donation (SPAD) on June 30, 1983 designated for the 1984 primary election, and another \$5,000 contribution on December 23, 1983 also designated for the primary election. Accordingly, the complainant concludes that the Gore Committee received and accepted from SPAD a total contribution of \$10,000 for the primary election, obviously in excess of the \$5,000 limit. See Complaint at ¶¶ 8-12.

In fact, the June 30 contribution of \$5,000 was made by SPAD to the primary campaign, and the December 23 contribution was made to the general election campaign. Both contributions were proper and within the permissible limit.

Exhibit A is a copy of the transmittal letter and check for the June 30 contribution. The letter specifically designates the contribution as being "to your 1984 Primary Election Campaign." Exhibit B is a copy of the Committee's public disclosure report for the relevant period, showing the contribution reported as made to its primary account.

Exhibit C is a copy of the transmittal letter and check for the December 23 contribution. The letter specifically

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designates the contribution as being "to your 1984 General Election Campaign for Congress." Exhibit D is a copy of the Committee's public disclosure report for the relevant period, showing this contribution reported as made to its general election account.

This demonstration is sufficient to show that the Gore Committee did not receive any excess contribution from SPAD. Both the June contribution to the primary account and the December contribution to the general election account were within the permissible \$5,000 limit. Both were designated to the Committee properly and both were reported by the Gore Committee properly.

Complainant's confusion on this matter may arise from the fact that SPAD, on its disclosure report filed on January 30, 1984, initially reported the December contribution as designated to the primary election. See Exhibit D attached to letter of March 15, 1988 from Marianne Rogers, SPAD Treasurer, to Lois Lerner, Esq. As SPAD now states, this was simply a clerical error. However, SPAD subsequently filed an amended report on October 9, 1984, correcting that clerical error and reporting the December contribution as designated for the general election. See Exhibit E to Rogers letter.

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Whatever reporting error SPAD may have made, the Gore Committee committed no wrong either in the acceptance or the reporting of these contributions. The charge on this matter against the Committee should clearly be dismissed.

2. ACTWU

The complaint alleges that the Gore Committee received from the Amalgamated Clothing and Textile Workers Union Political Action Committee (ACTWU) a contribution of \$200 on November 26, 1983 for its primary account, another contribution of \$800 on December 30, 1983 for its primary account, and a third contribution of \$5,000 on September 9, 1984, also for its primary account. Accordingly, complainant alleges that the Committee received a total contribution of \$6,000 to its primary account, in excess of the \$5,000 limit. See Complaint ¶¶ 13-17.

In fact, the first two contributions listed above were made to the primary account, and the \$5,000 contribution was made to the general election account. All contributions were proper and reported by the Gore Committee properly.

At the time these contributions were made, the Commission's regulations provided that for any contribution not designated in writing by the contributor for a particular election, the contribution was to be designated "for a primary

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election...if made on or before the date of the election..., and "for a general election if made after the date of the primary election." 11 C.F.R. §§110.2(a)(1); 110.1(2)(11)(A),(B) (1984).

None of the contributions made by ACTWU to the Gore Committee were designated. Under the rule, therefore, the date of the contribution determined the proper designation.

The 1984 Tennessee Senatorial primary was held on August 2, 1984. Any undesignated contributions made to the Gore campaign prior to that date would be automatically designated to the primary campaign; contributions after that date would be designated to the general election.

Exhibit E is a copy of the November 17, 1983 contribution check for \$200 and transmittal letter. It shows the contribution to be undesignated. Accordingly, since the contribution was made prior to the primary election, it was designated to the primary. The same is true for the \$800 contribution made on December 19, 1983. See Exhibit F.<sup>4/</sup>

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4/ Although the complainant did not raise the issue, the ACTWU made three additional contributions to the Gore Committee prior to the primary election, one for \$1,000 on June 24, 1983, one for \$500 on June 24, 1983 and a third for \$100 on April 6, 1984. The total of these five contributions made to the primary account was \$2,600.

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The Committee properly reported these contributions as made to the primary election account. See Exhibit G.

On August 22, 1984, the ACTWU made an undesignated contribution in the amount of \$5,000 to the Committee. Since this contribution was made after the primary election, it was, under the Commission's regulations, to be automatically attributed to the general election. The Committee so reported it. See Exhibit H.

Accordingly, it is clear that the Committee properly received and reported a total of \$2,600 from the ACTWU to its primary account, including the two contributions totaling \$1,000 cited by the complainant, and also properly received and reported a contribution for \$5,000 to its general election account. In both instances, the contributions were within the applicable \$5,000 contribution limit.

The complainant indicates that the ACTWU may have misreported some of the contributions made to the primary election as instead being designated to the general election.<sup>5/</sup>

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5/ It is our understanding that the \$800 contribution of December 19, 1983 was properly reported by the ACTWU as a primary contribution, but the \$200 contribution was mistakenly reported as made for the general election. It is our further understanding this misreporting was due to a clerical error by the ACTWU, and was corrected by the ACTWU by the filing of an amended disclosure report on February 12, 1988.

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If the contributor committee so misreported its contribution, the fault, if any, lies with the contributor committee, not with the recipient Gore Committee. The Gore Committee, based on its receipt of various undesignated contributions, and the regulations governing the designation of such contributions, properly attributed the contributions to the primary election, up to August 2, 1984, and to the general election thereafter. In no way was the Gore Committee responsible for the disclosure reports filed by the union committee. If the contributor committee subsequently erred in the designation it put on its public disclosure report, that reporting error cannot convert an otherwise lawful contribution into an unlawful one. If a contribution was made to the Gore Committee's primary account, was deposited into the Committee's primary account, was reported by the Committee as a contribution to its primary account, then the fact that the contributor inadvertently listed the contribution as made for the general election reflects only a reporting mistake by the contributor -- not, as complainant suggests, the receipt of an illegal contribution by the Gore Committee. The remedy is simply for the contributor committee to amend its report to properly reflect the contribution made.<sup>6/</sup>

6/ This is not to say that a contributor committee could not, if it so wished, designate a contribution made prior to the primary to be for the general election rather than for the primary. Certainly it could do so under the Commission rules in effect at the time by making its designation express at the time of the contribution. See 11 C.F.R. §110.1(a)(2)(i) (1984). However, where a contribution is undesignated at the time of making, a subsequent misreporting of the contribution by the contributor does not

Accordingly, the Gore Committee properly received and properly reported all contributions from the ACTWU. The charge on this matter against the Committee should clearly be dismissed.

3. Amalgamated Transit Union

The complaint alleges that the Gore Committee received five contributions from the Amalgamated Transit Union (ATU), totaling \$6,000, and that all of the contributions were designated for the primary election. Therefore, the complainant concludes, the Gore Committee accepted contributions to its primary account in excess of the permissible \$5,000 limit. Complaint, ¶¶ 18-22.

In fact, as with the contributions from the ACTWU, the contributions received by the Gore Committee from the ATU were undesignated. The Committee thus applied the rule that an undesignated contribution is to be attributed to the primary if received prior to the primary election, and to the general election if received after the primary election. 11 C.F.R. §110.1(a)(2) (1984).

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work a retroactive redesignation of it. Otherwise, the recipient committee would be unable to know how to designate the contribution, how to report it, and how to apply the contribution limits. Surely the law cannot be applied in a manner to put a recipient committee at a continuing risk of potential violation of the contribution limits through no fault of its own.

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By check dated October 27, 1983, the Gore Committee received a \$500 contribution from the ATU. Since the check and its accompanying transmittal letter indicated no designation, see Exhibit I, and since the contribution was received prior to the primary election, the Committee treated the contribution as one designated to the primary. It was reported by the Committee as a contribution to the primary account. See Exhibit J.

By check dated November 15, 1983, the Committee received a \$1,000 contribution from the ATU, again undesignated. See Exhibit K. Again, since this was received primary to the August, 1984 primary, the Committee treated the contribution as one made to its primary account, and so reported it. See Exhibit J.

By check dated February 28, 1984, the Committee received another \$500 -- undesignated -- contribution from the ATU. See Exhibit L. Since this was received prior to the primary, the Committee designated the contribution to its primary account, and so reported that designation. See Exhibit M.

Finally, by check dated May 23, 1984, the Committee received a \$1,500 contribution, also undesignated. See Exhibit N. Since this was prior to the primary, the Committee treated

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the contribution as made to its primary account, and so reported it. See Exhibit O.

These four checks -- all made to the primary election -- totalled \$3,500, well within the \$5,000 contribution limit.

By check dated September 5, 1984 -- after the primary election -- the Committee received an undesignated contribution of \$2,500. See Exhibit P. Since this was received after the primary, the Commission's regulations required the Committee to treat the contribution as made to its general election account, and apply it against a separate \$5,000 contribution limit available to the ATU. The Committee did so, and reported the contribution as made to its general election account. See Exhibit Q. This was the only contribution made by the ATU to the Committee's general election fund, and thus within the \$5,000 contribution limit available to the ATU.

It is our understanding that the ATU misreported the first four contributions as designated to the Committee's general election account, rather than its primary account, thus creating an impression, from the ATU's public disclosure reports, that the contribution limit to the general election had been exceeded. As noted above, the error -- if any -- lay solely in the contributor committee's reporting of these contributions, not in the Gore Committee's acceptance or reporting of them. Thus, at worst,

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the problem which complainant points to here is only one of a technical misreporting by the contributor committee, a problem which can -- and should -- be simply remedied by the filing of the appropriate amended reports.<sup>7/</sup>

In any event, no violation whatsoever has been committed by the Gore Committee. From the Committee's point of view, the undesignated contributions made and received prior to the primary election were properly designated to the primary and so reported. As such, they were within the ATU's primary election contribution limit. However the ATU may have reported, or misreported, those contributions, it creates no wrongdoing on the part of the Gore Committee.

#### Conclusion

The complaint fails to state even a hint of wrongdoing by Senator Gore, the Friends of Albert Gore, Jr. Committee, or its treasurers. As amply documented above, the Committee properly received, properly accounted for and properly reported every single contribution at issue here. Whatever technical reporting mistakes may have been made by some of the contributor

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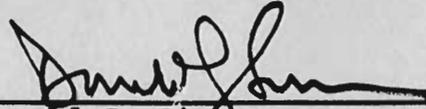
7/ It is our understanding that the ATU has filed, or is in the process of filing, amended reports showing the first four contributions as properly attributable to the primary election.

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committees, those faults should not be visited upon the Gore Committee, which handled these contributions properly.

Accordingly, the complaint as against Senator Gore, the Gore Committee and its treasurers should be dismissed without further action.

Respectfully submitted,



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Donald J. Simon  
SONOSKY, CHAMBERS & SACHSE  
1250 Eye Street, N.W.  
Suite 1000  
Washington, D.C. 20005  
(202) 682-0240

Of counsel:

Todd Campbell, Esq.  
Post Office Box 15800  
Arlington, Virginia 22215

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EXHIBIT A



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EXHIBIT B

22-Jul-83

FRIENDS OF ALBERT GORE, JR. CAMPAIGN COMMITTEE  
FEC LINE 11(C) - POLITICAL ACTION COMMITTEES  
JANUARY 1 THRU JUNE 30, 1983

Page - 19

| PAC NAME                          | DATE     | ELECTION | \$ THIS PERIOD |
|-----------------------------------|----------|----------|----------------|
| Pan Am Political Action Committee | 06-22-83 | PRIMARY  | \$ 500.00      |

Attention: Mr. Bill Evans  
Pan Am Corporation  
1660 L Street, N.W., Suite 901  
Washington, DC 20036

AGGREGATE YTD: \$ 500.00

|                                            |          |         |           |
|--------------------------------------------|----------|---------|-----------|
| Public Ownership of Electric Resources PAC | 06-22-83 | PRIMARY | \$ 250.00 |
|--------------------------------------------|----------|---------|-----------|

PowerPAC  
2301 H Street, N. W.  
3rd Floor, DC 20037

AGGREGATE YTD: \$ 250.00

|                                       |          |         |             |
|---------------------------------------|----------|---------|-------------|
| Responsible Citizens Political League | 05-28-83 | PRIMARY | \$ 500.00   |
|                                       | 06-22-83 | PRIMARY | \$ 1,000.00 |

Brotherhood of Railway & Airline Clerks  
3 Research Place  
Rockville, MD 20850

AGGREGATE YTD: \$ 1,500.00

|                                    |          |         |           |
|------------------------------------|----------|---------|-----------|
| Rockwell International Corporation | 06-30-83 | PRIMARY | \$ 500.00 |
|------------------------------------|----------|---------|-----------|

Good Government Committee  
Attn: Mr. M. L. Haddock, Treasurer  
600 Grant Street  
Pittsburgh, PA 15215

AGGREGATE YTD: \$ 500.00

|                                       |          |         |             |
|---------------------------------------|----------|---------|-------------|
| Seafarers Political Activity Donation | 06-30-83 | PRIMARY | \$ 5,000.00 |
|---------------------------------------|----------|---------|-------------|

Attention: Mr. Frank Drozak, Chairman  
Seafarers International Union  
5201 Auth Way  
Camp Springs, MD 20746

AGGREGATE YTD: \$ 5,000.00

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EXHIBIT C



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EXHIBIT D

27-Jan-64 FRIENDS OF ALBERT GORE, JR. CAMPAIGN COMMITTEE Page - 31  
 SEC LINE 11C - PACS AND OTHER POLITICAL COMMITTEE RECEIPTS  
 JULY 1 THRU DECEMBER 31, 1963

PAC NAME DATE ELECTION \$ THIS PERIOD  
 -----  
 ROLK Political Action Committee 12-05-63 PRIMARY \$ 500.00

Attention: Lyn Johnson  
 478 West Hamilton  
 Suite 201  
 Campbell, CA 95008

AGGREGATE YTD: \$ 500.00

Roundtable Political Action Committee 08-12-63 PRIMARY \$ 1,000.00

Attn: James S. Tisch, Co-Chairman  
 666 Fifth Avenue, 3rd Floor  
 New York, NY 10103

AGGREGATE YTD: \$ 1,000.00

Sansco, Inc. Political Action 12-30-63 PRIMARY \$ 250.00

Committee  
 East Hanover, NJ 07936

AGGREGATE YTD: \$ 250.00

Scheraga Plough Corporation 12-22-63 PRIMARY \$ 1,000.00

Better Government Fund  
 1000 Gallopings Hill Road  
 Kentilworth, IL 60143

AGGREGATE YTD: \$ 1,000.00

Business Political Activity Reporter 12-15-63 (RECEIVED) \$ 5,000.00

Attention: Mr. Frank Brown, CI Branch  
 American International Union  
 1501 North Bay  
 West Virginia, WV 26704

AGGREGATE YTD: \$ 5,000.00

402103797



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EXHIBIT E

| DATE              | AMOUNT |
|-------------------|--------|
| Tickets           |        |
| TOTAL OF INVOICES |        |
| LESS DISCOUNT     |        |
| LESS              |        |
| TOTAL DEDUCTIONS  |        |
| AMOUNT OF CHECK   |        |

**ACTWU POLITICAL ACTION COMMITTEE**  
15 UNION SQUARE  
NEW YORK, N.Y. 10003

1082  
1-337/260

November 17 1983 ✓

PAY TO THE ORDER OF Friends of Albert Gore, Jr. \$ 200.00

Two hundred and 00/100 DOLLARS

**AB** AMALGAMATED BANK OF NEW YORK  
124 11-TH UNION SQUARE NEW YORK, NEW YORK 10003

*Jacob Sheinkman*  
*Murray Finley*

⑈001082⑈ ⑆026003379⑆ 01077276⑈

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AMALGAMATED CLOTHING AND TEXTILE WORKERS UNION

MURRAY H. FINLEY  
President

JACOB SHEINKMAN  
Secretary-Treasurer

SCOTT HOYMAN  
Executive Vice President

815 SIXTEENTH ST., N.W. • WASHINGTON, D.C. 20006  
(202) 628-0214

APL-CIO, CLC #62

ELIZABETH M. SMITH, Director  
Legislative and Political Education Department

November 7, 1983

Friends of Albert Gore, Jr.  
P. O. Box 3000  
Nashville, Tennessee 37219

Dear Friends:

Enclosed is our check for \$200.00 to cover the cost of tickets to the reception for Congressman Gore which was held in Knoxville on November 5. Our manager, Mrs. Geneva Sneed, and three others attended the reception.

This contribution is made possible by the voluntary contributions of our members in Tennessee.

*Murray Finley* Sincerely,  
*Jacob Sheinkman*

Murray Finley Jack Sheinkman

MF/JS:jav  
Enclosure: \$200.00 check  
cc: Geneva Sneed

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EXHIBIT F



88040703898

EXHIBIT G



88040703900

EXHIBIT H

04-Oct-04

FRIENDS OF ALBERT GORE, JR. Page - 1 of 30

CANDIDATE COMMITTEE Line 11C

PACS AND OTHER POLITICAL COMMITTEE RECEIPTS

JULY 10, 1904 THROUGH SEPTEMBER 30, 1904

| PAC NAME | DATE | ELECTION | \$ THIS PERIOD |
|----------|------|----------|----------------|
|----------|------|----------|----------------|

|                                                                                             |          |         |          |
|---------------------------------------------------------------------------------------------|----------|---------|----------|
| ACTU Political Action Committee<br>815 16th Street, NW<br>Suite 310<br>Washington, DC 20006 | 09-05-04 | GENERAL | 5,000.00 |
|---------------------------------------------------------------------------------------------|----------|---------|----------|

AGGREGATE YTD: \$ 5,100.00

|                                                                                 |          |         |        |
|---------------------------------------------------------------------------------|----------|---------|--------|
| Alabama Farm Bureau Federation<br>Post Office Box 11023<br>Montgomery, AL 36190 | 08-01-04 | PRIMARY | 500.00 |
|---------------------------------------------------------------------------------|----------|---------|--------|

AGGREGATE YTD: \$ 500.00

|                                                                                                                                    |          |         |          |
|------------------------------------------------------------------------------------------------------------------------------------|----------|---------|----------|
| ALPA-PAC<br>Air Line Pilots Association PAC<br>Political Representative<br>1625 Massachusetts Avenue, N.W.<br>Washington, DC 20036 | 08-28-04 | GENERAL | 2,500.00 |
|------------------------------------------------------------------------------------------------------------------------------------|----------|---------|----------|

AGGREGATE YTD: \$ 5,000.00

|                                                                                                                 |          |         |          |
|-----------------------------------------------------------------------------------------------------------------|----------|---------|----------|
| Amalgamated Transit Union<br>COPE Account - Voluntary Fund<br>5025 Wisconsin Avenue, NW<br>Washington, DC 20016 | 09-11-04 | GENERAL | 2,500.00 |
|-----------------------------------------------------------------------------------------------------------------|----------|---------|----------|

AGGREGATE YTD: \$ 4,500.00

10,500.00

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EXHIBIT I

AMALGAMATED TRANSIT UNION  
COPE ACCOUNT—VOLUNTARY FUND  
5025 WISCONSIN AVENUE, N.W.  
WASHINGTON, D.C. 20016

No. 1028

October 27 1983 15-55  
840

PAY TO THE ORDER OF Friends of Albert Gore, Jr. \$ 500.00

Five Hundred Dollars & 00/100 DOLLARS

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

*John Lowland*  
INTERNATIONAL PRESIDENT  
*R.C. Wallace*  
INTERNATIONAL SECRETARY-TREASURER

⑆0540⑉0055⑆ 09⑈862 74 875⑈



# Amalgamated Transit Union

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

Office of the International Secretary-Treasurer

October 28, 1983

Friends of Albert Gore, Jr.  
P. O. Box 3000  
Nashville, Tennessee 37219

Gentlemen:

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

Enclosed please find a check for \$500.00 and a receipt which is to be returned to my office.

With best wishes, I am

Sincerely,

*R.C. Wallace*

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

Enclosures

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EXHIBIT J

27-JAN-84 FRIENDS OF ALBERT GOPE, JR. CAMPAIGN COMMITTEE Page - 3  
 REC LINE 11C - PACS AND OTHER POLITICAL COMMITTEE RECEIPTS  
 JULY 1 THRU DECEMBER 31, 1983  
 -----

| PAC NAME                  | DATE     | ELECTION | \$ THIS PERIOD |
|---------------------------|----------|----------|----------------|
| → Allocated Transit Union | 11-01-83 | PRIMARY  | \$ 500.00      |
|                           | 11-21-83 | PRIMARY  | \$ 1,000.00    |

COFF Account - Voluntary Fund  
 Attn: Mr. R. C. Wallace  
 5025 Wisconsin Avenue, N.W.  
 Washington, DC 20016

-----  
 AGGREGATE YTD: \$ 1,500.00  
 -----

|                                   |          |         |           |
|-----------------------------------|----------|---------|-----------|
| American Agriculture Movement PAC | 11-10-83 | PRIMARY | \$ 550.00 |
|-----------------------------------|----------|---------|-----------|

Attention: David Serter  
 100 Maryland Avenue, N.W., Suite 500A  
 Pw 09  
 Washington, DC 20002

-----  
 AGGREGATE YTD: \$ 550.00  
 -----

|                                       |          |         |           |
|---------------------------------------|----------|---------|-----------|
| American Chiropractic Association PAC | 11-21-83 | PRIMARY | \$ 550.00 |
|---------------------------------------|----------|---------|-----------|

Attn: Mr. David O'Brien, Director Cong. Rel.  
 American Chiropractic Association  
 1416 Wilson Boulevard  
 Arlington, VA 22201

-----  
 AGGREGATE YTD: \$ 1,050.00  
 -----

|                     |          |         |           |
|---------------------|----------|---------|-----------|
| American Dental PAC | 11-21-83 | PRIMARY | \$ 500.00 |
|---------------------|----------|---------|-----------|

Attention: Beverly J. Bailey  
 1101 17th Street, N.W.  
 Suit. 1004  
 Washington, DC 20036

-----  
 AGGREGATE YTD: \$ 500.00  
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|                            |          |         |           |
|----------------------------|----------|---------|-----------|
| American Express Committee | 10-26-83 | PRIMARY | \$ 500.00 |
|----------------------------|----------|---------|-----------|

For Information: Government  
 Attn: Mr. Larry L. Trovian  
 1700 K Street, N.W., 707  
 Washington, DC 20004

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 AGGREGATE YTD: \$ 500.00  
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EXHIBIT K

AMALGAMATED TRANSIT UNION  
COPE ACCOUNT—VOLUNTARY FUND

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

No. 1036

November 15 1983 10:55 AM '83

PAY TO THE ORDER OF Friends of Albert Gore, Jr. 1,000.00

-----One Thousand Dollars & 00/100----- DOLLARS

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

*John Rowland*  
INTERNATIONAL PRESIDENT  
*R.C. Wallace*  
INTERNATIONAL SECRETARY-TREASURER

⑆0540⑆0055⑆09⑆862 74 875⑆



# Amalgamated Transit Union

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

Office of the International Secretary-Treasurer

November 15, 1983

83040703907

Friends of Albert Gore, Jr.  
Jack Wright Robinson, Treasurer  
Route 2  
Carthage, Tenn. 37030

Gentlemen:

The Amalgamated Transit Union is delighted to join in your efforts to elect Representative Albert Gore, Jr., of Tennessee, to the U.S. Senate seat now held by Majority Leader Howard Baker, who is retiring.

Representative Gore has not only been a popular member of the House, he is also a very able person.

In order to be helpful in this effort, enclosed is check #1036 in the amount of \$1,000.00. Please sign the enclosed receipt and return it to the undersigned in order that we may comply with the Corrupt Practices Act.

Sincerely,

*R.C. Wallace*

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

RCW/vh

Enc.

88040703908

EXHIBIT L

COLUMBIA GAS EMPLOYEES POLITICAL ACTION FUND-A

Feb. 28 1984

★02-9  
011

TO THE ORDER OF Friends of Albert Gore, Jr.

\$ 500.00

Five hundred and no/oo

DOLLARS

CAMPAIGN CONTRIBUTION



WILMINGTON TRUST COMPANY  
WILMINGTON, DELAWARE

*S.C. Kauffman*

⑆000475⑆ ⑆031100092⑆ 2220 5617⑆

NAME Hart T. Mankin

TY POC

H. ADDR \_\_\_\_\_

H. ADDR 20 Montchanin Road

Wilmington, Delaware

19807

H. PHONE \_\_\_\_\_

H. PHONE \_\_\_\_\_

9 OCC \_\_\_\_\_

DATE REC 2/28

9 BUS \_\_\_\_\_

DEPT \_\_\_\_\_

9 HOUSE \_\_\_\_\_

EVENT Miscellaneous

9 SAL Mr.

STAFF John

No. 1107

AMALGAMATED TRANSIT UNION  
COPE ACCOUNT—VOLUNTARY FUND  
5025 WISCONSIN AVENUE, N.W.  
WASHINGTON, D.C. 20016

Feb. 28 1984 <sup>15-55</sup>/<sub>540</sub>

\$ 500.00

PAY TO THE ORDER OF

Friends of Albert Gore, Jr.

Five Hundred Dollars & 00/100

DOLLARS

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

*John Rowland*  
INTERNATIONAL PRESIDENT  
*R.C. Wallace*  
INTERNATIONAL SECRETARY-TREASURER

⑆0540⑆0055⑆ 09⑆862 74 875⑆

NAME R.C. Wallace

TY POC

H. ADDR \_\_\_\_\_

H. ADDR \_\_\_\_\_

H. PHONE \_\_\_\_\_

H. PHONE 202-537-1645

88040703910

EXHIBIT M

10-Apr-84

FRIENDS OF ALBERT GORE, JR.  
CAMPAIGN COMMITTEE  
PACS AND OTHER POLITICAL COMMITTEE RECEIPTS  
JANUARY 1 THRU MARCH 31, 1984

Page - 1 of 23  
Line 11C

| PAC NAME                                                                                      | DATE     | ELECTION | \$ THIS PERIOD |
|-----------------------------------------------------------------------------------------------|----------|----------|----------------|
| 20th Century Political<br>Action Committee<br>25 Century Park Way<br>Salt Lake City, UT 84115 | 02-21-84 | PRIMARY  | 250.00         |

AGGREGATE YTD: \$ 250.00

|                                                                                                                   |          |         |        |
|-------------------------------------------------------------------------------------------------------------------|----------|---------|--------|
| Alliance of American Insurers<br>Federal Political Action Committee<br>1501 Meefield Road<br>Schaumburg, IL 60195 | 03-15-84 | PRIMARY | 550.00 |
|-------------------------------------------------------------------------------------------------------------------|----------|---------|--------|

AGGREGATE YTD: \$ 550.00

|                                                                                                                                               |          |         |        |
|-----------------------------------------------------------------------------------------------------------------------------------------------|----------|---------|--------|
| Amalgamated Transit Union<br>COPE Account - Voluntary Fund<br>Attn: Mr. R. C. Wallace<br>5025 Wisconsin Avenue, N. W.<br>Washington, DC 20016 | 03-20-84 | PRIMARY | 500.00 |
|-----------------------------------------------------------------------------------------------------------------------------------------------|----------|---------|--------|

AGGREGATE YTD: \$ 500.00

|                                                                                                                                                                   |          |         |        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|---------|--------|
| American Agriculture Movement<br>Political Action Committee<br>Attn: Ms. Joan Senter, Treasurer<br>100 Maryland Avenue, N. E., Suite 500A<br>Washington, DC 20002 | 03-15-84 | PRIMARY | 200.00 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|---------|--------|

AGGREGATE YTD: \$ 200.00

1,500.00

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EXHIBIT N

AMALGAMATED TRANSIT UNION  
COPE ACCOUNT—VOLUNTARY FUND  
6025 WISCONSIN AVENUE, N.W.  
WASHINGTON, D.C. 20016

C00032995

No. 1246

May 23 1984 15:55  
540

PAY TO THE ORDER OF -----Friends of Albert Gore, Jr.----- \$1,500.00

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

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

*John Lowland*  
INTERNATIONAL PRESIDENT  
*R.C. Wallace*  
INTERNATIONAL SECRETARY-TREASURER

⑆0540⑈0055⑆ 09⑈862 74 875⑈

NAME <sup>3</sup> R.C. Wallace

NOTE: If name is not exactly as it is signed on check please explain.

JOB <sup>3</sup> ADD

070

407

040

HOME PHONE

OFFICE

RELATION <sup>3</sup> Mr.

0

THANK YOU *yes*

JOB

BUSINESS

BUS ADD

BUS PHONE

EVENT *FEOS* STAFF *E*

3.

8 8 0 4 0 7 0 3 9 1 4

EXHIBIT O

09-Jul-84

FRIENDS OF ALBERT GOE, JR. Page - 3 of 37  
CANDIDATE COMMITTEE Line 11C  
PACS AND OTHER POLITICAL COMMITTEE RECEIPTS  
4-1-84 - 6-30-84

| PAC NAME                                                                                                          | DATE     | ELECTION | \$ THIS PERIOD |
|-------------------------------------------------------------------------------------------------------------------|----------|----------|----------------|
| → Amalgamated Transit Union<br>COPE Account - Voluntary Fund<br>5025 Wisconsin Avenue, NW<br>Washington, DC 20016 | 06-25-84 | PRIMARY  | 1,500.00       |

AGGREGATE YTD: \$ 2,000.00

|                                                                                       |          |         |        |
|---------------------------------------------------------------------------------------|----------|---------|--------|
| American Book Publishers PAC<br>2005 Massachusetts Avenue, NW<br>Washington, DC 20036 | 05-11-84 | PRIMARY | 500.00 |
|---------------------------------------------------------------------------------------|----------|---------|--------|

AGGREGATE YTD: \$ 500.00

|                                                                                                |          |         |        |
|------------------------------------------------------------------------------------------------|----------|---------|--------|
| American Consulting Engineers PAC<br>1015 15th Street, NW<br>Suite 802<br>Washington, DC 20005 | 04-06-84 | PRIMARY | 500.00 |
|------------------------------------------------------------------------------------------------|----------|---------|--------|

AGGREGATE YTD: \$ 500.00

|                                                                                      |                      |                    |                  |
|--------------------------------------------------------------------------------------|----------------------|--------------------|------------------|
| American Hospital Association PAC<br>840 North Lake Shore Drive<br>Chicago, IL 60611 | 06-05-84<br>06-05-84 | PRIMARY<br>PRIMARY | 250.00<br>250.00 |
|--------------------------------------------------------------------------------------|----------------------|--------------------|------------------|

AGGREGATE YTD: \$ 1,500.00

3,000.00

84020141372

88040703916

EXHIBIT P

88040703917

AMALGAMATED TRANSIT UNION  
 COPE ACCOUNT—VOLUNTARY FUND  
 8025 WISCONSIN AVENUE, N.W.  
 WASHINGTON, D.C. 20016

No. 1326  
 Sept. 5 1984 12:58  
 845

PAY TO THE ORDER OF Friends of Albert Gore, Jr. \$ 2,500.00

Two Thousand Five Hundred Dollars & 00/100 DOLLARS

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

John K. ... INTERNATIONAL PRESIDENT  
 R.C. Wallace INTERNATIONAL SECRETARY-TREASURER

⑆0540⑈0055⑆ 09⑈862 74 875⑈

NAME Raymond C. Wallace THANK YOU yes

NOTE: If name is not exactly as it is signed on check please explain. Wallace

HOME ADDR COOO32995 - Qual. JOB \_\_\_\_\_

HOME PHONE \_\_\_\_\_ BUSINESS \_\_\_\_\_

SPOUSE \_\_\_\_\_ BUS ADDR \_\_\_\_\_

EVALUATION Mr. BUS PHONE \_\_\_\_\_

EVENT FS21 STAFF E

COLEMBIA GAS EMPLOYEES POLITICAL ACTION FUND-A 475

Day \_\_\_\_\_ Feb. 28 1984 \*82-0  
 311

TO THE ORDER OF Friends of Albert Gore, Jr. \$ 500.00

Five hundred and no/00 DOLLARS

CAMPAIGN CONTRIBUTION

WILMINGTON TRUST COMPANY  
 WILMINGTON, DELAWARE

S.C. Kauffman

⑆000175⑈⑆031100092⑆ 2220 5617⑈

NAME Hart T. Mankin TX POC

H. ADDR \_\_\_\_\_ B. ADDR 20 Montchanin Road  
Wilmington, Delaware  
19807

H. PHONE \_\_\_\_\_ B. PHONE \_\_\_\_\_

CCC \_\_\_\_\_ DATE REC 2/28

BUS \_\_\_\_\_ DEP 1 \_\_\_\_\_

SPOUSE: \_\_\_\_\_ EVENT Miscellaneous

EAL Mr. STATE \_\_\_\_\_

88040703918

EXHIBIT Q

00-Oct-04

FRIENDS OF ALBERT GORE, JR.

Page - 1 of 30

CANDIDATE COMMITTEE

Line 11C

PACS AND OTHER POLITICAL COMMITTEE RECEIPTS

JULY 14, 1994 THROUGH SEPTEMBER 30, 1994

| PAC NAME | DATE | ELECTION | \$ THIS PERIOD |
|----------|------|----------|----------------|
|----------|------|----------|----------------|



|                                                                                              |          |         |          |
|----------------------------------------------------------------------------------------------|----------|---------|----------|
| ACTIU Political Action Committee<br>835 16th Street, NW<br>Suite 210<br>Washington, DC 20006 | 09-05-04 | GENERAL | 5,000.00 |
|----------------------------------------------------------------------------------------------|----------|---------|----------|

AGGREGATE YTD: \$ 5,100.00

|                                                                                 |          |         |        |
|---------------------------------------------------------------------------------|----------|---------|--------|
| Alabama Fore Bureau Federation<br>Post Office Box 11023<br>Montgomery, AL 36190 | 08-01-04 | PRIMARY | 500.00 |
|---------------------------------------------------------------------------------|----------|---------|--------|

AGGREGATE YTD: \$ 500.00

|                                                                                                                                    |          |         |          |
|------------------------------------------------------------------------------------------------------------------------------------|----------|---------|----------|
| ALPA-PAC<br>Air Line Pilots Association PAC<br>Political Representative<br>1625 Massachusetts Avenue, N.W.<br>Washington, DC 20036 | 08-28-04 | GENERAL | 2,500.00 |
|------------------------------------------------------------------------------------------------------------------------------------|----------|---------|----------|

AGGREGATE YTD: \$ 5,000.00

|                                                                                                                 |          |         |          |
|-----------------------------------------------------------------------------------------------------------------|----------|---------|----------|
| Amalgamated Transit Union<br>CURE Account - Voluntary Fund<br>5025 Wisconsin Avenue, NW<br>Washington, DC 20016 | 09-11-04 | GENERAL | 2,500.00 |
|-----------------------------------------------------------------------------------------------------------------|----------|---------|----------|

AGGREGATE YTD: \$ 4,500.00

10,500.00

84020211434

**SENSITIVE**

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

RECEIVED  
FEDERAL ELECTION COMMISSION

88 APR 15 PM 12:01

**FIRST GENERAL COUNSEL'S REPORT**

MUR 2584  
DATE COMPLAINT RECEIVED BY OGC:  
March 1, 1988  
DATE OF NOTIFICATION TO  
RESPONDENTS: March 8, 1988  
STAFF MEMBER: Sandra H. Robinson

COMPLAINANT: Ray O. Brooks, Jr.  
RESPONDENTS: Senator Albert Gore, Jr.  
Friends of Albert Gore, Jr. and William P. Puryear, as treasurer  
Amalgamated Trust Union - COPE Account Voluntary Fund and Raymond C. Wallace, as treasurer  
Amalgamated Trust Union - COPE and Raymond C. Wallace, as treasurer  
Amalgamated Clothing and Textile Workers Union  
Amalgamated Clothing and Textile Workers Union - Political Action Committee and Charles Sallee, as treasurer  
Seafarers Political Activity Donation and Marianne Rogers, as treasurer

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

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

**I. GENERATION OF MATTER**

On March 1, 1988, Ray O. Brooks, Jr., filed a complaint against Senator Albert Gore, Jr.; Friends of Albert Gore, Jr. ("the Gore Committee") and William P. Puryear, as treasurer;

8 3 0 4 0 7 0 3 9 2 0

Amalgamated Transit Union - COPE ("ATU-COPE") and Raymond C. Wallace, as treasurer; Amalgamated Clothing and Textile Workers Union - Political Action Committee ("ACTWU-PAC") and Charles Sallee, as treasurer; and Seafarers Political Activity Donation ("SPAD") and Marianne Rogers, as treasurer. The complaint alleged that during the 1984 primary and general election Senator Gore and the Gore Committee violated 2 U.S.C. § 441a(f) by accepting excessive contributions from ATU-COPE, SPAD and ACTWU-PAC. The complaint also alleged that ATU-COPE and Raymond C. Wallace, as treasurer; SPAD and Marianne Rogers, as treasurer; and ACTWU-PAC and Charles Sallee, as treasurer,<sup>1/</sup> violated 2 U.S.C. § 441a(a)(2)(A) by making excessive contributions to the Gore Committee during the 1984 election cycle. The complaint also alleged that each treasurer violated 11 C.F.R. § 104.4(d) by providing inaccurate information in disclosure reports filed with the Commission.

Respondents were notified of the complaint on March 8, 1988. ATU-COPE responded to the complaint on March 22, 1988; SPAD responded to the complaint on March 23, 1988; and Senator Gore and the Gore Committee submitted a combined response on March 28, 1988 (this response also included information on behalf of the Gore Committee's past treasurer). On March 24, 1988, this

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<sup>1/</sup> Charles Sallee is the current treasurer of ACTWU-PAC, and in conformity with the Commission's policy, had been notified as a respondent in this matter, in his capacity as treasurer. The complaint actually named Jack Sheinkman, who apparently was the treasurer at the time of the alleged violations.

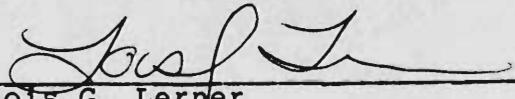
88040703921

Office received a request from counsel for ACTWU-PAC and Charles Sallee, as treasurer, for an extension until April 12, 1988, to respond to the complaint. Counsel stated that in order to provide a complete response, files in Washington, D.C. and New York City would have to be examined. In light of this circumstance, the extension of time was granted.

After receiving the response from ACTWU-PAC and evaluating it along with those already received, this Office will report to the Commission with appropriate recommendations.

Lawrence M. Noble  
General Counsel

4/14/88  
Date \_\_\_\_\_

BY:   
Lois G. Lerner  
Associate General Counsel

88040703922



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: *MW* MARJORIE W. EMMONS/JOSHUA MCFADDEN *JM*

DATE: APRIL 19, 1988

SUBJECT: MUR 2584 - FIRST GENERAL COUNSEL'S REPORT  
SIGNED APRIL 14, 1988

The above-captioned matter was received in the Office of the Secretary of the Commission Friday, April 15, 1988 at 12:01 P.M. and circulated to the Commission on a 24-hour no-objection basis Monday, April 19, 1988 at 11:00 A.M.

There were no objections received in the Office of the Secretary of the Commission to the First General Counsel's Report at the time of the deadline.

88040703923

CCA 9034



JACK SHEINKMAN  
President

CHARLES SALLEE  
Secretary-Treasurer

ARTHUR LOEVY  
Executive Vice President

AFL-CIO, CLC

15 UNION SQUARE • NEW YORK, N.Y. 10003-3377  
(212) 242-0700

APRIL 8, 1988  
EXPRESS MAIL

88 APR - 8 11:10:17

HAND DELIVERED

FEDERAL ELECTIONS COMMISSION

Lawrence M. Noble, General Counsel  
Federal Elections Commission  
999 E Street, N.W.  
Washington, D.C. 20463

RE: MUR 2584

Amalgamated Clothing and Textile Workers  
Union Political Action Committee,  
Charles Sallee, as Treasurer

Dear Mr. Noble:

This letter is in response to your letter dated March 8, 1988 notifying the Respondents, Amalgamated Clothing and Textile Workers Union Political Action Committee ("ACTWU-PAC") and Charles Sallee, Treasurer, that a complaint had been filed by Roy O. Brooks, Jr. in the above-captioned matter, alleging that ACTWU-PAC made two campaign contributions to the Friends of Albert Gore, Jr. totalling \$1,000.00 in excess of the statutory limit in violation of the Federal Election Campaign Act of 1971 (the "Act") for the general election in 1984.

As will be discussed in detail below, the two campaign contributions in question were contributions to the primary election, not the general election as alleged in the complaint. The purported illegal contribution of \$200.00 was the consequence of an inadvertent clerical error in the Respondent's Report of Receipts and Disbursements. This clerical error was corrected with the filing of an Amended Report. The allegedly illegal \$800.00 contribution, however, was in fact correctly reported as a contribution to the primary election on the Respondent's Report of Receipts and Disbursements. For reasons more fully stated below, Respondents respectfully request that no further action be taken on this matter and that the complaint be dismissed.

The complaint alleges that ACTWU-PAC contributed \$6,000.00 to the 1984 federal general election for the Friends of Albert Gore, Jr. in violation of the \$5,000.00 statutory limit provided in 2 U.S.C. Section 441(a) (2) (A) in the following amounts:

88 APR 12 PM 12:51

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FEDERAL ELECTIONS COMMISSION

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VICE PRESIDENT

JOHN ALLERUZZO  
NGEL BEASLEY  
WILMER CABAN  
ED CLARK

ANTHONY COSTANZA  
JEAN-MARC COUTURE  
OLGA DIAZ  
JAMES DILLON  
HENRY DROPKIN  
BRUCE DUNTON

GARRY FERRARIS  
JOHN FOX  
JOSEPH HUGHES  
JAMES A. JOHNSON  
RICHARD MacFADYEN  
CHESTER MAJOSKI

JOYCE D MILLER  
MURRAY MORENO  
DANIEL MYERS  
FRANK NICHOLAS, JR.  
CARMEN PAPALE  
BRUCE RAYNOR

THOMAS RUMORE  
LEON SPITZER  
AMANDA STEVENS  
CECIL TOPPIN  
JIM WALRAVEN

| <u>Date Contributed</u> | <u>Amount</u> |
|-------------------------|---------------|
| 11/17/83                | \$200.00      |
| 12/30/83                | \$800.00      |
| 8/22/84                 | \$5,000.00    |

Our records demonstrate that on November 17, 1983, ACTWU-PAC made a \$200.00 contribution by check made payable to the Friends of Albert Gore, Jr. for tickets to a fundraising dinner. A copy of the letter sent to the Friends of Albert Gore, Jr.<sup>1/</sup> and the accompanying check are attached hereto as Exhibits 1 and 2 respectively. This \$200.00 contribution was not designated in writing for any particular election. The check was made payable to the Friends of Albert Gore, Jr. and was specifically designated for tickets in the margin. The letter accompanying the check stated that the check was for tickets for a fund raiser held on November 5, 1983.

Thus, the \$200.00 in question was intended as a contribution for the primary election and was contributed well in advance of the Tennessee primary of August 7, 1984. The regulations of the Federal Election Commission provide that a contribution not designated in writing for a particular election is deemed a contribution for a primary election if made before the date of the primary. 11 C.F.R. Sections 110.2(a)(1); 110.1(2)(ii)(A),(B). Pursuant to FEC regulations, the undesignated \$200.00 contribution of November 17, 1983 is properly considered a contribution for the primary election of August 7, 1984.

As a result of a clerical error, the \$200.00 contribution was attributed to the general election instead of the primary election in Schedule B Item H of ACTWU-PAC's Report of Receipts and Disbursements for November 1983, attached hereto as Exhibit 3. This clerical error was corrected in Schedule B Item H of ACTWU-PAC's Amended Report of Receipts and Disbursements for November 1983, dated February 12, 1988, attached hereto as Exhibit 4. In all respects, the parties consistently treated the \$200.00 contribution as a contribution to the primary election, with the exception of ACTWU's clerical reporting error, which has been corrected.

With regard to the allegedly illegal \$800.00 contribution, our records show that on December 19, 1983, ACTWU-PAC made an \$800.00 contribution to the Friends of Albert Gore, Jr. A copy of the letter sent to the Gore committee and the accompanying

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1/ Due to a typographical error, the letter is dated November 7, 1983 instead of November 17, 1983.

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check are attached hereto as Exhibits 5 and 6 respectively. This \$800.00 contribution was not designated for any particular election, and was correctly reported as a contribution to the primary campaign in Schedule B Item F of ACTWU-PAC's Report of Receipts and Disbursements for December 1983, attached hereto as Exhibit 7.

It is clear that the \$200.00 contribution made on November 17, 1983 and the \$800.00 contribution made on December 30, 1983 were intended for the August 7, 1984 primary election rather than the November 6, 1984 general election, and that ACTWU-PAC made its best efforts to comply with the statutory maximum contribution limits. ACTWU-PAC treated these contributions as primary contributions in monitoring all other contributions to the Friends of Albert Gore, Jr. For example, a \$100.00 contribution made on March 14, 1984 (months after the questionable \$200.00 and \$800.00 contributions were made) was reported as a contribution to the primary election although the check and the accompanying letter did not designate which election the contribution was for. A copy of the check and the accompanying letter are attached hereto as Exhibits 8 and 9 respectively. Schedule B Item I of ACTWU-PAC's Report of Receipts and Disbursements for March 1984, which reflects this primary contribution is attached hereto as Exhibit 10.

Below is a breakdown of ACTWU-PAC's contributions to the Gore Senate Campaign for primary and general elections held in 1984:

| <u>Date Contributed</u> | <u>Amount</u> | <u>Election</u> |
|-------------------------|---------------|-----------------|
| 6/8/83                  | \$500.00      | Primary         |
| 6/15/83                 | \$1,000.00    | Primary         |
| 11/17/83                | \$200.00      | Primary         |
| 12/19/83                | \$800.00      | Primary         |
| 3/14/84                 | \$100.00      | Primary         |
| 8/22/84                 | \$5,000.00    | General         |

Total contributed to the 8/7/84 primary election = \$2,600.00  
 Total contributed to the 11/6/84 general election = \$5,000.00

ACTWU-PAC's contribution activity demonstrates that it was aware of the statutory limits and made good faith efforts to comply with the Act. ACTWU-PAC's contributions to the August 1984 primary election, including the \$200.00 and \$800.00 contributions in question, totalled \$2,600.00 ACTWU-PAC's contribution to the general election (which contribution was made immediately following the primary) was limited to \$5,000.00 to comply with

88040703926

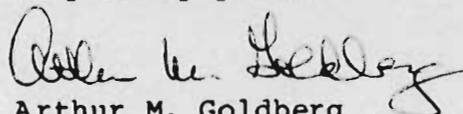
the \$5,000.00 ceiling per election.

All of the parties consistently treated the \$200.00 and \$800.00 as contributions to the primary election. It is our understanding that both the \$200.00 and \$800.00 contributions were deposited in the Gore committee's primary account and were reported by the Friends of Albert Gore, Jr. as contributions to its primary account on page 1 of its January 27, 1984 FEC line 11C Report of Receipts - July 1 through December 31, 1983. The inadvertent clerical error misidentifying the \$200.00 should not be dispositive of the designation of the contribution, where the FEC's own regulations and the conduct of the parties require that it be considered a contribution to the primary election.

Moreover, ACTWU-PAC has changed its procedures to ensure that this kind of administrative error will not occur in the future. Our checks now specifically designate whether the contribution is for the primary or general election.

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

Very truly yours,

  
Arthur M. Goldberg  
General Counsel

  
Jean Grumet  
Assistant General Counsel

cc: Sandra Robinson, Esq.  
Charles Sallee  
Elizabeth M. Smith

4:g:PAC

88040703927

AFL-CIO, CLC  
815 SIXTEENTH ST., N.W. • WASHINGTON, D.C. 20006  
(202) 628-0214

ELIZABETH M. SMITH, Director  
Legislative and Political Education Department

November 7, 1983

Friends of Albert Gore, Jr.  
P. O. Box 3000  
Nashville, Tennessee 37219

Dear Friends:

Enclosed is our check for \$200.00 to cover the cost of tickets to the reception for Congressman Gore which was held in Knoxville on November 5. Our manager, Mrs. Geneva Sneed, and three others attended the reception.

This contribution is made possible by the voluntary contributions of our members in Tennessee.

Sincerely,

Murray Finley

Jack Sheinkman

MF/JS:jav  
Enclosure: \$200.00 check  
cc: Geneva Sneed

88040703928



SCHEDULE B

ITEMIZED DISBURSEMENTS

LINE NUMBER 21  
 (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 Clothing and Textile Workers Union Political Action Committee

| A. Full Name, Mailing Address and ZIP Code                                                                        | Purpose of Disbursement                                                                                                                                | Date (month, day, year) | Amount of Each Disbursement This Period |
|-------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------------|
| Guarini for Congress Committee<br>P O Box 2884<br>Washington, D. C. 20013<br>N.J.                                 | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 11- 7-83                | 500.00                                  |
| Ferraro for Congress, 1978<br>218 Lafayette Street<br>New York, N.Y. 10012<br>N.Y.                                | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 11- 7-83                | 250.00                                  |
| Ed Markey for Congress Committee<br>401 C Street, N.E. Suite 303<br>Washington, D. C. 20002<br>Mass.              | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 11- 7-83                | 250.00                                  |
| Kaptur for Congress Committee<br>7041 Knighthood Lane<br>Columbia, Md 21045<br>Ohio                               | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 11- 7-83                | 250.00                                  |
| Harrison for Congress Committee<br>15 S. Franklin St. 4th fl<br>Wilkes-Barre, PA 18701<br>PA.                     | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 11- 7-83                | 250.00                                  |
| Paul Simon for Senate<br>603 E Capitol St., NE<br>Washington, D. C. 20002<br>IL.                                  | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 11- 7-83                | 500.00                                  |
| Democratic National Committee/<br>Eleanor Roosevelt Fund<br>1625 Massachusetts Ave. NW<br>Washington, D. C. 20036 | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):            | 11-17-83                | 100.00                                  |
| Friends of Albert Gore, Jr.<br>P.O. Box 3000<br>Nashville, Tn. 37219<br>TN.                                       | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 11-17-83                | 200.00                                  |
| Oberstar "84 Committee<br>P O Box 33993<br>Washington, D. C. 20033<br>MN                                          | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 11-17-83                | 250.00                                  |
| SUBTOTAL of Disbursements This Page (optional!)                                                                   |                                                                                                                                                        |                         |                                         |
| TOTAL This Period (last page this line number only)                                                               |                                                                                                                                                        |                         |                                         |

Exhibit 3

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

NAME OF COMMITTEE (in Full)  
Amalgamated Clothing and Textile Workers Union Political Action Committee

1  
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| A. Full Name, Mailing Address and ZIP Code                                                                            | Purpose of Disbursement                                                                                                                               | Date (month, day, year) | Amount of Each Disbursement This Period |
|-----------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------------|
| Guarini for Congress Committee<br>P.O. Box 2884<br>Washington, D. C. 20013<br>New Jersey                              | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify) | 11/7/83                 | 500.00                                  |
| Ferraro for Congress, 1978<br>218 Lafayette Street<br>New York, N.Y. 10012<br>N.Y.                                    | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify) | 11/7/83                 | 250.00                                  |
| Ed Markey for Congress Committee<br>401 C Street, N.E. Suite 303<br>Washington, D. C. 20002<br>MASS.                  | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify) | 11/7/83                 | 250.00                                  |
| Kaptur for Congress Committee<br>7041 Knighthood Lane<br>Columbia, MD 21045<br>OHIO                                   | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify) | 11/7/83                 | 250.00                                  |
| Harrison fo Congress Committee<br>15 S. Franklin St. 9th Floor<br>Wilkes-Barre, Pa 18701<br>PENNA                     | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify) | 11/7/83                 | 250.00                                  |
| Paul Simon for Senate<br>603 E. Capitol St., N.E.<br>Washington, D. C. 20002<br>ILL.                                  | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify) | 11/7/83                 | 500.00                                  |
| Democratic National Committee/<br>Eleanor Roosevelt Fund<br>1625 Massachusetts Avenue N.W.<br>Washington, D. C. 20036 | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)            | 11/17/83                | 100.00                                  |
| Friends of Albert Gore, Jr.<br>P.O. Box 3000<br>Nashville, Tenn. 37219<br>TENN.                                       | Tickets<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify) | 11/17/83                | 200.00                                  |
| Oberstar "84 Committee<br>P.O. Box 33993<br>Washington, D. C. 20033<br>MINN.                                          | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify) | 11/17/83                | 250.00                                  |

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Exhibit 4

AFL-CIO, CLC

815 SIXTEENTH ST., N.W. • WASHINGTON, D.C. 20008  
(202) 628-0214

ELIZABETH M. SMITH, Director  
Legislative and Political Education Department

December 19, 1983

Honorable Albert Gore, Jr.  
1131 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Gore:

Enclosed is our contribution in the amount of \$800.00 to your campaign for election to the Senate.

This contribution is made possible by the voluntary donations of members of the Amalgamated Clothing and Textile Workers Union.

Best wishes to you. I am looking forward to working with you and your staff during the second session of the 98th Congress.

Sincerely,



Elizabeth M. Smith  
Legislative & Political  
Director

EMS:jav

Enclosure

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Exhibit 5



| 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)                                                                                                                                                                                                                                                          |                                                                                                                                                      |                                     |                                                    |
| <b>AMALGAMATED CLOTHING AND TEXTILE WORKERS UNION POLITICAL ACTION COMMITTEE</b>                                                                                                                                                                                                     |                                                                                                                                                      |                                     |                                                    |
| A. Full Name, Mailing Address and ZIP Code<br>Friends of Lane Evans<br>P. O. Box 1222<br>Rock Island, Ill. 61201 ILL.                                                                                                                                                                | Purpose of Disbursement<br><u>Contribution</u>                                                                                                       | Date (month, day, year)<br>12/15/83 | Amount of Each Disbursement This Period<br>500.00  |
|                                                                                                                                                                                                                                                                                      | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify):          |                                     |                                                    |
| B. Full Name, Mailing Address and ZIP Code<br>Bill Gray for Congress Committee<br>602 Vernon Road<br>Philadelphia, Pa. 19119 PA.                                                                                                                                                     | Purpose of Disbursement<br><u>Contribution</u>                                                                                                       | Date (month, day, year)<br>12/15/83 | Amount of Each Disbursement This Period<br>500.00  |
|                                                                                                                                                                                                                                                                                      | Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input checked="" type="checkbox"/> Other (specify): '82 Debt |                                     |                                                    |
| C. Full Name, Mailing Address and ZIP Code<br>Melcher for Senate Committee<br>P. O. Box 23655<br>Washington, D. C. 20024 MONTANA                                                                                                                                                     | Purpose of Disbursement<br><u>Contribution</u>                                                                                                       | Date (month, day, year)<br>12/15/83 | Amount of Each Disbursement This Period<br>2500.00 |
|                                                                                                                                                                                                                                                                                      | Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input checked="" type="checkbox"/> Other (specify): '82 Debt |                                     |                                                    |
| D. Full Name, Mailing Address and ZIP Code<br>The 1984 Democratic Presidential Trust<br>P.O. Box 1800<br>Washington, D. C. 20013                                                                                                                                                     | Purpose of Disbursement<br><u>Tickets</u>                                                                                                            | Date (month, day, year)<br>12/15/83 | Amount of Each Disbursement This Period<br>5000.00 |
|                                                                                                                                                                                                                                                                                      | Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify):          |                                     |                                                    |
| E. Full Name, Mailing Address and ZIP Code<br>Tsongas For Senate Committee<br>P. O. Box 2<br>Andover, Ma. 01810 MA.                                                                                                                                                                  | Purpose of Disbursement<br><u>Contribution</u>                                                                                                       | Date (month, day, year)<br>12/19/83 | Amount of Each Disbursement This Period<br>1000.00 |
|                                                                                                                                                                                                                                                                                      | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):          |                                     |                                                    |
| F. Full Name, Mailing Address and ZIP Code<br>Friends of Albert Gore, Jr.<br>P.O. Box 3000<br>Nashville, Tenn. 37219 TENN.                                                                                                                                                           | Purpose of Disbursement<br><u>Contribution</u>                                                                                                       | Date (month, day, year)<br>12/19/83 | Amount of Each Disbursement This Period<br>800.00  |
|                                                                                                                                                                                                                                                                                      | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):          |                                     |                                                    |
| G. Full Name, Mailing Address and ZIP Code<br>Citizens for D'Amours<br>C/O S. Beauchesne<br>2950 Van Ness St. N. W. #222<br>Washington, D. C. 20008 N.H.                                                                                                                             | Purpose of Disbursement<br><u>Contribution</u>                                                                                                       | Date (month, day, year)<br>12/19/83 | Amount of Each Disbursement This Period<br>1500.00 |
|                                                                                                                                                                                                                                                                                      | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):          |                                     |                                                    |
| H. Full Name, Mailing Address and ZIP Code<br>Friends of Jay Rockefeller<br>C/O Governor & Mrs. W. Averell Harriman<br>3038 N. Street N. W.<br>Washington, D. C. 20007 W. Va.                                                                                                        | Purpose of Disbursement<br><u>Tickets</u>                                                                                                            | Date (month, day, year)<br>12/20/83 | Amount of Each Disbursement This Period<br>1000.00 |
|                                                                                                                                                                                                                                                                                      | Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><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<br><input type="checkbox"/> Other (specify):                     |                                     |                                                    |
| SUBTOTAL of Disbursements This Page (optional) .....                                                                                                                                                                                                                                 |                                                                                                                                                      |                                     |                                                    |
| TOTAL This Period (last page this line number only) .....                                                                                                                                                                                                                            |                                                                                                                                                      |                                     | 12,800.00                                          |

Exhibit 7

March 10, 1984

Honorable Albert Gore, Jr.  
U.S. House of Representatives  
Washington, DC 20515

Dear Al:

Enclosed is a check in the amount of \$100. This contribution to your campaign for election to the U.S. Senate, is made possible by James and Ruby Oliver of 2009 McClain Road, Knoxville, TN 37912.

Mrs. Oliver is a member of Local 147G in Tennessee, and she earmarked her contribution to ACTWU-PAC for your campaign.

I should appreciate it very much if you would send a letter acknowledging the contribution to Mr. and Mrs. Oliver.

Best wishes for a successful campaign.

Very truly yours,

Elizabeth M. Smith

EMS:emg

Enclosure

*Exhibit 8*

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

Name of Committee (in Full)

**Amalgamated Clothing and Textile Workers Union Political Action Committee**

17  
3  
9  
3  
0  
7  
4  
0  
7  
8  
8  
0

| A. Full Name, Mailing Address and ZIP Code                                                                                                                  | Purpose of Disbursement                                                                                                                                                  | Date (month, day, year) | Amount of Each Disbursement This Period |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------------------------|
| Illinois 7th Congressional District<br>Delegates for Mondale<br>429 W. Superior Street Apt. 511<br>Chicago, IL 60610 IL                                     | Contribution<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):              | 3- 8-84                 | 1,000.00                                |
| B. Full Name, Mailing Address and ZIP Code<br>Democratic Senatorial Campaign<br>Committee<br>400 North Capitol Street, Suite 319<br>Washington, D. C. 20001 | Contribution<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify):              | 3- 8-84                 | 5,000.00                                |
| C. Full Name, Mailing Address and ZIP Code<br>Jim Shannon for Senate Committe<br>P O Box 597<br>Lawrence, Massachusetts 01842<br>MA                         | Contribution<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):              | 3- 8-84                 | 1,500.00                                |
| D. Full Name, Mailing Address and ZIP Code<br>Studds for Congress<br>38 Rosa's Lane<br>Scituate, Mass. 02066<br>MA                                          | Contribution<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):              | 3- 8-84                 | 1,500.00                                |
| E. Full Name, Mailing Address and ZIP Code<br>Dyson for Congress<br>Route 1, Box 177-A<br>Accokeek, Maryland 20607<br>MD                                    | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                   | 3- 8-84                 | 300.00                                  |
| F. Full Name, Mailing Address and ZIP Code<br>Congressman Murphy Campaign Committee<br>3026 Tennyson Street, N.W.<br>Washington, D. C. 20015<br>Pa.         | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                   | 3- 8-84                 | 100.00                                  |
| G. Full Name, Mailing Address and ZIP Code<br>Yatron for Congress Committee<br>P O Box 8032<br>Reading, Pa. 19603<br>PA                                     | Tickets<br>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify):                   | 3-8 -84                 | 100.00                                  |
| H. Full Name, Mailing Address and ZIP Code<br>Lloyd Doggett Campaign Fund<br>406 W 13th Street<br>Austin, Texas 78701<br>Tx                                 | Contribution<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify):              | 3-12-84                 | 1,500.00                                |
| I. Full Name, Mailing Address and ZIP Code<br>Friends of Albett Gore, Jr.<br>P O Box 3000<br>Nashville, TN 37219<br>TN                                      | Earmarked<br>Contribution<br>Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify): | 3-14-84                 | 100.00                                  |

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BEFORE THE FEDERAL ELECTION COMMISSION

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In the Matter of )  
 Senator Albert Gore, Jr. )  
 Friends of Albert Gore, Jr. )  
 and William P. Puryear, as treasurer<sup>1/</sup> )  
 Amalgamated Transit Union-COPE<sup>2/</sup> )  
 and Raymond C. Wallace, as treasurer )  
 Amalgamated Clothing and Textile Workers )  
 Union )  
 Amalgamated Clothing and Textile Workers )  
 Union-Political Action Committee and )  
 Charles Sallee, as treasurer )  
 Seafarers Political Activity Donation )  
 and Marianne Rogers, as treasurer )

MUR 2584

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On March 1, 1988, Ray O. Brooks, Jr., through counsel, filed a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") by the respondents. Specifically, it was alleged that Senator Albert Gore, Jr. and his principal campaign committee, Friends of Albert Gore, Jr. ("the Gore Committee") and William P. Puryear, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions during the 1984 election cycle from the Amalgamated

<sup>1/</sup> The complaint named Jack Wright Robinson, the past treasurer; however, in keeping with the Commission's policy, the current treasurer has been named a respondent and was notified of the complaint.

<sup>2/</sup> Although the Amalgamated Transit Union - COPE Account-Voluntary Fund is listed separately in the complaint it is not a separate committee or federal account. It is the name of the bank account of the registered committee, Amalgamated Transit Union - COPE, from which the contributions at issue were made.

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Transit Union - COPE ("ATU-COPE) and Raymond C. Wallace, as treasurer; the Amalgamated Clothing and Textile Workers Union - Political Action Committee ("ACTWU-PAC") and Charles Sallee, as treasurer; and the Seafarers Political Activity Donation ("SPAD") and Marianne Rogers, as treasurer. The complaint also alleged that these respective donor committees and their treasurers violated 2 U.S.C. § 441a(a)(2)(A) by making excessive contributions to the Gore Committee during the 1984 election cycle.<sup>3/</sup> The complainant also sought to impose personal liability on the respective treasurers pursuant to 11 C.F.R. § 104.14(d) for reporting inaccurate information.

Senator Gore, the Gore Committee and William P. Puryear, as treasurer, designated the same counsel, who submitted a joint response to the complaint on March 28, 1988.<sup>4/</sup> Attachment I. SPAD and Marianne Rogers, as treasurer, submitted a response to

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<sup>3/</sup> The Act prohibits a labor organization from making a contribution or expenditure in connection with any election for Federal office. 2 U.S.C. § 441b(a). Pursuant to 2 U.S.C. § 431(9)(B)(iii) Amalgamated Clothing and Textile Workers Union ("ACTWU") reports the costs of any communications it makes to its membership which expressly advocate the election or defeat of a clearly identified candidate, if such costs exceed \$2,000 for any election. ACTWU has been assigned a "C-7" number by the Commission for the filing of such reports. It is noted that Senator Albert Gore, Jr., was not reported by ACTWU as the identified candidate in any of its Reports of Communication Costs filed in the 1983-1984 election cycle. Although the complaint specifically listed ACTWU as a separate respondent, there are no allegations that go directly to the union. Therefore, this Office makes no recommendations with respect to ACTWU.

<sup>4/</sup> The same counsel was also designated by the past treasurer of the Gore Committee, Jack Wright Robinson, who joined in the response.

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the complaint on March 23, 1988. Attachment II. ACTWU-PAC and Charles Sallee, as treasurer, designated counsel, who requested an extension of time to respond to the complaint. See MUR 2584 - First General Counsel's Report, signed April 15, 1988.

Subsequently, a response was submitted on April 11, 1988.

Attachment III. ATU-COPE submitted a response, through counsel, on March 22, 1988. Attachment IV.

## II. FACTUAL AND LEGAL ANALYSIS

Section 441a(f) of the Act prohibits a candidate or political committee from knowingly accepting any contribution or making any expenditure in violation of the provisions of Section 441a. Officers and employees of political committees are prohibited from knowingly accepting any contribution or making any expenditure in violation of the limitations imposed by Section 441a.

Section 441a(a) (2) (A) of the Act prohibits a multi-candidate committee from making contributions to any candidate for Federal office, or to a candidate's political committee, with respect to any election, which in the aggregate exceed \$5,000.

Section 110.2(a) (1),<sup>5/</sup> which pertained to contributions made by a multi-candidate committee, incorporated 11 C.F.R.

§ 110.1(a) (2) to define the term "with respect to any election."

The definition stated that a contribution designated in writing for a particular election shall be for the election so

<sup>5/</sup> The cite is to the regulation in effect during the 1984 election cycle, the period of the alleged violations. The revised regulation became effective in April 1987.

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designated, except that a contribution made after a primary election and designated for such election shall be made only to the extent of the net debts outstanding from the primary election. Where there is no written designation for a contribution, such contribution shall be attributed to the primary election, if made on or before the election date and shall be attributed to the general election if made after the date of the primary election.

Section 104.14(d) of the Commission's Regulations states that the treasurer of a political committee shall be personally responsible for the timely filing of complete reports and statements and for the accuracy of any information contained therein.<sup>6/</sup>

Albert Gore, Jr. was a candidate for the U.S. Senate from the state of Tennessee in the 1984 elections. He was unopposed in the primary election and won the general election with 61 percent of the vote. The Friends of Albert Gore, Jr. is the principal campaign committee for Senator Albert Gore, Jr.

SPAD, ACTWU-PAC, and ATU-COPE are multi-candidate committees in accordance with 2 U.S.C. § 441a(a) (4).

**A. Allegations Concerning Contributions from SPAD**

The complaint alleged that the Gore Committee accepted \$10,000 from SPAD for the 1984 primary election and that it

<sup>6/</sup> The complaint in this matter seeks to impose personal liability on the treasurers under this provision. The Commission, however, ordinarily has made findings of possible violations of this section against the committee and the treasurer of record in his or her official capacity. See MUR 2110 - General Counsel's Report, signed May 21, 1986.

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inaccurately reported \$5,000 of that amount. The Gore Committee reported that a \$5,000 contribution was received on December 23, 1983, designated for the general election, while SPAD reported it as made on December 7, 1983, and designated it for the primary election.<sup>7/</sup> The complaint cited the Gore Committee's disclosure reports which, upon review by this Office, showed that the contributions from SPAD were reported as represented. As to SPAD and Marianne Rogers, as treasurer, the complaint alleged that they made excessive contributions in the amount of \$5,000 to the 1984 primary election campaign of the Gore Committee.

In his response, counsel for the Gore Committee, et al., provided copies of the letters which were transmitted with each contribution from SPAD. A letter dated June 30, 1983, designated a \$5,000 contribution for the primary election. Attachment I(18). A letter dated December 7, 1983, designated a second \$5,000 contribution for the general election. Attachment I(22). Counsel also provided copies of the pages from the Gore Committee's disclosure reports in which the contributions are disclosed. Attachment I(20) and (24). The dates of receipt as disclosed by the Gore Committee would, of course, be different from the dates on which SPAD reported making the contributions.

The written designations were made in compliance with 11 C.F.R. § 110.2(a) and the contributions were within the limitation of 2 U.S.C. § 441a(a) (2) (A). The Gore Committee

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<sup>7/</sup> The primary election in Tennessee was held on August 2, 1984.

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properly reported the contributions. Therefore, this Office recommends that the Commission find no reason to believe the Friends of Albert Gore, Jr. and William P. Puryear, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.14(d) with respect to the contributions from SPAD.

In the response on behalf of the Gore Committee, counsel noted that SPAD had initially reported the election designation for the December contribution incorrectly and that an amended report had been filed.

Marianne Rogers, treasurer of SPAD, submitted a response on their behalf. She reiterated that the two contributions from SPAD to the Gore Committee were each designated in writing, one for the primary election and the other for the general election. She also provided copies of the transmittal letters and cancelled checks. Attachment II(5) and (7).

Ms. Rogers provided copies of the relevant disclosure reports filed by SPAD. The contribution made in June was properly reported on the monthly report for that period and indicated that it was for the 1984 primary election. Attachment II(11). Ms. Rogers stated that, due to a clerical error, the December contribution was incorrectly reported for the primary election in the disclosure report covering that period. Attachment II(2) and (15). That report was amended by the assistant treasurer to correctly disclose that the December contribution was designated for the 1984 general election. Attachment II(19). SPAD filed that amendment on October 11, 1984, prior to the filing of the complaint in this matter.

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Based on the foregoing, this Office recommends that the Commission find no reason to believe SPAD and Marianne Rogers, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A). This Office also recommends that the Commission find reason to believe SPAD and Marianne Rogers, as treasurer, violated 11 C.F.R. § 104.14(d) for failing to report accurate information in a timely manner, and take no further action.

**B. Allegations Concerning Contributions from ACTWU-PAC**

The complaint alleged that the Gore Committee received a total of \$6,000 from ACTWU-PAC for the 1984 general election. The complaint further alleged that the Gore Committee inaccurately reported a \$200 contribution from ACTWU-PAC by designating it for the primary election, while ACTWU-PAC had designated it for the general election.

The complaint alleged that ACTWU-PAC exceeded the contribution limitation by making a \$6,000 contribution to the 1984 general election campaign of the Gore Committee.

In his response, counsel for the Gore Committee stated that all of the contributions received from ACTWU-PAC were undesignated and, in compliance with 11 C.F.R. § 110.2(a)(1), the contributions received prior to the primary election were designated for that election on the respective disclosure reports. Attachment I(8)-(9), (26) and (28). A contribution of \$200 was received on November 26, 1983, and another in the amount of \$800 was received on December 30, 1983. A copy of a page from

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the Gore Committee's disclosure report showed that these contributions were properly reported.<sup>8/</sup> Attachment I(30).

Counsel for the Gore Committee further stated in the response that ACTWU-PAC made the undesignated contribution of \$5,000 to the Gore Committee on August 22, 1984, after the primary election, and therefore, it was reported for the 1984 general election. Attachment I(10). A copy of the page from the disclosure report covering the period of that contribution was submitted. Attachment I(32). Counsel noted that ACTWU-PAC made a mistake in its reporting of some of the contributions, but argued that the recipient committee should not be held liable for such mistakes. Attachment I(10)-(12).

Based on the foregoing, this Office recommends that the Commission find no reason to believe the Gore Committee and William P. Puryear, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.14(d) with respect to the contributions received from ACTWU-PAC.

The response submitted through counsel on behalf of ACTWU-PAC and Charles Sallee, as treasurer corroborated the assertions made on behalf of the Gore Committee. Attachment III(1)-(4). Counsel stated, however, that due to a clerical error the \$200 contribution made in November 1983 was inadvertently reported for the general election on the 1983 December Monthly Report.

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<sup>8/</sup> Counsel noted that ACTWU-PAC contributed a total of \$2,600 to the Gore Committee for the 1984 primary election. Attachment I(9).

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Attachment III(7). ACTWU-PAC filed an amendment to that report, dated February 12, 1988, wherein it changed the designation to the primary election. Attachment III(8). The amended report was received by the Commission on February 20, 1988, prior to the

filing of the complaint in this matter; however, there was a five year delay in filing such amendment.

The complaint also alleged that ACTWU-PAC failed to report the \$800 contribution made in December 1983, to the Gore Committee. This disbursement was properly disclosed by ACTWU-PAC in its 1983 Year-End Report. Copies of the relevant page from that report, the cancelled check, and the transmittal letter were submitted as evidence. Attachment III(9)-(11).

This Office recommends that the Commission find no reason to believe ACTWU-PAC and Charles Sallee, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A). However, this Office recommends that the Commission find reason to believe ACTWU-PAC and Charles Sallee, as treasurer, violated 11 C.F.R. § 104.14(d) for failing to report accurate information in a timely manner with respect to the 1983 December Monthly Report, and take no further action.

**C. Allegations Concerning Contributions from ATU-COPE**

Finally, the complaint alleged that the Gore Committee received \$6,000 for the general election from ATU-COPE, and that it failed to accurately report several of those contributions, totalling \$3,500, for the general election. The complaint alleged, in turn, that ATU-COPE exceeded the \$5,000 contribution limitation for the general election.

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The Gore Committee responded that all of the contributions from ATU-COPE for the 1984 election cycle were undesignated. Therefore, in compliance with 11 C.F.R. § 110.2(a)(1), the contributions received before the primary election were reported in the Gore Committee's disclosure reports for such election. The contributions received prior to the primary election totalled \$3,500. One contribution of \$2,500 was received from ATU-COPE after the primary election and was, therefore, reported for the general election. Attachment I(12)-(15). It was noted, however, that ATU-COPE may have inaccurately reported the election designations for the pre-primary contributions. The Gore Committee provided copies of the checks, transmittal letters, and relevant pages from its disclosure reports to substantiate its assertions. Attachment I(34)-(50).

Based on the foregoing, this Office recommends that the Commission find no reason to believe the Gore Committee and William P. Puryear, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.14(d) with respect to the contributions received from ATU-COPE.

The response submitted by ATU-COPE corroborated the facts as presented by the Gore Committee. Attachment IV(1)-(3). ATU-COPE conceded that it had erroneously reported the election designation for the contributions made to the Gore Committee prior to the primary election. ATU-COPE stated that the intention was to give those contributions, totalling \$3,500, for the benefit of the primary election campaign, and, since each

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such contribution was undesignated and given prior to the date of the primary election, they were clearly for such election.

ATU-COPE provided copies of the disclosure reports wherein it erroneously reported the contributions made prior to the primary election, along with copies of the cancelled checks. Attachment IV(4)-(24). On March 18, 1988, apparently following receipt of the complaint in this matter, ATU-COPE filed amendments to the appropriate disclosure reports to accurately show the election designation for each contribution made to the primary election campaign of the Gore Committee. Copies of these amendments were provided. Attachment IV(26)-(34).

Based on the foregoing, this Office recommends that the Commission find no reason to believe ATU-COPE and Raymond C. Wallace, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A). However, due to the inaccurate reporting of certain contributions and the lengthy period of time taken by ATU-COPE to amend its reports (approximately 5 years), this Office recommends that the Commission find reason to believe ATU-COPE and Mr. Wallace, as treasurer, violated 11 C.F.R. § 104.14(d), and take no further action.

**D. Allegations Pertaining to Senator Gore**

In connection with all of the contributions discussed above, there is no evidence presented in the complaint or in the different responses to substantiate that Senator Gore, as an agent for his principal campaign committee, accepted excessive contributions. Therefore, this Office recommends that the

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Commission find no reason to believe Senator Albert Gore, Jr., violated 2 U.S.C. § 441a(f).

**III. RECOMMENDATIONS**

1. Find no reason to believe Senator Albert Gore, Jr., violated 2 U.S.C. § 441a(f).
2. Find no reason to believe Friends of Albert Gore, Jr. and William P. Puryear, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.14(d).
3. Find no reason to believe Amalgamated Transit Union - COPE and Raymond C. Wallace, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).
4. Find reason to believe Amalgamated Transit Union - COPE and Raymond C. Wallace, as treasurer, violated 11 C.F.R. § 104.14(d), and take no further action.
5. Find no reason to believe Amalgamated Clothing and Textile Workers Union - Political Action Committee and Charles Sallee, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).
6. Find reason to believe Amalgamated Clothing and Textile Workers Union - Political Action Committee and Charles Sallee, as treasurer, violated 11 C.F.R. § 104.14(d), and take no further action.
7. Find no reason to believe Seafarers Political Activity Donation and Marianne Rogers, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).
8. Find reason to believe Seafarers Political Activity Donation and Marianne Rogers, as treasurer, violated 11 C.F.R. § 104.14(d), and take no further action.
9. Approve the attached letters.
10. Close the file.

Lawrence M. Noble  
General Counsel

Date

5/6/88

BY:

Lois G. Lerner

Associate General Counsel

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**Attachments**

1. Response from Senator Gore, the Gore Committee and its treasurers
2. Response from SPAD
3. Response from ACTWU-PAC
4. Response from ATU-COPE
5. Letters(5)

Staff Person: Sandra H. Robinson

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

Senator Albert Gore, Jr. )

MUR 2584

Friends of Albert Gore, Jr. )  
and William P. Puryear, as treasurer )

Amalgamated Transit Union-COPE )  
and Raymond C. Wallace, as treasurer )

Amalgamated Clothing and Textile Workers )  
Union )

Amalgamated Clothing and Textile Workers )  
Union-Political Action Committee and )  
Charles Sallee, as treasurer )

Seafarers Political Activity Donation )  
and Marianne Rogers, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 11, 1988, the Commission decided by a vote of 5-0 to take the following actions in MUR 2584:

1. Find no reason to believe Senator Albert Gore, Jr., violated 2 U.S.C. § 441a(f).
2. Find no reason to believe Friends of Albert Gore, Jr. and William P. Puryear, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.14(d).
3. Find no reason to believe Amalgamated Transit Union - COPE and Raymond C. Wallace, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).
4. Find reason to believe Amalgamated Transit Union - COPE and Raymond C. Wallace, as treasurer, violated 11 C.F.R. § 104.14(d), and take no further action.

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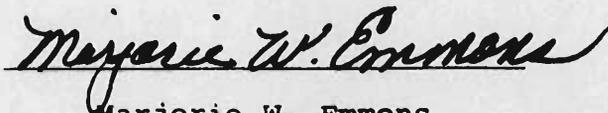
5. Find no reason to believe Amalgamated Clothing and Textile Workers Union - Political Action Committee and Charles Sallee, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).
6. Find reason to believe Amalgamated Clothing and Textile Workers Union - Political Action Committee and Charles Sallee, as treasurer, violated 11 C.F.R. § 104.14(d), and take no further action.
7. Find no reason to believe Seafarers Political Activity Donation and Marianne Rogers, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).
8. Find reason to believe Seafarers Political Activity Donation and Marianne Rogers, as treasurer, violated 11 C.F.R. § 104.14(d), and take no further action.
9. Approve the letters, as recommended in the General Counsel's report signed May 6, 1988.
10. Close the file.

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

Attest:

5-11-88

Date



Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary: Fri., 5-6-88, 4:31  
Circulated on 48 hour tally basis: Mon., 5-9-88, 4:00  
Deadline for vote: Wed., 5-11-88, 4:00  
jm



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 16, 1988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

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

RE: MUR 2584

Dear Mr. Avakian:

On May 11, 1988, the Federal Election Commission reviewed the allegations of the complaint of your client, Ray O. Brooks, Jr., dated March 1, 1988, and found that, on the basis of the information provided in your complaint and information provided by the respondents, there is no reason to believe Senator Albert Gore, Jr., violated 2 U.S.C. § 441a(f) or that Friends of Albert Gore, Jr. and William P. Puryear, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.14(d). On that same date, the Commission found no reason to believe Seafarers Political Activity Donation and Marianne Rogers, as treasurer; Amalgamated Transit Union - COPE and Raymond C. Wallace, as treasurer; and Amalgamated Clothing and Textile Workers Union - Political Action Committee and Charles Sallee, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

On May 11, 1988, the Commission also found reason to believe Seafarers Political Activity Donation and Marianne Rogers, as treasurer; Amalgamated Transit Union - COPE and Raymond C. Wallace, as treasurer; and Amalgamated Clothing and Textile Workers Unions - Political Action Committee and Charles Sallee, as treasurer, violated 11 C.F.R. § 104.14(d). However, after considering the circumstances of this matter, the Commission determined to take no further action against Seafarers Political Activity Donation and Marianne Rogers, as treasurer; Amalgamated Transit Union - COPE and Raymond C. Wallace, as treasurer; and Amalgamated Clothing and Textile Workers Union - Political Action Committee and Charles Sallee, as treasurer.

Accordingly, on May 11, 1988, the Commission closed the file in this matter. The Federal Election Campaign Act of 1971, as amended ("the Act"), allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

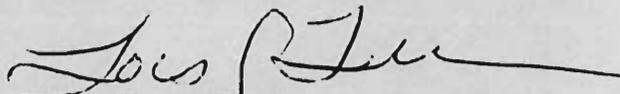
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Michael Ernest Avakian  
Page 2

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a) (1) and 11 C.F.R. § 111.4.

Sincerely,

Lawrence M. Noble  
General Counsel



BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
General Counsel's Report

cc: Ray O. Brooks, Jr.  
1020 Suzanne Avenue  
Knoxville, Tennessee 37920

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plm



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 16, 1988

Donald J. Simon, Esquire  
Sonosky, Chambers & Sachse  
1250 Eye Street, N.W., Suite 1000  
Washington, D.C. 20005

RE: MUR 2584  
Senator Albert Gore, Jr.;  
Friends of Albert Gore,  
Jr. and William P.  
Puryear, as treasurer

Dear Mr. Simon:

On March 8, 1988, the Federal Election Commission notified your clients, Senator Albert Gore, Jr., Friends of Albert Gore, Jr. and William P. Puryear, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On May 11, 1988, the Commission found, on the basis of the information in the complaint and information provided by your clients, that there is no reason to believe Senator Albert Gore, Jr. violated 2 U.S.C. § 441a(f) and no reason to believe that Friends of Albert Gore, Jr. and William P. Puryear, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 104.14(d). Accordingly, the Commission closed its file in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
General Counsel's Report

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MJR # 2584

DATE FILMED 6/3/88 CAMERA NO. 2

CAMERAMAN K.A.U.

88040703956



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2524

DATE FILMED 6/3/88 CAMERA NO. 2

CAMERAMAN K.A.U.

88040703957



FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

*✓ N 4.25.84*

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC FILE OF CLOSED MUR 2584 .

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 1, 1988

Robert A. Molofsky, Esquire  
Amalgamated Transit Union  
5025 Wisconsin Avenue, N.W.  
Washington, D.C. 20016-4139

RE: MUR 2584  
Amalgamated Transit Union  
- COPE and Raymond C.  
Wallace, as treasurer

Dear Mr. Molofsky:

On March 8, 1988, the Federal Election Commission notified your clients, Amalgamated Transit Union - COPE and Raymond C. Wallace, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On May 11, 1988, the Commission found, on the basis of the information in the complaint and information provided by your clients, that there is no reason to believe Amalgamated Transit Union - COPE and Raymond C. Wallace, as treasurer, violated 2 U.S.C. § 441a(a) (2) (A).

On May 11, 1988, the Commission found reason to believe that your clients, Amalgamated Transit Union - COPE and Raymond C. Wallace, as treasurer, violated 11 C.F.R. § 104.14(d), a provision of the Commission's Regulations. Specifically, it appears that certain contributions made to the Friends of Albert Gore, Jr. Committee were reported inaccurately and amendments to such reports were not filed in a timely manner. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file. The Commission reminds you, however, that inaccurate reporting is a violation of 11 C.F.R. § 104.14(d). Your clients should take immediate steps to insure that this activity does not occur in the future.

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 ten days of your receipt of this letter. Please send such materials to the General Counsel's Office.

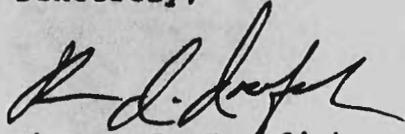
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Robert A. Molofsky  
Page 2

If you have any questions, please direct them to Sandra H. Robinson, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Thomas J. Josefiak  
Chairman

Enclosure  
General Counsel's Report

88040712650



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 1, 1988

Marianne Rogers, Treasurer  
Seafarers Political Activity Donation  
5201 Auth Way  
Camp Springs, Maryland 20746

RE: MUR 2584  
Seafarers Political  
Activity Donation and  
Marianne Rogers, as  
treasurer

Dear Ms. Rogers:

On March 8, 1988, the Federal Election Commission notified Seafarers Political Activity Donation ("Committee") and you, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On May 11, 1988, the Commission found, on the basis of the information in the complaint and information provided by you, that there is no reason to believe Seafarers Political Activity Donation and you, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

On May 11, 1988, the Commission found reason to believe that Seafarers Political Activity Donation and you, as treasurer, violated 11 C.F.R. § 104.14(d), a provision of the Commission's Regulations. Specifically, it appears that a contribution made to the Friends of Albert Gore, Jr., Committee was reported inaccurately and an amendment to such report was not filed in a timely manner. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file. The Commission reminds you, however, that inaccurate reporting is a violation of 11 C.F.R. § 104.14(d). Your clients should take immediate steps to insure that this activity does not occur in the future.

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 ten days of your receipt of this letter. Please send such materials to the General Counsel's Office.

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Marianne Rogers  
Page 2

If you have any questions, please direct them to Sandra H. Robinson, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Thomas J. Josefiak  
Chairman

Enclosure  
General Counsel's Report

38040712652



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 1, 1988

Jean Grumet, Esquire  
Amalgamated Clothing and  
Textile Workers Union  
15 Union Square  
New York, New York 10003-3377

RE: MUR 2584  
Amalgamated Clothing and  
Textile Workers Union -  
Political Action  
Committee and Charles  
Sallee, as treasurer

Dear Ms. Grumet:

On March 8, 1988, the Federal Election Commission notified your clients, Amalgamated Clothing and Textile Workers Union - Political Action Committee and Charles Sallee, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On May 11, 1988, the Commission found, on the basis of the information in the complaint and information provided by your clients, that there is no reason to believe Amalgamated Clothing and Textile Workers Union - Political Action Committee and Charles Sallee, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

On May 11, 1988, the Commission found reason to believe that your clients, Amalgamated Clothing and Textile Workers Union - Political Action Committee and Charles Sallee, as treasurer, violated 11 C.F.R. § 104.14(d), a provision of the Commission's Regulations. Specifically, it appears that certain contributions made to the Friends of Albert Gore, Jr., Committee were reported inaccurately and amendments to such reports were not filed in a timely manner. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file. The Commission reminds you, however, that inaccurate reporting is a violation of 11 C.F.R. § 104.14(d). Your clients should take immediate steps to insure that this activity does not occur in the future.

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Jean Grumet ..  
Page 2

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 ten days of your receipt of this letter. Please send such materials to the General Counsel's Office.

If you have any questions, please direct them to Sandra H. Robinson, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Thomas J. Josefiak  
Chairman

Enclosure  
General Counsel's Report

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