



FEDERAL ELECTION COMMISSION

125 K STREET NW
WASHINGTON, D.C. 20461

THIS IS THE END OF TMR # 534

Date Filmed 2/8/79 Camera No. --- 2

Cameraman JPC

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7904010008

FEDERAL ELECTION COMMISSION

*Minutes of a Meeting of Independent
Board of Directors*

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

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

Signed _____
date _____

FEC 9-21-77

7901010084

FEDERAL ELECTION COMMISSION

General Counsel's Report

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

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

Signed

Gary R. Lyster

date

1/12/79

79040100095



FEDERAL ELECTION COMMISSION

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

January 11, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles E. Yates, Esquire
Moriarty, Long, Mikkelborg and Bros
3300 Seattle - First National Bank Building
Seattle, Washington 98154

Re: MUR 534(78)

Dear Mr. Yates:

Enclosed are copies of the conciliation agreements
in this matter. As the Commission has approved, and I
have signed, these agreements, the matter is now closed.

Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script, appearing to read "William C. Oldaker".

William C. Oldaker
General Counsel

Enclosures

79040100085

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles S. Yates, Seattle
Moriarty, Long, & Moriarty
3300 Seattle - First Avenue
Seattle, Washington 98101

NOV 19 1947

Dear Mr. Yates:

Enclosed are copies of the conciliation agreements
in this matter. As the Commission has approved, and I
have signed, these agreements, the matter is now closed.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

79040100087

1/10/48

BEFORE THE FEDERAL ELECTION COMMISSION
October 31, 1978

In the Matter of)
) MUR 534 (78)
Puget Sound Gillnetters)
Political Action Committee)

CONCILIATION AGREEMENT

This matter, having been internally generated, and reasonable cause to believe having been found that the respondent Puget Sound Gillnetters Political Action Committee (hereinafter PAC), violated 2 U.S.C. §441b(a).

Now therefore, the respective parties herein, the Federal Election Commission and the respondent PAC, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(5), do hereby agree as follows:

I. That the Federal Election Commission has jurisdiction over the respondent and the subject matter of this proceeding.

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

III. That the pertinent facts in this matter are as follows:

A. Respondent is a political action committee sponsored by the Puget Sound Gillnetters Association.

B. That the respondent, in early 1977, knowingly received and accepted a direct transfer of eleven hundred dollars (\$1,100) from the general corporate treasury of the Puget Sound Gillnetters Association.

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IV. It is agreed that the respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained therein and to so notify the Commission.

1/11/79
Date

William C. Oldaker
William C. Oldaker
General Counsel

Puget Sound Gillnetters
Political Action Committee

By: *Ben L. Cain*
For the Respondent

79040100090

BEFORE THE FEDERAL ELECTION COMMISSION
October 31, 1978

In the Matter of)
)
Puget Sound Gillnetters) MUR 534 (78)
Association)

CONCILIATION AGREEMENT

This matter, having been internally generated, and reasonable cause to believe having been found that the respondent, Puget Sound Gillnetters Association (hereinafter PSGA), violated 2 U.S.C. §441b(a).

Now therefore, the respective parties herein, the Federal Election Commission and the respondent PSGA, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(5), do hereby agree as follows:

I. That the Federal Election Commission has jurisdiction over the respondent and the subject matter of this proceeding.

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

III. That the pertinent facts in this matter are as follows:

A. Respondent is an incorporated association in the Puget Sound area.

B. Respondent sponsored a group known as the Puget Sound Gillnetters Political Action Committee (PAC).

C. That the respondent, in January 1977, decided to support an individual running for a seat in the U.S. Congress, whereupon its Board of Directors authorized a direct transfer of eleven hundred dollars (\$1,100) from the treasury of PSGA to the PAC.

79040100091

D. That this fund transfer was made.

E. That these monies were not the proceeds of voluntary contributions received for the support of the PAC.

WHEREFORE, respondent agrees:

IV. That this fund transfer was a contribution or expenditure made in connection with a Federal election within the meaning of 2 U.S.C. §441b(b)(2)(A).

V. That this fund transfer was, accordingly, a violation of 2 U.S.C. §441b(a).

VI. That it will pay a civil penalty in the amount of three hundred seventy-five dollars (\$375) pursuant to 2 U.S.C. §437g(a)(6)(B).

GENERAL CONDITIONS:

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

II. This agreement shall in no manner be construed as an admission by the respondent that it knowingly violated any provision of the Federal Election Campaign Act of 1971, as amended.

III. It is mutually agreed that this agreement shall become effective as of the date that all parties have executed same and the Commission approves the entire agreement.

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III. It is agreed that the respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained therein and to so notify the Commission.

1/11/79
Date

William C. Oldaker
William C. Oldaker
General Counsel

Puget Sound Gillnetters
Association

By Philip V. Sutherland
For the Respondent

79040100093

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 534 (78)
Puget Sound Gillnetters)
Political Action Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on January 9, 1979, the Commission gave final approval by a vote of 5-0 to the two conciliation agreements signed by the respective respondents which were attached to the General Counsel's Memorandum dated January 5, 1979.

Voting for this determination were Commissioners Springer, Aikens, McGarry, Thomson, and Harris.

Attest:

1/9/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 1-5-79, 11:06
Circulated on 48 hour vote basis: 1-5-79, 3:00

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January 5, 1979

MEMORANDUM TO: Harge Bahine
FROM: Eliana T. Spad
SUBJECT: MUR 534

Please have the attached memo to the Commission on
MUR 534 distributed to the Commission on a 48 hour tally
basis.

Thank you.

79040100095



FEDERAL ELECTION COMMISSION

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

RECEIVED
OFFICE OF THE
COMMISSIONER SECRETARY

79 JAN 5 AM 1:08

January 5, 1979

MEMORANDUM

TO: The Commission
FROM: William C. Oldaker *W.C.O.*
DATE: December 22, 1978
RE: Conciliation Agreements in MUR 534(78)

Attached hereto are the two previously approved conciliation agreements in this matter signed by the respective respondents. As we have received a check in full payment of the penalties imposed, we are circulating these agreements for final approval prior to my signature.

ATTACHMENTS

- Signed Conciliation Agreements (2)
- Letter to respondent's counsel

7904010096

BEFORE THE FEDERAL ELECTION COMMISSION
October 31, 1978

In the Matter of)
Puget Sound Gillnetters) MUR 534 (78)
Political Action Committee)

CONCILIATION AGREEMENT

This matter, having been internally generated, and reasonable cause to believe having been found that the respondent Puget Sound Gillnetters Political Action Committee (hereinafter PAC), violated 2 U.S.C. §441b(a).

Now therefore, the respective parties herein, the Federal Election Commission and the respondent PAC, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(5), do hereby agree as follows:

I. That the Federal Election Commission has jurisdiction over the respondent and the subject matter of this proceeding.

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

III. That the pertinent facts in this matter are as follows:

A. Respondent is a political action committee sponsored by the Puget Sound Gillnetters Association.

B. That the respondent, in early 1977, knowingly received and accepted a direct transfer of eleven hundred dollars (\$1,100) from the general corporate treasury of the Puget Sound Gillnetters Association.

79040100097

C. That the respondent, on or about April 21, 1977, contributed one thousand dollars (\$1,000) of these funds to the Congressional Campaign of Marvin Durning.

WHEREFORE, respondent agrees:

IV. That the monies received from Puget Sound Gillnetters Association was a contribution made in connection with a Federal election within the meaning of 2 U.S.C. §441b(b)(2)(A).

V. That the respondents' acceptance and subsequent contribution of these monies was a violation of 2 U.S.C. §441b(a).

VI. That it will pay a civil penalty in the amount of three hundred seventy-five dollars (\$375) pursuant to 2 U.S.C. §437g(a)(6)(B).

GENERAL CONDITIONS:

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

II. This agreement shall in no manner be construed as an admission by the respondent that it knowingly violated any provision of the Federal Election Campaign Act of 1971, as amended.

III. It is mutually agreed that this agreement shall become effective as of the date that all parties have executed same and the Commission approved the entire agreement.

790100099

IV. It is agreed that the respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained therein and to so notify the Commission.

79040100099

_____ Date

_____ William C. Oldaker
General Counsel

Puget Sound Gillnetters
Political Action Committee

By: *Ben L. Cain*

_____ For the Respondent

BEFORE THE FEDERAL ELECTION COMMISSION
October 31, 1978

In the Matter of)
) MUR 534 (78)
Puget Sound Gillnetters)
Association)

CONCILIATION AGREEMENT

This matter, having been internally generated, and reasonable cause to believe having been found that the respondent, Puget Sound Gillnetters Association (hereinafter PSGA), violated 2 U.S.C. §441b(a).

Now therefore, the respective parties herein, the Federal Election Commission and the respondent PSGA, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(5), do hereby agree as follows:

I. That the Federal Election Commission has jurisdiction over the respondent and the subject matter of this proceeding.

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

III. That the pertinent facts in this matter are as follows:

A. Respondent is an incorporated association in the Puget Sound area.

B. Respondent sponsored a group known as the Puget Sound Gillnetters Political Action Committee (PAC).

C. That the respondent, in January 1977, decided to support an individual running for a seat in the U.S. Congress, whereupon its Board of Directors authorized a direct transfer of eleven hundred dollars (\$1,100) from the treasury of PSGA to the PAC.

79040100100

D. That this fund transfer was made.

E. That these monies were not the proceeds of voluntary contributions received for the support of the PAC.

WHEREFORE, respondent agrees:

IV. That this fund transfer was a contribution or expenditure made in connection with a Federal election within the meaning of 2 U.S.C. §441b(b) (2) (A).

V. That this fund transfer was, accordingly, a violation of 2 U.S.C. §441b(a).

VI. That it will pay a civil penalty in the amount of three hundred seventy-five dollars (\$375) pursuant to 2 U.S.C. §437g(a) (6) (B).

GENERAL CONDITIONS:

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

II. This agreement shall in no manner be construed as an admission by the respondent that it knowingly violated any provision of the Federal Election Campaign Act of 1971, as amended.

III. It is mutually agreed that this agreement shall become effective as of the date that all parties have executed same and the Commission approves the entire agreement.

79040100101

III. It is agreed that the respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained therein and to so notify the Commission.

Date

William C. Oldaker
General Counsel

Puget Sound Gillnetters
Association

By

Philip Sutherland

For the Respondent

79040100102



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles E. Yates, Esquire
Moriarty, Long, Mikkelsen and Broz
3300 Seattle - First National Bank Building
Seattle, Washington 98154

Re: MUR 534(78)

Dear Mr. Yates:

Enclosed are copies of the conciliation agreements in this matter. As the Commission has approved, and I have signed, these agreements, the matter is now closed.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

Enclosures



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE
FROM: MARJORIE W. EMMONS *MJE*
DATE: JANUARY 4, 1979
SUBJECT: MUR 534 (78) - Interim Conciliation Report
dated 12-20-78; Signed
12-26-78; Received in OCS
1-2-79, 2:45

The above-named document was circulated on a 24
hour no-objection basis at 11:00, January 3, 1979.

The Commission Secretary's Office has received
no objections to the Interim Conciliation Report as of
12:00, this date.

79040100104

January 2, 1976

MEMORANDUM TO: Major General
FROM: Michael J. Galt
SUBJECT: 200-204

Please have the attached Taxation Consultation Report on EIR 204 distributed to the Commission on a 24 hour no-objection basis.
Thank you.

79040100105

BEFORE THE FEDERAL ELECTION COMMISSION
December 20, 1978

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

79 JAN 2 P 2: 45

In the Matter of)
)
Puget Sound Gillnetters)
Association)
Puget Sound Gillnetters)
Political Action Committee)

MUR 534 (78)

INTERIM CONCILIATION REPORT

Counsel for the respondents has informed us that the approved conciliation agreements in this matter are acceptable. The signed agreements are expected to be received shortly.

79040100106

26 December 1978
Date



William C. Oldaker
General Counsel

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5949

LAW OFFICES
MORIARTY, MIKKELBORG, BROZ, WELLS & FRYER

CHARLES P. MORIARTY, JR.
JACOB A. MIKKELBORG
RICHARD F. BROZ
ROBERT D. WELLS, JR.
DOUGLAS M. FRYER
R. THOMAS OLSON
ROBERT J. VALERIUS

3300 SEATTLE-FIRST NATIONAL BANK BUILDING
SEATTLE, WASHINGTON 98108
(206) 623-6690

RECEIVED
FEDERAL ELECTION COMMISSION

78 DEC 21 AM 11:35

CHARLES E. YATES
DOUGLAS M. DUNCAN
PAMELA A. GHANO
ALEXANDER W. WIRT
ALAN W. BRINDLE
PARTNER ON LEAVE

December 15, 1978

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

800503

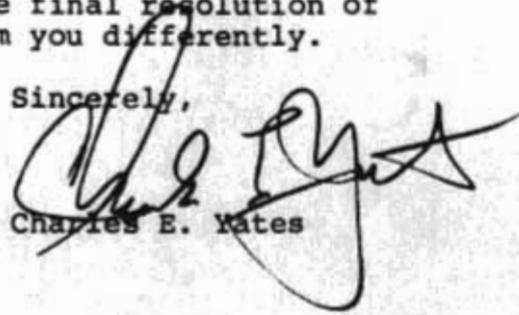
Re: Your Number MUR 534(78)

Dear Gary:

Enclosed in final compromise of the above matter is the Conciliation Agreement on behalf of both the Puget Sound Gillnetters Association and the Puget Sound Gillnetters Political Action Committee. Also enclosed is a check for \$750.00 covering the penalty assessed pursuant to this agreement.

I will assume that this is the final resolution of this matter unless I hear from you differently.

Sincerely,



Charles E. Yates

CEY/cjj
Enc.

cc: Puget Sound Gillnetters
Association

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PUGET SOUND
GILNETTERS ASSOCIATION
FISHERMAN'S TERMINAL
BLDG. C-3 ROOM 103 284-8520
SEATTLE, WASHINGTON 98119

1383

Dec. 13, 1978

1978
12/13

PAY
TO THE
ORDER OF

Federal Election Commission

\$ 750⁰⁰

FSGA >>> 750 000 500 000

DOLLARS

RAINIERBANK
Seattle Pacific Office Seattle, WA 98119
RAINIER NATIONAL BANK

BY Philip S. Sutherland
Chad Dimmick

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FEDERAL ELECTION COMMISSION

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

November 24, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles E. Yates, Esquire
Moriarty, Long, Mikkelsen and Broz
3300 Seattle - First National Bank
Building
Seattle, Washington 94154

Re: MUR 534 (78)

Dear Mr. Yates:

Enclosed herein are revised versions of the conciliation agreements which the Commission is prepared to accept in the above-referenced matter.

If you have any questions, please contact Gary D. Lipkin at 202-523-4175.

Thank you for your cooperation.

Sincerely yours,

William C. Oldaker
Counsel

79040107110

Lipkin MUR-534

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

1. The following service is requested (check one).
 Show to whom and date delivered.
 Show to whom, date, and address of delivery.
 RESTRICTED DELIVERY
 Show to whom and date delivered.
 RESTRICTED DELIVERY
 Show to whom, date, and address of delivery.
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: Charles E. Yates, Esq., 3300 Seattle - 1st Nat. Bank Bldg., Seattle, Wash. 94154

3. ARTICLE DESCRIPTION: REGISTERED NO. 488805 CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent.)
 I have received the article described above.
 SIGNATURE: *G. D. Lipkin* ADDRESS: Address Authorized Agent

DATE OF DELIVERY: NOV 28 1978

5. ADDRESS: (Postage paid by addressee)
 6. UNABLE TO DELIVER BECAUSE: POSTAL

BEFORE THE FEDERAL ELECTION COMMISSION
October 31, 1978

In the Matter of)
)
Puget Sound Gillnetters) MUR 534 (78)
Association)

CONCILIATION AGREEMENT

This matter, having been internally generated, and reasonable cause to believe having been found that the respondent, Puget Sound Gillnetters Association (hereinafter PSGA), violated 2 U.S.C. §441b(a).

Now therefore, the respective parties herein, the Federal Election Commission and the respondent PSGA, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(5), do hereby agree as follows:

I. That the Federal Election Commission has jurisdiction over the respondent and the subject matter of this proceeding.

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

III. That the pertinent facts in this matter are as follows:

A. Respondent is an incorporated association in the Puget Sound area.

B. Respondent sponsored a group known as the Puget Sound Gillnetters Political Action Committee (PAC).

C. That the respondent, in January 1977, decided to support an individual running for a seat in the U.S. Congress, whereupon its Board of Directors authorized a direct transfer of eleven hundred dollars (\$1,100) from the treasury of PSGA to the PAC.

790101111

D. That this fund transfer was made.

E. That these monies were not the proceeds of voluntary contributions received for the support of the PAC.

WHEREFORE, respondent agrees:

IV. That this fund transfer was a contribution or expenditure made in connection with a Federal election within the meaning of 2 U.S.C. §441b(b)(2)(A).

V. That this fund transfer was, accordingly, a violation of 2 U.S.C. §441b(a).

VI. That it will pay a civil penalty in the amount of three hundred seventy-five dollars (\$375) pursuant to 2 U.S.C. §437g(a)(6)(B).

GENERAL CONDITIONS:

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

II. This agreement shall in no manner be construed as an admission by the respondent that it knowingly violated any provision of the Federal Election Campaign Act of 1971, as amended.

III. It is mutually agreed that this agreement shall become effective as of the date that all parties have executed same and the Commission approves the entire agreement.

79040100112

III. It is agreed that the respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained therein and to so notify the Commission.

Date

William C. Oldaker
General Counsel

Puget Sound Gillnetters
Association

By:

For the Respondent

79010100113

BEFORE THE FEDERAL ELECTION COMMISSION
October 31, 1978

In the Matter of)
Puget Sound Gillnetters) MUR 534 (78)
Political Action Committee)

CONCILIATION AGREEMENT

This matter, having been internally generated, and reasonable cause to believe having been found that the respondent Puget Sound Gillnetters Political Action Committee (hereinafter PAC), violated 2 U.S.C. §441b(a).

Now therefore, the respective parties herein, the Federal Election Commission and the respondent PAC, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(5), do hereby agree as follows:

I. That the Federal Election Commission has jurisdiction over the respondent and the subject matter of this proceeding.

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

III. That the pertinent facts in this matter are as follows:

A. Respondent is a political action committee sponsored by the Puget Sound Gillnetters Association.

B. That the respondent, in early 1977, knowingly received and accepted a direct transfer of eleven hundred dollars (\$1,100) from the general corporate treasury of the Puget Sound Gillnetters Association.

79040100114

C. That the respondent, on or about April 21, 1977, contributed one thousand dollars (\$1,000) of these funds to the Congressional Campaign of Marvin Durning.

WHEREFORE, respondent agrees:

IV. That the monies received from Puget Sound Gillnetters Association was a contribution made in connection with a Federal election within the meaning of 2 U.S.C. §441b(b)(2)(A).

V. That the respondents' acceptance and subsequent contribution of these monies was a violation of 2 U.S.C. §441b(a).

VI. That it will pay a civil penalty in the amount of three hundred seventy-five dollars (\$375) pursuant to 2 U.S.C. §437g(a)(6)(B).

GENERAL CONDITIONS:

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

II. This agreement shall in no manner be construed as an admission by the respondent that it knowingly violated any provision of the Federal Election Campaign Act of 1971, as amended.

III. It is mutually agreed that this agreement shall become effective as of the date that all parties have executed same and the Commission approved the entire agreement.

79040100115

IV. It is agreed that the respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained therein and to so notify the Commission.

Date

William C. Oldaker
General Counsel

Puget Sound Gillnetters
Political Action Committee

By:

For the Respondent

79040100116

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Puget Sound Gillnetters)	MUR 534 (78)
Association)	
Puget Sound Gillnetters)	
Political Action Committee)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 21, 1978, the Commission determined by a vote of 6-0 to adopt the following recommendations, as set forth in the General Counsel's Report dated October 31, 1978, regarding the above-captioned matter:

1. Approve the revised conciliation agreements attached to the above-named report.
2. Approve the letter attached to the above-named report.

Attest:

11-21-78

Date

Margaret E. Chaney
 for Marjorie W. Emmons

Secretary to the Commission

Signed by the General Counsel:	11-15-78
Received in Office of Commission Secretary:	11-16-78, 12:53
Circulated on 48 hour vote basis:	11-17-78, 10:30

79040100117

November 14, 1978

MEMORANDUM TO: Marge Berman
FROM: Elissa T. Gorr
SUBJECT: MUR-534

Please have the attached General Counsel's Report on MUR-534 distributed to the Commission on a 48 hour tally basis.

Thank you.

79040100118

RECEIVED
OFFICE OF THE

COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

October 31, 1978

78 NOV 16 12: 53

In the Matter of)	
)	
Puget Sound Gillnetters)	MUR 534 (78)
Association)	
Puget Sound Gillnetters)	
Political Action Committee)	

GENERAL COUNSEL'S REPORT

I. Summary of Prior Proceedings and Analysis

This matter arose when, in the course of carrying out routine supervisory responsibilities, it was learned that eleven hundred dollars (\$1,100) in corporate funds had been transferred from the treasury of the Puget Sound Gillnetters Association (hereinafter PSGA) to the Puget Sound Gillnetters Political Action Committee (hereinafter PAC). Subsequently the PAC contributed one thousand dollars to a congressional campaign committee.

Reason to believe that both PSGA and the PAC violated 2 U.S.C. §441b(a) was found on April 19, 1978. Pursuant to the ensuing investigation, reasonable cause to believe was found on September 28, 1978 and proposals for conciliation was forwarded to the respondents (agreements attached as Exhibits 1 and 2).

Counsel for both of the respondents responded to our proposals by letter of October 16, 1978. The proposals are acceptable with two modifications. The changes proposed are summarized below.

7901010119

- I. Counsel requests that a clause be added to reflect that the actions of both PSGA and the PAC were done without an intent to knowingly and wilfully violate the Act.
- II. Counsel proposes that the penalty levied be reduced from \$1,000 from each respondent to \$375 from both PSGA and the PAC.

The first change proposed is minor and should be accepted by the Commission as a statement to this effect is clearly in concert with the facts of this matter.

The second proposed change, that of reducing the penalty, is a reasonable modification and the product of negotiation. As there was no intent to violate the Act in the instant matter and the respondent has committed no subsequent violations of the Act, it is recommended that this proposed reduction in the penalty be accepted.

RECOMMENDATIONS

- 1. Approve the attached revised conciliation agreements
- 2. Approve the attached letter

11/15/78
Date

William C. Oldaker
William C. Oldaker
General Counsel

Attachments:

- 1. conciliation agreements (two original proposals)
- 2. letter
- 3. conciliation agreements (two revised proposals)

79040100120

BEFORE THE FEDERAL ELECTION COMMISSION
September 22, 1978

old

In the Matter of)
)
Puget Sound Gillnetters) MUR 534 (78)
Association)

CONCILIATION AGREEMENT

This matter, having been internally generated, and reasonable cause to believe having been found that the respondent, Puget Sound Gillnetters Association (hereinafter PSGA), violated 2 U.S.C. §441b(a).

Now therefore, the respective parties herein, the Federal Election Commission and the respondent PSGA, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a) (5), do hereby agree as follows:

I. That the Federal Election Commission has jurisdiction over the respondent and the subject matter of this proceeding.

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

III. That the pertinent facts in this matter are as follows:

A. Respondent is an incorporated association in the Puget Sound area.

B. Respondent sponsored a group known as the Puget Sound Gillnetters Political Action Committee (PAC).

79040100121

C. That the respondent, in January 1977, decided to support an individual running for a seat in the U.S. Congress, whereupon its Board of Directors authorized a direct transfer of eleven hundred dollars (\$1,100) from the treasury of PSGA to the PAC.

D. That this fund transfer was made.

E. That these monies were not the proceeds of voluntary contributions received for the support of the PAC.

WHEREFORE, respondent agrees:

IV. That this fund transfer was a contribution or expenditure made in connection with a Federal election within the meaning of 2 U.S.C. §441b(b) (2) (A).

V. That this fund transfer was, accordingly, a violation of 2 U.S.C. §441b(a).

VI. That it will pay a civil penalty in the amount of one thousand dollars (\$1,000) pursuant to 2 U.S.C. §437g(a) (6) (B).

General Conditions:

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

79040100122

II. It is mutually agreed that this agreement shall become effective as of the date that all parties have executed same and the Commission approves the entire agreement.

III. It is agreed that the respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained therein and to so notify the Commission.

79040100123

Date

William C. Oldaker
General Counsel

Puget Sound Billnetters
Association

By:

For the Respondent

BEFORE THE FEDERAL ELECTION COMMISSION
September 22, 1978

In the Matter of)
) MUR 534 (78)
Puget Sound Gillnetters)
Political Action Committee)

old

CONCILIATION AGREEMENT

This matter, having been internally generated, and reasonable cause to believe having been found that the respondent Puget Sound Gillnetters Political Action Committee (hereinafter PAC), violated 2 U.S.C. §441b(a).

Now therefore, the respective parties herein, the Federal Election Commission and the respondent PAC, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(5), do hereby agree as follows:

I. That the Federal Election Commission has jurisdiction over the respondent and the subject matter of this proceeding.

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

III. That the pertinent facts in this matter are as follows:

A. Respondent is a political action committee sponsored by the Puget Sound Gillnetters Association.

B. That the respondent, in early 1977, knowingly received and accepted a direct transfer of eleven hundred dollars (\$1,100) from the general corporate treasury of the Puget Sound Gillnetters Association.

79040100124

C. That the respondent, on or about April 21, 1977, contributed one thousand dollars (\$1,000) of these funds to the Congressional Campaign of Marvin Durning.

WHEREFORE, respondent agrees:

IV. That the monies received from Puget Sound Gillnetters Association was a contribution made in connection with a Federal election within the meaning of 2 U.S.C. §441b(b)(2)(A).

V. That the respondents' acceptance and subsequent contribution of these monies was a violation of 2 U.S.C. §441b (a).

VI. That it will pay a civil penalty of one thousand dollars (\$1,000) pursuant to 2 U.S.C. §437g(a)(6)(B).

General Conditions:

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

II. It is mutually agreed that this agreement shall become effective as of the date that all parties have executed same and the Commission approved the entire agreement.

79010100125

III. It is agreed that the respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained therein and to so notify the Commission.

79040100126
Date _____

William C. Oldaker
General Counsel

Puget Sound Gillnetters
Political Action Committee

By:

For the Respondent



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles E. Yates, Esquire
Moriarty, Long, Mikkelsen and Broz
3300 Seattle - First National Bank
Building
Seattle, Washington 98104

Re: MUR 534(78)

Dear Mr. Yates:

Enclosed herein are revised versions of the conciliation agreements which the Commission is prepared to accept in the above-referenced matter.

If you have any questions, please contact Gary D. Lipkin at 202-523-4175.

Thank you for your cooperation.

Sincerely yours,

William C. Oldaker
General Counsel

Attachments

79040100127

800 5679

LAW OFFICES
MORIARTY, MIKKELBORG, BROZ, WELLS & FRYER

3300 SEATTLE-FIRST NATIONAL BANK BUILDING
SEATTLE, WASHINGTON 98104
(206) 823-8080

November 16, 1978

FEDERAL ELECTION COMMISSION

'78 NOV 24

CHARLES E. YATES
DOUGLAS M. DUNCAN
PAMELA A. CHANG
ALEXANDER W. BLUNT
ALEC W. BRINDLE
PARTNER ON LEAVE

CHARLES P. MORIARTY, JR.
JACOB A. MIKKELBORG
RICHARD F. BROZ
ROBERT D. WELLS, JR.
DOUGLAS M. FRYER
R. THOMAS OLSON
ROBERT J. WALERIUS

807975

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

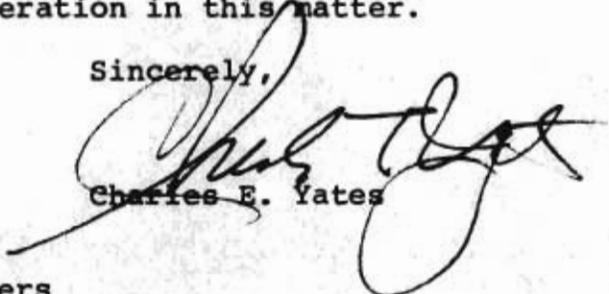
Re: Your Number MUR 534(78)

Dear Mr. Lipkin:

This letter will confirm my telephonic offer to compromise the above matter on the terms of my letter of October 16, 1978 with the modification that there be paid by the Association and the Committee the amount of \$375.00 each.

Thank you for your consideration in this matter.

Sincerely,



Charles E. Yates

CEY/cjj
cc: Puget Sound Gillnetters
Association

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300
5238

LAW OFFICES
MORIARTY, LONG, MIKKELBORG & BROZ
3300 SEATTLE-FIRST NATIONAL BANK BUILDING
SEATTLE, WASHINGTON 98184
(206) 923-8880

RECEIVED
FEDERAL ELECTION COMMISSION

68
'78 OCT 26 2 28 PM

CHARLES E. YATES
DOUGLAS M. DUNCAN
RICHARD A. GRAND
ALEXANDER W. HUNT
ALLEN W. BRIDLE
PARTNER OF DEAVE

CHARLES P. MORIARTY, JR.
JEREMIAH M. LONG
JACOB A. MIKKELBORG
RICHARD F. BROZ
ROBERT O. WELLS, JR.
DOUGLAS M. FRYER
R. THOMAS OLSON
ROBERT J. WALERIUS

October 16, 1978

807077

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

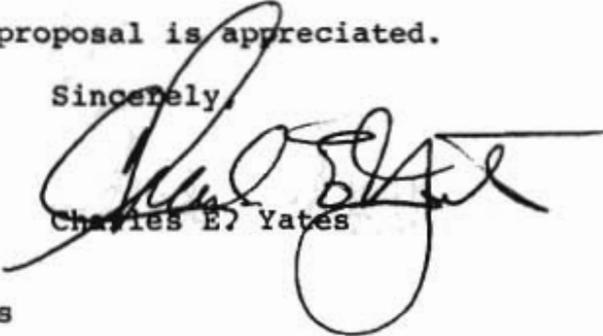
Re: Your Number MUR 534(78)

Dear Mr. Lipkin:

As I indicated to you in our phone conversation of October 13, 1978, your proposed conciliation agreements for the Puget Sound Gillnetters Political Action Committee and the Puget Sound Gillnetters Association are acceptable with two modifications. First, I think that they would accurately reflect the actions of both the Committee and the Association if the agreement indicated that all actions on the part of either the Committee or the Association were done without knowledge that any actions were in violation of any law. Secondly, I propose that the fine to be paid by the Committee and the Association be reduced to \$250.00 each. I think this is justified because (1) there was no intent to violate the law on the part of either the Committee or the Association, (2) the amount of contributions involved is small, and (3) the Committee and Association would find the payment of the proposed \$2,000.00 to be an extreme financial burden.

Your consideration of this proposal is appreciated.

Sincerely,



Charles E. Yates

CEY/cjj
cc: Puget Sound Gillnetters
Association

70010107130

LAW OFFICES

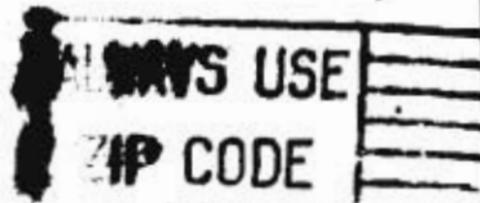
MORIARTY LONG, MIKKELBORG & BROZ

3300 SEATTLE FIRST NATIONAL BANK BUILDING

SEATTLE WASHINGTON 98154

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OCT 20 810:45



Mr. Gary D. Lipkin
Federal Election Commission
1325 K Street N.W.
WASHINGTON DC 20463

OCT 20 11:07



FEDERAL ELECTION COMMISSION

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

October 2, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ben Cain, Treasurer
Puget Sound Gillnetters Political
Action Committee
Fishermen's Terminal, C-3, Room 103
Seattle, Washington 98119

Re: MUR 534(78)

Dear Mr. Cain:

On October 28, 1978, the Commission determined there was reasonable cause to believe that your committee committed a violation of 2 U.S.C. 441b(a) of the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission found reasonable cause to believe that the acceptance of \$1,100 of general treasury funds from the Puget Sound Gillnetters Association and your committee's donation of \$1,000 of this money to the campaign of Marvin Durning violated the prohibitions of 2 U.S.C. 441b (a).

The Commission has a duty to attempt to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. 2 U.S.C. §437g(a)(5)(B). If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit in United States District Court and seek payment of a civil penalty not in excess of \$5,000.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission approve the agreement.

79040100132

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Gary D. Lipkin, the attorney assigned to this matter, at 202-523-4529.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

1. Conciliation Agreement

7 6 9 4 0 1 0 9 1 3 3

Lipkin *MUR-534(78)*

PS Form 3811, Nov 1977 RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

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

1. The following service is requested (check one).
 Show to whom and date delivered. _____
 Show to whom, date, and address of delivery. _____
 RESTRICTED DELIVERY Show to whom and date delivered. _____
 RESTRICTED DELIVERY Show to whom, date, and address of delivery. _____
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO
Ben Cain, Treasurer
Fisherman's Terminal, C-3, Rm. 163
Seattle, Wash 98119

3. ARTICLE DESCRIPTION
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | *943460* | |
 (Always obtain signature of addressee or agent)

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

DATE OF DELIVERY *10/5/78* POSTMARK

4. ADDRESS (Complete only if requested)

5. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

© 1977 - 9-249-000



FEDERAL ELECTION COMMISSION

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

October 2, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Philip G. Sutherland, President
Puget Sound Gillnetters Association
Fishermen's Terminal, C-3
Seattle, Washington 98119

Re: MUR 534(78)

Dear Mr. Sutherland:

On October 28, 1978, the Commission determined there was reasonable cause to believe that your association committed a violation of 2 U.S.C. §441b(a) of the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission found reasonable cause to believe that the direct transfer of \$1,100 from the association's treasury to the Puget Sound Gillnetters Political Action Committee violated the provisions of 2 U.S.C. §441b(a).

The Commission has a duty to attempt to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. 2 U.S.C. §437g(a)(5)(B). If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit in United States District Court and seek payment of a civil penalty not in excess of \$5000.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission approve the agreement.

79040100134

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Gary D. Lipkin, the attorney assigned to this matter, at 202-523-4529.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

- 1. Conciliation Agreement

79040100135

Lipkin *MUP-584(28)*

PS Form 3811, Apr 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. The following service is requested (check one).
 Show to whom and date delivered \$
 Show to whom, date, and address of delivery \$
 RESTRICTED DELIVERY
 Show to whom and date delivered \$
 RESTRICTED DELIVERY
 Show to whom, date, and address of delivery \$
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Philip G. Surber, President
Fishermen's Terminal, C-3
Seattle, Wash. 98119

3. ARTICLE DESCRIPTION:
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | *943461* | |

(Always obtain signature of addressee or agent)

I have received this article described above.
 SIGNATURE Addressee Authorized agent
Jerry Proio

DATE OF DELIVERY *10/5/78* | POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: | CLERK'S INITIALS

4875-107-2-50-88

BEFORE THE FEDERAL ELECTION COMMISSION
September 22, 1978

In the Matter of)
)
Puget Sound Gillnetters) MUR 534 (78)
Association)

CONCILIATION AGREEMENT

This matter, having been internally generated, and reasonable cause to believe having been found that the respondent, Puget Sound Gillnetters Association (hereinafter PSGA), violated 2 U.S.C. §441b(a).

Now therefore, the respective parties herein, the Federal Election Commission and the respondent PSGA, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a) (5), do hereby agree as follows:

I. That the Federal Election Commission has jurisdiction over the respondent and the subject matter of this proceeding.

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

III. That the pertinent facts in this matter are as follows:

A. Respondent is an incorporated association in the Puget Sound area.

B. Respondent sponsored a group known as the Puget Sound Gillnetters Political Action Committee (PAC).

79040100136

BEFORE THE FEDERAL ELECTION COMMISSION
September 22, 1978

In the Matter of)
)
Puget Sound Gillnetters) MUR 534 (78)
Association)

CONCILIATION AGREEMENT

This matter, having been internally generated, and reasonable cause to believe having been found that the respondent, Puget Sound Gillnetters Association (hereinafter PSGA), violated 2 U.S.C. §441b(a).

Now therefore, the respective parties herein, the Federal Election Commission and the respondent PSGA, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a) (5), do hereby agree as follows:

I. That the Federal Election Commission has jurisdiction over the respondent and the subject matter of this proceeding.

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

III. That the pertinent facts in this matter are as follows:

A. Respondent is an incorporated association in the Puget Sound area.

B. Respondent sponsored a group known as the Puget Sound Gillnetters Political Action Committee (PAC).

779 A 40, 10P 636 1 3 6

C. That the respondent, in January, 1977, decided to support an individual running for a seat in the U.S. Congress, whereupon its Board of Directors authorized a direct transfer of eleven hundred dollars (\$1,100) from the treasury of PSGA to the PAC.

D. That this fund transfer was made.

E. That these monies were not the proceeds of voluntary contributions received for the support of the PAC.

WHEREFORE, respondent agrees:

IV. That this fund transfer was a contribution or expenditure made in connection with a Federal election within the meaning of 2 U.S.C. §441b(b)(2)(A).

V. That this fund transfer was, accordingly, a violation of 2 U.S.C. §441b(a).

VI. That it will pay a civil penalty in the amount of one thousand dollars (\$1,000) pursuant to 2 U.S.C. §437g(a)(6)(B).
General Conditions:

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

7 9 0 4 0 1 0 0 1 3 7

II. It is mutually agreed that this agreement shall become effective as of the date that all parties have executed same and the Commission approves the entire agreement.

III. It is agreed that the respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained therein and to so notify the Commission.

79040100138

Date

William C. Oldaker
General Counsel

Puget Sound Billnetters
Association

By:

For the Respondent

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Puget Sound Gillnetters)
 Association) MUR 534
 Puget Sound Gillnetters)
 Political Action Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission do hereby certify that on September 28, the Commission determined by a vote of 4-0 to adopt the following recommendations of the General Counsel regarding the above-captioned matter as set forth in the General Counsel's Report dated September 21, 1978.

1. Found reasonable cause to believe that the Puget Sound Gillnetters Association violated 2 U.S.C. §441b(a).
2. Found reasonable cause to believe that the Puget Sound Gillnetters Political Action Committee violated 2 U.S.C. §441b(a).
3. Send the letters and conciliation agreements attached to the above-named report.

Voting for this determination were Commissioners Springer, Tiernan, Thomson and Harris.

Attest:

9/29/78
 Date

Marjorie W. Emmons
 Marjorie W. Emmons
 Secretary to the Commission

Report signed: 9-25-78
 Received in Office of Commission Secretary: 9-25-78, 4:43
 Circulated on 48 hour vote basis: 9-26-78, 4:00

79040100139

September 25, 1978

MEMORANDUM FOR: Major General

FROM: William S. Galt

SUBJECT: MCR 334

Please have the attached General Order (MCR 334) distributed to the appropriate units on a daily basis.

Thank you.

79040100140

78 SEP 25 P 4: 44

In the Matter of)
)
Puget Sound Gillnetters) MUR 534 (78)
Association)
Puget Sound Gillnetters)
Political Action Committee)

GENERAL COUNSEL'S REPORT

I. SUMMARY OF ALLEGATIONS

In the course of carrying out routine supervisory responsibilities, it was learned that eleven hundred dollars (\$1,100) in corporate funds had been directly transferred from the treasury of the Puget Sound Gillnetters Association (hereinafter PSGA) to the Puget Sound Gillnetters Political Action Committee (PAC). The secretary of PSGA noted in a telephone conversation on December 1, 1977, that this transfer was authorized by the Board of Directors of PSGA after the association had voted to support Marvin Durning for Congress. Subsequently, the PAC contributed one thousand dollars (\$1,000) of these monies to the Durning for Congress Committee. There is no evidence to indicate that the Durning Committee was aware of the corporate origin of the PAC's contributions.

The Commission, on April 19, 1978, found that there was reason to believe that PSGA violated 2 U.S.C. §441b(a) by making a corporate contribution in connection with a Federal election to the PAC. Simultaneously, the Commission found that there was reason to believe that the PAC violated 2 U.S.C. §441b(a) in its acceptance of a corporate contribution that was

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to be used in connection with a Federal election and its subsequent donation of one thousand dollars (\$1,000) to the Durning Campaign.

II. PERTINENT FACTS

The respondents were notified of the Commission's action by letters of April 24, 1978. Counsel for the respondents, by letter of May 25, 1978, requested thirty (30) days in which to contact Mr. Durning in order to seek a refund of the contribution. Counsel was given seven (7) additional days to file a report with the Commission concerning this matter. While the staff was kept apprised of Counsel's efforts to contact Durning (and at least one such contact has been made), no information was received or obtained which tended to show that no further action should be taken.

On July 28, 1978 the Commission approved the sending of subpoenas duces tecum and interrogatories to the treasurer of the PAC and the President of PSGA. A response to the inquiries was received on August 25, 1978. The documents obtained show that the PSGA Board of Directors voted to support Marvin Durning at a meeting held in January of 1977. (see exhibit 1) At a meeting of March 17, 1977, the Board discussed a proposal to send Durning \$500 now and another \$500 "if he should enter the Congressional race." (see exhibit 2). The Durning Committee reports note a receipt of \$500 from PSGA on March 18, 1977 (see exhibit 3).

The Durning Committee reports show that this \$500 contribution was returned to PSGA on April 15, 1977 (see exhibit 4).

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This check was deposited in the PAC's checking account. The PSGA minutes for the Board meeting of April 21, 1977 note that the returned check was "discussed" and that the Board was informed that "a new account called the Puget Sound Gillnetters Association Political Action Committee has been opened in order to disperse political funds to future candidates" (see exhibit 5). The PAC contributed \$1000 to the Durning Campaign by check, dated April 21, 1977. (see exhibit 6). Its receipt was noted in the Durning reports on April 29, 1977 (see exhibit 7).

III. ANALYSIS

Section 441b(a) of Title 2 of the U.S. Code states that it is unlawful for any corporation to make a contribution or expenditure in connection with any election to any political office. A telephone conversation with a PAC employee on December 1, 1977, regarding a request for additional information, revealed that the PSGA directly transferred funds from its treasury to that of its PAC in early 1977 (see exhibit 8). This was to further the PSGA's decision to support a particular congressional candidate. As the source of the PAC funds was the sponsoring incorporated association and the fund transfer was made upon a conscious decision to support a particular Federal candidate, a clear violation of 2 U.S.C. §441b(a) has occurred.

Reports filed with the Commission indicate that the PAC received eleven hundred dollars (\$1,100) in the period between January 1 and April 21, 1977, and that one thousand dollars (\$1,000) of this amount was contributed to the Durning for Congress Campaign. (see exhibit 9). As it is doubtful that the

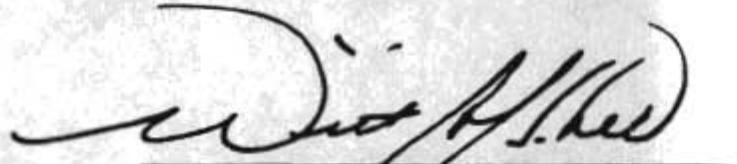
79040100144

PAC was unaware that this money was contributed by its parent, the transaction amounts to the knowing acceptance (by the PAC) of a corporate contribution prohibited by §441b(a). This, and the one thousand dollar (\$1,000) donation are violations of this section.

IV. RECOMMENDATIONS

1. Find reasonable cause to believe that the Puget Sound Gillnetters Association violated 2 U.S.C. §441b(a).
2. Find reasonable cause to believe that the Puget Sound Gillnetters Political Action Committee violated 2 U.S.C. §441b(a).
3. Approve attached letters and conciliation agreements.

9/26/78
Date



William C. Oldaker
General Counsel

ATTACHMENTS

1. Minutes
2. Minutes
3. Durning Committee Reports
4. Durning Committee Reports
5. Minutes
6. Copy of Check
7. Durning Committee Reports
8. Memorandum
9. PAC reports
10. Conciliation Agreements (2)
11. Letters to Respondents (2)

70040100145

Schedule A

July 1976
 Federal Election Commission
 1325 N. Street, N.W.
 Washington, D.C. 20542

**Itemized Receipts,
 Contributions, Ticket Purchases, Loans,
 Rebates, and Transfers for Line
 Numbers 15, 16, 17 and/or 18 of FEC Form 3**
See instructions on back!

Page _____ of _____ for
 LINE NUMBER 15A
(This schedule shall be filed with the
 numbered line)

Name of Candidate or Committee in Full

DURNING FOR CITIZENS 068748

Full Name, mailing address and ZIP code
**Rodis Benediktson,
 4609 41st Ave. N
 Seattle, WA 98105**

Date (month,
 day, year)

Amount of each
 receipt this period

Principal place of business

Occupation
retired

Check if Contributor is self-employed

Aggregate Year-to-date **\$ 50.00** **3/18/77** **50.00**

Full Name, mailing address and ZIP code
**Alice Franklin Bryant
 2013 Broadway E
 Seattle**

Date (month,
 day, year)

Amount of each
 receipt this period

Principal place of business

Occupation
retired

Check if Contributor is self-employed

Aggregate Year-to-date **\$ 200.00** **3/18/77** **100.00**

Full Name, mailing address and ZIP code
**Janis K. Collins
 400 35th Ave
 Seattle, WA 98122**

Date (month,
 day, year)

Amount of each
 receipt this period

Principal place of business

Occupation
speech therapist

Check if Contributor is self-employed

Aggregate Year-to-date **\$ 50.00** **3/18/77** **50.00**

Full Name, mailing address and ZIP code
**Jeff Galtz
 Pt 7 Box 644
 Olympia, WA 98506**

Date (month,
 day, year)

Amount of each
 receipt this period

Principal place of business

Occupation
at home

Check if Contributor is self-employed

Aggregate Year-to-date **\$ 50.00** **3/18/77** **20.00**

Full Name, mailing address and ZIP code
**Don Ferezinin
 2407 A Court Melody Lane
 Duwamish, WA 98022**

Date (month,
 day, year)

Amount of each
 receipt this period

Principal place of business

Occupation
restaurant owner

Check if Contributor is self-employed

Aggregate Year-to-date **\$ 50.00** **3/18/77** **50.00**

Full Name, mailing address and ZIP code
**Fugot Sound Gillnetters Association
 Fishermen's Terminal Bldg. C-3 Room 103
 Seattle, WA 98119**

Date (month,
 day, year)

Amount of each
 receipt this period

Principal place of business

Occupation

Check if Contributor is self-employed

Aggregate Year-to-date **\$ 500.00** **3/18/77** **500.00**

Subtotal of receipts (the page foot-note) **\$ 780.00**

79010100146
 77011211844

Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 700

LINE NUMBER 325

(Use separate schedules for each multiple line)

(See instructions on back)

7 9 0 470710010112473709

Name of Candidate or Committee in full			
Durning for Congress C00075523			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Puget Sound Gilnetters Association Fisherman's Terminal Bldg C-3 Room 103 Seattle, WA 98119	refund of contribution	4/15/77 \$375	500.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
11th District Democrats c/o Bruce McKay, Chairperson 241 Factory N Renton, WA 98055	refund of contribution	4/18/77 \$330	750.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Subtotal of expenditures this page (optional)			\$1250.00
Total this period (list page this line number only)			\$

Wagot Sound Gilchrist
Association
Action Committee

April 21, 1977

PAY TO THE ORDER OF Dumung for Congress

\$1000.00

ONE THOUSAND AND NO/100'S

DOLLARS

RAINIER BANK

Seattle Pacific Office 3000 1st Ave. Seattle, WA 98119

RAINIER NATIONAL BANK

for 7th Congressional Dist.

Philip J. Sullivan
John P. [Signature]

⑆1250⑉0683⑆ ⑆1091126852⑆

79040100148

Transfers for Line
 Numbers 15, 16, 17 and/or 18 of FEC Form 3
 (see instructions on back)

(Use amounts scheduled for each numbered line).

Name of Candidate or Committee in full		Date (month, day, year)	Amount of each receipt this period
DUNTING FOR CONGRESS C00075523 Deposit of 4/25/77			
Full Name, mailing address and ZIP code	Occupation	Date (month, day, year)	Amount of each receipt this period
Canners Public Affairs Committee (Leg. Affairs Div of Nat'l Canners) 15215 Rockport Drive, Silver Spring, Maryland 20904	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-Date ▶ \$ 100.00	4/25/77	100.00
Principal place of business	Occupation	Date (month, day, year)	Amount of each receipt this period
	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-Date ▶ \$	4/25/77	1,000.00
Full Name, mailing address and ZIP code	Occupation	Date (month, day, year)	Amount of each receipt this period
Pudget Sound Gillnetters Assoc. Political Action Committee Fisherman's Terminal Bldg., C-3, Room 105, Seattle, 98119	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-Date ▶ \$	4/25/77	1,000.00
Principal place of business	Occupation	Date (month, day, year)	Amount of each receipt this period
	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-Date ▶ \$		
Full Name, mailing address and ZIP code	Occupation	Date (month, day, year)	Amount of each receipt this period
	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-Date ▶ \$		
Principal place of business	Occupation	Date (month, day, year)	Amount of each receipt this period
	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-Date ▶ \$		
Full Name, mailing address and ZIP code	Occupation	Date (month, day, year)	Amount of each receipt this period
	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-Date ▶ \$		
Principal place of business	Occupation	Date (month, day, year)	Amount of each receipt this period
	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-Date ▶ \$		
Full Name, mailing address and ZIP code	Occupation	Date (month, day, year)	Amount of each receipt this period
	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-Date ▶ \$		
Principal place of business	Occupation	Date (month, day, year)	Amount of each receipt this period
	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-Date ▶ \$		
Subtotal of receipts this page (optional)			\$ 1,100.00
Total this period (last page this line number only)			\$

77011223663



FEDERAL ELECTION COMMISSION

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

February 10, 1978

MEMORANDUM FOR: Bill Oldaker

THROUGH: Orlando B. Potter *O.B.P.*
Lois Zella
Steve Mins *SM*

FROM: Ron Ewalt *RE*

SUBJECT: Puget Sound Gillnetters Political Action Committee

This committee is being submitted for possible MUR designation for the following reasons:

1. In a telephone conversation on 12/1/77 with the committee regarding a Request for Additional Information sent to the committee asking for the source of funds for the cash-on-hand balance for the beginning of its first report (October 10 Quarterly 1977), it was revealed that the association (Puget Sound Gillnetters Association) had transferred the \$1100 from the association treasury to the PAC treasury. The association is incorporated under Washington state law, according to the committee. In conversations with the secretary and with the chairman of the committee, Philip G. Sutherland, it was confirmed that the association had decided in a membership meeting in February 1977 to support Marvin Durning for Congress; the Board of Directors had authorized the transfer of the \$1100 from the association treasury to the PAC and had transferred \$1000 to the candidate. The funds from the association were not voluntary contributions received for the support of the PAC.

2. The committee was informed that the transfer appears to be a corporate contribution and that the candidate has received a possible corporate contribution, both prohibited by the FDCA. It was suggested to the committee that it ask for a return of the contribution from Durning and then return that amount to the association, subsequently soliciting contributions from the membership if the committee still wishes to support Durning.

3. Review of Durning's reports disclose a \$500 contribution from the Puget Sound Gillnetters on 3/15/77, which was returned on 4/15/77, and



continued

PUGET SOUND GILNETTERS POLITICAL ACTION COMMITTEE
PAGE 2

the \$1000 contribution on 4/25/77 as reported by the candidate. Durning for Congress committee shows a \$0 cash-on-hand balance on the latest report, the October 10 Quarterly.

These events raise the following questions:

1. The committee has received and transferred to a federal candidate possible corporate contributions.
2. The committee wishes to terminate reporting with the FEC.
3. The Durning for Congress committee according to its latest report may not be able to return the contribution.

79040100151

Report of Receipts and Expenditures
 of a Candidate or Committee
 Supporting any Candidate(s) for
 Nomination or Election to Federal Office

Amended Report
 w/ Schedule B

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Candidate or Committee (in full) <input type="checkbox"/> Check if name or address is changed Puget Sound Gillnetters Association Political Action Comm		2 Identification Number 91-0920502
(b) Address (number and street) Fishermen's Terminal, Bldg. C-3, Room 103		3(a) Is this a report of receipts and expenditures for only one election? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(c) City, State and ZIP code Seattle, Washington 98119		(b) If "Yes," for which election? Congress runoff on 4/21/77 (general, primary, runoff) (date)
4 Type of Report (Check appropriate box and complete, if applicable) (a) <input type="checkbox"/> Amendment For _____ (Which report) (b) <input type="checkbox"/> April 10 Quarterly Report (c) <input type="checkbox"/> July 10 Quarterly Report (d) <input checked="" type="checkbox"/> October 10 Quarterly Report		(e) <input type="checkbox"/> January 31 Year End Report (f) <input type="checkbox"/> Monthly Report _____ (Month) (g) <input type="checkbox"/> Termination Report
(h) <input type="checkbox"/> Tenth day report preceding Congress-primary election on 4/21/77 (primary, general or convention) (date)		In the State of Washington
(i) <input type="checkbox"/> Thirtieth day report following _____ election on _____ (primary, general or convention) (date)		In the State of _____

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From **April 1, 1977** Through **September 30, 1977**

Section A - Cash Balance Summary	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19 77	00	\$
7 Cash on hand at beginning of reporting period	\$ 1100.00	\$ 1100.00
8 Total receipts (from line 19)	\$	\$
(a) Subtotal (Add lines 7 and 8)	\$	\$
9 Total expenditures (From line 25)	\$ 1000.00	\$ 1000.00
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 100.00	\$ 100.00
11 Contributed items on hand to be liquidated (attach itemized list)	\$	\$
Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)		
12 Operating expenditures (from line 20)	\$ 1000.00	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation	\$	\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)	\$	\$

I certify that I have examined this Report, and to the best of my knowledge and belief it is true, correct and complete.
Philip G. Sutherland (Typed Name of Treasurer or Candidate) *Philip G. Sutherland* (Signature of Treasurer or Candidate) **11-1-77** (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 or §441 (See reverse side of form)

Detailed Summary Schedule of Receipts and Expenditures
 (Page 2)

Name of Candidate or Committee	REPORT COVERING THE PERIOD	
	FROM:	TO:
	Column A This Period	Column B Calendar year-to-date
PART I - RECEIPTS		
15 Contributions and other income:		
(a) Itemized (use Schedule A)	\$	\$
(b) Unitemized	\$	\$
(c) Sales and Collections Included Above:		
List by event on memo Schedule D (\$		
(d) Subtotal of contributions and other income	\$	\$
16 Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	\$	\$
(b) Unitemized	\$	\$
(c) Subtotal of loans and loan repayments received	\$	\$
17 Refunds, Rebates, Returns Received:		
(a) Itemized (use Schedule A)	\$	\$
(b) Unitemized	\$	\$
(c) Subtotal of refunds, rebates, returns	\$	\$
18 Transfers In:		
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)	\$	\$
(b) From other Committees (Itemize on Schedule A Regardless of Amount)	\$	\$
(c) Subtotal of transfers in	\$	\$
19 Total Receipts	\$	\$
PART II - EXPENDITURES		
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):		
(a) Itemized (use Schedule B)	\$	\$
(b) Unitemized	\$	\$
(c) Subtotal of operating expenditures	\$	\$
21 Independent Expenditures (use Schedule E)	\$	\$
22 Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	\$	\$
(b) Unitemized	\$	\$
(c) Subtotal of loans and loan repayments made and contribution refunds	\$	\$
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures:		
(a) Itemized (use Schedule B)	\$	\$
(b) Unitemized	\$	\$
(c) Subtotal of fundraising expenditures	\$	\$
24 Transfers Out:		
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)	\$	\$
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)	\$ 1,000.00	\$
(c) Subtotal of transfers out	\$	\$
25 Total Expenditures	\$	\$
PART III - DEBTS AND OBLIGATIONS		
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)	\$	\$
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)	\$	\$
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
28 Total Receipts (from line 19)	\$	\$
29 Transfers In (from line 18(a))	\$	\$
30 Net Receipts (Subtract line 29 from line 28)	\$	\$
31 Total Expenditures (from line 25)	\$	\$
32 Transfers out (from line 24(a))	\$	\$
33 Net Expenditures (Subtract line 32 from line 31)	\$	\$

Schedule B
1976
Federal Election Commission
1100 L Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3
(see instructions on back)

Page _____ of _____ for
LIVE NUMBER 24 (b)
Use separate schedule(s) for each numbered line!

Name of Candidate or Committee in full
Puget Sound Political Action Committee

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Marvin B. Durning, Attorney 1411 - 4th Avenue Seattle, Washington 98104 75523	Support for Candidate for Congress District #7	4/1/77- 9/30/77	\$1000.00

Subtotal of expenditures this page (optional) ▶ \$ 1000.00
Total this period (last page this line number only) ▶ \$ 1000.00



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ben Cain, Treasurer
Puget Sound Gillnetters Political
Action Committee
Fishermen's Terminal, C-3, Room 103
Seattle, Washington 98119

Re: MUR 534(78)

Dear Mr. Cain:

On October , 1978, the Commission determined there was reasonable cause to believe that your committee committed a violation of 2 U.S.C. 441b(a) of the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission found reasonable cause to believe that the acceptance of \$1,100 of general treasury funds from the Puget Sound Gillnetters Association and your committee's donation of \$1,000 of this money to the campaign of Marvin Durning violated the prohibitions of 2 U.S.C. 441b (a).

The Commission has a duty to attempt to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. 2 U.S.C. §437g(a)(5)(B). If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit in United States District Court and seek payment of a civil penalty not in excess of \$5,000.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission approve the agreement.

79040100155

- 2 -
If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Gary D. Lipkin, the attorney assigned to this matter, at 202-523-4529.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

1. Conciliation Agreement

79040100156



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Philip G. Sutherland, President
Puget Sound Gillnetters Association
Fishermen's Terminal, C-3
Seattle, Washington 98119

Re: MUR 534(78)

Dear Mr. Sutherland:

On October , 1978, the Commission determined there was reasonable cause to believe that your association committed a violation of 2 U.S.C. §441b(a) of the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission found reasonable cause to believe that the direct transfer of \$1,100 from the association's treasury to the Puget Sound Gillnetters Political Action Committee violated the provisions of 2 U.S.C. §441b(a).

The Commission has a duty to attempt to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. 2 U.S.C. §437g(a)(5)(B). If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit in United States District Court and seek payment of a civil penalty not in excess of \$5000.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission approve the agreement.

79040100157

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Gary D. Lipkin, the attorney assigned to this matter, at 202-523-4529.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

1. Conciliation Agreement

79040100158



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE
FROM: MARJORIE W. ENWES
DATE: AUGUST 29, 1978
SUBJECT: MUR 534 INTERIM STATUS REPORT
 Received in Office of Commission
 Secretary: 8-28-78, 10:27

The above-named document was circulated on a 24
hour no-objection basis at 3:00 p.m. on August 28, 1978.

The Commission Secretary's Office has received
no objections to the Interim Status Report.

79040100159

August 22, 1974

MEMORANDUM TO: Margo Wilson
FROM: Edward T. Carr
SUBJECT: MUR 534

Please have the attached Internal Affairs Report on
MUR 534 distributed to the Commission.

Thank you.

79040100160

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Puget Sound Gillnetters Association)
Puget Sound Gillnetters Political)
Action Committee) MUR 534 (78)

Interim Status Report

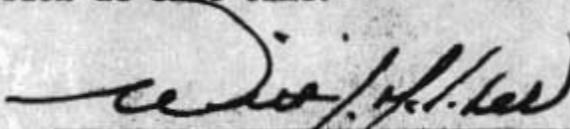
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The final report of the Puget Sound Gillnetters PAC (PSGPAC) revealed an apparent transfer of eleven hundred dollars (\$1,100) from the Puget Sound Gillnetters Association (PSGA) treasury to that of PSGPAC. This corporate fund transfer appears to have been authorized by PSGA after it decided to support Marvin Durning for Congress. PSGPAC then contributed one thousand dollars (\$1,000) to the Durning For Congress Committee. As this transfer and contribution may be in violation of 2 U.S.C. § 441b(a), reason to believe was found against the respondents on April 19, 1978

On July 26, 1978, the Commission approved the issuance of subpoenas and interrogatories to the respondents. We expect to receive a response to these inquiries shortly and will make a fuller report to the Commission at that time.

Date

8/25/78


William C. Oldaker
General Counsel

205690
GCC# 4646

RECEIVED
FEDERAL ELECTION
COMMISSION

LAW OFFICES
MORIARTY, LONG, MIKKELBORG & BROZ

3300 SEATTLE-FIRST NATIONAL BANK BUILDING
SEATTLE, WASHINGTON 98154
(206) 623-8890

CHARLES P. MORIARTY, JR.
JEREMIAH M. LONG
JACOB A. MIKKELBORG
RICHARD F. BROZ
ROBERT G. WELLS, JR.
DOUGLAS M. FRYER
R. THOMAS OLSON
ROBERT J. WALERIUS

CHARLES E. YATES
DOUGLAS M. DUNCAN
RAMONA A. URANO
ALEXANDER W. WOOD
ALEC W. BRINDLE
PARTNER ON LEAVE

'78 AUG 25 11 30 AM

August 23, 1978

7 2 9 1 0 0 1 6 2

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

Re: MUR 534 (78)

Dear Mr. Lipkin:

Pursuant to your subpoena duces tecum I enclose the following items:

1. Cancelled checks reflecting contributions from Puget Sound Gillnetters Association to the Durning for Congress campaign;
2. Copies of the Minutes of Board Meetings of the Puget Sound Gillnetters Association wherein authorization was granted for contributions to the Durning for Congress campaign;
3. Our billing for the cost of copying documents.

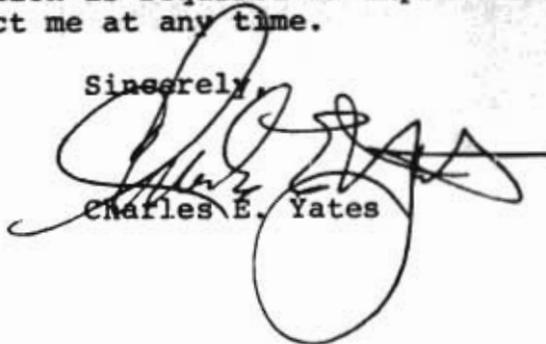
You will note that we have no check reflecting the initial deposit of \$1,000.00 in the Puget Sound Gillnetters Association political action committee. The association, as the notes reflect, originally made two contributions of \$500.00 directly from their treasury to the Durning for Congress campaign. Upon notification from the Federal Election Commission that such contributions were improper, a \$1,000.00 refund was made to PSGA by Mr. Durning and this check was deposited in the political action committee account. This check would be available only from the Durning for Congress committee.

Mr. Gary D. Lipkin
August 23, 1978
Page Two

Included in the Minutes which you are receiving is information pertaining to the Association's dealing with other governmental agencies. The utilization of these minutes for any purpose other than an examination of the Association's participation in federal elections is prohibited. Public disclosure or the providing of any other Federal agency of these minutes is also prohibited.

If any additional information is required or explanation, please feel free to contact me at any time.

Sincerely,



Charles E. Yates

CEY/cjj
Enc.
cc: PSGA

7 2 0 4 0 1 0 0 1 6 3

LAW OFFICES
MORIARTY, LONG, MIKKELBORG & BROZ
3300 SEATTLE-FIRST NATIONAL BANK BUILDING
SEATTLE, WASHINGTON 98104
(206) 623-8890

August 23, 1978

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

I. D. NO. 91-0882366

Re: MUR 534 (78)
Subpoena Duces Tecum

Xeroxing charge for 13 copies at \$.25 per copy \$ 3.25

70040100157

CEY/cjj
cc: PSGA

PUGET SOUND GILNETTERS
 POLITICAL ACTION COMMITTEE
 FISHERMAN'S TERMINAL
 BLDG. C-3 ROOM 103 284-8520
 SEATTLE, WASHINGTON 98119

1 0 1 0 0 6 181
 Feb 17 1978 19-683/1250

PAY TO THE ORDER OF Puget Sound Gillnetters Assoc. \$85⁷³
Eighty Five and 73/100 DOLLARS

RAINIER BANK
 Seattle Pacific Office, Seattle, WA 98119
 RAINIER NATIONAL BANK

FOR DEPOSIT TO THE ORDER OF: Philip Sutherland
 ⑆ 250 ⑆ 0683 ⑆ 1091424852 ⑆ PS ⑆ 170000008593 ⑆

Puget Sound Gillnetters
 Association Political
 Action Committee 19-683/1250
 April 21, 1977

PAY TO THE ORDER OF Durning for Congress \$1000.00
 ONE THOUSAND AND NO/100'S DOLLARS

RAINIER BANK
 Seattle Pacific Office, Seattle, WA 98119
 RAINIER NATIONAL BANK

FOR 7th Congressional Dist. Philip Sutherland
 ⑆ 250 ⑆ 0683 ⑆ 1091424852 ⑆ PS ⑆ 170000008593 ⑆

PUGET SOUND
 GILNETTERS ASSOCIATION 769
 FISHERMAN'S TERMINAL
 BLDG. C-3 ROOM 103 284-8520
 SEATTLE, WASHINGTON 98119 19-683/1250

PAY TO THE ORDER OF Durning for Congress \$500
FSGA ⑆ ⑆ ⑆ 500 00 00 CTS DOLLARS

RAINIER BANK
 Seattle Pacific Office, Seattle, WA 98119
 RAINIER NATIONAL BANK

PUGET SOUND GILNETTERS ASSOCIATION
 BY Philip Sutherland
John P. Sutherland

⑆ 00000769 ⑆ ⑆ 250 ⑆ 0683 ⑆ 1091424712 ⑆ ⑆ 0000050000 ⑆

PUGET SOUND
 GILNETTERS ASSOCIATION 800
 FISHERMAN'S TERMINAL
 BLDG. C-3 ROOM 103 284-8520
 SEATTLE, WASHINGTON 98119 19-683/1250

PAY TO THE ORDER OF Durning for Congress \$500
FSGA ⑆ ⑆ ⑆ 500 00 00 CTS DOLLARS

RAINIER BANK
 Seattle Pacific Office, Seattle, WA 98119
 RAINIER NATIONAL BANK

PUGET SOUND GILNETTERS ASSOCIATION
 BY Philip Sutherland
John P. Sutherland

⑆ 00000800 ⑆ ⑆ 250 ⑆ 0683 ⑆ 1091424712 ⑆ ⑆ 0000050000 ⑆

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FB '75' 17 Paid
RAINIER NAT'L BANK
SEATTLE WASH
PAY ANY BANK

BANK
SEATTLE WASH
P.E.G.
19-3

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RAINIER NAT'L BANK
SEATTLE WASH
P.E.G.
19-3

APR 25 77

AP '77' 25 Paid
RAINIER NAT'L BANK
SEATTLE, WASH.
PAY ANY BANK

PAY TO THE ORDER OF
RAINIER NAT'L BANK
SEATTLE WASHINGTON
P.E.G.
19-3

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RAINIER NAT'L BANK
SEATTLE WASH
P.E.G.
19-3

MAR 18 77

MR '77' 18 Paid
RAINIER NAT'L BANK
SEATTLE, WASH.
PAY ANY BANK

NATIONAL BANK
SEATTLE WASH
P.E.G.
19-3

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APR 20 77

APR '77' 20 Paid
RAINIER NAT'L BANK
SEATTLE, WASH.
PAY ANY BANK

NATIONAL BANK
SEATTLE WASH
P.E.G.
19-3

0 1 0 9 6 4 3 0 2

FEDERAL ELECTION
COMMISSION

1 0 0 1 6 7

78 AUG 25 AM 11:50



FIRST CLASS

FROM
MORIARTY, LONG, MIKKELBORG & BROZ
ATTORNEYS AT LAW
3300 SEATTLE-FIRST NATIONAL BANK BUILDING
SEATTLE, WASHINGTON 98154

TO:
Mr. Gary D. Lipkin
Office of General Counsel
Federal Election Commission
1325 K Street N.W.
WASHINGTON DC 20463

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 534 (78)

Subpoena Duces Tecum to Produce Certain Documents

To: Mr. Ben Cain, Treasurer
Puget Sound Gillnetters Political Action Committee
Fisherman's Terminal, C-3, Room 103
Seattle, Washington 98119

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. §437d(a)(3), Ben Cain, the Treasurer of the Puget Sound Gillnetters Political Action Committee (hereinafter PAC), is hereby ordered to produce the following documents, records or memoranda for inspection and/or copying.;

1. the checks or other instruments of payment received from the Puget Sound Gillnetters Association for the support of candidates for federal office;
2. the deposit slips or receipts therefor, evidencing the depositing of these monies in the checking and/or savings account of the PAC;
3. any letter, document, or memoranda authorizing the PAC to contribute to the Campaign of Marvin Durning for Congress
4. the checks or other instruments of payment used to make any contribution to the campaign of Marvin Durning for Congress; and
5. any letter or other document which would evidence

receipt of these monies by the campaign of Marvin Durning for Congress.

The aforementioned items should be made available for copying and inspection at the offices of the PAC or its attorneys or at the offices of the Federal Election Commission, 1325 K Street, N.W., Washington, D.C., within ten (10) days of the receipt of this subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set her hand at Washington, D.C., on this *28th* day of *July*, 1978.



Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 534 (78)

Interrogatories to Respondent

To: Mr. Ben Cain, Treasurer
Puget Sound Gillnetters Political Action Committee
Fishermen's Terminal, C-3, Room 103
Seattle, Washington 98119

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. §437d(a)(3), Ben Cain, the Treasurer of the Puget Sound Gillnetters Political Action Committee, is hereby ordered to answer, under oath, the following interrogatories within ten (10) days of receipt:

1. State the names of the officers and members of the Board of Directors of the Puget Sound Gillnetters Political Action Committee (hereinafter PAC) during 1977.
2. State the date on which the PAC decided to contribute to, or received authorization to contribute to, the Marvin Durning for Congress campaign.
3. State the date on which the PAC contributed to the campaign of Marvin Durning for Congress.
4. State the date on which the PAC received the funds which enabled it to contribute to the campaign of Marvin Durning for Congress.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set her hand at Washington, D.C., on this ~~28th~~ day of *July* 1978.

Joan D. Aikens

Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

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

July 21, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Philip G. Sutherland, President
Puget Sound Gillnetters Association
Fishermen's Terminal, C-3
Seattle, Washington 98119

Re: MUR 534 (78)

Dear Mr. Sutherland,

Pursuant to the Commission's finding of April 4, 1978 that there is reason to believe that your organization violated 2 U.S.C. § 441b(a), the Commission has issued the enclosed subpoena duces tecum and request for interrogatories. Your response to these inquiries within ten (10) days of receipt will be appreciated.

If you have any questions, please feel free to call Gary D. Lipkin, the attorney assigned to this matter, at (202) 523-4529.

Sincerely yours,

William C. Eldaker
General Counsel

enclosures



PS Form 3811, Apr. 1977

1. The following service is requested (check one):
 Show to whom and date delivered.
 Show to whom, date, and address of delivery.
 RESTRICTED DELIVERY
 Show to whom and date delivered.
 RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery. (CONSULT POSTMASTER FOR FEES)

2. ARTICLE DESCRIPTION:
 Philip G. Sutherland for
 Puget Sound Gillnetters Assoc.
 Fishermen's Terminal, C-3
 Seattle, WA 98119

3. ARTICLE NO. 90950 REGISTERED NO. 90950 INSURED NO.

4. I have received the article described above.
 Signature: *Philip G. Sutherland* AUTHORIZED AGENT
 DATE OF DELIVERY: 8/3/78 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

7. CLERK'S INITIALS

8. (202) 523-4529

MUR 534
G. Lipkin

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 534 (78)

Subpoena Duces Tecum to Produce Certain Documents

To: Mr. Philip G. Sutherland, President
Puget Sound Gillnetters Association
Fisherman's Terminal, C-3
Seattle, Washington 98119

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. §437d(a)(3), Philip Sutherland, the President of the Puget Sound Gillnetters Association (hereinafter PSGA), is hereby ordered to produce the following documents, records, or memoranda for inspection and/or copying:

1. a copy of the minutes of the meeting at which the PSGA membership voted to support Marvin Durning for Congress;
2. a copy of the resolution or authorization of the Board of Directors of PSGA authorizing the transfer of eleven hundred dollars (\$1,100) from the treasury of PSGA to the Puget Sound Gillnetters Political Action Committee (hereinafter PAC); and
3. the check or other instrument of payment used to effect this fund transfer.

The aforementioned items should be made available for copying and inspection at the offices of PSGA or its attorneys or at the offices of the Federal Election Commission, 1325 K Street, N.W., Washington, D.C., within ten (10) days of the receipt of this subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set her hand at Washington, D.C., on this *20th* day of *July* 1978.


Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Re: MUR 534 (78)

Interrogatories to Respondent

To: Mr. Philip G. Sutherland, President
Puget Sound Gillnetters Association
Fishermen's Terminal, C-3
Seattle, Washington 98119

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. §437d(a)(3), Philip G. Sutherland, the President of the Puget Sound Gillnetters Association (hereinafter PSGA), is hereby ordered to answer, under oath, the following interrogatories within ten (10) days of receipt:

1. state the names of the officers and members of the Board of Directors of the PSGA during 1977;
2. state the date on which the membership of PSGA voted to support Marvin Durning for Congress;
3. state the date on which the Board of Directors of PSGA voted to authorize a transfer of eleven hundred dollars (\$1,100) from the PSGA treasury to the Puget Sound Gillnetters Political Action Committee (hereinafter PAC); and
4. state the date on which the check or other instrument of payment which effected this fund transfer was made.

Interrogatories to
Sutherland

- 2 -

MUR 534

WHEREFORE, the Chairman of the Federal Election
Commission has hereunto set her hand at Washington, D.C.,
on this 28th day of July 1978.

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EDMONS *MWE*
SUBJECT: ISSUANCE OF SUBPOENAS IN RELATION TO
MUR 534
DATE: July 28, 1978

The attached subpoenas, approved July 26, 1978,
have been signed and sealed this date.

79040100178



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Puget Sound Gillnetters) MUR 534 (78)
Association)
Puget Sound Gillnetters Political)
Action Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on July 26, 1978, the Commission determined by a vote of 5-0 to issue subpoenas and interrogatories to the individuals named below as recommended in the General Counsel's Memorandum dated July 21, 1978:

Philip G. Sutherland, President
Puget Sound Gillnetters Association

Ben Cain, Treasurer
Puget Sound Gillnetters Political
Action Committee

Commissioner Thomson was not present at the time of the vote.

Date: 7/26/78

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

79040100179

JULY 24, 1954

MEMORANDUM TO: Margo Brown
FROM: Elise G. Galt
SUBJECT: MUR 534

Please have the attached memo to Commission and
request for subpoenas distributed on a 48 hour tally basis.
Thank you.

79040100180



FEDERAL ELECTION COMMISSION

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

Memorandum To: The Commission
From: William C. Gldaker *W.C. Gldaker*
Date: July 21, 1978
Re: Issuance of Subpoenas in MUR 334 (78)

Pursuant to the Commission's finding of April 14, 1978, that there was reason to believe that the respondents in the above captioned MUR violated 2 U.S.C. § 441b(a), the staff wishes to examine certain documents and have several questions asked of the respondents. Accordingly we recommend that the attached subpoenas duces tecum and interrogatories be issued to the individuals named below:

Philip G. Sutherland, President
Puget Sound Gillnetters Association

Ben Cain, Treasurer
Puget Sound Gillnetters Political Action Committee

79040100181





FEDERAL ELECTION COMMISSION

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

Authorization to Issue Subpoenas in MUR 534 (78)

The Commission hereby authorizes the issuance of subpoenas duces tecum and interrogatories to Philip G. Sutherland, President, Puget Sound Gillnetters Association and to Ben Cain, Treasurer, Puget Sound Gillnetters Political Action Committee.

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Joan Aikens, Chairman

Robert O. Tiernan, Vice Chairman

Thomas E. Harris, Commissioner

Vernon W. Thompson, Commissioner

Neil Staebler
Commissioner

William L. Springer
Commissioner



FEDERAL ELECTION COMMISSION

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

June 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles E. Yates
Moriarty, Long, Mikkelsen and Broz
3300 Seattle - First National Bank Bldg.
Seattle, Washington 98154

Re: MUR 534

Dear Mr. Yates:

In reference to your letter of May 23, 1978, please be advised that the Federal Election Commission has not changed its position on the validity of 2 U.S.C. 441(b) as a result of the decision in First National Bank of Boston v. Bellotti, 46 Law Week 4371. Enforcement of all the provisions of the Federal Election Campaign Act will continue as before.

Sincerely yours,

William C. Oldaker
General Counsel

FORM 3825, APR 1977

1. The following service is requested (check one)
 Show to whom and date delivered
 Show to whom, date, and address of delivery
 RESTRICTED DELIVERY
 Show to whom and date delivered
 RESTRICTED DELIVERY
 Show to whom, date, and address of delivery & (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: Charles Yates
3300 Seattle - 1st Flate
Seattle, Wash. 98154

3. ARTICLE DESCRIPTION:
 REGISTERED NO. 496657 CERTIFIED NO. INSURED NO.

4. I have received the article described above.
 Addressee Authorized agent
 (Change address or signature of addressee or agent)

5. ADDRESS Complete only if recipient is different from addressee
 DATE OF DELIVERY JUN 11 1978
 TIME 11:00 AM
 ADDRESS: 3300 Seattle - 1st Flate
 Seattle, WA 98154

6. UNABLE TO DELIVER BECAUSE:

7. SENDER'S INITIALS

8. POSTMAN'S INITIALS

9. POST OFFICE

10. ZIP CODE

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13. COUNTRY

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FEDERAL ELECTION COMMISSION

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

June 2, 1978

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
SUBJECT: MUR 534 - Interim Status Report dated 5-31-78
Received in Office of Commission
Secretary: 6-1-78, 11:54

The above-mentioned document was circulated on a 24
hour no-objection basis at 3:00 p.m., June 1, 1978.

There were no objections to the Interim Status Report.

79040100184

June 1, 1978

MEMORANDUM TO: Burge
FROM: Wilson
SUBJECT: MR 534

Please have the attached Bureau Status Report on
MR 534 distributed to the Commission.

Thank you.

79040100185

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Puget Sound Gillnetters Association }
Puget Sound Gillnetters Political } MUR 534 (78)
Action Committee }

INTERIM STATUS REPORT

70040100185

The final report of the Puget Sound Gillnetters PAC (PSG), revealed an apparent transfer of eleven hundred dollars (\$1,100.00) from the Puget Sound Gillnetters Association, Inc. (PSGA) treasury to that of the PSG. This corporate fund transfer appears to have been authorized by the PSGA after it decided to support Marvin Durning for Congress. PSG then contributed one thousand dollars (\$1,000) to the Durning For Congress Committee. As this transfer and contribution may be in violation of 2 U.S.C. 441b(a), reason to believe was found against the respondents on April 19, 1978.

Counsel for the respondents requested, by letter of May 5, 1978, an additional 30 days in which to contact Mr. Durning (who no longer lives in Washington and whose political committee is no longer active) to request a refund of the contribution. Counsel offered to keep the Commission advised of his progress by forwarding us copies of all correspondence with Mr. Durning.

The staff advised the respondents' counsel, by letter of May 18, 1978 that while a 30 day extension could not be granted, the Commission would grant an additional period of one week from the date of his receipt of this letter. We expect to receive further information shortly and will make a full report to the Commission at that time.

5/31/78
Date

William C. Oldaker
William C. Oldaker
General Counsel

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2003668

LAW OFFICES
MORIARTY, LONG, MIKELBORG & ASSOCIATES
FEDERAL ELECTION COMMISSION

CHARLES P. MORIARTY, JR.
JEREMIAH M. LONG
JACOB A. MIKELBORG
RICHARD F. BROZ
ROBERT O. WELLS, JR.
DOUGLAS M. FRYER
R. THOMAS OLSON
ROBERT J. WALERIUS

3300 SEATTLE-FIRST NATIONAL BANK BUILDING
SEATTLE, WASHINGTON 98104
(206) 423-8888

CHARLES E. YATES
DOUGLAS M. DUNCAN
PAMELA A. DIERO
ASSISTANT SECRETARY
RASC H. BRINDLE
PARTNER ON LEAVE

78 MAY 27 PM 11:49

May 23, 1978

803105

Mr. Gary E. Lipkin
Federal Election Commission
1325 K Street N.W.
Washington, DC 20463

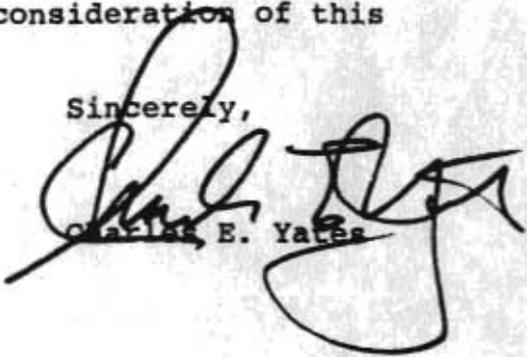
Re: MUR534

Dear Mr. Lipkin:

This will acknowledge receipt of the Commission's letter dated May 18, 1978 wherein you established a seven day deadline for the filing of a report by us on the above matter. However, prior to the filing of the report I request that you provide us with the position that the Commission is taking on the validity of 2 U.S.C. 441(b) in line with the U.S. Supreme Court decision of First National Bank of Boston v. Bellotti, 46 Law Week 4371.

Thank you for your prompt consideration of this matter.

Sincerely,



Charles E. Yates

CEY/cjj
cc: PSGA

79710107188

LAW OFFICES

MORIARTY LONG, MIKKELBORG & BROZ

3300 SEATTLE FIRST NATIONAL BANK BUILDING
SEATTLE WASHINGTON 98154

FEDERAL ELECTION
COMMISSION



'78 MAY 27 PM 11:44

Mr. Gary E. Lipkin
Federal Election Commission
1325 K Street NW
WASHINGTON DC 20463

20710101602



FEDERAL ELECTION COMMISSION

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

May 18, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Charles E. Yates
Moriarty, Long, Mikkelborg and Bros
3300 Seattle - First National Bank Building
Seattle, Washington 98154

Re: MUR 534

Dear Mr. Yates:

This is in response to your letter of May 5, 1978 in which you requested an extension of 30 days to complete the task of contacting Mr. Durning to seek a refund of the contribution made by the Puget Sound Gillnetters Association and its respective PAC in violation of 2 U.S.C. §441b(a).

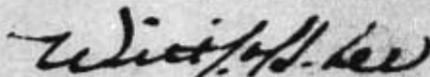
On April 24, 1978 a letter was mailed to Mr. Ben Cain, Treasurer of the Puget Sound Gillnetters PAC, and another to Mr. Phillip G. Sutherland, President of the Puget Sound Gillnetters Association. In these letters it was explained that the Federal Election Commission had found reason to believe that the Puget Sound Gillnetters Association and the Puget Sound Gillnetters Political Action Committee may have violated 2 U.S.C. §441b(a). As the Commission is under a duty to investigate this matter expeditiously, ten days were given to respond to the Commission's letter of notification. On May 2, 1978 you called the Commission in regard to this matter, and your call was returned on May 4, 1978 by Elizabeth Huber. The Commission received your letter of May 5, 1978, in which you stated your role as attorney for the Association and its PAC as well as your efforts to contact the candidate Mr. Durning, on May 8, 1978. Unfortunately the Commission is unable to grant you an extension of 30 days to complete this task. We will, however, grant you one week from the date of your receipt of this letter to file some report with the Commission concerning this matter.



Page 2
Letter to Charles E. Yates
Re: MUR 534

If you have any further questions, please feel free to contact Gary D. Lipkin (202) 523-4529, the attorney assigned to this matter.

Sincerely yours,



William C. Oldaker
General Counsel

LAW OFFICES

MORIARTY, LONG, MIKKELBORG & BROZ

3300 SEATTLE - FIRST NATIONAL BANK BUILDING

SEATTLE WASHINGTON 98154

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FEDERAL ELECTION
COMMISSION

Ms. Elizabeth Huber
Federal Election Commission
1325 K Street N.W.
WASHINGTON D.C. 20463



FEDERAL ELECTION COMMISSION

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

April 24, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ben Cain, Treasurer
Puget Sound Gillnetters Association
Political Action Committee
Fishermen's Terminal, Build. C-3, Room 103
Seattle, WA 98119

Re: MUR 534

Dear Mr. Cain:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that the Puget Sound Gillnetters Political Action Committee may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that your committee accepted \$1100.00 in corporate funds from the Puget Sound Gillnetters Association and subsequently contributed \$1000.00 of that money to the Durning for Congress Committee. Such action is prohibited by 2 U.S.C. §441b(a).

We have numbered this matter MUR 534.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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.



79040100194

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Conley Edwards, Jr. the staff member assigned to this matter, at 202-523-4026.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a) (3) (B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Charles N. Steele
Charles N. Steele
Associate General Counsel

79040100195

534 CB

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. The following service is requested (check one).
 Show to whom and date delivered.
 Show to whom, date, and address of delivery.
 RESTRICTED DELIVERY
 Show to whom and date delivered.
 RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery.
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO
 Ben Cain, Treasurer
 Budget Squad Gilmatters Assoc
 Political Action Comm
 Fishermen's Terminal, C-3 RML 03
 Seattle, WA 98119

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 943791

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
 4/15/77

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

INITIALS

© 1977-80-254-287



FEDERAL ELECTION COMMISSION

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

April 24, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Philip G. Sutherland, President
Puget Sound Gillnetters Association
Fishermen's Terminal, Build. C-3, Room 103
Seattle, WA 98119

Re: MUR 534

Dear Mr. Sutherland:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that the Puget Sound Gillnetters Political Action Committee may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that your corporation transferred from your treasury \$1100.00 in corporate funds to the Puget Sound Gillnetters Political Action Committee, which in turn contributed \$1,000.00 of the money to the Durning for Congress Committee.

We have numbered this matter MUR 534.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.



79040100196

If you have any questions, please contact Conley Edwards, Jr. the staff member assigned to this matter, at 202-523-4026.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Charles N. Steele
Charles N. Steele
Associate General Counsel

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SEND: Complete Form 1, 2, 3, 4, 5
Add your address in the "RETURN TO" space on label.

1. The following service is requested (check one):
 Show to whom and date delivered.
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 Show to whom, date, and address of delivery.
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 Philip G. Sutherland, Pres.
 Puget Sound Gillnetters Assoc
 Fishermen's Terminal, C-3
 Seattle, WA 98119

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 943792

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Address Authorized agent
Philip G. Sutherland

4. DATE OF DELIVERY: APR 26 1978 POSTMARK: (S)

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Puget Sound Gillnetters Association
Puget Sound Gillnetters Political
Action Committee

MUR 534 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 19, 1978, the Commission approved without objection the recommendations of the General Counsel as follows in the above-captioned matter:

1. Find reason to believe that Puget Sound Gillnetters Association violated 2 U.S.C. §441b(a) by making a corporate contribution in connection with a federal election.
2. Find reason to believe that Puget Sound Gillnetters Political Action Committee violated 2 U.S.C. §441b(a) by accepting a corporate contribution to be used in connection with a federal election.
3. Send proposed letters attached to the First General Counsel's Report dated April 14, 1978.

Date:

4-19-78

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Report dated: 4-14-78
Received in Office of Commission Secretary: 4-14-78, 2:13
Circulated on 24 hour no-objection basis: 4-18-78, 10:00

79040100198

MEMORANDUM TO: Major General
FROM: Elisea T. Galt
SUBJECT: WMS 336

Please have the attached copy register as WMS 336 distributed to the Commission on a 24-hour distribution basis.

Thank you.

79040100199

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL APR 14 1978
BY OGC TO THE COMMISSION

MUR NO. 534
DATE COMPLAINT RECEIVED
BY OGC
STAFF
MEMBER C. Edwards

COMPLAINANT'S NAME: Referred from Reports Analysis (Attachment I)

RESPONDENT'S NAME: Puget Sound Gillnetters Association
Puget Sound Gillnetters Political Action Committee

RELEVANT STATUTE: 2. U.S.C. §441b(a)

INTERNAL REPORTS CHECKED: Puget Sound Gillnetters PAC
Durning for Congress Committee
FEDERAL AGENCIES CHECKED: N/A

SUMMARY OF ALLEGATIONS

In a follow up telephone conversation regarding a RFAI about the opening cash balance of the PAC, the Reports Analysis Division was told that the \$1100.00 had been transferred from the Puget Sound Gillnetters Association 1/ (PSGA) treasury to the Puget Sound Gillnetters PAC (PAC) treasury. PSGA officials say this transfer was authorized by the PSGA's board of directors after it had decided to support Marvin Durning for Congress. The PAC subsequently contributed \$1,000.00 to the Durning for Congress Committee.

1/ The PSGA was originally incorporated in Washington state as a domestic non-profit corporation on 14 March 1974 and renewed its articles of incorporation on 16 January 1978, according to the Washington Secretary of State's Office.

RECEIVED

79040100200

PRELIMINARY LEGAL ANALYSIS

2 U.S.C. §441b(a) states that it is unlawful for any corporation to make a contribution or expenditure in connection with any election to any political office, or for any person to knowingly accept corporate funds in connection with a federal election. The PAC in this transaction appears to have been a conduit for a corporate contribution to a federal candidate. The report filed by the PAC (Attachment II) shows that the committee started with \$1100.00 and contributed a total of \$1,000.00 to the Durning for Congress Committee.

The Durning for Congress Committee reported (Attachment IV) receiving a \$1,000.00 contribution from the PAC on 25 April 1977. Although a report filed by the Durning for Congress Committee (Attachment III) shows a \$500.00 contribution received from the Puget Sound Gillnetters Association - not a PAC- on 18 March 1977, this \$500.00 contribution was returned to PSGA on 15 April 1977. At this time we have no other information suggesting that the Durning Committee was aware of the corporate origin of the PAC's contribution.

RECOMMENDATIONS

1. Find reason to believe that Puget Sound Gillnetters Association violated 2 U.S.C. §441b(a) by making a corporate contribution in connection with a federal election.
2. Find reason to believe that Puget Sound Gillnetters Political Action Committee violated 2 U.S.C. §441b(a) by accepting a corporate contribution to be used in connection with a federal election.

79040100201

3. Send attached letters.

79040100202

MUR 534
D. 23

Attachment I



FEDERAL ELECTION COMMISSION

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

February 10, 1978

MEMORANDUM FOR: Bill Oldaker

THROUGH: Orlando B. Potter *O.B.P.*
Lois Zella
Steve Mims *SM*

FROM: Ron Ewalt *RE*

SUBJECT: Puget Sound Gilnetters Political Action Committee

This committee is being submitted for possible MUR designation for the following reasons:

1. In a telephone conversation on 12/1/77 with the committee regarding a Request for Additional Information sent to the committee asking for the source of funds for the cash-on-hand balance for the beginning of its first report (October 10 Quarterly 1977), it was revealed that the association (Puget Sound Gilnetters Association) had transferred the \$1100 from the association treasury to the PAC treasury. The association is incorporated under Washington state law, according to the committee. In conversations with the secretary and with the chairman of the committee, Philip G. Sutherland, it was confirmed that the association had decided in a membership meeting in February 1977 to support Marvin Durning for Congress; the Board of Directors had authorized the transfer of the \$1100 from the association treasury to the PAC and had transferred \$1000 to the candidate. The funds from the association were not voluntary contributions received for the support of the PAC.
2. The committee was informed that the transfer appears to be a corporate contribution and that the candidate has received a possible corporate contribution, both prohibited by the FECA. It was suggested to the committee that it ask for a return of the contribution from Durning and then return that amount to the association, subsequently soliciting contributions from the membership if the committee still wishes to support Durning.
3. Review of Durning's reports disclose a \$500 contribution from the Puget Sound Gilnetters on 3/15/77, which was returned on 4/15/77, and



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PUGET SOUND GILLNETTERS POLITICAL ACTION COMMITTEE
PAGE 2

the \$1000 contribution on 4/25/77 as reported by the candidate. Durning for Congress committee shows a \$0 cash-on-hand balance on the latest report, the October 10 Quarterly.

These events raise the following questions:

1. The committee has received and transferred to a federal candidate possible corporate contributions.
2. The committee wishes to terminate reporting with the FEC.
3. The Durning for Congress committee according to its latest report may not be able to return the contribution.

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**Report of Receipts and Expenditures
 for a Candidate or Committee
 Supporting any Candidate(s) for
 Nomination or Election to Federal Office**

Attachment II
*Amended Report
 w/ Schedule B*

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 (a) Name of Candidate or Committee (in full) Check if name or address is changed
Puget Sound Gillnetters Association Political Action Comm

2 Identification Number
91-0920502

(b) Address (number and street)
Fishermen's Terminal, Bldg. C-3, Room 103

(c) City, State and ZIP code
Seattle, Washington 98119

3 (a) Is this a report of receipts and expenditures for only one election? Yes No
 (b) If "Yes," for which election?
Congress runoff on 4/21/77
(general, primary, runoff) (date)

4 Type of Report (Check appropriate box and complete, if applicable)

(a) Amendment For _____ (Which reports) (e) July 10 Quarterly Report
 (b) April 10 Quarterly Report (d) October 10 Quarterly Report
 (f) January 31 Year End Report
 (g) Termination Report
 (h) Tenth day report preceding **Congress primary** election on **4/21/77** in the State of **Washington**
(primary, general or convention) (date)
 (i) Thirtieth day report following _____ election on _____ in the State of _____
(primary, general or convention) (date)

5 Candidate or Committee Summary of Receipts and Expenditures
 6 Covering Period: From **April 1, 1977** Through **September 30, 1977**

Section A - Cash Balance Summary		Column A This Period	Column B Calendar Year-To-Date
6	Cash on hand January 1, 19 77	00	\$
7	Cash on hand at beginning of reporting period	\$ 1100.00	\$ 1100.00
8	Total receipts (from line 19)	\$	\$
(a)	Subtotal (Add lines 7 and 8)	\$	\$
9	Total expenditures (From line 26)	\$ 1000.00	\$ 1000.00
10	Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 100.00	\$ 100.00
11	Contributed items on hand to be liquidated (attach itemized list)	\$	\$
Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)			
12	Operating expenditures (from line 20)	\$ 1000.00	\$
13	Refunds and Rebates (from line 17)	\$	\$
14 (a)	Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b)	Expenditures from prior years subject to limitation	\$	\$
(c)	Total expenditures subject to limitation (Add lines 14a and 14b)	\$	\$

I certify that I have examined this Report, and to the best of my knowledge and belief it is true, correct and complete.
Philip G. Sutherland *Philip G. Sutherland* **11-1-77**
(Typed Name of Treasurer or Candidate) (Signature of Treasurer or Candidate) (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 or § 441 (See reverse side of form)

Attachment II
 con't

Detailed Summary Schedule of Receipts and Expenditures

(Page 2)

Name of Candidate or Committee	REPORT COVERING THE PERIOD	
	FROM:	TO:
PART I - RECEIPTS	Column A This Period	Column B Calendar year-to-date
15 Contributions and other income:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Sales and Collections Included Above: List by event on memo Schedule D (\$		
(d) Subtotal of contributions and other income	\$	\$
16 Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments received	\$	\$
17 Refunds, Rebates, Returns Received:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of refunds, rebates, returns	\$	\$
18 Transfers In:		
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)	\$	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)	\$	
(c) Subtotal of transfers in	\$	\$
19 Total Receipts	\$	\$
PART II - EXPENDITURES		
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of operating expenditures	\$	\$
21 Independent Expenditures (use Schedule E)	\$	\$
22 Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments made and contribution refunds	\$	\$
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures:		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of fundraising expenditures	\$	\$
24 Transfers Out:		
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)	\$	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)	\$ 1000.00	
(c) Subtotal of transfers out	\$	\$
25 Total Expenditures	\$	\$
PART III - DEBTS AND OBLIGATIONS		
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)	\$	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)	\$	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
28 Total Receipts (from line 19)	\$	
29 Transfers In (from line 18(a))	\$	
30 Net Receipts (Subtract line 29 from line 28)	\$	
31 Total Expenditures (from line 25)	\$	
32 Transfers out (from line 24(a))	\$	
33 Net Expenditures (Subtract line 32 from line 31)	\$	

Schedule B.
1976
Federal Election Commission
1100 L Street, N.W.
Washington, D.C. 20463

Unlimited Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(See instructions on back)

Attachment II

Page _____ of _____ for

LINE NUMBER 24 (b)

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

Puget Sound Political Action Committee

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Marvin B. Durning, Attorney 1411 - 4th Avenue Seattle, Washington 98104	Support for Candidate for Congress District #7	4/1/77- 9/30/77	\$1000.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Subtotal of expenditures this page (optional)			\$ 1000.00
Total this period (last page this line number only)			\$ 1000.00

PEC Form 3
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

**Report of Receipts and Expenditures
for a Candidate or Committee
Supporting any Candidate(s) for
Certified Nomination or Election to Federal Office**

Attachment III

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Candidate or Committee (in full) <input type="checkbox"/> Check if name or address is changed Durning for Congress Committee	2 Identification Number 068748
(b) Address (number and street) 110 Cherry St Suite 304 MAR 24 1977	2(a) Is this a report of receipts and expenditures for only one election? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(c) City, State and ZIP code Seattle, WA 98104	(b) If "Yes," for which election? primary on April 5, 77 (general, primary, runoff) (date)

4 Type of Report (Check appropriate box and complete, if applicable)

(a) <input type="checkbox"/> Amendment For _____ (which report)	(c) <input type="checkbox"/> July 10 Quarterly Report	(e) <input type="checkbox"/> January 31 Year End Report
(b) <input type="checkbox"/> April 10 Quarterly Report	(d) <input type="checkbox"/> October 10 Quarterly Report	(f) <input type="checkbox"/> Monthly Report (Month)
(h) <input checked="" type="checkbox"/> Tenth day report preceding special primary election on 4/5/77 in the State of Washington (primary, general or convention) (date)		(g) <input type="checkbox"/> Termination Report
(i) <input type="checkbox"/> Thirtieth day report following _____ election on _____ in the State of _____ (primary, general or convention) (date)		

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From **1/12/77** Through **3/21/77**

Section A - Cash Balance Summary	Column A This Period	Column B Calendar Year To-Date
6 Cash on hand January 1, 19		\$ N/A
7 Cash on hand at beginning of reporting period	\$ -0-	
8 Total receipts (from line 18)	\$ 55,378.41	\$
(a) Subtotal (Add lines 7 and 8)	\$ 55,378.41	\$
9 Total expenditures (From line 28)	\$ 48,648.59	\$
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 6,729.82	\$
11 Contributed items on hand to be liquidated (attach itemized list)	\$	\$
Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)		
12 Operating expenditures (from line 20)	\$	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation	\$	\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)	\$	\$

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

Joan Singler, Treasurer *Joan Singler* **3/24/77**
(Typed Name of Treasurer or Candidate) (Signature of Treasurer or Candidate) (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 or §441 (See reverse side of form)

For further information Contact: Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463
Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

7701121840

Schedule A
 July 1976
 Federal Election Commission
 1325 N Street, N.W.
 Washington, D.C. 20463

**Itemized Receipts,
 Contributions, Ticket Purchases, Loans,
 Rebates, and Transfers for Line
 Numbers 15, 16, 17 and/or 18 of FEC Form 3**
 (See Instructions on back)

Page con 4 of for
LINE NUMBER 15A
 (Use separate schedule(s) for each
 numbered line)

Name of Candidate or Committee in full

DURNING FOR CONGRESS 068748

Full Name, mailing address and ZIP code	Occupation	Date (month, day, year)	Amount of each receipt this period
Herdis Benediktson, 4609 41st Ave NE Seattle, WA 98105 Principal place of business	retired <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 50.00	3/18/77	50.00
Alice Franklin Bryant 2813 Broadway E Seattle Principal place of business	retired <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 200.00	3/18/77	100.00
Jenia K. Collins 400 36th Ave Seattle, WA 98122 Principal place of business	speech therapist <input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 50.00	3/18/77	50.00
Jeff Goltz Rt 7 Box 644 Olympia, WA 98506 Principal place of business	attorney <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 50.00	3/18/77	30.00
Don Paresenin 2407 A Court Melody Lane Enumclaw, WA 98022 Country Club Business	restaurant owner <input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 50.00	3/18/77	50.00
Puget Sound Gillnetters Association Fishermen's Terminal Bldg. C-3 Room 103 Seattle, WA 98119 Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 500.00	3/18/77	500.00
Subtotal of receipts this page (optional)			\$ 780.00
Total this period (last page this line number only)			\$

7701211844

CERTIFIED

EC Form 3 MAY 4 1977
July 1976
Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20463

Report of Receipts and Expenditures
for a Candidate or Committee
Supporting any Candidate(s) for
Nomination or Election to Federal Office

Attachment Tr

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Candidate or Committee (in full) Check if name or address is changed

Durning for Congress C00075523

(b) Address (number and street)

110 Cherry St. Suite 304

(c) City, State and ZIP code

Seattle, WA 98104

2 Identification Number:

(C00075523) 068748

3(a) Is this a report of receipts and expenditures for only one election? Yes No

(b) If "Yes," for which election?

(General, primary, runoff) on (Date)

4 Type of Report (Check appropriate box and complete, if applicable)

(a) Amendment For (which report) (e) July 10 Quarterly Report
(f) October 10 Quarterly Report

(b) April 10 Quarterly Report

(h) Tenth day report preceding general election on 5/17/77 in the State of Washington
(primary, general or convention) (Date)

(i) Thirtieth day report following primary election on 4/5/77 in the State of Washington
(primary, general or convention) (Date)

(e) January 31 Year End Report

(f) Monthly Report (Month)

(g) Termination Report

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From

Through

Section A - Cash Balance Summary

Column A
This Period

Column B
Calendar Year To Date

6 Cash on hand January 1, 19

\$

7 Cash on hand at beginning of reporting period

\$ 6,729.82

8 Total receipts (from line 18)

\$80,540.30

\$ 135,918.71

(a) Subtotal (Add lines 7 and 8)

\$87,270.12

\$ 135,918.71

9 Total expenditures (From line 25)

\$69,539.49

\$ 118,188.08

10 Cash on hand at close of reporting period (Subtract line 9 from line 8)

\$17,730.63

\$ 17,730.63

11 Contributed items on hand to be liquidated (attach itemized list)

\$

Section B - Presidential Campaign Expenditures Subject to Limitation - Summary
(To Be Used Only By Presidential Candidates Receiving Federal Funds)

12 Operating expenditures (from line 20)

\$

\$

13 Refunds and Rebates (from line 17)

\$

\$

14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)

\$

\$

(b) Expenditures from prior years subject to limitation

\$

\$

(c) Total expenditures subject to limitation (Add lines 14a and 14b)

\$

\$

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

Joan Singler

(Typed Name of Treasurer or Candidate)

Joan Singler

(Signature of Treasurer or Candidate)

May 2, 1977

(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 or § 441. (See reverse side of form.)

For further information Contact:

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

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

77011223627

Schedule A
 January 1976
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20543

**Itemized Receipts,
 Contributions, Ticket Purchases, Loans,
 Rebates, and Transfers for Line
 Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See instructions on back)

A Attachment IV
 Page _____ of _____ for _____ cont.
 LINE NUMBER 100
 (Use separate schedule(s) for each numbered line).

Name of Candidate or Committee in full		Date (month, day, year)	Amount of each receipt this period
DUNTING FOR CONGRESS C00075523 Deposit of 4/25/77			
Full Name, mailing address and ZIP code Cannors Public Affairs Committee (Leg. affairs Div of Nat'l Cannors) 12425 Rockport Drive, Silver Spring, Maryland 20904		4/25/77	100.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-Date \$ 100.00		
Full Name, mailing address and ZIP code Pudget Sound Billnetters Assoc. Political Action Committee Fisnerman's Terminal Bldg., C-3, Room 103, Seattle, 98113		4/25/77	1,000.00
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$ 1,000.00		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$		
Subtotal of receipts this page (optional)			\$ 1,100.00
Total this period (last page this line number only)			\$

77011223663*

Schedule B

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

**Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3**

(see Instructions on back)

Page _____ of _____ for

LINE NUMBER 22A

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

Durning for Congress C00075523

Full Name, mailing address and ZIP code

 Puget Sound Gilnetters Association
Fishermen's Terminal Bldg C-3 Room 103
Seattle, WA 98119

Purpose of Expenditure

refund of contribution

Date (month, day, year)

4/15/77

Amount of each expenditure this period

\$375

500.00

Full Name, mailing address and ZIP code

11th District Democrats
c/o Bruce McKay, Chairperson
241 Factory N
Renton, WA 98055

Purpose of Expenditure

refund of contribution

Date (month, day, year)

4/18/77

Amount of each expenditure this period

\$380

750.00

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Subtotal of expenditures this page (optional)

\$1250.00

Total this period (last page this line number only)

\$

77011223709



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Philip G. Sutherland, President
Puget Sound Gillnetters Association
Fishermen's Terminal, Build. C-3, Room 103
Seattle, WA 98119

Re: MUR 534

Dear Mr. Sutherland:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that the Puget Sound Gillnetters Political Action Committee may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that your corporation transferred from your treasury \$1100.00 in corporate funds to the Puget Sound Gillnetters Political Action Committee, which in turn contributed \$1,000.00 of the money to the Durning for Congress Committee.

We have numbered this matter MUR 534.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.



79040100213

If you have any questions, please contact Conley Edwards, Jr. the staff member assigned to this matter, at 202-523-4026.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a) (3) (B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

79040100214



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ben Cain, Treasurer
Puget Sound Gillnetters Association
Political Action Committee
Fishermen's Terminal, Build. C-3, Room 103
Seattle, WA 98119

Re: MUR 534

Dear Mr. Cain:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that the Puget Sound Gillnetters Political Action Committee may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that your committee accepted \$1100.00 in corporate funds from the Puget Sound Gillnetters Association and subsequently contributed \$1000.00 of that money to the Durning for Congress Committee. Such action is prohibited by 2 U.S.C. §441b(a).

We have numbered this matter MUR 534.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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.



79040100215

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Conley Edwards, Jr. the staff member assigned to this matter, at 202-523-4026.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

79040100216



FEDERAL ELECTION COMMISSION

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

APRIL 3, 1978

MEMORANDUM TO: ELISSA GARR
FROM: MARJORIE EMMONS
RE: MUR 534

MWE

At the Executive Session of March 9, 1978, Commissioner Tiernan raised a question about the General Counsel's Report on MUR 534 which had been circulated on a no-objection basis.

General Counsel Oldaker stated that the report would be re-circulated with a memorandum attached from the Reports Analysis Division, said memo signed by Steve Mims.

There was no vote on the matter (nor even a motion).

79040100217



FEDERAL ELECTION COMMISSION

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

TO THE GOV
*353

MARCH 7, 1978

MEMORANDUM TO: WILLIAM C. OLDAKER
FROM: MARJORIE W. EMMONS
RE: COMPLIANCE CERTIFICATIONS/OBJECTIONS

MDC

79040100219

Pursuant to your direction that certifications should be forwarded to the Office of the General Counsel within two hours after the registered deadline for a twenty-four hour no-objection compliance recommendation from OGC, we forwarded to you earlier today certifications on the following MURS, each of which bore an 11:00 A. M. deadline of March 7, 1978:

- MUR 482 (77)
- MUR 534 (78)
- MUR 529 (78)
- MUR 483 (77)

At 3:22 p.m. March 7, Commissioner Tiernan's office filed an "objection" to each of the above-named reports.

Please advise.

CC: Commissioner Tiernan
Orlando Potter
Files



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Puget Sound Gillnetters
Association, Inc.
Puget Sound Gillnetters
Political Action Comm.

MUR 534 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on March 7, 1978, the Commission accepted the recommendations of the General Counsel as follows:

1. Find reason to believe that Puget Sound Gillnetters Association, Inc. violated 2 U.S.C. §441b(a).
Send letter attached to the First General Counsel's Report.
2. Find reason to believe that Puget Sound Gillnetters Political Action Committee violated 2 U.S.C. §441b(a).
Send letter attached to the First General Counsel's Report.

Date: 3-7-78

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Report dated:	Undated
Received in Commission Secretary's Office:	March 3, 1978, 5:11
Circulated to the Commissioners:	March 6, 1978, 11:00
Method of Circulation:	24 Hour No-objection Basis

79040107220

March 2, 1948

MEMORANDUM TO: Marge Eames
FROM: Alice S. Cary
SUBJECT: MUR 334

Please have the attached 7 day report on MUR 334 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

79040100221

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

GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION _____

MUR NO. 534
DATE COMPLAINT RECEIVED
BY OGC 2-27-78

ATTORNEY C. Edwards

COMPLAINANT'S NAME: Internally Generated/Reports Analysis

RESPONDENT'S NAME: Puget Sound Gillnetters Association, Inc.
Puget Sound Gillnetters Political Action Comm.

RELEVANT STATUTE: 2 U.S.C. §441b(a)

INTERNAL REPORTS CHECKED: Puget Sound Gillnetters PAC
Durning for Congress

FEDERAL AGENCIES CHECKED: N/A

SUMMARY OF ALLEGATIONS

The final report of the Puget Sound Gillnetters PAC (PSG) revealed that there was a transfer of eleven hundred dollars (\$1100.00) from the Puget Sound Gillnetters Association, Inc: (PSGA) treasury to the PSG's treasury. This transfer of corporate funds was apparently authorized by the PSGA's board of directors after they had decided to support Marvin Durning for Congress in violation of 2 U.S.C. §441b(a). PSG subsequently contributed one thousand dollars (\$1,000.00) of the corporate funds to the Durning for Congress Committee also in violation of 2 U.S.C. §441b(a).

PRELIMINARY LEGAL ANALYSIS

2 U.S.C. §441b(a) states that:

It is unlawful for...any corporation organized by authority of any law of Congress, to make a contribution or expenditure in connection with any election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for any political office,....

The association was originally incorporated under Washington state law on 14 March 1974 and renewed 16 January 1978, according to the Washington Secretary of State's office.

Im light of the above, corporate funds were transferred to a PAC in violation of 2 U.S.C. §441b(a). And the PAC in turn contributed over ninety percent (90%) of these funds to a candidate for a federal office, also in violation of 2 U.S.C. §441b(a).

From all reports it appears that this contribution from the PAC was received by the candidate's committee without knowledge of its origin.

RECOMMENDATION

1. Find reason to believe that Puget Sound Gillnetters Association, Inc. violated 2 U.S.C. §441b(a). Send attached letter.
2. Find reason to believe that Puget Sound Gillnetters Political Action Committee violated 2 U.S.C. §441b(a). Send attached letter.

79010100203



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ben Cain, Treasurer
Puget Sound Gillnetters Association
Political Action Committee
Fishermen's Terminal, Build. C-3, Room 103
Seattle, WA 98119

Re: MUR 534

Dear Mr. Cain:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that your committee, the Puget Sound Gillnetters Political Action Committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that your committee made a one thousand dollar (\$1,000.00) political contribution to a candidate for a federal office in violation of 2 U.S.C. §441b(a). We have numbered this matter MUR 534.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Conley Edwards, Jr, the staff member assigned to this matter, at 202-523-4143.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a) (3) (B) unless you notify the

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Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

70040100225



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Philip G. Sutherland, President
Puget Sound Gillnetters Association
Fishermen's Terminal, Build. C-3, Room 103
Seattle, WA 98119

Re: MUR 534

Dear Mr. Sutherland:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that your corporation, the Puget Sound Gillnetters Association, Inc., may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that [describe violation] that your corporation transferred from your treasury to the Puget Sound Gillnetters Political Action Committee eleven hundred dollars (\$1100.00) in violation of 2 U.S.C. §441b(a). We have numbered this matter MUR 534.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions please contact Conley Edwards, Jr., the staff member assigned to this matter, at 202-523-4143.

This matter will remain confidential in accordance with

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2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

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FEDERAL ELECTION COMMISSION

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

February 10, 1978

MEMORANDUM FOR: Bill Oldaker

THROUGH: Orlando B. Potter *O.B.P.*
Lois Zella
Steve Mims *SM*

FROM: Ron Ewalt *RE*

SUBJECT: Puget Sound Gillnetters Political Action Committee

This committee is being submitted for possible MUR designation for the following reasons:

1. In a telephone conversation on 12/1/77 with the committee regarding a Request for Additional Information sent to the committee asking for the source of funds for the cash-on-hand balance for the beginning of its first report (October 10 Quarterly 1977), it was revealed that the association (Puget Sound Gillnetters Association) had transferred the \$1100 from the association treasury to the PAC treasury. The association is incorporated under Washington state law, according to the committee. In conversations with the secretary and with the chairman of the committee, Philip G. Sutherland, it was confirmed that the association had decided in a membership meeting in February 1977 to support Marvin Durning for Congress; the Board of Directors had authorized the transfer of the \$1100 from the association treasury to the PAC and had transferred \$1000 to the candidate. The funds from the association were not voluntary contributions received for the support of the PAC.
2. The committee was informed that the transfer appears to be a corporate contribution and that the candidate has received a possible corporate contribution, both prohibited by the FECA. It was suggested to the committee that it ask for a return of the contribution from Durning and then return that amount to the association, subsequently soliciting contributions from the membership if the committee still wishes to support Durning.
3. Review of Durning's reports disclose a \$500 contribution from the Puget Sound Gillnetters on 3/15/77, which was returned on 4/15/77, and



continued

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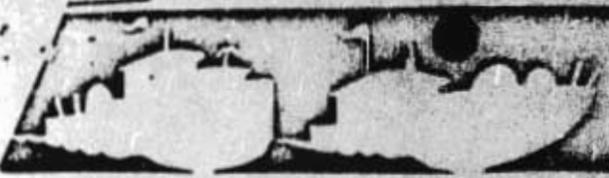
PUGET SOUND GILNETTERS POLITICAL ACTION COMMITTEE
PAGE 2

the \$1000 contribution on 4/25/77 as reported by the candidate. Durning for Congress committee shows a \$\$ cash-on-hand balance on the latest report, the October 10 Quarterly.

These events raise the following questions:

1. The committee has received and transferred to a federal candidate possible corporate contributions.
2. The committee wishes to terminate reporting with the FEC.
3. The Durning for Congress committee according to its latest report may not be able to return the contribution.

70040100229



puget sound
gillnetters association

FISHERMENS TERMINAL, DECK BUILDING, ROOM 103
SEATTLE, WASHINGTON 98119
(206) 494-9530

DEC 16 AM 8:02

December 12, 1977

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

Attention: Mr. Orlando B. Potter
Staff Director

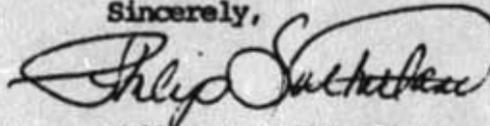
Dear Sir:

In reference to your letter of November 24, 1977 to Mr. Ben Cain our Association Treasurer, regarding errors made on October 10th quarterly report.

Repeated attempts to contact Mr. Ronald Ewalt at 800-424-9530 for assistance in understanding this matter have been unsuccessful. Is there some one in the Seattle area we could contact.

Our primary interest is in closing this account out since it is not our Association's custom to participate with candidate assistance in other than individual basis.

Sincerely,



Philip G. Sutherland
President

PGS/tp

79040100230

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REC'D
FEDERAL ELECTION
COMMISSION

77 DEC 16 AM 8:01

SEATTLE, WA 981
PM 1
12 DEC
1977

FOR EQUAL OPPORTUNITY FISHERIES

Mr. Orlando B. Potter
Staff Director
Federal Election Committee
1325 K. Street N. W.
Washington, D. C. 20463

FOR EQUAL OPPORTUNITY FISHERIES

Puget Sound
Billnetter Association

FISHERMEN'S TERMINAL C-3 BUILDING, ROOM 103
SEATTLE, WASHINGTON 98119

**Report of Receipts and Expenditures
 for a Candidate or Committee
 Supporting any Candidate(s) for
 Nomination or Election to Federal Office**

*Amended Report
 w/ Schedule B*

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Candidate or Committee (in full) Check if name or address is changed
Puget Sound Gillnetters Association Political Action Committee

2 Identification Number
91-0920502

(b) Address (number and street)
Fishermen's Terminal, Bldg. C-3, Room 103

(c) City, State and ZIP code
Seattle, Washington 98119

3(a) Is this a report of receipts and expenditures for only one election? Yes No

(b) If "Yes," for which election?
Congress runoff on **4/21/77**
 (general, primary, runoff) (date)

4 Type of Report (Check appropriate box and complete, if applicable)

(a) Amendment For _____ (Which report) (e) July 10 Quarterly Report

(b) April 10 Quarterly Report (d) October 10 Quarterly Report

(h) Tenth day report preceding **Congress-primary** election on **4/21/77** in the State of **Washington**
 (primary, general or convention) (date)

(i) Thirtieth day report following _____ election on _____ in the State of _____
 (primary, general or convention) (date)

(f) January 31 Year End Report
 (g) Monthly Report _____ (Month)
 (j) Termination Report

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From **April 1, 1977** Through **September 30, 1977**

Section A - Cash Balance Summary		Column A This Period	Column B Calendar Year-To-Date
6	Cash on hand January 1, 19 77	00	\$
7	Cash on hand at beginning of reporting period	\$ 1100.00	1100.00
8	Total receipts (from line 19)	\$	\$
9	(a) Subtotal (Add lines 7 and 8)	\$	\$
9	Total expenditures (From line 25)	\$ 1000.00	\$ 1000.00
10	Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 100.00	\$ 100.00
11	Contributed items on hand to be liquidated (attach itemized list)	\$	\$
Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)			
12	Operating expenditures (from line 20)	\$ 1000.00	\$
13	Refunds and Rebates (from line 17)	\$	\$
14 (a)	Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b)	Expenditures from prior years subject to limitation	\$	\$
(c)	Total expenditures subject to limitation (Add lines 14a and 14b)	\$	\$

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

Philip G. Sutherland *Philip G. Sutherland* **11-1-77**
 (Typed Name of Treasurer or Candidate) (Signature of Treasurer or Candidate) (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 or § 441j (See reverse side of form)

Detailed Summary Schedule of Receipts and Expenditures

(Page 2)

Name of Candidate or Committee	REPORT COVERING THE PERIOD	
	FROM:	TO:
PART I - RECEIPTS		
15 Contributions and other income:	Column A This Period	Column B Calendar year-to-date
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Sales and Collections Included Above: List by event on memo Schedule D (\$		
(d) Subtotal of contributions and other income	\$	\$
16 Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments received	\$	\$
17 Refunds, Rebates, Returns Received:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of refunds, rebates, returns	\$	\$
18 Transfers In:		
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)	\$	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)	\$	
(c) Subtotal of transfers in	\$	\$
19 Total Receipts	\$	\$
PART II - EXPENDITURES		
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of operating expenditures	\$	\$
21 Independent Expenditures (use Schedule E)	\$	\$
22 Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments made and contribution refunds	\$	\$
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures:		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of fundraising expenditures	\$	\$
24 Transfers Out:		
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)	\$	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)	\$ 1,000.00	
(c) Subtotal of transfers out	\$	\$
25 Total Expenditures	\$	\$
PART III - DEBTS AND OBLIGATIONS		
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)	\$	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)	\$	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
28 Total Receipts (from line 19)	\$	
29 Transfers In (from line 18(a))	\$	
30 Net Receipts (Subtract line 29 from line 28)	\$	
31 Total Expenditures (from line 25)	\$	
32 Transfers out (from line 24(a))	\$	
33 Net Expenditures (Subtract line 32 from line 31)	\$	

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

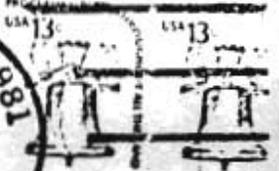
(see instructions on back)

Name of Candidate or Committee in full			
Puget Sound Political Action Committee			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Marvin B. Durning, Attorney 1411 - 4th Avenue Seattle, Washington 98104	Support for Candidate for Congress District #7	6/2/77- 9/30/77	\$1000.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Subtotal of expenditures this page (optional)			\$ 1000.00
Total this period (last page this line number only)			\$ 1000.00

WA 981
PM
DEC 21
1977

SEATTLE, WA 981
PM
DEC 21
1977

SEATTLE, WA 981
PM
DEC 21
1977



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

DEC 27 AM 9:19

70040100235



FEDERAL ELECTION COMMISSION

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

November 24, 1977

Mr. Ben Cain, Treasurer
Puget Sound Gillnetters Association
Political Action Committee
Fishermen's Terminal, Build. C-3, Room 103
Seattle, WA 98119

Dear Mr. Cain:

This letter is prompted by our interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended.

During review of the October 10 Quarterly Report of Receipts and Expenditures, we noticed that you omitted information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within (10) days of receipt of this letter. If you have any questions, please do not hesitate to contact Ronald Ewalt (800-424-9530) our Reports Analyst assigned to you.

Sincerely,

Orlando B. Potter
Staff Director

Attachment

12



79040100235
77030621376

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

PUGET SOUND GILNETTERS ASSOCIATION

DATE: 11/24/77

POLITICAL ACTION COMMITTEE

LD. NO.: C00077008

REQUEST FOR ADDITIONAL INFORMATION FOR THE October 10 Quarterly REPORT OF RECEIPTS
EXPENDITURES COVERING THE PERIOD ? THROUGH ?
ASUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

Review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

- Coverage Dates omitted or incorrect
- Signature omitted or incorrect SEE OTHER (1)
- Summary Page Line(s) Column(s) Totals omitted or incorrect
- Detailed Summary (Page 2) Line(s) ²⁴ Column(s) ^{A&B} Totals omitted or incorrect SEE PAGE 2
- Schedule Totals disagree with Detailed Summary (Page 2) or omitted
- Date(s) omitted or inadequate for Schedule(s) Line(s)
- Full Name(s) Omitted for Schedule(s) Line(s)
- Mailing Address(es) omitted or inadequate for Schedule(s) Line(s)
- Occupational Descriptions omitted or inadequate for Schedule(s) Line(s)
- Principal Place(s) of Business omitted or inadequate for Schedule(s) Line(s)
- Aggregate Year-to-date Totals omitted or inadequate for Schedule(s) Line(s)
- Nature or Purpose of Expenditure omitted or inadequate for Schedule(s) Line(s)
- Nature or Purpose of Receipt omitted or inadequate for Schedule(s) Line(s)
- Inadequate Description of proceeds dates events location of Schedule
- Other: (1) Please be advised that all reports must be signed by the treasurer or his/her designated agent, as identified on an amendment to the Statement of Organization.
(2) Political committees which have a cash-on-hand at the time of registration shall disclose on their first report the source of such funds, including the information as required by 0 U.S.C. 434 (b).

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Disclosure Division toll free at (800) 424-9530. The local Washington, D.C. telephone number is (202) 523-4048.

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

REQUEST FOR ADDITIONAL INFORMATION
PUGET SOUND GILLNETTERS ASSOCIATION POLITICAL ACTION COMMITTEE
Page 2

Please amend the Detailed Summary Page and provide a Schedule B
for the entry of \$1000 on Line 9 of the Summary Page.

79040100238
77030621378

**Report of Receipts and Expenditures
for a Candidate or Committee
Supporting any Candidate(s) for
Nomination or Election to Federal Office**

FEDERAL ELECTION
COMMISSION

Federal Election Commission
1100 ...
Washington, D.C. 20463

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

<p>1(a) Name of Candidate or Committee (in full) <input type="checkbox"/> Check if name or address is changed Puget Sound Gillnetters Association Political Action Committee</p> <p>(b) Address (number and street) Fishermen's Terminal, Bldg. C-3, Room 103</p> <p>(c) City, State and ZIP code Seattle, Washington 98119</p>	<p>2 Identification Number 91-0920502</p> <p>3(a) Is this a report of receipts and expenditures for only one election? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(b) If "Yes," for which election? Congress runoff on 4/21/77 (general, primary, runoff) (date)</p>
<p>4 Type of Report (Check appropriate box and complete, if applicable)</p> <p>(a) <input type="checkbox"/> Amendment For _____ (Which report) (a) <input type="checkbox"/> July 10 Quarterly Report (b) <input type="checkbox"/> April 10 Quarterly Report (c) <input checked="" type="checkbox"/> October 10 Quarterly Report</p> <p>(d) <input type="checkbox"/> Tenth day report preceding <u>Congress primary</u> election on <u>4/21/77</u> in the State of <u>Washington</u> (primary, general or convention) (date)</p> <p>(e) <input type="checkbox"/> Thirtieth day report following _____ election on _____ in the State of _____ (primary, general or convention) (date)</p>	
<p>4(e) <input type="checkbox"/> January 31 Year End Report (f) <input type="checkbox"/> Monthly Report (Month) (g) <input type="checkbox"/> Termination Report</p>	

79010100239

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From _____ Through _____

Section A - Cash Balance Summary	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19 <u>77</u>	00	\$
7 Cash on hand at beginning of reporting period	\$ 1100.00	\$ 1100.00
8 Total receipts (from line 19)	\$	\$
(a) Subtotal (Add lines 7 and 8)	\$	\$
9 Total expenditures (From line 25)	\$ 1000.00	\$ 1000.00
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 100.00	\$ 100.00
11 Contributed items on hand to be liquidated (attach itemized list)	\$	\$
Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)		
12 Operating expenditures (from line 20)	\$	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation	\$	\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)	\$	\$

I certify that I have examined this Report, and to the best of my knowledge and belief it is true, correct and complete.
Philip G. Sutherland (Typed Name of Treasurer or Candidate) *Philip G. Sutherland* (Signature of Treasurer or Candidate) 11-1-77 (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 or § 441j (See reverse side of form)

Commission
N.W.
D.C. 20463

Detailed Summary Schedule of Receipts and Expenditures

(Page 2)

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Name of Candidate or Committee	REPORT COVERING THE PERIOD	
	FROM:	TO:
PART I - RECEIPTS	Column A This Period	Column B Calendar year-to-date
15 Contributions and other income:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Sales and Collections Included Above: List by event on memo Schedule D (\$		
(d) Subtotal of contributions and other income	\$	\$
16 Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments received	\$	\$
17 Refunds, Rebates, Returns Received:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of refunds, rebates, returns	\$	\$
18 Transfers In:		
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)	\$	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)	\$	
(c) Subtotal of transfers in	\$	\$
19 Total Receipts	\$	\$
PART II - EXPENDITURES		
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of operating expenditures	\$	\$
21 Independent Expenditures (use Schedule E)	\$	\$
22 Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments made and contribution refunds	\$	\$
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures:		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of fundraising expenditures	\$	\$
24 Transfers Out:		
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)	\$ -00-	-00-
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)	\$ -00-	-00-
(c) Subtotal of transfers out	\$	\$
25 Total Expenditures	\$	\$
PART III - DEBTS AND OBLIGATIONS		
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)	\$	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)	\$	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
28 Total Receipts (from line 19)	\$	
29 Transfers In (from line 18(a))	\$	
30 Net Receipts (Subtract line 29 from line 28)	\$	
31 Total Expenditures (from line 25)	\$	
32 Transfers out (from line 24(a))	\$	
33 Net Expenditures (Subtract line 32 from line 31)	\$	

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1977

FEDERAL ELECTIONS
COMMISSION

FOR EQUAL OPPORTUNITY FISHERIES
77 NOV 4 1977

FOR EQUAL OPPORTUNITY FISHERIES

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

FOR EQUAL OPPORTUNITY FISHERIES



7 FISHermen's TERMINAL BUILDING ROOM 103
SEATTLE, WASHINGTON 98119

MEMORANDUM FOR THE FILES

DATE: 11/1/77

FROM: RON EWALT

RE: PUGET SOUND GILLNETTERS PAC
Q3 Non-filers notice

Tery Pirios called in reference to the mailgram. The committee didn't think that it had to file due to activity under \$1000. The committee was informed that it was required to file a 3a postcard, to which they said that they would send one shortly.

79040100242



FEDERAL ELECTION COMMISSION

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

October 31, 1977

It has come to the attention of the Federal Election Commission that you may have failed to file an October 10 Quarterly Report of Receipts and Expenditures as required by the Federal Election Campaign Act.

Your apparent failure to file the October 10 Report gives the Commission reason to believe you are in possible violation of 2 U.S.C. §134.

You are hereby afforded a reasonable opportunity to demonstrate why no action should be taken against you. If you have not filed the required report, you should do so within ten (10) days of receipt of this notice with the Federal Election Commission, 1325 K Street, N.W., Washington, DC, 20463. However, if you have filed the above mentioned report or if you require additional information, please contact our Disclosure Division on the Toll Free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas E. Harris
Chairman



79040100243

MEMORANDUM FOR THE FILE: PUGET SOUND GILNETTERS POLITICAL ACTION COMMITTEE

FROM : STEVE MIMS

DATE : OCTOBER 5, 1977

UPON REVIEW OF THE FILE, I NOTICED THAT THE COMMITTEE HAD NOT FILED ANY REPORTS SINCE ITS REGISTRATION STATEMENT WAS FILED IN APRIL, 1977. THE COMMITTEE HAS NEVER BEEN ON ANY NON-FILERS LIST FOR SOME UNKNOWN REASON. I SPOKE WITH THE ASSISTANT TREASURER TERRY PROIOS (206-284-8520) REGARDING THE COMMITTEE'S APPARENT FAILURE TO FILE THE JULY QUARTERLY REPORT. SHE INDICATED THAT SHE WAS SURE ONE HAD BEEN FILED AND THAT THE ONLY CONTRIBUTION TO ANY CANDIDATES WAS TO MARVIN DURNING. I FEEL THAT THERE IS SOME MISUNDERSTANDING AS TO THEIR INTERPRETATION OF THE FILING REQUIREMENTS UNDER THE FECA SINCE SHE INDICATED THAT THEIR ONLY REPORT WOULD INCLUDE THE CONTRIBUTION TO DURNING AND THAT ALL OTHER REQUIRED REPORTS WOULD BE SUBMITTED TO THE STATE BOARD IN OLYMPIA. FURTHERMORE, SHE INDICATED THAT THEY HAD NEVER RECEIVED ANY FORMS FROM THE FEC (THE REGISTRATION WAS FILED ON FORM 1) SO NEW FORM 3'S WERE MAILED OUT TODAY.

Statement of Organization For a Political Committee

Supporting any candidate(s) for federal office and anticipating contributions or expenditures in excess of \$1,000 in any calendar year in support of such candidate(s).

(See Reverse Side For Instructions.)

RECEIVED
FEDERAL ELECTION
COMMISSION

'77 APR 26 11:14

Election Commission
1100 K Street, N.W.
Washington, D.C. 20463

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Committee (in full) <input type="checkbox"/> Check if name or address is changed Puget Sound Gillnetters Political Action Committee	2 Identification Number Tax ID: #91-0920502
--	--

(b) Address (number and street) Fishermen's Terminal, Build. C-3, Room 103	3 Date April 19, 1977
--	---------------------------------

(c) City, State and ZIP code Seattle, Washington 98119	4 Is this an amended statement <input type="checkbox"/> Yes <input type="checkbox"/> No If "YES" FILL IN ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE
--	---

5 Check one:

(a) This committee has been designated as the principal campaign committee for _____ (Name of Candidate) a candidate for _____ (Federal office sought) in the _____ (Year of election) Election to be held in the State of _____ (State in which election is held)

(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

(b) This committee is supporting only one candidate, and is authorized by _____ (Name of Candidate) to receive contributions and make expenditures with respect to the _____ (General, Primary, Runoff, etc) Election held in _____ (Year of election in State), and will file all reports and statements with the candidate's principal campaign committee, _____ (Full name of principal campaign committee)

(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (FEC FORM 2a)

(c) This committee supports only one candidate _____ (Name of Candidate) but is not an authorized committee.

(d) This committee supports more than one Federal candidate and is not a party committee.

(e) This committee is a _____ (National, State, county, city) committee of the _____ (Democratic, Republican, etc.) Party.

6 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship
Puget Sound Gillnetters Association	Fishermen's Terminal Building C-3, Room 103 Seattle, Washington 98119	Parent Organization

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

Corporation Labor organization Membership organization Trade association Cooperative
 Corporation without capital stock Other (please specify)

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

7790810005

Statement of Organization For Committee

(Page 2)

Commission
N.W.
D.C. 20463

Name of Committee
Puget Sound Gillnetters Political Action Committee

7 Area, Scope and Jurisdiction of Committee:

- (a) Will this committee operate in more than one State? Yes No
- (b) Will it operate on a statewide basis in one State? Yes No
- (c) Will it primarily support candidates seeking State or local office? Yes No
- (d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? Yes No

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

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party
Marvin Durning	110 Cherry St, Suite 304 Seattle, Washington 98104	U.S. Congress Representative	Democrat

(b) List by name, address, office sought, and party affiliation, any candidate(s) for any other public office(s) that this committee is supporting (unless the committee is supporting the entire ticket of a party as indicated in line 9)

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party

9 If this committee is supporting the entire ticket of a party, give name of party ▶

10 Identify by name, address and position, the person in possession of committee books and records:

Full name	Mailing address and ZIP code	Title or position
Terry Proios	Fishermen's Terminal Building C-3, Room 103 Seattle, Wash. 98119	Employed as Secretary by the Puget Sound Gillnetters Assoc.

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

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Statement of Organization Committee

(Page 3)

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

Name of Committee **PUGET SOUND GILNETTERS POLITICAL ACTION COMMITTEE**

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee):

Full name	Mailing address and ZIP code	Title or position
Phil G. Sutherland	439 Pillmore St. Pt. Townsend, WA 98368	Chairman
Peter Mosness	1050 N.W. 177th Place Seattle, WA 98177	Secretary
Ben Cain	959 Queen Street Bellingham, WA 98225	Treasurer
Jay Gould	706 "H" Street Pt. Townsend, WA 98368	Assistant Secretary
Terry Proios	840 N.W. 96th, Seattle 98117	Assistant Treasurer

12 Does this committee plan to stay in existence beyond the current calendar year? Yes No
If "Yes" for how long? 10 years

13 In the event of dissolution, what disposition will be made of residual funds? Will revert back to general funds of parent organization.

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

Name of bank, repository, etc.	Mailing address and ZIP code
Seattle Pacific Office Rainier National Bank	301 West Nickerson Street Seattle, Washington 98119

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 438(a)):

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code

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

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

Bened L. Cain
(Signature of Treasurer)

April 19, 1977
(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. [437g or §441] (see instructions)

For further information contact:

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

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PUDGET SOUND GILLNETTERS ASSOCIATION
Fishermen's Terminal, Bldg. C-2, Boom 103
Seattle, WA 98119

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Statement of Organization

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77 APR 25
FOR EQUAL OPPORTUNITY FISHERIES

Federal Elections Committee
1325 K Street N. W.
Washington, D. C. 20463

FOR EQUAL OPPORTUNITY FISHERIES

Schedule A

July 1976
Federal Election Commission
1325 N Street, N.W.
Washington, D.C. 20543

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(See instructions on back)

Page _____ of _____ for
LINE NUMBER 15A

(Use separate schedule(s) for each
numbered line)

77011211844

Name of Candidate or Committee in full

DURING POP CONGRESS 068748

Full Name, mailing address and ZIP code

Hardis Benediktson,
4609 41st Ave SE
Seattle, WA 98105

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

retired

Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 50.00

3/18/77

50.00

Full Name, mailing address and ZIP code

Alice Franklin Bryant
2813 Broadway E
Seattle

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

retired

Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 200.00

3/18/77

100.00

Full Name, mailing address and ZIP code

Janis K. Collins
400 36th Ave
Seattle, WA 98122

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

speech therapist

Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 50.00

3/18/77

50.00

Full Name, mailing address and ZIP code

Jeff Goltz
Pt 7 Box 644
Olympia, WA 98506

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

attorney

Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 50.00

3/18/77

30.00

Full Name, mailing address and ZIP code

Don Paresanin
2407 A Court Melody Lane
Enumclaw, WA 98022

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

restaurant owner

Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 50.00

3/18/77

50.00

Full Name, mailing address and ZIP code

Puget Sound Gillnetters Association
Fishermen's Terminal Bldg. C-3 Room 103
Seattle, WA 98119

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 500.00

3/18/77

500.00

Subtotal of receipts (the page optional) ▶ \$ 780.00

Total this period (last page this line number only) ▶ \$

Schedule B

July 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see instructions on back)

Page _____ of _____ for

LINE NUMBER 22A

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

Durning for Congress C00075523

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Puget Sound Gilnetters Association Fishermen's Terminal Bldg C-3 Room 103 Seattle, WA 98119	refund of contribution	4/15/77	\$375 500.00
11th District Democrats c/o Bruce McKay, Chairperson 241 Factory N Renton, WA 98055	refund of contribution	4/18/77	\$380 750.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period

Subtotal of expenditures this page (optional) ▶ \$1250.00

Total this period (last page this line number only) ▶ 6

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Schedule A

January 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20461

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See Instructions on back)

Page _____ of _____ for

LINE NUMBER 100

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

MEMBERS FOR CONGRESS 000079523 Deposit of 4/25/77

Full Name, mailing address and ZIP code

Warrens Public Affairs Committee (Leg. Affairs Div. of Wash. State) 4000
1400 Woodmont Drive, Silver Spring, Maryland 20914

Date (month, day, year)

4/25/77

Amount of each receipt this period

100.00

Principal place of business

Occupation

Check if Contributor is self-employed

Aggregate Year to Date ▶ \$ 100.00

Full Name, mailing address and ZIP code

Budget Source Filletters Assoc. Political Action Committee
Fishermen's Terminal Bldg. 6-2, Box 1.3, Seattle, WA 98107

Date (month, day, year)

4/25/77

Amount of each receipt this period

100.00

Principal place of business

Occupation

Check if Contributor is self-employed

Aggregate Year to Date ▶ \$

Full Name, mailing address and ZIP code

Principal place of business

Occupation

Check if Contributor is self-employed

Aggregate Year to Date ▶ \$

Full Name, mailing address and ZIP code

Principal place of business

Occupation

Check if Contributor is self-employed

Aggregate Year to Date ▶ \$

Full Name, mailing address and ZIP code

Principal place of business

Occupation

Check if Contributor is self-employed

Aggregate Year to Date ▶ \$

Full Name, mailing address and ZIP code

Principal place of business

Occupation

Check if Contributor is self-employed

Aggregate Year to Date ▶ \$

Subtotal of receipts this page (optional)

▶ \$ 100.00

Total this period (last page the line number only)

▶ \$

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FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20461

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