



FEDERAL ELECTION COMMISSION

1125 K STREET NW  
WASHINGTON, D.C. 20463

THIS IS THE END OF TÜR # 667

Date Filmed 12/28/78 Camera No. --- 2

Cameraman GPC



FEDERAL ELECTION COMMISSION

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

November 21, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Milan Marsh  
Treasurer  
Ohio State Council of Carpenters  
Political Action Committee  
Post Office Box 68  
Girard, Ohio 44420

Re: MUR 667

Dear Mr. Marsh:

This is to advise you that, on November 15, 1978, the Commission voted to take no further action, and to close its file, in the matter referenced above.

The Commission's earlier finding of reason to believe that the Ohio State Council of Carpenters Political Action Committee violated 2 U.S.C. §441b(b)(3)(A) has not been vacated or rescinded. Rather, the circumstances of this case, as outlined in your recent letter, indicate that further action is not warranted.

I urge you, as Treasurer of a separate segregated fund which makes expenditures both for Federal and non-Federal purposes, to establish separate Federal and non-Federal campaign committees, each with its own segregated banking account. By doing so, the non-Federal account would be free to receive, and to make expenditures from, all those categories of funds as are permitted by local law. In this regard, see Commission Regulation Section 102.6, 11 CFR 102.6.

If you have any questions or need further information, please contact Vincent J. Convery, Jr., the attorney assigned to this matter, at 202-523-4060.

Sincerely,

*VJC*  
*11/20/78*

William C. Oldaker  
General Counsel

70040082715

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NOTE: 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 C  
 Show to whom, date, and address of delivery C  
 RESTRICTED DELIVERY  
 Show to whom and date delivered C  
 RESTRICTED DELIVERY  
 Show to whom, date, and address of delivery \$  
 CONSULT POSTMASTER FOR FEES

2. ARTICLE ADDRESSED TO  
 Maria March, Trust  
 Board of Council, PDC  
 P.O. Box 68, ...

3. ARTICLE DESCRIPTION  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
 439267

(Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE: *Maria March* Address: \_\_\_\_\_ Authorized Agent: \_\_\_\_\_

4. DATE OF DELIVERY: *NOV 28 1978*

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: \_\_\_\_\_ CLERK'S INITIALS: \_\_\_\_\_

Convey mur 667





FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE  
FROM: MARJORIE W. EMMONS *MORE by pc*  
DATE: NOVEMBER 20, 1978  
SUBJECT: MUR 667 - Revised Closing Letter  
Memo dated 11-16-78  
Received in OCS 11-17-78, 1:06

The above-named document was circulated on a 24 hour no-objection basis at 3:30, November 17, 1978.

The Commission Secretary's Office has received no objections to the Revised Closing Letter as of 3:30 this date.

11/23/78

November 17, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 667

Please have the attached Memo and letter distributed  
to the Commission on a 24 hour no-objection basis.

Thank you.

78040082713



FEDERAL ELECTION COMMISSION

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

RECEIVED  
OFFICE OF THE

NOV 17 1978 P 1: 06

November 16, 1978

MEMORANDUM TO: The Commission  
FROM: William C. Oldaker  
SUBJECT: Revised letter, MUR 667

Attached for Commission approval is the revised closing letter to the respondent in MUR 667.

304003:711



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Milan Marsh  
Treasurer  
Ohio State Council of Carpenters  
Political Action Committee  
Post Office Box 68  
Girard, Ohio 44420

Re: MUR 667

Dear Mr. Marsh:

This is to advise you that, on November 15, 1978, the Commission voted to take no further action, and to close its file, in the matter referenced above.

The Commission's earlier finding of reason to believe that the Ohio State Council of Carpenters Political Action Committee violated 2 U.S.C. §441b(b)(3)(A) has not been vacated or rescinded. Rather, the circumstances of this case, as outlined in your recent letter, indicate that further action is not warranted.

I urge you, as Treasurer of a separate segregated fund which makes expenditures both for Federal and non-Federal purposes, to establish separate Federal and non-Federal campaign committees, each with its own segregated banking account. By doing so, the non-Federal account would be free to receive, and to make expenditures from, all those categories of funds as are permitted by local law. In this regard, see Commission Regulation Section 102.6, 11 CFR 102.6.

If you have any questions or need further information, please contact Vincent J. Convery, Jr., the attorney assigned to this matter, at 202-523-4060.

Sincerely,

William C. Oldaker  
General Counsel

790400370

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Ohio State Council of ) MUR 667  
Carpenters Political )  
Action Committee )

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 15, 1978, the Commission, meeting in an Executive Session at which a quorum was present, determined by a vote of 4-0 to take the following actions in MUR 667:

1. Retain the September 13, 1978 finding of reason to believe that the Ohio State Council of Carpenters Political Action Committee violated 2 U.S.C. §441b(b) (3) (A).
2. Take no further action and close the file.
3. Direct the Office of the General Counsel to draft a letter to the respondent informing them of the above actions, and to circulate the draft letter to the Commission for approval.

Commissioners Aikens, Harris, McGarry, and Tieman voted affirmatively for the above actions. Commissioner Springer abstained. Commissioner Thomson was not present at the time of the vote.

Attest:

11/17/78

Date

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary to the Commission

7 8 0 1 0 0 3 2 7 2 1



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *MWE*

DATE: NOVEMBER 2, 1978

SUBJECT: OBJECTION - MUR 667 - General Counsel's  
Report dated 10-19-78  
Signed by General Counsel:  
10-27-78  
Received in OCS: 10-31-78, 1:23

The above-named report was circulated on a 48  
hour vote basis at 4:00, October 31, 1978.

Commissioner Harris submitted an objection at  
2:40, November 2, 1978, thereby placing MUR 667 on the  
Executive Session Agenda for November 15, 1978.

cc: Commissioner Harris

7 2 9 1 0 0 8 2 7 0 2

October 30, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 667

Please have the attached General Counsel's Report on MUR 667 distributed to the Commission on a 48 hour tally basis.

Thank you.

7 9 0 4 0 7 8 2 7 2 3



EVIDENCE:

The information provided by William Sidell, President of the United Brotherhood, is summarized as follows:

By letter dated September 8, 1977, the President of the AFL-CIO requested that Mr. Sidell provide "prompt and generous" support to the Ohio AFL-CIO COPE to assist them in their campaign concerning the Election Day Registration Referendum Issue in the November, 1977, Ohio election.

By requisition dated October 6, 1977, Mr. Sidell requested that a check for \$5,000, payable to the Ohio State Council of Carpenters, be drawn on the General Treasury of the United Brotherhood. The purpose for the requisition was stated as being "Donation for Election Day Voter Registration Law."

By letter dated October 6 the check was forwarded to Milan Marsh in his capacity as Secretary of the Ohio State Council of Carpenters. The letter noted that the check was being sent to "assist in the all-out campaign reference to Election Day Voter Registration Law."

The information provided by Mr. Marsh is summarized as follows:

He received the \$5,000 check from the United Brotherhood and deposited it into the Political Action Fund account.<sup>2/</sup> At approximately the same time, he matched the United

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<sup>2/</sup> Although the United Brotherhood's check was made out to the Ohio State Council of Carpenters, it was deposited to OSCCPAC's account.

73014031725

Brotherhood's contribution and drew a check on the OSCCPAC account for \$10,000, payable to the "Issue 1 Campaign."

DISCUSSION:

Section 441b(b)(3)(A) of the Act provides that it shall be unlawful for a separate segregated fund to make a contribution or expenditure by utilizing money or anything of value secured by dues, fees or other monies required as a condition of membership in a labor organization.

OSCCPAC registered as a Federal committee on April 19, 1972. Reports filed by OSCCPAC indicate that in 1977 it made no Federal contributions/expenditures, and that in 1978 it has made both Federal and non-Federal contributions/expenditures. Reports also indicate that OSCCPAC maintains a single account.

In the past, there apparently has been no question as to whether the funds used to make the Federal expenditures had originated with an "allowable" source. (According to Mr. Marsh, money deposited to the OSCCPAC account came from "independent raffle sales"). As of October 27, 1977, the date on which the United Brotherhood's contribution was deposited to OSCCPAC's account, that account showed a balance of \$19,911.78. As soon as the United Brotherhood's check was deposited to the OSCCPAC account, it became commingled with the "allowable" funds already on deposit. The funds used by OSCCPAC to make a \$450 contribution to the Citizens for Tony Hall on February 27, 1978, and a \$2,000 contribution to the Howard Metzenbaum Post-Election Committee on March 20, 1978, were thus tainted with the United Brotherhood's money.

With the following language, the Court of Appeals has indicated that union money cannot be so used even indirectly in a Federal election:

"If 'voluntary' and 'involuntary' funds are commingled and then a portion is expended for political purposes, it is impossible to tell whether the 'voluntary' or the 'involuntary' money is being expended. One can only assume that a proportionate share of each is being spent. Thus Congress, in prohibiting expenditures from a union general treasury, simply acted on the principle that expenditures from commingled funds will be presumed to consist of proportionate shares of the different kinds of money. ... [The] 'involuntary' portion may be presumed to be a part of each expenditure from the commingled funds."

U.S. v. Boyle, 482 F.2d 755 at 761, n. 16.

Mr. Marsh argues that, because the United Brotherhood's money was requested for a specific [non-Federal] purpose, it did not "taint" the voluntary money already on deposit in OSCCPAC's account. We do not believe that his argument can alter the conclusion we have reached, for, whatever the intended purpose of the United Brotherhood contribution, the fact remains that union money was deposited to OSCCPAC's account. Furthermore, the sequence of the transactions indicates that there is no justification for saying that this particular \$5,000 went directly to the local issue.<sup>3/</sup> More correctly, the United Brotherhood

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<sup>3/</sup> OSCCPAC's \$10,000 check to the Issue 1 Campaign was dated October 20, 1977. (This date is consistent with that reflected on the appropriate report of receipts and expenditures). The report of receipts and expenditures further indicates that OSCCPAC received the United Brotherhood's contribution on October 25. Their deposit slip shows that the money was deposited to the OSCCPAC account on October 27.

contribution was used to replenish OSCCPAC funds already expended on the local issue.

We believe that this sequence of events compels all the more the conclusion that OSCCPAC's 1978 Federal contributions were made with funds which had been "tainted" with the money of the United Brotherhood.

CONCLUSION:

There is sufficient evidence upon which to base a finding of reasonable cause to believe that OSCCPAC violated Section 441b(b)(3)(A) of the Act.

Along with this finding, we will propose as terms of conciliation, that OSCCPAC pay a civil penalty of \$1,000; that OSCCPAC return to the Ohio State Council of Carpenters an amount equal to the United Brotherhood's contribution; and that OSCCPAC "reconstitute" itself exclusively as a Federal committee, pursuant to Commission Regulation 102.6(a)(2)(i).

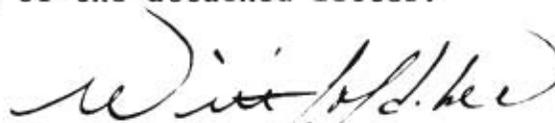
RECOMMENDATION:

1. Find reasonable cause to believe that the Ohio State Council of Carpenters Political Action Committee violated Section 441b(b)(3)(A) of the Act.

2. Authorize the Office of General Counsel to seek conciliation of the matter in the terms of the attached proposed conciliation agreement.

3. Authorize the sending of the attached letter.

10/17/78  
Date

  
\_\_\_\_\_  
William C. Oldaker  
General Counsel

ATTACHMENTS:

1. Ltr from Milan Marsh, dtd 9/27/78, w/ attachments
2. Ltr from William Sidell, dtd 9/20/78, w/ attachments
3. Proposed letter to respondent
4. Proposed conciliation agreement

10-17-78

*Convery*

FRANK J. McNAMARA  
President  
MILAN MARSH  
Executive Secretary-Treasurer

124 Liberty Street  
Youngstown,  
Ohio 44505  
Phone 216 759-1400  
216 759-1461

# OHIO STATE COUNCIL

— OF THE —

*United Brotherhood of Carpenters  
and Joiners of America*



September 27, 1978

Mr. Vincent J. Convery, Jr.  
Commission Attorney  
Federal Election Commission  
1325 K St. N. W.  
Washington, D. C. 20403

Dear Sir,

This communication is a follow up of our phone conversation concerning the communications received by Frank McNamara and myself from William C. Oldaker requesting information on a political contribution received from our International Union earmarked for a voter registration Issue # 1 on the ballot in Ohio November 8, 1977.

I requested and received a donation of \$5,000.00 from the International Union toward this effort. I deposited the \$5,000.00 into our Political Action Fund and matched this amount and issued a check for \$10,000.00 to the Issue # 1 Committee. This was for the purpose of educating members of the labor movement as to benefits of having election day registration.

The money we deposit into our P.A.C. Account is from independent raffle sales. We do not mingle it with any other union funds. In the year of 1977 the Ohio Carpenters P.A.C. Committee did not contribute any money to any Federal Candidate.

When the check was received from our International we deposited it into our account approximately the time we issued a check for the Issue # 1 Campaign, excluding weekends.

I feel we did not deviate from our responsibility of reporting properly or in any devious fashion spend money illegally. Again, we received a pledge, matched it and contributed to a Issue # 1 Committee. Also, no Federal Candidate received money from the Committee that year.

I hope this letter will correct any misunderstandings on this matter.

Sincerely,

*Milan Marsh*

Milan Marsh  
Treas.

Attachment 1

MM:nm  
Enclosures: (2)

7 9 3 1 0 7 3 1 7 2 9





WILLIAM SIDELL  
GENERAL PRESIDENT



4996  
UNITED BROTHERHOOD OF CARPENTERS  
AND JOINERS OF AMERICA  
101 CONSTITUTION AVE., N. W.  
WASHINGTON, D. C. 20001

September 20, 1978 54

Convery  
2-01

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

806453

Re: MUR 667

Dear Mr. Oldaker:

The following answers are provided to your letter of September 18, 1978 addressed to the General Office of the United Brotherhood of Carpenters and Joiners of America:

- a) Enclosed please find letter of September 8, 1977 from the AFL-CIO to the United Brotherhood, requesting participation by way of contribution in a legislative matter described in the letter.
- b) September 8, 1977.
- c) Opposition to a certain legislative proposal as indicated in the letter of September 8, 1977.
- d) Not applicable.
- e) Requisition for disbursement enclosed herewith shows payment October 7, 1977 and cover letter to Ohio State Council of Carpenters dated October 6, 1977. We have searched our records and have no other date to report bearing on your question lettered (e).
- f) The check was forwarded to Milan Marsh, Secretary, Ohio State Council of Carpenters.
- g) We have no record of any other transaction by the United Brotherhood to the Ohio State Council of Carpenters or to the Ohio State Council of Carpenters Committee in October, 1977.

Attachment 2

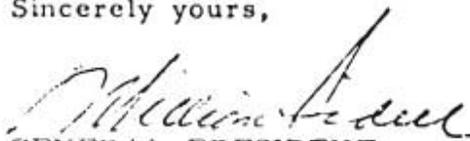
William C. Oldaker, General Counsel - 2 -

September 20, 1978

We have enclosed in accord with your request, a copy of check #22260 front and back; and copies of all other documents bearing on this matter that we have located in the United Brotherhood file.

When the AFL-CIO requests contributions of regional applicability, it has been United Brotherhood policy, if contribution is to be made, to contribute the funds to the United Brotherhood affiliate in the locality rather than to the division of the AFL-CIO in the region.

Sincerely yours,

  
GENERAL PRESIDENT

WS/elp  
enc.

# AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS

## EXECUTIVE COUNCIL

**GEORGE MEANY**

PRESIDENT

PAUL HALL  
MAX GREENBERG  
MATTHEW LUDMAN  
THOMAS W. CLARSON  
JERRY NUBB  
GEORGE HARDY  
WILLIAM SIDELL  
ALBERT SHANKER  
FRANCIS S. PILBEE  
MAL C. DAVIS  
CHARLES H. PILLARD

**LANE KIRKLAND**

SECRETARY-TREASURER

F. W. ABEL  
JOHN M. LYONS  
C. J. DENNIS  
FREDERICK G. NEAL  
S. FRANK BARTLEY  
AL H. CHESLER  
MURRAY H. FINLEY  
SUI STEIN  
GLENN F. WATTS  
EDWARD T. HANLEY  
WILLIAM M. MCCLENNAN

PAUL JENNINGS  
A. J. CASPIRON  
PIER ROMPARITO  
FLOYD E. SMITH  
JAMES T. HOUSEWRIGHT  
MARTIN J. WARD  
JOSEPH P. TUNELLE  
E. L. BELLISSIMO  
SOL C. SHANKIN  
ANGELO FOSCO  
J. C. TURNER



815 SIXTEENTH STREET, N.W.  
WASHINGTON, D.C. 20006

(202) 637-5000

September 8, 1977

Mr. William Sidell, President  
United Brotherhood of Carpenters  
and Joiners of America  
101 Constitution Avenue, N.W.  
Washington, D.C. 20001

RECEIVED

SEP 9 1977

PRESIDENT'S OFFICE

Dear Sir and Brother:

A referendum promoted by right-wingers and the Ohio and National Republican Parties is scheduled November 8 calling for repeal of Ohio's newly-enacted election day registration law.

The Ohio AFL-CIO is spearheading the campaign against repeal, and has joined in coalition with the UAW and the Ohio Democratic Party. The coalition also expects to include the NAACP, Council of Churches, National Rural Electric Cooperatives, Farmers Union, League of Women Voters and other "good-government" groups.

A budget of \$800,000 has been established for this fight.

Your help is urgently needed. Opponents of election day registration will spend millions. We can not match them dollar for dollar, but a generous contribution from your international union will permit the labor movement to wage the full-scale campaign necessary to defeat the proposal.

In addition, it will be very helpful for you to contact your Ohio locals urging their all-out support of Ohio COPE's campaign.

I consider this the most significant political struggle of 1977. We must win this fight or election day registration will be dead in Ohio. Opponents will then more than likely seek repeal in the five other states where it is on the books.

Please send your check, made out to Ohio AFL-CIO COPE, either to Milan Marsh, President, or Warren Smith, Secretary-Treasurer, Ohio AFL-CIO, 271 East State Street, Columbus, Ohio 43215.

I will appreciate your prompt and generous support.

Sincerely and fraternally,

President

Ohio State Council 10/6/77

(2)

October 6, 1977

Mr. Milan Marsh, Secretary  
Ohio State Council of Carpenters  
124 Liberty Street  
Youngstown, Ohio 44505

Dear Sir and Brother:

Enclosed find Brotherhood check in the amount of  
\$5,000.00, to assist in the all-out campaign reference to  
Election Day Voter Registration Law.

Fraternally yours,

GENERAL PRESIDENT

WS:sd  
Enclosure  
Ck No 22,260

*See AFL-CIO - 1/2/77*

(2)

REQUISITION FOR DISBURSEMENT

Date: October 6, 1977

TO: GENERAL TREASURER  
FROM: William Sidell  
PAYABLE TO: Ohio State Council of Carpenters  
AMOUNT: \$5,000.00  
PURPOSE: Donation for Election Day Voter  
Registration Law  
REMARKS:

*ck 22,260*

Recommended by

*William Sidell*  
Approved for Disbursement

WS:sd

Date: October 6, 1977



(2)



ATM BATH, 4300 ASB 937  
R.B. BALTIMORE 761  
630-6027-8

CI

0520-5027-8

56-269  
THE UNION SAVINGS & TRUST CO.  
LIBRARY OFFICE  
YOUNGSTOWN, OHIO  
OCT 27 1977

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CO.  
WINGS  
PEG.

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FOR DEPOSIT ONLY  
OHIO STATE COUNCIL OF  
CARPENTERS OPTICAL  
ACTION ACCT

6320

# REQUISITION FOR DISBURSEMENT

Date: October 6, 1977

TO: GENERAL TREASURER

FROM: William Sidell

PAYABLE TO: Ohio State Council of Carpenters

AMOUNT: \$5,000.00

PURPOSE: Donation for Election Day Voter  
Registration Law

REMARKS:

PAID  
OCT 7 1977  
CHECK No. \_\_\_\_\_

Recommended by

41220

*William Sidell*  
Approved for Disbursement

WS:sd

Date: October 6, 1977

(2)



April 20, 1978

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

Dear Mr Potter:

This is in response to your correspondence and inquiry of April 14, 1978 regarding an apparent discrepancy in our not reporting out a transfer of \$5,120.00 to the Ohio State Council of Carpenters Political Action Committee.

A very careful check of all of our records for that period, including cancelled checks, reveals no such transaction took place. Our committee, quite simply, never sent a check for the amount in question to our Ohio State Council.

However, a further check on our part of the General Treasury financial records (not Carpenters Legislative Improvement Committee records) of the United Brotherhood reveals what we believe to be the source of confusion for this problem.

As you can see from the enclosed attachments, on October 7, 1977 a check drawn on General Treasury monies (not CLIC) in the amount of \$5,000.00 was sent to the Ohio State Council of Carpenters.

This money was used for voter education and get out the vote purposes. We have been informed by the Ohio State Council that it was definitely not used by them in support of any Federal candidates.

(2)

Furthermore, we are sending along for your information a copy of correspondence we sent out on March 3, 1978 to all of our Local Unions, State and District Councils alerting them to what they, as affiliates of our organization, can and cannot do in this election year.

In summary, the Carpenters Legislative Improvement Committee made no such transfer to our Ohio State Council, and we feel confident that an amendment by them to their report will lay this matter to rest.

Sincerely yours,

Charles E Nichols  
General Treasurer

CEN/pa  
enclosure

cc: Marybeth Sarrant, F.E.C.  
Delan March, Ohio State Co.



INTERNATIONAL BROTHERHOOD OF  
CARPENTERS AND JOINERS  
OF AMERICA · WASHINGTON, D.C.



15-55  
540

DATE

OCT 7 '77

CHECK NO.

22,260

PAY TO THE ORDER OF

OHIO STATE COUNCIL OF CARPENTERS

AMOUNT \$

\$0,005,000.00

5,000.00

NATIONAL SAVINGS TRUST COMPANY

WASHINGTON, D.C.

⑆0003514⑆ ⑆0540⑆0052⑆ 484⑆080 1⑆

⑆0000500000⑆

*Ed. J. E. ...*  
Gen'l Treas. Gen'l Secy

# REQUISITION FOR DISBURSEMENT

Date: October 6, 1977

TO: GENERAL TREASURER

FROM: William Sidell

PAYABLE TO: Ohio State Council of Carpenters

AMOUNT: \$5,000.00

PURPOSE: Donation for Election Day Voter  
Registration Law

REMARKS:

30400317

PAID  
OCT 7 1977  
CHECK No. \_\_\_\_\_

Recommended by

41220

*William Sidell*  
Approved for Disbursement

WS:sd

Date: October 6, 1977

(2)





CHARLES E. NICHOLS  
 DIRECTOR AND TREASURER  
 101 CONSTITUTION AVE., WASHINGTON, D. C. 20001  
 PHONE: 202/546-6206

# Carpenters' Legislative Improvement Committee

March 3, 1978

## IMPORTANT ELECTION YEAR NOTICE

TO: ALL U.S. LOCAL UNIONS, STATE AND DISTRICT COUNCILS

The Federal Election Campaign Act of 1974 made certain changes in federal law that all Brotherhood Local Unions, State and District Councils need to be reminded of as we approach the November Congressional Elections:

1. If any Brotherhood Local Union, State or District Council has established a separate, voluntary, political fund, other than CLIC, that makes financial contributions of these voluntary monies to any federal candidates (President, Senator, Congressman), it is your obligation, not ours, to register that committee with the Federal Election Commission. Furthermore, it is your obligation to file on time the necessary reports of contributions made.
2. However, under the 1974 law, while it is your responsibility to register any political committee other than CLIC and to file the necessary reports, the law says that for purposes of contribution totals that the Brotherhood is considered one entity. AND WE AT THE NATIONAL LEVEL ARE RESPONSIBLE THAT CAMPAIGN CONTRIBUTION LIMITATIONS ARE NOT EXCEEDED BY ANY AFFILIATE OF THE BROTHERHOOD.

SUMMARY: The law says that no committee may contribute more than \$5,000 in a primary election and another \$5,000 in a subsequent general election to any federal candidate (President, Senator, Congressman). Furthermore, all committees must register with the F.E.C. and, of course, the contributing of treasury monies is illegal.

CONCLUSION-INSTRUCTIONS: Since we at CLIC are held responsible for the entire Brotherhood that the aforementioned monetary limitations are not exceeded, it is essential that all other existing committees report to us both the amount of any contribution and the name and office sought of the candidate.

If this situation applies to you, please follow this procedure.

Fraternally yours,

Charles E. Nichols  
 General Treasurer and  
 Director of Legislation

(2)

CEN/im  
 open #2/acl-cio



FEDERAL ELECTION COMMISSION

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

April 14, 1978

Mr. Charles E. Nichols, Treasurer  
CARPENTERS LEGISLATIVE IMPROVEMENT COMMITTEE  
101 Constitution Avenue, N.W.  
Washington, D.C. 20001

Dear Mr. Nichols,

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 January 31 Year End  
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 Beverly Brown (800-424-9530) our Reports Analyst assigned to you.

Sincerely,

Orlando B. Potter  
Staff Director

Attachment

12

(2)

5-101

QUEST FOR ADDITIONAL INFORMATION FOR THE January 31 Year End THROUGH 12/31/77 REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 10/1/77 THROUGH 12/31/77 RESUANT 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).

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

Coverage Dates — omitted or — incorrect

Signature — omitted or — incorrect

Summary Page Line(s) — Column(s) — Totals — omitted or — incorrect

Detailed Summary (Page 2) Line(s) — Column(s) — Totals — omitted or — incorrect

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 —

X Other: In their Thirty Day Report of receipts and expenditures the Ohio State Council of Carpenters discloses a transfer in of \$5,120 from your committee on 10/25/77. Your committee does not report the transfer out to the Ohio State Council of Carpenters Political Action Committee. Please explain the discrepancy noted here.

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) 424-9500 or 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 NE, 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.



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Milan Marsh  
Treasurer  
Ohio State Council of Carpenters  
Political Action Committee  
P.O. Box 68  
Girard, Ohio 44420

Re: MUR 667

Dear Mr. Marsh:

This is to advise you that, on 1978, the Commission found reasonable cause to believe that the Ohio State Council of Carpenters Political Action Committee (OSCCPAC) violated Section 441b(b)(3)(A) of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §431 et seq., (the Act).

That Section provides that it shall be unlawful for any separate segregated fund, such as OSCCPAC, to make contributions or expenditures by utilizing money or anything of value secured by dues, fees, or other monies required as a condition of membership in a labor organization.

The Commission's finding is based on evidence that OSCCPAC made Federal contributions on February 27 and March 20, 1978, by using funds which had originated, in part, in the general treasury of the United Brotherhood of Carpenters and Joiners of America, AFL-CIO.

The Commission considered evidence which indicated that, on October 27, 1977, a check for \$5,000, drawn on the general treasury of the United Brotherhood, and payable to the Ohio State Council of Carpenters, was deposited to OSCCPAC's account. "Union" monies thus were commingled with OSCCPAC monies already on deposit. Having thus been "tainted" with "Union" money, OSCCPAC's account was used to support Federal candidates as noted above.

73040080747

Having determined that there is reasonable cause to believe that a violation of the Act has occurred, the Commission now must endeavor for a period of not less than thirty days to correct such violation by informal means of conference, conciliation and persuasion, and must attempt to enter into a conciliation agreement. If we are unable to reach an agreement during the thirty day period, 2 U.S.C. §437g(a)(5)(B) provides that the Commission, upon a finding of probable cause to believe that a violation has occurred, may institute a law suit.

Our proposed conciliation agreement is attached. That agreement, in effect, calls for OSCCPAC to establish separate Federal and non-Federal committees (see Commission Regulation 102.6(a)(2)(i), 11 CFR 102.6(a)(2)(i)); for OSCCPAC to return to the Ohio State Council of Carpenters an amount equal to the \$5,000 which was payable to that organization by benefit of the United Brotherhood's check; and for OSCCPAC to pay to the Treasury of the United States a civil penalty in the amount \$1,000.

If you accept the terms of this proposal, please sign a copy of the agreement and return it to this office. You will note that, beginning with the day on which OSCCPAC is formally notified that the Commission has accepted the conciliation agreement, OSCCPAC will have thirty days in which to comply with the requirements of the agreement.

If you have any questions, please contact Vincent J. Convery, Jr., the Commission attorney assigned to this matter, at 202-523-4060.

Sincerely,

William C. Oldaker  
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION  
October 19, 1978

In the Matter of )  
 )  
Ohio State Council of ) MUR 667  
Carpenters Political )  
Action Committee )

CONCILIATION AGREEMENT

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This matter was instituted as a result of information ascertained by the Federal Election Commission in the course of carrying out its supervisory responsibilities. The Commission conducted an investigation and found reasonable cause to believe that the respondent, the Ohio State Council of Carpenters Political Action Committee (hereinafter, "OSCCPAC"), violated Section 441b(b)(3)(A) of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §431 et seq., (hereinafter, "the Act").

Now, therefore, the Federal Election Commission and the respondent OSCCPAC, having entered into conciliation pursuant to 2 U.S.C §437g(a)(5)(A), do agree upon the following:

1. That the Federal Election Commission has jurisdiction over the respondent OSCCPAC and over the subject matter of this proceeding.
2. That the respondent OSCCPAC has had reasonable opportunity to demonstrate that no action should be taken in this matter.

3. That the pertinent facts and law in this matter are as follows:

a. On or about October 7, 1977, the United Brotherhood of Carpenters and Joiners of America, AFL-CIO, (hereinafter "United Brotherhood"), issued a check in the amount of \$5,000, payable to the Ohio State Council of Carpenters. The stated purpose of the check was "to assist in the all-out campaign reference to Election Day Voter Registration Law" (the "Issue 1 Campaign"), a referendum issue in the November 8, 1977, Ohio election.

b. Respondent OSCCPAC is the separate segregated fund of the Ohio State Council of the United Brotherhood of Carpenters and Joiners of America.

c. By check dated October 20, 1977, the respondent OSCCPAC made a contribution of \$10,000 to the Issue 1 Campaign.

d. On or about October 27, 1977, the United Brotherhood check in the amount \$5,000, payable to the Ohio State Council of Carpenters, was deposited to the respondent OSCCPAC's checking account.

e. In 1978, the respondent OSCCPAC made contributions to committees which support Federal candidates.

f. Under 2 U.S.C. §441b(b)(3)(A) it is unlawful for a separate segregated fund, such as OSCCPAC, to make a contribution or expenditure in connection with a Federal election by utilizing money or anything of value secured by dues, fees or other monies required as a condition of membership in a labor organization.

g. As a result of the deposit of the United Brotherhood's check into OSCCPAC's account, as described in paragraph 3d above, OSCCPAC's 1978 contributions to committees supporting Federal candidates were made, in part, with funds which originated in the general treasury of the United Brotherhood of Carpenters and Joiners of America. Such funds had been secured by dues, fees or other monies required as a condition of membership in the United Brotherhood.

WHEREFORE, respondent Ohio State Council of Carpenters Political Action Committee agrees:

4. That its contributions in 1978 to committees supporting Federal candidates were made from an account into which had been deposited funds which originated in the general treasury of the United Brotherhood of Carpenters and Joiners of America.
5. That such contributions were, therefore, made in violation of 2 U.S.C. §441b(b)(3)(A).
6. That it will establish itself, pursuant to 11 CFR 102.6(2)(i), as a separate Federal campaign committee.
7. That it will transfer five thousand (\$5,000) dollars to the Ohio State Council of Carpenters.
8. That it will pay to the Treasury of the United States a civil penalty in the amount one thousand (\$1,000) dollars.

The Federal Election Commission and the Ohio State Council of Carpenters Political Action Committee enter into this agreement under the following GENERAL CONDITIONS:

- 9. The Commission, upon request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein, or on its own motion, may review compliance with this agreement. If the Commission determines 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.
- 10. This agreement shall become effective as of the moment that both parties have executed same and the Federal Election Commission has approved the entire agreement.
- 11. Beginning with the date it is formally notified that the Commission has approved the agreement, the respondent shall have thirty days to comply with all requirements contained therein.

For the Respondent Ohio State Council of Carpenters Political Action Committee

\_\_\_\_\_  
Date

\_\_\_\_\_  
Milan Marsh  
Treasurer

For the Federal Election Commission

\_\_\_\_\_  
Date

\_\_\_\_\_  
William C. Oldaker  
General Counsel

FRANK J. McNAMARA  
President  
MILAN MARSH  
Executive Secretary-Treasurer

# OHIO STATE COUNCIL

— OF THE —

*United Brotherhood of Carpenters  
and Joiners of America*



124 Liberty Street  
Youngstown,  
Ohio 44505  
Phone 216 759-1400  
216 759-1461

September 27, 1978

Mr. Vincent J. Convery, Jr.  
Commission Attorney  
Federal Election Commission  
1325 K St. N. W.  
Washington, D. C. 20403

Dear Sir,

This communication is a follow up of our phone conversation concerning the communications received by Frank McNamara and myself from William C. Oldaker requesting information on a political contribution received from our International Union earmarked for a voter registration Issue # 1 on the ballot in Ohio November 8, 1977.

I requested and received a donation of \$5,000.00 from the International Union toward this effort. I deposited the \$5,000.00 into our Political Action Fund and matched this amount and issued a check for \$10,000.00 to the Issue # 1 Committee. This was for the purpose of educating members of the labor movement as to benefits of having election day registration.

The money we deposit into our P.A.C. Account is from independent raffle sales. We do not mingle it with any other union funds. In the year of 1977 the Ohio Carpenters P.A.C. Committee did not contribute any money to any Federal Candidate.

When the check was received from our International we deposited it into our account approximately the time we issued a check for the Issue # 1 Campaign, excluding weekends.

I feel we did not deviate from our responsibility of reporting properly or in any devious fashion spend money illegally. Again, we received a pledge, matched it and contributed to a Issue # 1 Committee. Also, no Federal Candidate received money from the Committee that year.

I hope this letter will correct any misunderstandings on this matter.

Sincerely,

Milan Marsh  
Treas.

MM: mm  
Enclosures: (2)



DEPOSITED WITH

The Union Savings & Trust Company

Washington



ALL ITEMS ARE RECEIVED SUBJECT TO THE FOLLOWING CONDITIONS

By receiving this receipt, the depositor certifies that the amount of the deposit is correct and that the funds are his own or those of which he is the legal owner. He also certifies that the funds are not the proceeds of any illegal transaction and that they are not the proceeds of any transaction in violation of any law, statute, or regulation. This receipt is not valid unless it is signed by the depositor or his authorized agent. It is not valid if it is signed by a person who is not the depositor or his authorized agent. It is not valid if it is signed by a person who is not the depositor or his authorized agent. It is not valid if it is signed by a person who is not the depositor or his authorized agent.

THIS IS YOUR RECEIPT

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

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ALWAYS OBTAIN AN OFFICIAL PRINTED RECEIPT WHEN MAKING A DEPOSIT

*Deposit Slip*

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OHIO STATE COUNCIL  
OF CARPENTERS



MILAN MARSH

Executive Secretary-Treasurer

124 Liberty Street

Youngstown, Ohio 44505



**CERTIFIED**

No. 683743

**MAIL**

RETURN RECEIPT REQUESTED

Mr. Vincent J. Convery, Jr.  
Commission Attorney  
Federal Election Commission  
1325 K St. N. W.  
Washington, D. C. 20403

PA 12:43

WILLIAM SIDELL  
GENERAL PRESIDENT



RECEIVED  
UNITED BROTHERHOOD OF CARPENTERS  
AND JOINERS OF AMERICA  
101 CONSTITUTION AVE., N. W.  
WASHINGTON, D. C. 20001

SEP 20 1978 54

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

806453

Re: MUR 667

Dear Mr. Oldaker:

The following answers are provided to your letter of September 18, 1978 addressed to the General Office of the United Brotherhood of Carpenters and Joiners of America:

- a) Enclosed please find letter of September 8, 1977 from the AFL-CIO to the United Brotherhood, requesting participation by way of contribution in a legislative matter described in the letter.
- b) September 8, 1977.
- c) Opposition to a certain legislative proposal as indicated in the letter of September 8, 1977.
- d) Not applicable.
- e) Requisition for disbursement enclosed herewith shows payment October 7, 1977 and cover letter to Ohio State Council of Carpenters dated October 6, 1977. We have searched our records and have no other date to report bearing on your question lettered (e).
- f) The check was forwarded to Milan Marsh, Secretary, Ohio State Council of Carpenters.
- g) We have no record of any other transaction by the United Brotherhood to the Ohio State Council of Carpenters or to the Ohio State Council of Carpenters Committee in October, 1977.

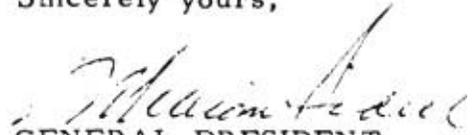
William C. Oldaker, General Counsel - 2 -

September 20, 1978

We have enclosed in accord with your request, a copy of check #22260 front and back; and copies of all other documents bearing on this matter that we have located in the United Brotherhood file.

When the AFL-CIO requests contributions of regional applicability, it has been United Brotherhood policy, if contribution is to be made, to contribute the funds to the United Brotherhood affiliate in the locality rather than to the division of the AFL-CIO in the region.

Sincerely yours,

  
GENERAL PRESIDENT

WS/elp  
enc.

09081010733

OFF. BSA

# AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS

**EXECUTIVE COUNCIL**  
**GEORGE MEANY**      **LANE KIRKLAND**  
PRESIDENT      SECRETARY-TREASURER

PAUL HALL  
MAX GREENBERG  
MATTHEW LUTINAR  
THOMAS W. GILASON  
JERRY WURM  
GEORGE HARDY  
WILLIAM SCHELL  
ALBERT SHANNON  
FRANCIS S. FOLEY  
RAL C. DAVIS  
CHARLES H. PILLARD

I. W. ABEL  
JOHN W. LYONS  
C. L. DENNIS  
FREDERICK O'NEAL  
S. FRANK BATTERY  
AL W. CHASSER  
WILLIAM W. FINLEY  
SOL SIEGAL  
GLENN E. WATTS  
EDWARD F. HANLEY  
WILLIAM H. McLENNAN

PAUL JENNINGS  
A. F. CRISPINSON  
PIETRO RUMMARITO  
FLOID E. SMITH  
JAMES S. MCINTYRE  
MARTIN J. WARD  
JOSEPH P. TUNELLE  
C. L. BELLINGS  
SOL C. CHAMIN  
ANGELO JOSCO  
J. C. TURNER



815 SIXTEENTH STREET, N.W.  
WASHINGTON, D.C. 20006  
(202) 637-8000

September 8, 1977

Mr. William Sidell, President  
United Brotherhood of Carpenters  
and Joiners of America  
101 Constitution Avenue, N.W.  
Washington, D.C. 20001

RECEIVED

SEP 9 1977

PRESIDENT'S OFFICE

Dear Sir and Brother:

A referendum promoted by right-wingers and the Ohio and National Republican Parties is scheduled November 8 calling for repeal of Ohio's newly-enacted election day registration law.

The Ohio AFL-CIO is spearheading the campaign against repeal, and has joined in coalition with the UAW and the Ohio Democratic Party. The coalition also expects to include the NAACP, Council of Churches, National Rural Electric Cooperatives, Farmers Union, League of Women Voters and other "good-government" groups.

A budget of \$800,000 has been established for this fight.

Your help is urgently needed. Opponents of election day registration will spend millions. We can not match them dollar for dollar, but a generous contribution from your international union will permit the labor movement to wage the full-scale campaign necessary to defeat the proposal.

In addition, it will be very helpful for you to contact your Ohio locals urging their all-out support of Ohio COPE's campaign.

I consider this the most significant political struggle of 1977. We must win this fight or election day registration will be dead in Ohio. Opponents will then more than likely seek repeal in the five other states where it is on the books.

Please send your check, made out to Ohio AFL-CIO COPE, either to Milan Marsh, President, or Warren Smith, Secretary-Treasurer, Ohio AFL-CIO, 271 East State Street, Columbus, Ohio 43215.

I will appreciate your prompt and generous support.

Sincerely and fraternally,

President

Ohio State Council 10/6/77

October 6, 1977

Mr. Milan Marsh, Secretary  
Ohio State Council of Carpenters  
124 Liberty Street  
Youngstown, Ohio 44505

Dear Sir and Brother:

Enclosed find Brotherhood check in the amount of  
\$5,000.00, to assist in the all-out campaign reference to  
Election Day Voter Registration Law.

Fraternally yours,

GENERAL PRESIDENT

WS:sd  
Enclosure  
Ck No 22,260

See AFL-CIO - 9/8/77

73040081751

# REQUISITION FOR DISBURSEMENT

Date: October 6, 1977

TO: GENERAL TREASURER  
FROM: William Sidell  
PAYABLE TO: Ohio State Council of Carpenters  
AMOUNT: \$5,000.00  
PURPOSE: Donation for Election Day Voter  
Registration Law  
REMARKS:

00011131751

*ck 22,260*

\_\_\_\_\_  
Recommended by

*William Sidell*  
Approved for Disbursement

WS:sd

Date: October 6, 1977





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FOR DEPOSIT ONLY  
OHIO STATE COUNCIL OF  
CARPENTERS POLITICAL  
ACTION ACCT

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THE UNION SAVINGS & TRUST CO.  
LIBERTY OFFICE  
YOUNGSTOWN, OHIO

1977

AT BALTIMORE, MD. 21201  
R.B. BALTIMORE  
6520-0027-8

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# REQUISITION FOR DISBURSEMENT

Date: October 6, 1977

TO: GENERAL TREASURER

FROM: William Sidell

PAYABLE TO: Ohio State Council of Carpenters

AMOUNT: \$5,000.00

PURPOSE: Donation for Election Day Voter  
Registration Law

REMARKS:

79010081764

PAID  
OCT 7 1977  
CHECK No. \_\_\_\_\_

Recommended by

41220

*William Sidell*  
Approved for Disbursement

WS:sd

Date: October 6, 1977



April 20, 1978

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

Dear Mr Potter:

This is in response to your correspondence and inquiry of April 14, 1978 regarding an apparent discrepancy in our not reporting out a transfer of \$5,120.00 to the Ohio State Council of Carpenters Political Action Committee.

A very careful check of all of our records for that period, including cancelled checks, reveals no such transaction took place. Our committee, quite simply, never sent a check for the amount in question to our Ohio State Council.

However, a further check on our part of the General Treasury financial records (not Carpenters Legislative Improvement Committee records) of the United Brotherhood reveals what we believe to be the source of confusion for this problem.

As you can see from the enclosed attachments, on October 7, 1977 a check drawn on General Treasury monies (not CLIC) in the amount of \$5,000.00 was sent to the Ohio State Council of Carpenters.

This money was used for voter education and get out the vote purposes. We have been informed by the Ohio State Council that it was definitely not used by them in support of any Federal candidates.

Furthermore, we are sending along for your information a copy of correspondence we sent out on March 3, 1978 to all of our Local Unions, State and District Councils alerting them to what they, as affiliates of our organization, can and cannot do in this election year.

In summary, the Carpenters Legislative Improvement Committee made no such transfer to our Ohio State Council, and we feel confident that an amendment by them to their report will lay this matter to rest.

Sincerely yours,

Charles E Nichols  
General Treasurer

CEN/pa  
enclosure

cc: Marybeth Jarrant, F.E.C.  
Nelson Marsh, Ohio State Co.

73040082755



UNITED BROTHERHOOD OF  
**CARPENTERS AND JOINERS**  
 OF AMERICA. WASHINGTON, D.C.



15-55  
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DATE	CHECK NO.	PAY TO THE ORDER OF	AMOUNT
OCT 7 '77	22,260	OHIO STATE COUNCIL OF CARPENTERS	5,000.00

\$0,005,000.00

NATIONAL SAVINGS TRUST COMPANY  
 WASHINGTON, D.C.

*Robert E. Smith*  
 Gen'l Treas.  
*William J. ...*  
 Gen'l Pres. - Gen'l Sec'y

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19780104

# REQUISITION FOR DISBURSEMENT

Date: October 6, 1977

TO: GENERAL TREASURER

FROM: William Sidell

PAYABLE TO: Ohio State Council of Carpenters

AMOUNT: \$5,000.00

PURPOSE: Donation for Election Day Voter  
Registration Law

REMARKS:

7 3 7 1 0 0 8 1 7 6 3

PAID  
OCT 7 1977  
CHECK No. \_\_\_\_\_

Recommended by

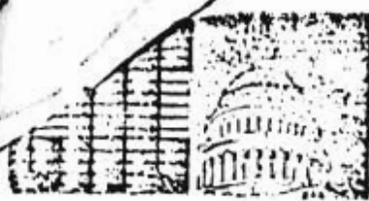
41220

*William Sidell*  
Approved for Disbursement

WS:sd

Date: October 6, 1977





CHARLES E. NICHOLS  
DIRECTOR AND TREASURER  
101 CONSTITUTION AVE., WASHINGTON, D. C. 20001  
PHONE: 202/546-6206

# Carpenters' Legislative Improvement Committee

March 3, 1978

## IMPORTANT ELECTION YEAR NOTICE

TO: ALL U.S. LOCAL UNIONS, STATE AND DISTRICT COUNCILS

The Federal Election Campaign Act of 1974 made certain changes in federal law that all Brotherhood Local Unions, State and District Councils need to be reminded of as we approach the November Congressional Elections:

1. If any Brotherhood Local Union, State or District Council has established a separate, voluntary, political fund, other than CLIC, that makes financial contributions of these voluntary monies to any federal candidates (President, Senator, Congressman), it is your obligation, not ours, to register that committee with the Federal Election Commission. Furthermore, it is your obligation to file on time the necessary reports of contributions made.
2. However, under the 1974 law, while it is your responsibility to register any political committee other than CLIC and to file the necessary reports, the law says that for purposes of contribution totals that the Brotherhood is considered one entity. AND WE AT THE NATIONAL LEVEL ARE RESPONSIBLE THAT CAMPAIGN CONTRIBUTION LIMITATIONS ARE NOT EXCEEDED BY ANY AFFILIATE OF THE BROTHERHOOD.

SUMMARY: The law says that no committee may contribute more than \$5,000 in a primary election and another \$5,000 in a subsequent general election to any federal candidate (President, Senator, Congressman). Furthermore, all committees must register with the F.E.C. and, of course, the contributing of treasury monies is illegal.

CONCLUSION-INSTRUCTIONS: Since we at CLIC are held responsible for the entire Brotherhood that the aforementioned monetary limitations are not exceeded, it is essential that all other existing committees report to us both the amount of any contribution and the name and office sought of the candidate.

If this situation applies to you, please follow this procedure.

Fraternally yours,

Charles E. Nichols  
General Treasurer and  
Director of Legislation

CEN/im  
opeiu 42/af1-cio

The Carpenters' Legislative Improvement Committee is an independent organization affiliated with the United Brotherhood of Carpenters and Joiners of America. It has no affiliation with the Carpenters' Union of America, the Carpenters' International Union of North America, or the Carpenters' Guild of America. A copy of this notice will be distributed to all local unions and state and district councils for their information. Contact: Charles E. Nichols, Director of Legislation, 101 Constitution Avenue, Washington, D.C. 20001.



FEDERAL ELECTION COMMISSION

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

April 14, 1978

Mr. Charles E. Nichols, Treasurer  
CARPENTERS LEGISLATIVE IMPROVEMENT COMMITTEE  
101 Constitution Avenue, N.W.  
Washington, D.C. 20001

Dear Mr. Nichols,

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 January 31 Year End  
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 Beverly Brown (800-424-9530) our Reports Analyst assigned to you.

Sincerely,

Orlando B. Potter  
Staff Director

Attachment

12

5-101

QUEST FOR ADDITIONAL INFORMATION FOR THE January 31 Year End REPORT OF RECEIPTS  
 AND EXPENDITURES COVERING THE PERIOD 10/1/77 THROUGH 12/31/77,  
 PURSUANT 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  
 turn 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
- Summary Page Line(s)  Column(s)  Totals  omitted or  incorrect
- Detailed Summary (Page 2) Line(s)  Column(s)  Totals  omitted or  incorrect
- 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

X Other: In their Thirty Day Report of receipts and expenditures the Ohio State Council of  
Carpenters discloses a transfer in of \$5,120 from your committee on 10/25/77. Your committee  
does not report the transfer out to the Ohio State Council of Carpenters Political Action  
Committee. Please explain the discrepancy noted here.

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.,  
 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.

330400327  
WILLIAM SIDELL  
GENERAL PRESIDENT  
UNITED BROTHERHOOD OF CARPENTERS  
AND JOINERS OF AMERICA  
1 CONSTITUTION AVE., N.W.  
WASHINGTON, D. C. 20001



SEP 25 9:54

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





FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20461

September 18, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

William Sidell, President  
United Brotherhood of Carpenters  
and Joiners of America  
101 Constitution Avenue, N.W.  
Washington, D.C. 20001

Re: MUR 667

Dear Mr. Sidell:

By this letter, the Federal Election Commission requests that you provide certain information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

According to Commission records, on October 7, 1977, the United Brotherhood of Carpenters and Joiners of America (hereafter "United Brotherhood") issued a check (number 22,260) in the amount \$5,000 to the Ohio State Council of Carpenters. In connection with the circumstances surrounding that transaction, please respond to the following questions:

- a) Who requested that the United Brotherhood transfer these funds?
- b) When was such request made?
- c) For what purpose were the funds requested?
- d) If the funds were requested by the Ohio State Council of Carpenters Political Action Committee, why was the check made payable to the Ohio State Council of Carpenters?
- e) On what date was the check forwarded from your headquarters?

3019082778

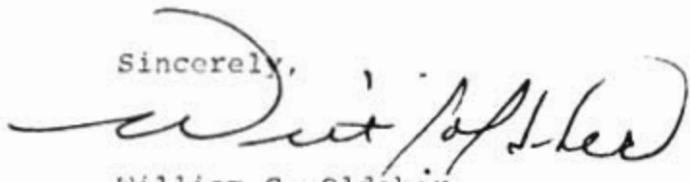
- f) To whom was the check forwarded?
- g) Did the United Brotherhood transfer any other funds either to the Ohio State Council of Carpenters or to the Ohio State Council of Carpenters Political Action Committee in October, 1977? If so, give particulars.

Please provide us with any available documentation in support of your answers, particularly in the form of correspondence and internal memoranda. In addition, we request that you provide a copy which shows both sides of the check in question.

This information is being requested as part of an investigation by the Federal Election Commission and is, therefore, subject to the confidentiality provisions of 2 U.S.C. §437g(a)(3)(B).

If you have any questions, please contact Vincent J. Convery, Jr., the attorney assigned to this matter, at 523-4058.

Sincerely,



William C. Oldaker  
General Counsel

WJC  
9/15/78

73040082774

*Convery MAR 66?*

1. The following service is requested (check one): <input type="checkbox"/> Show to whom and date delivery is to be made. <input checked="" type="checkbox"/> Show to whom, date, and address of delivery. <input type="checkbox"/> RESTRICTED DELIVERY Shows to whom and date delivery is to be made. <input type="checkbox"/> RESTRICTED DELIVERY Shows to whom, date, and address of delivery. \$ (CONSULT POSTMASTER FOR FEES)		2. ARTICLE ADDRESSED TO <i>William Oldaker 101 Constitution Ave., N.W. Wash., D.C. 20001</i>	
3. ARTICLE DESCRIPTION REGISTERED NO. <i>943222</i>	CERTIFIED NO.	INSURED NO.	(Always obtain signature of addressee or agent)
I have received the article described above. SIGNATURE <i>Edward McNeil</i>		Addressee <input checked="" type="checkbox"/> Authorized agent	POSTMARK <i>9-19-78</i>
5. ADDRESS: (Complete only if requested)			6. UNABLE TO DELIVER BECAUSE
			CLERK'S INITIALS

2090 1977-0-748-595



FEDERAL ELECTION COMMISSION

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

September 15, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Milan Marsh, Treasurer  
Ohio State Council of Carpenters  
Political Action Committee  
Post Office Box 68  
Girard, Ohio 44420

Re: MUR 667

Dear Mr. Marsh:

This is to advise you that on September 13, 1978, the Commission found reason to believe that the Ohio State Council of Carpenters Political Action Committee (OSCCPAC) violated Section 441b(b)(3)(A) of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §431 et seq.

This finding is based upon the following: On or about October 25, 1977, OSCCPAC accepted a contribution from the general treasury of a labor organization. This contribution was commingled in a single account with all other monies which had been contributed to OSCCPAC. Subsequently, in 1978, OSCCPAC made contributions in connection with Federal elections from this commingled account.

It is unlawful, under 2 U.S.C. §441b(b)(3)(A), for a separate segregated fund, such as OSCCPAC, to make a contribution or expenditure in connection with a Federal election by utilizing money or anything of value secured by dues, fees or other monies required as a condition of membership in a labor organization.

You are invited to provide the Commission with any information which will demonstrate that no further action should be taken against OSCCPAC under the Act. Such information should be submitted, in notarized form, within ten days of your receipt of this letter.

73040082773

Should you require any further information, please contact Vincent J. Convery, Jr., the Commission attorney assigned to this matter, at 202-523-4058.

Sincerely,

William E. Oldaker  
General Counsel

VJC  
9/15/78

Convery MUK-667

79040032776

PS Form 3811 Apr 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:  
Mildan Marsh, Treasurer  
Post Office Box 68  
Girard, Ohio 44420

3. ARTICLE DESCRIPTION

REGISTERED NO	CERTIFIED NO	INSURED NO
	943223	

(Always obtain signature of addressee or agent)

I have received the article described above

SIGNATURE  Addressee  Authorized agent

4. DATE OF DELIVERY 9/22/78 POSTMARK 340 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

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

September 15, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Frank J. McNamara, President  
Ohio State Council of the United  
Brotherhood of Carpenters and  
Joiners of America  
124 Liberty Street  
Youngstown, Ohio 44505

Re: MUR 667

Dear Mr. McNamara:

By this letter, the Federal Election Commission requests that you provide certain information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

According to Commission records, on October 7, 1977, the United Brotherhood of Carpenters and Joiners of America (hereafter, "United Brotherhood") issued a check in the amount \$5,000 to the Ohio State Council of Carpenters. In connection with the circumstances surrounding that transaction, please respond to the following questions:

- a) Who requested that the United Brotherhood transfer these funds?
- b) When was such request made?
- c) For what purpose were the funds requested?
- d) When did the Ohio State Council of Carpenters receive the funds?
- e) What did the Ohio State Council of Carpenters do with the United Brotherhood's check, i.e., did the Council deposit the check, cash it, endorse it to a third party, etc? On what date did it take this action?

73040082777

Please provide us with any available documentation in support of your answers, particularly in the form of correspondence and internal memoranda.

This information is being requested as part of an investigation by the Federal Election Commission and is, therefore, subject to the confidentiality provisions of 2 U.S.C. §437g(a)(3)(B).

If you have any questions, please contact Vincent J. Convery, Jr., the attorney assigned to this matter, at 202-523-4058.

Sincerely,

William C. Oldaker  
General Counsel

VSC  
9/15/78

7 8 0 4 0 0 8 2 7 7 8

75 Form 3811 Apr 1977 RETURN RECEIPT REGISTERED INSURED AND CERTIFIED MAIL

MUR-667 Convery

1. SEND TO: 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 C
- Show to whom, date, and address of delivery C
- RESTRICTED DELIVERY Show to whom and date delivered C
- RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ C

CONSULT POSTMASTER FOR FEES

2. ARTICLE ADDRESSED TO  
Frank J. McNamara, President  
124 Liberty Street  
Youngstown, Ohio 44505

3. ARTICLE DESCRIPTION

REGISTERED NO	CERTIFIED NO	INSURED NO
	443228	

(Always obtain signature of addressee or agent)

I have received the article described above

SIGNATURE  Addressee  Authorized agent

4. DATE OF DELIVERY: 11/21/78

POSTMARK: SEP 21 1978

5. ADDRESS (Complete only if requested):  
124 Liberty Street 44505

6. UNABLE TO DELIVER BECAUSE: \_\_\_\_\_

CLERK'S INITIALS:

September 8, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 667

Please have the attached First General Counsel's Report on MUR 667 distributed to the Commission on a 48 hour tally basis.

Thank you.

78040082779

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 667  
Ohio State Council of Carpenters )  
Political Action Committee )

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 13 1978, the Commission determined by a vote of 5-0 to adopt the following recommendations of the General Counsel, as set forth in the First General Counsel's Report in the above-captioned matter dated September 8, 1978.

1. Find reason to believe that the Ohio State Council of Carpenters Political Action Committee violated Section 441b(b)(3)(A) of the Federal Election Campaign Act of 1971, as amended, and authorize the sending of the letter to its Treasurer, attached to the above-named Report.
2. Authorize the sending of letters and questions, attached to the above-named Report, to the United Brotherhood of Carpenters and Joiners of America and to the Ohio State Council of the United Brotherhood.

Voting for these determinations were Commissioners Harris, Thomson, Tiernan, Staebler, and Springer.

9/14/78      Marjorie W. Emmons  
Date                      Marjorie W. Emmons  
Secretary to the Commission

Received in Office of Commission Secretary: 9-8-78, 5:05  
Circulated on 48 hour vote basis: 9-11-78, 4:00

7301332730

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL  
BY OGC TO COMMISSION SEP 8 1978

MUR NO. 667  
STAFF MEMBER(S) Convery

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: Ohio State Council of Carpenters  
Political Action Committee

RELEVANT STATUTE: 2 U.S.C. §441b(b) (3) (A)

INTERNAL REPORTS CHECKED: Reports of Receipts and Expenditures

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

This matter was received in the Office of General Counsel on July 28, 1978. It had been originated by the Reports Analysis Division by memo dated May 15, 1978. (See Attachment 1)

ALLEGATION

The Ohio State Council of Carpenters Political Action Committee (OSCCPAC) made contributions to Federal candidates by utilizing money secured by dues, fees or other monies required as a condition of membership in a labor organization. 1/

1/ OSCCPAC contributed \$450 to the Citizens for Tony Hall on February 27, 1978, and \$2,000 to the Howard Metzenbaum Post Election Committee on March 20, 1978.

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ANALYSIS

The matter came to light when, on December 5, 1977, OSCCPAC filed a 30 day post-election report of receipts and expenditures which disclosed that it had received \$5,120 from the United Brotherhood of Carpenters and Joiners of America (the Brotherhood). (See Attachment II). 2/

In their response to an FEC inquiry, OSCCPAC maintained that the \$5,120 was "for the purpose of supporting Issue #1 Voter registration referendum and solely for the education of [their] membership as to the pros and cons of this issue." OSCCPAC further stated that "Ohio law permits monies from all sources to be used on Issue Campaigns." (Attachment III). 3/

A review of OSCCPAC's reports of receipts and expenditures indicates that in 1977, they made no contributions in connection with a Federal election, but that, in 1976 and 1978, they did make such contributions.

Despite the fact that they engage in both Federal and non-Federal campaign activity, OSCCPAC has not established separate accounts to

---

2/ Communications between the Commission, the Carpenters Legislative Improvement Committee (the PAC maintained by the Brotherhood), and OSCCPAC have not conclusively established how the \$5,120 got into OSCCPAC's treasury.

In response to a "surface violation" letter, OSCCPAC stated that the \$5,120 had come from the Political Action Committee maintained by the Brotherhood, and amended its report accordingly. (See Attachments III and IV).

As a result of that response, an RFAI letter was sent to the Carpenters Legislative Improvement Committee. Replying to that RFAI, the Treasurer of CLIC stated that his PAC had not transferred \$5,120 to OSCCPAC. He indicated that the records of the general treasury of the Brotherhood had been reviewed, and that that review showed that a check in the amount \$5,000, drawn on the general treasury of the Brotherhood (and not on CLIC), had been sent to the Ohio State Council of Carpenters [and not to OSCCPAC]. A copy of that check, dated October 7, 1977, was attached to the Treasurer's letter. (See Attachments V and VI). Since the copy showed only the face of the check, we are unable, at this time, to explain the connection between the \$5,000 transferred to the Ohio State Council of Carpenters and the \$5,120 reported as received by the Ohio State Council of Carpenters Political Action Committee.

In light of the above, and for the purposes of this report, we are assuming that the \$5,120 that was contributed to OSCCPAC was contributed by a labor organization. Since, at this point, we cannot state whether that labor organization is the Brotherhood or is the Ohio State Council of Carpenters and Joiners, we will recommend that the Commission request further information from both groups.

3/ Although the FEC inquiry was addressed to OSCCPAC, the response came on Ohio State Council of Carpenters stationery. The individual who wrote the response serves both as Executive Secretary-Treasurer of the Council and as Treasurer of OSCCPAC.

segregate permissible from non-permissible Federal political contributions. See 11 CFR 102.6(a)(2)(i).<sup>4/</sup> Consequently, contributions and/or transfers in which were impermissible for Federal purposes became commingled with permissible Federal contributions.

#### CONCLUSION

It is unlawful for any separate segregated fund to make a contribution or expenditure by utilizing money or anything of value secured by dues, fees or other monies required as condition of membership in a labor organization or as a condition of employment, or by monies obtained in any commercial transaction. See 2 U.S.C. §441b(b)(3)(A).

In view of its commingling of permissible and non-permissible Federal contributions, OSCCPAC cannot on any reliable basis establish that the funds it contributed to Federal candidates in 1978 had been contributed to OSCCPAC by a nonunion donor.

#### RECOMMENDATION

1. Find reason to believe that the Ohio State Council of Carpenters Political Action Committee violated Section 441b(b)(3)(A) of the Act and authorize the sending of the attached letter to its Treasurer.
2. Authorize the sending of the attached letters and questions to the United Brotherhood of Carpenters and Joiners of America and to the Ohio State Council of the United Brotherhood.

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<sup>4/</sup> As an alternative to establishing two separate accounts, OSCCPAC would have been permitted to maintain a single committee to make contributions to Federal and non-Federal candidates. However, all contributions received by such a committee must otherwise be permissible under the Act. 11 CFR 102.6(a)(2)(ii). The general treasury monies of a labor organization may be used to establish, administer, and solicit contributions to, its separate segregated fund, 11 CFR 114.5(b), but not to make contributions to that fund. Thus, the financial transaction of this nature between a labor organization and OSCCPAC would not have been permissible under the Act.

#### Attachments:

- I. Memo from RAD, 15 May 78
- II. Pages 1 and 3 of OSCCPAC's 30 day post-election report
- III. Letter from OSCCPAC, 3 April 78
- IV. Amendment to 30 day report
- V. Letter from CLIC, 20 April 78
- VI. Copy of Check
- VII, VIII, IX. Proposed Letters

Date May 15, 1978

Analyst

Beverly Brown

TO: OFFICE OF GENERAL COUNSEL

MUR 667

Team Chief Steve Mims

Compliance Review CB

THROUGH: Staff Director SM

FROM: Assistant Staff Director for Reports Analysis TJH

DESCRIPTION:

Candidate/Committee OHIO STATE COUNCIL OF CARPENTERS POLITICAL ACTION COMMITTEE

Treasurer Milan Marsh

Address P.O. Box 68, Girard, Ohio 44420

REPORTS: (For reports reviewed, amendments, RFAI's, etc; see indices, Attachment 1)

Period Covered from 10/16/77 to 11/30/77

Total Receipts \$ 5,120 Total Expenditures \$ 10,100

Cash on Hand \$ 16,151 Debts \$ 0

REASON(S) FOR REFERRAL:

<u>Allegation(s)</u>	<u>Cite</u>	<u>Attachment</u>
<u>Receipt of Labor Funds</u>	<u>441b.</u>	<u>1,2,3</u>
<u>Comingling of Funds</u>	<u>102.6</u>	<u>1,2,3</u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>

HISTORY:

On December 5, 1977, the Ohio State Council of Carpenters PAC filed a Thirty Day report with the Federal Election Commission. In this report the committee disclosed a transfer in of \$5,120 from the United Brotherhood of Carpenters and Joiners of America (international affiliate). On January 1, 1978, the Commission sent an RFAI to the Ohio State Council of Carpenters PAC requesting them to explain the nature of receipt from the United Brotherhood of Carpenters and Joiners of America (see attachment #1). Their response dated February 4, 1978, stated " Receipt from United Brotherhood of Carpenters and Joiners of America is donation for Issue #1 Campaign" (apparently a local issue --see attachment #1). Following this response, the Commission sent a Surface Violation notice to the Ohio State Council of Carpenters PAC for accepting prohibited contribution money from a union (see attachment #2).

On April 3, 1978, the Ohio State Council of Carpenters PAC responded by letter to advise the Commission that the transfer in from the United Brotherhood of Carpenters

RAD File # 92-40

Attachment I

HISTORY:

and Joiners was "a legal contribution from their (United Brotherhood of Carpenters and Joiners) legal political action fund" (see attachment #2). Following this communication, a letter was sent to the Carpenter's Legislative Improvement Committee (Political action committee for the United Brotherhood of Carpenters and Joiners). This letter (RFAI) informed the Carpenter's Legislative Improvement Committee of their failure to disclose the transfer out to the Ohio State Council of Carpenters PAC (see attachment #3).

On April 21, 1978, the Commission received a letter from the Carpenter's Legislative Improvement Committee. The response from this committee clearly indicates that the Ohio State Council of Carpenters PAC had accepted labor treasury funds with the purpose of influencing issues other than federal elections. In addition, the letter discloses that only \$5,000 can be accounted for as having been transferred from the United Brotherhood's Union treasury (see attachment #3). The additional \$120,000 has not been properly accounted for.

RECOMMENDATIONS: The Reports Analysis Division recommends that the Ohio State Council of Carpenters PAC refund the \$5000 transfer to The United Brotherhood of Carpenters and Joiners of America. In addition, the Ohio State Council of Carpenters PAC should properly report this refund in their next quarterly report of receipts and expenditures.

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

RECEIVED  
FEDERAL ELECTION  
COMMISSION

77  
to-da

NOV 13 1977

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  
**Ohio State Council of Carpenters  
Political Action Committee**

2 Identification Number  
**C-0005306**

(b) Address (number and street)  
**P. O. Box 68**

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

(d) City, State and ZIP code  
**Girard, Ohio 44420**

(e) If "Yes," for which election?  
on \_\_\_\_\_ (date)  
(general, primary, runoff)

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 (f)  October 10 Quarterly Report

(c)  Tenth day report preceding \_\_\_\_\_ election on \_\_\_\_\_ in the State of \_\_\_\_\_  
(primary, general or convention) (date)

(d)  Thirtieth day report following GENERAL election on NOV. 8 in the State of Ohio  
(primary, general or convention) (date)

(g)  January 31 Year End Report  
(h)  Monthly Report \_\_\_\_\_ (Month)  
(i)  Termination Report

5 Reporting Period: From 10/15/77 Through 11/30/77

6 Candidate or Committee Summary of Receipts and Expenditures

	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 10		\$ 16,151.66
7 Cash on hand at beginning of reporting period	\$ 29,911.78	
8 Total receipts (From line 10)	\$ 5,120.00	\$ 23,458.00
(a) Subtotal (Add lines 7 and 8)	\$ 35,031.78	\$ 39,609.66
9 Total expenditures (From line 11)	\$ 10,100.00	\$ 14,677.88
10 Cash on hand at end of reporting period (Subtract line 9 from line 8)	\$ 24,931.78	\$ 24,931.73
11 Contributed items on hand to be liquidated (attach itemized list)	\$	\$
Section D - Political Committee Expenditures Subject to Limitation - Primary (76 D.C. Code, City Council District Candidates (Including District Fund))		
12 Contributing expenditures (From line 20)	\$	\$
13 Refunded receipts (From line 12)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from other source subject to limitation	\$	\$
(c) Net expenditures subject to limitation (Add lines 14a and 14b)	\$	\$

I hereby certify that I have examined this Report, and to the best of my knowledge and belief it is true and correct in all particulars.  
 \_\_\_\_\_  
 Title: Assistant Treasurer of Candidate  
 \_\_\_\_\_  
 Title: Treasurer of Candidate  
 \_\_\_\_\_  
 Title: \_\_\_\_\_

Failure to file this report or to file incomplete information may subject the person filing this report to the penalties of 2 U.S.C. 1975a or 52 U.S.C. 30421, and to criminal sanctions.

For information on filing requirements, see the instructions to this form or write the Commission for a copy of the instructions.  
 Federal Election Commission  
 5 K Street, N.W.  
 Washington, D.C. 20543

7803003783



FRANK J. McNAMARA  
President  
MILAN MARSH  
Executive Secretary-Treasurer

# OHIO STATE COUNCIL

— OF THE —

*United Brotherhood of Carpenters  
and Joiners of America*



124 Liberty Street  
Youngstown,  
Ohio 44505

Phone 216 759-1400  
216 759-1461

APR 6 11:27

April 3, 1978

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

Dear Sir,

In response to your communication dated March 27, 1978, 2SVI/78-19. This is to advise you we have not accepted any illegal contributions from the United Brotherhood of Carpenters that were reported 10/25/77.

This was a legal contribution from their legal Political Action Fund for the purpose of supporting Issue #1 Voter registration referendum and solely for the education of our membership as to the pros and cons of this issue. Ohio law permits monies from all sources to be used on Issue Campaigns.

Sincerely,

Milan Marsh  
Executive Secretary-Treasurer

Attachment III

MM/mm

77833000000619341972061



APR 21 12:44  
**Carpenters' Legislative Improvement Committee**

April 20, 1978

Mr Orlando B Potter  
Staff Director  
Federal Election Commission  
1125 K Street N W  
Washington, D C 20463

Dear Mr Potter:

This is in response to your correspondence and inquiry of April 14, 1978 regarding an apparent discrepancy in our not reporting out a transfer of \$5,120.00 to the Ohio State Council of Carpenters Political Action Committee.

A very careful check of all of our records for that period, including cancelled checks, reveals no such transaction took place. Our committee, quite simply, never sent a check for the amount in question to our Ohio State Council.

However, a further check on our part of the General Treasury financial records (not Carpenters Legislative Improvement Committee records) of the United Brotherhood reveals what we believe to be the source of confusion for this problem.

As you can see from the enclosed attachments, on October 7, 1977 a check drawn on General Treasury monies (not CLIC) in the amount of \$5,000.00 was sent to the Ohio State Council of Carpenters.

This money was used for voter education and get out the vote purposes. We have been informed by the Ohio State Council that it was definitely not used by them in support of any Federal candidates.

**Attachment II**

The Carpenters' Legislative Improvement Committee is an independent committee associated with the United Brotherhood of Carpenters and Joiners of America. It has no affiliation with the United Brotherhood of Carpenters and Joiners of America. A copy of our report filed with the appropriate Federal Election Commission will be available for purchase from the Superintendent of Documents, United States Government Printing Office, Washington, D. C. 20540.

2987706

Furthermore, we are sending along for your information a copy of correspondence we sent out on March 3, 1978 to all of our Local Unions, State and District Councils alerting them to what they, as affiliates of our organization, can and cannot do in this election year.

In summary, the Carpenters Legislative Improvement Committee made no such transfer to our Ohio State Council, and we feel confident that an amendment by them to their report will lay this matter to rest.

Sincerely yours,

Charles E Nichols  
General Treasurer

CEN/pa  
enclosure

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Attachment VI

DATE	CHECK NO.	PAY TO THE ORDER OF	AMOUNT
OCT 7 '77	22,260	OHIO STATE COUNCIL OF CARPENTERS	5,000.00

\$0,005,000.00

NATIONAL SAVINGS & TRUST COMPANY  
WASHINGTON, D.C.

*Charles E. Smith*  
 \_\_\_\_\_  
 Gen'l Treas.  
 \_\_\_\_\_  
 Gen'l Pres.-Gen'l Sec'y

⑈0003514⑈ ⑈0540⑈0052⑈ 454⑈080 ⑈⑈ ⑈000050000⑈



FEDERAL ELECTION COMMISSION

1325 K STREET NW  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Milan Marsh, Treasurer  
Ohio State Council of Carpenters  
Political Action Committee  
Post Office Box 68  
Girard, Ohio 44420

Re: MUR 667

Dear Mr. Marsh:

This is to advise you that on \_\_\_\_\_, 1978, the Commission found reason to believe that the Ohio State Council of Carpenters Political Action Committee (OSCCPAC) violated Section 441b(b)(3)(A) of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §431 et seq.

This finding is based upon the following: On or about October 25, 1977, OSCCPAC accepted a contribution from the general treasury of a labor organization. This contribution was commingled in a single account with all other monies which had been contributed to OSCCPAC. Subsequently, in 1978, OSCCPAC made contributions in connection with Federal elections from this commingled account.

It is unlawful, under 2 U.S.C. §441b(b)(3)(A), for a separate segregated fund, such as OSCCPAC, to make a contribution or expenditure in connection with a Federal election by utilizing money or anything of value secured by dues, fees or other monies required as a condition of membership in a labor organization.

You are invited to provide the Commission with any information which will demonstrate that no further action should be taken against OSCCPAC under the Act. Such information should be submitted, in notarized form, within ten days of your receipt of this letter.

7 9 0 4 0 0 8 2 7 9 3  
A++ VII

Should you require any further information, please contact Vincent J. Convery, Jr., the Commission attorney assigned to this matter, at 202-523-4058.

Sincerely,

William C. Oldaker  
General Counsel

73040082794



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

William Sidell, President  
United Brotherhood of Carpenters  
and Joiners of America  
101 Constitution Avenue, N.W.  
Washington, D.C. 20001

Re: MUR 667

Dear Mr. Sidell:

By this letter, the Federal Election Commission requests that you provide certain information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

According to Commission records, on October 7, 1977, the United Brotherhood of Carpenters and Joiners of America (hereafter "United Brotherhood") issued a check (number 22,260) in the amount \$5,000 to the Ohio State Council of Carpenters. In connection with the circumstances surrounding that transaction, please respond to the following questions:

- a) Who requested that the United Brotherhood transfer these funds?
- b) When was such request made?
- c) For what purpose were the funds requested?
- d) If the funds were requested by the Ohio State Council of Carpenters Political Action Committee, why was the check made payable to the Ohio State Council of Carpenters?
- e) On what date was the check forwarded from your headquarters?

A++ VIII

79040782795

- f) To whom was the check forwarded?
- g) Did the United Brotherhood transfer any other funds either to the Ohio State Council of Carpenters or to the Ohio State Council of Carpenters Political Action Committee in October, 1977? If so, give particulars.

Please provide us with any available documentation in support of your answers, particularly in the form of correspondence and internal memoranda. In addition, we request that you provide a copy which shows both sides of the check in question.

This information is being requested as part of an investigation by the Federal Election Commission and is, therefore, subject to the confidentiality provisions of 2 U.S.C. §437g(a)(3)(B).

If you have any questions, please contact Vincent J. Convery, Jr., the attorney assigned to this matter, at 523-4058.

Sincerely,

William C. Oldaker  
General Counsel

78040082795



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Frank J. McNamara, President  
Ohio State Council of the United  
Brotherhood of Carpenters and  
Joiners of America  
124 Liberty Street  
Youngstown, Ohio 44505

Re: MUR 667

Dear Mr. McNamara:

By this letter, the Federal Election Commission requests that you provide certain information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

According to Commission records, on October 7, 1977, the United Brotherhood of Carpenters and Joiners of America (hereafter, "United Brotherhood") issued a check in the amount \$5,000 to the Ohio State Council of Carpenters. In connection with the circumstances surrounding that transaction, please respond to the following questions:

- a) Who requested that the United Brotherhood transfer these funds?
- b) When was such request made?
- c) For what purpose were the funds requested?
- d) When did the Ohio State Council of Carpenters receive the funds?
- e) What did the Ohio State Council of Carpenters do with the United Brotherhood's check, i.e., did the Council deposit the check, cash it, endorse it to a third party, etc? On what date did it take this action?

A++ IX

73030082797

Please provide us with any available documentation in support of your answers, particularly in the form of correspondence and internal memoranda.

This information is being requested as part of an investigation by the Federal Election Commission and is, therefore, subject to the confidentiality provisions of 2 U.S.C. §437g(a)(3)(B).

If you have any questions, please contact Vincent J. Convery, Jr., the attorney assigned to this matter, at 202-523-4058.

Sincerely,

William C. Oldaker  
General Counsel

7 3 0 4 0 0 8 2 7 9 9

IX

Date May 15, 1978

Analyst: Beverly Brown <sup>0-97</sup> bl

TO: OFFICE OF GENERAL COUNSEL

Team Chief Steve Mims SM

Compliance Review CB

THROUGH: Staff Director ABP

FROM: Assistant Staff Director for Reports Analysis TJK

MUR 667

DESCRIPTION:

Candidate/Committee OHIO STATE COUNCIL OF CARPENTERS POLITICAL ACTION COMMITTEE

Treasurer Milan Marsh

Address P.O. Box 68, Girard, Ohio 44420

REPORTS: (For reports reviewed, amendments, RFAI's, etc; see indices, Attachment 1)

Period Covered from 10/16/77 to 11/30/77

Total Receipts \$ 5,120 Total Expenditures \$ 10,100

Cash on Hand \$ 16,151 Debts \$ 0

REASON(S) FOR REFERRAL:

<u>Allegation(s)</u>	<u>Cite</u>	<u>Attachment</u>
<u>Receipt of Labor Funds</u>	<u>441b.</u>	<u>1,2,3</u>
<u>Comingling of Funds</u>	<u>102.6</u>	<u>1,2,3</u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>

HISTORY:

On December 5, 1977, the Ohio State Council of Carpenters PAC filed a Thirty Day report with the Federal Election Commission. In this report the committee disclosed a transfer in of \$5,120 from the United Brotherhood of Carpenters and Joiners of America (international affiliate). On January 1, 1978, the Commission sent an RFAI to the Ohio State Council of Carpenters PAC requesting them to explain the nature of receipt from the United Brotherhood of Carpenters and Joiners of America (see attachment #1). Their response dated February 4, 1978, stated " Receipt from United Brotherhood of Carpenters and Joiners of America is donation for Issue #1 Campaign" (apparently a local issue --see attachment #1). Following this response, the Commission sent a Surface Violation notice to the Ohio State Council of Carpenters PAC for accepting prohibited contribution money from a union (see attachment #2).

On April 3, 1978, the Ohio State Council of Carpenters PAC responded by letter to advise the Commission that the transfer in from the United Brotherhood of Carpenters

RAD File # 8L-40

HISTORY:

and Joiners was "a legal contribution from their ( United Brotherhood of Carpenters and Joiners) legal political action fund" (see attachment #2). Following this communication, a letter was sent to the Carpenter's Legislative Improvement Committee ( Political action committee for the United Brotherhood of Carpenters and Joiners). This letter (RFAI) informed the Carpenter's Legislative Improvement Committee of their failure to disclose the transfer out to the Ohio State Council of Carpenters PAC (see attachment #3).

On April 21, 1978, the Commission received a letter from the Carpenter's Legislative Improvement Committee. The response from this committee clearly indicates that the Ohio State Council of Carpenters PAC had accepted labor treasury funds with the purpose of influencing issues other than federal elections. In addition, the letter discloses that only \$5,000 can be accounted for as having been transferred from the United Brotherhood's Union treasury (see attachment #3). The additional \$120 has not been properly accounted for.

RECOMMENDATIONS: The Reports Analysis Division recommends that the Ohio State Council of Carpenters PAC refund the \$5000 transfer to The United Brotherhood of Carpenters and Joiners of America. In addition, the Ohio State Council of Carpenters PAC should properly report this refund in their next quarterly report of receipts and expenditures.

ATTACHMENT #1



FEDERAL ELECTION COMMISSION

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

January 27, 1978

Mr. Milan Marsh, Treasurer  
Ohio State Council of Carpenters  
Political Action Committee  
P.O. Box 68  
Girard, Ohio 44420

Dear Mr. Marsh,

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 Thirty Day  
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 Beverly Brown (800-424-9530) our Reports Analyst assigned to you.

Sincerely,

Orlando B. Potter  
Staff Director

Attachment

12

7-92900-1016-483-088004

O: OHIO STATE COUNCIL OF CARPENTERSDATE: 1/27/78POLITICAL ACTION COMMITTEEI.D. NO.: C00005306

REQUEST FOR ADDITIONAL INFORMATION FOR THE Thirty Day REPORT OF RECEIPTS  
 AND EXPENDITURES COVERING THE PERIOD 10/16/77 THROUGH 11/30/77,  
 PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A 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

Summary Page Line(s)  Column(s)  Totals  omitted or  incorrect

Detailed Summary (Page 2) Line(s) 25 Column(s) B Totals  omitted or  incorrect

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) B Line(s) 23

Nature or Purpose of Receipt  omitted or  inadequate for Schedule(s) A Line(s) 15

Inadequate Description of  proceeds  dates  events  location of Schedule

Other: Please explain the nature of receipt from the United Brotherhood of

Carpenters & Joiners of America. In addition, please explain the nature of the

transfer-out to "Issue #1 Campaign." (Also, see attached sheet.)

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.

**Schedule A**

July 1976  
Federal Election Commission  
175 K 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 3 of 4 for

LINE NUMBER 18

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

Name of Candidate or Committee in full

Ohio State Council of Carpenters Political Action Committee

Full Name, mailing address and ZIP code United Brotherhood of Carpenters & Joiners of America 101 Constitution Ave. - Washington, D. C. 20001		Date (month, day, year)	Amount of each receipt this period
Principal place of business Washington, D. C.	Occupation Labor Org. <input type="checkbox"/> Check if Contributor is self-employed	10/25/77	5,120.00
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 ▶ \$			

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) ▶	\$5,120.00
Total this period (last page this line number only) ▶	\$5,120.00

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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 20

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

Name of Candidate or Committee in full

Ohio State Council of Carpenters Political Action Committee

Full Name, mailing address and ZIP code

Issue # 1 Campaign  
271 E. State St.  
Columbus, Ohio 43215

Purpose of Expenditure

Issue # 1  
Voter Registration  
Campaign

Date (month, day, year)

10/20/77

Amount of each expenditure this period

10,000.00

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) . . . . . ▶ \$ 10,000.00

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

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73030664675

Request for additional information

Receipt from United Brotherhood of Carpenters & Joiners of America is  
donation for Issue # 1 Campaign.

7'8 30 00 10'6 16 03 16 04 16 87 07

ATTACHMENT #2

73040181837



FRANK J. McNAMARA  
President  
MILAN MARSH  
Executive Secretary-Treasurer

# OHIO STATE COUNCIL

124 Liberty Street  
Youngstown,  
Ohio 44505

— OF THE —

*United Brotherhood of Carpenters  
and Joiners of America*

Phone 216 759-1400  
216 759-1461



April 3, 1978

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

Dear Sir,

In response to your communication dated March 27, 1978,  
2SVI/78-19. This is to advise you we have not accepted any  
illegal contributions from the United Brotherhood of Carpenters  
that were reported 10/25/77.

This was a legal contribution from their legal Political  
Action Fund for the purpose of supporting Issue #1 Voter  
registration referendum and solely for the education of our  
membership as to the pros and cons of this issue. Ohio law  
permits monies from all sources to be used on Issue Campaigns.

Sincerely,

Milan Marsh  
Executive Secretary-Treasurer



ATTACHMENT #3

730400811



FEDERAL ELECTION COMMISSION

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

April 14, 1978

Mr. Charles E. Nichols, Treasurer  
CARPENTERS LEGISLATIVE IMPROVEMENT COMMITTEE  
101 Constitution Avenue, N.W.  
Washington, D.C. 20001

Dear Mr. Nichols,

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 January 31 Year End  
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 Beverly Brown (800-424-9530) our Reports Analyst assigned to you.

Sincerely,

*Orlando B. Potter*

Orlando B. Potter  
Staff Director

Attachment

12

TO: CARPENTERS LEGISLATIVE IMPROVEMENT COMMITTEE DATE: 4/14/78  
 I.D. NO.: C00001016

REQUEST FOR ADDITIONAL INFORMATION FOR THE January 31 Year End REPORT OF RECEIPTS  
 AND EXPENDITURES COVERING THE PERIOD 10/1/77 THROUGH 12/31/77  
 PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A 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
- Summary Page Line(s)  Column(s)  Totals  omitted or  incorrect
- Detailed Summary (Page 2) Line(s)  Column(s)  Totals  omitted or  incorrect
- 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: In their Thirty Day Report of receipts and expenditures the Ohio State Council of Carpenters discloses a transfer in of \$5,120 from your committee on 10/25/77. Your committee does not report the transfer out to the Ohio State Council of Carpenters Political Action Committee. Please explain the discrepancy noted here.

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 (300) 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.



CHARLES E. NICHOLS  
DIRECTOR AND TREASURER  
101 CONSTITUTION AVE., WASHINGTON, D. C. 20001  
PHONE: 202/546-6206

1978 APR 21 AM 12:44

# Carpenters' Legislative Improvement Committee

April 20, 1978

Mr Orlando B Potter  
Staff Director  
Federal Election Commission  
1125 K Street N W  
Washington, D C 20463

Dear Mr Potter:

This is in response to your correspondence and inquiry of April 14, 1978 regarding an apparent discrepancy in our not reporting out a transfer of \$5,120.00 to the Ohio State Council of Carpenters Political Action Committee.

A very careful check of all of our records for that period, including cancelled checks, reveals no such transaction took place. Our committee, quite simply, never sent a check for the amount in question to our Ohio State Council.

However, a further check on our part of the General Treasury financial records (not Carpenters Legislative Improvement Committee records) of the United Brotherhood reveals what we believe to be the source of confusion for this problem.

As you can see from the enclosed attachments, on October 7, 1977 a check drawn on General Treasury monies (not CLIC) in the amount of \$5,000.00 was sent to the Ohio State Council of Carpenters.

This money was used for voter education and get out the vote purposes. We have been informed by the Ohio State Council that it was definitely not used by them in support of any Federal candidates.

730778281  
730778281



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DATE	CHECK NO.	PAY TO THE ORDER OF	AMOUNT
OCT 7 '77	22,260	OHIO STATE COUNCIL OF CARPENTERS	5,000.00

\$0,005,000.00

NATIONAL SAVINGS TRUST COMPANY  
WASHINGTON, D.C.

*Charles E. Smith*  
Gen'l. Treas.  
Gen'l. Pres. - Gen'l. Sec'y

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# REQUISITION FOR DISBURSEMENT

Date: October 6, 1977

TO: GENERAL TREASURER

FROM: William Sidell

PAYABLE TO: Ohio State Council of Carpenters

AMOUNT: \$5,000.00

PURPOSE: Donation for Election Day Voter  
Registration Law

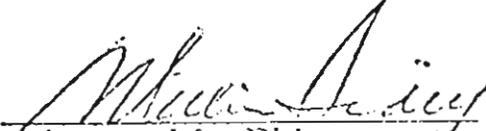
REMARKS:

709707251  
 1800116  
 29711002817

**PAID**  
 OCT 7 1977  
 CHECK No. \_\_\_\_\_

\_\_\_\_\_  
 Recommended by

41220

  
 Approved for Disbursement

WS:sd

Date: October 6, 1977







FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 667

Date Filmed 12/28/78 Camera No. --- 2

Cameraman GPC