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FEDERAL ELECTION COMMISSION  
OFFICE SERVICES BRANCH

# Sundstrand Corporation



91 JUL -8 AM 9: 19

CORPORATE OFFICES • 4949 HARRISON AVENUE P.O. BOX 7003 • ROCKFORD ILLINOIS 61125 7003 • PHONE (815) 226 8000 • TWX 910 631-4255 • TELEX 25 7440

July 2, 1991

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FEDERAL ELECTION COMMISSION  
OFFICE SERVICES BRANCH  
91 JUL -8 AM 11: 30

Mr. Bradley Litchfield  
Associate General Counsel for Policy  
Office of the General Counsel  
999 E Street NW  
Washington, D.C. 20463

Dear General Counsel:

I seek an opinion from the FEC about the structure and operation of one of our political action committees, the Sundstrand Corporation Good Government Pledge Program (FEC #C00095422). Since this particular committee's structure is unique, the regulations are not always clear with respect to its operations.

The "Good Government Pledge Program" PAC was established in 1978 and has since been operated without question by the FEC except for requests for minor reporting clarifications. The fundamental principle of the program is to encourage members of the restricted class to participate in the political process through program activities and financial contributions from individually controlled accounts.

Members of the restricted class contribute, through payroll deduction or direct payment, to accounts in their names which are established by the Company but controlled completely by the contributing individual. "Complete control" means that the individual is free to withdraw any or all monies from his or her account without restriction. And, it is only at the individual's direction that money from the account can be disbursed to the Good Government Pledge Program political action committee for contribution to a candidate or political organization of the person's choice.

Mr. Bradley Litchfield  
Page Two  
July 2, 1991

Funds from all accounts are kept in a non-interest bearing account at a local bank. The cumulative total of these individual accounts is not reported in our monthly FEC filings, since the funds are still controlled by the individuals and not the political action committee. Once an individual designates funds for a political purpose, those funds are considered to be under the control of the political action committee and are thus treated as a contribution to the PAC. (Such "control" notwithstanding, funds are always disbursed as directed by the employee.) The contribution is then reported as a receipt on Schedule A, and the disbursement is reported as a Schedule B expenditure, as defined by FEC reporting guidelines. The \$5,000 contribution limit per candidate per campaign is applied to all political contributions from the Program and our affiliated PAC, the Support Fund.

Withdrawals from individual accounts for non-political purposes are not reported in our monthly FEC filings, since they are simply withdrawn from personal accounts and are not reportable transactions affecting the political process.

This approach has many benefits for our members, since it promotes individual control and involvement in the political process. Unlike most other PACs, which distribute funds at the discretion of a small committee, our Good Government Pledge Program emphasized individual decision making and involvement.

Because our program is structured differently than most, I would appreciate your opinion regarding the above-described. Thank you for your time and consideration. I can be reached at 815/226-7674 if you need additional information.

Sincerely,



Bradley J. Considine  
Corp. Mgr., Public Affairs  
PAC Treasurer

**Sundstrand Corporation**  
**Good Government Program**

**Foreword**

For many years, it has been our Company's policy to encourage employee participation in civic and political affairs

Our form of government derives its strength from individual participation in the democratic process and from citizens' support of the best qualified people to serve in public office. Many employees express their interest in, and support for, the political party or candidates of their choice by expending time, effort and financial support.

For this reason, our Sundstrand Corporation Good Government Program was established.

The Sundstrand Corporation Good Government Program is a federally registered nonpartisan, voluntary, political contribution plan for eligible employees of Sundstrand Corporation and its operating units. The Program permits employees to contribute to political candidates and parties of their choice. Participation is voluntary and eligible employees may refuse to contribute without reprisal.

Participants are asked to fill out two cards. An addressed envelope is provided for mailing the cards to the Treasurer's office.

The first card is to the Treasurer requesting your participation in the Program.

The second card authorizes your Payroll Department to deduct whatever amount you want withheld. The payroll department will make the deduction and send it to the bank each pay period. You are free to change your deduction at any time. For your records, the amount withheld will appear on your earnings statement.

To withdraw money from your account, please complete the check request form provided and send it to the Treasurer. The Treasurer will then issue a check to the payee you have designated and complete the transaction as you request.

There is no cost to you for joining the Program, the operating expenses are paid by the Company.

**By Laws**  
**Sundstrand Corporation Good Government Program**

**Article I**

**Name**

The name of this organization shall be the Sundstrand Corporation Good Government Program (the "Program")

**Article II**

**Purpose and Objective**

The Sundstrand Program is nonpartisan and voluntary, and has as its primary purposes the obtaining and analysis of information regarding political candidates, parties and issues considered to be of interest collectively to employees of Sundstrand Corporation (the "Company"), and to provide Program members the opportunity, on a voluntary basis, to make contributions in support of political candidates or organizations pursuant to a coordinated program through voluntary payroll deductions

The Sundstrand Program shall operate as a political action committee and be registered with the Federal Election Commission The Program will be administered by the Corporate Public Affairs office of the Company

The Company will bear all the administrative expenses of the Program as allowed by the Federal Election Commission

**Article III**

**Advisory Board**

The overall policy and administrative guidance of the Sundstrand Program shall be the responsibility of an Advisory Board The Advisory Board shall make reasonable efforts to collect and analyze information as to various candidates and parties considered by the Advisory Board to be of interest from the standpoint of Company employees The Advisory Board will review requests for political contributions, and will submit to individual participants for their consideration the names of candidates, parties or political organizations recommended by the Advisory Board for financial support from the Sundstrand Program

The Advisory Board shall consist of eight members appointed by the management of the Company Terms shall be two years, with half the members up for reappointment every other year at the discretion of management of the Company In the event of a vacancy on the Advisory Board, management of the Company shall appoint a successor who shall serve the remainder of the unexpired term

A majority of the members of the Advisory Board shall constitute a quorum for the transaction of Advisory Board functions at any meeting of the Advisory Board

The act of the majority of the members of the Advisory Board present at a meeting at which there is a quorum shall be the act of the Advisory Board In the event of a deadlock in voting on any matter other than the amendment of bylaws, the Chairman of the Advisory Board may exercise two votes to break the deadlock and form a majority

Any action required or permitted to be taken at any meeting of the Advisory Board may be taken without a meeting if a quorum of members of the Advisory Board consent thereto, and minutes of the proceedings are filed

**Article IV**

**Treasurer and Assistant Treasurer**

A Treasurer shall be appointed by management of the Company and will also be Program Administrator for the Sundstrand Program The Treasurer will be based in Rockford An Assistant Treasurer shall also be appointed by management of the Company and will assume duties of the Treasurer in his or her absence or inability to act The Treasurer will be responsible for day-to-day administration of the Sundstrand Program, maintenance of all records and preparation and filing of all reports required

The Treasurer from time to time will request each participant to make contributions for the purposes of the Sundstrand Program All of the collected funds will be deposited in national or state banks as selected by the Treasurer with the consent of the Advisory Board Any bank so selected (hereinafter the "Bank") will act as an agent of the fund and will disburse all funds as directed by the Treasurer who shall act at the direction of the specific participating employee

**Article V**

**Membership and Participation**

1 The eligible employees shall be salaried employees who possess positions of a professional, administrative, or an executive nature, including officers of the company whose principal responsibilities are that of managing the business of the Company

2 Participation in the Sundstrand Program and contributions made through it are completely voluntary and eligible employees may refuse to participate without reprisal

3 To participate in the Sundstrand program an eligible employee will complete two forms to be submitted to the Treasurer (1) A form addressed to the Treasurer stating the decision of the employee to

become a participant (2) A form addressed to the appropriate payroll department of the Company authorizing payroll deductions for the purpose of the Program By requesting the appropriate form from the Treasurer the participant may increase or decrease the payroll deduction amount at any time

4 The amount that each participant authorizes to be deducted from his paycheck will be deducted in equal installments and forwarded to the Bank for deposit The amount deducted will appear on the earning statements of each participating employee

A participant may cancel his participation at any time by written notice to the Treasurer

5 At all times, funds deducted from a participant's paycheck and on deposit with the Bank remain the property of the participant At any time, a participant may receive any part of the funds on deposit in his account

6 A participant may respond to the recommendations of the Advisory Board by a written authorization requesting that a check for a specific amount be drawn for the recommended individual or organization and charged to his or her account Participants have the right to refuse to contribute without reprisal No contribution shall be made payable to the Advisory Board or the Treasurer by a participant in the Sundstrand Program Participants may authorize contributions to candidates or organizations not recommended by the Advisory Board

7 Any contribution guidelines from the Advisory Board are merely suggestions and members are free to contribute more or less than the guidelines suggest The amount of the contribution, or the refusal to contribute, will not benefit or disadvantage the solicitee

8 The checks are issued by the Treasurer for transmittal to the appropriate candidate or organization Each time the Treasurer disburses a contribution, the Treasurer will send a copy of the check to the participant requesting the contribution

9 Other than the participant, only the Sundstrand Program Treasurer, the Assistant Program Treasurer, the Public Affairs Coordinator and the Sundstrand Good Government Program auditors will be allowed access to view a participant's account

10 Other than to ensure that membership lists are in compliance with federal and local law, only the Sundstrand Program Treasurer, the Assistant Program Treasurer, the Public Affairs Coordinator, the Sundstrand Good Government Program auditors, and the Public Affairs Correspondents (for his/her unit only) will be allowed to view membership lists Public Affairs Correspondents are appointed for each unit or division to assist the Treasurer in administering the Program functions for that individual unit or division

## Article VI

### F E C Regulations

The Sundstrand Program shall comply with all federal, state and local regulations The Treasurer will file all required reports Participants should note that under federal law no individual may contribute more than \$1,000 per federal candidate, per campaign (i.e. primary and general campaigns) In addition, no individual may make political contributions to parties or candidates for federal office aggregating more than \$25,000 in any calendar year All applicable reports to government agencies with regard to the activities of the Sundstrand Program will be filed by the Treasurer The burden of filing any other reports shall remain with the individual contributors or recipient of contributions as applicable

Funds from the Sundstrand Good Government Program Accounts may be directly disbursed to a candidate for state or local office but only in those states where the Sundstrand Program has been registered with the appropriate state office

## Article VII

### Amendment

These Bylaws may be amended by the affirmative vote of a majority of the members of the Advisory Board

**SUNDSTRAND  
GOOD  
GOVERNMENT  
PROGRAM** 

**PARTICIPATION**

**Sundstrand Good Government Program  
4949 Harrison Avenue, P.O. Box 7003  
Rockford, IL 61125**

Attn Bradley J Considine, Treasurer

- YES! I would like to join the Sundstrand Good Government Program and begin receiving the benefits of membership
- No, I do not wish to join the Program at this time

I have read and understand the by-laws of the Sundstrand Good Government Program I understand that my contributions are voluntary and may be made through payroll deductions, and that I have the right to refuse to contribute without reprisal

My contributions to the Program will remain my personal property, and disbursed solely at my instructions In the event of dissolution of the Program, any residual funds being held for me shall be returned Also, in the event of the termination of my employment by retirement, resignation or otherwise, any undesignated contributions shall be returned as soon as practicable after I have notified the Treasurer of the termination of my employment In the event of my death (Check one square)

Funds should be paid to my designated beneficiary under the company's Group Life Insurance Plan

Funds should be paid to \_\_\_\_\_  
\_\_\_\_\_

Name (Type or Print) \_\_\_\_\_

Signature \_\_\_\_\_

Title \_\_\_\_\_ Soc Sec # \_\_\_\_\_

Sundstrand Div /Loc /Dept # \_\_\_\_\_

Home Address \_\_\_\_\_  
\_\_\_\_\_

Date \_\_\_\_\_



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

July 15, 1991

Bradley J. Considine  
Sundstrand Corporation  
4949 Harrison Avenue  
P.O. Box 7003  
Rockford, Illinois 61125-7003

Dear Mr. Considine:

The Office of General Counsel has received your letter of July 2, 1991, requesting an advisory opinion concerning the application of the Federal Election Campaign of 1971, as amended, to the structure and operation of the Sundstrand Corporation Good Government Pledge Program (the "Pledge Program").

You state that the Pledge Program is a committee with a unique structure. The Pledge Program utilizes individual accounts created in the names of the participants in the program. You also explain that at a participant's direction, money from the account can be disbursed to the Pledge Program for use to make contributions to a candidate or political committee of the participant's choice. You state that when this occurs, the Pledge Program reports the receipt of a contribution from that participant. You wish to know whether this method is correct under FEC reporting procedures.

The Act authorizes the Commission to issue an advisory opinion in response to a "complete written request" from any person with respect to a specific transaction or activity by the requesting person. 2 U.S.C. §437f(a). Commission regulations explain that such a request "shall include a complete description of all facts relevant to the specific transaction or activity with respect to which the request is made." 11 CFR 112.1(c).

After a preliminary review of your inquiry, this Office has determined that additional information is necessary. Therefore, please provide copies of the following documents: the bylaws or similar governing documents describing the administration of the Pledge Program, solicitations or information given to employees regarding the Pledge Program, forms used by employees to authorize payroll deductions to the Pledge Program, and forms used to authorize the

Letter to Bradley J. Considine  
Page 2

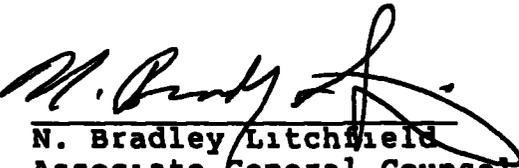
distribution of funds for political contributions. Commission records indicate that the Sundstrand Corporation Good Government Support Fund (the "Support Fund") is affiliated with the Pledge Program. Please provide similar documentation for the Support Fund as well.

Upon receiving your responses to the request for the foregoing documents, this office and the Commission will give further consideration to your inquiry as an advisory opinion request. If you have any questions concerning the advisory opinion process, or this letter, please contact the undersigned.

Sincerely,

Lawrence M. Noble  
General Counsel

by:

  
N. Bradley Litchfield  
Associate General Counsel

06-C 2425

# Sundstrand Corporation



CORPORATE OFFICES • 4949 HARRISON AVENUE PO BOX 7003 • ROCKFORD ILLINOIS 61125 7003 • PHONE (815) 226 6000 • TWX 910 631 4255 • TELEX 25 7440

August 30, 1991

Mr Bradley Litchfield  
Associate General Counsel for Policy  
Office of the General Counsel  
999 E Street NW  
Washington, D C 20463

RECEIVED  
FEDERAL ELECTION COMMISSION  
91 SEP -9 AHIO: 05

Dear Mr Litchfield

AOR 1991-29

Thank you for your response to my request for an advisory opinion with regard to the structure and operation of the Sundstrand Corporation Good Government Pledge Program

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Enclosed are the following documents which you requested the bylaws describing the administration of the Pledge Program, solicitations and information given to employees regarding the Pledge Program, forms used by employees to authorize payroll deductions to the Pledge Program, and forms used to authorize the distribution of funds for political contributions With regard to the Sundstrand Corporation Good Government Support Fund, an affiliated PAC of the Pledge Program, enclosed are operational guidelines currently in effect.

Once again, thank you for reviewing this program I look forward to your response

Sincerely,

*Bradley J. Considine*  
Bradley J. Considine  
Corp Mgr , Public Affairs  
PAC Treasurer

*From the time the seeds of the American Revolution were first taking root in this new land, one of the basic principles that shaped our country's growth was participatory government. The idea of an informed, involved citizenry was a key element in the design of our political system*

*Today, sheer size has made participation more difficult, but it is no less important. The issues being decided daily by our elected officials affect us all*

*At Sundstrand, you have an opportunity to participate in the political process through the Sundstrand Good Government Program (SGGP)*

*Through this federally registered political action committee, you can learn about issues and candidates, contribute to political campaigns, and help shape the future of your country. The Program is your opportunity to take your place among the informed, involved citizenry*

**Q.** *What is the Sundstrand Good Government Program and why was it established?*

**A.** The Sundstrand Good Government Program (SGGP) is a federally registered, nonpartisan political action committee (PAC) which provides you, as an eligible Sundstrand employee, with a convenient method to make voluntary contributions to political candidates and parties. Sundstrand started the Program in 1978 to promote political awareness and involvement among employees. There are three basic functions of the Program: administration and disbursement of member contributions, recommendation of candidates, and communications.

Your contributions are administered by the Treasurer in accordance with Federal Election Commission regulations.

Candidates are recommended for your support after review by the Advisory Board.

Communications include newsletters, speeches, debates, and informal gatherings with candidates, legislators and civic leaders. The Program staff is also available to provide you with information on a request basis regarding voting questions, candidates' positions, correspondence with elected officials, and other political issues.

**Q.** *Who is eligible to participate?*

**A.** Membership in the Program is open to salaried employees in professional, administrative, or executive positions.

**Q.** *Is membership voluntary?*

**A.** Yes. Membership and contributions are completely voluntary and as confidential as allowed by law. Your decisions on participation and contributions will not affect your employment in any way.

Only those involved in processing payroll deductions and contributions will have access to membership information. The amount of your payroll deduction to the Program is confidential. The amounts and recipients of your political contributions are confidential until reports are filed with the Federal Election Commission and your state's Board of Election, after which information is available, upon written request, from the Government.

**Q.** *How much should I contribute?*

**A.** Since contributions to the Program are totally voluntary, there is no recommended amount. Administrative costs of the Program are paid by Sundstrand, so your whole deduction goes to your own Program account.

Our records show that most members' deductions range from \$3.00 to \$8.00 per pay period for their individual accounts.

**Q.** *How do I make a contribution?*

**A.** Most participants choose to have funds deducted from their paychecks, and deposited into their individual Program accounts. When you want to make a contribution, you send a check request or a signed note to the Treasurer authorizing that a check be drawn from your account.

The check is then sent directly to the candidate or party you have chosen, or to you for distribution, and a copy is sent to you for your records

If you prefer, you can have a check made out to you, and send a personal check for your contribution

**Q. Who can receive contributions?**

**A.** Candidates for federal office, national committees of major political parties, and other political action committees may receive funds directly from your account, upon your authorization in some states (where the Program is registered), you may also contribute to candidates for state and local offices. Your local Program representative can tell you whether a particular candidate or group is eligible

If you want to contribute to a candidate or group that is not eligible, you may withdraw funds from your account and send your contribution on your own

**Q. How are candidates chosen for support by the Program?**

**A.** Most often, candidates are recommended for support by Advisory Board members or Program members. Candidates may also request Program support

All requests or recommendations for support are researched by the Advisory Board on the basis of voting records, platforms, and issue statements. Those who show constructive attitudes toward business issues are usually recommended for support

**Q. Why contribute through the Program instead of directly?**

**A.** As an individual contributor to a political campaign, you can have only a limited effect through your donation. When you pool your resources with those of other Program members, the impact on the recipient is much greater

Since Sundstrand employees would have a natural interest in supporting candidates who favor business and the free enterprise system, many Program members will contribute to the same campaigns. In addition, Program members will often choose to contribute to those candidates recommended by the Advisory Board

**Q. What kinds of activities does the Program sponsor?**

**A.** Program activities are organized at the local level, and vary greatly from one location to the next, but all locations do hold informative events. Examples include speeches and debates by political candidates, presentations by legislators or guest speakers familiar with relevant topics, breakfast meetings, fundraising dinners, voter registration drives — in short, anything that relates to the political activity in the area

**Q. Do I have to make political contributions?**

**A.** No. All contributions are voluntary and you have the right to refuse to contribute without any reprisal

3005332/0191

SUNDSTRAND  
GOOD  
GOVERNMENT  
PROGRAM 

# Check Request

Date \_\_\_\_\_

**Sundstrand Good Government Program  
Bradley J. Considine, Treasurer  
4949 Harrison Avenue, P.O. Box 7003  
Rockford, Illinois 61125**

I hereby authorize and direct you as Treasurer of the Sundstrand Good Government Program to draw a check from the funds accumulated in my account in the amount of \$\_\_\_\_\_ payable to

\_\_\_\_\_  
(Candidate or Committee)

\_\_\_\_\_  
(Title of Office)

\_\_\_\_\_  
(Address, if available)

Signature \_\_\_\_\_

Name (Print) \_\_\_\_\_

Social Security No \_\_\_\_\_

Division \_\_\_\_\_ Dept No \_\_\_\_\_

Address (if changed) \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

\_\_\_\_\_ Mail check directly to payee

\_\_\_\_\_ Return check to me at dept \_\_\_\_\_

**Political contributions do not qualify as charitable contributions for federal income tax purposes**

**Please note You have the right to refuse to contribute without reprisal Recommended contribution amounts are merely suggestions and you are free to contribute more or less than the guideline suggests The amount of your contribution or your refusal to contribute, will not be of benefit or disadvantage to you**

300501/0191

**Payroll Deduction Authorization**  
**Sundstrand Good Government Program**

Date \_\_\_\_\_

Payroll Department \_\_\_\_\_  
(Name of Operating Unit)

Please deduct \$ \_\_\_\_\_ from my earnings for 24 pay periods annually and transmit the amount to the American National Bank and Trust Co., Rockford, Illinois, as Depository. The Treasurer will disburse these amounts as instructed separately by me.

Please continue the deductions until revoked or revised by me by written notice.

Name (Type or Print) \_\_\_\_\_ Clock No. \_\_\_\_\_

Social Security No. \_\_\_\_\_ Dept. No. \_\_\_\_\_

Signature \_\_\_\_\_

Participation in the Program is completely voluntary and employees have the right to refuse to contribute without reprisal. Any contribution guidelines are merely suggestions. Individuals are free to contribute more or less than guidelines suggest. The amount of the contribution, or the refusal to contribute, will not benefit or disadvantage the solicitee.

300-499/0191

**SUNDSTRAND  
GOOD  
GOVERNMENT  
PROGRAM**



4949 HARRISON AVENUE, PO BOX 7003, ROCKFORD, ILLINOIS 61125 815/226-7674

**TO San Diego SGGP Members**

**March 26, 1991**

**FROM: Brad Considine, Treasurer**

**RE Congressman Duncan Hunter**

**The Advisory Board has approved a recommendation to support U S Rep Duncan Hunter.**

**Rep. Hunter was first elected to Congress in 1980 when he defeated Lionel Van Deerlin, an 18-year Democratic incumbent. The *Almanac of American Politics* describes Hunter as "a Vietnam veteran and a believer in strong national defense who brings the aggressiveness of a veteran of helicopter combat assaults in Vietnam and the brashness of a poverty lawyer to his work."**

**During our January Good Government meeting, Wendell Cutting from Congressman Hunter's office was our featured speaker and gave a dramatic presentation of life in the Middle East and an insightful view of the Persian Gulf conflict just before the U S launched Desert Storm.**

**Rep Hunter is a member of the House Armed Service Committee and the Select Committee on Hunger. He was a lead sponsor of using military forces to intercept drug shipments, worked to protect San Diego beaches by supporting a system to intercept sewage flows from Mexico, and led the fight against a homeporting plan which would take Navy ships out of San Diego. Sundstrand has developed a positive working relationship with his office and anticipates ongoing and open dialogue with the Congressman.**

**The Advisory Board offers the following guideline for contributions to Rep Hunter's committee: \$25 to \$30. If you agree with the Advisory Board, please complete the attached check request form and return it to my attention, Public Affairs, Department 948-3. Thank you**

***Contributions are for federal political purposes. Any contribution you make is voluntary and you have the right to refuse to contribute without any reprisal. You are free to contribute more or less than the guideline suggest and the corporation will not favor or disadvantage anyone by reason of their contribution or their decision not to contribute.***

**Check Request**

Date \_\_\_\_\_

**Sundstrand Good Government Program  
Bradley J Considine, Treasurer  
Dept 948-3  
4949 Harrison Avenue P.O. Box 7003  
Rockford, Illinois 61125-7003**

**I hereby authorize and direct you as Treasurer of the Sundstrand Good Government Program to draw a check from the funds accumulated in my account in the amount of \$\_\_\_\_\_ payable to**

**Committee to Re-elect Duncan Hunter**

**Signature** \_\_\_\_\_

**Name (Print)** \_\_\_\_\_

**Social Security Number** \_\_\_\_\_

**Division** \_\_\_\_\_

**Department Number** \_\_\_\_\_

**Political contributions do not qualify as charitable contributions for federal income tax purposes.**

**Please note: You have the right to refuse to contribute without reprisal. Recommended contribution amounts are merely suggestions and you are free to contribute more or less than the guideline suggests. The amount of your contribution or your refusal to contribute, will not be of benefit or disadvantage to you.**

# Legislative Alert

SUNDSTRAND PUBLIC AFFAIRS NEWSLETTER

TO. Sundstrand Good Government Pledge Program Members July 30, 1990  
FROM. Brad Considine, Treasurer   
RE Sundstrand Good Government Support Fund

A five-member committee to review and approve requests for contributions from the Sundstrand Good Government Support Fund has been selected to two-year terms. The move to establish the committee was made to increase input into decisions on contributions and to ensure that the Support Fund supports the overall mission of the Corporation.

The committee members include Bernie Weiss, Bud Wallin, Ron McKenna, Bill Teuscher and myself. Prior to the establishment of this committee, contributions from the Support Fund required only the approval of the PAC Chairman

The committee will authorize contributions from the Support Fund based primarily on the following criteria: the potential recipient's support of issues favorable to the Company, the need to support federal campaigns where we do not have regional plant support, the need for Sundstrand representatives to attend a political event, and the practicality of conducting a Pledge Program solicitation based on time constraints. The focus of Sundstrand's public affairs program will continue to be on the Pledge Program and promoting individual involvement in the political process.

With the establishment of the Support Fund Committee and the increasingly important forthcoming general election, the Pledge Program Advisory Board has authorized a request for contributions to replenish the Support Fund which has a current balance of \$990 52.

If you agree with the Advisory Board's recommendation, please complete and return the check request form on the reverse side of this memo or send a personal check payable to the Sundstrand Good Government Support Fund to the Public Affairs office, department 948-3 A \$20 contribution is recommended. If you have questions, please contact me at 815/226-7674 Thank you

\*\*\*

**SUNDSTRAND**

\*\*\*

**CHECK REQUEST**

DATE \_\_\_\_\_

**SUNDSTRAND GOOD GOVERNMENT PLEDGE PROGRAM**  
Bradley J Considine, Treasurer  
Dept 948-3  
4949 Harrison Avenue, P O Box 7003  
Rockford, Illinois 61125-7003

I hereby authorize and direct you as Treasurer of the Sundstrand Good Government Pledge Program to draw a check from the funds accumulated in my account in the amount of \$\_\_\_\_\_ payable to

**Sundstrand Good Government Support Fund**

SIGNATURE \_\_\_\_\_

NAME (PRINT) \_\_\_\_\_

SOCIAL SECURITY NUMBER \_\_\_\_\_

DIVISION \_\_\_\_\_

DEPARTMENT NUMBER \_\_\_\_\_

**Contributions do not qualify as charitable contributions for federal income tax purposes**

## **The Sundstrand Good Government Support Fund**

### **Operational Guidelines**

**The Sundstrand Corporation Good Government Support Fund is a political action committee affiliated with the Sundstrand Corporation Good Government Pledge Program. The purpose of the Support Fund and the Pledge Program is to make political contributions to elected officials, candidates and political organizations that represent the best interests of the Company and its employees**

**The Sundstrand Public Affairs department will focus its activities on the Pledge Program and encourage individual employee participation in the political process. Members of the Pledge Program will be encouraged to attend political activities and to make financial contributions to elected officials, candidates, and political organizations approved by an advisory board consisting of eight members. Members will also retain complete control over their Pledge Program account and are allowed to make political contributions as they choose**

**On occasion, Pledge Program members will be encouraged to contribute funds from their political action accounts to the Support Fund. The Support Fund will be used to make political contributions that support candidates from regions in which we do not have PAC members, complement Pledge Program contributions, and send necessary Company representatives to political events. The Support Fund would also be used when a solicitation of Pledge Program members is not practical due to time constraints. The decision to make contributions from the Support Fund will be made by a Support Fund committee consisting of five members. The Support Fund Committee will use the following guidelines when deciding on the disbursement of funds from the Support Fund**

- 1 Contributions may be made from the Support Fund only in situations where it is unreasonable due to time, lack of regional member support, or the nature of the contribution to solicit Pledge Program members to make individual contributions**
- 2 Contributions may be made from the Support Fund to permit Sundstrand representatives to attend political events considered important to the Company**
- 3 Every effort should be made to solicit Pledge Program members, or a select list of management, for contributions prior to using funds from the Support Fund**
- 4 No disbursement from the Support Fund shall be made without the approval of the Support Fund Committee. Approval requires support from at least three members of the Committee**
- 5 No disbursements shall be made from the Support Fund that is not in keeping with federal, state or local laws**
- 6 Contributions made from the Support Fund will be reported to all contributors on a quarterly basis**