



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1122

Date Filmed 10/2/79 Camera No. --- 2

Cameraman bpc

72040131282

38643104062

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:
Glen H. Nord, Treas.
2040 North Douglas Drive
Golden Valley, MN 55422

3 ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
543905

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Shirley Hietzel

4 DATE OF DELIVERY 9-20-79 SEP 20 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE

MINNEAPOLIS, MN 55401
SEP 20 1979
U.S. POST OFFICE

MUR-1022 - Tarrant



FEDERAL ELECTION COMMISSION

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

September 14, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Glen H. Nord, Treasurer
Robbinsdale Federation of
Teachers COPE Fund #2
2040 North Douglas Drive
Golden Valley, MN 55422

Re: MUR 1022

Dear Mr. Nord:

On September 13, 1979, based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission found reason to believe that you may have violated a provision of the Federal Election Campaign Act of 1971, as amended.

Specifically, it appears that your Committee violated 2 U.S.C. §441b and 11 C.F.R. §102.6 by accepting a transfer of \$3,539.00 from an account which contained union dues. However, after considering the circumstances in this matter, the Commission has determined that no further action should be taken. Accordingly, the file will be closed in this matter.

If you have any questions concerning this matter or if there is any relevant factual or legal materials you wish to submit for the public record, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4175 or our toll-free line (800) 424-9530.

Sincerely,

A handwritten signature in dark ink, appearing to read "William C. Oldaker", is written over a horizontal line.

William C. Oldaker
General Counsel

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Glen H. Nord, Treasurer
Robbinsdale Federation of
Teachers COPE Fund #2
2040 North Douglas Drive
Golden Valley, MN 55422

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Sincerely,

William C. Oldaker
General Counsel

MT
9/14/79

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Robbinsdale Federation of) MUR 1022
Teachers COPE Fund #2 -)
Golden Valley, MN)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 13, 1979, the Commission determined by a vote of 5-0 to adopt the following recommendations, as set forth in the First General Counsel's Report dated September 11, 1979, regarding the above-captioned matter:

1. Find REASON TO BELIEVE Fund #2 may have violated 2 U.S.C. §441b and 11 C.F.R. §102.6 and take no further action.
2. Close the file.
3. Send the letter attached to the above-named report.

Voting for this determination were Commissioners Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

9/14/79
Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 9-11-79, 10:53
Circulated on 48 hour vote basis: 9-11-79, 4:00

September 11, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1022

Please have the attached First GC Report on MUR 1022
distributed to the Commission on a 48 hour tally basis.

Thank you.

7 9 0 4 0 1 1 4 9 8 7

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION SEP 11 1979

MUR NO. 10223
STAFF MEMBER(S) AM-53

Tarrant

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: Robbinsdale Federation of Teachers COPE
Fund #2 - Golden Valley, MN

RELEVANT STATUTE: 2 U.S.C. §441b, 11 C.F.R. §102.6

INTERNAL REPORTS CHECKED: Robbinsdale Federation of Teachers COPE Fund #2

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

On August 27, 1979, the Robbinsdale Federation of Teachers COPE Fund #2 (Fund #2) was referred to the Office of General Counsel by the Reports Analysis Division (RAD) for accepting funds from a commingled state account, in violation of 2 U.S.C. §441b and 11 C.F.R. §102.6.

EVIDENCE

On its first report, which covered January 1, 1978 to October 2, 1978, Fund #2 reported receiving a transfer of \$3,539.00 from the Robbinsdale Federation of Teachers COPE Fund #1 (Fund #1). This prompted the sending of a surface violation letter to Fund #1, which advised them they may be considered a political committee under the Act.

In response, Glen Nord, treasurer of Fund #2, responded by phone and by letter dated February 9, 1979. Mr. Nord explained that Fund #1 had been set up prior to Fund #2 for the purpose of collecting contributions for state and local campaigns. When a fund drive was held in the fall of 1977, \$3,539.00 was collected and deposited into Fund #1, which also contained some union dues. As this \$3,539.00 consisted of all voluntary contributions, this money was transferred over to Fund #2 when it was established. Subsequently, all voluntary contributions were placed in Fund #2 and funds transferred to Fund #1 as needed.

Upon advice from RAD, Fund #2 wrote to all the federal political committees and/or candidates they had contributed to and requested refunds. Mr. Nord was later informed by RAD that his committee need only request refunds from the Martin Sabo for Congress Volunteers and the American Federation of Teachers COPE Fund as it appeared these two committees were the only recipients of commingled funds.

On April 13, 1979, Fund #2 terminated, disclosing on its last report refunds from the above mentioned committees. Residual funds were transferred to Fund #1.

PRELIMINARY ANALYSIS

2 U.S.C. §441b prohibits labor organizations from making a contribution in connection with any federal election and the acceptance of such a contribution. For purposes of this prohibition the term contribution is defined to include any "indirect payment" which would be the situation here due to Fund #1's commingling of funds.

In addition, 11 C.F.R. §102.6 prohibits a political committee from accepting transfers from an account which contains funds not permissible under the Act.

Therefore, the Office of General Counsel recommends the Commission find reason to believe Fund #2 violated 2 U.S.C. §441b and 11 C.F.R. §102.6.

However, in light of the fact that the \$3,539.00, the amount of the transfer, was also the amount of the voluntary contributions collected; and considering that the only two federal committees which received contributions from the commingled funds refunded those amounts, this office recommends no further action be taken against Fund #2.

RECOMMENDATION

1. Find reason to believe Fund #2 may have violated 2 U.S.C. §441b and 11 C.F.R. §102.6 and take no further action.
2. Close the file.
3. Send the attached letter.

ATTACHMENTS

1. Referral from RAD
2. Proposed letter

790401:4989

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

MUR 1022

DATE

August 27, 1979

ANALYST

Beverly Brown BB

TO: William C. Oldaker

TEAM CHIEF

Steve Hims

THROUGH: STAFF DIRECTOR

RL for AAF

COMPLIANCE REVIEW

Carroll Bowen CB

FROM:

ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

Attachment 1

CANDIDATE/COMMITTEE:

Robbinsdale Federation of Teachers COPE Fund #2

TREASURER:

Mr. Glen H. Nord

ADDRESS:

2040 North Douglas Drive
Golden Valley, MN 55422

AFFILIATE(S):

ALLEGATION(S):

CITE:

ATTACHMENT(S)

Receipt of co-mingled
Funds from state account

2 U.S.C. 441b

#2

11CFR 102.6

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE:

Normal review initiated on 1/30/79

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 1/1/78

TO 10/2/78

TOTAL RECEIPTS \$ 3604

TOTAL EXPENDITURES \$ 3512

CASH ON HAND \$ 91

DEBTS \$ 0

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

Informational letter/ Surface Violation Notice sent 1/30/79
Response received on 2/6/79

#3

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Telecon 2/5/79

#3

Telecon after receipt of committee response

REASON(S) FOR REFERRAL:

ATTACHMENT

See above allegations

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None

OTHER RELEVANT INFORMATION:

The committee discloses a refund of contributions (co-mingled funds) transferred to the American Federation of Teachers COPE Fund and the Martin Sabo for Congress Volunteers. The Robbinsdale Federation of Teachers COPE Fund #2 terminated on 4/13/79. Residual funds were transferred to their state account.

#4

7 9 0 4 0 1 5 4 9 9 1

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)DATE 24APR79
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
ROBBINSDALE FEDERATION OF TEACHERS COPE FUND #2								ID# C00103960
	CONNECTED ORGANIZATION: TEACHERS; AMERICAN FEDERATION OF							
	1978 STATEMENT OF ORGANIZATION					29SEP78	4	78FEC/086/1902
	1979 MISCELLANEOUS TRANSACTION FROM F.E.C.					30JAN79	4	79FEC/118/3689
	MISCELLANEOUS TRANSACTION FROM F.E.C.					30JAN79	2	79FEC/118/3696
	MISCELLANEOUS TRANSACTION TO F.E.C.					13FEB79	6	79FEC/120/3259
1978	30 DAY POST-PRIMARY	3,604		3,512		1JAN78 - 20CT78	6	78FEC/090/0384
	10 DAY PRE-GENERAL	2,446		600		30CT78 - 23OCT78	4	78FEC/092/5135
	30 DAY POST-GENERAL	1,004		0		24OCT78 - 27NOV78	3	78FEC/099/1032
	YEAR END REPORT	175		0		28NOV78 - 31DEC78	3	79FEC/118/3502
1979	APRIL 10 QUARTERLY - TERMINATED	1,195		4,311		1JAN79 - 31MAR79	6	79FEC/124/4690
	TOTAL	8,424	0	8,423	0		38	TOTAL PAGES
TERMINATED								

ALL REPORTS HAVE BEEN REVIEWED

1

REPORT OF RECEIPTS AND EXPENDITURES
FOR A CANDIDATE OR COMMITTEE
SUPPORTING CANDIDATE(S) FOR
NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

0004 2

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. *0004 Form #2*

1 Robt. H. Federation of Teachers 2 I.D. No. C00103960
Name of Candidate or Committee (in full) Candidate/Committee
2410 North Douglas Drive
Address (number and street)
Golden Valley, Minn. 55425
City, State and ZIP Code ☐ Check if address is different than previously reported. Year of Election 1978

4 Type of Report (check appropriate boxes)

- ☐ April 10 Quarterly Report ☐ Tenth day report preceding _____ election
(primary, general or convention) ☐ Termination Report
☐ July 10 Quarterly Report on _____ in the State of _____
(date) ☐ Amendment for: _____
☐ October 10 Quarterly Report ☒ Thirtieth day report following Primary election
(primary, general or convention) (which report) _____
☐ January 31 Annual Report ☐ Monthly Report _____ on _____ in the State of _____
(month) (date)
This is a report for ☐ Primary Election ☐ General Election ☐ Primary and General ☐ Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES
(Figures may be rounded to nearest dollar.)

5 Covering Period _____ Through _____	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19 _____		\$.00
7 Cash on hand at beginning of reporting period _____	\$.00	
8 Total receipts (from line 19) _____	\$ 3,604.00	\$ 3,604.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B) _____	\$ 3,604.00	\$ 3,604.00
9 Total expenditures (from line 25) _____	\$ 3,512.77	\$ 3,512.77
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a) _____	\$ 91.23	\$ 91.23
11 Value of contributed items on hand to be liquidated (Attach itemized list) _____ \$ _____		
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C) _____	\$.00	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C) _____	\$.00	

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

Oct 11, 1978
(Date)

Glen H. Ford
(Typed Name of Treasurer or Candidate)

Glen H. Ford
(Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441j (see reverse side of form).

For further
information,
Contact:

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

or call 800/424-9530

Approved by GAO
B-187620 (R0506)
Expires 3-31-81

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

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

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE *Port Land H J*
Albionville Federation of Teachers

REPORT COVERING THE PERIOD
FROM: *Jan. 1, 1975* TO: *Oct. 1, 1975*

RECEIPTS

Column A
This Period

Column B
Calendar Year-To-Date

14. Contributions from Individuals (including contributions in-kind):		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$ <i>65.00</i>	
(c) Sales and collections included above:		
List by event on memo Schedule D (\$)		
(d) Subtotal of contributions from individuals	\$	\$ <i>65.00</i>
15. Transfers from Political Committees:		
(a) Funds from affiliated/authorized committee (Itemize on Schedule A regardless of amount)	\$ <i>3,539.00</i>	
(b) Funds from other committees (Itemize on Schedule A regardless of amount)	\$	
(c) Contributions in-kind from political committees (Itemize on Schedule A regardless of amount)	\$	
(d) Subtotal of transfers in and contributions in-kind from political committees	\$ <i>3,539.00</i>	\$ <i>3,539.00</i>
16. Other Income:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of other income	\$	\$
17. Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments received	\$ <i>3,604.00</i>	\$ <i>3,604.00</i>
18. Refunds, Rebates, Returns of Deposits:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of refunds, rebates, returns of deposits	\$	\$
19. Total Receipts	\$ <i>3,604.00</i>	\$ <i>3,604.00</i>

EXPENDITURES

20. Operating Expenditures:		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$ <i>13.40</i>	
(c) Subtotal of operating expenditures	\$	\$ <i>13.40</i>
21. Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments made and contribution refunds	\$ <i>.00</i>	\$ <i>.00</i>
22. Transfers Out to Political Committees:		
(a) To affiliated/authorized committee (Itemize on Schedule B regardless of amount)	\$ <i>3,499.37</i>	
(b) To other committees (Itemize on Schedule B regardless of amount)	\$ <i>50.00</i>	
(c) Contributions in-kind to other committees (Itemize on Schedule B regardless of amount)	\$ <i>.00</i>	
(d) Subtotal of transfers out	\$ <i>3,499.37</i>	\$ <i>3,499.37</i>
23. Independent Expenditures (use Schedule E)	\$ <i>.00</i>	\$ <i>.00</i>
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (Itemize on Schedule F)	\$ <i>.00</i>	\$ <i>.00</i>
25. Total Expenditures	\$ <i>3,512.77</i>	\$ <i>3,512.77</i>

**RECEIPTS AND EXPENDITURES,
NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES**

26. Total Receipts (from line 19)	\$ <i>3,604.00</i>	
27. Transfers In (from line 15(d))	\$ <i>3,539.00</i>	
28. Net Receipts (Subtract line 27 from line 26)	\$ <i>65.00</i>	
29. Total Expenditures (from line 25)	\$ <i>3,512.77</i>	
30. Transfers Out (from line 22(d))	\$ <i>3,499.37</i>	
31. Net Expenditures (Subtract line 30 from line 29)	\$ <i>13.40</i>	

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 1 of 1 for

Line Number 15 a.

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

Rebbinsdale Federation of Teachers (CPE Fund # 2)

Full Name, Mailing Address and ZIP Code

*Rebbinsdale Federation of
Teachers CPE Fund # 1
2040 Martin Douglas Drive
Golden Valley, Minn 55427*

Principal Place of Business

Occupation

Date (month,
day, year)

1/25/78

Amount of each Receipt
this Period

\$3,539.00

Receipt for

☒ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each Receipt
this Period

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each Receipt
this Period

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each Receipt
this Period

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each Receipt
this Period

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each Receipt
this Period

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each Receipt
this Period

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

SUBTOTAL of receipts this page (optional)

\$

TOTAL this period (last page this line number only)

\$3,539.00

790000154994

SCHEDULE B

REVISED

January, 1978

Federal Election Commission

25 K Street, N.W.

Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page 1 of 1 for
Line Number 22b.

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

Robbinsdale Federation of Teachers (COPE Fund #2)

Full Name, Mailing Address and ZIP Code

*Martin Sabe
3129 E. 22nd Street
Minneapolis, Minn. 55406
C-1 26722*

Particulars of Expenditure

*Contribution to Sabe
for Congress Fund Raiser*

Date (month,
day, year)

9/17/78

Amount of each expendi-
ture this period

\$ 50.00

Expenditure for:

☐ Primary ☒ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

SUBTOTAL of expenditures this page (optional)

\$

TOTAL this period (last page this line number only)

\$ *50.00*

7 200-101-9149-33-7

SCHEDULE B

REVISED

January, 1978

Federal Election Commission

125 K Street, N.W.

Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page 1 of 1 for

Line Number 22 a.

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

Robbinsdale Federation of Teachers COPE Fund #2

Full Name, Mailing Address and ZIP Code
*16 American Federation of Teachers COPE Fund
11 Dupont Circle N.W.
Washington D.C. 20036*

Particulars of Expenditure
a Contribution to our Parent organization

Date (month, day, year)
4/14/78

Amount of each expenditure this period
\$1000.00

Expenditure for:
☒ Primary ☐ General ☒ Other

Full Name, Mailing Address and ZIP Code
*Robbinsdale Federation of Teachers COPE Fund #1
2040 North Douglas Drive
Golden Valley Minn. 55428*

Particulars of Expenditure
Transfer of funds to our RFT COPE Minnesota "State" Fund

Date (month, day, year)
4/21/78

Amount of each expenditure this period
\$2,449.37

Expenditure for:
☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Expenditure for:
☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Expenditure for:
☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Expenditure for:
☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Expenditure for:
☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Expenditure for:
☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Expenditure for:
☐ Primary ☐ General ☐ Other

SUBTOTAL of expenditures this page (optional)

\$

TOTAL this period (last page this line number only)

\$

7 2 2 0 9 6 0 2 1 0 3 4 9 9 6 1



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

3

INFORMATIONAL NOTICE

Mr. Glen H. Nord, Treasurer
Robbinsdale Federation of Teachers COPE Fund #2
2040 North Douglas Drive
Golden Valley, Minnesota 55422

January 30, 1979

Dear Mr. Nord:

During review of the following Report(s) of Receipts and Expenditures:

30 Day Post General

we noticed that you may have received funds in excess of \$1,000 from an organization(s) which is not registered under the Act as a political committee.

For your information, we are attaching a copy of our letter to this organization listed as the source of the funds. Since they are being given the opportunity to bring themselves into compliance as a registered political committee, you may wish to consult with the organization.

If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. If you have any questions, please contact James B. Brown, our Reports Analyst assigned to you, at (800)424-9530. Our local numbers are (202)523-4172(House) and (202)523-4048(Senate).

79071027 73141909 7337



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

January 30, 1979

Treasurer
Robbinsdale Federation of Teachers COPE #1
2040 North Douglas Drive
Golden Valley, Minnesota 55422

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. Our review of the receipts reported by other political committees indicates that your organization may have contributed in excess of \$1,000 to a committee that supports Federal candidates. Attached is a copy of the report in which this contribution was listed.

The Act defines "political committee" to mean any committee, club, association, or other group of persons which receives contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year for the purpose of influencing Federal elections. Transfers of funds to political committees which support Federal candidates are considered "expenditures." The Act further precludes such a political committee from making contributions in excess of \$1,000 per Federal candidate per election unless and until the committee can qualify as a multicandidate committee, in which case it can give up to \$5,000 per candidate per election. The Act defines a multicandidate committee as one which has been registered for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office.

It would appear that your organization may qualify as a "political committee" under the Act, subject to the registration and reporting requirements of the law, as well as the contribution limitations.

Enclosed are relevant informational materials with regard to the Federal Election Campaign Act, including the appropriate forms for registration and reporting by political committees. Please examine these materials and:

- 1) if you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1 within fifteen (15) days of receipt of this letter. In addition, your committee will be required to file disclosure reports in accordance with the provisions of 2 U.S.C. 434 on FEC Form 3. You must, however, request a refund of the amount of your contribution in excess of \$1,000 from the candidate or political committee because you cannot qualify at this time as a multicandidate committee.

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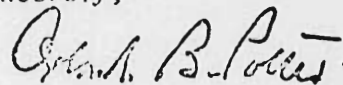
Your contribution of \$1,000 is permissible under the Act only if it was from monies which are legally permissible (i.e. not funds emanating from corporate or union treasuries), and only if the donors are informed that their contributions are to be used to influence federal elections. Please submit a statement concerning these matters within fifteen (15) days of receipt of this letter. Refunds must be reported as receipts on the forms provided, and disclosed on the report due after date of receipt.

- 2) if you agree that your organization had made contributions which qualify it to be a political committee (as defined above), but you do not wish to be considered a political committee required to file reports and statements as required by 2 U.S.C. 433 and 434, you must request refund(s) from the candidate(s) or political committee(s) of contributions aggregating in excess of \$1,000 in the calendar year. Please submit a statement to this effect within fifteen (15) days of receipt of this letter.
- 3) if you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement within fifteen (15) days of receipt of this letter which would clarify this matter for the public record.

By separate letter we are notifying the committee whose report is attached, advising it to be in contact with you before taking any corrective action on its own behalf.

Please notify the Commission within fifteen (15) days of receipt of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact James B. Brown (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is (202)523-4048.

Sincerely,



Orlando B. Potter
Staff Director

Enclosure

Certified Mail:
Return Receipt Requested

TELECON FOR THE FILE

ROBBINSDALE FEDERATION OF TEACHERS COPE FUND #2

C00103960

(Full Name Of Committee)

(Identification Number)

Beverly Brown

(Name of Analyst)

Mr. Glen Nord - Treasurer

(Committee Contact)

DATE/TIME: 2/5/79 10:30 A.M.

IN REFERENCE TO: 2SV1/78-210

PHONE NUMBER: (612) 533-7782

REMARKS:

Background: In their 30 Day Post General Election report of receipts and expenditures, the Robbinsdale Federation of Teachers COPE Fund #2 disclosed a transfer in of \$3539 from the Robbinsdale Federation of Teachers COPE Fund #1. The Reports Analysis Division sent a surface violation letter to the Robbinsdale Federation of Teachers COPE Fund #1 stating that the organization may have been in violation of 2 U.S.C. 433 (failure to register as a political committee. In addition, in accordance with former procedures, an informational letter was sent to the Robbinsdale Federation of Teachers COPE Fund #2. This letter informed Fund #2 that they had received contributions in excess of \$1000 from an unregistered entity and advised the committee to determine whether or not the source of funds received from Fund #1 were prohibited by 2 U.S.C. 441a.

Mr. Glen Nord, treasurer of the Robbinsdale Federation of Teachers COPE Fund #2, called in response to the Commission's surface violation notice. Mr. Nord stated the Fund #1 was set up prior to Fund #2 to collect contributions for State and local campaigns. A fund Drive had been held in 1978 and from that Drive the committee had deposited \$3539 of voluntary contributions into Fund #1. Later, when Fund #2 was established and registered with the Federal Election Commission, the \$3539 was transferred over from Fund #1. It was the understanding at the time that since the \$3539 represented voluntary contributions, the committee would not be prohibited from transferring the funds to their separate segregated fund (Fund #2.).

Asked if Fund #1 had at any time contained other than voluntary contributions, Mr. Nord stated that union dues had been deposited into Fund #1 since state law did not prohibit the comingling of funds. I informed Mr. Nord that since the voluntary contributions from the drive had been deposited into a comingled account, they too would be considered to be comingled funds. In addition, since comingled funds had been deposited into Fund #2, Fund #2 would be considered to contain tainted monies. Furthermore, since the committee had transferred comingled funds to candidates and committees, the candidates and committees would also be in violation of the act for having received prohibited funds.

Asked how Fund #2 might go about reconciling the situation, I advised Mr. Nord to request refunds from all candidates and committees who had received contributions during the 30 Day Post General period. In turn, these funds should be deposited into Fund #2 and immediately transferred over to Fund #1. Fund #2 should disclose all transactions

taking place with regard to this matter. Furthermore, the committee should immediately respond to the Commission's surface violation letter by informing the Commission of 1) the source of funds transferred from Fund #1 to Fund #2 2) any misunderstanding regarding the prohibitions of transferring these funds 3) all action to be taken by the committee in order to reconcile the situation. This information should be forwarded to the Commission in written form. Any additional evidence of their attempts to comply with the Act (eg. copies of letters to be sent to candidates asking for a refund of contributions) would be beneficial.

Mr. Nord asked for a repitition of my advice and stated that the information would be forwarded as soon as possible.

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ROBBINSDALE FEDERATION of TEACHERS

February 9, 1979

TO: Beverly Brown, Federal Elections Commission
FROM: Glen Nord, RFT COPE Treasurer

HISTORY & SOURCE OF FUNDS: On February 25, 1978, the Robbinsdale Federation of Teachers (RFT) established a fund entitled, Robbinsdale Federation of Teachers COPE Fund #2, hereinafter referred to as RFT COPE Fund #2, which was designed to comply with the requirements of the Federal Elections Commission.

For a number of year the RFT had possessed another fund entitled, RFT COPE Fund, hereinafter referred to as RFT COPE Fund #1 from which it made contributions to local and state candidates. This original fund did contain some dues money. Because the RFT COPE Fund #2 was not set up until after our 1977 fund drive, we transferred from the RFT COPE Fund #1 to the RFT COPE Fund #2, \$3,539.00 which we could document as constituting voluntary contributions from our 1977 collections. During the fall drive of 1978, we placed the entire amount of our voluntary collections in our RFT COPE Fund #2 and transferred funds by check to RFT COPE Fund #1 as needed to support local and state candidates.

We were informed by Orlando Potter of the Federal Elections Commission in a letter dated January 30, 1979, that our transfer of \$3,539.00 from RFT COPE Fund #1 to RFT COPE Fund #2 was improper because the money had been co-mingled with dues money. We were further informed that the RFT must request from each federal candidate to whom we sent money a return of the same amount.

HOW WE PLAN TO CORRECT THE PROBLEM: We have requested from each federal candidate and the American Federation of Teachers (see enclosed letters) a return of all 1978 contributions we had made. Once this money is returned, we will write a check from RFT COPE Fund #2 to RFT COPE Fund #1 for the total amount of money in RFT COPE Fund #2. This will be somewhat less than \$3,539.00 because during 1978, we have written checks from RFT COPE Fund #2 to RFT COPE Fund #1. This was necessary because RFT COPE Fund #1 is registered with the State of Minnesota in compliance with its Fair Campaign Practices Act. We must then write checks from RFT COPE Fund #1 to the volunteer committees of state and local candidates. RFT COPE Fund #2 will remain in existence with a balance of zero dollars until we again obtain voluntary funds in the fall of 1979.

QUESTION: Since we would like to reimburse the federal candidates and the American Federation of Teachers, from whom we have had to request a return of our 1978 contributions, would it be proper to borrow money from a bank, after we have zeroed the RFT COPE Fund #2, repay the federal candidates from these borrowed funds, and then in November of 1979, after we complete our drive for voluntary funds, pay off the bank loan from RFT COPE Fund #2?

cc: Roger Peterson, Attorney
Sandy Peterson, RFT Pres.
Lois Wendt, RFT COPE Chair.

ROBBINSDALE FEDERATION of TEACHERS

February 6, 1979

Ms. Elaine Kienitz, Treasurer
Martin Sabo Volunteer Committee
4920 Elliot Avenue South
Minneapolis, Mn. 55417

Dear Ms. Kienitz:

We have been required by the Federal Election Commission to request from you the return of \$50.00 which is the amount of money the RFT contributed to Mr. Sabo's 1978 election campaign.

Though the funds used for this purpose were all obtained from voluntary contributions they were, according to the Commission, co-mingled with dues money. We had used legal advice in setting up a special fund for Federal contributions, but because of a technicality violated one of the Commission rules.

We certainly feel obligated to return to your campaign committee the \$50.00 once the Federal Elections Commission declares our COPE fund number 2, which is designated for Federal contributions, to be pure. Unfortunately, this may take over a year. All COPE monies presently collected, according to the Commission, are contaminated and we will have to wait until the completion of the 1979 fall drive before we will have pure money to honor our commitment.

We are very sorry for this inconvenience, but have no alternative but to comply.

Sincerely yours,

Dan
Harry K. Honek
Executive Secretary

ROBBINSDALE FEDERATION of TEACHERS

February 6, 1979

Ms. Rachelle Harowitz
AFT/COPE Director
11 Dupont Circle N.W.
Washington, D. C. 20036

Dear Rachelle:

We have been required by the Federal Election Commission to request from you the return of \$1,000 which is the amount of money the Robbinsdale Federation of Teachers contributed to your 1978 AFT/COPE.

Though the funds used for this purpose were all obtained from voluntary contributions they were, according to the Commission, co-mingled with dues money. We had used legal advice in setting up a special fund for Federal contributions but because of a technicality violated one of the Commission rules.

We certainly feel obligated to return to your AFT/COPE fund the \$1,000 once the Federal Elections Commission declares our COPE fund number 2, which is designated for Federal contributions, to be pure. Unfortunately, this may take over a year. All COPE monies presently collected, according to the Commission, are contaminated and we will have to wait until the completion of the 1979 fall drive before we will have pure money to honor our commitment.

We are sorry for this inconvenience, but have no alternative but to comply.

Sincerely yours,

Barry K. Nowak
Barry K. Nowak
Executive Secretary

ROBBINSDALE FEDERATION of TEACHERS

February 6, 1979

Mr. Michael Freeman
5342 Excelsior Boulevard
St. Louis Park, Minn. 55426

Dear Mike:

We have been required by the Federal Election Commission to request from you the return of \$350.00 which is the amount of money the RFT contributed to your 1978 campaign.

Though the funds used for this purpose were all obtain from voluntary contributions they were, according to the Commission, co-mingled with dues money. We had used legal advice in setting up a special fund for Federal contributions but because of a technicality violated one of the Commission rules.

We certainly feel obligated to return to your campaign committee the \$350.00 once the Federal Elections Commission declares our COPE fund number 2, which is designated for Federal contributions, to be pure. Unfortunately, this may take over a year. All COPE monies presently collected, according to the Commission, are contaminated and we will have to wait until the completion of the 1979 fall drive before we will have pure money to honor our commitment.

We are sorry for this inconvenience, but have no alternative but to comply.

Sincerely yours,

Barry K. Roach
Barry K. Roach
Executive Secretary

ROBBINSDALE FEDERATION of TEACHERS

February 6, 1979

Mr. Gerald Dillon
Donald Fraser Campaign Treasurer
500 So. 3rd St.
Minneapolis, Mn. 55417

Dear Mr. Dillon:

We have been required by the Federal Election Commission to request from you the return of \$250.00 which is the amount of money the RFT contributed to your 1978 election campaign.

Though the funds used for this purpose were all obtained from voluntary contributions they were, according to the Commission, co-mingled with dues money. We had used legal advice in setting up a special fund for Federal contributions, but because of a technicality violated one of the Commission rules.

We certainly feel obligated to return to your campaign committee the \$250.00 once the Federal Elections Commission declares our COPE number 2 fund, which is designated for Federal contributions, to be pure. Unfortunately, this may take over a year. All COPE monies presently collected, according to the Commission, are contaminated and we will have to wait until the completion of the 1979 fall drive before we will have pure money to honor our commitment.

Sincerely yours,

Barry K. Noack
Barry K. Noack
Executive Secretary

72040135006

TELECON

TO: THE FILE

FROM: BEVERLY BROWN

CONCERNING: ROBBINSDALE FEDERATION OF TEACHERS COPE FUND #2

COMMITTEE CONTACT: GLEN NORD

After receiving the committee's response to an informational notice from the Commission, I called Mr. Nord to inform him that the committee need only request refunds from Martin Sabo and the American Federation of Teachers Cope Fund. It appeared that these candidates/committees were the only recipients of co-mingled funds from their state account. The remaining committees, mentioned in his letter of 2/6/79, apparently received voluntary contributions.

Funds received from Fund #1..... , \$3539

Funds transferred out during
same reporting period..... \$3499

Fund #1.....	(\$2449)
Martin Sabo.....	(50)
AFT COPE.....	(1000)
Total	\$3499

Difference

\$40 - May still be held in their
closing cash on hand

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RECEIVED
FEDERAL ELECTION
COMMISSION

APR 10 12 58 11-43

April 10, 1979
Robbinsdale Federation of Teachers
COPE Fund #2
2040 North Douglas Drive
Golden Valley, Minn. 55422

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

Gentlemen:

I would like to inform you that our committee, the Robbinsdale Federation of Teachers COPE Fund #2, intends to terminate our fund.

We transferred our cash balance to our state and local fund, which we call the Robbinsdale Federation of Teachers COPE Fund #1. We presently, therefore, have a zero balance in our RFT COPE Fund #2 account.

Would you please send us notice that you have received our termination notice and that our committee is terminated. Thank you.

Sincerely,

Glen H. Nord

Glen H. Nord.
Treasurer

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7901013590

FEC FORM 3
REVISED
 January 1979
 Federal Election Commission
 1125 K Street, N.W.
 Washington, D.C. 20005

**REPORT OF RECEIPTS AND EXPENDITURES
 FOR A CANDIDATE OR COMMITTEE
 SUPPORTING CANDIDATE(S) FOR
 NOMINATION OR ELECTION TO FEDERAL OFFICE**
 (Except for Candidates or Committees Receiving Federal Matching Funds)

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

1. **Robbinsdale Federation of Teachers COPE Fund #2** 2. **1979** 3. **000103960**
 Name of Candidate or Committee (in full) Candidate Committee
2040 North Douglas Drive
 Address (number and street) 4. **Golden Valley, Minn. 55422**
 Address (number and street) City, State and ZIP Code
 City, State and ZIP Code **Minn. 55422** ☐ Check if address is different than previously reported
 Year of Election
 4. Type of report (check appropriate box)
☒ **April 15 Quarterly Report** ☐ **Tenth-day report (placed in mail by the 10th day of the month)** ☒ **Termination Report**
☐ **July 15 Quarterly Report** ☐ **On or after the 15th day of the month** ☐ **Annual report**
☐ **October 15 Quarterly Report** ☐ **On or after the 15th day of the month** ☐ **Annual report**
☐ **January 31 Annual Report** ☐ **On or after the 31st day of the month** ☐ **Annual report**
☐ **Monthly Report** ☐ **On or after the 15th day of the month** ☐ **Annual report**
 This is a report for: ☐ Primary Election ☐ General Election ☐ Primary and General ☐ Other

SUMMARY OF RECEIPTS AND EXPENDITURES
 (Figures may be rounded to nearest dollar)

	Column A This Period	Column B Calendar Year To Date
5. Covering Period Jan. 1, 1979 Through Mar. 31, 1979		
6. Cash on hand January 1, 1979		\$.00
7. Cash on hand at beginning of reporting period	\$ 3,215.57	
8. Total receipts (from line 19)	\$ 1,295.00	\$ 8,424.34
9. Total expenditures (from line 25)	\$ 4,311.57	\$ 8,424.34
10. Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$.00	\$.00
11. Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$.00	\$.00
12. Total contributions owed to the Committee (Candidate) (from line 19)	\$.00	
13. Total contributions owed by the Committee (Candidate) (from line 25)	\$.00	

I certify that I have examined this Report and to the best of my knowledge and belief it is true and correct.
4/10/79 **Glen H. Nord**
 Date Printed Name of Treasurer or Candidate Signature of Treasurer or Candidate

Note: Submission of false, erroneous, or incomplete information may subject the person submitting the report to the penalties of 2 U.S.C. Section 4371.

For further information, contact: Federal Election Commission, 1125 K Street, N.W., Washington, D.C. 20005. (202) 424-9610. Approved by: 11/18/79 (100-291) (Rev. 1-21-79)

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

4. This report must be filed with the Federal Election Commission by the date specified on the report.

179040135009

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE		REPORT COVERING THE PERIOD	
		FROM:	TO:
RECEIPTS		Column A This Period	Column B Calendar Year To Date
14	Contributions from individuals (including contributions in kind)		
	(a) Itemized (use Schedule A)	\$.00	
	(b) Unitemized	\$ 145.00	
	(c) Subtotal of contributions included above	\$ 145.00	
	List by event on memo Schedule D: \$.00		
	(d) Subtotal of contributions from individuals	\$ 145.00	\$ 3,835.34
15	Transfers from Political Committees		
	(a) Funds from affiliated authorized committee (itemize on Schedule A regardless of amount)	\$.00	
	(b) Funds from other committees (itemize on Schedule A regardless of amount)	\$ 1,050.00	
	(c) Contributions in kind from political committees (itemize on Schedule A regardless of amount)	\$.00	
	(d) Subtotal of transfers in kind and contributions in kind from political committees	\$ 1,050.00	\$ 4,589.00
16	Other Income		
	(a) Itemized (use Schedule A)	\$.00	
	(b) Unitemized	\$.00	
	(c) Subtotal of other income	\$.00	\$.00
17	Loans and Loan Repayments Received		
	(a) Itemized (use Schedule A)	\$.00	
	(b) Unitemized	\$.00	
	(c) Subtotal of loans and loan repayments received	\$.00	\$.00
18	Refunds, Rebates, Returns of Deposits		
	(a) Itemized (use Schedule A)	\$.00	
	(b) Unitemized	\$.00	
	(c) Subtotal of refunds, rebates, returns of deposits	\$.00	\$.00
19	Total Receipts	\$ 1,195.00	\$ 8,424.34
EXPENDITURES			
20	Operating Expenditures		
	(a) Itemized (use Schedule B)	\$.00	
	(b) Unitemized	\$.00	
	(c) Subtotal of operating expenditures	\$.00	\$ 23.40
21	Loans, Loan Repayments, and Contribution Refunds Made		
	(a) Itemized (use Schedule B)	\$.00	
	(b) Unitemized	\$.00	
	(c) Subtotal of loans and loan repayments made and contribution refunds	\$.00	\$.00
22	Transfers Out to Political Committees		
	(a) To affiliated authorized committee (itemize on Schedule B regardless of amount)	\$ 4,311.57	
	(b) To other committees (itemize on Schedule B regardless of amount)	\$.00	
	(c) Contributions in kind to other committees (itemize on Schedule B regardless of amount)	\$.00	
	(d) Subtotal of transfers out	\$ 4,311.57	\$ 4,311.57
23	Independent Expenditures (use Schedule E)	\$.00	\$.00
24	Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F)	\$.00	\$.00
25	Total Expenditures	\$ 4,311.57	\$ 4,311.57
RECEIPTS AND EXPENDITURES NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26	Total Receipts from (a) (1)	\$ 1,195.00	
27	Transfers in from (a) (1)	\$.00	
28	Net Receipts (Subtract line 27 from line 26)	\$ 1,195.00	
29	Total Expenditures from line 25	\$ 4,311.57	
30	Transfers out from line 22 (a) (1)	\$ 4,311.57	
31	Net Expenditures (Subtract line 30 from line 29)	\$.00	

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**SCHEDULE A
REVISED**

January 1978
Federal Election Commission
1125 K Street, N.W.
Washington, D.C. 20461

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page **1** of **1** for
Line Number **15 b.**

(Use Separate Schedules for
each numbered line.)

Name of Candidate or Committee in Full

Robbinsdale Federation of Teachers COPE Fund #2

Full Name, Mailing Address and ZIP Code

**American Federation of Teachers
COPE Fund, 11 Durant Circle N.W.
Washington, D.C. 20036**

Primary Place of Business

Same as address

Date received
day, month, year

Amount received
in full

3/7/79 1,000.00

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check ☐ Cash ☐ Other
Appropriate Year To Date \$ **1,000.00**

Primary Place of Business

Full Name, Mailing Address and ZIP Code

**Martin Sabo for Congress Volunteers
3129 E. 32nd Street
Minneapolis, Minn. 55406**

Date received day, month, year

3/7/79 50.00

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check ☐ Cash ☐ Other
Appropriate Year To Date \$ **50.00**

Primary Place of Business

Full Name, Mailing Address and ZIP Code

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check ☐ Cash ☐ Other
Appropriate Year To Date \$

Primary Place of Business

Full Name, Mailing Address and ZIP Code

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check ☐ Cash ☐ Other
Appropriate Year To Date \$

Primary Place of Business

Full Name, Mailing Address and ZIP Code

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check ☐ Cash ☐ Other
Appropriate Year To Date \$

Primary Place of Business

Full Name, Mailing Address and ZIP Code

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check ☐ Cash ☐ Other
Appropriate Year To Date \$

Primary Place of Business

Full Name, Mailing Address and ZIP Code

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check ☐ Cash ☐ Other
Appropriate Year To Date \$

Primary Place of Business

Full Name, Mailing Address and ZIP Code

SUBTOTAL

\$ 1,050.00

TOTAL

\$ 1,050.00

79010135011

SCHEDULE B

REVISED

January 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20543

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind,
Loans, Loan Repayments and Refunds Made)

Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page 1 of 1 for

Line Number 22

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

Robbinsdale Federation of Teachers COPE Fund #2

Full Name, Mailing Address and ZIP Code Robbinsdale Federation of Teachers COPE Fund #1, 2040 North Douglas Drive, Golden Valley, Minn. 55422	Particulars of Expenditure Transfer of balance of funds from RFT COPE Fund #2 to RFT COPE Fund #1 in order to terminate COPE Fund #2	Date (month, day, year) 3/17/79	Amount of each expenditure this period 4,311.57
	Expenditure for ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for ☐ Primary ☐ General ☐ Other		
SUBTOTAL of expenditures this page (optional)			\$ 4,311.57
TOTAL (transfer to last page this line number only)			\$ 4,311.57

470040135012

Attachment 2



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Glen H. Nord, Treasurer
Robbinsdale Federation of
Teachers COPE Fund #2
2040 North Douglas Drive
Golden Valley, MN 55422

Re: MUR 1022

Dear Mr. Nord:

On September , 1979, based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission found reason to believe that you may have violated a provision of the Federal Election Campaign Act of 1971, as amended.

Specifically, it appears that your Committee violated 2 U.S.C. §441b and 11 C.F.R. §102.6 by accepting a transfer of \$3,539.00 from an account which contained union dues. However, after considering the circumstances in this matter, the Commission has determined that no further action should be taken. Accordingly, the file will be closed in this matter.

If you have any questions concerning this matter or if there is any relevant factual or legal materials you wish to submit for the public record, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4175 or our toll-free line (800) 424-9530.

Sincerely,

William C. Oldaker
General Counsel

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE August 27, 1979 ANALYST Beverly Brown BB

TO: William C. Oldaker TEAM CHIEF Steve Hims

THROUGH: STAFF DIRECTOR AL for AAP COMPLIANCE REVIEW Carroll Bowen CB

FROM: [Signature] ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS MUR1022

CANDIDATE/COMMITTEE: Robbinsdale Federation of Teachers COPE Fund #2

TREASURER: Mr. Glen H. Nord

ADDRESS: 2040 North Douglas Drive
Golden Valley, MN 55422

AFFILIATE(S):

ALLEGATION(S):	CITE:	ATTACHMENT(S)
Receipt of co-mingled Funds from state account	2 U.S.C. 441b 11CFR 102.6	#2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE:

Normal review initiated on 1/30/79 ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 1/1/78 TO 10/2/78

TOTAL RECEIPTS \$ 3604 TOTAL EXPENDITURES \$ 3512

CASH ON HAND \$ 91 DEBTS \$ 0

HISTORY:

RESULTS OF REVIEW: ATTACHMENT
Informational letter/ Surface Violation Notice sent 1/30/79
Response received on 2/6/79 #3

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
Telecon 2/5/79 #3

Telecon after receipt of committee response

REASON(S) FOR REFERRAL: ATTACHMENT
See above allegations

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT
None

OTHER RELEVANT INFORMATION:
The committee discloses a refund of contributions (co-mingled funds) transferred to the American Federation of Teachers COPE Fund and the Martin Sabo for Congress Volunteers. The Robbinsdale Federation of Teachers COPE Fund #2 terminated on 4/13/79. Residual funds were transferred to their state account. #4

79040135015

ATTACHMENT #1
Copy

7 9 0 4 0 1 3 5 0 1 6

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)DATE 24APR79
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
ROBBINSDALE FEDERATION OF TEACHERS COPE FUND #2								II# C00103760
CONNECTED ORGANIZATION: TEACHERS; AMERICAN FEDERATION OF								
	1978 STATEMENT OF ORGANIZATION					29SEP78	4	78FEC/086/1902
	1979 MISCELLANEOUS TRANSACTION FROM F.E.C.					30JAN79	4	79FEC/118/3689
	MISCELLANEOUS TRANSACTION FROM F.E.C.					30JAN79	2	79FEC/118/3696
	MISCELLANEOUS TRANSACTION TO F.E.C.					13FEB79	6	79FEC/120/3259
1978	30 DAY POST-PRIMARY	3,604		3,512		1JAN78 - 20CT78	6	78FEC/090/0384
	10 DAY PRE-GENERAL	2,446		600		30CT78 - 230CT78	4	78FEC/092/5135
	30 DAY POST-GENERAL	1,004		0		240CT78 - 27NOV78	3	78FEC/099/1032
	YEAR END REPORT	175		0		28NOV78 - 31DEC78	3	79FEC/118/3502
1979	APRIL 10 QUARTERLY - TERMINATED	1,195		4,311		1JAN79 - 31MAR79	6	79FEC/124/4690
	TOTAL	8,424	0	8,423	0		38	TOTAL PAGES
TERMINATED								

ALL REPORTS HAVE BEEN REVIEWED

79010135017

Attachment #2
Copy

REPORT OF RECEIPTS AND EXPENDITURES
FOR A CANDIDATE OR COMMITTEE
SUPPORTING CANDIDATE(S) FOR
NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

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. *CFR Part 112*

1 Republican Federation of Teachers 2 I.D. No. C00103960
Name of Candidate or Committee (in full) Candidate/Committee
2410 North Douglas Drive
Address (number and street)
Golden Valley, Minn. 55425
City, State and ZIP Code ☐ Check if address is different than previously reported. Year of Election 1978

4 Type of Report (check appropriate boxes)

- ☐ April 10 Quarterly Report ☐ Tenth day report preceding _____ election
(primary, general or convention) ☐ Termination Report
☐ July 10 Quarterly Report on _____ in the State of _____
(date) ☐ Amendment for: _____
☐ October 10 Quarterly Report ☒ Thirtieth day report following Primary election
(primary, general or convention) (which report) _____
☐ January 31 Annual Report ☐ Monthly Report _____ on _____ in the State of _____
(month) (date)
This is a report for ☐ Primary Election ☐ General Election ☐ Primary and General ☐ Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES
(Figures may be rounded to nearest dollar.)

5 Covering Period _____ Through _____	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19 _____		\$.00
7 Cash on hand at beginning of reporting period	\$.00	
8 Total receipts (from line 19)	\$ 3,604.00	\$ 3,604.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 3,604.00	\$ 3,604.00
9 Total expenditures (from line 25)	\$ 3,512.77	\$ 3,512.77
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 91.23	\$ 91.23
11 Value of contributed items on hand to be liquidated (Attach itemized list) \$ _____		
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$.00	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$.00	

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

Oct 11, 1978
(Date)

Glen H. Nord
(Typed Name of Treasurer or Candidate)

Glen H. Nord
(Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441j (see reverse side of form).

For further
information,
Contact:

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

or call 800/424-9530

Approved by GAO
B-187620 (R0506)
Expires 3-31-81

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

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

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE *Carl Ford Jr*
Alabama Federation of Teachers

REPORT COVERING THE PERIOD
FROM: *Jan. 1, 1978* TO: *Oct. 2, 1978*

RECEIPTS

Column A
This Period

Column B
Calendar Year-To-Date

14. Contributions from Individuals (including contributions in-kind):

- (a) Itemized (use Schedule A)
(b) Unitemized
(c) Sales and collections included above:
List by event on memo Schedule D (\$)
(d) Subtotal of contributions from individuals

\$
\$ *45.00*
\$
\$
\$

\$ *45.00*

15. Transfers from Political Committees:

- (a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount)
(b) Funds from other committees (itemize on Schedule A regardless of amount)
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)
(d) Subtotal of transfers in and contributions in-kind from political committees

\$ *3,539.00*
\$
\$
\$ *3,539.00*

\$ *3,539.00*

16. Other Income:

- (a) Itemized (use Schedule A)
(b) Unitemized
(c) Subtotal of other income

\$
\$
\$

\$

17. Loans and Loan Repayments Received:

- (a) Itemized (use Schedule A)
(b) Unitemized
(c) Subtotal of loans and loan repayments received

\$
\$
\$ *3,604.00*

\$ *3,604.00*

18. Refunds, Rebates, Returns of Deposits:

- (a) Itemized (use Schedule A)
(b) Unitemized
(c) Subtotal of refunds, rebates, returns of deposits

\$
\$
\$

\$

19. Total Receipts

\$ *3,604.00*

\$ *3,604.00*

EXPENDITURES

20. Operating Expenditures:

- (a) Itemized (use Schedule B)
(b) Unitemized
(c) Subtotal of operating expenditures

\$
\$ *13.40*
\$

\$ *13.40*

21. Loans, Loan Repayments, and Contribution Refunds Made:

- (a) Itemized (use Schedule B)
(b) Unitemized
(c) Subtotal of loans and loan repayments made and contribution refunds

\$
\$
\$ *.00*

\$ *.00*

22. Transfers Out to Political Committees:

- (a) To affiliated/authorized committee (itemize on Schedule B regardless of amount)
(b) To other committees (itemize on Schedule B regardless of amount)
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)
(d) Subtotal of transfers out

\$ *3,499.37*
\$ *50.00*
\$ *.00*
\$ *3,499.37*

\$ *3,499.37*

23. Independent Expenditures (use Schedule E)

\$ *.00*

\$ *.00*

24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F)

\$ *.00*

\$ *.00*

25. Total Expenditures

\$ *3,512.77*

\$ *3,512.77*

**RECEIPTS AND EXPENDITURES,
NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES**

26. Total Receipts (from line 19)

\$ *3,604.00*

27. Transfers In (from line 15(a))

\$ *3,539.00*

28. Net Receipts (Subtract line 27 from line 26)

\$ *65.00*

29. Total Expenditures (from line 25)

\$ *3,512.77*

30. Transfers Out (from line 22(a))

\$ *3,499.37*

31. Net Expenditures (Subtract line 30 from line 29)

\$ *63.40*

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 1 of 1 for

Line Number 15

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

Rebbinsdale Federation of Teachers CCPE Fund # 2

Full Name, Mailing Address and ZIP Code

*Rebbinsdale Federation of
Teachers CCPE Fund # 1
2046 North Douglas Drive
Golden, CO 80601*

Principal Place of Business

Occupation

Date (month,
day, year)

1/25/78

Amount of each Receipt
this Period

\$3,539.00

Receipt for:

☒ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Occupation

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Occupation

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Occupation

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Occupation

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Occupation

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Occupation

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date . . . \$

SUBTOTAL of receipts this page (optional)

\$

TOTAL this period (last page this line number only)

\$ *3,539.00*

79-0610-10302020

SCHEDULE B
REVISED
 January, 1978
 Federal Election Commission
 25 K Street, N.W.
 Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Page 1 of 1 for
 Line Number 22b
 (Use Separate Schedules for
 each numbered line)

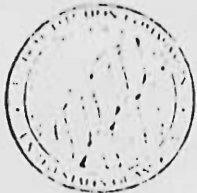
Name of Candidate or Committee in Full			
Robbinsdale Federation of Teachers (COPE Fund #2)			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Martin Sabo 3129 E. 22 nd Street Minneapolis, Minn 55426 612/967227	Contribution to Sabo for Congress Fund Raiser	9/17/78	\$ 50.00
	Expenditure for: ☐ Primary ☒ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
SUBTOTAL of expenditures this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 50.00

7 27 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

Name of Candidate or Committee in Full			
Robbinsdale Federation of Teachers COPE Fund #2			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
American Federation of Teachers COPE Fund #1 11 Durant Circle N.W. Washington DC 20036	a contribution to our Parent organization	4/14/78	\$ 1000.00
	Expenditure for: ☐ Primary ☐ General ☒ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Robbinsdale Federation of Teachers COPE Fund #1 2040 North Douglas Drive Golden Valley Minn. 55428	Transfer of funds to our RFT COPE Minnesota "State" Fund	4/21/78	\$ 2,449.37
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
SUBTOTAL of expenditures this page (optional)			\$
TOTAL this period (last page this line number only)			\$

79910155023

Attachment #3
Copy



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

INFORMATIONAL NOTICE

Mr. Glen H. Nord, Treasurer
Robbinsdale Federation of Teachers COPE Fund #2
2040 North Douglas Drive
Golden Valley, Minnesota 55422

January 30, 1979

Dear Mr. Nord:

During review of the following Report(s) of Receipts and Expenditures:
30 Day Post General

we noticed that you may have received funds in excess of \$1,000 from an organization(s) which is not registered under the Act as a political committee.

For your information, we are attaching a copy of our letter to this organization listed as the source of the funds. Since they are being given the opportunity to bring themselves into compliance as a registered political committee, you may wish to consult with the organization.

If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. If you have any questions, please contact James B. Brown, our Reports Analyst assigned to you, at (800)424-9530. Our local numbers are (202)523-4172(House) and (202)523-4048(Senate).

79076371510023433



FEDERAL ELECTION COMMISSION

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

January 30, 1979

Treasurer
Robbinsdale Federation of Teachers COPE #1
2040 North Douglas Drive
Golden Valley, Minnesota 55422

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. Our review of the receipts reported by other political committees indicates that your organization may have contributed in excess of \$1,000 to a committee that supports Federal candidates. Attached is a copy of the report in which this contribution was listed.

The Act defines "political committee" to mean any committee, club, association, or other group of persons which receives contributions or makes expenditures aggregating in excess of \$1,000 during a calendar year for the purpose of influencing Federal elections. Transfers of funds to political committees which support Federal candidates are considered "expenditures." The Act further precludes such a political committee from making contributions in excess of \$1,000 per Federal candidate per election unless and until the committee can qualify as a multicandidate committee, in which case it can give up to \$5,000 per candidate per election. The Act defines a multicandidate committee as one which has been registered for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office.

It would appear that your organization may qualify as a "political committee" under the Act, subject to the registration and reporting requirements of the law, as well as the contribution limitations.

Enclosed are relevant informational materials with regard to the Federal Election Campaign Act, including the appropriate forms for registration and reporting by political committees. Please examine these materials and:

- 1) if you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1 within fifteen (15) days of receipt of this letter. In addition, your committee will be required to file disclosure reports in accordance with the provisions of 2 U.S.C. 434 on FEC Form 3. You must, however, request a refund of the amount of your contribution in excess of \$1,000 from the candidate or political committee because you cannot qualify at this time as a multicandidate committee.

79919-1052601

- Certified Mail:
Return Receipt Requested

TELECON FOR THE FILE

ROBBINSDALE FEDERATION OF TEACHERS COPE FUND #2

C00103960

(Full Name Of Committee)

(Identification Number)

Beverly Brown

(Name of Analyst)

Mr. Glen Nord - Treasurer

(Committee Contact)

DATE/TIME: 2/5/79 10:30 A.M.

IN REFERENCE TO: 2SV1/78-210

PHONE NUMBER: (612) 533-7782

REMARKS:

Background: In their 30 Day Post General Election report of receipts and expenditures, the Robbinsdale Federation of Teachers COPE Fund #2 disclosed a transfer in of \$3539 from the Robbinsdale Federation of Teachers COPE Fund #1. The Reports Analysis Division sent a surface violation letter to the Robbinsdale Federation of Teachers COPE Fund #1 stating that the organization may have been in violation of 2 U.S.C. 433 (failure to register as a political committee. In addition, in accordance with former procedures, an informational letter was sent to the Robbinsdale Federation of Teachers COPE Fund #2. This letter informed Fund #2 that they had received contributions in excess of \$1000 from an unregistered entity and advised the committee to determine whether or not the source of funds received from Fund #1 were prohibited by 2 U.S.C. 441a.

Mr. Glen Nord, treasurer of the Robbinsdale Federation of Teachers COPE Fund #2, called in response to the Commission's surface violation notice. Mr. Nord stated the Fund #1 was set up prior to Fund #2 to collect contributions for State and local campaigns. A fund Drive had been held in 1978 and from that Drive the committee had deposited \$3539 of voluntary contributions into Fund #1. Later, when Fund #2 was established and registered with the Federal Election Commission, the \$3539 was transferred over from Fund #1. It was the understanding at the time that since the \$3539 represented voluntary contributions, the committee would not be prohibited from transferring the funds to their separate segregated fund (Fund #2.).

Asked if Fund #1 had at any time contained other than voluntary contributions, Mr. Nord stated that union dues had been deposited into Fund #1 since state law did not prohibit the comingling of funds. I informed Mr. Nord that since the voluntary contributions from the drive had been deposited into a comingled account, they too would be considered to be comingled funds. In addition, since comingled funds had been deposited into Fund #2, Fund #2 would be considered to contain tainted monies. Furthermore, since the committee had transferred comingled funds to candidates and committees, the candidates and committees would also be in violation of the act for having received prohibited funds.

Asked how Fund #2 might go about reconciling the situation, I advised Mr. Nord to request refunds from all candidates and committees who had received contributions during the 30 Day Post General period. In turn, these funds should be deposited into Fund #2 and immediately transferred over to Fund #1. Fund #2 should disclose all transactions

taking place with regard to this matter. Furthermore, the committee should immediately respond to the Commission's surface violation letter by informing the Commission of 1) the source of funds transferred from Fund #1 to Fund #2 2) any misunderstanding regarding the prohibitions of transferring these funds 3) all action to be taken by the committee in order to reconcile the situation. This information should be forwarded to the Commission in written form. Any additional evidence of their attempts to comply with the Act (eg. copies of letters to be sent to candidates asking for a refund of contributions) would be beneficial.

Mr. Nord asked for a repetition of my advice and stated that the information would be forwarded as soon as possible.

79040135028

ROBBINSDALE FEDERATION of TEACHERS

February 9, 1979

TO: Beverly Brown, Federal Elections Commission
FROM: Glen Nord, RFT COPE Treasurer

HISTORY & SOURCE OF FUNDS: On February 25, 1978, the Robbinsdale Federation of Teachers (RFT) established a fund entitled, Robbinsdale Federation of Teachers COPE Fund #2, hereinafter referred to as RFT COPE Fund #2, which was designed to comply with the requirements of the Federal Elections Commission.

For a number of year the RFT had possessed another fund entitled, RFT COPE Fund, hereinafter referred to as RFT COPE Fund #1 from which it made contributions to local and state candidates. This original fund did contain some dues money. Because the RFT COPE Fund #2 was not set up until after our 1977 fund drive, we transferred from the RFT COPE Fund #1 to the RFT COPE Fund #2, \$3,539.00 which we could document as constituting voluntary contributions from our 1977 collections. During the fall drive of 1978, we placed the entire amount of our voluntary collections in our RFT COPE Fund #2 and transferred funds by check to RFT COPE Fund #1 as needed to support local and state candidates.

We were informed by Orlando Potter of the Federal Elections Commission in a letter dated January 30, 1979, that our transfer of \$3,539.00 from RFT COPE Fund #1 to RFT COPE Fund #2 was improper because the money had been co-mingled with dues money. We were further informed that the RFT must request from each federal candidate to whom we sent money a return of the same amount.

HOW WE PLAN TO CORRECT THE PROBLEM: We have requested from each federal candidate and the American Federation of Teachers (see enclosed letters) a return of all 1978 contributions we had made. Once this money is returned, we will write a check from RFT COPE Fund #2 to RFT COPE Fund #1 for the total amount of money in RFT COPE Fund #2. This will be somewhat less than \$3,539.00 because during 1978, we have written checks from RFT COPE Fund #2 to RFT COPE Fund #1. This was necessary because RFT COPE Fund #1 is registered with the State of Minnesota in compliance with its Fair Campaign Practices Act. We must then write checks from RFT COPE Fund #1 to the volunteer committees of state and local candidates. RFT COPE Fund #2 will remain in existence with a balance of zero dollars until we again obtain voluntary funds in the fall of 1979.

QUESTION: Since we would like to reimburse the federal candidates and the American Federation of Teachers, from whom we have had to request a return of our 1978 contributions, would it be proper to borrow money from a bank, after we have zeroed the RFT COPE Fund #2, repay the federal candidates from these borrowed funds, and then in November of 1979, after we complete our drive for voluntary funds, pay off the bank loan from RFT COPE Fund #2?

cc: Roger Peterson, Attorney
Sandy Peterson, RFT Pres.
Lois Wendt, RFT COPE Chair.

ROBBINSDALE FEDERATION of TEACHERS

February 6, 1979

Ms. Elaine Kienitz, Treasurer
Martin Sabo Volunteer Committee
4920 Elliot Avenue South
Minneapolis, Mn. 55417

Dear Ms. Kienitz:

We have been required by the Federal Election Commission to request from you the return of \$50.00 which is the amount of money the RFT contributed to Mr. Sabo's 1978 election campaign.

Though the funds used for this purpose were all obtained from voluntary contributions they were, according to the Commission, co-mingled with dues money. We had used legal advice in setting up a special fund for Federal contributions, but because of a technicality violated one of the Commission rules.

We certainly feel obligated to return to your campaign committee the \$50.00 once the Federal Elections Commission declares our COPE fund number 2, which is designated for Federal contributions, to be pure. Unfortunately, this may take over a year. All COPE monies presently collected, according to the Commission, are contaminated and we will have to wait until the completion of the 1979 fall drive before we will have pure money to honor our commitment.

We are very sorry for this inconvenience, but have no alternative but to comply.

Sincerely yours,

Barry K. Roach
Barry K. Roach
Executive Secretary

ROBBINSDALE FEDERATION of TEACHERS

February 6, 1979

Mrs. Rachelle Horowitz
AFT/COPE Director
11 Dupont Circle N.W.
Washington, D. C. 20036

Dear Rachelle:

We have been required by the Federal Election Commission to request from you the return of \$1,000 which is the amount of money the Robbinsdale Federation of Teachers contributed to your 1978 AFT/COPE.

Though the funds used for this purpose were all obtained from voluntary contributions they were, according to the Commission, co-mingled with dues money. We had used legal advice in setting up a special fund for Federal contributions but because of a technicality violated one of the Commission rules.

We certainly feel obligated to return to your AFT/COPE fund the \$1,000 once the Federal Elections Commission declares our COPE fund number 2, which is designated for Federal contributions, to be pure. Unfortunately, this may take over a year. All COPE monies presently collected, according to the Commission, are contaminated and we will have to wait until the completion of the 1979 fall drive before we will have pure money to honor our commitment.

We are sorry for this inconvenience, but have no alternative but to comply.

Sincerely yours,


Barry K. Housh
Executive Secretary

ROBBINSDALE FEDERATION of TEACHERS

February 6, 1979

Mr. Michael Freeman
5811 Excelsior Boulevard
St. Louis Park, Minn. 55426

Dear Mike:

We have been required by the Federal Election Commission to request from you the return of \$350.00 which is the amount of money the RFT contributed to your 1978 campaign.

Though the funds used for this purpose were all obtain from voluntary contributions they were, according to the Commission, co-mingled with dues money. We had used legal advice in setting up a special fund for Federal contributions but because of a technicality violated one of the Commission rules.

We certainly feel obligated to return to your campaign committee the \$350.00 once the Federal Elections Commission declares our COPE fund number 2, which is designated for Federal contributions, to be pure. Unfortunately, this may take over a year. All COPE monies presently collected, according to the Commission, are commingled and we will have to wait until the completion of the 1979 fall drive before we will have pure money to honor our commitment.

We are sorry for this inconvenience, but have no alternative but to comply.

Sincerely yours,

[Signature]
Larry R. Roach
Executive Secretary

ROBBINSDALE FEDERATION of TEACHERS

February 6, 1979

Mr. Gerald Dillon
Donald Fraser Campaign Treasurer
500 So. 3rd St.
Minneapolis, Mn. 55417

Dear Mr. Dillon:

We have been required by the Federal Election Commission to request from you the return of \$250.00 which is the amount of money the RFT contributed to your 1978 election campaign.

Though the funds used for this purpose were all obtained from voluntary contributions they were, according to the Commission, co-mingled with dues money. We had used legal advice in setting up a special fund for Federal contributions, but because of a technicality violated one of the Commission rules.

We certainly feel obligated to return to your campaign committee the \$250.00 once the Federal Elections Commission declares our COPE number 2 fund, which is designated for Federal contributions, to be pure. Unfortunately, this may take over a year. All COPE monies presently collected, according to the Commission, are contaminated and we will have to wait until the completion of the 1979 fall drive before we will have pure money to honor our commitment.

Sincerely yours,

Barry K. Nonck
Barry K. Nonck
Executive Secretary

TELECON

TO: THE FILE

FROM: BEVERLY BROWN

CONCERNING: ROBBINSDALE FEDERATION OF TEACHERS COPE FUND #2

COMMITTEE CONTACT: GLEN NORD

After receiving the committee's response to an informational notice from the Commission, I called Mr. Nord to inform him that the committee need only request refunds from Martin Sabo and the American Federation of Teachers Cope Fund. It appeared that these candidates/committees were the only recipients of co-mingled funds from their state account. The remaining committees, mentioned in his letter of 2/6/79, apparently received voluntary contributions.

Funds received from Fund #1..... , \$3539
Funds transferred out during
same reporting period..... \$3499

Fund #1.....(\$2449)
Martin Sabo.....(50)
AFT COPE.....(1000)

Total \$3499

Difference

\$40 - May still be held in their
closing cash on hand

7 9 0 1 0 1 5 5 0 3 4

7 9 0 4 0 1 5 5 0 3 5

ATTACHMENT #4
Copy

RECEIVED
FEDERAL ELECTION
COMMISSION

APR 10 1979

April 10, 1979
Robbinsdale Federation of Teachers
COPE Fund #2
2040 North Douglas Drive
Golden Valley, Minn. 55422

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

Gentlemen:

I would like to inform you that our committee, the Robbinsdale Federation of Teachers COPE Fund #2, intends to terminate our fund.

We transferred our cash balances to our state and local fund, which we call the Robbinsdale Federation of Teachers COPE Fund #1. We presently, therefore, have a zero balance in our RFT COPE Fund #2 account.

Would you please send us notice that you have received our termination notice and that our committee is terminated. Thank you.

Sincerely,

Glen H. Nord

Glen H. Nord.
Treasurer

79040135036
7904013590

FEC FORM 3
REVISED
January 1979
Federal Election Commission
1125 K Street, N.W.
Washington, D.C. 20543

REPORT OF RECEIPTS AND EXPENDITURES
FOR A CANDIDATE OR COMMITTEE
SUPPORTING CANDIDATE(S) FOR
NOMINATION OR ELECTION TO FEDERAL OFFICE
(Except for Candidates or Committees Receiving Federal Matching Funds)

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

Robbinsdale Federation of Teachers COPE Fund #2 2 F.D. No. 000103960
Name of Candidate or Committee (to full)
2040 North Douglas Drive
Address (number and street)
Golden Valley, Minn. 55422
City, State and ZIP Code Minn. 55422 ☐ Check if address is different than previously reported
Year of Election
4 Type of Report (check appropriate box)
☒ April 10 Quarterly Report ☐ Tenth day report preceded by
☐ July 10 Quarterly Report on _____ in the State of _____
☐ October 10 Quarterly Report date _____
☐ January 31 Annual Report ☐ Tenth day report for _____
☐ Monthly Report _____ in the State of _____
This is a report for ☐ Primary Election ☐ General Election ☐ Primary and General ☐ Other _____

SUMMARY OF RECEIPTS AND EXPENDITURES
(Figures may be rounded to nearest dollar)

	Column A This Period	Column B Calendar Year-To-Date
5 Covering Period Jan. 1, 1979 Through Mar. 31, 1979		
6 Cash on hand January 1, 1979		\$.00
7 Cash on hand at beginning of reporting period	\$ 3,115.57	
8 Total receipts (from line 19)	\$ 1,195.00	\$ 6,424.34
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 4,311.57	\$ 6,424.34
9 Total expenditures (from line 25)	\$ 4,311.57	\$ 6,424.34
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$.00	\$.00
11 Unliquidated contributions on hand to be liquidated (Attach itemized list)	\$	
12 Debts and obligations owed to the Committee (Candidate) (Identify each \$100.00)	\$.00	
13 Debts and obligations owed by the Committee (Candidate) (Identify each \$100.00)	\$.00	

I certify that I have examined this Report and to the best of my knowledge and belief it is true and correct.
4/10/79 Glen H. Nord
Date Printed Name of Treasurer or Candidate

Note: Submission of false, erroneous or incomplete information may subject the submitter to the penalties of 18 U.S.C. Section 437, or Section 441, even reverse side of form.

For further
information,
contact:

Federal Election Commission
1125 K Street, N.W.
Washington, D.C. 20543

OFFICIAL NO. 424-9510

Approved by GAO
H. 18-7620 (10/1/79)
1-79-5311-1

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

Information reported herein may not be copied for circulation by any person for purposes of soliciting contributions or for any commercial purpose.

179040135037

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE		REPORT COVERING THE PERIOD	
		FROM:	TO:
RECEIPTS		Column A This Period	Column B Calendar Year To Date
14. Contributions from individuals (including contributions in-kind)			
(a) Itemized (use Schedule A)	\$.00		
(b) Unitemized	\$ 145.00		
(c) Sales and collections included above			
List by event on memo Schedule D (S .00)			
(d) Subtotal of contributions from individuals	\$ 145.00	\$ 3,835.34	
15. Transfers from Political Committees			
(a) Funds from affiliated authorized committee (itemize on Schedule A regardless of amount)	\$.00		
(b) Funds from other committees (itemize on Schedule A regardless of amount)	\$ 1,050.00		
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)	\$.00		
(d) Subtotal of transfers in-kind and contributions in-kind from political committees	\$ 1,050.00	\$ 4,585.00	
16. Other Income			
(a) Itemized (use Schedule A)	\$.00		
(b) Unitemized	\$.00		
(c) Subtotal of other income	\$.00	\$.00	
17. Loans and Loan Repayments Received			
(a) Itemized (use Schedule A)	\$.00		
(b) Unitemized	\$.00		
(c) Subtotal of loans and loan repayments received	\$.00	\$.00	
18. Refunds, Rebates, Returns of Deposits			
(a) Itemized (use Schedule A)	\$.00		
(b) Unitemized	\$.00		
(c) Subtotal of refunds, rebates, returns of deposits	\$.00	\$.00	
19. Total Receipts	\$ 1,195.00	\$ 8,420.34	
EXPENDITURES			
20. Operating Expenditures			
(a) Itemized (use Schedule B)	\$.00		
(b) Unitemized	\$.00		
(c) Subtotal of operating expenditures	\$.00	\$ 23.40	
21. Loans, Loan Repayments, and Contribution Refunds Made			
(a) Itemized (use Schedule B)	\$.00		
(b) Unitemized	\$.00		
(c) Subtotal of loans and loan repayments made and contribution refunds	\$.00	\$.00	
22. Transfers Out to Political Committees			
(a) To affiliated authorized committee (itemize on Schedule B regardless of amount)	\$ 4,311.57		
(b) To other committees (itemize on Schedule B regardless of amount)	\$.00		
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)	\$.00		
(d) Subtotal of transfers out	\$ 4,311.57	\$ 4,610.94	
23. Independent Expenditures (use Schedule E)	\$.00	\$.00	
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F)	\$.00	\$.00	
25. Total Expenditures	\$ 4,311.57	\$ 8,420.34	
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19)	\$ 1,195.00		
27. Transfers in (from line 15(d))	\$.00		
28. Net Receipts (Subtract line 27 from line 26)	\$ 1,195.00		
29. Total Expenditures (from line 25)	\$ 4,311.57		
30. Transfers Out (from line 22(d))	\$ 4,311.57		
31. Net Expenditures (Subtract line 30 from line 29)	\$.00		

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ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 1 of 1 for
Line Number 15 b.

Use Separate Schedules for
each numbered line.

Name of Candidate or Committee in Full

Robbinsdale Federation of Teachers COPE Fund #2

Full Name, Mailing Address and ZIP Code

**American Federation of Teachers
COPE Fund, 11 Durant Circle N.W.
Washington, D.C. 20036**

Principal Place of Business

Same as address

Occupation

**Date received
(day, month)**

**Amount received
(in dollars)**

3/7/79 1,000.00

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check ☐ Cash ☐ Other ☐ Money order
Approximate Year for Date \$ **1,000.00**

Principal Place of Business

**Date received
(day, month)**

Full Name, Mailing Address and ZIP Code

**Martin Sabo for Congress Volunteers
3129 S. 22nd Street
Minneapolis, Minn. 55406**

Occupation

3/7/79 50.00

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check ☐ Cash ☐ Other ☐ Money order
Approximate Year for Date \$ **50.00**

Principal Place of Business

**Date received
(day, month)**

Full Name, Mailing Address and ZIP Code

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check ☐ Cash ☐ Other ☐ Money order
Approximate Year for Date \$

Principal Place of Business

**Date received
(day, month)**

Full Name, Mailing Address and ZIP Code

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check ☐ Cash ☐ Other ☐ Money order
Approximate Year for Date \$

Principal Place of Business

**Date received
(day, month)**

Full Name, Mailing Address and ZIP Code

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check ☐ Cash ☐ Other ☐ Money order
Approximate Year for Date \$

Principal Place of Business

**Date received
(day, month)**

Full Name, Mailing Address and ZIP Code

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check ☐ Cash ☐ Other ☐ Money order
Approximate Year for Date \$

Principal Place of Business

**Date received
(day, month)**

Full Name, Mailing Address and ZIP Code

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check ☐ Cash ☐ Other ☐ Money order
Approximate Year for Date \$

Principal Place of Business

**Date received
(day, month)**

Full Name, Mailing Address and ZIP Code

SUBTOTAL

\$ 1,050.00

TOTAL

\$ 1,050.00

79040135039

SCHEDULE B

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20543

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page 1 of 1 for

Line Number 22

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

Robbinsdale Federation of Teachers COFE Fund #2

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Robbinsdale Federation of Teachers COFE Fund #1, 2040 North Douglas Drive, Golden Valley, Minn. 55422	Transfer of balance of funds from RFT COFE Fund #2 to RFT COFE Fund #1 in order to terminate COFE Fund #2	3/17/79	4,311.57
	Expenditure for ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for ☐ Primary ☐ General ☐ Other		
SUBTOTAL of expenditures this page (actions)			\$ 4,311.57
TOTAL this period (see page this line number only)			\$ 4,311.57

79040135040



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1022

Date Filmed 10/2/79 Camera No. --- 2

Cameraman BPC

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RECEIVED OCT 10 1979